

Response ID ANON-GPGD-WC8X-C

Submitted to **Draft procedure for reviewing the classification of airspace**
Submitted on 2020-09-17 19:13:26

About you

A Are you responding in an official capacity on behalf of an organisation?

Yes

If yes, please tell us its name:

Richmond Heathrow Campaign

B What is your name?

Name:

Peter Willan

C What is your email address?

If you enter your email address then you will automatically receive an acknowledgement email when you submit your response:

willan829@btinternet.com

D Are you answering as:

Local organisation e.g. community action group

If you selected "member of the General Aviation community", which sub-category are you answering as? :

If you selected 'Other' for the General Aviation sub-category, please specify:

E Where do you live or where is your organisation based?

South East

F Is there anything else that you would like us to know about you in connection with your response?

Please provide your comments below:

Richmond Heathrow Campaign (RHC) represents three amenity groups in the London Borough of Richmond upon Thames: The Richmond Society, The Friends of Richmond Green, and the Kew Society, which together have over 2000 members. The members of our amenity groups are adversely affected by noise from Heathrow Airport's flight paths, poor air quality and road and rail congestion in west London. We acknowledge Heathrow's contribution to the UK economy and seek constructive engagement in pursuit of a better Heathrow. We are an active participant in the Heathrow Community Noise Forum

G Do you consent to your response being published?

Yes, with personal identifying information (name, organisation, respondent category, location, additional information - please note your email address will NOT be published if you choose this option)

General

1 Do you have any general comments about our proposed new procedure?

Please provide your comments below:

We welcome the initiative of regular consideration of airspace classification and formal procedures with established decision objectives and criteria.

1. Environmental consequences are given inadequate consideration by the CAP 1934 proposed procedure. Para. 2.34 says "We do not anticipate that this procedure will be used for any change that causes measurable environmental impacts, such as changes to departure and arrival routes at aerodromes." Surely, there is a lot of airspace from zero to 7,000 ft and even up to 10,000 ft where air traffic (fixed wing, helicopter, etc.) can create significant noise impact on people on the ground and potentially place them at risk from air classification changes as well as from CAP 1616 Airspace Change Procedures (ACPs). The SOS letter in para. 2.14 exempts the CAP 1934 procedures from being governed by Air Navigation Guidance 2014 and 2017 and later. RHC finds historically that, notwithstanding Section 70 Statutory environmental requirements placed on the CAA, environmental consequences are not given sufficient weight in CAP 1616 and other airspace decisions.

2. RHC recommends with regard to CAP 1934 procedures that:

- a. greater account be taken of noise, air pollution and CO2 in airspace decisions.
- b. greater emphasis be given to timely consultation and engagement with communities potentially affected by the environmental impact from airspace re-classification, and
- c. greater independent contribution/oversight be included in the procedure, for example, from ICCAN on noise and the UK Committee on Climate Change on CO2.

There are potential conflicts of interest within the CAA arising from the procedure. Also there are not likely to be all the in-house skills and expertise required.

3. There is a major airspace design issue concerning optimising the classification and airspace use by 14 airports and Heathrow in the southeast whereby each airport seeks to use the same airspace. While CAP 1616 ACPs are being used, these are essentially on an airport by airport basis with there being difficulty in producing an integrated approach. The exclusion of the CAP 1934 procedures where CAP 1616 ACPs are employed surely will result in less than optimal operating and environmental decisions. For example, some people living around Heathrow are exposed to noise directly from Gatwick traffic and/or indirectly by Heathrow flights being lowered to accommodate Gatwick flights. RHC recommends the optimisation be the role of the detailed CAP 1616 procedures applied to each airport, while CAP 1934 procedures be used to ensure there is "global" optimisation. At the moment this role does not seem to be part of CAP 1934 procedures, at least in any clearly defined way. We are not talking here only about the classification itself but about operational use of airspace, which we understand is part of CAP 1934 procedures.

4. We believe greater clarity needs to be given to the objectives in the procedure for reclassifying airspace. Safety is understandable paramount. Capacity is often quoted but RHC is sceptical of the weight given to operational resilience and punctuality as grounds for increasing capacity in controlled lower airspace. Because RHC does not support Heathrow expansion we do not support increased lower and terminal airspace capacity, other things being equal. But we believe PBN and other technical advances will result in substantial changes to the way airspace is used and in increased capacity. We appreciate that CAP 1934 is not about defining policy objectives but it is about their use and there is a great vacuum at the moment due to the deferral of the government's Aviation Strategy. We are therefore concerned at use of the procedures until objectives and Aviation Strategy are properly established. RHC strongly believes the procedures should not result in increased noise impact but reduced noise impact through dispersion. This probably requires more controlled airspace and indeed we strongly believe there is insufficient airspace to accommodate Heathrow expansion on account of the increased noise impact in the limited available airspace. For economic and environmental reasons recovery from CV-19 and subsequent growth should be dispersed across the UK.

5. We believe that robust projections and modelling should be central to the procedures. This is difficult because of CV-19 and the ever lowering climate change ceiling and its impact on aviation. This might usefully be given greater weight in the procedures.

6. We are less enthusiastic than seemingly the CAA is about building flexibility into the use of airspace on environmental grounds. Generally, when considering the noise issue, people on the ground prefer some certainty. If by flexibility it is meant changing within a fixed pattern of use (such as flight path alternation) that might be welcome as a form of dispersion but unpredictable change of use at night time is unlikely to be welcome.

7. We encourage the CAA to develop an air classification portal at the start (as it has done with ACPs) so that everyone can have the same easy access to the relevant information.

Consider stage

2 Do you have any comments about our proposed approach for the Consider stage?

Some modifications needed

Consider - some modifications

Please provide your modifications below

modification comments:

Please also see our response to question 1

RHC's questions whether a two year cycle is feasible. We appreciate the keenness to make progress but some of the airspace classifications may be complex and require substantial resources and practically three years may be preferable.

Review stage

3 Do you have any comments about our proposed approach for the Review stage?

Some modifications needed

Review - some modifications

Please provide your modifications below

modification comments:

Please also see our response to question 1 and in particular on community consultation and engagement and the environment, objectives and projections.

Amend stage

4 Do you have any comments about our proposed approach for the Amend stage?

Some modifications needed

Amend - some modifications

Please provide your modifications below

modification comments:

Please also see our response to question 1 and in particular on the environment, objectives and projections.

Cost impacts

5 Please can you quantify the cost impacts of the new procedure on your organisation, or more broadly if possible, and how we might best minimise these?

Please provide your answer below:

Good communication and transparency helps reduce the costs to our organisation