



## Airspace Policy Consultation

### LAANC Advice Note

This consultation was launched simultaneously with the draft NPS and runs for the same 16 weeks. The consultation closes on the 25<sup>th</sup> May 2017.

#### The consultation can be found at:

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/589099/uk-airspace-policy-consultation-executive-summary.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/589099/uk-airspace-policy-consultation-executive-summary.pdf) (summary)

Responses to be emailed to [airspace.policy@dft.gsi.gov.uk](mailto:airspace.policy@dft.gsi.gov.uk)

There are a number of documents published by the CAA alongside the main consultation which are relevant to the consultation. The following links go direct to the CAA website where they can be viewed and / or downloaded:

- [CAP 724 Airspace Charter](#)
- [CAP 725 Airspace Change Process Guidance Document](#)
- [CAP 740 UK Airspace Management Policy](#)
- [CAP 778 Policy and Guidance for the Design and Operation of Departure Procedures in UK Airspace](#)
- [CAP 785 Approval Requirements for Instrument Flight Procedures for use in UK Airspace](#)
- [CAP 1356 Helios report](#)
- [CAP 1389 Proposals for a revised airspace change process](#)
- [CAP 1465 Outcome of the CAA consultation on proposals for a revised airspace change process](#)
- [CAP 1465b Airspace change process information pack](#)
- [CAP 1498 Definition of overflight](#)

#### Relationship to NPS Consultation

The Government has decided to consult on its proposals for air space modernisation concurrently with the NPS consultation.

The engagement events for the NPS will also seek residents' views. At this stage it seems unlikely that any new meaningful information of the location of future Heathrow flight paths with a 3<sup>rd</sup> runway will be available. In the absence of this information it is difficult to see how the Heathrow / NPS consultation can be fair.

This consultation is not Heathrow specific – it is a national consultation that seeks views on:

- a) The principles of how flight paths are introduced;
  - b) The “concentration” of flight paths;
  - c) The key areas where noise should be given priority over other issues;
  - d) A new Independent Noise Authority; and,
  - e) Revised metrics to assess noise annoyance.
- Flight paths require modernisation as DfT claims that the current arrangements are inefficient. Most aircraft are now equipped with new technology that enables them to fly

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along precise pre-determined pathways. The DfT says that *“Inefficient airspace arrangements also mean more emissions from longer journeys and prevent improvements being made that could reduce noise for communities around airports, for example by removing the need for holding stacks for aircraft unable to land and making better use of new technologies which allows aircraft to better avoid overflying populated areas”*.

- 2024 is the target date for modernising airspace at Heathrow and this will involve changing a lot of the flight paths. This date would be a year before a 3rd runway would be operational. However the DfT claims that London airspace modernisation is required whether there is a 2 runway or a 3 runway airport at Heathrow. It is however clear from the Airports Commission work in 2015 that a second runway at Gatwick could be accommodated within the current general London air space arrangements without the need for wholesale revisions as will be required for a 3 runway Heathrow.
- Revisions to flight paths (including their concentration - PRNAV) have already generated controversy where flight path changes and concentrations have been trialled from Heathrow (Teddington and Ascot for example). The concentration of routes from London City Airport in 2016 also impacted adversely on East London residents. These changes are now viewed as permanent and many complaints are being made about this.
- The CAA admits that some of its PRNAV trials were undertaken without effective consultation with local communities. This consultation seeks views on how engagement with affected communities should happen in future.
- The use of **multiple routes** being offered as a technical option to avoid concentration over particular communities. However government policy is not to favour such initiatives.
- The formation of an **Independent Noise Authority** - Although this to be a fully independent body it is proposed that this be advisory rather than regulatory (unlike that envisaged by the Airports Commission which said such a body should have real teeth). Funding would come from Government to pay for a Board and a Secretariat. It is envisaged that the Noise authority will sit within the CAA but independent of it. LAANC is concerned that this waters down another key recommendation of the Airports Commission and that without statutory enforcement powers its effectiveness is questionable at least.
- **Noise should be the key issue** – but the consultation is proposing that this should only apply to locations that are impacted by flights below 4,000 ft and only one of the factors between 4,000 and 7,000 ft. This is a continuation of the current policy which fails to recognise that with concentration of flight paths aircraft noise will become an issue for communities some distance from the airport. Repeated overflights in suburban areas even at 8000ft are clearly audible and more than 20dB above background noise levels and can be predicted to cause annoyance in the future where such events become concentrated. The consultation claims that noise is not an issue above 7000ft. Whilst this is current government policy it is unclear on what evidence this is based.
- **Noise Metrics – The 57 decibel contour.** There is discussion on the 57 decibel contour which the government treats as representing ‘the onset of significant community annoyance’. The 57 decibel contour has been much criticised as being out calibration

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for at least 20 years. In London, for example, the 57 dB contour currently does not encompass communities such as Putney and Fulham where aircraft noise is clearly a problem. It appears this has at last been recognised by Government.

- **Noise Policy** - The DfT will need to update its policy on community annoyance particularly in the light of the CAA publishing the results of a 2014 social survey of attitudes to aircraft noise in England (SoNA 14). This study in itself will need careful analysis but it can be seen from a brief initial review that the 54dB or 51dB contour would better represent the onset of community annoyance.