

# Draft Airspace Modernisation Strategy 2022–2040 consultation questions

## About you

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

*(Required)*

Please select only one item

- Yes
- No

If yes, please give us the name of the organisation

The Royal Parks

### B What is your name?

*Julia Frayne*

### C What is your email address?

If you enter your email address then you will automatically receive an acknowledgement email when you submit your response.

Email

### D Are you answering as:

*(Required)*

Please select only one item

- Airline passenger
- Resident affected by aviation
- General Aviation (GA), including representative organisations
- Remotely Piloted Aerial System
- Commercial aviation/aerospace industry including trade associations
- Consultancy
- Central or local government body including military
- Elected political representative e.g. councillor or MP
- National organisation (excluding GA organisations and industry trade associations), e.g. NGO
- Local organisation e.g. community action group, airport consultative committee or forum

if you fall in more than one category, choose the one that is most relevant to you answering about airspace issues

## **E Where do you live or where is your organisation based?**

*(Required)*

*Please select only one item*

- East of England
- East Midlands
- West Midlands
- North East
- North West
- Northern Ireland
- Scotland
- South East
- South West
- Wales
- Yorkshire and the Humber

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

The Royal Parks (Company number 10016100 and Charity number 1172042) is a guardian Charity (successor body to a Government Agency) with responsibility for managing over 5000 acres of historic parkland and open space across London. These include the eight Royal Parks: Hyde, The Green, St James's, The Regent's and Primrose Hill, Greenwich, Richmond and Bushy Parks, and Kensington Gardens. We also manage other important public spaces including Brompton Cemetery and the Longford River.

The Royal Parks contain historic listed landscapes, include rare habitats, are sanctuaries for wildlife and enjoy important protective designations.

This is especially true for Richmond and Bushy Parks. Richmond Park is a National Nature Reserve (NNR), London's largest Site of Special Scientific Interest (SSSI) and a European Special Area of Conservation (SAC). Bushy Park is a Site of Special Scientific Interest (SSSI).

Both Richmond and Bushy Parks and the Longford River are significantly impacted by proximity to Heathrow Airport. However, the other Royal parks in central London and at Greenwich could also be impacted by changes of any kind to flight paths and/or an increase in number of flights.

These impacts include an increase in noise and air pollution, and the associated implications for the health and wellbeing of park users and the Parks' biodiversity.

Richmond Park is subject to specific statutory requirements for the assessment of plans and projects which may impact the designated interest features of its SAC designation.

The parks and public spaces for which The Royal Parks is responsible are historic public amenity spaces, valued for their beauty and tranquillity by approximately 77 million annual visitors.

We are mindful of an overarching responsibility to ensure the parks are protected for future generations. The pandemic has served to highlight the importance of parks and public open spaces – and how vital it is to appreciate and protect them. Therefore any potentially adverse impact on the parks is highly important to local communities and likely to meet with public resistance.

The Airspace Modernisation Strategy (AMS) has potential for a direct and significant impact on the fabric and ambience of the public open spaces for which The Royal Parks is responsible.

We are aware that the Friends of Richmond Park, which is a stakeholder organisation but entirely independent of The Royal Parks, has also submitted a response to this consultation.

### **G Do you consent to your response being published?**

*(Required)*

*Please select only one item*

- 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)
- yes, anonymised
- no

## Views on the overall strategy

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

Please select only one item

- about right
- minor modifications needed
- major modifications needed
- don't know

If you wish, please explain your answer using the box below. You may, for example, want to consider whether our strategic vision for airspace modernisation out to 2040 is fit for purpose, and give us views on the four strategic objectives we have identified (safety, integration, simplification and sustainability).

Please note that we are not seeking views on matters of government policy, over which we have no direct control. For example, the CAA must follow government policy and guidance on environmental objectives setting out how aviation-related environmental impacts should be considered.

Nor are we seeking views on the CAP 1616 airspace change process, or on specific airspace changes or change proposals.

We will not take into account elements of responses to this consultation that we consider to be out of scope.

The Royal Parks notes that the Airspace Modernisation Strategy (AMS) is necessarily based on developing technology and incorporating and controlling technological developments, including new types of aerial craft (such as drones) over the long term. We therefore welcome extension of the focus of the AMS from 2024 to 2040.

We welcome the inclusion of Sustainability as one of the four overarching principles to be applied through airspace modernisation.

We note that inclusion of the Sustainability principle expands to set out that "*Airspace modernisation will deliver the Government's key environmental objectives with respect to air navigation as set out in the Government's Air Navigation Guidance and, in doing so, will take account of the interests of all stakeholders affected by the use of airspace*".

TRP considers that in order to meet the commitment set out above the list of stakeholders directly consulted at delivery stage must go beyond the industry to include local government, environmental groups, community groups and, importantly, managers of land and public open space including The Royal Parks.

TRP also considers that one of the priorities of the strategy should be to ensure that the nature of the technological changes and their potential impacts and implications are clearly understood by all those potentially affected and not just by industry insiders with specialist knowledge.

Consultation documents and consultation exercises should therefore be presented in a clearer and more readily accessible format for all those outside the aviation industry including community groups and members of the general public.

## **2 Have we captured the drivers for change adequately in Part 1, Chapter 2?**

*Please select only one item*

- yes
- no
- don't know

If no, please describe what is missing or needs amendment and how this might require a change to the draft strategy.

The Royal Parks is concerned first to ensure that development within the aviation industry does not serve to increase the detrimental environmental/ambient impact on the land under TRP's management. A particularly important concern to TRP in this regard is in terms of the level and incidence of ambient noise.

We would also like to see emphasis placed on the potential for positive environmental benefit through technological advances, in the form of better management of noise and achieving government targets on Net Zero emissions.

We consider that recognising and seeking to meet the public demand for such positive changes should also be one of the drivers.

## **3 Have we identified the right stakeholder groups in Part 1, Chapter 2?**

*Please select only one item*

- yes
- no
- don't know

If no, please describe the missing group

The stakeholder groups identified are primarily industry focused. There are therefore missing sectors who are directly and significantly affected by flight paths.

These include The Royal Parks and other managers of public open space and public infrastructure. The also include volunteer groups with a special interest and expertise in such public spaces and infrastructure.

## Views on the delivery 'elements'

### 4 What are your views on the nine delivery 'elements'?

The nine delivery 'elements' are in Tables 4.1, 4.2 and 4.3 in Chapter 4 of Part 1 of the strategy, with more detail in Part 2 and the linked database. In Chapter 5, we also describe five illustrative use cases relating to different aspects of modernised airspace in the 2030s from the perspective of different stakeholders.

The delivery elements are:

*Please select only one item*

- about right
- minor modifications needed
- major modifications needed
- don't know

If you think modifications are needed, or that something is missing, please explain this below.

TRP considers modifications are needed to ensure that Environmental Sustainability is afforded the same weight as the other three strategic principles (Safety, Integration and Simplification) in feeding into the nine delivery elements.

At present the focus is towards industry benefit and environmental mitigation rather than positive environmental benefit.

There appears to be an acceptance that the environment would be the loser in potential trade-offs between industry benefit and sustainability benefit.

It would be beneficial if the different elements of environmental sustainability – emissions, air quality, detrimental impact of ambient aircraft noise - were broken down and clarified. This would put the magnitude of the Sustainability at centre stage and serve to direct attention to tackling each element of it accordingly.

### **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?**

Sustainability should be a specific responsibility within and throughout the AMS structure, broken down into its component elements to clarify the scale of the task.

Emphasis should be placed on reducing the adverse impact of ambient aircraft noise on public open space, minimising harmful emissions and ensuring that the UK ultimately complies with its international obligations on air quality.

## Views on AMS governance

*More information on governance and funding of a broader, refreshed strategy (click here)*

The 2018 Airspace Modernisation Strategy, including its delivery and governance structures, was mostly focused on commercial air transport, controlled airspace and larger air navigation service operations. Our refreshed strategy proposes adding new areas of focus, in particular around integration, for example:

- seamless integration of beyond visual line of sight drone operations
  - a Lower Airspace Service to better support both self-management of piloted VFR (Visual Flight Rules) aircraft and drone operators in class G airspace
  - flight progress information sharing to facilitate increased VFR access to class D airspace
  - an improved class G structure
- and so on.

However, not all of these new areas of focus sit readily with the current strategy's delivery and governance, and by inference funding, structures.

Currently, aside from the UK Flight Information Service provided to meet ICAO obligations, and specific arrangements for the North Sea, aircraft outside controlled airspace are either:

- not receiving a service (relying on a traditional 'see and avoid' means of deconfliction), or
- benefiting from navigation aids and/or air traffic services that are already established for commercial or military users.

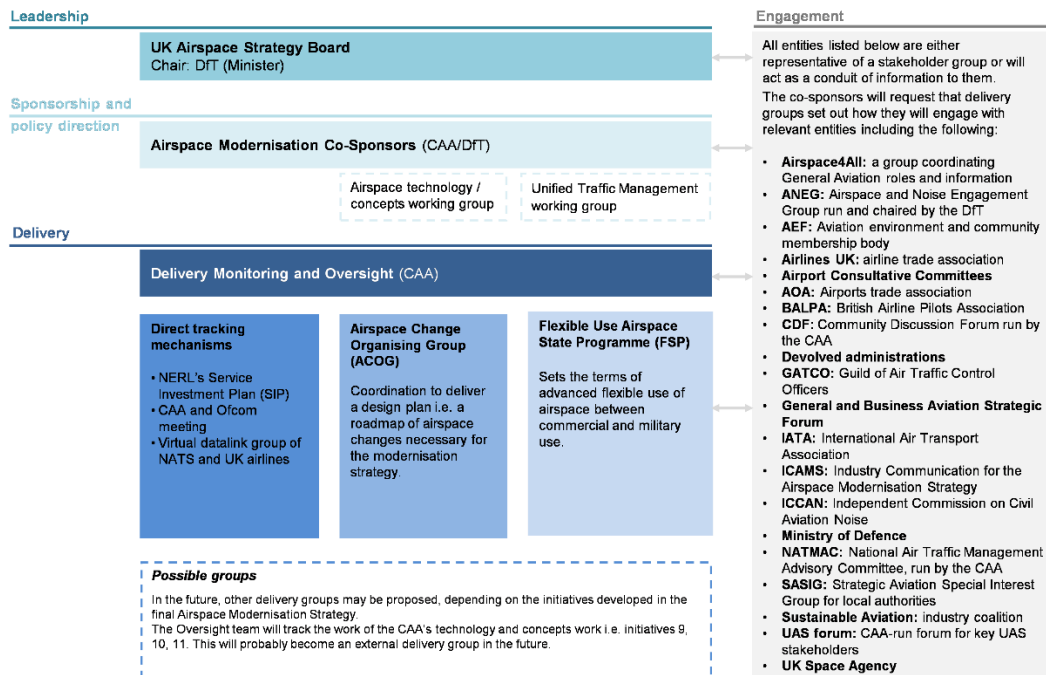
The CAA recognises that there has to be a fair and equitable funding model for users of a modernised airspace.

**We would expect to consult on this separately in due course, subject to advice from the Government.** With this in mind you may want to tell us how we should alter the Airspace Modernisation Structure governance structure in the meantime, including any thoughts on future approaches to funding. We have asked two questions below.

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

Below is the governance structure we last published in [CAP 1862](#) in December 2019, which itself updated the original 2018 CAA/Department for Transport governance annex [CAP 1711b](#). Further changes have occurred in the last two years.

### Governance structure 2019



The existing governance structure has been:

Please select only one item

- effective
- generally effective but lacking in some areas
- wholly or mostly ineffective
- don't know

Please explain the reasons for your answer. We are particularly interested to know:

- whether it is clear to you who has been responsible for what
- whether we had the right delivery groups
- whether they have been properly funded.

The AMS governance structure necessarily comprises the many and various industry bodies. However, it needs to find a better balance/interface with managers of land and public open spaces, with local planning authorities and with local community groups.



One of the priorities of the strategy, managed through the governance structure, should be to ensure that it is clearly understood by all its potentially affected communities including those outside the aviation industry.

We consider that consultation on all aspects of Airspace Modernisation should be publicised more actively towards, and made more readily understandable and accessible to, those outside the industry.

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

We are particularly interested to know:

- whether the structure needs to change
- whether the co-sponsors need to do anything differently
- whether any new stakeholders not identified in the existing governance structure need to be added.

For example:

- to help with delivery of Part 2 of the strategy we might consider introducing a Deployment Steering Group made up of industry representatives at operations director level
- to help deliver airspace integration we might consider introducing an Integration Steering Group overseeing separate working groups on beyond visual line of sight operations for drones, service provision, airspace structures etc.

TRP notes that the DfT and the CAA are co-sponsors of the AMS, working together to deliver the strategy and objectives for modernisation of UK airspace.

TRP welcomes this partnership between government and industry.

We note that there will be further consultation on this aspect of the AMS in due course. We would reiterate therefore that such consultation should not simply capture those within the industry but that there should be active and accessible engagement with all affected stakeholders. These should include managers of public open space such as The Royal Parks and the communities we serve.