

4th February 2011

London Stansted Airport Response to CAA's November 2010 Future of Airspace Consultation Document

Overview

Stansted Airport welcomes the Future of Airspace Strategy and the key drivers behind it. We fully support the need for UK airspace to be managed safely, whilst optimising efficiency, and minimising the environmental impacts from aircraft movements. This airport recognises the need for fundamental, and in some cases radical change, in the way UK Airspace is organised and managed. As an industry, we are facing ever increasing challenges in respect of sustainability and the necessity to improve is central to this airport's growth.

Airspace, flight-paths, aircraft noise, emissions and the greater environmental impacts of any responsible growing business are of an ever increasing concern to individuals, communities, government and regulatory bodies alike. We believe this consultation process needs to demonstrate a stepped change in respect of previous consultations and must engage local communities to a far greater extent than ever before.

Stansted has long term growth capacity and prospects that perhaps other London airports do not have at present and with this comes additional responsibility. We would like to review the forecasted growth plan that this FAS is based upon and feel that any changes made to airspace should be flexible enough to incorporate irregular growth patterns, as we have experienced in the past. We feel the re-organisation of airspace should also adequately reflect our full growth potential.

We would also wish to seek greater understanding of how you have determined National and Local benefits and the emphasis / bias given to each area within the FAS.

We proactively work with our local communities to gain a better understanding of their concerns in relation to aircraft noise and emissions and would recommend that changes to existing NPR's are avoided. We continually work with airlines to improve track keeping and have regularly trialled RNAV procedures within our existing SID's. Our evidence suggests that the overwhelming majority of aircraft that use Stansted Airport can easily fly the existing SID's with their modern, GPS based navigation technology. A greater use of this investment in technology by the Aviation Industry, whether it be navigational or aircraft performance, should be at the forefront of any consideration of the FAS.

Existing, well established Noise Abatement Procedures should be enhanced. We find it disappointing after so many years of 'possibility', that there is still no CDA to our North-Easterly runway, 04. This is one of a number of significant issues for our local community, as well as other regional issues such as Dedham Vale, South Cambridgeshire and areas affected by holding stacks.

General Comments

We see this FAS as a key driver to invoke the technologies this industry has invested heavily in over many years and to fully utilise these benefits by providing a safe, modern and efficient airspace. A particular aspect for Stansted Airport would be to adopt High Performance SID's, currently under trail, which de-conflict air traffic from other airports. Current airspace makes our existing SID's inefficient, resulting in extended track miles to de-conflict with other air traffic, therefore increasing fuel burn, noise, emissions and the exposure of greater proportions of communities to these adverse effects of air transport. The integration of a CDA to our runway 04 is fundamental to this airports view of efficient, environmentally aware airspace.

Policy and Regulation

This airport believes that a review of all airspace across Europe can result in a massive improvement in efficiencies. The routings to the north for domestic flights in the UK from the London area are incurring abnormal track miles, which could be considerably decreased by the use of some military designated airspace. A 4 dimensional airspace design is fundamental in achieving this. A collective, collaborative approach to airspace efficiency should be welcomed by all stakeholders within European airspace.

One of the challenges faced in a radical re-design of airspace is to maintain safe operations whilst accommodating more traffic movements, without the need for increased track miles by way of extended vectoring. This could be achieved in some way by the sharing of military airspace.

Technology and Operations

The balance in optimising airspace efficiency should consider the existing capacity of any airport and its future growth potential. Stansted is the 3rd largest UK airport and currently has the capacity to increase its passenger numbers by 100% to 35mppa. This future increase in movements to accommodate this growth should be factored into any decisions about airspace design. We don't feel that current airspace is designed in an efficient way to reflect this growth, and welcome the potential that the FAS has to offer in this respect.

We strongly support the concept of developing a 4D approach to airspace management and enabling better 'point to point' routing, with the benefits felt by all.

Stansted has conducted many RNAV trials over recent years to improve track keeping within our existing SID's. It works very well indeed and the evidence we can produce clearly shows how accurately modern aircraft can fly. Stansted has always felt frustrated at the lack of progress in introducing RNAV overlays to existing SID's, for aircraft that are technologically equipped, despite presenting our evidence to the appropriate regulatory organisations. Our current SID's are inefficient for the modern, technologically advanced aircraft we have operating. Not fully utilising this technology within a High Performance RNAV SID presents a considerable dis-benefit for the airport and surrounding communities alike.

Stansted Airport would welcome, and actively participate, in any future trials that fully utilise the capabilities of our modern aircraft and see performance based navigation as a clear indication of some of the technologies and principles that should be invoked.

Environment

Fundamentally, we don't believe that the environmental aspect of the FAS features highly enough. All environmental aspects are a key driver in the sustainability of the aviation industry. The environmental aspects of aviation are felt far beyond the aviation industry itself and as such should feature predominantly in the FAS and given equal consideration when assessing all other aspects of the FAS.

Given the focus that our communities, regulators and planning authorities demand, we believe we will face increasing operational restrictions and capacity limits if the environmental impact of airspace management is not properly addressed in this consultation

It is the responsibility of the aviation industry as a whole to address the environmental impacts it creates. This FAS could facilitate a forum, between NATS, Airports, Airlines and regulators and set a clear environmental policy, aims and objectives.

Safety

Without question, the continuing safe operation of aircraft is a primary objective within this strategy. To enhance safety, the technology of modern aircraft should be fully utilised. Extending controlled airspace around busy airports should be considered to avoid potential conflicts with 'zone infringed' air traffic without the immediate impacts upon an airport when this occurs.

Aircraft with less performance in respect of airframe, engine or navigation, could be restricted to operate at times when airspace is less utilised.

The FAS should set demanding objectives for safety performance along with similar objectives and goals for environmental performance.

Capacity and Demand

Stansted Airport broadly agrees with the objectives set out in the FAS and it is clearly projecting the right messages from the aviation industry. It would be prudent to set objectives in terms of milestones and timescales against the progress made in any final strategy.



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