



HACAN response to the CAA consultation on a UK Airspace Design Service

17 December 2024

Introduction

HACAN (Heathrow Association for the Control of Aircraft Noise) is a campaigning organisation formed in the 1970s to give a voice to residents under the Heathrow flight paths. We are a regional body covering London and part of the Home Counties.

The case for UKADS

HACAN believe that there was a strong case for a UKADS type entity at the start of the airspace modernisation programme. It may be a case of better late than never, but we understand that the introduction of a new entity at this stage risks creating further distance between decision makers and overflowed communities and is likely to result in further delays to public consultation on flight path system options and ultimate implementation of any changes in the future. Many of our members feel a deep sense of frustration at the length of time that the programme is taking and absence of clear information about the potential changes that will impact their lives.

In our view, producing a single Airspace Change Proposal (ACP) for the entirety of London is likely to be highly confusing for overflowed communities. It is not obvious how UKADS will ensure clarity of the consultation so that people can easily understand the multiple changes being proposed and the impact that this would have on the noise and number of aircraft movements they are exposed to. We would recommend that the changes proposed be produced as a layer to a map that is searchable by postcode and therefore directly comparable to the current day operations to assist this.

We feel that UKADS should have a responsibility to ensure that community and environmental interests are considered fully in every aspect of its remit and activities, in addition to the requirements of CAP1616. This would improve transparency and avoid any risk that community feedback is diluted or misrepresented. It is not currently evident in the proposed options that sufficient weight has been given to community engagement or wider environmental issues.

Governance

The advisory board that will form part of governance structure of UKADS is lacking either community or environmental representation. It is vital that at least two representatives of overflowed communities should be involved.

Whilst HACAN recognise that similar issues occur through the aviation governance infrastructure, the proposal for UK ADS does not make clear how appropriate separation will be delivered given that Heathrow Airport are minor stakeholders in NERL (4%). At the very least the perception of some inherent bias needs to be properly managed and a process explained for ensuring transparency in decision making.

We support the AEF recommendation that the creation of a balanced Advisory Board should include representatives of communities, other environmental experts, and local government.

It would also be welcome if UKADS had clear lines of political accountability, perhaps via a statutory role akin to the Committee on Climate Change so that regular reports to Parliament could be made, aiding transparency and understanding.

Regulatory Framework

There appears to be a lack of clarity around the precise regulatory framework that UKADS would operate in. This risks raising expectations that UKADS may be able to manage conflicts between different design principles yet compounding frustration when such management does not deliver the desired results for stakeholders.

For example, there is no single point of authority and thus no accountability between the multitude of organisations involved in aircraft noise from airports and airlines to Government departments and regulators. It is all too easy for each to say that responsibility lies elsewhere which results in frustration from community groups seeking to engage and means that securing improvements to policy is incredibly complex and slow-paced.

Environmental Impacts

HACAN have significant concerns about how the environmental and health impacts of airspace change proposals will be balanced against the operational and economic impacts. The requirements for how UKADS will address environmental impacts (beyond CAP1616 requirements) need to be agreed before UKADS is created.

We recognise that CAP1616 remains in place but would welcome greater clarity about the mechanism for assessing ACPs, how decisions will be taken on different objectives, for example noise vs emission and what expertise UKADS will need to possess to make such choices.

HACAN would like to see a full Environmental Impact Assessment of airspace modernisation proposals undertaken and published so that a specific ACP can be judged against its contribution to the expected environmental impacts. This is important as whilst HACAN recognise airspace modernisation has the potential to reduce emissions and noise pollution,

we fear that without a clear baseline and targets it will be difficult to judge the success of the programme.

Many HACAN members would like to see an ACP that includes a final option that maintains the flight paths in a roughly similar locations to today while gaining the benefits of airspace modernisation and PBN operations.

Further, the Treasury Green Book sets out specific guidance on the assessment of the introduction of new technologies as part of major public projects. It emphasises that all change options should be tested and justified against a Do Minimum baseline. The impacts of airspace change over London's dense population are potentially so huge that it is vital that all proposed changes are fully assessed within the best practice appraisal methodology and associated evidence base.

Health Impacts

The social, environmental and health problems caused by aircraft noise are well documented and evidenced. The airspace modernisation programme will result in the redesign of the flight paths across London and the South East and has the potential to introduce new flight paths, impose aircraft noise on communities that are currently not overflown and exacerbate the noise pollution endured by many others.

Many environmental noise studies are indicating that many people suffering from, or who have suffered from, mental illness are increasingly annoyed, or very annoyed by aviation noise. The need to feel safe in one's home is a basic human right and is especially crucial for those people who are particularly vulnerable to noise. Indeed, Public Health England and the Equality Commission have publicly stated the centrality of this to mental health equality and good mental health generally.

Consequently, HACAN would like to see UKADS incorporate an objective health impact assessment framework into its remit and governance structure.

Community Engagement

There currently appears to be little consideration of a mechanism for direct community engagement with UKADS.

Whilst we support the role airports play in developing their stakeholder engagement and believe it is right this is maintained, there is concern that UKADS will be perceived to be implementing the change without any recourse for local communities to articulate their issues. This places even more emphasis on airports to accurately reflect the concerns raised by communities and increases the risk of a sense of ACPS being imposed on local communities, causing frustration and disengagement. In our view, engagement should be a joint airport/UKADS responsibility.

HACAN also remain concerned about the impact the creation of UKADS will have during the current phase of Stage 3 which Heathrow are in. How much engagement will continue during this process and how much of it will be meaningful in terms of influencing the design process if UKADS can come along in a year's time and pick up responsibility as the ACP sponsor? The proposal does not provide sufficient detail on how the two processes will co-exist and subsequently feed into one another. Members of local communities give up a lot of their time voluntarily to engage with the aviation issues and particularly the complexities of airspace modernisation. It is vital that they feel their engagement is valued and worthwhile.

Economic Benefits

CAP 3029 asserts the 'economic benefits' of airspace modernisation could be achieved more quickly. The consultation does not explain how this would be delivered or to whom the benefits will accrue. It is vital that any such benefits are shared with overflown communities rather than simply assisting the aviation industry.

The projected benefits, costs and growth assumptions need to be reviewed independently and set in a context of environmental constraints. Perhaps the Treasury should be asked to consider a review of the programme to ensure compliance with the Green Book and provide an assessment of value for money?

Transition Arrangements

HACAN would like to see UKADS honour the commitments made by ACP sponsors during the stakeholder engagement processes conducted by ACP sponsors before any handover to UKADS. It is not clear how the proposals will ensure this happens.

HACAN would also welcome further information about what phase of Stage 3 UKADS would expect airports to hand over the reins and cease activity on developing their respective ACPS.

Funding

Funds from the proposed UK Airspace Design Charge should also be used to provide authoritative independent advice to communities on the impacts of proposed changes.