

Airspace change: consultation on a decision-making process for PPR (planned and permanent redistribution of air traffic) proposals, CAP 1786.

The South East London campaign group Plane Hell Action responds here on 6th July 1029 to the above CAA consultation document.

<https://consultations.caa.co.uk/policy-development/ppr-decision-making-process/>

Plane Hell Action's General Observations:

There is insufficient importance given to the communities affected by PPR despite them being listed first as 'who is affected by a relevant PPR' on page 27 of the proposals document. Instead, this consultation represents only the needs of the aviation industry and aviation decision makers with the rider of air safety and efficiency. The health and well-being of the people on the ground should be paramount when it comes to PPR: no communities should be picked out for suffering.

Although not used in this consultation, there must never be any reason to use phrases such as 'there will be winners and losers' or 'no one solution fits all'. These are harmful and disrespectful ideas and must never be used when talking about overflown communities.

It is not acceptable to set the clock on PPR to run forward from November 2019. Producing the consultation at this time, July 2019, is an admission of CAA failures to monitor flight path changes/adjustments made in recent years without consultation. i.e. the CAA has failed to follow due process and/or to monitor ANSP failure to follow due process. Clear changes have occurred in the arrival swathes for approaches into LHR, that have had the effect of narrowing base-leg routes into concentrated paths, affecting residents punitively. See the [Plane Hell Action/HACAN report Corridors of Concentration](#). Through these arrivals changes, a failure to protect the overflown has occurred and this provides every reason to consider retrospectively that those 'relevant' and other PPRs that were stealthily introduced before November 2019 be reversed.

Paradoxically, bringing in the PPR process at this time, November 2019, can now be used to prevent the overflown doing anything about the recent punitive narrowing of these arrival routes, since the CAA are given authority over ATC procedures via a process that enables them to devise consultations which inevitably lead to the outcome preferred by the industry. There is now no time left in which the communities affected by recent narrowing of arrivals into concentrated paths can make any Statement of Need and provide model of their plight.

There are too many types of PPR, with only one type under consultation in this document. This allows ANSPs freedom to change flightpaths with CAA support for a 'no need for a consultation' approach.

If, as the Government trumpets, planes are getting 'quieter' (less noisy is a more honest description) there is no need to concentrate flight paths, which will be the main

scenario for PPR implementation, but there is instead every possibility to disperse paths, so that all stakeholders share the downside and all stakeholders share the upside.

The CAA and the PPR process must henceforth implement government advice published in the ANG 2017 where it states that the overall effect of noise must be reduced rather than the number of people affected. It is disappointing that the current actions by the CAA and of recent operational changes (since circa 2014) for arrivals to LHR have concentrated noise over less people, increasing the negative effects of noise onto the unfortunate selected communities and contradicting the ANG advice.

Heathrow data shows that the moving of the ILS join point by stealth in recent years, unofficially and further to the east (Heathrow westerly ops), has resulted in concentration of arrivals as planes head down the same base-legs towards a small set of join points. See the Plane Hell Action/HACAN document [Noise Relief](#).

This consultation proposals document aims to avoid any discussion of the Government's guidance to the CAA, despite the ANG17 being often referred to in the consultation proposals document, for example item 2.5 on page 23. Its importance must be mentioned in this response since it is from the ANG17 that duty of care to the overflown is directed.

Taken from ANG 2017 Page 18 - 20 noise implications

"In the airspace from the ground to below 4,000 feet the government's environmental priority is to limit and, where possible, reduce the total adverse effects on people"

3.5 For the purpose of assessing airspace changes, the government wishes the CAA to interpret this objective to mean that the total adverse effects on people as a result of aviation noise should be limited and, where possible, reduced, **rather than the absolute number of people in any particular noise contour**. Adverse effects are considered to be those related to health and quality of life.

3.20 This means there will be situations when multiple routes, that expose more people overall to noise but to a lesser extent, may be better from a noise perspective.

Taking account of consultation and the objectives of the airspace change proposal, with regard to assessing and comparing environmental impacts of a proposed change, preferred options should normally be based on those which result in fewer total adverse effects on people

The Air Navigation Guidance and Air Navigation Directions issued in October 2017 followed a [consultation](#) by the Department for Transport about airspace and noise policy. The Air Navigation Guidance, in addition to being statutory guidance to the CAA on environmental objectives in respect of its air navigation functions, also gives more information on the Secretary of State's role in the airspace change process

The Secretary of State must be satisfied that one of any three call-in criteria apply. These criteria are that the proposed change:

- is of strategic national importance,
- could have a significant impact (positive or negative) on economic growth of the United Kingdom, or

- could both lead to a change in noise distribution resulting in a 10,000 net increase in the number of people subjected to a noise level of at least 54 dB LAeq 16hr and have an identified adverse impact on health and quality of life.

The last of these criteria is based on the poor LAeq noise metric, that ignores frequency.

The use of an averaged noise measurement, LAeq, misrepresents the lived experience of low flying planes. The frequency of noise events and noise at low frequency is not accounted for in LAeq. Many residents of SE London experience 666 planes passing overhead every day below 4000 feet as they traverse base-leg routes towards the Heathrow ILS, at over 60 dB per plane. LAeq sums the sound pressure levels and divides by the number in the sum. Therefore, the LAeq will give the same value if there are 666 planes at 60 decibels and if there are 66 planes at 60 decibels.

It is a complete travesty to use any averaged-out metric to direct quality of life for people on the ground.

Also, establishing that the final criteria is satisfied will require improved/increased noise monitoring that is not currently developed/deployed as well as robust results from health research on the effects of noise/particulates on the overflow that has not yet been done. The Community Noise Group that co-chairs at the Heathrow Community Noise Forum has developed this fair and balanced noise objective that Plane Hell Action supports and that we propose is added as a further criterium to be satisfied by PPR triggers and processes:

“Where there is a reduction in overall noise the benefit be distributed proportionately to those already most affected and where there is an increase in overall noise the disbenefit be distributed proportionately to those already least affected.”

The webTAG model that is quoted in the document needs revision. If it is to be used as a decision making tool for airspace changes such as those requested as part of a PPR process then the given webTAG model requires comprehensive updating in the light of the latest WHO recommendations, in terms of the suite of metrics to be applied and the levels of values attributable to impacts in monetisation assessments.

The current DEFRA webTAG model shows that PBN leads to additional health impacts compared to traditional navigation technology. This applies even at 2017 average dispersion levels, which were significantly more concentrated than in 2013, the NPS base year. It can be shown that splitting a single route into two – in other words noise sharing - delivers huge health benefits and therefore dispersion of low-flying aircraft is paramount when making changes through PPR.

Q1 What are your views on the CAA's proposed decision-making process

Answer: Significant modifications needed

1. The name Planned Permanent Redistribution is inaccurate to a flawed or even fraudulent degree:

'Permanent' should be replaced with 'Published' because no such change should in fact be 'permanent' in the case where it causes harm to the health of the overflown. 'Redistribution' should be replaced with 'Repositioning' since the definition of redistribution is "the distribution of something in a different way, typically to achieve greater social equality". The current notion of 'PPR' that appears in this consultation will most definitely be used to do exactly the opposite – to narrow and concentrate paths and modify join points such that there will be greater noise on fewer people. Therefore the use of the term 'redistribution' is fallacious.

2. Changes to arrival routes into LHR and LCY have been operationally modified over the last 4-6 years. Join points for westerly operations into LHR have been moved further east resulting in concentrated base-leg patterns and greater noise for fewer people. These are historic PPRs that are not being accounted for in this consultation document. There must therefore be provision for a PPR, or within the PPR process, that allows a 'return' to patterns/operations of previous years. This provision is for residents who newly suffer debilitating noise as a result of operational changes that pre-date PPR and who were given no voice at the time of the changes. It is obscene that these residents should be trapped by the PPR process going forward without recourse to a prior situation.
3. Wording contained in the consultation document is too nebulous of
 - p23 2.2 'environmental objectives' is too vague and must specifically call out problems of noise
 - p29 'anticipation-base' needs a detailed definition
 - p29 2.21 'any other additional relevant information' needs a detailed definition
 - p29 2.23 it is not acceptable that a PPR once implemented and then found to meet one of the 3 criteria should not have that PPR 'called in'.
4. It is right that an ANSP should not be the only body that decides on what operational changes are made, but how will the overflown be represented during the decision-making process referred to in item 1.11 of page 17? It has not been made clear at all how the plight of the overflown with respect to particulates emitted by aircraft that are consumed by the blood stream, or to noise of aircraft at low altitude that prevents sleep and causes physical decrepitude, will be modelled within the PPR decision-making process. A glance at the flawed WEBTag table is not sufficient for this duty of care.
5. Item 1.16 on page 18 uses the expression 'in certain ways'. What on earth does that mean exactly?
6. Item 1.17 on page 19 makes much of the fact that increased noise effects could result from unchecked operational changes. This use of noise at this point is iniquitous as it is being used to validate the existence of a PPR process, while at the same time the balanced proportionate distribution of noise is not sufficiently represented within the decision-making procedure. How are the overflown and those affected from the collateral damage of operational changes supposed to be able to trigger PPRs themselves, something they will need to do when and unfair balance of noise is put over their heads.

7. Item 2.2 on page 22 refers to 'any guidance on environmental objectives'. This is a skimming over of the true issues that low-level overflight creates for people on the ground. There are issues of particulates, carbon monoxide, dirt and soot along with issues of noise. The human brain requires cleansing of toxic proteins through sleep to avert the onset of dementia: low flying planes at unsociable hours late at night or early in the morning cause sleep loss.
8. Item 2.6 on page 24 refers to the 'important role which local communities have'. This seems very disingenuous since communities are totally abused by being overflowed at low altitude. An example is the PBN route over SE London approved at a PIR stage by the CAA and that inflicts tortuous levels of noise on selected communities. These communities are totally unable to get any review of this PBN route so the 'important role' that those communities play is to be disempowered!

Q2 Do you have any comments on the way the CAA is interpreting the definition of a 'relevant PPR'?

Answer:

1. For the general public, the notion of 'relevant' PPR will be confusing.
2. The term Planned Permanent Redistribution is open to misinterpretation or misunderstanding. For the public in fact, using words like 'Permanent' are alarming. As said in our answer to Question 1, the term 'Redistribution' is a misnomer. The process would be better understood and less fallacious if called 'Planned Published Repositioning'. The term 'relevant' would be better understood by using a word like 'validated'. After all, a PPR is a PPR – it affects the overflow in some way and there is no way that one can be more 'relevant' than another when it comes to low-flying planes accruing overhead.
3. In criteria 1 for relevance, item 2.13 page 26, , the 'specified' distance should be clarified. The contents of the Annex that refers to the tolerance either side of the track at distance delta to runway threshold should be included next to this item.
4. We are concerned that the proposed system of PPR versus 'relevant PPR' allows ANSP/CAA to give the easy answer 'nothing has changed' when challenged by the overflow about increases in plane noise. A PPR that is not relevant will facilitate this answer by:
 - a. constricting flights in an ever-narrower lateral swathe without moving the actual flight path, thereby avoiding public consultation i.e. communities are gagged from saying 'these planes are too concentrated, please spread them' or
 - b. adjusting where planes join into the ILS without moving the specified join point itself.
5. We are concerned that the system of 'relevant' versus 'not relevant' PPR allows an ANSP to make a change overnight without consultation.
6. We are concerned that when communities challenge the effects of an implemented PPR or 'relevant PPR' by proposing an alternative solution/pattern they will be told

'this will require a consultation process' – a requirement that is, ironically, designed to deter communities from seeking a return to previous operations that spread noise more fairly and proportionately. It is crucial to note here that our items 4(a) and 4(b) above have already occurred for arrivals into LHR during westerly operations, as noted earlier, and that the PPR process is now being put in place to prevent residents seeking a return to the previous and less punitive arrival procedures. Hence, Plane Hell Action proposes that item 2 of our answer to Question 1 is added to the identification of 'relevant' PPR and furthermore, that a return to a previous pattern is NOT considered to be 'relevant'.

7. Item 2.16 on page 27 lists communities as the first to be affected by a relevant PPR. Since they are first in this list the PPR process must provide a means for communities to create a statement of need for 'reversal' of implemented PPRs that damage well-being and quality of life. This consultation document does not provide for this essential requirement.
8. Item 2.20 on page 29 is worrying since it implies that there are PPRs in the pipeline and that their implementation will result in punitive increases in noise/pollution for those who are already overflowed. This item needs to provide for review of PPR changes that have resulted in concentrations of planes on fewer people and for consideration of their reversal. Such a review has been done at Gatwick where the ILS join point and the positions at which planes were joining were resulting in increased noise for fewer people.
9. Item 2.23 is very worrying since it says that although a PPR was exercised prior to November 2019, it will not be reviewed, regardless of the distress that it causes to the communities it affects. This item should be removed.
10. Item 3.8 on page 45/46 refers to 'environmental factors' and 'significant impact'. This loose language that avoids specifying what are crucial impacts on communities is intolerable. Please increase the accuracy of such statements.
11. Item 3.15 on page 48 refers to consultations. Consultations from LHR and LCY have so far been flawed. There have been dishonest diagrams that misplace plane tracks and limited/contrived questions that are designed to give the answers wanted by the ANSP.

Q3 Do you agree that the 'trigger' process is the most appropriate way for ANSP to identify when to follow PPR process?

Answer: No

It is obvious that something must be the initiator for a PPR such as a trigger. However, by embedding the trigger definition within the control of the ANSP we are concerned that:

1. Communities are not empowered with the right to trigger a PPR process? Surely, a request for change cannot only be raised by an ANSP, since that would result in a dictatorship presided over by the aviation sector to satiate their own financial gains.

2. The trigger must include how to ensure duty of care for those who are already overflown. Proper and pukka modelling would ensure that the ill-effects of aviation are spread across the population in a fair and balanced way.
3. Item 4.9 on page 52 refers to 'modelling the anticipated geometric change'. If a community group wishes to create a Statement of Need for an operational change, then how are they expected to 'model' existing and new tracks? What tools and data can they access for doing this?
4. The decision diagram in item 4.10 on page 52/53 must include a proviso for an equal and fair distribution of noise/pollution just as safety obligations are already included. This proviso will comprise the noise objectives of the ANG17 and the new objective proposed by the Community Noise Group:

"Where there is a reduction in overall noise the benefit be distributed proportionately to those already most affected and where there is an increase in overall noise the disbenefit be distributed proportionately to those already least affected."

Q4 Are there any aspects of CAP1616 that are missing from proposed PPR process?

This is unanswered as it is beyond the expertise of a small campaign group. This is not to be interpreted under any of the given options of 'Yes, something more is needed'; 'No'; 'Don't know'

Q5 Where a PPR is proposed, can multiple workable options be developed?

Type 1: lateral shift

Type 2: departures

Type 3: change in ILS

Answer: Yes

Type 2: Departures currently have little effect on SE London unless departure heights over SE London will reduce to below stated 10,000ft.

Type 1: Operational procedures that maintain a distribution of noise across the full swathe must be designed (vectoring, coding).

Type 3: Operation procedures that use the full stretch of join point must be designed to counteract the tendency to 'bunch' joins into a few points thereby concentrating paths and increasing noise that harms the health of the overflown.

Q6 Do you agree with CAA proposal that the ANSP should produce the PIR rather than the CAA?

Answer: No, something more is needed

1. No single stakeholder such as the ANSP, or the CAA or the communities should singly produce the PIR.

2. An objective organisation such as AEF (Aviation Environment Federation) should be involved and even co-ordinate, drawing input from other stakeholders, particularly to ensure that balance of noise and pollution across communities has been achieved: a balance that will lessen the overall negative impact on the health and quality of life of those overflowed at low altitude.

Q7 Do you agree a scaled process for a temporary 'relevant PPR' lasting no more than 6 months

Answer: No. For those overflowed at low altitude, the changes that come about through PPRs, relevant PPRs or temporary PPRs are going to be a nightmare. There will be continual uncertainty, questioning, badly formed consultations and the destruction of quality of life by the creation of noise ghettos and lack of accountability and responsibility.

Q8 Is there anything specific that the CAA can do to aid the implementation of proposed PPR decision-making process?

Answer: Yes

1. Identify and expose a system of 'Accountability' for changes in overhead flight patterns. Communities must know who they can approach. They are currently rudderless, with no organization taking responsibility for distressing effects of increased noise. This is required within this PPR process.
3. Address the lack of consultation of 'historic' PPRs.
4. Provide a system for reverting to earlier flightpath patterns where implemented PPRs cause distress to the overflowed.
5. Change the name Planned Permanent Redistribution to Planned Publishesee Repositioning.
6. Change 'relevant' to 'validated'.