

Response ID ANON-34E5-VKRF-T

Submitted to **Airspace change: a decision-making process for PPR (planned and permanent redistribution of air traffic) proposals**
Submitted on **2019-07-05 16:28:10**

About you

A What is your name?

Name:
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C If you are affiliated with any organisation, please tell us its name:

Organisation:

Not Answered

D Are you answering as:

Representative / national organisation or institute

E Where do you live or where is your organisation based?

South East

F Is there anything else that you would like us to know about you in connection with your response?

More info about respondent:

G Do you consent to your response being published?

Yes, with personal identifying information (name, organisation, respondent category, location, additional information - please note your email address will NOT be published if you choose this option)

General observations

1 Overall, what are your views on the CAA's proposed PPR decision-making process?

Significant modifications needed

Overall approach - comments:

The purpose of the new process is to "plug a gap" identified by the Government following a review of its guidance on airspace use and noise. AEF broadly welcomes the new process. However, we have a number of specific concerns about the proposals as set out in the consultation document (CAP1786).

1) As proposed, the new process appears to rely entirely on ANSPs voluntarily bringing PPRs forward to the CAA, based on information that they privately hold, with no comeback if they fail to identify a change that could be a PPR. It's difficult to see how an ANSP would feel motivated to go through the process, if this is the case, especially where assessment methodologies could be "complex and present a burden to the ANSP" [2.37]. It leaves a gaping hole in the process.

The consultation states that the CAA has no statutory function to require the air navigation service provider to go through the PPR decision-making process retrospectively if it later transpires that a change, once implemented, subsequently meets the qualifying criteria. [2.23]. It is unclear to us whether this means that the CAA considers it has no statutory OBLIGATION to satisfy in this regard, or whether it has no statutory POWER to act. If the latter, the CAA should, we suggest, be seeking whatever powers are required to deliver the PPR process effectively.

2) The CAA proposes that the "knock-on effects" – where one PPR proposal prompts a PPR at a neighbouring airport – should be treated as a package, but acknowledge that there is a problem with this:

"A change elsewhere may have knock-on effects that requires changes in air traffic control operational procedure at a different airport and therefore potentially by a different air navigation service provider." [5.15].

The CAA proposes to take a "pragmatic approach" and asks consultation respondents to suggest how the issue would be "managed effectively." We feel that suggesting an ad hoc approach is a significant weakness in the proposals, and that the CAA should have considered the issue in greater depth. Meanwhile, there is no mention at all of the cumulative noise impacts on communities overflown by more than one airport.

3) The CAA states that "The number of stakeholders potentially affected by a proposed PPR change will determine how extensive a consultation must be." [3.15]. Noise impacts may, however, be significant in rural areas where ambient noise is relatively low, even if population numbers are small. The CAA should confirm that such communities will need to be effectively consulted.

4) The CAA proposes that responses to a PPR consultation will be categorised by an ANSP "into those that present information that may lead to a change in the PPR proposal and those that could not" [Table 5.1] Individuals and communities may not have access to the kind of technical advice that would enable them to respond in a way that would ensure their views are taken into account. They may nevertheless be using the consultation as a means of expressing legitimate concerns about the airport's operation.

ANSPs should be required to consider all consultation responses whether or not they provide information that may lead to a change in the PPR, and, if appropriate, information should be fed back to the relevant airport to handle. This is particularly important given the potential lack of transparency about the PPR process compared with airspace changes made under CAP1616.

5) When a new process for airspace change proposals was introduced last year, the CAA set up an on-line portal where proposals are published and monitored, along with stakeholder comments and other relevant documentation. The intention was to help create transparency and trust in the system. By contrast, when the new system commences in 2019, relevant PPR proposals will not be published on the CAA's on-portal straight away, due to the way that operational procedure changes are currently submitted. The CAA foresees only that PPR proposals will "eventually" be published on the portal. Notwithstanding technical difficult this task poses, the CAA should attempt to provide a time-scale for publication of relevant PPR proposals.

Identifying a 'relevant PPR'

2 Do you have any comments on the way the CAA is interpreting the definition of a 'relevant PPR'?

CAA definition of RPPR:

AEF has concerns about the thresholds set for a Type 1 PPR. A relevant PPR of this type will include changes to written operational procedures anticipated to increase air transport movements using a Standard Instrument Departure (SID) by at least 5000 movements per year. [2.39]. Not only, in our view, is the increase threshold rather high, but in addition if there's more than one SID, departures will be counted separately, and the possible cumulative effect of this is specifically excluded.

It would be reasonable to add further criteria to the process, and we suggest that a relevant PPR could, for example, include:

- below 5,000, any proposal that doubles the number of existing overflights annually e.g. 2,000 to 4,000 (as a doubling of traffic would equate to a 3dB change in noise).
- any proposal where the increase in flights on any one day in the year is likely to be greater than 15.
- any proposal that increases the number of daily (nightly?) flights between 2300 and 0700 by more than 5.

All types should be subject to analysis of change over a period of time consistent with the advice on traffic forecasting in CAP1616. Rather than 24 months, this would mean assessing likely changes and whether they would trigger a PPR, over 10 years.

As the CAA is not under any obligation to reduce noise overall, and the criteria for a "relevant PPR" are too narrowly drawn, changes that could also increase noise impacts significantly fall outside of its scope. For example, changes that are made to airline operations, or occurring due to "natural growth", or expansion will be excluded. The CAA should consider how to address these gaps.

3 The CAA proposes that an air navigation service provider must introduce an internal 'trigger' process alongside its existing safety assessment that will always identify where a proposed change in air traffic control operational procedure is a 'relevant PPR'. Do you agree that this is the most appropriate way for an air navigation service provider to identify when it must follow our proposed PPR process before implementing such a change?

Don't know

Comments on trigger:

Para 4.3 establishes that it is the ANSP that "needs to establish very early on whether a CAA decision is required before a given air traffic control operational procedure change can be implemented."

Paragraph 4.4 states that an ANSP will be able to establish whether a relevant PPR has been triggered if it has an internal procedure in place. It goes on to state that it is thus "essential" for those ANSPs potentially in scope of the PPR process to rise to the challenge of developing "internal processes", and ensuring an adequate "staff skillset" in order to ensure sufficient capability to carry out a "PPR check". However, no timescale is given for the introduction of adequate internal procedures. While the CAA states that it is proposing to introduce guidance to ANSPs, there are no details about what form that guidance might take, and again, no timescale given for delivery.

An AEF member group at Stansted, has expressed a concern that community views and concerns about airspace change proposals from NATS have historically been side-lined and ignored. Community groups and individuals need clarity about how the "culture change" that the CAA states is necessary will come about; without it, negative experiences from community stakeholders seem likely to continue.

Proposed PPR decision-making process

4 Are there any aspects of the CAP 1616 airspace change process that you think are missing from our proposed PPR process and should be included?

Yes, something more is needed

Anything missing - comments:

In our response to the CAA's consultation on the airspace change process (that led to CAP1616), AEF stressed the importance of giving communities the opportunity to comment on the statement of need, and any the rationale presented. For the same reasons, we suggest that any PPR consultation should include a similar opportunity for community input at this stage.

The process will not be implemented before 1 November 2019. CAP1786 should include a requirement that operational changes that would fall within the definition of "relevant PPR", should follow the spirit of the upcoming process.

5 Where a PPR is proposed, can multiple workable options be developed for the change in air traffic control operational procedure, or are the only options either to do the PPR or to do nothing (i.e. a binary choice)? Please answer for each of the three types of relevant PPR.

Multiple or binary options? - Type 1:

Don't know

Multiple or binary options? - Type 2:

Don't know

Multiple or binary options? - Type 3:

Don't know

Multiple options - comments:

ANSPs should be transparent about why an option is not being taken forward.

6 Do you agree with our proposal that it is the air navigation service provider which produces a post-implementation report (as to whether the change has had the impacts and benefits predicted) rather than the CAA?

No, something more is needed

PIR as ANSP report - comments:

AEF does not agree with this proposal. ANSPs are already given wide discretion over PPRs, and do not yet possess the adequate internal processes and culture. It will be difficult for communities to have confidence in this process being delivered fairly without any process by which an ANSP will be held to account.

Temporary changes

7 Do you agree with the CAA's proposal that it would be proportionate to apply a scaled process for a temporary 'relevant PPR' proposal lasting no more than six months?

Yes

Temporary changes - comments:

We agree that there should be a process for a temporary relevant PPR. We are concerned about the proposal to exclude community stakeholders from consultation, however.

Implementing the new process

8 Is there anything specific that the CAA can do to aid the implementation of our proposed PPR decision-making process?

CAA aiding implementation:

At paragraph 3.8 CAP1786 states that "The CAA is expected to produce an environmental statement when approving a relevant PPR". Stakeholders need to know on what basis an application is approved or rejected and need a stronger undertaking than this. We suggest the following as an alternative wording: "The CAA will produce an environmental statement when approving or rejecting a relevant PPR."

Several of our members have questioned the lack of a formal role for ICCAN in the CAA's proposals for PPR. Since ICCAN's primary function is to assist in the process of airspace change, a specific oversight role, especially in the early stages of delivering the PPR proposals, would be welcome.