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**Plane Hell Action SE (PHASE)**

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

responds to

**APPG on Heathrow Expansion and Regional Connectivity inquiry:**

**Building Aviation Back Better: Developing an Environmental Aviation Strategy**

[Plane Hell Action SE](#) (PHASE), representing those under Heathrow (and London City Airport) arrivals paths in S and SE London, as well as supporting a strategy for arrivals and departures operations that fairly considers those under flight paths, supports Teddington Action Group's response: <http://www.teddingtonactiongroup.com/wp-content/uploads/Questions-with-TAG-responses-vfinal.pdf>

We make **additional comments, below in green**, that consider communities under **arrivals** flight path/s.

And we start by highlighting **Government's flawed policy to 'minimise impact'** which has resulted in unconsulted concentration of flight paths, often for up to 20 miles at low altitude for 19 hours, over communities who have had no say in the policy and do not benefit from, in this instance, Heathrow's operations and are yet forced to endure a soul-destroying 'quality' of life and negative health effects due to near-constant aviation noise and fuel emissions. Before any 'building aviation back better' this 'minimise impact' policy needs to be translated to mean 'share the impact by reducing concentration, giving everyone a complete break from aviation noise, and at least 8 hours' sleep at night'. Minimising the impact does not equate to minimising the numbers impacted.

## **Key Issues**

### **1. Aviation White Paper – see TAG's responses**

The delay to the publication of the Aviation White Paper provides an opportunity to pause and rethink its priorities to ensure that it delivers for the whole country.

- Is the mantra of 'growth everywhere' still feasible in a post-pandemic world?
- How much growth in aviation is compatible with the Net Zero targets?
- What incentive and penalties should be mandated to ensure technological improvements are delivered?
- What options should be considered for demand management?

**Additionally, PHASE does not support the current 'predict and provide' policy encouraged by airlines and airports.**

### **2. Regional Balance – see TAG's responses**

Government policy is to help rebalance the economy and this should seek to focus any growth

in aviation in the regions, within existing planning constraints and ensure that this is compatible with net zero climate targets.

- What support do regional airports require from Government?
- Where would growth in aviation best deliver economic benefit within existing environmental targets?
- What investments in surface transport are required to facilitate fewer car journeys to regional airports?

**Additionally:** PHASE considers 'expansion' to include an increase in ATMs (flights). No more flights are needed unless/until every current plane flies at passenger capacity. Certainly no more runways are needed. Those under Heathrow arrivals flight paths cannot cope with a further 40 planes a day if the current 480,000 ATMs are increased to 500,000.

### 3. Bailouts – see TAG's responses

It is likely that many aviation sector businesses will need financial assistance. The UK Government could include social and environmental objectives in any bailout approach as has happened in other European countries.

- What financial support should Government be willing to offer to the aviation sector?

**Additionally,** PHASE flags up the cultural sector which has been the last to receive financial support from Government yet has provided for the wellbeing of huge numbers under lockdown, pre-Covid-19 lockdown it contributed majorly to the health and wellbeing of the population, and moreover makes a greater contribution to the UK economy than the aviation sector, not just for the UK public but in terms of attracting overseas visitors.

- What conditions should be attached to any financial support?
- Are there any regulatory mechanisms or legislative changes required?

**Additionally,** PHASE proposes that all aircraft – **arrivals** and **departures** should be banned from flying between 10pm and 7am except in national emergencies. Human beings need sleep.

### 4. Jobs – see TAG's responses

It is vital that transition arrangements are put in place which ensure that good quality employment in the sector is protected, while also facilitating the development of the skills necessary for roles in the future.

- What level of demand is likely to return to aviation in the next few years and at what pace?
- What policy options does Government have to protect workers (particularly lowskilled and lower-paid workers) in the sector?
- What skills and training do workers require to transition into alternative sectors?

### 5. Taxation – see TAG's responses

The Government is due to review the tax arrangements of the aviation sector.

- Are existing aviation taxes fit for purpose?
- How can Government ensure that all aviation companies make a fair contribution to the reduction of emissions?
- Should revenue raised from aviation taxes be directed to investing in emissions

reductions technologies?

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## 6. Policy Framework for Decarbonisation – see TAG’s responses

In order to meet Net Zero targets there will need to be a robust framework for decarbonisation from Government with strict targets and incentives to help boost investment and innovation.

- What would these targets and incentives look like?

**Additionally**, PHASE includes specific targets for arrivals, currently operating at low altitudes for up to 20 miles from landing. Planes must remain higher for longer and descend more steeply – 5% and not 3-3.2% as currently. Airports must set specific arrivals (and departing) standard operating procedures; cf individual airlines / pilots currently choosing to set their own flight approaches and departures with no consideration for those communities over which they fly. E.g. flying at low altitudes, landing gear lowered to early etc.

- What role might be played by electric and hybrid aircraft?
- Are any changes required to the Renewable Transport Fuels Obligation?

**Additionally**, PHASE draws attention to comments made by Peter Malkin, Strategic Research Advisor at Newcastle University, on ‘green’ fuels for aviation:

*This is a complete waste of time even if it was remotely practical - which it isn't by the way. This will not solve the aviation problem. Why - well Aviation used almost 100 Billion Gallons of Jet-fuel in 2019. Work out the area required for Bio-Fuel and the CO2 in the production of SAF to make inroads on this. Secondly even if could be possible it would still mean putting exactly the same amount of CO2, NOx and Contrails into the upper atmosphere which is unacceptable. Finally do you think people when getting on an aircraft supposedly filled with SAF rather than (cheaper) Jet-Fuel will think it's OK to fly from an emissions viewpoint? Not a chance - you might as well paint the engines green it costs less and will be as useful!*

## 7. Community Impacts – see TAG’s responses which have a specific relevance to communities under arrivals flight path/s when considering the flawed SoNA study, and the poorly-understood or researched effects of steamrolling in PBN for arrivals.

The operations of aviation have significant impacts on local communities near airports and under flight paths. As demand returns to pre-pandemic levels there is an opportunity to ensure that the most robust mitigation measures are in place.

- Do current noise impact assessments consider changes in the noise environment?

**Additionally**, PHASE highlights Heathrow’s refusal to acknowledge that there have been changes in flight patterns, types of planes, hours of operation over S and SE London communities since 2016, destroying overnight the peace of whole communities who had, until then, enjoyed living in a near-plane-free environment. Moreover, noise

levels for arrivals flights are not considered relevant by DfT/CAA when considering the impact of living under a flight path where planes fly far too low over long distances before landing. This is despite the fact that SE London has Heathrow's easternmost-sited noise monitor (511:Camberwell) which records on a daily basis noise levels of 60dBI+ from 4.30am.

- What impact will the intensification of existing flight paths have on local communities?

**Additionally**, PHASE can give any number of examples of those who are already suffering under concentrated flightpaths and who will confirm the soul-destroying impact this has had on their lives. 'Minimising impact' does not mean minimising the numbers impacted. This flawed approach by Government is unjust and inhuman and singles out communities who have no choice or say in the matter yet contribute to UKplc as much as those who are not negatively impacted by these 'motorways in the sky'. At 20 miles from landing, these communities do not benefit from runway alternation meaning they have endured, pre-Covid-19 lockdown, 19 hours non-stop operations from arrivals between 4.30am – 11/11.30pm.

- How can improvements in local air quality be secured for the long term?

- What schemes or incentives are required to increase the number of people accessing airports via public transport?

- Can the impact of night flights be mitigated?

**No!** PHASE is emphatic that night flights can never be mitigated. Night flights should be banned between the hours of 10pm and 7am. We need sleep.