

## **CAP 3039 AVIATION ENVIRONMENTAL REVIEW CONSULTATION**

1. What is your name? **Richmond and Twickenham Friends of the Earth (RTFoE)**

2. What is your email address? (required): **richtwickfoe@gmail.com**

3. What country are you responding from? **UK**

4. Are you responding from an organisation or as an individual?

### **Organisation**

5. If responding from an organisation, which organisation are you representing?

**Richmond and Twickenham Friends of the Earth (RTFoE)**

6. What type of organisation do you represent?

**environmental charity**

7. Can we publish your response? (required)

**Yes**

### **AER: Ambition and Aims**

8. Please tell us to what extent you agree with the CAA's ambition and aims for the AER.

Strongly agree

**Agree ✓**

Neither agree nor disagree

Disagree

Strongly disagree

Please explain your reasoning. (required)

**We agree that all these areas need to be monitored but would like independent oversight as the CAA supports additional aviation capacity.**

### **Climate Change**

9. In addition to reporting greenhouse gas emissions from domestic flights within the UK and international flights departing the UK, are there any other relevant areas we should consider reporting on with respect to climate change in future updates to the AER?

Examples of what we could consider reporting on with respect to climate change in future updates to the AER include:

- Greenhouse gas emissions emitted from additional sources, such as aircraft support vehicles and airport terminal generators
- Greenhouse gas emissions emitted from aircraft manufacturing processes

- Greenhouse gas emissions emitted from the production and use of new and emerging fuels, such as sustainable aviation fuels (SAF)
- The impact of offsetting and carbon removal initiatives on global greenhouse gas emissions.

Please identify the additional relevant area(s) we should consider reporting on with respect to climate change in future updates to the AER and explain why this would be useful to you. If known, please provide examples of any relevant data sources and/or methodologies we could consider to inform your suggestion(s).

**Yes – all four of the above.**

**Sustainable Aviation Fuel whilst not deriving from fossil fuels still emits CO<sub>2</sub> when burned in a jet engine.**

**Offsetting and carbon removal should relate to the UK. The use of offsetting is often presented as a magic wand to get rid of emissions through tree planting, but we need to bear in mind that extreme weather caused by climate change can wipe out this mitigation. The BBC reported in Feb 2022 that more than 8 million trees in the UK had been lost that winter. Carbon stored in trees can also be released by forest fires and carbon released by cutting down trees can take around a hundred years to be recaptured by new trees. As we can't plant enough trees to absorb CO<sub>2</sub> from fossil fuel use, we need to manage demand for flying.**

10. There are various ways we can present climate change data in future updates of the AER. Please tell us how useful each of the following options would be to you.

Note these options are not mutually exclusive and may be used in combination.

Not useful/ Slightly useful/Useful/ Very useful/Extremely useful

Option 1: National Total                      **Extremely useful**

Option 2: Airport Cluster                      **Slightly useful**

Option 3: Airport                                      **Extremely useful**

Option 4: Airline                                      **Extremely useful**

Please explain the reasons for your selections.

**The national statistics are important to check the degree to which we are complying with climate targets and the airport ones show the local impact. Airlines can use their figures to adopt best practice in the fleet they use and the way they fly. We don't feel that the cluster data would be particularly meaningful.**

11. Are there any other ways we could present climate change data which you think would be useful to include in future updates of the AER, outside of those already suggested?

Please identify the additional option(s) we should consider for presenting climate change data in future updates of the AER and explain why this would be useful to you.

If known, please provide examples of data sources and/or methodologies we could consider to inform the additional option(s) suggested.

**Yes – use of bar charts to compare airport and climate change targets with year-on-year comparisons.**

## **Noise**

12. In addition to reporting the number of people exposed to aviation noise in the UK, are there any other relevant areas we should consider reporting on with respect to noise in future updates to the AER?

Examples of what we could consider reporting on with respect to noise in future updates to the AER include:

- The potential health impacts associated with noise exposure from aviation activities; and
- The effectiveness of noise abatement/reduction initiatives.

Please identify the additional relevant area(s) we should consider reporting on with respect to noise in future updates to the AER and explain why this would be useful to you.

If known, please provide examples of any relevant data sources and/or methodologies we could consider to inform your suggestion(s).

**Yes. The potential health impacts associated with noise exposure from aviation activities – particularly those under concentrated PBN flightpaths. Given that there has been no health impact assessment on these - despite knowing that repeated noise events damage the heart and we do not develop tolerance. We are sceptical about some of the noise abatement /reduction measures such as respite that is ‘worth having’ but not ‘noticeable’ but would still like to see your data.**

13. There are various ways we can present noise data in future updates of the AER.

Please tell us how useful each of the following options would be to you. Note these options are not mutually exclusive and may be used in combination.

Not useful / Slightly useful/ Useful/ Very useful/Extremely useful

Option 1: National Total            **Not useful**

Option 2: Airport Cluster        **Not useful**

Option 3: Airport                **Extremely useful**

Please explain the reasons for your selections.

**The airport directly affects us whereas the London cluster stretches from Luton to Southampton and the national total is meaningless.**

14. Are there any other ways we could present noise data which you think would be useful to include in future updates of the AER, outside of those already suggested?

Please identify the additional option(s) we should consider for presenting noise data in future updates of the AER and explain why this would be useful to you.

If known, please provide examples of data sources and/or methodologies

we could consider to inform the additional option(s) suggested.

**Yes – we would like to see more actual noise measurements using monitors directly under PBN routes rather than modelled noise contours which rely on averaged out noise.**

## **Air Quality**

15. In addition to reporting emissions from civil aviation flights and airport support machinery for the five damaging air pollutants outlined, are there any other relevant areas we should consider reporting on with respect to air quality in future updates to the AER?

Examples of what we could consider reporting on with respect to air quality in future updates to the AER include:

- Reporting emissions from additional sources, such as airport terminal generators and airport-related road traffic;
- Widening the scope of air pollutants captured by our reporting; and
- Reporting air quality concentrations of air pollution around airports and assessing this against legal air quality standards.

**Yes – all three.**

**Aircraft emit particulates, nitrogen oxides, carbon monoxides, sulphur dioxide, hydrocarbons, volatile organic compounds and black carbon.**

**Monitoring Ultra Fine Particle (UFP) levels on the ground under flight paths overflying communities at 3000ft or less. UFP from aircraft could be associated with thousands of cases of high blood pressure, diabetes and dementia. Research in 2023 by Brian Stacey et al found that the highest emission rates were from departing planes and the larger the plane the more the emissions.**

Please identify the additional relevant area(s) we should consider reporting on with respect to air quality in future updates to the AER and explain why this would be useful to you. If known, please provide examples of any relevant data sources and/or methodologies we could consider to inform your suggestion(s).

16. There are various ways we can present air quality data in future updates of the AER. Please tell us how useful each of the following options would be to you. Note these options are not mutually exclusive and may be used in combination.

Not useful / Slightly useful/ Useful/ Very useful/Extremely useful

Option 1: **National Total - Slightly useful**

Option 2: **Airport Cluster - Not useful**

Option 3: **Airport - Extremely useful**

Please explain the reasons for your selections.

**It becomes too difficult to apportion the cause to a particular airport in clusters.**

17. Are there any other ways we could present air quality data which you think would be useful to include in future updates of the AER, outside of those already suggested?

Please identify the additional option(s) we should consider for presenting air quality data in future updates of the AER and explain why this would be useful to you.

If known, please provide examples of data sources and/or methodologies we could consider to inform the additional option(s) suggested.

**No.**

#### Additional Environmental Reporting Topics

18. Not including climate change, noise and air quality, would you like to suggest any additional environmental topic(s) that the AER could report on?

**Yes, all three options:**

**The UK aviation industry's impact upon biodiversity**

**The UK aviation industry's impact upon tranquillity**

**The UK aviation industry's impact upon water quality**

Other environmental reporting topic(s): Please specify.

Please explain why the environmental topic(s) selected would be useful to you. Please provide examples of data sources and/or methodologies we could consider to inform the environmental topic(s) suggested.

**Fish, mammals and invertebrates are susceptible to light and noise pollution which can affect their ability to communicate, reproduce and to forage. Noise can also affect plant growth, pollination and ecosystem diversity.**

**Local parks and nature reserves are havens of tranquillity and Sites of Special Scientific Interest and we need to preserve these.**

**There has been a lot of concern about PFAS or 'forever chemicals' being found around UK airports and in rivers and this needs to be closely monitored.**