

From: Bridget Bell
Sent: Friday, December 13, 2024 4:35 PM
To: Airspace Modernisation <airspace.modernisation@caa.co.uk>
Subject: [External] UKADS consultation response

Please note that as a member of the Aviation Environment Federation (AEF) I support their response in outline below.

Additionally, Teddington Action Group (<http://www.teddingtonactiongroup.com/>) makes important points, as attached, that I also support.

I would be grateful for your acknowledgement that my comments will be in the UKADS Consultation.

AEF: Overview of the role of UK ADS

UK ADS should have a responsibility to ensure that community and environmental interests are considered fully in every aspect of its remit and activities, in addition to the requirements of CAP1616. This would improve transparency and avoid any risk that community feedback is diluted or misrepresented as a result of airports being the primary channel for consultation. To date, our experience of airport led engagement has often failed to meet the tests set out in CAP 1616. Engagement should therefore be a joint airport/UKADS responsibility.

Specifically, there should be additional engagement, treating communities as a tier 1 consultee, on the design principles and shortlisted options for any ACPs to be taken over and/or merged by UKADS particularly in circumstances where:

- UKADS proposes to make changes to design principles previously agreed
- UKADS proposes to introduce new system-wide design principles and options
- an option assessment is required.

The governance structure of the UK ADS should provide a robust and enduring mechanism through which community and environmental stakeholders can make input and hold the organisation to account.

We are surprised and disappointed that DfT and the CAA have not specifically identified a need for community and environmental stakeholders to be represented at all levels in the governance structure including on the UKADS Advisory Board. Given the claimed that sustainability runs through the programme, it is not clear who provides oversight of this commitment on the Advisory Board. Consumer representatives and industry both have wider interests.

Failure to recognise community and environmental stakeholder as "key" in these and other overarching respects, and to exclude them from the Advisory Board, would be wholly unacceptable. We recommend the addition of local government and environmental interests such as the Local Government association and AEF.

The role of the UK ADS would be strengthened if airspace modernisation law and guidance better defined the balance to be struck between achieving industry aspirations (for increased capacity and reduced costs), meeting community needs (regarding noise reductions), and reducing emissions (to reach net zero and reduce air pollution) in the decision-making framework; provided a clear aircraft noise policy; introduced a monitoring and enforcement process to ensure that environmental benefits are delivered and maintained, and; compensated people for the financial, health and quality of life impacts of airspace changes.

Regarding the creation of a single London cluster ACP, there is significant concern that a focus on "the most efficient and resilient airspace network possible, while giving due consideration to local circumstances and environmental impacts" implies that community and environmental considerations would be treated as second order issues.

It cannot be right that the stakeholders least able to meet the costs of responding to changes and most likely to be adversely affected are the only ones whose costs would not be met from the charge. Funds from the proposed UK Airspace Design Charge should also be used to provide authoritative independent advice to communities on the impacts of proposed changes.

Bridget Bell