

# LAANC

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Dear Mr Rapson

## Consultation Draft - Future Airspace Strategy for the UK 2011 - 2030

Thank you for the opportunity to comment on the above draft document. The Local Authorities Aircraft Noise Council was founded in the 1960s as an umbrella organisation representing the interests of residents around Heathrow. LAANC's objectives are to examine all problems arising from any type of pollution or nuisance from aircraft which may affect Member Authorities. We are affiliated to and provide technical support for the 2M group of local authorities. Further information about LAANC can be found on our website: [www.laanc.org.uk](http://www.laanc.org.uk). A response to the set consultation questions is appended to this letter.

### General Comments on the Draft Strategy

1. Aviation Policy Development: The coalition Government's policy on aviation is still embryonic. Although it has confirmed that it will not support the construction of any new runways at the three main London airports, the question of how much extra capacity is to be planned for is subject to a review by the South East Airports Task Force. This is not expected to report until later this year at the earliest. It would appear from the draft FAS that it is the intention of the CAA as regulator to attempt to provide airspace capacity once future airports expansion policy is confirmed. If this is correct LAANC questions the wisdom of this approach and asks whether it would be more helpful for policy makers to be told where future airport development can best be accommodated both in terms of the physical provision of airspace and the minimisation of environmental harm.
2. Meeting Future Airspace Demands: LAANC notes on page 6 of the draft that ensuring that national airspace can meet reasonable demand growth is a key element of the strategy. The FAS assumes that improvements in capacity are needed today and in the future. The draft FAS identifies a potential increase of 80% in the number of flights in UK airspace from 2008 to 2030. Such a capacity would facilitate future growth above that recommended by The Committee on Climate Change (not more than 60% up to 2050). Whilst it is appreciated that the new government has not specifically endorsed the CCC targets, the new government has not abandoned them. LAANC believes that the CAA as aviation regulator should out clearly in the FAS what improvements in the UK airspace capacity can be delivered within the CCC recommendations. It likewise follows that the gap between what is predicted and what can be delivered should be identified.

3. LAANC is concerned that there is no vision for “meeting Environmental Objectives” It is unclear in the draft FAS where responsibility meeting environmental objectives lies. If it is not in the FAS (which seems to have a different vision of "...mitigating the impact of aviation on the environment") then LAANC asks who or which regulatory body will be charged with regulating the aviation industry to ensure that Environmental Objectives are met rather than simply mitigated.
4. The draft strategy offers a number of options as to the factors and methods to be employed in assessing future environmental impacts. LAANC agrees that the full environmental effects of an assumed 3% per annum growth in air traffic between now and 2050 needs to be modelled in advance of the adoption of such as policy. However LAANC has concerns about the adoption of some of the proposed techniques such as Data Envelopment Analysis (DEA) The need to assess the combined effects and trade-offs (emissions, noise, local AQ) whilst acknowledged in the draft FAS are not addressed. LAANC is concerned for example that the draft FAS indicates that "efficiency" is to be used as the guiding principle for managing trade-offs". A number of the proposed assessment techniques outlined are essentially unproven in the UK (so far as environmental assessment is concerned). For example the recent ANASE study data in relation to “willingness to pay” to remove aviation noise failed to deliver, the results being considered unreliable by the peer reviewers. This was despite support from an expert steering group along the way and a six year study timeframe. In addition it is difficult to understand the relevance of some of the proposed secondary assessment metrics identified at Appendix 4 of the draft FAS. For example the use of revenue/kilo would appear to have no relevance at all to the environment.
5. LAANC believes that rather than calling for new guidance from the Government, the CAA should as regulator take a lead and set the issues for ministers that require to be addressed. Thus should also highlight the associated funding requirements for research and development. The possibility of EU funding and cooperation on issues which are relevant across the EU need to be explored. LAANC is particularly concerned at the lack of vision in the consultation document for joint EU collaboration on the vexed issued of community response to aircraft noise. LAANC agrees with FAS key point 10 ( page 113) which states that "there is an opportunity to re-assess existing principles underpinning the treatment of aircraft noise....". Appendix 4 - page 13 refers to Percentage Highly Annoyed (%HA) as a secondary metric to be determined from the Schultz curve. A relationship based on the Schultz curve is given in CAP 725 (although CAP 725 is not mentioned in the draft FAS). LAANC believes that the CAA should take account of EEA Technical report No. 11/2010 "Good practice guide on noise exposure and potential health effects" produced by the European Environment Agency in 2010. That document suggests inter alia that %HA is significantly higher than suggested by the Schultz curve.
6. Overall LAANC is concerned that there is little evidence in the draft FSA that the CAA feels confident (or is likely to be effective) with its expanded environmental role as envisaged by the Pilling review. If the CAA is unable to undertake this role directly it should say so at this stage and suggest how this could be included under agency arrangements either in the UK or within the EU as a whole.
7. Comments on London Specific Proposals: The Draft FAS implies some radical changes to the distribution of aircraft noise over much of London. If trajectory management means that the existing stacks around Heathrow will only be used for emergency use then this is broadly welcomed. It is assumed that at Heathrow this would mean that the arrival process known as TEAM will no longer be used. LAANC would welcome the abolition of TEAM as it would appear that there would then be greater certainty of noise respite for communities under the main arrivals flight paths as a result of runway alternation. This would also enable a clear specification to be drawn up for the protection of quiet areas as defined by the EU Noise Directive and Noise Action Plans.
8. Heathrow Stacks: The proposal to remove move the Heathrow (emergency only) stacks further out and higher up, e.g. beyond M25, continuing the ILS east to M25 is welcomed as it

potentially offers the chance to remove the 'tromboning' effect of Heathrow arrivals over north and south London, allowing London City and some helicopter traffic to be higher. However LAANC asks that Clarity on future navigation requirements should be provided to the project to re-design the London Terminal Control environment between 2011 and 2017, to ensure new standards are met and the re-design takes full advantage of potential improvements in navigational performance. (para 139)"

9. Minimum Noise Routes: LAANC believes that the full FAS consultation should include a review of the potential benefits of dispersion for both departures arrivals within the London airspace.

Yours sincerely

Appendix to:

Consultation Draft - Future Airspace Strategy for the UK 2011 - 2030

Response to Specific Consultation Questions - LAANC

Question	LAANC's response
6.2.1 The Future Airspace Strategy is predicated on modernisation of the UK airspace system, implementing new operational procedures, enabled by technology, to increase the safety and efficiency of Air Traffic Management. In your opinion what are the main drivers and priorities for the modernisation of the National Air Traffic Management system that should be considered?	All modernisation is welcomed but relentless growth will not always be appropriate. Heathrow should not be seeking to grow beyond its existing capacity of 480,000 atms.
6.2.2 From your perspective what are the most significant risks associated with the modernisation of the airspace system to deliver safety, efficiency and environmental benefits?	Some of the benefits conflict and trade-offs will necessarily result in compromises. The risk comes from growth in places where it is inappropriate.
6.2.3 From your perspective what are the most likely benefits associated with the modernisation of the airspace system and what should the relative priorities be?	The removal of the need for holding stacks is welcomed, provided that it does not lead to increases in movements over London.
<b>6.3 Policy and Regulation:</b>	
6.3.1 What are your views on the European and wider International issues and their relative importance as covered in the Future Airspace Strategy?	Integration of FABs should help in the removal of the holding stacks.
<b>6.4 Technology and Operations</b>	
6.4.1 Technology and Operations – Airspace	
6.4.1.1 The Future Airspace Strategy aims to optimise the efficiency of the airspace system that may benefit one airport more than another. What are your views of a strategy that may need to balance such benefits and disbenefits and how do you think the relative merits should be evaluated?	Heathrow will not be in competition with other airports, if it is accepted that there should be no growth. This will then permit any improvements to be based on improving the efficiency without extra growth.

<p>6.4.1.2 What challenges do you envisage arising out of the introduction of greater airspace sharing, in comparison to the current promulgated route structure that will enable equitable access to future airspace that balances the needs of all users?</p>	<p>It would appear that Heathrow is already too congested to benefit from the proposed new technology and will continue to need to be treated as a special case. Heathrow does not have the flexibility to enable any extra capacity.</p>
<p>6.4.1.3 The Future Airspace Strategy proposes significant changes to the UK airspace system. How could the current process for airspace change be strengthened to support a more robust and efficient appraisal, consultation and implementation of the proposals set out in the Strategy?</p>	<p>It is good that NATS has postponed plans for a further consultation over changes to the TCN airspace, as it was not handled well. We welcome the fact that the FAS appraisal is proposed to be more comprehensive, especially in relation to environmental issues.</p>
<p><b>6.4.2 Technology and Operations – Communication, Navigation and Surveillance</b></p>	
<p>6.4.2.1 What factors do you consider particularly important when assessing the proposed increased use of future Communication, Navigation and Surveillance technologies and infrastructure that underpins many of the aspirations in the Future Airspace Strategy? How should the CAA ensure the evolution towards this technological capability is timely and coherent?</p>	<p>Proposed movement increases should away from Heathrow. Any Communication, Navigation and Surveillance technology developments should be aimed at improvements without increasing movements above the existing limit of 480,000.</p>
<p><b>6.5 Environment</b></p>	
<p>6.5.1 How would you assess the current emphasis on environmental matters within the Future Airspace Strategy in relation to safety and capacity?</p>	<p>It is good that the importance of environmental matters within the Future Airspace Strategy is being recognised. Clearly safety is also paramount. As above, increasing capacity is clearly less of a priority, in our view.</p>
<p>6.5.2 How should the Future Airspace Strategy address the trade-off between different types of environmental impacts as set out in the document?</p>	<p>Acceptable trade-offs are clearly a difficult area, on a national basis. As our focus is for Heathrow, it appears that there is less conflict in this issue.</p>
<p><b>6.6 Safety</b></p>	
<p>6.6.1 Do you have any suggestions as to the safety protocols that should apply to the Future Airspace Strategy to achieve</p>	<p>Safety at Heathrow would only be threatened if the capacity were to be increased – so, by maintaining</p>

the principle that, as an absolute minimum, safety levels must be maintained in making changes that benefit other aspects of the system and, where possible, changes should contribute directly to the development of a fundamentally safer system?	the movement cap, any changes should not reduce the existing safety levels.
6.6.2 What are your views on whether or not the Future Airspace Strategy should attempt to set targets against national safety Key Performance Indicators for either all of UK airspace, or specific hotspots as determined by UK operators and air navigation service providers, commensurate with maintaining a 'Just Culture'?	The existing congested airspace around Heathrow sets it apart from the national picture. It therefore seems appropriate to treat it separately, with a policy of no capacity increases.
6.6.3 Do you believe that the CAA has the appropriate policies and tools to regulate new concepts and technologies emerging out of the SES initiative and, in particular, SESAR?	LAANC does not believe that the CAA currently has demonstrated that it has the regulatory vision that is required to fulfil its wider responsibilities as identified by the Pilling Report.
<b>6.7 Capacity and Demand</b>	
6.7.1 How do you view the conceptual thinking on airspace efficiency as articulated in the Future Airspace Strategy draft, as the basis of a way forward?	The concepts appear to provide a way forward nationally, provided exceptions are made for Heathrow.