

Response ID ANON-36W1-E5GX-A

Submitted to **Airspace classification review 2019–2020**

Submitted on **2020-03-03 18:53:33**

About you

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

Yes

2 If yes, please tell us its name.

If yes, please tell us its name.:

Richmond Heathrow Campaign

3 What is your name?

Name:

Peter Willan

4 What is your email address?

Email:

willan829@btinternet.com

5 Are you answering as:

Local organisation e.g. community action group

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

If you are from the commercial aviation industry, which sub-category are you answering as?:

If other please specify:

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

South East

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

Anything else?:

Richmond Heathrow Campaign (RHC) represents the interest in Heathrow of three amenity groups: The Richmond Society, The Kew Society and the Friends of Richmond Green with in aggregate over 2,000 members.

www.richmondheathrowcampaign.org

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(name, organisation, respondent category, location, additional information - please note your email address will NOT be published if you choose this option)

Identifying opportunities

Opportunity 1

9 Airfield control zone e.g. the name of the airfield

Airfield control zone:

Heathrow

10 Flight Level e.g. FL60

Flight Level:

All up to FL100

11 Area that is underused e.g. North-west area

Area that is underused:

South East

12 Is there a particular time when the classification could be amended? e.g. 11am at weekends

Is there a particular time when the classification could be amended?:

No

13 Which diagram in our evidence base shows the area? e.g. South, Summer, weekday, FL60

Which diagram in our evidence base shows the area?:

South Summer & South Winter

14 What is your rationale? Please share any evidence you have about the opportunity

What is your rationale? Please share any evidence you have about the opportunity:

1. Currently there is significant air traffic congestion in the lower airspace up to 7,000 feet and in lower levels of terminal airspace above 7,000 feet over London and its surrounds due to 15 airports, including Heathrow, Gatwick, London City, Luton and Stansted, seeking to use the same limited controlled airspace. Richmond Heathrow Campaign (RHC) believes the delays and cost caused by congestion are overstated but we accept that congestion is significant and growing.
2. Future growth in air travel from London's five airports will make the congestion worse, although this growth may be tempered by restraint needed to limit carbon emissions and by sharing of growth with regional airports. Growth has become significantly less certain with the Appeal court's decision on 27 February 2020 declaring parliament's support of a 3rd runway at Heathrow to be unlawful and also with the requirement for increasing restraint on carbon emissions. Nevertheless, some growth in the number of flights, even if increasingly uncertain, is expected and therefore so is the worsening of air traffic congestion.
3. Demand for flights and airspace capacity determine the congestion. To some extent the scarcity of capacity can be mitigated by airspace modernisation that improves efficiency and which is underway. Technology is a key to modernisation with satellite navigation replacing ground based navigation. Performance Based Navigation (PBN) concentrates flights thus requiring multiple routes to disperse noise. The lateral space needed to achieve noise objectives using PBN may be greater than achieved with the current random dispersion around SID departures and STAR arrivals thus requiring even more controlled airspace.
4. Aircraft noise causes unacceptable harm over London and its surrounds. Concentration of flight paths could increase the capacity and reduce congestion but RHC and many communities are wholly against concentration and seek dispersion. In fact, we doubt there is sufficient controlled airspace to provide sufficient flight path separation for meaningful noise mitigation within 25km of Heathrow. Noise from aircraft using the several London airports means there is a cumulative impact from overflight and is further reason not to reduce controlled airspace. If anything the controlled airspace needs to be enlarged.
5. Even were it feasible to reduce controlled airspace over London and its surrounds, the replacement of commercial aircraft with general aviation (gliders excepted) would risk replacing noise from commercial aircraft with noise from small aircraft at a relatively low level and at an intensity that still disturbs communities on the ground.
6. The airspace change process for Heathrow's expansion is not scheduled for completion before 2023 and even were Heathrow expansion not to take place, airspace modernisation is likely to take as long and CAP 1711 targets 2024. We believe the design of airspace should assume no reduction in controlled airspace. Furthermore, the demand and design uncertainties surely create a serious risk to premature re-allocation of controlled airspace to un-controlled airspace for general aviation.
7. Safety should always be a priority and while Heathrow is recognised as relatively safe, flights are over densely populated areas and we have serious concern with adding complexity to the airspace by for example re-classifying the airspace depending on time of day. We are also concerned at integrating different user groups and commercial aviation in common airspace, even with enhanced navigation and surveillance.
8. In conclusion, we do not see a reduction in controlled airspace over London and its surrounds as feasible given the existing aircraft congestion, the growing demand for flights and the imperative for flight path and hence noise dispersion.

Upload supporting files:

No file was uploaded

Opportunity 2

15 Airfield control zone e.g. the name of the airfield

Airfield control zone:

16 Flight Level e.g. FL60

Flight Level:

17 Area that is underused e.g. North-west area

Area that is underused:

18 Is there a particular time when the classification could be amended? e.g. 11am at weekends

Is there a particular time when the classification could be amended?:

19 Which diagram in our evidence base shows the area? e.g. South, Summer, weekday, FL60

Which diagram in our evidence base shows the area?:

20 What is your rationale? Please share any evidence you have about the opportunity

What is your rationale? Please share any evidence you have about the opportunity:

Upload supporting files:

No file was uploaded

General comments

21 Please share any general comments you have on the review and project.

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