

**From:** East Twickenham Heathrow Campaign <[REDACTED]>  
**Sent:** Monday, December 16, 2024 5:18 PM  
**To:** Airspace Modernisation <airspace.modernisation@caa.co.uk>  
**Cc:** [REDACTED]  
**Subject:** [External] Supplement to CAP3029 response - Governance Principles

East Twickenham Heathrow Campaign is an umbrella community group, set up by local residents' associations, addressing the interests of the 5000 or so residents of East Twickenham affected by air traffic into and out of Heathrow.

This is a supplement to our detailed response to the CAP3029 – 'Airspace modernisation: consultation on a UK Airspace Design Service'. It relates primarily to:

- Q16 What are your views on our proposals for UKADS1 governance?
- Q17 Would these proposals give sufficient reassurance that potential conflicts of interest arising from NERL providing airspace design services through UKADS1 are mitigated?
- Q20 Do you have any views on our proposed concept for UKADS2?

## Stakeholders

- **Communities affected by aircraft noise and pollution are key stakeholders in the airspace above them**, especially the lower altitudes. Everyone in those communities is, to varying degrees, adversely affected multiple times a day by the industry's activities, regardless of whether/to what extent they use its services.
- Based on passenger numbers, **civilian aviation is primarily part of the leisure/tourism industry**.
- Airlines and airports are clearly stakeholders in airspace management, with **non-UK shareholders the main financial beneficiaries of their activities**, Heathrow being the prime example.
- The UK clearly needs good quality transport infrastructure, and many of us fly through UK airspace from time to time. Many of us are also mindful of the threat of **climate change, the significant and growing contribution aviation makes to it**, the Government's drive towards net zero, and our responsibility to use it judiciously.

## Airspace change

- Recognition of local communities as stakeholders becomes even more important when change is considered. **Everyone has chosen to live where they do today in the knowledge of current levels of the aircraft noise and pollution.**
- When change is made, **gains and losses are rarely symmetrical**: someone who experiences a reduction from, say, 100 to 70 overflights a day may not perceive much difference. Yet someone who experiences an increase from zero to 30 overflights will be outraged. The innocuous-sounding "airspace modernisation" may result in many people suffering a major deterioration in their quality of life. Their health and well-being are at least as important as the needs of the airport, airlines or tourist industry.
- The data in the Regulatory Impact Assessment make clear that **by far the most significant of the groups affected are the 700,000 people affected by Heathrow.**

## Governance

- The governance arrangements proposed are **“by the industry, for the industry”**:
- There is **no empowered voice for local communities** or even requirement for them to be informed, engaged, or understood, let alone have their needs taken into account.
- There is **no empowered independent environmental and health oversight**, despite growing evidence about the health impacts of aviation noise and pollution.
- The desire to press ahead without primary legislation means UKADS1 is proposed to be part of NERL, a deeply-embedded industry player, with **no requirement to meet the standards of transparency, probity or accountability** that would apply to a public sector body.

There is a major failure of democratic accountability in the making here. It will not go away until it is properly addressed.

Regards,

## East Twickenham Heathrow Campaign

**Johanna Eschbach, Jeremy Rodell** - Richmond Bridge Residents Association

**Colin Hines, Philip Jeffery** - Twickenham Park Residents Association

**Jennifer Saunders** - The Barons Residents Association

**Ronnie Leon** - resident of Richmond Bridge Estate

*All emails to [REDACTED] are forwarded to the above*