

## **Response to the CAA consultation on a UK Airspace Design Service**

**17 December 2024**

The Coalition believe that the introduction of a new entity at this stage risks exacerbating the distance between decision makers and local communities. We expect this will create delays to public consultation on flight path options, adding to the uncertainty and frustration that many of our members feel that airspace modernisation is something being imposed upon them. The lack of clear information about plans for new flight paths continues to undermine the credibility of the industry.

We are concerned that the production of a single Airspace Change Proposal (ACP) for the entirety of London will add further complexity and confusion to the process. Our members simply want to understand as soon as possible the proposed changes and what this will mean in terms of number of aircraft overhead on a daily basis. We would like to a strong community and environmental duty placed on UKADS to help ensure due consideration to these issues is given.

### **Environmental and Health Impacts**

Our members remain concerned about the environmental and health impacts of airspace change proposals. We would welcome greater clarity on how UKADS will address these impacts before approval for its creation is granted. It is also unclear how UKSADS will balance the competing issues at play in an ACP and what priority will be afforded to air pollution or noise compared to capacity enhancements. Many members would also like to an option that maintains the flight paths in a broadly the same configurations as the present day.

Many environmental noise studies are indicating that many people suffering from, or who have suffered from, mental illness are increasingly annoyed, or very annoyed by aviation noise. The Coalition would like to see UKADS incorporate an objective health impact assessment framework into in its remit and governance structure.

### **Community Engagement**

There currently appears to be little consideration of a mechanism for direct community engagement with UKADS. We would like to see community engagement made a join airport and UKADS responsibility to ensure direct community engagement with UKADS is possible without relying on a third party.

Many members dedicate large amounts to time to engagement with Heathrow on airspace change and would welcome greater clarity about how the creation of UKADS will interact with the development of Heathrow's proposals at Stage 3 of CAP1616.

## **Governance**

The advisory board that will form part of governance structure of UKADS is lacking either community or environmental representation. It is vital that at least two representatives of overflowed communities should be involved. We support the AEF recommendation that the creation of a balanced Advisory Board should include representatives of communities, other environmental experts, and local government.

## **Funding**

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.