

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

**Responses submitted by email in addition to an on-line response  
(where permission has been given for publication)**

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

Duplicate email and on-line responses

British Airways

Royal Borough of Windsor and Maidenhead

Supplementary to an on-line response

Lee Munden



**BRITISH AIRWAYS RESPONSE TO CAA CONSULTATION – CAP1786  
DECISION-MAKING PROCESS FOR PLANNED & PERMANENT REDISTRIBUTION PROPOSALS**

**INTRODUCTION**

1. British Airways (BA) is pleased to submit comments in response to the CAA consultation on a decision-making process for planned and permanent redistribution of air traffic (PPR) proposals. BA is the largest airline operating at Heathrow and London City, with a significant presence at Gatwick as well. In 2018, BA's parent company IAG, which also includes Aer Lingus, Iberia, Vueling and Level, carried over 113 million customers in 573 aircraft to 280 worldwide destinations.
2. BA recognises the impact that air traffic control procedural changes for departing and arriving flights might have on local communities. We continue to work hard with NATS, airports and the CAA to reduce noise and emissions and minimise the impact of our operations and any changes to the distribution of aircraft. We support Government policy objectives of achieving the best possible overall outcome on noise, air quality, capacity, safety and environmental performance. The PPR framework and decision-making process should support these objectives.

**GENERAL OBSERVATIONS**

3. On balance the CAA proposed PPR decision-making process seems reasonable. However, BA is conscious that the CAP1616 process is complex and drawn out and therefore, we do have concerns that even a watered down version of CAP1616 could become overly onerous for many 'relevant PPR' proposals. This could unnecessarily delay or even discourage sponsors from bringing about changes and balanced decisions that generate benefits in the overall public interest.
4. The process must be proportionate and scalable to accommodate all types of PPR proposals (not only temporary changes). Where proposals can deliver consumer and local community benefits, they should be progressed at the earliest opportunity. We would not want the process to needlessly hold up changes that:
  - a. Optimise network performance and minimise the need for unnecessarily long flight tracks and fuel burn and therefore meet the environmental goal of reducing carbon emissions and sustained noise over large populations.
  - b. Optimise use of airspace capacity and create the airspace efficiencies and resilience needed to cope with current and short term anticipated growth in air traffic.
  - c. Unlock use of navigational technology and technical programmes that deliver benefits.
5. Ideally, the process should also interface with and not hamper broader UK airspace change programmes and the Airspace Modernisation Strategy, including the interaction with upper airspace or airspace changes above 7,000ft.
6. In order for changes to be made leadership is needed from the CAA (with support from Government) in articulating the process and objectives, and also sponsors' responsibilities. BA has some concerns over whether the CAA has sufficient resources in place to deliver both the CAP1616 and the PPR decision-making processes to a defined timetable, such that wider airspace policy aims are delivered, and benefits gained for consumers, airlines and communities.

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

7. One area of contention is the fact that only air navigation service providers (ANSP) can sponsor a 'relevant PPR' proposal. We would envisage that airports may also identify a need to progress a PPR proposal and yet the proposed process implies that they would be excluded from doing so without contracting an ANSP to take it up on their behalf.
8. BA is supportive of the CAA allowing ANSPs to develop their own 'trigger' process for identifying where a proposed change in air traffic control operational procedure is a 'relevant PPR'. We would only point out that care is needed to ensure that 'trigger' processes are consistently structured and applied.

#### **PROPOSED PPR DECISION-MAKING PROCESS**

9. BA is concerned that whilst community engagement can and should be improved for PPR proposals, this should not impose a consultation and regulatory process that is excessively burdensome on changes to operational working practices designed to effectively manage UK airspace on a day-to-day basis, such as vectoring within airspace.
10. We would not want to see a prolonged process where the community default is to push back on every initiative, even if it benefits them. The process needs to provide enough transparency such that commitments are not legally challenged post implementation.
11. All in all, more clarity is required to establish to what extent full consultation is required, e.g. a standard 12-week consultation period for PPR proposals seems extreme. The process should also acknowledge that there should be a level of permitted use of airspace structures within the tolerances that they were designed with or within thresholds based on the number of movements for Types 1, 2 and 3.
12. BA agrees that it should be the ANSP (or other sponsor – see Paragraph 7) who should produce a post-implementation report rather than the CAA.

#### **TEMPORARY CHANGES**

13. BA supports the need for scaled and extendable procedure for temporary proposals lasting no more than six months however, as mentioned above, the process must also be proportionate and scalable to accommodate all types of PPR proposals. A better definition of the scalable solution is needed to ensure that the time required to approve a change does not exceed the time period allotted for a temporary change.
14. BA recommends that trials to air traffic operational procedures only, i.e. where there is no change to the notified airspace design, should fall under the proposed PPR decision-making process rather than the full CAP1616 process.
15. Incorporating the scope to implement Temporary Operating Instructions for urgent national security or safety-critical changes is wholly supported. We would also include the need to handle prolonged disruptive events and the accommodation of special events within this category.

**END**



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www.rbwm.gov.uk



Royal Borough  
of Windsor &  
Maidenhead

Friday 5<sup>th</sup> July 2019

Dear Sirs

**Re: Royal Borough of Windsor & Maidenhead**

**Response to Airspace Change: consultation on a decision-making process for PPR proposals.**

On behalf of the Royal Borough of Windsor & Maidenhead (RBWM), I would like to take the opportunity to formally submit the representations to the Civil Aviation Authority's consultation into Planned and Permanent Redistribution of air traffic (PPR). This is further to previous responses made regarding airspace modernisation.

The residents of the RBWM reside just over 2 miles from the end of the nearest runway at London Heathrow Airport (LHR), with central Windsor 6 miles from the northern runway. Residents suffer greatly from noise impacts and blight caused by LHR. Recently new flightpaths from Heathrow, which flew over Ascot residents for the first time, had to be stopped because the outcry was so great.

The Royal Borough has also long called for full easterly alternation as one of its prime objectives; to be enabled by the abandonment of restrictions as set out within the Cranford agreement.

However, despite the government committing to the abandonment of the agreement and Heathrow achieving planning permission to enable this objective, the airport have recently decided not to pursue the works required, choosing instead to roll this work into the DCO application – thus prolonging the adverse impacts for residents unnecessarily. Disappointingly there has been little comment from government, nor the CAA on this avoidable delay, giving rise to a lack of trust between communities, airport and regulator

This submission is made without prejudice and follows previous representations to the CAA, DfT (in relation to the NPS put forward for new runway capacity at London Heathrow Airport - LHR), Night Flights Regime, the Airports Commission and further to legal correspondence sent to the Secretary of State for Transport and the Governments legal department, via our instructed legal representatives (Harrison Grant) in partnership with the London Boroughs of Hillingdon, Richmond, Wandsworth, Hammersmith & Fulham, Greenpeace and the Mayor of London.

W: 1



With this context in mind, the Council makes the following representations to the eight questions set out within the consultation, as set out below.

Broadly speaking, the Royal Borough welcomes any further scrutiny to be applied to the distribution of flights, whilst also pushing for such scrutiny to be based on an improved evidence base – such as noise impact methodology and the assessment of cumulative effects.

Yours sincerely



**Cllr John Bowden**  
**Chairman of the Aviation Form**  
**Royal Borough of Windsor & Maidenhead**  
cc: [airspace.policy@caa.co.uk](mailto:airspace.policy@caa.co.uk)

## GENERAL OBSERVATIONS

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

About right
<b>Minor modifications needed</b>
<b>Significant modifications needed</b>
Don't know

**Answer:** The process put forward relies upon the Air Navigation Service Providers (ANSP) voluntarily bringing forward schemes they consider 'relevant' Planned and Permanent Redistributions (PPRs) to the Civil Aviation Authority (CAA).

There appears to be no retrospective application of the decision making process, should a PPR be deemed to meet the type 1 criteria (for example) on review implementation. A review mechanism is therefore recommended to account for the varying degrees of data granularity used by ANSPs.

The 3dB threshold put forward within the 'Type 1' PPR proposals, on the advice of the CAA, would seem arbitrary. RBWM do not believe there is yet an adequate methodology to properly set out the full impacts of noise from air traffic movements. The Council has yet to see any meaningful attempt by government to address the correct mechanisms for modelling noise to allow for a 3dB change to be taken as an indicator of change.

## IDENTIFYING A 'RELEVANT PPR'

2 [OPTIONAL]. Do you have any comments on the way the CAA is interpreting the definition of 'relevant PPR'?

**Answer:** Notwithstanding the comments made with regard to the 'Type 1' proposals (Q1), the 5000 movement threshold used for 'Type 2' PPR changes appears not to account for airports such as London Heathrow, who operate more than one SID. The cumulative effect of multiple SID changes appears not to have been included in the assessment.

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
<b>Don't know</b>



**Answer:** This depends on the granularity of data available to the ANSP, as acknowledged within the PPR proposals. There is also the need for this decision making methodology to be transparent to the residents that have the propensity to be overflowed as a result.

#### **PROPOSED PPR DECISION-MAKING PROCESS**

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

Yes, something more is needed
No
Don't know

**Answer:** No answer provided.

**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)?**

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

**Answer:** No answer provided

**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, something more is needed
No
Don't know

**Answer:** As the regulator accountable, it is recommended that the CAA have a level of oversight into any post-implementation report, so that communities can have confidence in the findings being reported.

**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

**Answer:** No answer provided.



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## **IMPLEMENTING THE NEW PROCESS**

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

**Answer:** It may be argued that this consultation is slightly premature, owing to the remit, function and guidance associated with Independent Commission on Civil Aviation Noise (ICCAN) not being set out and approved by Government.

The consultation appears also to be weighted to more densely populated areas, potentially at the expense of rural communities; stating that "the number of stakeholders potentially affected by a proposed PPR change will determine how extensive a consultation must be". RBWM would like to highlight that background levels in more rural communities are often lower, with changes more pronounced – beyond that experienced in urban communities where population numbers are higher.



[REDACTED]

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To: [REDACTED]  
Subject: [REDACTED] Content  
RE: Consultation response received [REDACTED]

-----Or [REDACTED]  
From: [REDACTED]  
Sent: 10 May 2010 12:22  
To: S [REDACTED]  
Subject: Re: Consultation response received - [REDACTED]

Hello,

RE: [REDACTED] - My response to PPR

Whilst I have responded to your questions as requested, I would like to expand / supplement my comments as below:

It is a valid concern that noise pollution occurs when ATC's take day to day decisions and yet the consequences of those decisions, from a noise or air pollution perspective, are non existent.

I would like to specifically discuss my situation living close (15 miles ) to Stansted airport, which may not be relevant for other UK airports.

Essentially, Stansted airport has just the single runway and I am only impacted by arrivals to runway 04.

Of course, I am also impacted by numerous aircraft from LHR, Luton airports as well as many more on route to / from East Midlands airport, Manchester, CDG etc because they all seem to use the same 'corridor' and fly above my house. That said, because they overfly at 5,000ft and above they do not count, even though they are actually very noisy, especially when they pass by every 1 or 2 minutes.

Runway 04 at Stansted does not have CDA, which I find incredible, especially as we embark upon a new UK airspace policy.

It is difficult to understand how the third largest airport in the UK and largest freight operator with significant night flights has a runway that is not fit for purpose and arguably unsafe. As a direct result (as confirmed by Stansted Airport) , their aircraft fly at lower altitudes over Harlow Town than they should.

Indeed, at least 20% of the aircraft overfly Harlow at 1,600ft (according to Webtrak) which is approx. 1,950ft amsl and I would guess approx. 1800ft agl at Jean McAlpine nature Environmental park, or 1850ft at Princess Alexandra Hospital both of which are on primary aircraft routes from both the east and the west swathe. Majority of aircraft are level flying for 15 miles.

At night (23.30hrs onwards) , aircraft are at an altitude typically of 2,500 amsl or 3,000amsl overflying the Hospital. Indeed, most nights when the wind is from NNE aircraft they overfly the Hospital (or within 300m of it) from 22.00hrs until 02.00hrs the following morning, usually every 2 minutes. These aircraft use a variety of arrival spur tracks as determined by either the ATC, or the pilot and there seems no priority to use a route that does not overfly the Hospital or the environmental park, even though, most other airports are closed after midnight and thus the airspace is fairly unrestricted. Indeed, alternative routes over the west swathe are far less densely populated thus having much less impact upon sleep deprivation.



Many of the aircraft overflying the Hospital are turning, reducing altitude and speed, all of which increase noise, especially late at night when the ambient noise is significantly less. Many of these aircraft are noisier freight aircraft in the early hours of the morning until 05.00hours. The patients hear the noise every 2 minutes, so as the noise from one aircraft dies down, so the next is passing overhead, very stressful.

In addition, it is often the case that as the aircraft passes over the Hospital, it starts to descend and the majority of the time it is below the minimum permitted altitude before it leaves Harlow Town, which is prior to ILS joining point, however, as it is under the control of ATC, noise and air pollution are swept under the carpet, so oversight is critical, in my humble opinion. There do not appear to be any operational restriction on Harlow, as there are in other surrounding towns and villages (with much less population).

Overflying the Hospital at such low altitude unnecessarily, is dangerous and irresponsible. Furthermore, the Hospital is arguably not even on a direct line from the centre runway, which is where the proposal to monitor lateral changes would be useful. Many, many aircraft approaching from the west overfly Harlow over the centre line of the runway circle back to the centre line wasting time, energy (increasing pollution and noise needlessly) overflying Harlow for no reason.

I would expect that in the year 2019, satellite navigation would be able to ensure that aircraft fly in a much narrower swathe / spur tracks than those proposed in the PPR. Similarly, aircraft should be flying much higher than 2,000ft on arrival, which would significantly reduce noise levels and impact upon sleep deprivation.

It is interesting to note that when the wind is from NNE, the pattern of arriving aircraft is pretty much the same, 16.00hrs and 22.00hrs are popular times to overfly the Hospital (plus other times of course) but it highlights that ATC simply use the same routes as used previously / historically and irrespective of whether a better route is available at that time. And if the pattern of aircraft used to be in respect of 12 aircraft an hour historically but is now 30 aircraft per hour, the impact at ground level is irrelevant because ATC / airports believe nothing has changed.

I believe that aircraft approaching Stansted airport runway 04 from the west should never cross the centre line of the runway.

I believe that aircraft approaching Stansted airport runway 04 from the west should be established and stable on the centre line of the runway much further out (from the runway approach) than they are today.

I believe that any runway without CDA must have restrictions on the number of aircraft that it can handle per hour and restrictions on overflying densely populated areas and key buildings such as schools, Hospitals etc., also restrictions on freight aircraft arriving late at night / early hours of the morning.

I believe that aircraft approaching runway 04 Stansted from the east should avoid Harlow and join those aircraft from the west dovetailing as appropriate at the same point on the centre line with only minor exceptions using spur tracks all over Harlow Town.

I believe that aircraft from LHR must reach an altitude of 11,000ft agl when overflying Harlow Town and those from Luton must be at a minimum of 10,000ft. I believe that it is foolish to believe that an aircraft produces zero noise when over 4,000ft.

Thank you for the opportunity to voice my concerns, I hope that measures are taken to address them because I have to put up with such noise on a regular basis which is totally unnecessary if runway 04 has CDA thus aircraft fly at a higher altitude and aircraft from Luton / LHR also flying at slightly higher altitudes (30 and 50 miles away), which I do not believe is an unreasonable request in this day and age!

Kind regards

Lee Munden

----- Original Message -----