

# **Response to Department for Transport Consultation on the Future of UK Aviation Annex A – Legalisation to enforce the development of airspace change proposals**

Stop Stansted Expansion ('SSE') was established in 2002 in response to Government proposals for major expansion at Stansted Airport. We have some 7,500 members and registered online supporters including 150 parish and town councils and local residents' groups and national and local environmental organisations. Our objective is to contain the development of Stansted Airport within tight limits that are truly sustainable and, in this way, to protect the quality of life of residents over wide areas of Cambridgeshire, Essex, Hertfordshire and Suffolk, to preserve our heritage and to protect the natural environment.

Stop Stansted Expansion

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[www.stopstanstedexpansion.com](http://www.stopstanstedexpansion.com)



## 1. Introduction

This document is the response from Stop Stansted Expansion ('SSE') to the Department for Transport's ('DfT') consultation on the Future of UK Aviation Annex A: *Legalisation to enforce the development of airspace change proposals*. SSE welcomes initiatives to improve the operation of UK airspace which increase the efficiency for users and at the same time reduce the environmental harms and adverse health impacts for people living around airports and under flight paths.

## 2. Preliminary comments

At the outset, SSE is concerned that the essence of the overall Green Paper "The Future of UK Aviation" appears to clearly subordinate the reduction of adverse environmental issues, particularly noise harms, to the growth in the number of flights. The Civil Aviation Authority ('CAA')'s airspace change process, through which modernisation will primarily be delivered, is thought likely to prioritise industry interests over community interests whenever the two are in conflict.

Furthermore, enforcement of the development of airspace change proposals must not be undertaken without ensuring that communities will benefit from it. SSE's general support of the legalisation proposals should be seen in this context which must be addressed satisfactorily to ensure an equitable balance between aviation industry benefits and the reduction of community adverse noise impacts.

SSE has maintained for many years that the absence of an overall UK airspace masterplan has been a serious omission in the development of the future airspace strategy. It has resulted in piecemeal airspace changes and where interdependences exist, as is clearly the case in the south of the UK and the London Terminal Manoeuvring Area, local communities are not able to properly assess the likely impacts where they interact, or in the context of future changes within an overall masterplan. This was also the unsatisfactory case in the NATS LAMP1A Stansted departure route change proposal in 2014 where no information was provided for any subsequent likely LAMP2 airspace changes. The proposal to require NATS to develop a coordinated implementation plan and timeline for airspace changes (airspace change masterplan) in the South of the UK is long overdue.

SSE believes that maximum use should be made of the CAA portal for airspace changes to assist with communication and engagement with communities.

### **Response to the Consultation Questions**

#### **Q1. Should the government legislate for powers to direct individual ACPs identified as necessary in a masterplan to be taken forward?**

A1. Yes. It is particularly important for local communities for the masterplan to identify and quantify noise reduction and improvements to air quality with deliverable timescales. This will become even more important as Performance Based Navigation improvements to flight paths are progressively implemented.

**Q2. What are your views on the above two proposals?**

A2. Both are supported.

**Q3. Do you agree that option a) should be the lead option?**

A3. Yes.

**Q4. What are your views on the scope for the use of the powers?**

A4. The proposed scope of these powers is supported.

**Q5. What are your views on the use of the triggers for using the legislative powers?**

A5. The establishment of a new Airspace Modernisation Strategy Delivery Monitoring and Oversight (DMO) team within the CAA is supported. The proposed use of the triggers is supported.

**Q6. What are your views on the proposed sanctions and penalties regime?**

A6. The proposed penalty regime is supported.

**Q7. What are your views on the grounds for appeals?**

A7. The proposed grounds for appeal are supported.

**Q8. What are your views on the best approach to funding an airspace change where a small airport may need financial support to do so?**

A8. Funding should be recovered from airspace users.