



## **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.  
[http://stopstanstedexpansion.com/documents/SSE\\_Submission\\_to\\_NATS\\_on\\_PBN\\_\(F\).pdf](http://stopstanstedexpansion.com/documents/SSE_Submission_to_NATS_on_PBN_(F).pdf).

**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.