

Aviation Strategy Green Paper – Airspace Proposals

Response of the No 3rd Runway Coalition

April 2019

1. Introduction

This response does not seek to answer all of the questions directly but focuses on those issues that concern the communities that will be impacted by the proposed expansion of Heathrow.

Consequently, we object to the proposals as they seek to facilitate growth with little or no regard to the significant health and environmental impact of airspace changes.

It is a cause of concern for many of our members that the separation of the airspace proposals from the rest of the Aviation Strategy may pre-judge the final White Paper, thus making the consultation meaningless.

The Government should not be seeking to delegate management of noise and carbon emissions to the local level when urgent national action is required. The sovereignty of local government should not be ignored to force through airspace changes, especially where there is a limited economic or environmental case for them.

2. Views on the Proposals

The proposals have the potential to have a significantly negative impact on the quality of life of millions of people. Yet, the health and environmental impacts of aviation expansion and the introduction of highly concentrated flight paths have not been addressed, let alone tested through airspace trials.

It is hugely concerning that current DfT environmental policies are based on the CAA's SoNA 2014 survey, which relied on evidence that excludes airspace change scenarios – for the very purpose of considering the impact of airspace changes.

The WHO recommends against exposing the public to average noise levels above 45 dBLden (equivalent to circa 43 dBLAeq). However, the SoNA survey did not even consider the impact of noise below 51 dBLAeq. Consequently, there are enormous impacts that may not even be evaluated under the current governance system.

This only serves to exacerbate the lack of trust between local communities and the aviation industry.

There is an absence of accountability in the wider UK aviation sector. In particular, it is felt that the governance structures have limited understanding in addressing quality of life impacts. Nor are many of the organisation properly equipped to address the environmental challenges of airspace changes.

If the intention of the legislation is to ensure that airspace changes across multiple airports is coordinated; what impact does this have on the airspace changes proposed by Heathrow as part of their expansion plans?

3. Scope for the use of the powers

Before any new governance system is introduced, there should be statutory duties imposed on NATS and the CAA to reduce, minimise or mitigate significant adverse noise impacts of aviation.

There should be a role for local authorities in any new governance system that ensures that the impact on communities is properly considered.

4. Grounds for appeals

It is vital that revisions to the governance of airspace is the responsibility of a completely independent body. This could provide an opportunity to include local authorities and for ICCAN to be empowered with the ability to turn down airspace change proposals.

5. Funding airspace change

The aviation industry should fund all of the costs that are a consequence of its growth. This should include the full costs of mitigation of the environmental, health and social costs of airspace changes.

If social and health impacts cannot be avoided altogether, the full costs of mitigation (including comprehensive compensation packages) should be paid for by the airports – reflected and recouped through landing charges and passenger levies.

Mechanisms should be created for local communities to bring forwards their own airspace change proposals.

6. Conclusion

The proposals appear to be in conflict with aspects of Air Navigation Guidance (2017), which supports local solutions being arrived at between an airport and local communities.

The Government has no reliable evidence base with which to assess the impacts on health and the environment arising from the changes envisaged.

Further, Government has carried out no objective research into the impacts of highly concentrated flight paths. International experience shows that wherever concentrated flight paths have been introduced over densely populated areas, this has met with overwhelming opposition, and legal challenges.

These proposals appear to make the recent Heathrow airspace consultation irrelevant by the fact that the actual airspace changes will need to be coordinated with other airports, particularly Luton and Gatwick.

It remains unclear how long this process of coordination take place and it is not certain how the Planning Inspectorate will be able to make a proper assessment of airspace change proposals in the DCO process. There is significant potential for actual airspace changes to be significantly different from those proposed by Heathrow in their planning application.

This increases the possibility that communities around Heathrow will be exposed to multiple airspace change scenarios in a very short period of time.