

## Response ID ANON-V5D1-A1SA-6

Submitted to **Draft airspace design guidance**

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### About you

#### A What is your name?

**Name:**

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#### B What is your email address?

**Email:**

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#### C Where do you live?

East Midlands

#### D Are you answering this consultation as:

Representative or national organisation or institute

#### E Are you affiliated with any organisation?

Yes

**Affiliation:**

General Aviation Alliance

Yes

#### F Is there anything else that you would like us to know about you regarding this consultation?

**Please enter any further details:**

This is a hugely time consuming response format. As a consequence, we have instead submitted a free text response under 'General Observations'.

#### G Do you consent for your response to be published?

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(name, location, respondent category, organisation, additional information - please note your email address will NOT be published if you choose this option)

### General observations

#### 1 Considering the draft guidance overall, to what extent does it meet the following criteria?

**Overall process matrix - Comprehensible – it is clear to me what happens:**

**Overall process matrix - Transparent – the activities are explained well and will take place as publicly as possible:**

**Overall process matrix - Proportionate – the guidance strikes the right balance between detail as to what should happen, and flexibility to allow for different local circumstances:**

**How would you improve?:**

1. A better ACP process was an implicit commitment of the Governments 2015 GA Strategy and is an agreed CAA action. Trust in the existing ACP process is low through insufficient transparency and a significant imbalance in addressing the needs of commercial and non-commercial stakeholders. We are encouraged that the CAA has developed a revised ACP process and that the need for clear guidance on developing and responding to proposed airspace changes is recognised, particularly as the revised process is inherently more complicated than the current process.
2. A recurring significant issue, also identified within the CAP 1389 consultation, is ACP sponsor inadequate or non-existent early engagement with stakeholders regarding design principles. As there is ample evidence that it is unusual for an ACP to be unchallenged, early engagement with affected stakeholders on design principles is essential to develop a cooperative relationship and efficient approach from the outset rather than a combative relationship and inefficient and costly activity later in the process. As routinely described to the CAA by our member organisations, the GA Alliance and its member organisations stand ready to participate in early engagement ACP design principles. The ACP process must be unequivocal about this important issue. Unfortunately the draft requirement within the consultation is ambiguous.
3. While emphasising early engagement with local stakeholders, the current text in CAP 1520 does not require early engagement by ACP sponsors with national organisations, eg GA Alliance member organisations, other than where traffic flows are to be changed below a specified height. We recognise why a sponsor

would not need to engage with local communities where traffic flows below a specified height remain unchanged. However, transiting GA and air sport activity based beyond the local area is routinely impacted by airspace change regardless of height or whether or not the related traffic flows change. We propose that a requirement for early engagement with GA and air sport organisations on ACP design principles regardless of traffic flows and height is clearly expressed within the CAA's guidance.

4. Welcome elements of the CAA's revised ACP process that will benefit from clear guidance for stakeholders include;

- Use of the single bespoke website forming an airspace change portal for anyone to view, comment on and access documents for every airspace change proposal
- Recommended use by sponsor of an independent third-party facilitator to make early engagement with stakeholders on design principles more effective, and potentially also for formal consultation
- Publication of airspace change consultation responses online as they are received
- Public Evidence Session for some changes with greater impact (Level 1) allowing stakeholders to address the CAA decision-maker once a proposal has been submitted
- Publication of a 'minded to' decision for public review for changes on which we believe there could be a risk of misinterpretation or misunderstanding of some of the evidence

5. It is important that the guidance should not assume the stakeholder using the guidance holds anything other than a very basic level of airspace technical, legal or national governance knowledge.

**General observations:**

### **Tier 1a: Stages 1 to 7**

**2 Considering Stage 1 (Define) of the process, to what extent does the draft guidance on that stage meet the following criteria?**

**Stage 1 matrix - Comprehensible – it is clear to me what happens:**

**Stage 1 matrix - Transparent – the activities are explained well and will take place as publicly as possible:**

**Stage 1 matrix - Proportionate – the guidance strikes the right balance between detail as to what should happen, and flexibility to allow for different local circumstances:**

**How to improve:**

**3 Considering Stage 2 (Develop and assess) of the process, to what extent does the draft guidance on that stage meet the following criteria?**

**Stage 2 matrix - Comprehensible – it is clear to me what happens:**

**Stage 2 matrix - Transparent – the activities are explained well and will take place as publicly as possible:**

**Stage 2 matrix - Proportionate – the guidance strikes the right balance between detail as to what should happen, and flexibility to allow for different local circumstances:**

**How to improve:**

**4 Considering Stage 3 (Consult) of the process, to what extent does the draft guidance on that stage meet the following criteria?**

**Stage 3 matrix - Comprehensible – it is clear to me what happens:**

**Stage 3 matrix - Transparent – the activities are explained well and will take place as publicly as possible:**

**Stage 3 matrix - Proportionate – the guidance strikes the right balance between detail as to what should happen, and flexibility to allow for different local circumstances:**

**How to improve:**

**5 Considering Stage 4 (Update and submit) of the process, to what extent does the draft guidance on that stage meet the following criteria?**

**Stage 4 matrix - Comprehensible – it is clear to me what happens:**

**Stage 4 matrix - Transparent – the activities are explained well and will take place as publicly as possible:**

**Stage 4 matrix - Proportionate – the guidance strikes the right balance between detail as to what should happen, and flexibility to allow for different local circumstances:**

**How to improve:**

**6 Considering Stage 5 (Decide) of the process, to what extent does the draft guidance on that stage meet the following criteria?**

Stage 5 matrix - Comprehensible – it is clear to me what happens:

Stage 5 matrix - Transparent – the activities are explained well and will take place as publicly as possible:

Stage 5 matrix - Proportionate – the guidance strikes the right balance between detail as to what should happen, and flexibility to allow for different local circumstances:

How to improve:

**7 Considering Stage 6 (Implement) of the process, to what extent does the draft guidance on that stage meet the following criteria?**

Stage 6 matrix - Comprehensible – it is clear to me what happens:

Stage 6 matrix - Transparent – the activities are explained well and will take place as publicly as possible:

Stage 6 matrix - Proportionate – the guidance strikes the right balance between detail as to what should happen, and flexibility to allow for different local circumstances:

How to improve:

**8 Considering Stage 7 (Post-implementation review) of the process, to what extent does the draft guidance on that stage meet the following criteria?**

Stage 7 matrix - Comprehensible – it is clear to me what happens:

Stage 7 matrix - Transparent – the activities are explained well and will take place as publicly as possible:

Stage 7 matrix - Proportionate – the guidance strikes the right balance between detail as to what should happen, and flexibility to allow for different local circumstances:

How to improve:

### **Tier 1a: Evidence of engagement**

**9 At certain stages in the process (starting with the development of design principles at Step 1b) the CAA will look for evidence of a two-way conversation to see that the sponsor has adequately engaged stakeholders. In paragraph C9 the CAA describes the evidence that we will look for as "detail of what sponsors have been told by their audiences; how they responded to this feedback; and how it has affected the proposals they are bringing forward". Has the CAA adequately detailed what we would expect to see to know that a two-way conversation has taken place?**

Not Answered

What else to show two way conversation?:

### **Tier 1a:Third-party facilitation**

**10 At various points in the process (starting with the development of design principles at Step 1b) the CAA suggests that voluntary use of a third-party facilitator could be useful. Should the CAA be more prescriptive as to how and when a facilitator could be used?**

Not Answered

Facilitator further detail:

**11 Are there any other places in the process at which you feel that a facilitator would be useful?**

Facilitator - which places:

### **Tier 1a: Categorisation of responses**

**12 In paragraphs 177 and C34-C36, and Table C2, we discuss the categorisation of consultation responses. The sponsor is required to sort consultation responses into two categories: i) those responses that have the potential to impact on the proposal because they include new information or ideas that the sponsor believes could lead to an adaptation in a lead design option or a new design option, and ii) those that do not. Is the CAA's explanation of the categorisation exercise and description of the categories sufficient?**

Not Answered

Categorisation - additional detail:

### **Tier 1a: Options appraisal**

13 In paragraph E25 and E34 the CAA states that methodologies for the various aspects of the options appraisal should be agreed between the CAA and the sponsor at an early stage in the process, on a case-by-case basis. This provides flexibility for different local circumstances. Does this approach strike the right balance between proportionality and consistency?

Not Answered

OA - explain re proportionality :

#### **Tier 1a: Safety information**

14 At each stage in the airspace change process that an options appraisal takes place, the sponsor will be required to submit a safety assessment. The sponsor will be required to provide a plain English summary of the safety assessment and the CAA will provide a plain English summary of its review (i.e. of the Letter of Acceptance, which forms the CAA's review of the safety assessment) when it makes a decision. These documents will be available on the portal. Do you have any views on specific information that should be included and/or excluded from the plain English summary of the sponsor's safety assessment and the CAA's review?

Safety assessment:

#### **Tier 1b: Temporary airspace changes**

15 Considering Tier 1b changes, to what extent does the draft guidance on temporary airspace changes meet the following criteria?

Tier 1b matrix - Comprehensible – it is clear to me what happens:

Tier 1b matrix - Transparent – the activities are explained well and will take place as publicly as possible:

Tier 1b matrix - Proportionate – the guidance strikes the right balance between detail as to what should happen, and flexibility to allow for different local circumstances:

How to improve:

#### **Tier 1c: Operational airspace trials**

16 Considering Tier 1c changes, to what extent does the draft guidance on operational airspace trials meet the following criteria?

Tier 1c matrix - Comprehensible – it is clear to me what happens:

Tier 1c matrix - Transparent – the activities are explained well and will take place as publicly as possible:

Tier 1c matrix - Proportionate – the guidance strikes the right balance between detail as to what should happen, and flexibility to allow for different local circumstances:

How to improve:

#### **Tier 1: Spaceflights**

17 On 21 February 2017 the Government published the Draft Spaceflight Bill. As the foreword to the draft Bill sets out, "This legislation will see the Department for Transport and the Department for Business, Energy and Industrial Strategy, the UK Space Agency, the Civil Aviation Authority and the Health and Safety Executive working together to regulate and oversee commercial spaceflight operations in the UK." Do you have any views on whether this process could be used or adapted to suit future airspace change proposals to enable spaceflights, as anticipated in the Draft Spaceflight Bill?

Spaceflight:

#### **Tier 2: Permanent and planned redistribution**

18 The Government proposals talk about a Tier 2 change as one which is likely to alter traffic patterns below 7,000 feet over a populated area and which therefore could have a potential noise impact for those on the ground. The key requirement is that the air navigation service provider must demonstrate that it has assessed the noise impact of the proposed change and engaged with affected communities as appropriate. Which stages of the Tier 1a airspace change process do you think are necessary for a proposal categorised as a Tier 2 change? Please select all those which apply:

Tier 2 reasons:

19 The CAA's process for Tier 1a changes is scaled into 'Levels', based on the altitude-based priorities in the Government's Air Navigation Guidance (i.e. where noise impacts are to be prioritised or considered alongside carbon emissions, a more demanding consultation is required). Could the future Tier 2 process also be scaled?

Not Answered

**Tier 2 - scaled reasons:**

**20 Are there any other comments that you would like to make about the CAA's potential Tier 2 process?**

**Tier 2 - other comments:**

**Tier 3: Other changes to air operations affecting noise impacts**

**21 To what extent does the draft best practice guidance on Tier 3 changes (other changes that may have a noise impact) meet the following criteria?**

**Tier 3 matrix - Comprehensible – it is clear to me what happens:**

**Tier 3 matrix - Transparent – the activities are explained well and will take place as publicly as possible:**

**Tier 3 matrix - Proportionate – the guidance strikes the right balance between detail as to what should happen, and flexibility to allow for different local circumstances:**

**How to improve:**

**22 Where industry does not follow the CAA's guidance in respect of Tier 3 changes, or where there is a clear breakdown of trust between an airport and its stakeholders, is it appropriate for the CAA to publicly draw attention to this?**

Not Answered

**CAA action on Tier 3 further detail:**

**23 Considering the list of potential information proposed, would you suggest any additions which would help stakeholders, including communities, understand the impacts of Tier 3 changes and enhance transparency?**

**Additional information on Tier 3 impacts :**

**24 In relation to mitigating the impacts of Tier 3 changes, our draft guidance says that the focus should be on exploring the options for mitigating the change through two-way dialogue, because of the local and often incremental nature of Tier 3 changes. Does the guidance need to give more detail?**

Not Answered

**Tier 3 mitigation - reasons for Q24 answer :**