

## Response ID ANON-34E5-VKB6-T

Submitted to **Airspace change: a decision-making process for PPR (planned and permanent redistribution of air traffic) proposals**  
Submitted on **2019-07-07 11:41:24**

### About you

#### A What is your name?

**Name:**  
Marilyn Leather

#### B What is your email address?

**Email:**  
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#### C If you are affiliated with any organisation, please tell us its name:

**Organisation:**  
Prestbury Parish Council, Cheshire

Yes

#### D Are you answering as:

Elected political representative

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

North West

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

**More info about respondent:**  
No

#### G Do you consent to your response being published?

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(name, organisation, respondent category, location, additional information - please note your email address will NOT be published if you choose this option)

### General observations

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

About right

#### Overall approach - comments:

The CAP 1616 process is now familiar to airports, Air Navigation Service Providers (ANSP) and impacted stakeholders. It makes complete sense to use a scaled down version, where appropriate, of the CAP 1616 for a relevant PPR decision-making process. Recognising noise impacts that could be as significant as those arising from a Level 1 major airspace change and applying clarity, transparency and engagement with affected stakeholders are the same best-practice principles in CAP 1616. One slight difference is in a temporary relevant PPR, where only airspace users are formally consulted, and impacted communities will only be kept informed. The proposed process allows flexibility to extend the 42-week timescale, if for example a second consultation is required or the process can be shortened when appropriate, perhaps for a relevant PPR over the sea. It introduces extra safety measures specific to the relevant PPR proposal. Overall the document is clear and highlights where the differences lie between the proposed relevant PPR process and the CAP 1616

### Identifying a 'relevant PPR'

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

**CAA definition of RPPR:**  
No

**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?**

Yes

**Comments on trigger:**

The CAA has established there is a need to identify relevant PPR's at a very early stage. At present, it is only the ANSP that knows that an air traffic control operational procedure change is under consideration. The CAA does not control whether or not a change is adopted (other than on safety grounds). By introducing a 'trigger' process, to enhance the ANSP safety management system, this will identify any change that could alter traffic patterns and alert early on whether a change meets the criteria for a relevant PPR check. After 1st November 2019, it will still only be the ANSP that knows an air traffic control operational procedure change is under consideration. But, by introducing this process it ensures that the ANSP must initiate the CAA decision-making process and more importantly, that a relevant PPR proposal is not implemented without CAA approval. This would allow impacted communities to be consulted early in the process and would potentially avoid another Edinburgh 'Gosnam' route incident.

**Proposed PPR decision-making process**

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

Yes, something more is needed

**Anything missing - comments:**

If the noise impact, that would be incurred by a relevant PPR, is as severe as a Level 1 airspace change, why is it considered 'disproportionate' to have a Public Evidence Session in the proposed PPR decision-making process? To maintain transparency, the removal of this process together with no call-in by the Secretary of State, no right to appeal, except for a judicial review, may invoke mistrust by stakeholder communities. Furthermore, there is no 'oversight committee' in CAP 1616. Will the PPR process have the use of a Third-Party Facilitator, as in CAP 1616? Would the CAA revisit a relevant PPR proposal, retrospectively, to implement any guidance when the report from ICCAN is produced?

The Air Navigation Guidance acknowledges the important role local communities have in any airspace change process, this consultation repeats many times the need for transparency and the importance of keeping communities informed. Communities need to feel confident their views are listened to and considered properly.

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

**Multiple or binary options? - Type 1:**

Multiple

**Multiple or binary options? - Type 2:**

Multiple

**Multiple or binary options? - Type 3:**

Multiple

**Multiple options - comments:**

Exploring multiple options is perhaps better, because some options available may actually be found to cause less potential impact, rather than scaling it down to just one or two options, as in a binary choice.

**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

**PIR as ANSP report - comments:**

Would the CAA introduce a Formal Record Keeping process so all comments positive or negative and consultation meetings with all stakeholders are minuted and published in full, rather than just a collated version ? Adopting this process would demonstrate transparency and assure stakeholders their views and objections are being taken into account in the post-implementation report.

**Temporary changes**

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

Yes

**Temporary changes - comments:**

Providing the initial application for a temporary relevant PPR was not hiding the intention to extend this beyond six months or for it to be a permanent PPR, thereby avoiding the time and cost of a permanent relevant PPR process. If the ANSP is to collate and monitor complaints during the temporary relevant PPR, would these be published in full on the portal? A scaled decision-making process for a temporary relevant PPR is perfectly proportionate for equipment repair.

**Implementing the new process**

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

**CAA aiding implementation:**

Referring to the heading 'Relevant PPR caused by a change in airspace design or other knock-on effects' on page 72 at para 5.15 – 'A change elsewhere may have knock-on effects that require changes in air traffic control operational procedure at a different airport and therefore, potentially by a different Air Navigation Service Provider'. The CAA would welcome observations on this issue. I remember some time ago the CAA was considering an outside bespoke organisation, rather than a sponsor, to compile a nationwide 'Roadmap Policy' for airspace design. This was specifically to prevent a 'knock-on' effect with other airports when implementing a relevant PPR. Is this still for consideration?

Finally, I found it necessary to contact the CAA to clarify a number of points in the consultation. I would like to thank them for their full and speedy responses in answering my queries. This is very reassuring.