



Incorporating Stop Stansted Expansion

Stansted Airport Watch welcomes the opportunity to respond to the Civil Aviation Authority's **Draft Airspace Modernisation Strategy 2022–2040 consultation**

Question A. Are you responding in an official capacity on behalf of an organisation?

Yes. Stansted Airport Watch

Question B. What is your name?

Sarah Cousins

Question C. What is your email address?

Question D. Answering as?

Local organisation e.g. community action group

Question E. Where do you live or where is your organisation based?

East of England

Question F. Is there anything else that you would like us to know about you in connection with your response?

Stansted Airport Watch (SAW) was established in 2002 (originally as Stop Stansted Expansion) 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.

Question G. Do you consent to your response being published?

Yes, with personal identifying information (organisation, name, respondent category, location, additional information – please note your email address will NOT be published if you choose this option)

Question 1. Do you agree with our overall approach in the refreshed Airspace Modernisation Strategy?

Major modifications needed

The overall approach needs to be modified to ensure that benefits are equitably shared between the aviation industry and local populations living around airports and under flight paths by reducing noise harms and other adverse environmental impacts. In that the refreshed Airspace Modernisation Strategy Objectives are given in a CAA shared document with DfT, this consultation is inextricably linked with government noise policy. In our view there is a clear contradiction between government policy and the contents of the refreshed Airspace Modernisation Strategy and the ACOG masterplan. Government policy says that, as a general principle, “*the industry must continue to reduce and mitigate noise as airport capacity grows*. And it is clear that modernisation will increase airport capacity. At Stansted airport with a capacity cap, the planning system failed to deliver this policy principle when the airport capacity was allowed to grow. There is no mention of this key element of government policy either in the CAA’s draft strategy or the associated Airspace Change Organising Group (ACOG) masterplan. Neither of these documents provide any evidence that the policy will be delivered in the context of airspace modernisation. And neither body has explained what steps they will take to ensure it is delivered.

This policy vacuum must be rectified to ensure that the Airspace Modernisation Strategy is fit for purpose.

Question 2. Have we captured the drivers for change adequately in Part 1, Chapter 2?

No

The four drivers for change fail to include the need to reduce and mitigate noise harms and other adverse environmental impacts. This must be rectified.

Question 3. Have we identified the right stakeholder groups in Part 1, Chapter 2?

Yes

Question 4. What are your views on the nine delivery ‘elements’?

Minor modifications needed

In our view the successful and timely introduction of Performance Based Navigation will be an essential component of the Airspace Modernisation Strategy. This in turn requires further research into the impacts of PBN on communities overflown to ensure that the optimum outcome is achieved between concentration and dispersion of flights including alternate and respite routes and tailored to each airport.

Question 5. Part 3 of the AMS will cover who is responsible for deploying the delivery ‘elements’ and related activities, and how. At this early stage, what are your views on any requirements we should have for those tasked with the deployment of those elements and activities?

No comment

Question 6. How effective has the AMS governance structure been, for example in terms of overseeing delivery of the strategy, stakeholder engagement or transparency?

Don’t know

The effectiveness of the UK Airspace Strategy Board is not known, but it is believed to have rarely met. From the perspective of a community group stakeholder, the technical and operational details of airspace modernisation are complex. Local communities around airports and under flight paths lack this necessary independent resource (both expertise and funding) and are consequently handicapped in engaging in the process.

This should be resolved.

Question 7. The refreshed strategy is broader in scope. What changes to governance are needed to deliver the broader strategy, including future approaches to funding?

See our answers above

Stansted Airport Watch
4 April 2022