

**CAA consultation on Airspace Change: a decision-making process  
for PPR (planned and permanent redistribution of air traffic)  
proposals**

**Responses submitted by email**

**(where permission has been given for publication)**

**Some personal information has been redacted by the CAA**

Airport Operators Association (AOA)

Bridget Bell

Communities Against Gatwick Noise and Emissions (CAGNE)

Chiddingstone Parish Council

Dacorum Borough Council

High Weald Councils Aviation Action Group

ICAMS

Lasham Gliding Society

Leigh Parish Council

London Borough of Hammersmith and Fulham (H&F)

Nuffield Conservation Society

Parish Councils Airports Association

Plane Hell Action SE

Richmond Heathrow Campaign

Salfords and Sidlow Parish Council

Stop Stansted Expansion



**Airport Operators Association response to the CAA Consultation on a decision-making process for PPR (planned and permanent redistribution of air traffic) proposals**

**Introduction**

1. Founded in 1934, the Airport Operators Association (AOA) is the national voice of UK airports. We are a trade association representing the interests of UK airports, and the principal such body engaging with the UK Government and regulatory authorities on airport matters. The AOA's members include over 50 airports and 160 Associate Members, made up of companies representing a wide range of suppliers in the aviation industry.
2. The AOA is also an active member of Sustainable Aviation, the UK coalition of airports, airlines, aerospace manufacturers and air navigation service providers that sets out a collective and long-term strategy to ensure a sustainable future for UK aviation; additionally, the AOA are also partners of the 'Our Future Skies', an industry campaign group making strategic case for airspace modernisation.
3. The AOA is supportive of government and industry efforts to modernise the UK's upper and lower airspace. It is keen to maintain a national conversation on the benefits of modernisation and helps to share best-practice amongst our member airports.
4. The AOA welcomes the opportunity to respond to the CAA Consultation on a decision-making process for planned and permanent redistribution of air traffic. Broadly the AOA believes that the process should be as proportionate as possible, particularly where PPR changes would have negligible or limited impact on stakeholders.

**AOA Responses to CAA Consultation Questions**

5. Overall, what are your views on the CAA's proposed PPR decision-making process?
  - a. The AOA supports the concept, in principle, of a change process for changes to air traffic procedures – for those procedures which will have an impact on the experience of those on the ground.
  - b. However, the AOA does not believe that the Air Navigation Service Provider (ANSP) should be the only possible lead this change process. The process should at the very least, be open to co-sponsored led changes by the airport operator, particularly in instances where the routing or frequency of air traffic below 7000 feet will potentially affect airport-community relations.
  - c. The AOA requests greater clarity on the proportionality of the scalable approach and how it might fit with the CAP1616 process. The CAP1616 process has been criticised in the past for potentially preventing change required urgently by stakeholders, because of its lengthy, expensive, and complex nature.
  - d. The AOA believes that in cases where clear environmental benefits can be realised, and the airport local community is supportive – recognised through agreement with the Airport Consultative Committee – there should not be an absolute requirement to proceed with a PPR process.

6. Do you have any comments on the way the CAA is interpreting the definition of a 'relevant PPR'?
  - a. No comments.
  
7. 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?
  - a. The AOA agrees that a trigger process must exist alongside the safety assessment to ascertain whether any change falls within the PPR criteria.
  - b. The AOA believes that the Airport should, if not lead, then at the least co-sponsor the change process and that the ANSP should consult early with the airport operator. Within any trigger process, the ANSP should be required to demonstrate that the airport operator has been engaged and comprehensively consulted.
  - c. The AOA would suggest the creation of a single repository for all PPR applications where the qualifying criteria has been met; this must be transparent to all sponsors. This list should show the date applications were lodged, other relevant stage dates, status and stage of consideration.
  
8. 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?
  - a. Given airport experience with CAP1616, the AOA asks that a set of response timescales for the CAA are developed at each decision point, to prevent the build-up of a backlog.
  
9. 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.
  - a. The AOA is of the opinion that the number of options available should not be a defining feature of duration or extent of the decision-making process when consultation and engagement is required. In general, this should only be answered on a case by case basis.
  
10. Do you agree with the CAA 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?
  - a. The AOA supports the proposal for the post-implementation report (PIR) to be completed by the sponsor of the PPR change, whether that be the ANSP or airport operator.

- b. However, it should be noted that smaller ANSPs and airport operators may not have the resources or technology such as noise and track-keeping systems to fulfil the requirements of the PIR.
  - c. The AOA would request that the CAA make clear the aspects of the change which are to be consider in a PIR, the extent of evidence to be collected and the quality standards that will be applied to data and analysis.
  - d. The AOA believes the requirements of the PIR should be kept to an absolute minimum and that it ascertains whether the change has generated the expected impacts. This report should also be proportionate to the change introduced.
11. 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?
- a. The AOA agrees with a scaled process for a temporary relevant PPR proposal.
  - b. The AOA believes that this scalable approach should be used for all PPRs in the first instance, and only when significant concern from stakeholders is raised, should it follow a more CAP1616-esque process.
12. Is there anything specific that the CAA can do to aid the implementation of our proposed PPR decision-making process?
- a. The AOA believes it should be acknowledged that not all ANSPs have access to the same level of airspace change resource – such as analytical software and human resource – compared with the larger national ANSP providers such as NATS.

*For further information, please contact AOA Policy and Public Affairs Officer*



## **Airspace change: a decision-making process for PPR (planned and permanent redistribution of air traffic) proposals**

Emailed to: airspace.policy@caa.co.uk  
Date: 5 July 2019

A. What is your name?

B. What is your email address?

D. Are you answering as:  Resident affected by aviation

E. Where do you live South East

I would be grateful for your acknowledgement of receipt. Thank you.

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

Answer: Significant modifications needed

As an overview: there is insufficient importance given to the communities affected by PPR despite the fact that they are the first item on the list of 'who is affected by a relevant PPR' on page 27 of the consultation document. Instead, this consultation represents only the needs of the aviation industry and aviation decision makers with the rider of air safety and efficiency. Harm to the community should be paramount when it comes to PPR.

For those affected by Heathrow: it is not acceptable to set the clock on PPR to run from November 2019. Producing the consultation at this time is an admission of CAA failures to monitor flight path changes/adjustments made in recent years without consultation. i.e. CAA has failed to follow due process and/or to monitor ANSP failure to follow due process. Since July 2016 clear changes have occurred in the arrival swathes for approaches to LHR, resulting in concentrated paths and affecting the quality of life and health of residents in a way that Government is only now prepared to understand. This provides every reason to consider retrospectively the reversal of those 'relevant' and other PPRs that were introduced By stealth before November 2019.

There are too many types of PPR, with only one type under consultation in this document. This allows ANSPs freedom to change flightpaths with CAA support for a for a 'no consultation requirement' approach.

The consultation avoids any discussion of the Government's guidance to the CAA, the ANG17, yet it is often referred to in the consultation document. Its importance needs to be included in this response since it is through the ANG17 that the Government directs the CAA to have duty of care for the overflown i.e. 'a change in noise distribution resulting in a 10,000 net increase in the number of people subjected to a noise level of at

least 54 dB LAeq 16hr and have an identified adverse impact on health and quality of life' requires a re-think in terms of airspace proposals.

Where any change results in increased adverse effects I support the following approach: "Where there is a reduction in overall noise the benefit be distributed proportionately to those already most affected and where there is an increase in overall noise the disbenefit be distributed proportionately to those already least affected."

1. The name Planned Permanent Redistribution is misleading: no change should be 'permanent' where it causes harm to the health of the overflown. 'Redistribution' is generally defined as "more widely spread, typically to achieve greater social equality". PPR under consultation will ensure precisely the opposite by narrowing and concentrating flight paths to ensure more noise over less people for all operational hours.

2. Changes to arrival routes into LHR and LCY have been operationally modified over the last 4-6 years. These so-called 'historic' PPRs were introduced without following due process and they need to be accounted for in this consultation document. There must therefore be provision for a PPR, or within the PPR process, that allows a return to patterns/operations of previous years. In line with the already-mentioned "Where there is a reduction in overall noise the benefit be distributed proportionately to those already most affected and where there is an increase in overall noise the disbenefit be distributed proportionately to those already least affected" is the provision for residents only affected by debilitating noise as a result of these changes that pre-date PPR introduced without due process. This consultation should not impose a non-consultated change on residents.

3. Wording contained in the consultation document is nebulous of

- p23 2.2 'environmental objectives' is too vague and must specifically call out problems of noise
- p29 'anticipation-base' needs a detailed definition
- p29 2.21 'any other additional relevant information' needs a detailed definition
- p29 2.23 it is not acceptable that a PPR once implemented and then found to have disbenefits on health and quality of life should not have that PPR 'called in'.

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

1. Keep the definition of PPR simple and have just 1 PPR for sake of clarity with the general public who may be or already are affected.

2. The term Planned Permanent Redistribution is open to misinterpretation or misunderstanding. It should be reviewed and changed: see answer to the previous Question 1.

3. In criteria 1 there are no indications of 'specified' distance.

4. It is apparent that the proposed system of PPR allows ANSP/CAA to give the easy



answer 'nothing has changed' when asked by the overflowed about increases in plane noise. A PPR already have and will continue to achieve this answer by:

- a. constricting flights in an ever-narrower lateral swathe without moving the actual flight path, thereby avoiding public consultation i.e. communities are gagged from saying 'these planes are too concentrated, please spread them' or
- b. adjusting where planes join into the ILS without moving the specified join point itself.

5. It is concerning that the system of 'relevant' versus 'not relevant' PPR allows an ANSP to make a change overnight without consultation. Yet, if communities complain about the effects of such a change they will be told 'this will require a 2-year consultation' for no good reason except that CAA holds all the cards. It is vital to note here that our points 4(a) and 4(b) above have already occurred for arrivals into LHR during westerly operations, as noted earlier, and that the PPR process is only now being spelled out, with retrospective (historic) PPRs given the strength of law to prevent residents seeking a return to the previous and less punitive arrival proced

**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?**

No:

1. Too much responsibility is entrusted to the ANSP.
2. Consideration must be given to a fair and proportionate balance of noise/pollution footprint as per the noise objectives of the ANG17 and the new objective proposed by the Community Noise Group: "Where there is a reduction in overall noise the benefit be distributed proportionately to those already most affected and where there is an increase in overall noise the disbenefit be distributed proportionately to those already least affected."
3. cf p31 too many types of PPR: relevant/proposed/temporary/and any other description an ANSP provider and/or CAA care to use when challenged over a flight-path change. i.e there is room for manoeuvre by ANSP provider/CAA and this must be prevented. There should only be one type of PPR if, indeed, it is necessary at all with PBN also in the mix
4. there should be no opportunity for an ANSP to suggest what is 'relevant', 'proposed' or 'temporary'
5. there is too much reliance on the word 'relevant' without any solid, simple guidelines to determine precisely what is the aim of introducing PPR routes
6. ANSP can narrow the flightpath without consultation but claim they cannot/will not disperse them without a consultation.

**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?**

Not answered. This does not imply a leaning towards any of the offered answers and the lack of answer must not be used to weight the reply the CAA is looking for.

**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.**

Type 2: departures - currently does not affect SE London unless departure heights from any of Heathrow, City or Gatwick over SE London reduce to below stated 10,000ft

Types 1 & 3:

1. Noise must be at the forefront of all decision-making processes. The only fair decision is to share multiple approaches of objective: *"Where there is a reduction in overall noise the benefit be distributed proportionately to those already most affected and where there is an increase in overall noise the disbenefit be distributed proportionately to those already least affected."*

2. Safeguard the health of those overflown with relevance to heavily overflown: The only fair decision is to share multiple approaches ref CNG objective: *"Where there is a reduction in overall noise the benefit be distributed proportionately to those already most affected and where there is an increase in overall noise the disbenefit be distributed proportionately to those already least affected."*

**Q6 Do you agree with CAA proposal that ANSP should produce PIR rather than CAA?**

Answer: No, something more is needed

1. No stakeholder, not ANSP provider, not CAA, not communities should provide the PIR
2. an objective organisation such as AEF (Aviation Environment Federation) should make the report

**Q7 To agree a scaled process for a temp. 'relevant PPR' lasting no more than 6 months**

Answer: No

1. the suggestion of a 'temporary' PPR makes a nonsense of the name of this flight path when the name incorporates the word 'permanent'. Is this simply a way of introducing another change without consultation and leading to a permanent change?

**Q8 Is there anything specific that the CAA can do to aid the implementation of proposed PPR decision-making process?**

Answer: Yes

1. address the lack of honesty and openness in your and ANSP organisations
2. address the lack of consultation of 'historic' PPR and revert to earlier flightpath patterns of July 2016/Heathrow
3. mark which chapters are relevant to each question: many of the respondents will not be industry employed and probably do not have all the expertise but they are fighting for a decent existence on **an uneven playing field that is weighted always in favour of the industry.**
4. Print the response options on the opening pages of the consultation document i.e. postal address, email address
5. Ensure your Reception Staff are briefed on a daily basis about consultations and the fact that the public may ring and ask for a postal or email address.



**CAGNE**

**Communities Against Gatwick**  
**Noise and Emissions**

umbrella community group for Sussex and Surrey

CAA Consultation questions in red -

GENERAL OBSERVATIONS

Question 1: Overall, what are your views on the CAA's proposed PPR decision making process? About right Minor modifications needed Significant modifications needed Don't know Please explain your answer and provide any other general comments. =

Significant modifications needed. Whilst this exercise is welcomed we note that the new process is not required for a PPR implemented before 1 November 2019 and that only an air navigation service provider can propose a relevant PPR. .

It is also disappointing that the reasons for the new process and how a relevant PPR is defined are not in scope of this consultation. There are too many exclusions listed in the document for this to be a meaningful exercise specifically the omission of NPR's from the exercise. This is particularly disappointing given the DFT's announcement in May 2019 regarding the future of NPR's (SID).

We note that you anticipate that the following stakeholders are affected by the proposed PPR process and will therefore have an interest: communities affected by aviation noise or other environmental impacts, their representatives, councils and other elected representatives. We sincerely hope that the CAA is serious about this and ensures that it happens as it appears to be sadly missing from some other recent "consultations" happening.

We find the proposed PPR is something that is to be agreed through the industry in consultation with the CAA. This is unacceptable as it does not allow for third party interests to play a role nor for any decisions to be challenged via an ombudsman.

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.

Any change that moves noise whether it be a with joins to the ILS (stage 1), new distribution of SID ATMS (stage 2) must all be dealt with in a full and transparent manner consulting all to be impacted via a full CAP 1616 process as what is implied could be, in Gatwick's case, a join to the ILS at less than 8nm and a removal of Secretary of State NAP at night at Gatwick ie not to join at less than 10nm.

What is proposed through this process could enable areas to be newly overflowed; using new technology such as CCO below 7,000ft which will significantly increase noise especially as rural areas seem to be targetted by such a process and government.

#### IDENTIFYING A 'RELEVANT PPR'

Question 2 (optional): Do you have any comments on the way the CAA is interpreting the definition of a 'relevant PPR'?

**No - this appears acceptable**

Question 3 (optional): 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? Yes No Don't know Please explain your answer, and whether any specific guidance from the CAA would help.

**Yes, there must be the catalyst for implementing change. Specific guidelines from the CAA regarding this are essential. We however find it inappropriate for the CAA to rely upon the service provider to present 'trigger' points when it should be mandatory for the CAA to govern and instigate the trigger for a PPR process.**

As the CAA is not under any obligation to reduce noise overall, and the criteria for a "relevant PPR" are quite narrowly drawn, changes that could also increase noise impacts significantly fall outside of its scope. Changes that are made to airline operations,

or occurring due to "natural growth", or expansion will be excluded. Similarly, various kinds of cumulative impacts are either poorly addressed, or not addressed at all.

#### PROPOSED PPR DECISION-MAKING PROCESS

Question 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 No Don't know If you answered yes, please say what they are and why. CAP 1786 Summary of this consultation and how to respond May 2019

**Yes as follows. We have already identified potential shortfalls in the CAP 1616 process and logged these with the CAA. The consultation process needs to be mandated to ensure that all stakeholders are included including parish councils.**

**We are gravely concerned that this process is to be used by the CAA and the service provider to implement change without a full CAP1616 process ensuring all parties to be impacted are fully consulted in a transparent way. We use the CAP 1616 process that Gatwick Airport has implemented for Route 4 and FASIS. Gatwick has cherry picked who they consult, not allowing for detailed explanation of what is being proposed to stakeholders as such misleading them over potential impacts of airspace change, removal of NPRs, and flying over new areas using 'resilience' and new technology to hide true ramifications of airspace changes,**

Page 12 Question 5 (optional): 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. Type 1 Multiple Binary Don't know Type 2 Multiple Binary Don't know Type 3 Multiple Binary Don't know Please provide any additional comments.

**We would expect multiple workable options to be developed and considered for the change in air traffic control operational procedure. A simple binary choice is unacceptable. We believe that this applies to each of the three types of relevant PPR.**

Question 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? Yes No, something more is needed Don't know Please provide any additional comments.

**Yes as we believe that this provides for a separate and relatively independent review to be undertaken by NATS but there must be a**

process by which the findings can be challenged by a third party/ ombudsman.

We do believe however that that any report produced is in the public domain and is subject to consultation and feedback by stakeholder groups.

#### TEMPORARY CHANGES

Question 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 No Don't know Please provide any additional comments.

**Yes this appears acceptable under the circumstances**

#### IMPLEMENTING THE NEW PROCESS

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

**Yes the CAA must take responsibility for owning this process and for ensuring that the consultation process is meaningful and as wide as possible. We also feel that, with so many other significant changes happening at present (i.e. NPR,s - see above and FASIS) that the CAA ensures that there is some degree of co-ordination around these and that issues are not decided in isolation.**

All consultation processes currently take airspace in isolation not looking to the ramifications a set of airspace changes has on other airspace. We urge the CAA to include the 'totality' of airspace noise when considering changes such as with Stage 1 and 2.

Additionally, a relevant PPR 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. Not only, in AEF's view, is the increase threshold pretty high – if there's more than one SID, departures will be counted separately, and the possible cumulative effect of this is specially excluded.



**Sent:** 07 July 2019 16:46  
**To:** Airspace Policy  
**Subject:** CAA PPR consultation

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Sirs

Chiddingstone Parish Council fully supports the response submitted by the Aviation Environment Federation to this consultation.

Kind regards

Louise Kleinschmidt

Clerk, Chiddingstone Parish Council



Date: 9 July 2019  
Your reference:  
Our reference: Airspace/JD  
Contact: James Doe  
Email:  
Direct line:



Civil Aviation Authority  
Aviation House  
Gatwick Airport South  
West Sussex  
RH6 0YR

The Forum  
Marlowes  
Hemel Hempstead  
Hertfordshire  
HP1 1DN

BY EMAIL: [airspace.policy@caa.co.uk](mailto:airspace.policy@caa.co.uk)

Dear Sir / Madam

**Airspace change: Consultation on a decision-making process for PPR (planned and permanent redistribution of air traffic) proposals**

Thank you for the opportunity to comment upon this important topic.

Dacorum Borough Council acknowledges the role that aviation has to play in achieving a vibrant economy, both nationally and locally. We wish to see future growth in aviation being achieved in a sustainable manner and in a way which seeks to minimise and mitigate any adverse impacts and also, where possible, enhances the environment in which it operates.

Although no airports are located within our Borough aircraft noise has become an increasingly major issue for our residents in recent years. They have been particularly affected by an increase in air traffic departing over the District and the introduction of RNAV at London Luton Airport (LTN). Within our Borough Markyate and Flamstead villages are both less than a kilometer from the Westerly flight path from Luton Airport which bears approximately 70% of outgoing flights from that airport. Noise problems caused by LTN air traffic are exacerbated by the low height restrictions imposed by other airspace users and the incorrect assumption that narrowing of the flightpath using RNAV will reduce noise impact, which has not been the case.

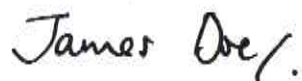


Also, departures from Heathrow airport regularly fly over our Borough at a relatively low height causing noise disturbance. Our residents are very interested in these issues.

We have seen the response to the consultation submitted by St Albans City and District Council (SADC) with whom we share many concerns regarding aviation issues and fully support the views and opinions expressed in their response.

We appreciate that the deadline for responses expired on 7 July but nonetheless request that you give consideration to the views expressed in this response.

Yours faithfully

A handwritten signature in black ink that reads "James Doe". The signature is written in a cursive style with a clear first name and a last name.

**James Doe**  
**Assistant Director (Planning, Development & Regeneration)**

**Sent:** 07 July 2019 16:45  
**To:** Airspace Policy  
**Subject:** CAA PPR consultation

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Sirs

High Weald Councils Aviation Action Group fully support the response submitted by the Aviation Environment Federation.

Kind regards

Louise Kleinschmidt

Clerk, HWCAAG



To: [REDACTED]  
Subject: Airspace Policy  
RE: Airspace change: a decision-making process for PPR proposals

From: [REDACTED]  
Sent: 12 July 2019 08:54  
To: Airspace Policy <Airspace.Policy@caa.gov.uk>  
Subject: Airspace change: a decision-making process for PPR proposals

Dear Sir/Madam

I am aware that the consultation on the proposed PPR decision-making process has closed but, if possible, please could you accept the following comments from the Industry Coordination for the Airspace Modernisation Strategy (ICAMS).

The delay in responding was due to the need to collate and agree the responses from the broad industry group that ICAMS represents.

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

**Significant modifications needed**

Greater clarity is required on the proportionality of the scalable approach and how it fits with the CAP1616 process.

There is insufficient guidance on how a relevant PPR will be incorporated or integrated into the CAP1616 process and what level of change it will be considered equivalent of.

The CAP1616 process is lengthy and complex and it would not be proportionate for many changes that meet the classification of a 'Relevant PPR'. This includes temporary changes of less than 6 months, for example, the planned or unplanned outage of a ground-based Nav Aid would require a Temporary Operating Instruction which may result in changes fitting within the Type 1, 2 or 3 definition. Another example would be a small number of flights being vectored differently (e.g. as per Fig 2.3), or perhaps no longer vectored but left on a route, changing the centreline of that traffic and triggering a relevant PPR even though it could be a very small number of flights. It would be logical to add thresholds based on the number of movements for Types 1 and 3 as well as 2.

The time required under CAP1616, even if scaled down significantly may exceed the time possible before a small change and/or the time allotted for a temporary change. A better definition of the scalable solution needs to be provided before a view on acceptability of the draft CAP can be fully assessed.

Airports should be able to progress a PPR, for example where an airport has CAS within which routes (SIDS/STARS) could be adjusted. According to the draft document, only an ANSP can progress a PPR, but why should the ANSP have to front an airport project?

Could it be clarified what happens if factors outside the airport's/ANSP's control result in aircraft being unable to fly a procedure, e.g. long term equipment / nav aid failure or the effect of neighbouring airport operations?

Could it be clarified how the 5000 movements per year threshold will be triggered and managed. Will it be a potential barrier to airport growth strategy, e.g. if a new airline operator is attracted to an airport and movements on an existing SID were to increase by more than 5000 movements?

Thanks & Regards,  
[REDACTED]





To: Airspace Policy; [redacted]  
Subject: RE: CAP 1786 consultation response

Dear Sirs

Please find below Lasham Gliding Society's considered response to your CAP 1786 consultation.

These overall but critical comments do not follow the numbered questions in the Consultation Document, although the BGA's response does.

With kind regards

### **Lasham Gliding Society Comments In Regard to PPR Consultation CAP 1786**

Lasham Gliding Society supports the response to this Consultation submitted by the BGA. However, we wish to make the following important points.

As an initial summarising comment, the CAA needs to maintain oversight and should not abdicate all responsibility for this. An ANSP is biased towards not initiating a PPR ACP. There needs to be a mechanism for other groups to request that a PPR ACP be conducted and there also needs to be an appeals process. Thus, significant changes are needed.

We make the following specific points:

1. The CAA should have regulatory oversight of an ANSP's procedure. Significant changes are needed. The weakest point is the reliance on an ANSP to identify the need, then to undertake (or not) a PPR ACP. The CAA needs to formally oversee this. It should also not be left to an ANSP to develop a process. The process should be part of the regulatory procedure and overseen by the CAA.
2. Allowing ANSPs alone (e.g. NATS) to decide whether a change has worked in practice is wrong due to the obvious conflict of interests. The CAA must conduct a PIR, as it currently is required to do for CAP 1616 ACPs.
3. We reject a scaled process for a temporary PPR. The 'scaled' process, like the 'main' PPR process, has flaws which must be resolved. Whether a 'scaled' process is satisfactory depends on whether the issues relating to both processes are addressed and resolved to the satisfaction of consultees.
4. If an airspace change is made without a PPR ACP and it then becomes clear that a PPR ACP should have been undertaken, the CAA must be able to enforce this. Passing this decision upwards to the DfT is wrong.

5. Furthermore, when a full ACP is proposed it should consider all users and all impacts. If it does not, it has not met the criteria of a full ACP. If one or more PPR ACPs appear after a nearby full ACP has been approved, it indicates a failure of the full ACP process, since it impacts on neighbouring airports.
6. There needs to be an appeals process for stakeholders to request that the CAA intervenes to review whether a PPR ACP should be undertaken.
7. It is important that a review of current ACPs is required to determine which may lead to consequential PPR ACPs.
8. There also needs to be a mechanism to ensure a proposed change is promulgated to stakeholders even if an ANSP determines no PPR ACP is required

**Sent:** 07 July 2019 16:47  
**To:** Airspace Policy  
**Subject:** CAA PPR consultation

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Sirs

Leigh Parish Council fully supports the response submitted by the Aviation Environment Federation to this consultation.

Kind regards

Louise Kleinschmidt

Clerk, Leigh Parish Council



**To:** Baker Paul: H&F  
**Subject:** RE: CAA Consultation response

From: H&F  
Sent: Tuesday, July 2, 2:39 PM  
Subject: FW: CAA Consultation response suggestions  
To: H&F

## Question 1

### RESPONSE: SIGNIFICANT MODIFICATIONS NEEDED

**Comments:** As highlighted below we consider that the proposals as they stand could allow significant changes to occur, that create a significant and noticeable worsening of the noise environment for communities under flight-paths with little if any recourse available to those affected in terms of compensation or mitigation. The proposals require significant revision and re-consultation (on a much wider scale to ensure that impacted communities have a further chance to assess the proposals and comment). The process is extremely complex and difficult to understand. We are concerned that this could impact on its implementation and could cause misunderstandings to arise. Consideration should be made to simplifying the process.

## Question 2

### RESPONSE: CONCERNED ABOUT THE APPROACH

**Comments:** It is unclear how the relevant PPRs have been chosen – i.e. was a process of shortlisting and elimination carried out prior to publishing the consultation document? What criteria have been used to define what is and what isn't a relevant PPR? We are told that "Relevant PPRs are the PPRs most likely to have a potential noise impact on the ground", but who has played a role in deciding this – have any community stakeholders been involved? The fact that how a relevant PPR is defined is not in scope of this consultation is concerning as we and other stakeholders may have issues with this that cannot be resolved.

We note that if there is any doubt about whether a proposed PPR falls within Type 1, 2 or 3, the air navigation service provider, or airport as appropriate, should consult the CAA. The CAA will determine whether or not the proposed PPR is a relevant PPR and that they will do so by considering the air navigation service provider's own assessment of the proposal and any other additional relevant information that allows them to consider that assessment and to make their determination. It is not clear how organisations or stakeholders other than the airport or ANSP would have the opportunity to know about a proposed PPR or to contribute information to the CAA on its determination.

With regards to the 3 types of PPR:

Type 1 – the proposed lateral horizontal distances are too wide and it would be possible for significant noise impacts to be caused by changes that are classified as not triggering the PPR process.

Type 2 – an increase of 5,000 movements per year is too high as the trigger for the PPR process. How has 5,000 been chosen?

Type 3 – we consider that 36 months is too long a time period to take into account and the trigger should be a shorter period – e.g. closer to 12 months maximum.

When setting specific "triggers" in this way, how will CAA stop the "gaming" of the PPR system, for example what happens if an ANSP seeks to make changes which create 4,999 additional movements, not 5,000? Would this avoid the PPR requirements? Are the impacts of 4,999 flights such that they would not

have the same impacts as 5,000? As illustrated, we have concerns about how the new PPR approach will be implemented. There needs to be a review mechanism in place that would allow the CAA to “call-in” any change for review to see if the potential impacts are significant and need to be processed as a PPR.

### Question 3

#### RESPONSE: NO

**Comments:** We note that the CAA's role in determining whether or not a given proposal is a relevant PPR is at the request of the Air Navigation Service Provider. We don't think the CAA should be putting itself into a position where it could only act in the event of being invited to do so. It should have an independent and unilateral right to intervene. If the original approach is not amended in this way, at the very least the CAA should indicate that they will intervene at the request of not just the ANSP, but also at the request of other stakeholders, such as local authorities, residents groups etc who could be impacted by proposed changes in airspace use.

We also note that once the new PPR function takes effect that it will be only the Air Navigation Service Provider that knows that an air traffic control operational procedure change is under consideration. We therefore do not understand how potentially impacted communities are to be consulted on proposed changes as it appears that this will not occur under the proposed approach. This is wrong. The CAA knows that there are cases of airspace change that have been made in the past (e.g. the trials carried out at Heathrow in 2014) where communities were not informed or consulted and it created significant impacts. Communities need to be consulted prior to changes being implemented so that proposals can be amended where necessary.

We are concerned that ANSPs seem to have so much control over the PPR process with little oversight by the CAA (unless invited to do so). We envisage that the proposed process will not be adequate to prevent significant noise impacts from occurring and are concerned that potentially large populations could be impacted by these airspace changes – whether they are processed through the PPR process or not.

### Question 4

#### RESPONSE: YES SOMETHING MORE IS NEEDED

**Comments:** The main issue we have with the current proposals in terms of missing out aspects of CAP 1616 relates to consultation. As highlighted above, it appears to us that an ANSP can decide on making a change to airspace use, then implement that change (potentially without input from the CAA) without any consultation with the communities in the areas where that airspace change will create noise impacts. A keyword search of the CAP 1616 document finds 467 mentions of “consultation”; a similar search of the CAP 1786 document on the proposed PPR decision making process finds zero references to “consultation”. This highlights a key failing in our view and it seems inevitable that the lack of consultation will cause impacts for and complaints from those affected.

### Question 5

#### RESPONSE: UNSURE

**Comments:** This is difficult to answer as there is very little information provided in the consultation document to help assess the benefits or otherwise of following either a “Multiple” options approach or just a “Binary” approach. Without having access to further background information or worked examples, we suspect there could be advantages to following the multiple options route in identifying the best option – in a way that a binary approach could miss – however, this could be more complex process and be more difficult for stakeholders such as potentially impacted communities to understand. Further consideration is required on how to ensure an optimised approach is taken.

### Question 6

#### RESPONSE: NO

**Comments:** As the CAA will be aware – and as recognised by ICCAN in their recently published draft Corporate Strategy - in some areas of the country, the trust between airports and their communities has broken down. ICCAN identify that this is for a number of reasons, including that, "This might be due to broken promises made during previous airport expansion, development or airspace changes, or a perceived lack of transparency in the way airspace change decisions are made".

We therefore consider that the proposal that the Air Navigation Service Provider (ANSP) produces a post-implementation report on whether the PPR change has had the predicted impacts or benefits is a bad idea. This needs to be done independently of the ANSP (but with their input) otherwise there is a risk that the findings will not be accepted, given that the current proposals would effectively entail the ANSP assessing their own performance.

#### **Question 7**

**RESPONSE: NO**

**Comments:** 6 months is too long a period to allow a PPR change to occur without the need to be assessed through the full decision making process. The consultation document confirms that PPRs could in some circumstances have significant noise impacts on the same scale as those arising from major changes in airspace design. The "scaled" process should only be used for much shorter, temporary proposals.

#### **Question 8**

**RESPONSE: YES**

**Comments:** The CAA could have publicised the consultation much wider to ensure a broader range of representations from those who could be impacted by the proposals. We expect comments will come mainly from the industry which will be much more supportive of proposals that are less disruptive to them but which could cause major noise impacts for communities under flight-paths.

We are aware that a number of the issues we have raised in our comments may be considered to be outside the scope of this specific consultation. However, we are still raising these now as we do not consider that we were adequately consulted or informed at the earlier stages of policy development of the PPR process.

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7 Braes Mead, South Nutfield, Surrey RH1 4JR

7 July 2019

### Response to CAA Airspace Change Consultation – CAP 1786

Nutfield Conservation Society (NCS) is a voluntary group based in Nutfield Parish, Surrey.

NCS has a number of environmentally based interests. We operate via the above c/o address and can be contacted via email address

#### QUESTION 1

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

Don't know

We welcome the principle of introducing a process (PPR) for redistribution of air traffic through air traffic control operational procedure and recognise the complexity of organising (and reorganising) airspace.

We consider the introduction of PBN cannot be separated from airspace changes, no matter which agency is driving such a change. In principle we accept the advantages of Performance Based Navigation (PBN)

The introduction of PBN (at Gatwick) has led to the concentration of tracks and introduced overflying of communities not previously over flown. We are anxious to ensure that proposed changes should not result in overflying previously non overflowed communities.

#### QUESTION 2

*Do you have any comments on the way the CAA is interpreting the definition of relevant PPR*

Don't know

NCS does not have sufficient expertise to provide an informed response.

#### QUESTION 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

NCS does not have sufficient expertise to provide an informed response.

#### QUESTION 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 - Communities are stakeholders however the CAA and Air Traffic Agency give predominance to the aviation industry. NCS are disappointed there is no independent review system included.

#### QUESTION 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 (ie a binary choice)*

Don't know

NCS does not have sufficient expertise to provide a fully informed response. We consider that in principle the provision of multiple options may provide all stakeholders with a choice based on the potential effects of a change, rather than simply accept or oppose a change.

#### QUESTION 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 - We have already commented on the predominance given to the aviation industry and do not consider it appropriate that the agency sponsoring change conducts the review. At least the CAA should review the implementation with ideally an independent overview.

#### QUESTION 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 - NCS suggest a qualification that such a temporary PPR should be excluded from providing evidence for a permanent change.

#### QUESTION 8

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

No – other than to take full account of community concerns and adopt a flexible approach.

**Parish Councils Airport Association**  
**Response to: Airspace change: consultation on a decision-making process for PPR (planned and permanent redistribution of air traffic) proposals**

The Parish Councils Airport Association (PCAA) is a group of elected representatives from 21 parishes and one town which represent the local community interests with regard to Bristol Airport. We cover a large area with parishes from Sedgemoor district, Bath and North East Somerset district as well as North Somerset district. The parishes the association represents are Barrow Gurney, Blagdon, Brockley, Burrington, Butcombe, Churchill, Cleeve, Dundry, Kingston Seymour, Long Ashton, Winford, Wraxall and Failand, Wrington (**North Somerset**) Chew Magna, Compton Dando, Keynsham Town Council, Publow w Pensford, Stowey Sutton, Timsbury, Ubley (**BANES**) Cheddar, Shipham (**Sedgemoor**). The population within the Association equates to over 40,000 residents

In response to the above consultation we agree with the comments made by the Aviation Environment Federation.

We would particularly like to emphasise point 3 of the AEF response which states that the number of stakeholders potentially affected by a proposed PPR change will determine how extensive the consultation must be. Bristol Airport is situated in a rural location. The population surrounding the airport is relatively small and spread out and may be disadvantaged by not being included in a consultation. Despite this they could receive significant noise impacts.



**Airspace change: consultation on a decision-making process for PPR (planned and permanent redistribution of air traffic) proposals, CAP 1786.**

**The South East London campaign group Plane Hell Action responds here on 6<sup>th</sup> July 1029 to the above CAA consultation document.**

<https://consultations.caa.co.uk/policy-development/ppr-decision-making-process/>

**Plane Hell Action's General Observations:**

There is insufficient importance given to the communities affected by PPR despite them being listed first as 'who is affected by a relevant PPR' on page 27 of the proposals document. Instead, this consultation represents only the needs of the aviation industry and aviation decision makers with the rider of air safety and efficiency. The health and well-being of the people on the ground should be paramount when it comes to PPR: no communities should be picked out for suffering.

Although not used in this consultation, there must never be any reason to use phrases such as 'there will be winners and losers' or 'no one solution fits all'. These are harmful and disrespectful ideas and must never be used when talking about overflown communities.

It is not acceptable to set the clock on PPR to run forward from November 2019. Producing the consultation at this time, July 2019, is an admission of CAA failures to monitor flight path changes/adjustments made in recent years without consultation. i.e. the CAA has failed to follow due process and/or to monitor ANSP failure to follow due process. Clear changes have occurred in the arrival swathes for approaches into LHR, that have had the effect of narrowing base-leg routes into concentrated paths, affecting residents punitively. See the Plane Hell Action/HACAN report Corridors of Concentration. Through these arrivals changes, a failure to protect the overflown has occurred and this provides every reason to consider retrospectively that those 'relevant' and other PPRs that were stealthily introduced before November 2019 be reversed.

Paradoxically, bringing in the PPR process at this time, November 2019, can now be used to prevent the overflown doing anything about the recent punitive narrowing of these arrival routes, since the CAA are given authority over ATC procedures via a process that enables them to devise consultations which inevitably lead to the outcome preferred by the industry. There is now no time left in which the communities affected by recent narrowing of arrivals into concentrated paths can make any Statement of Need and provide model of their plight.

There are too many types of PPR, with only one type under consultation in this document. This allows ANSPs freedom to change flightpaths with CAA support for a 'no need for a consultation' approach.

If, as the Government trumpets, planes are getting 'quieter' (less noisy is a more honest description) there is no need to concentrate flight paths, which will be the main

scenario for PPR implementation, but there is instead every possibility to disperse paths, so that all stakeholders share the downside and all stakeholders share the upside.

The CAA and the PPR process must henceforth implement government advice published in the ANG 2017 where it states that the overall effect of noise must be reduced rather than the number of people affected. It is disappointing that the current actions by the CAA and of recent operational changes (since circa 2014) for arrivals to LHR have concentrated noise over less people, increasing the negative effects of noise onto the unfortunate selected communities and contradicting the ANG advice.

Heathrow data shows that the moving of the ILS join point by stealth in recent years, unofficially and further to the east (Heathrow westerly ops), has resulted in concentration of arrivals as planes head down the same base-legs towards a small set of join points. See the Plane Hell Action/HACAN document [Noise Relief](#).

This consultation proposals document aims to avoid any discussion of the Government's guidance to the CAA, despite the ANG17 being often referred to in the consultation proposals document, for example item 2.5 on page 23. Its importance must be mentioned in this response since it is from the ANG17 that duty of care to the overflown is directed.

Taken from ANG 2017 Page 18 - 20 noise implications

"In the airspace from the ground to below 4,000 feet the government's environmental priority is to limit and, where possible, reduce the total adverse effects on people"

3.5 For the purpose of assessing airspace changes, the government wishes the CAA to interpret this objective to mean that the total adverse effects on people as a result of aviation noise should be limited and, where possible, reduced, **rather than the absolute number of people in any particular noise contour**. Adverse effects are considered to be those related to health and quality of life.

3.20 This means there will be situations when multiple routes, that expose more people overall to noise but to a lesser extent, may be better from a noise perspective.

Taking account of consultation and the objectives of the airspace change proposal, with regard to assessing and comparing environmental impacts of a proposed change, preferred options should normally be based on those which result in fewer total adverse effects on people

The Air Navigation Guidance and Air Navigation Directions issued in October 2017 followed a [consultation](#) by the Department for Transport about airspace and noise policy. The Air Navigation Guidance, in addition to being statutory guidance to the CAA on environmental objectives in respect of its air navigation functions, also gives more information on the Secretary of State's role in the airspace change process

The Secretary of State must be satisfied that one of any three call-in criteria apply. These criteria are that the proposed change:

- is of strategic national importance,
- could have a significant impact (positive or negative) on economic growth of the United Kingdom, or

- could both lead to a change in noise distribution resulting in a 10,000 net increase in the number of people subjected to a noise level of at least 54 dB LAeq 16hr and have an identified adverse impact on health and quality of life.

The last of these criteria is based on the poor LAeq noise metric, that ignores frequency.

The use of an averaged noise measurement, LAeq, misrepresents the lived experience of low flying planes. The frequency of noise events and noise at low frequency is not accounted for in LAeq. Many residents of SE London experience 666 planes passing overhead every day below 4000 feet as they traverse base-leg routes towards the Heathrow ILS, at over 60 dB per plane. LAeq sums the sound pressure levels and divides by the number in the sum. Therefore, the LAeq will give the same value if there are 666 planes at 60 decibels and if there are 66 planes at 60 decibels.

It is a complete travesty to use any averaged-out metric to direct quality of life for people on the ground.

Also, establishing that the final criteria is satisfied will require improved/increased noise monitoring that is not currently developed/deployed as well as robust results from health research on the effects of noise/particulates on the overflow that has not yet been done. The Community Noise Group that co-chairs at the Heathrow Community Noise Forum has developed this fair and balanced noise objective that Plane Hell Action supports and that we propose is added as a further criterium to be satisfied by PPR triggers and processes:

*"Where there is a reduction in overall noise the benefit be distributed proportionately to those already most affected and where there is an increase in overall noise the disbenefit be distributed proportionately to those already least affected."*

The webTAG model that is quoted in the document needs revision. If it is to be used as a decision making tool for airspace changes such as those requested as part of a PPR process then the given webTAG model requires comprehensive updating in the light of the latest WHO recommendations, in terms of the suite of metrics to be applied and the levels of values attributable to impacts in monetisation assessments.

The current DEFRA webTAG model shows that PBN leads to additional health impacts compared to traditional navigation technology. This applies even at 2017 average dispersion levels, which were significantly more concentrated than in 2013, the NPS base year. It can be shown that splitting a single route into two – in other words noise sharing - delivers huge health benefits and therefore dispersion of low-flying aircraft is paramount when making changes through PPR.

### **Q1 What are your views on the CAA's proposed decision-making process**

Answer: Significant modifications needed

1. The name Planned Permanent Redistribution is inaccurate to a flawed or even fraudulent degree:

'Permanent' should be replaced with 'Published' because no such change should in fact be 'permanent' in the case where it causes harm to the health of the overflown. 'Redistribution' should be replaced with 'Repositioning' since the definition of redistribution is "the distribution of something in a different way, typically to achieve greater social equality". The current notion of 'PPR' that appears in this consultation will most definitely be used to do exactly the opposite - to narrow and concentrate paths and modify join points such that there will be greater noise on fewer people. Therefore the use of the term 'redistribution' is fallacious.

2. Changes to arrival routes into LHR and LCY have been operationally modified over the last 4-6 years. Join points for westerly operations into LHR have been moved further east resulting in concentrated base-leg patterns and greater noise for fewer people. These are historic PPRs that are not being accounted for in this consultation document. There must therefore be provision for a PPR, or within the PPR process, that allows a 'return' to patterns/operations of previous years. This provision is for residents who newly suffer debilitating noise as a result of operational changes that pre-date PPR and who were given no voice at the time of the changes. It is obscene that these residents should be trapped by the PPR process going forward without recourse to a prior situation.
3. Wording contained in the consultation document is too nebulous of  
  - p23 2.2 'environmental objectives' is too vague and must specifically call out problems of noise
  - p29 'anticipation-base' needs a detailed definition
  - p29 2.21 'any other additional relevant information' needs a detailed definition
  - p29 2.23 it is not acceptable that a PPR once implemented and then found to meet one of the 3 criteria should not have that PPR 'called in'.
4. It is right that an ANSP should not be the only body that decides on what operational changes are made, but how will the overflown be represented during the decision-making process referred to in item 1.11 of page 17? It has not been made clear at all how the plight of the overflown with respect to particulates emitted by aircraft that are consumed by the blood stream, or to noise of aircraft at low altitude that prevents sleep and causes physical decrepitude, will be modelled within the PPR decision-making process. A glance at the flawed WEBTag table is not sufficient for this duty of care.
5. Item 1.16 on page 18 uses the expression 'in certain ways'. What on earth does that mean exactly?
6. Item 1.17 on page 19 makes much of the fact that increased noise effects could result from unchecked operational changes. This use of noise at this point is iniquitous as it is being used to validate the existence of a PPR process, while at the same time the balanced proportionate distribution of noise is not sufficiently represented within the decision-making procedure. How are the overflown and those affected from the collateral damage of operational changes supposed to be able to trigger PPRs themselves, something they will need to do when and unfair balance of noise is put over their heads.



7. Item 2.2 on page 22 refers to 'any guidance on environmental objectives'. This is a skimming over of the true issues that low-level overflight creates for people on the ground. There are issues of particulates, carbon monoxide, dirt and soot along with issues of noise. The human brain requires cleansing of toxic proteins through sleep to avert the onset of dementia: low flying planes at unsociable hours late at night or early in the morning cause sleep loss.
8. Item 2.6 on page 24 refers to the 'important role which local communities have'. This seems very disingenuous since communities are totally abused by being overflowed at low altitude. An example is the PBN route over SE London approved at a PIR stage by the CAA and that inflicts tortuous levels of noise on selected communities. These communities are totally unable to get any review of this PBN route so the 'important role' that those communities play is to be disempowered!

**Q2 Do you have any comments on the way the CAA is interpreting the definition of a 'relevant PPR'?**

Answer:

1. For the general public, the notion of 'relevant' PPR will be confusing.
2. The term Planned Permanent Redistribution is open to misinterpretation or misunderstanding. For the public in fact, using words like 'Permanent' are alarming. As said in our answer to Question 1, the term 'Redistribution' is a misnomer. The process would be better understood and less fallacious if called 'Planned Published Repositioning'. The term 'relevant' would be better understood by using a word like 'validated'. After all, a PPR is a PPR – it affects the overflowed in some way and there is no way that one can be more 'relevant' than another when it comes to low-flying planes accruing overhead.
3. In criteria 1 for relevance, item 2.13 page 26, , the 'specified' distance should be clarified. The contents of the Annex that refers to the tolerance either side of the track at distance delta to runway threshold should be included next to this item.
4. We are concerned that the proposed system of PPR versus 'relevant PPR' allows ANSP/CAA to give the easy answer 'nothing has changed' when challenged by the overflowed about increases in plane noise. A PPR that is not relevant will facilitate this answer by:
  - a. constricting flights in an ever-narrower lateral swathe without moving the actual flight path, thereby avoiding public consultation i.e. communities are gagged from saying 'these planes are too concentrated, please spread them' or
  - b. adjusting where planes join into the ILS without moving the specified join point itself.
5. We are concerned that the system of 'relevant' versus 'not relevant' PPR allows an ANSP to make a change overnight without consultation.
6. We are concerned that when communities challenge the effects of an implemented PPR or 'relevant PPR' by proposing an alternative solution/pattern they will be told

'this will require a consultation process' – a requirement that is, ironically, designed to deter communities from seeking a return to previous operations that spread noise more fairly and proportionately. It is crucial to note here that our items 4(a) and 4(b) above have already occurred for arrivals into LHR during westerly operations, as noted earlier, and that the PPR process is now being put in place to prevent residents seeking a return to the previous and less punitive arrival procedures. Hence, Plane Hell Action proposes that item 2 of our answer to Question 1 is added to the identification of 'relevant' PPR and furthermore, that a return to a previous pattern is NOT considered to be 'relevant'.

7. Item 2.16 on page 27 lists communities as the first to be affected by a relevant PPR. Since they are first in this list the PPR process must provide a means for communities to create a statement of need for 'reversal' of implemented PPRs that damage well-being and quality of life. This consultation document does not provide for this essential requirement.
8. Item 2.20 on page 29 is worrying since it implies that there are PPRs in the pipeline and that their implementation will result in punitive increases in noise/pollution for those who are already overflowed. This item needs to provide for review of PPR changes that have resulted in concentrations of planes on fewer people and for consideration of their reversal. Such a review has been done at Gatwick where the ILS join point and the positions at which planes were joining were resulting in increased noise for fewer people.
9. Item 2.23 is very worrying since it says that although a PPR was exercised prior to November 2019, it will not be reviewed, regardless of the distress that it causes to the communities it affects. This item should be removed.
10. Item 3.8 on page 45/46 refers to 'environmental factors' and 'significant impact'. This loose language that avoids specifying what are crucial impacts on communities is intolerable. Please increase the accuracy of such statements.
11. Item 3.15 on page 48 refers to consultations. Consultations from LHR and LCY have so far been flawed. There have been dishonest diagrams that misplace plane tracks and limited/contrived questions that are designed to give the answers wanted by the ANSP.

**Q3 Do you agree that the 'trigger' process is the most appropriate way for ANSP to identify when to follow PPR process?**

Answer: No

It is obvious that something must be the initiator for a PPR such as a trigger. However, by embedding the trigger definition within the control of the ANSP we are concerned that:

1. Communities are not empowered with the right to trigger a PPR process? Surely, a request for change cannot only be raised by an ANSP, since that would result in a dictatorship presided over by the aviation sector to satiate their own financial gains.

2. The trigger must include how to ensure duty of care for those who are already overflowed. Proper and pukka modelling would ensure that the ill-effects of aviation are spread across the population in a fair and balanced way.
3. Item 4.9 on page 52 refers to 'modelling the anticipated geometric change'. If a community group wishes to create a Statement of Need for an operational change, then how are they expected to 'model' existing and new tracks? What tools and data can they access for doing this?
4. The decision diagram in item 4.10 on page 52/53 must include a proviso for an equal and fair distribution of noise/pollution just as safety obligations are already included. This proviso will comprise the noise objectives of the ANG17 and the new objective proposed by the Community Noise Group:

*"Where there is a reduction in overall noise the benefit be distributed proportionately to those already most affected and where there is an increase in overall noise the disbenefit be distributed proportionately to those already least affected."*

**Q4 Are there any aspects of CAP1616 that are missing from proposed PPR process?**

This is unanswered as it is beyond the expertise of a small campaign group. This is not to be interpreted under any of the given options of 'Yes, something more is needed'; 'No'; 'Don't know'

**Q5 Where a PPR is proposed, can multiple workable options be developed?**

Type 1: lateral shift

Type 2: departures

Type 3: change in ILS

Answer: Yes

Type 2: Departures currently have little effect on SE London unless departure heights over SE London will reduce to below stated 10,000ft.

Type 1: Operational procedures that maintain a distribution of noise across the full swathe must be designed (vectoring, coding).

Type 3: Operation procedures that use the full stretch of join point must be designed to counteract the tendency to 'bunch' joins into a few points thereby concentrating paths and increasing noise that harms the health of the overflowed.

**Q6 Do you agree with CAA proposal that the ANSP should produce the PIR rather than the CAA?**

Answer: No, something more is needed

1. No single stakeholder such as the ANSP, or the CAA or the communities should singly produce the PIR.

2. An objective organisation such as AEF (Aviation Environment Federation) should be involved and even co-ordinate, drawing input from other stakeholders, particularly to ensure that balance of noise and pollution across communities has been achieved: a balance that will lessen the overall negative impact on the health and quality of life of those overflown at low altitude.

**Q7 Do you agree a scaled process for a temporary 'relevant PPR' lasting no more than 6 months**

Answer: No. For those overflown at low altitude, the changes that come about through PPRs, relevant PPRs or temporary PPRs are going to be a nightmare. There will be continual uncertainty, questioning, badly formed consultations and the destruction of quality of life by the creation of noise ghettos and lack of accountability and responsibility.

**Q8 Is there anything specific that the CAA can do to aid the implementation of proposed PPR decision-making process?**

Answer: Yes

1. Identify and expose a system of 'Accountability' for changes in overhead flight patterns. Communities must know who they can approach. They are currently rudderless, with no organization taking responsibility for distressing effects of increased noise. This is required within this PPR process.
3. Address the lack of consultation of 'historic' PPRs.
4. Provide a system for reverting to earlier flightpath patterns where implemented PPRs cause distress to the overflown.
5. Change the name Planned Permanent Redistribution to Planned Publishee Repositioning.
6. Change 'relevant' to 'validated'.

**AIRSPACE CHANGE: CONSULTATION ON A DECISION-MAKING PROCESS FOR  
PPR (PLANNED AND PERMANENT REDISTRIBUTION OF AIR TRAFFIC)  
PROPOSALS**

Response from Richmond Heathrow Campaign  
7 July 2019

**INTRODUCTION**

1. This is a written response of the Richmond Heathrow Campaign (RHC) to the CAA's consultation titled '*Airspace change: consultation on a decision-making process for PPR (planned and permanent redistribution of air traffic) proposals CAP 1786 May 2019*'.
2. We understand the PPR proposals are designed to plug a gap in the management of airspace. *"The Government recognised that whereas changes to airspace design are subject to the airspace change process and are consulted on with relevant stakeholders, changes to air traffic control operational procedures could be implemented without consultation, even where the noise impacts are similar to those of a change in airspace design. In other words, because changes to air traffic control operational procedures alone formed part of an existing, unchanged airspace design, they did not fall within scope of the airspace change process."*
2. RHC represents three amenity groups in the London Borough of Richmond upon Thames: The Richmond Society, The Friends of Richmond Green, and the Kew Society, which together have over 2000 members. The members of our amenity groups are adversely affected by noise from Heathrow Airport's flight paths, poor air quality and road and rail congestion in west London. We acknowledge Heathrow's contribution to the UK economy and seek constructive engagement in pursuit of a better Heathrow. We are an active participant in the Heathrow Community Noise Forum.
3. Our premise is that it would be preferable to aim for a better Heathrow rather than bigger Heathrow and to capitalise on the world beating advantage of London's five airports, in particular by improving surface accessibility to all five airports, which would be a major benefit to users. Our approach is to continue supporting the case for no new runways in the UK and we believe this is well supported by the evidence produced by the Airports Commission and the DfT in relation to the Airports National Policy Statement.
4. Over recent years we have undertaken extensive research on Heathrow and submitted a large number of papers to the Airports Commission, the DfT, CAA and others - all of which can be found at [www.richmondheathrowcampaign.org](http://www.richmondheathrowcampaign.org)
5. We have focussed our attention on Heathrow in this response but we see no reason why the comments made should not apply generally to other airports across the UK. But also, Heathrow will be by far the largest UK airport with the NWR expansion and therefore potentially it could be where the PPR process has its largest impact.

## RICHMOND HEATHROW CAMPAIGN RESPONSE

### GENERAL OBSERVATIONS

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

About Right	Minor Modifications Needed	Significant Modifications Needed	Don't Know
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#### **RHC Answer: Significant Modifications Needed**

1. In principle, RHC supports Relevant PPRs being decided by the CAA in a process similar to the Airspace Change Process (ACP), which the CAA proposes in this consultation. However, we have significant reservations.
2. We have raised concerns with the CAA about the ACP in regard to Heathrow's 3<sup>rd</sup> runway and IPA proposals and potentially the same deficiencies arise with the PPR process:
  - a. 'Need' is not consulted on but should be.
  - b. The ACP for Heathrow's 3<sup>rd</sup> runway has so far failed in its engagement with communities and specifically with regard to the Gunning Principles on engagement.
  - c. RHC has previously proposed that the 7,000 feet limit in the definition of Level 1 scaling in the ACP should be amended to 10,000 feet and that when applying the altitude test to the airspace change process noise should be the priority up to 10,000 feet and not compromised with carbon between 4,000 and 7,000 feet. Altitude based design principles are part of the airspace change process. The Government's Air Navigation Guidance states 'noise is the priority below 4,000 feet whereas noise and carbon should be balanced priorities between 4,000 and 7,000 feet. Above 7,000 feet noise is no longer a priority.'
  - d. It is essential the Do-minimum case be taken forward to the final decision and not prematurely discarded, and that it be carefully defined so as to avoid the Do-something options taking benefit for outcomes that would arise in any event. Where there are multiple changes over time it is not clear what would be the Do-Minimum. The ACP is ambiguous on this point.
  - e. It is essential decisions are not based only on incremental values (i.e. option less Base case) but also considers absolute values in order to avoid distorted assessment of the options and risk. The ACP is not clear on this point.
  - f. Uncertainty and risk are barely mentioned; it is essential they be accounted for.
  - g. WHO Guideline should be used to evaluate the options. We realise the CAA may rule this as outwith the consultation since it involves policy but we argue that is involves evidence and should be taken into account.
3. Relevant PPR's only relate to Air Traffic Controller changes and exclude changes to commercial traffic volumes, destinations and types of aircraft. We realise this distinction is deliberate but we believe there is still a major gap in the management of airspace and its noise impact.

4. Communities are very sensitive to the allocation of noise and the PPR process applies no noise objective and in turn no principles to achieve a fair and rational allocation of noise impact. We believe that where operational changes are made, priority should be given to minimising the noise impact on those already most affected. This process deficiency continues all the way through to the webTAG monetisation, which is based on net change (i.e. a netting off of benefits and dis-benefits) and on minimising the Total impact rather than minimising the Average per Household impact. This all means there is an inherent bias in the process that favours concentration rather than dispersion of noise impact. The Air Navigation Guidance allows both and the matter is not necessarily one of policy, which the CAA says the consultation is not about; the allocation of noise impact and the issue of concentration versus dispersion should be a key ingredient of the PPR process.
5. In our view communities should have only one party to deal with on operational issues and that should be the airport. Usually it will be the airport that proposes ACPs and not the air navigation service provider (ANSP). The airport is responsible for managing environmental issues and related airspace design and use; the airport is required to use the Balanced Approach and Noise Action Plans for managing noise. To introduce the ANSP into the process divides responsibilities and management of airspace and noise and it multiplies communication channels with communities. Many of the noise issues are inter-related, especially on a cumulative basis and also in relation to shared airspace between multiple airports. The airport should have overall responsibility for the complex arrangements. Airports work with the ANSP in airspace design and operations and the ANSP has an important role in these matters and a unique role in Air Traffic Control but these are not sufficient reasons to exclude the airport in the PPR process. Furthermore, the ANSP usually does not have the skills and experience of engaging with communities. There are often issues of trust and confidence with airports but ANSP is largely an unknown quantity for communities. RHC's view is that the airport and not the ANSP should be the proposer in the PPR process.
6. The proposed PPR process relies on the ANSP monitoring air traffic control changes and deciding whether a change is a relevant PPR. As far as we can see, neither the CAA nor anyone else has the power to audit this process or require the ANSP to make a proposal, retrospective or otherwise. It is beholden on the airport to know what is going on in its airspace, although there have been notable lapses in recent years at Heathrow where the ANSP allegedly made changes without Heathrow being aware. In our view this is another reason why the airport should be made responsible for the PPR process, and it is up to the airport and ANSP to work out together how best to identify and decide on PPR changes.
7. We would like the CAA to be clearer as to how the PPR and ACP processes might inter-relate in the case of Heathrow's expansion and airspace modernisation. Major ACP proposals are currently underway. Almost certainly they will involve changes to air traffic control procedures - for example, PBN and IPA, where new joining points on arrivals are being planned. The existing airspace will be changed by IPA introduction before first flight from a 3<sup>rd</sup> runway in say 2026 and then by the 3R in 2026. An additional 25,000 flights, being sought by Heathrow before 2026, may involve both the ACP and PPR process. Does this mean that PPR changes before 2026 will be considered as such unless they are subsumed into the IPA or other ACP changes and after 2026 unless they have been subsumed into the 3R ACP? The decision tree in Figure 2.1 of the consultation is not clear in assuming that an ACP and PPR are mutually exclusive. We are concerned changes could be sought through the less rigorous PPR process when in fact they should be dealt with by the ACP.

8. **Joining Point Rules.** The Airport's AIP (Aeronautical Information Publication) states that the minimum height at which aircraft can join the ILS during the day (between 6am and 11pm) is 2,500ft which is approximately 7.5 nautical miles (around 8.5 miles) from Heathrow. At night (between 11pm and 6am) an aircraft must be no lower than 3,000ft which is approximately 10 nautical miles (around 11.5 miles) from Heathrow. Because of the IPA joining point being near Heathrow than existing, the additional IPA flight paths will not satisfy these rules. No case has been made to revise the rules. It is not clear whether the assessment is part of the ACP or PPR process. We believe it should be one or other because the rules affect the noise impact. It is not clear whether this is an ACP or PPR issue.
9. RHC believes ICCAN's views on the PPR should be taken into account before the PPR process is formalised in November 2019.
10. We have concerns with the proposed triggers and these are dealt with in our response to Question 2.

## **IDENTIFYING A 'RELEVANT PPR'**

**Question 2 (optional): Do you have any comments on the way the CAA is interpreting the definition of a 'relevant PPR'?**

### **RHC Answer:**

11. Our understanding is that three operational triggers are proposed and also a trigger concerning an airport's classification. We have no concerns with the classification trigger. The operational triggers are:
  1. Lateral shift in flight track of more than a specified distance,
  2. Redistribution between Standard Instrument Departure routes,
  3. Change to Instrument Landing System joining point (on approach).

### Lateral shift in flight track (Arrivals and Departures)

12. *"A PPR which is (or more than one PPR within 24 months whose cumulative effects are) anticipated to result in a lateral shift of aircraft from the pre-existing nominal centre line of the density of flight tracks of at least the horizontal distance shown in the second column of the table below, at the heights shown in the first column of that table"*
13. Para 2.29 sets out the criteria in a table for a relevant PPR in terms of height and distance from a centre line. For example, at 3,000 feet if a new track is more than 800m from the centre line then it is defined as a relevant PPR. In effect this is dispersion and is likely to lead to a webTAG cost if measured in terms of net Total monetised values or potentially a benefit in terms of Average per Household impact. It is not clear how this anomaly will be dealt with.
14. PBN is being introduced. Potentially this concentrates otherwise dispersed flight paths. It is not clear whether PBN makes the lateral shift trigger largely redundant. But also should not the trigger also apply in reverse when dispersed flight paths are concentrated? As explained in para. 12 above this may reduce the webTAG Total value but increase the Average per Household value. It is not clear how this anomaly will be dealt with.



15. Seemingly, the trigger applies whenever there is a breach of the lateral criteria but this may arise over a short segment of the track or over a longer segment. Should this not be taken into account in determining materiality?

Redistribution between SIDs (Departures)

16. Defined as “A PPR which is anticipated to increase air transport movements using a Standard Instrument Departure (SID) by at least 5000 movements per year as a result of a decision by an airport and/or its ANSP [air navigation service provider] to redistribute air traffic from one SID to another at that airport.”
17. On average 5,000 per year works out at 14 per day. But this is an average and if the additional movements are concentrated in time for example according to mode (easterly/westerly) or time of day then the impact could be very severe. RHC suggests there should also be an hourly criteria in the day time. There probably needs to be separate hourly criteria for the night and separate criteria for the two night shoulder periods.

Change to Instrument Landing System joining point (on approach)

18. We have raised issues about the introduction of curved flight paths and joining points above in paras 7 and 8 in connection with IPA. We assume, given the Airports Commission’s indicative flight paths with a 3<sup>rd</sup> runway, that many of the flight paths in future will be curved into various joining points. Whether all this is taken through the ACP and how air traffic control changes will be made needs clarification.

**Question 3 (optional): 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?**

Yes	No Don’t Know
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Please explain your answer, and whether any specific guidance from the CAA would help.

**RHC Answer: Yes. We have raised reservations and questions in our response to questions 1 and 2.**

**PROPOSED PPR DECISION-MAKING PROCESS**

**Question 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	No	Don’t Know
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If you answered yes, please say what they are and why.

**RHC Answer: Yes. We have raised issues with regard to the CAP 1616 and questions in our response to questions 1 and 2.**

**Question 5 (optional):** 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.

Type 1	Multiple	Binary	Don't Know
Type 2	Multiple	Binary	Don't Know
Type 3	Multiple	Binary	Don't Know

**RHC Answer:** All types - Multiple

Please provide any additional comments.

**Question 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?

Yes	No, something more is needed	Don't know
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**RHC Answer:** See para 5 of our response. We propose the airport should undertake the post-implementation report but in conjunction with the ANSP.

Please provide any additional comments.

#### TEMPORARY CHANGES

**Question 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	No	Don't Know
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**RHC Answer:** Yes

Please provide any additional comments.

#### IMPLEMENTING THE NEW PROCESS

**Question 8 (optional):** Is there anything specific that the CAA can do to aid the implementation of our proposed PPR decision-making process?

**RHC Answer:** We have set out above an number of actions we believe the CAA should undertake.

END

## ***Salfords and Sidlow Parish Council***

The Village Hall  
5 Honeycrock Lane  
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Redhill, Surrey  
RH1 5DG

By e-mail at: [airspace.policy@caa.co.uk](mailto:airspace.policy@caa.co.uk)

The CAA  
CAA House  
45-59 Kingsway  
London  
WC2B 6TE

4 July 2019

Dear Sirs

**Re: CAA consultation on a decision-making process for PPR (planned and permanent redistribution of air traffic) proposals**

I am writing to you on behalf of Salfords and Sidlow Parish Council.

**1. Overall, what are your views on the CAA proposed PPR decision making process?**

Don't know - 1.21 shows only relevant PPRs must go through the CAA's proposed decision-making process but it is not clear if this consultation is only about relevant PPRs (see Q8 below). Any change which is likely to have a significant adverse effect on people on the ground should require consultation.

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

Type-1 - The proposed lateral shifts in flight track as shown in the table in paragraph 2.29 is too great. SSPC is only affected by Take-offs from Gatwick Airport and is not affected by landing aircraft. This means SSPC is affected by lateral shifts in flight tracks and has been noticeably affected by the change from SIDs to RNAV. This change led to a lateral shift from closer to the northern part of the Route 4 NPR to its centre line. The shift is in the region of 1000m with the vast majority of aircraft above 4000ft but the change in noise nuisance for our residents is substantial. Most of the people living near the centre line, ie who were not overflown, did not complain about the aircraft noise but following the shift there are very many people who tell us they are now badly affected by the aircraft noise. Likewise people who were overflown now say they are relieved by the shift and do not want it changed back. This shows the proposed shift of more than 1100m at 4000ft to be recognised as a Type-1 PPR is too big, the lateral shifts in the table in paragraph 2.29 should be reduced by 50% for the given heights.

The shift should be from the pre-existing track/s not from the pre-existing nominal centreline.

**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 '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?**

The box in table 4.1 reading "ANSP has no reason to believe proposed change is a PPR" should read "ANSP can show the proposed change is a not a PPR".

**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?**

Throughout the consultation document there are several references to "Noise Pollution". We believe that the process should also include consideration to Air Quality, especially when considering additional air traffic and the resultant road traffic. Given the current significance of Climate Change, consideration to the impact of increased carbon emissions from air space changes should also be included.

The documentation suggests that it is the Air Navigation Service that decides whether a PPR is relevant or not. We disagree with this. As the Air navigation Service has a vested interest in deciding that a PPR is not relevant, the decision should be made by the CAA. In essence the Air Navigation Service should supply a report with supporting evidence that, they believe the PPR to be relevant or not. The CAA will then consider this evidence, and any other associated information, to make the decision relating to relevance. When making the decision the CAA, in the absence of significant evidence of non-relevance, should consider the case as relevant for the purposes of consultation.

**5. Where a PPR is proposed, can multiple workable options be developed for the change in air traffic control operations procedure, or are the only options either to do the PPR or to do nothing (i.e. a binary choice)?**

Where a PPR is proposed it is vital that all of the effects of a PPR are demonstrated and understood. Multiple PPR options must not be allowed unless all of the effects of each PPR can be demonstrated and understood.

**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?**

Nowhere in CAP 1768 does it say who is responsible for predicting the impacts or benefits. It should be acceptable for the air navigation service provider to produce a post-implementation report as to whether the change has had the impacts and benefits predicted provided they have been properly identified, but if there is any doubt this should be subject to confirmation by the CAA.

**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?**

Provided the total duration of a temporary relevant PPR in no more than six months and reversion to the original tracks is all completed within the immediately following three months we agree, otherwise we do not agree.

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

The CAA must recognise its consultations are for the layman as much as the professionals. CAA 1768 is not written in a way which is readily understood by the layman and, quite possibly, some

professionals. The thrust of this document can and should be presented in no more than 10 pages with the background and detail as annexes. It is repetitive, the questions are given twice, Section 70 of the Transport Act 2000 is referred to 11 times. It is not explicit whether the consultation is on PPR or relevant PPR although the distinction is fundamental, paragraph 4 says "Only PPRs that meet certain criteria will need to go through this approval process. These are known as 'relevant PPRs'," paragraph 9 says it is both. Paragraph 2 says "whereas changes to airspace design are subject to the airspace change process and are consulted on with relevant stakeholders, changes to air traffic control operational procedures could be implemented without consultation, . . .", elsewhere the word "approval" is used. We could go on.

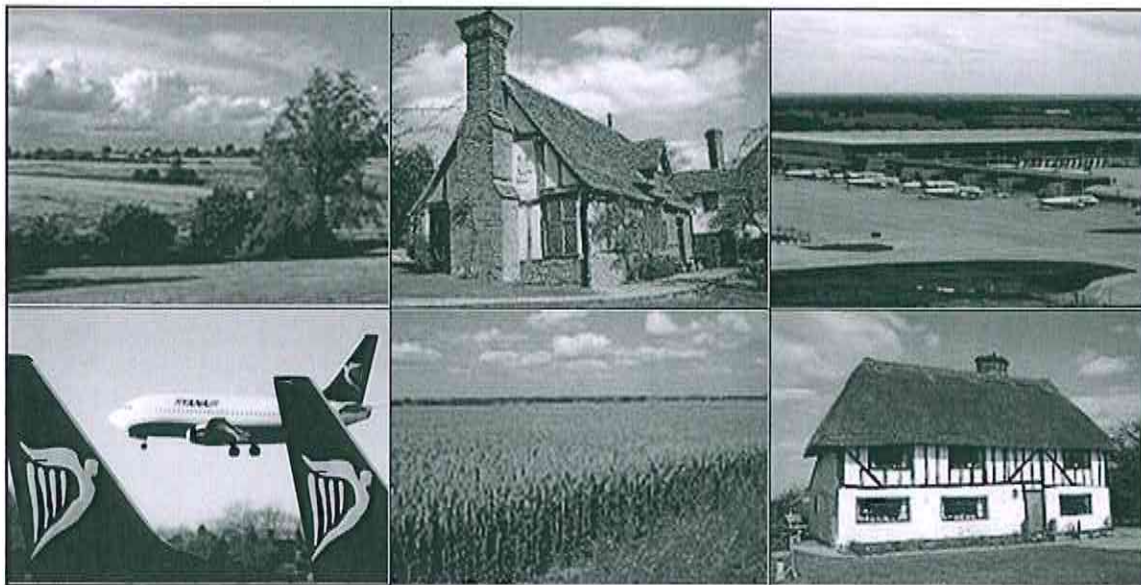
Yours faithfully

Claire Minter  
Clerk to Salfords and Sidlow Parish Council

Cc: Crispin Blunt MP



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## **Response to CAA Consultation on a decision-making process for PPR (Planned and Permanent Redistribution of air traffic) proposals**

Stop Stansted Expansion ('SSE') was established in 2002 in response to Government proposals for major expansion at Stansted Airport. We have some 7,500 members and registered online supporters including 150 parish and town councils and local residents' groups and national and local environmental organisations. Our objective is to contain the development of Stansted Airport within tight limits that are truly sustainable and, in this way, to protect the quality of life of residents over wide areas of Cambridgeshire, Essex, Hertfordshire and Suffolk, to preserve our heritage and to protect the natural environment.

## 1. Introduction

1.1 This document is the response from Stop Stansted Expansion ('SSE') to the Civil Aviation Authority ('CAA') consultation '*Airspace change: consultation on a decision-making process for PPR (planned and permanent redistribution of air traffic) proposals*'. An introduction to SSE is included on the front page of this response.

1.2 SSE welcomes improved airspace planning which reduces the environmental harms and adverse health impacts for people living around airports and under flight paths and increases the airspace efficiency for users. SSE has long maintained that there needs to be better coordination between land planning and airspace planning and that the long term stability of routes is an important airspace planning criterion. People and communities make important long-term decisions based on location. Changes to flight paths or frequency of overflying can have a significant impact on the quality of life and property values of those overflown. PPR changes must consider and respect this.

## 2. Response

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

2.1 SSE agrees in principle with the proposed PPR decision-making process subject to the following qualifications and modifications.

2.2 The definition in the Summary para 4 that "*Only an air navigation service provider can propose a relevant PPR*" is agreed. However, in 2009, in order to mitigate increased noise impacts at villages close to the airport following a change of Noise Abatement Departure Procedure, Stansted Airport Limited together with local communities instigated a programme of analysis and trials. This subsequently resulted in the implementation of replicated Standard Instrument Departure ('SID') routes using RNP1 (RF) which avoided direct overflying of village centres. Where an improvement of the noise climate is instigated by local communities living around airports and under flight paths in similar circumstances, this should be taken forward within this definition. This is clearly the case as illustrated by the example in para 1.5 of the proposed PPR process where it states "*to mitigate the effects of aircraft noise or other environmental impacts*"

2.3 We are concerned with the definition given in para 2.23 of the proposed PPR process where a change is implemented by an air navigation service provider without the need for a CAA PPR decision and then subsequently is found to have met one or more of the PPR criteria. In such circumstances there does not appear to be sufficient assurance for affected local communities to ensure that adverse environmental outcomes are effectively mitigated. The proposed process appears to rely totally upon air navigation service providers bringing forward a PPR change and there are no sanctions if they fail to do so and the outcome is subsequently found to meet the PPR criteria. There should be a further mechanism other than just informing the Department for Transport ('DfT'). The CAA should be able to carry out a form of CAP 1616 post-implementation review with the air navigation service provider. This mirrors the situation allowed for in CAP 1616 where a proposed airspace change, once implemented, is reversible if it does not achieve the objectives it is designed to achieve<sup>1</sup>.

2.4 It is not clear what weight is given to the air navigation service provider's need for a PPR and what weight is given to resulting adverse environmental harms for communities affected. As para 4.11 of the proposed PPR process succinctly points out, an air navigation service provider "*will be more used to considering only the operational implications of the change*".

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<sup>1</sup> CAP 1616, para 151.



2.5 There should be an equitable balance between operational benefits and adverse environmental impacts and the criteria for this should be clearly stated. This was not the case in the LAMP1A proposal for the airspace change proposal of a switch of traffic between the SID routes at Stansted Airport. This switch of traffic at Stansted would now be classified as a Type 1 PPR. At no time did NATS, the sponsor for the Stansted LAMP1A proposal, ever publish weighting criteria for the claimed benefits of the reduction of delays and CO<sub>2</sub> compared with the impacts on the number of people overflowed. Furthermore at no time did NATS respond to SSE's mitigation proposals for respite and alternative routes to reduce the noise impacts. These mitigation proposals were clearly set out in SSE's post-implementation review submission<sup>2</sup>.

2.6 The proposed process does not appear to include the criteria for a PPR to reduce the overall noise climate. Additionally cumulative noise impacts for communities overflowed by aircraft from more than one airport do not appear to be taken into account. Both these omissions should be rectified.

2.7 It is important that PPR options are clearly stated together with an option analysis including reasons why any options have been discarded. This was not the case in the NATS LAMP1A proposal which contained only one option.

2.8 Early engagement with local communities should be a routine requirement.

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

2.9 We agree with CAA's definition.

**Question 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?**

2.10 Yes.

**Question 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?**

2.11 Yes. See our comments in paras 2.2 to 2.8 above. Furthermore, air navigation service providers should be required to consult on the Statement of Need in Stage 1 of the proposed process.

**Question 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.**

2.12 The answer will depend on the particular circumstances but, as a general principle, multiple options should be developed wherever possible for all three types of relevant PPRs.

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<sup>2</sup> SSE submission to NATS: LAMP1A Module A, post implementation review May 2017

**Question 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?**

2.13 No. See our comments in para 2.5 above. NATS produced the post-implementation report for LAMP1A change at Stansted without any explanation of the quantitative impacts in terms of reduction of delays or of the comparative weighting criteria used to arrive at an equitable balance against environmental impacts. Furthermore, SSE's mitigation proposals contained in its post-implementation review submission<sup>3</sup> and local community concerns expressed in correspondence with NATS, CAA and DfT were ignored. This led to considerable distrust between local communities and these authorities. The air navigation service provider, as the sponsor, is not an independent organisation and should not produce the post-implementation report. The task should be undertaken by the CAA with the full involvement of the Independent Commission on Civil Aviation Noise.

**Question 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?**

2.14 Yes.

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

2.15 It may be that a Type 3 change to the joining point, depending on local circumstances, could be implemented if it were only proposed in the day or at night rather than for 24 hours. This might give more flexibility in reducing noise impacts or providing respite.

*Stop Stansted Expansion  
7 July 2019*

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<sup>3</sup> Ibid.