

# 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*'.  
*"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.

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## 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 it 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.

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