

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.

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