

**Proposed Criteria for Assessing and Accepting the Airspace Change Masterplan
CAP 1887
Response from Richmond Heathrow Campaign 26 June 2020
Response on CAA digital portal**

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

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.

8. CAP 1887 details the proposed criteria to be used to inform whether to accept the Airspace Change Masterplan, which is being created by the Airspace Change Organising Group (ACOG), an impartial team in NERL. Do you have any general comments you would like to share on the proposed criteria for assessing and accepting the Airspace Change Masterplan?

(1) Airspace Modernisation: We support the aims to improve safety, provide capacity to improve efficiency and resilience and to reduce environmental impact - noise, air pollution and carbon emissions. We accept there may be a need to reallocate airspace between controlled and uncontrolled airspace according to need and other factors. **From the evidence we have seen over recent years on the need for airspace (e.g. Airports Commission Report and Airports National Policy Statement) we believe modernisation should focus on better airspace structure and use and that too much emphasis is given to aviation growth and not enough to reducing the environmental harm.**

(2) The Masterplan (as a tool for achieving modernisation) should first seek to establish the need for additional airspace and the need for change across the UK taking account of the aims raised in paragraph 1 above. The available estimates of airspace demand are seriously out-of-date, not least because of increasing restrictions on aviation from climate change but also because of the long term consequences of the covid-19 pandemic. Runway capacity and its allocation across the UK is now very uncertain, given the legal, economic and financial challenges to Heathrow's expansion. There is an interdependence of runway and airspace capacity and use. When assessing airspace capacity and its distribution it is essential that the environmental impacts are also assessed. Distributing air traffic across the UK disperses air pollution and noise. **We believe the Masterplan should go back a step and re-evaluate the need for airspace capacity and its distribution and likewise for the environmental impacts.**

(3) We strongly recommend not starting with a blank piece of paper when designing airspace but taking what exists today and modifying it only as necessary. We say this not least because communities affected by aviation noise find it difficult to assess the impact from design principles - they want simply to know what will be the noise impact on their community.

(4) We see the Masterplan as enabling and controlling the modernisation at a strategic level, which means across the UK and over the long term. We see the Masterplan as being a framework to manage the decision process rather than itself making the decisions on individual flight paths or the optimisation of multiple flightpaths. That should be for CAP 1616. **The Masterplan should set the overall targets and common decision criteria for the detailed CAP1616 flightpath design and seek ‘global optimisation’ taking account of dependencies and conflicts while delegating optimisation of individual flight paths and flight path integration to CAP 1616.** We agree there will need to be trade-offs. Dividing the flightpath designs between CAP 1616 and the Masterplan cannot do anything other than cause confusion and uncertainty and sub-optimal outcomes.

(5) **CAP 1616.** On many occasions in the past we have raised concerns with the CAA and DfT on the deficiencies of CAP 1616 - for example: the fact that need is not taken into account, the absence of a national or local noise objective that allocates noise across communities, the unsatisfactory treatment of flight frequency, respite, and noise metrics, noise health impacts and the deficiencies of WebTAG’s noise evaluation. Multiple flight paths need consideration of altitude based priorities (vertical separation) and flight path lateral separation. We believe the 7,000 ft band is too low and should be nearer 10,000ft. The separation is very relevant to respite from overflight and noise impact on communities **These issues need to be resolved urgently and not just assumed by the masterplan.**

(6) **Integration of the Masterplan and CAP 1616.** We are far from convinced that CAP 1887 establishes a coherent allocation of decisions between the Masterplan and CAP 1616 airspace changes. There needs to be common objectives, principles and decision criteria but also:

- a. It is not clear how anomalies between the two will be resolved,
- b. ACOG appears to be involved in the design detail instead of focussing on co-ordinating the decision programme,
- c. Greater flexibility of CAP 1616 timetables should be allowed.
- d. Individual Trade-offs should be dealt with by CAP 1616 and not by the Masterplan,

(7) **Masterplan Iteration process.** Broadly we support the iteration process but not the division of the process between the four iterations. We believe public consultation should be brought in much sooner and preferably at the flightpath decision node, which we suggest above should be part of the CAP 1616 process rather than part of the Masterplan. With our emphasis on CAP 1616 we urge the CAA to align Masterplan consultation with that prescribed by CAP 1616. Consultation processes aligned separately with the Masterplan and CAP1616 processes can only lead to confusion and irrational decisions.

9. Are the proposed criteria detailed in CAP 1887 the right criteria to enable acceptance?

(8) **Environment.** The emphasis of the Masterplan is optimisation from an industry commercial perspective and we do not think it gives enough attention to protecting the environment and the impact on communities.

(9) We support CAP 1887 in its inclusion of flexibility in the Masterplan so as to deal with longer term uncertainty and risk but question whether sufficient flexibility is built in so as to

deal with CAP 1616 airspace changes.

See also our response to Q8 and Q10

Significant Modification needed

10. Chapter 3 of CAP 1887 details the policy considerations that are relevant to the Airspace Change Masterplan. Are there examples of where further policy may be required to guide trade-off decisions?

(10) Aviation Strategy. We appreciate CAP 1887 is about establishing the Masterplan process rather than its substance but we strongly urge the Government and CAA to question the benefit to the UK of international-to-international transfers and their substantial distortion of demand at Heathrow. We also urge consideration of the impact of climate change and other factors on concentration of growth at Heathrow rather than dispersion across the UK. We urge consideration be given to purpose of travel (business, leisure, etc) and to the destinations served from the UK. We believe better surface access to London's five airports and other airports should be a priority. These all have direct or indirect links with runways and airspace structural and operational design. We believe until an up-to-date Aviation Strategy that considers these issues is developed, modernisation of airspace will be on weak ground with deficient policies. We believe the Airports National Policy Statement 2018 is potentially redundant and the Masterplan should not rely on it for Policy Guidance.

(11) Noise Objectives. On many occasions we have expressed our deep concern to the CAA and the DfT at the absence of a national or local noise objective that allocates noise across communities and determines concentration or dispersion. This persistent policy failure can only lead to unsatisfactory assessment of noise impact from flightpath design.

11. Chapter 4 of CAP 1887 details the engagement expectations for the Airspace Change Organising Group (ACOG) to undertake. Do you have any comments on the engagement we are asking ACOG to undertake?

(12) Community Engagement. We are concerned that the Masterplan key players are from the aviation industry and that there is insufficient provision for community engagement and involvement in the Masterplan process. Our experience of Heathrow's engagement with local communities in the CAP 1616 process leaves a lot to be desired. Decisions and submissions to the CAA were made before communities were consulted and without the opportunity to question Heathrow's interpretation of survey responses. We are not confident the Masterplan will be any better. We are not clear how engagement on the Masterplan and CAP 1616 inter-relate.

(13) CAA, NERL and ACOG responsibilities. We do have concerns with the independence of the key stakeholders in the process and the absence of community representation.

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