



## Briefing on Airspace Modernisation

28<sup>th</sup> October 2022

### Summary

Airspace Modernisation involves the redesign of the entirety of the airspace over London and the South East. This means that there will be new flight paths and many communities may experience an increase in noise pollution.

Community groups recognise that airspace modernisation has the potential to deliver some noise benefits on a per-flight basis. But those benefits appear likely to be modest and may be substantially outweighed by the noise and other adverse impacts from additional flights facilitated by modernisation, over which there is currently no effective or policy compliant control.

It appears that the programme is currently systematically biased in favour of achieving the outcomes the industry is seeking (primarily more capacity and lower costs) at the likely expense of achieving the outcomes communities seek (primarily reduced noise and emissions). This means that the legislative and regulatory processes through which modernisation is currently being progressed will not deliver the Government's aircraft noise policies.

### Key Issues

- **Weak Evidence Base**

The Government does not possess reliable evidence base on which to assess the impacts on health and the environment arising from the changes envisaged.

- **Health Impacts of Concentration not understood**

Government has carried out no objective research into the impacts of highly concentrated flight paths, the introduction of which is a key part of the CAA's Airspace Modernisation programme. **What plans does it have to commission such research?**

- **Lack of policy clarity**

The CAA Environmental Panel is undertaking a new survey of noise attitudes, reflecting the need for SoNA (2017) to be updated. The DfT is broadly reviewing noise policy and the report on noise policies from Intergovernmental Panel on the Costs and Benefits of Noise (IGCBN) is expected this year. **Can Government advise on how this programme of work will be incorporated in the ACP option development and appraisal?**

- **Poor Accountability**



There is an absence of accountability in the wider UK aviation sector. In particular, it is felt that the governance structures have limited understanding in addressing quality of life impacts. Nor are many of the organisations involved properly equipped to address the environmental challenges of airspace changes.

## **Community Priorities**

### **Health**

- It remains unclear what specific framework will be used to assess health impacts related to noise and flight path change.
- It is clear to communities that adverse impacts occur at levels below 51dBLeq. Consequently, communities want to see Heathrow commit to publishing analysis of noise impacts below this level and to WHO (2018) guidance levels.

### **Noise**

- Ensure any ACP delivers a dispersal of flight paths and thus ensures a fair distribution of noise pollution.
- Consideration should be given in the Airspace Modernisation programme of the cumulative noise impacts on communities overflown by more than one airport.
- Make aircraft noise a statutory nuisance.

### **Operational Improvements**

- It is also important that any benefits delivered by an ACP are shared equally between local communities and industry.
- Operational improvements should be made now by airports and airlines to help reduce noise impact on local communities – by adhering to best practice guidance on departures and arrivals.

## **Heathrow specific issues**

### **1. Concentration**

The congested airspace and dense population around Heathrow mean that that managed dispersion of noise, based on previous flight path patterns, will not be achievable for Performance Based Navigation (PBN or concentrated) routes. To date neither Heathrow or Government have been able to confirm this understanding is correct.

- Will managed dispersion be possible on non-PBN routes?
- How many routes for Heathrow's ACP will be concentrated through PBN?

### **2. Respite**

Genuine respite appears difficult to achieve given Heathrow's location and the airspace capacity constraints. The concern for many communities is that new flight paths may result



in constant noise throughout the day with no or reduced benefit delivered by runway alternation. Several questions arise that require further clarification:

- What is definition of respite being used?
- Based on what metric?
- Will the objective be to deliver respite that achieves maximum health benefits/minimises newly affected communities or minimise the total number of people?
- What assessment will be undertaken of the impact of combining departure flight paths, at a specific distance, on overflowed communities?
- What impact would this have on respite?

### **What can Government do?**

- Publish evidence of health impacts of concentrated flight paths.
- Introduce new regulations empowering airports to ensure airlines follow best operational practices.
- Introduce a night flight ban of 8 hours.
- Government could impose new statutory duties on NATS and the CAA to reduce, minimise or mitigate significant adverse noise impacts of aviation.
- The CAA should be specifically empowered to approve airspace changes subject to regularly reviewable noise and/or emissions conditions, and to monitor and enforce those conditions.
- CAA's Section 70 duties of the Transport Act 2000 could be amended in order to give a better balance between their responsibilities to the aviation industry and to the general public in the context of its duties on airspace change.
- Update Air Navigation Guidance (2017) to ensure it strikes an acceptable balance between aviation, environmental and community interests.
- Publish a national policy framework on the compatibility of airport expansion proposals with net zero targets. (Local authorities need this to make local planning decisions that do not ride roughshod over national and international priorities on emissions).
- Make budgets available for independent technical and other professional advice to communities where proposed airspace changes will have detrimental health impacts on them.
- There should be an independent peer review of Transport Appraisal Guidance as regards its use in the airspace change process. There is currently little confidence that it adequately reflects the impacts of aviation noise on people and communities.
- Reflect on International experience shows that wherever concentrated flight paths have been introduced over densely populated areas, this has met with overwhelming opposition, and legal challenges.