

Airspace Regulation (Ref CAP1616 Review Consultation)

CAA Safety and Airspace Regulation Group

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CAP3157 – consultation on changes to the airspace change process CAP1616

<https://www.caa.co.uk/our-work/publications/documents/content/cap3157/>

HSPG responses to questions:

A1 About you

Q1 – 4

This response is made by the Heathrow Strategic Planning Group (HSPG), a constituted grouping of ‘willing’ local authorities¹ committed to delivering sustainable growth across the functional economic area surrounding Heathrow Airport.

The Group was formed in late 2015. It is independent of, but constructively engages with, Heathrow Airport Ltd (HAL). The Group collaborates on interventions that could improve the area around the airport and acts as a conduit between the members and Heathrow Airport Limited, regional and national Government, and other key stakeholders.

This response has been prepared by the partnership’s Secretariat with engagement with our technical Local Authority officer working groups.

<https://www.heathrowstrategicplanninggroup.com/>

A2 - Proposal 1 A proposal to reduce the number of Gateway approvals required from CAA at existing Stages 1 and 2.

HSPG AGREE support Option 3 (preferred option)

¹ London Borough of Ealing, London Borough of Hounslow, Runnymede Borough Council, Slough Borough Council, Spelthorne Borough Council, Surrey County Council, Royal Borough of Windsor & Maidenhead.

Other organisations have ‘Observer’ status and participate in some activities, including: various Government agencies, National Highways and the West London Alliance (of London Boroughs) and London Borough of Hillingdon. The Group works closely with Heathrow and airport stakeholder groups such as Council for Independent Scrutiny of Heathrow Airport and Heathrow Area Transport Forum.

Q5. AGREE – but with some caution that schemes could progress significantly without having taken onboard external CAA review. Option3 will ensure publication of Milestone information on the websites (which we firmly support) and require external CAA approval before proposals move onto a consultation stage and interaction with other airports ACPs. A Gateway is required to ensure external review of the airport's / UKADS processes and option proposals.

A3 Proposal 2 Refining the definition of roles of proposer, change sponsor and partner

Q7 No comment

A4 – Proposal 3 Creating a new set of standard design principles which apply to all airspace change proposals

Q9. DISAGREE – This proposal could restrict the Design Principles to a standard set which in turn lean heavily on Aviation Navigation Guidance. Currently the guidance given in the ANG 2017 are very restricted and is also in process of review, change and public consultation by DfT – so the intentions and implications of CAA guidance relying on the DfT ANG are unclear. **HSPG are concerned that standardization will reduce sensitivity to local circumstances and could curb innovation.**

Notably – the ANG 2017(2.49) refers only to engagement on airspace design with ‘elected representatives’ – rather than Local Authorities as organisations (in contrast to references to the like of National Parks given). **It is vital that both the revised ANG and CAP1616 ensure engagement with Local Authorities at both technical and political level** – LAs have a large number of responsibilities and duties that closely relate to airports and use of airspace – not least environmental pollutions and protections, health and wellbeing, economy and land use planning.

We note that the **CAA do NOT see the airspace design process as the vehicle for determining the scale of appropriate use of an airport / airspace** – this matter is seen to be determined by the land use planning processes (including TCPA and NSIP – thus **underlining the vital interaction of airspace and land use planning processes) that must be better recognised in the CAP1616 and AMS processes.**

National Design Principles should require the inclusion of locally bespoke DPs developed with local stakeholders to address local circumstances. For example, requirements of runway and flight path alternation to provide respite and relief in the locally define most impactful manner, night flying restrictions, avoiding the overflying particularly sensitive areas local areas defined with stakeholders etc.

In addition, there may be **strategic scale Design Principles** (addressing groups of airports and flightpaths for example) – for instance managing the interaction of flightpaths to two airports over one area on the ground so that meaningful respite and relief can be achieved by the ‘system’.

Q10. HSPG strongly AGREE that a change sponsor should engage with stakeholders on local issues and circumstances – see response to Q 9. We also wish to highlight the importance of the Fair and Equitable Distribution (FED) report and ask that the review of CAP1616 includes an objective of embedding the FED Framework into regulation, encouraging earlier community engagement to take place.

A5 Proposal 4 - Reduce number of appraisals

Qs 11, 12 - No comment

A6 Proposal 5 – Combine Stage 1 and 2

Q13, HSPG **AGREE** that Stage 1 and Stage 2 be combined. This should make the process faster and more efficient.

Q14. HSPG AGREE with the proposed high-level overview of requirements. This is because it is important to identify local issues at an early stage so that they can be addressed later.

A7 Proposal 6 – Remove requirement for CAA to assess initial and full options appraisals?

Q15. UNSURE – while the desire to reduce unnecessary delay for external reviews of UKADS by CAA is recognised, HSPG are concerned that:

- 1) options appraisals do genuinely address **all** possible realistic options, and
- 2) that designers are ‘open’ to ideas and proposals emanating from outside of their internal ‘group think’.

Therefore, the optioneering process should be robustly externally scrutinised in a timely way. Leaving this only to the end of the process risks missing options and potentially significant delay if untested options then need to be assessed.

A8 Proposal 7 – reduce number of metrics in options appraisals**Q16.**

HSPG is **UNSURE** about reducing the number of metrics in options appraisal. Although efficiency benefits are desirable care must be taken to ensure thoroughness and transparency are maintained.

Q17.

HSPG is **UNSURE** about the shortened list of metrics proposed. The stated aim is to compare costs/benefits of different design option(s), so the removal of some cost elements does not appear consistent? It is also suggested that the appraisal metrics need not be the same as those used by the proposed UK airspace oversight review process.

Q18 – HSPG are of the opinion that the **current air noise metrics do not have sufficient regard to the harms caused to health and well-being of people living in impacted communities**. Airspace change must be informed by the scientific evidence on the adverse effects of noise and health and by metrics that properly represent the lived experiences of communities. An example of this are metrics which may emerge from the “Longitudinal Study to evaluate the Quality of Life and Health Effects of the Heathrow Noise Insulation Schemes” and the Aviation Night Noise Effects (ANNE) studies.

A9 Proposal 8 – UKADS to perform full and final options appraisals

Q19 HSPG is **UNSURE** whether the UKADS provider should be required to only perform an assessment of the end state design - because the provider may not be fully informed at the initial stage. There is also a concern about one body (UKADS) ‘marking its own homework’.

- Q20 HSPG agrees that the UKADS provider should not be required to quantify and/or monetise each deployment stage but it should be aware of the outcomes.

- Q21 DISAGREE HSPG consider that 10 years may be an appropriate duration in most cases – but discretion must exist to assess other durations that address the expected deployment period. e.g. Full utilisation of a new 3rd runway at Heathrow is forecast to take much more than 10 years from first use.

Q22 NA

A10 Proposal 9 UKADSs to assess combined and cumulative impacts at Stage 4

Q23 AGREE

Q24 DISAGREE It is **essential that assessment is carried out up to 7,000 feet (rather than 4000ft) to ensure that cumulative impacts are not excluded**. To describe this as unmanageable and dismiss the issue is not acceptable.

Q25 Awakenings from aircraft noise measured using physiological and self-report metrics, focusing on the probability of waking or sleep disruption from noise events, should be included. It is expected that metrics like L_{Max} for individual events or (L_{Night}) for overall night-time exposure, linking noise levels (dB) to the likelihood of awakening, sleep stage changes would be utilised. Existing metrics include PAWR (Probability of Aircraft-induced Wake-up Reaction) and standard noise metrics like (L_{en}) and (L_{Night})

A11 Proposal 10 – Remove 12weeks standard requirement on consultations

Q26 UNSURE – HSPG recognise that **new and innovative forms of consultation, publicity and engagement processes, including a series of highly targeted engagements enable a more flexible approach to be taken to ‘standard’ timing requirements**. However, HSPG do require significant reassurance that that **Gunning principles and adequate time is available to enable busy democratically run organisations to respond**, particularly to the major public consultations stages, for which 12 weeks is a realistic and proven standard timescale.

Arguably, as important an issue than timing is that need for **consultation material to be relatable to the audience appropriate to the question**. e.g. The London TMA system covers an enormous population and geography – **a particular community will be interested in what directly overflies or impacts their area, an airport or airline interested in a particular flight path or operation**. Too often no relatable and **relevant outputs are available or details become ‘buried’ in huge system wide consultation**. **This could mean that effective engagement in centralised UKADS led system wide engagements will be ineffective** unless great care is taken and planned engagements are sensitively targeted and ‘tested’ with relevant stakeholders before formal public consultations commence. Individual airports such as Heathrow have established the relationships with local stakeholders to do this – CAP1616 should ensure this strength is built upon and not lost in a UKADS sponsored standardised and system wide approach.

A12 Proposal 11 – Public evidence sessions

Q27 **AGREE** – public evidence sessions appear beneficial for transparency and enable early stage engagement with local communities / LAs that are most impacted by a particular emerging proposal. What constitutes a ‘high level of interest’?

Q28 AGREE**A13 Proposal 12 Cease the productions of draft decisions for checking purposes****Q 29 No Comments****A14 Proposal 13 – Consolidate Stage 5 Decide and 6 Implement****Q30 No comments?****A15 Proposal 14 Guidance on the type of information UKADS provide stakeholders prior to any deployment**

Q31 AGREE – see response to Q26 – the information provided must be clear and *relatable* to the audience impacted by an individual deployment.

A16 Proposal 15 Post Implementation Review

Q33 **AGREE** PIR is often quite misunderstood. The fact that it is **not** a review of the decision on airspace change may not be clear to local communities. A general point to make is that all too often local communities first become aware of air space changes during the implementation stage. As a result, the post implementation review becomes viewed as an opportunity to influence decision making. Generally, more should be done to ensure communities are aware of proposed air space changes at an earlier stage.

Q34 AGREE

Q35 HSPG would like to see aircraft noise complaints monitoring included

Q36 **DISAGREE** Due to the slow slot allocation change process and timescales taken for operations to build up to utilise newly released capacity, a period of longer than 12 months could be needed for post implementation changes to take full effect.

A17 Proposal 16 – RNAV, PBN for pre-scale airspace change proposals

Q37 No comments

A18 Proposal 17 BVLOS

Q38 UNSURE and Q39 UNSURE.

HSPG have **no comments** on the proposals for genuine occasional uses below 500ft that are questioned.

However, HSPG consider a potential proposals for a new mode of operation to provide deliveries by very low flying **BVLOS drone from a vertiport base to serve multiple 'home' delivery destinations to fall outside of the provision of Proposal 17** – this will require far more scrutiny and consideration with a range of stakeholders including local planning authorities.

A19 Migration policy

Q40 No comments

A20 Anything else?

Q41 – See response to Q38-39. We note the **CAA's Future of Flight BVLOS Roadmap (CAP3182 October 2025)** – this highlights the rapid pace to deployment of **BVLOS UAS systems and eVTOL taxis etc operating on a regular basis** at lower levels of airspace (below 4000 or 7000ft?) including to access new landing sites ((vertiports) or licensed facilities in existing non-licensed airfields, or to access existing larger commercial aerodromes such as Heathrow.

CAP1616 needs to be much clearer now about any special provisions or relaxations to be made for these operations. This is needed quickly - as the necessary T&CPA planning applications for location of landing sites and the scale of operation will be needed first - which may include assessment of noise and non-acoustic flight impacts. **The interaction of the two regimes needs to be improved including for any special provisions in CAP1616 in relation to AAM.**

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