

Department for Transport

Via email to airspace.policy@dft.gsi.gov.uk

I welcome the opportunity to respond to the Government consultation on UK airspace policy which has important implications for London.

Aviation plays a vital role for the London and UK economy. Growth in flights is increasingly constrained by airspace capacity and it is appropriate that we look at how to modernise the airspace and take advantage of new technologies. This is also a question of fulfilling our international obligations as part of the Single European Sky programme.

Aviation growth cannot be at any cost. The noise impacts on local communities must be a central consideration in all aspects of aviation policy. Any changes to airspace must be based on the principle of consent. Hundreds of thousands of Londoners are exposed to significant aircraft noise and many feel that their understandable concerns are ignored. The Mayor and I am keenly aware of the frustration of many when noise complaints are not properly dealt with and no aviation organisation, public or private, appears willing or able to take ownership of the issue.

Quite simply, what we find in local communities is a fundamental lack of trust. If airspace changes are to be taken forward, then it is essential we address this head-on.

Key to resolving this is an independent aviation noise regulator, able to set the noise framework, monitor compliance and – crucially – enforce its decisions, with the power to impose penalties if required. The Airports Commission recognised as much when it called for an independent aviation noise authority. Such an independent noise regulator could hold the industry to account and ensure the concerns of local communities are properly tackled.

Instead, the Independent Commission on Civil Aviation Noise ('ICCAN') being proposed is a body which is to be a part of the Civil Aviation Authority (CAA). It will have no enforcement powers and can expect to be wound down after five years. Established on such a flawed basis, this body would struggle to gain the public's trust.

The lack of trust has been all too evident in the public response to airspace modernisation to date. The process at Gatwick Airport had to be suspended, while the changes at London City Airport have been the source of considerable public anguish and consternation. These problems are likely to be multiplied when Heathrow Airport has to go public with similar airspace changes in due course. While the Mayor's office has urged the airport and the CAA to resolve these issues as a matter of priority, Londoners are understandably frustrated that even elected representatives seem unable to resolve their concerns.

Moreover, Government has, so far, failed to provide sufficient guidance as to how to implement the new, more precise flight paths that are associated with the new technology, whether that means the concentration or dispersal of flightpaths. I welcome the recognition that concentration – as has been implemented at London City Airport – can have very negative impacts on those directly under the more precise routes being flown. Unfortunately, the draft policy is less clear on how to proceed. It states that:

“It will on occasions be better to have multiple concentrated routes that share noise among more people, than a single concentrated route which affects fewer people to a greater extent, providing large numbers of people are not exposed to aircraft noise for the first time.” [UK Airspace Policy consultation, 5.13]

In an area as densely populated as Greater London with the scale of its airports' operations, it is impossible to implement multiple concentrated routes without exposing many new people to noise.

In promoting its expansion plans, Heathrow Airport, has sought to massage down the numbers of people exposed to noise by assuming future airspace changes and implementing multiple routings in its noise modelling. The airport uses this to show a decrease in total numbers exposed compared to today. However work commissioned for Transport for London (TfL) shows that 200,000 more people are exposed by a three-runway Heathrow than if the airspace changes were implemented for a two-runway Heathrow. In any case, Heathrow Airport's approach (with or without an expanded Heathrow), still results in around 100,000-300,000 people being exposed to significant aircraft noise for the first time.

I support the proposal that, in future, a number of airspace options will need to be evaluated and presented for consultation. This will promote transparency in decision making but a decision will still need to be made. What is required is clear Government policy guidance to inform these decisions and this is still lacking. Giving the Secretary of State the power to call in decisions does not resolve this.

If Government is moving towards more dispersal of flights, it is essential that this is taken forward in conjunction with a smarter suite of noise metrics that better reflect the noise exposure experienced by those under the new flightpaths. A single average noise metric (as currently used) understates the noise exposure under a dispersal approach because the noise from even an intense period of aircraft overflying is averaged across the whole measurement period, including when aircraft are being routed elsewhere.

If airspace change is to be delivered, it must be with the consent of local communities. As we navigate this critical juncture, there is a vital role to be played by a noise regulator, perceived to be truly independent and with the powers of enforcement to defend the

public interest in a balanced way. It will be a missed opportunity if Government fails to establish such a regulator: a decision which industry and public alike will come to regret.

Yours sincerely,

Val Shawcross CBE
Deputy Mayor for Transport