



## **Transport Select Committee Inquiry into Airspace Use Aviation Environment Federation Response**

### **Who we are:**

The Aviation Environment Federation (AEF) is the principal UK non-profit making environmental association concerned with the environmental effects of aviation. It promotes a sustainable future for aviation which fully recognises, and takes account of, all its environmental and amenity effects. These range from aircraft noise issues associated with small airstrips or helipads, to the contribution of airline emissions to climate change.

The AEF was established in 1975 because of growing concerns about noise from private aircraft. This remains an important part of AEF's work, but in recent years increasing attention has been focussed on the impacts of commercial aviation. AEF is a membership organisation which provides an advice and information to its members. We have over 120 affiliated members comprising community and environmental groups, local authorities, parish councils, businesses and consultancies and individuals.

The document below sets out our key responses to the call for evidence, and then more detailed responses to the questions contained in the call for evidence. Appendix A contains a numbered list of the questions AEF has responded to.

### **Key recommendations:**

- Independent research is required to revise growth forecasts to the point where a sufficiently robust Airspace Master Plan would be feasible.
- An Airspace Master Plan should contain comprehensive mapping of airspace blocks and projected traffic flows, assessment and projection of current and future emissions and strategies for reducing these, more clarity on the issue of rural/urban routing, strategic guidance on the preservation of Areas of Outstanding Natural Beauty and National Parks, and projections for the maximum efficiencies that can be achieved in case of increased capacity/usage
- Airspace change proposals should be closely tied to land use planning, managing any planning restrictions or environmental impacts through thorough local consideration and the effective communication of alternative measures. Airspace management it must be brought forward in the planning process, if necessary, with outline permission being gained before further planning consideration is undertaken.
- The effects of aircraft noise and emissions on local populations are not given equal consideration with capacity. There should be accepted thresholds for

environmental impacts which, if exceeded, would invalidate Airspace Change Proposals (ACPs).

### **Detailed Responses:**

1. AEF does not have the expertise to comment on all the details of airspace management, however, we are concerned with its environmental implications. As an overall remark we believe this consultation is premature, as growth levels and the structure of the industry are in flux. Revised forecasts are required to ensure no non-essential capacity is built, thus reducing pressure on airspace operators to increase capacity to unsustainable levels. We have asked the DfT to provide revised forecasts before any capacity decisions are made.

2. The extent to which safety may be compromised depends partially on the congestion of routes. Care should be taken to ensure that safety standards do not lapse to increase capacity, and that penalties against level-busts etc are severe. While our members understand the focus on safety, decisions on the location of new capacity will influence the size and shape of Public Safety Zones, and thus planning decisions. More detailed strategic guidance, formulated with comprehensive consultation and independent research is needed over the viability and impacts of rural routing being used in preference over urban areas.

3. The planning and regulation of UK airspace requires long-term strategic support. Providing comprehensive, independent evidence is used for its construction, an Airspace Master Plan covering the period of the White Paper would be beneficial. Piecemeal approaches to individual developments and any subsequent redesigns should be considered under the strategic framework of the Airspace Master Plan, which should be non-site-specific, and used alongside the Air Transport White Paper 2003. Without this, it will be difficult to determine if the White Paper projections can be safely met.

AEF envisages any airspace Master Plan would contain comprehensive mapping of airspace blocks and projected traffic flows, assessment and projection of current and future emissions and strategies for reducing these, more clarity on the issue of rural/urban routing, strategic guidance on the preservation of Areas of Outstanding Natural Beauty and National Parks, and projections for the maximum efficiencies that can be achieved in case of increased capacity/usage. Airspace changes should have closer links to land-use planning. Where increased airport capacity is proposed, airspace should be considered in parallel, with mapping available to consultees, but no formal planning status.

4. The effects of aircraft noise and emissions on local populations are not given equal consideration with capacity. The Environment Agency should be a key consultee. There should be accepted thresholds for environmental impacts which, if exceeded, would invalidate Airspace Change Proposals (ACPs). The degree of environmental information provided by National Air Traffic Services (NATS) has improved, yet still remains inadequate overall. ACPs consistently undervalue the importance of reductions in noise and emissions. Research into degrees of intrusiveness of air routing is not yet robust enough for the formulation of proper policy guidance, resulting in a shifting of environmental impacts, rather than solving them. More sophisticated guidance is required from the DfT, and a revision of current guidelines for airspace planning. At present, the focus on concentration and minimising the number of people affected by aircraft noise, fails to recognise emerging environmental policy, not least the protection of tranquil areas.

5. Better integration with EU airspace is necessary if coastal stacking is to be an option. A single integrated EU airspace block would increase efficiency, for example by allowing direct routing between states, and we urge the UK Government to continue to push for an agreement on the Single European Sky.

6. If the Terminal Control North consultation is a good indicator of technology being used to achieve environmental benefits, then it is clear that such benefits are minimal when compared with the environmental impacts of the capacity growth envisaged, for the South East in particular. Greater emphasis should be placed on maintaining environmental standards, which should not be considered as subsidiary to capacity constraints. It is disappointing that the increasing use of CDA and PR-Nav technological advances have not led to parallel environmental gains. Many of the initiatives presented served to move the environmental impacts rather than resolve them, with the resultant capacity increases leading to an overall increase in emissions—a highly unsustainable position if the aviation industry is to counter its climate change costs.

7. NATS, as a source of expert advice and data need to enhance their role in the planning process. NATS concerns about capacity limitations should take precedence over externally set growth targets. In order for the CAA to strengthen its reviewing process of actual operations, it must demonstrate its possession of the resources to enforce Airspace Change Sponsors to follow CAP725. Areas of responsibility should be clearly delineated. Better definition of these roles would lead to increased transparency and democratic accountability. The DfT should provide strategic objectives for Air Space Managers.

8. Under current arrangements, airspace management is given no consideration in airport development proposals; it must be brought forward in the planning process, if necessary, with outline permission being gained before further planning consideration is undertaken. This is why new National Policy Statements on airport planning should contain a fully comprehensive Airspace Master Plan. CAA/NATS role in the planning process should be strengthened as suggested above. Where consultations are carried out on expansion, basic Airspace Change mapping should be included, to increase public awareness of areas affected.

This is a fundamental flaw with the present approach. For example, the Government consulted widely on the airport expansion proposals presented in the 2003 ATWP, but airspace considerations were confined to a few paragraphs stating simply that: *“The Government will now look to the CAA to make early progress in bringing forward a structured programme for the redesign of UK airspace, with a view to the phased implementation of changes to eliminate constraints and permit the integration of the forecast increases in aircraft movements, including traffic using the additional runways proposed in this White Paper”* Those being consulted now by NATS, were not necessarily those impacted or consulted by the airport expansion options in the ATWP. This has confined the NATS consultation to questions of “where” rather than allowing communities to voice concerns about the general volume of traffic.

9. With increased commercial capacity, viable Class G airspace for recreational and private flying could decrease. The erosion of uncontrolled airspace could bring recreational aircraft lower, and/or create more intensive corridors as aircraft navigate around controlled areas. This would create problems with increased noise and emissions in these areas. General Aviation has its own environmental considerations, which will not be mitigated by constraining its operations.

10. Personnel issues should be resolved by greater collaboration and training initiatives between the CAA and NATS. For greater integration with land use planning issues, collaboration with Local Authority planners will be necessary.

11. Those benefiting from additional airspace capacity should fund changes. If carriers want greater capacity, they should meet the costs associated with the investment in safe routes- the same applies to airports looking to attract more carriers. Central government backing should be made available to ensure safety standards are maintained, conditional upon consideration of environmental mitigation measures, and maximizing environmental benefits.

**For more information or to discuss our submission, please contact:**

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## Appendix A

1. What changes to the management of airspace could be required as a result of the additional airport capacity outlined in the 2003 White Paper? Are the White Paper's projections for increased passenger demand still accurate? Are all the measures to provide for increased passenger demand likely to be implemented?
2. Can safety be maintained as airspace is increasingly utilised?
3. Is the current approach to planning and regulating the use of UK airspace adequate? Would an Airspace Master Plan covering the period of the White Paper be beneficial? Could a piecemeal approach to individual developments necessitate additional redesigns subsequently?
4. How are the effects and aircraft noise and emissions taken into account when changes are made to the use of airspace? Who should be consulted about such changes? How should the balance between conflicting interests be struck?
5. How does the management of airspace in the rest of Europe affect flights into the UK? Is there an opportunity to integrate our plans for changes to airspace management more effectively with those of other European countries?
6. What opportunities are there to apply new techniques and technologies to reduce wasteful flying on indirect routes and excessive 'stacking' while planes wait to land? How can the potential of any such opportunities best be realised? Could environmental benefits be gained as a result of such improvements?
7. In relation to the redesign of UK airspace, is the allocation of the roles and responsibilities of each of the interested parties—Department for Transport, the CAA, airport operators, NATS, etc—appropriate and clearly understood? Are the structures of the parties appropriate for undertaking the roles that they should play?
8. Do airspace management considerations delay the planning processes in relation to airport development proposals? How will airspace management considerations be taken into account by the proposed new Infrastructure Planning Commission and the relevant National Policy Statements on airport planning?
9. What could be the implications for smaller airfields, recreational flying and helicopters of changes to airspace management to enable safe and efficient increases in capacity at the UK's major airports? How should an appropriate balance between conflicting priorities be determined?
10. Will it be possible to recruit and train staff in order that airspace changes can be implemented in parallel with additional airport capacity?
11. Who should fund airspace changes? Is there likely to be enough funding to undertake the redesign required to bring about the necessary additional airspace capacity?