



HOUSE OF COMMONS

LONDON SW1A 0AA

TO: The Rt Hon Heidi Alexander
Secretary of State for Transport
Department for Transport (DfT)
Great Minster Houses of Parliament
33 Horseferry Road, London
SW1P 4DR

Sir Stephen Hillier
Chair, UK Civil Aviation Authority (CAA)
Aviation House, Beehive Ringroad
Crawley, West Sussex
RH6 0YR

CC: Ruth Cadbury MP
Chair, Transport Select Committee

17 December 2024

Dear Heidi and Stephen,

Re: UKADS – ensuring proper governance and parliamentary oversight

We are writing as MPs whose residents are greatly affected by aircraft noise and pollution in our areas – and therefore have a keen interest in proposed changes to UK airspace design.

Specifically, we are writing to express concerns around the governance, composition and oversight of the new body, the UK Airspace Design Service (UKADS), that is being proposed by the Department for Transport (DfT) and the UK Civil Aviation Authority (CAA).

We understand that UKADS would be responsible for taking ownership of airports' individual Airspace Change Proposals (ACPs) and consolidating them under one umbrella. These proposals would be delivered in two phases, with UKADS1 taking ownership of airspace design changes in the 'London cluster' of airports, and UKADS2 extending to all other UK airspace regions.

We appreciate that the goal of UKADS is to help deliver the Government's broader Airspace Modernisation plans "at scale and at pace", as set out in the CAA's Airspace Modernisation Strategy published in January 2023.

It is important to state at the outset that we are not opposed to changes per se, and we agree that a more holistic, coordinated approach to Airspace Modernisation could be beneficial. Our reservations lie in the proposed governance, responsibilities and scope of the new UKADS body, and how to ensure proper transparency, accountability and parliamentary oversight, so that we protect our communities and the environment. Indeed, we note that Governance is one of the specific subject areas (Question 16) of the consultation that is currently underway on UKADS1.

On that point, we are concerned that the new structure of UKADS1 involves greater centralised control as a result of incorporating significant parts of NATS, which is responsible for air traffic control at many of the UK's biggest airports and manages all UK upper airspace. We are concerned that centralising control could lead to *less* oversight and an industry stranglehold over decision making. This in turn could result in severe adverse outcomes in

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living conditions for a significant number of people living in London and the South East who could be impacted by highly concentrated flight paths.

We are also concerned that NATS, whilst having airspace design expertise, has not had an environmental remit in lower airspace. NATS also lacks other relevant experience, expertise and local knowledge which means it is not qualified to address the widespread implications for health and quality of life for millions of people in London and the South East, given that noise and air quality could become significantly worse for some overflowed communities.

In addition, given their declared objectives to promote aviation growth, neither NATS nor the CAA are in a position to make balanced and impartial decisions in areas where commercial and environmental objectives conflict.

It does not seem appropriate that whilst the second phase of these proposals, UKADS2, would be subject to primary legislation and parliamentary scrutiny, UKADS1 would not. In fact, there is a strong case that UKADS1 is in fact the most important, complex and environmentally sensitive area of the UK for Airspace Modernisation. This is down to its multiple large airports, densely populated areas and – based on international experience – the great numbers of people who will potentially be adversely impacted. On this basis, the creation of UKADS1 should be subject to *greater* scrutiny, not less.

In response to the current consultation, therefore, we are calling for greater public and political input in relation to UKADS1, with an accountability structure and operating model that truly reflects a balanced and evidence-based approach. In our view, this would include:

1. A full and independent Environmental Impact Assessment on Airspace Modernisation that would assess health and environmental impacts.
2. An Independent Environmental and Health Advisory Board that would be a statutory consultee in relation to the ACPs for all component airports under UKADS.
3. Proper parliamentary oversight from the Transport Select Committee, the Environmental Audit Committee and the Climate Change Committee.
4. Ensuring that community groups are represented on any UKADS advisory board.

The CAA and DfT have said they want to ensure that the UKADS consultation is “transparent, fair, impartial and effective”. It is crucially important, therefore, that proper oversight and environmental considerations are not sacrificed in favour of short-term expediency.

We would appreciate the opportunity to discuss this with you further, and look forward to hearing from you.

Yours sincerely,

Munira Wilson MP
Member of Parliament for Twickenham

Sarah Olney MP
Member of Parliament for Richmond Park