



CAA Consultation on Airspace Change Process

The following sets out Plane Wrong's responses to the CAA's 2016 consultation on the Airspace Change Process.

Plane Wrong is a non-party-political group set up in September 2014 from communities near Gatwick Airport to provide a voice for local residents who are concerned about the increase in aircraft noise. The group has around 2,000 supporters who are severely affected by recent changes to flight paths to the north of Gatwick, namely routes R26DVR/BIG/CLN/LAM (Route 4) and R08KEN/SAM (Route 3).

Question 1: Will the new process gateways improve the airspace change process?

Yes.

Overall Plane Wrong welcomes the CAA proposals to improve the Airspace Change Process. The proposals offer great potential to enhance the transparency of the decision making, to increase the rigour of appraising different options and to provide a much improved framework for engaging with local stakeholders in the process. However, much will depend on how the process is implemented in practice. The supporting guidance documents will be very important in defining the quality of the process and the requirements which the CAA and sponsor organisations should follow.

Specific observations on the process are set out in response to the individual questions below. However, we would like to reinforce the following general observations:

- The CAA must consider its role as an independent regulator of airspace protecting the interests of local communities, not just as facilitator of growth of the aviation sector.
- The CAA must be transparent about the weight it gives to different factors in the decision making process and must ensure that economic factors do not dominate
- Much more work is required to understand and measure the noise impacts to local communities which arise from airspace changes – the Leq contour approach has been widely demonstrated to be inadequate. We recommend that absolute limits to environmental impacts are identified; this would mean that any change that results in a breach of those limits would not be permitted.
- The CAA and sponsors should recognize that even relatively small airspace changes can have a significant impact on local communities. As such, the process should be applied, at an appropriate level, to all changes including those associated with vectoring.
- Engagement with local communities should be authentic, not just a tick box exercise, and sponsors should ensure that clear information is provided and that consultation events are well advertised.
- We believe strongly that an appeals procedure should be included in the process, and that this should be managed by an ombudsman or the Independent Noise Authority.

Question 2: Should the sponsor engage local stakeholders to agree design principles for the airspace change?

Yes.

We support the engagement of local stakeholders in agreeing the design principles.

However, greater clarity is needed regarding 'engaging with local stakeholders'. Previously, this has meant engaging with Parish Councils who have no obligation to seek the views of local residents. We take the definition of 'local stakeholders' to include community groups and residents. We would like to have the definition of local stakeholders well defined in the supporting guidance for the Airspace Change Process. Stakeholder mapping in accordance with best practice should be undertaken at the early stages of the airspace change process (Refer to 2012 Olympics <http://learninglegacy.independent.gov.uk/documents/pdfs/equality-inclusion-employment-and-skills/426301-ll-public-partic-comm-engage-aw.pdf> and Cabinet Office

Principles

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/492132/2016_0111_Consultation_principles_final.pdf

).

Further, it is very important that engagement with communities is more than a tick box exercise. Previously, public meetings have been held in local parishes. We know of one occasion where no member of the public attended the public meeting because the opportunity and importance of the meeting was inadequately communicated to local residents. Yet, this was still recorded by the sponsor as a public meeting and used as an example of consultation and implied support for the proposed change.

In relation to engagement on the design principles, we have found this to really help communities understand the benefits and limitations of change. Engagement also helps airspace designers to understand community concerns; it also encourages them to think differently about the way in which airspace changes are designed.

This approach has particularly benefited both Gatwick Airport and local communities in the redesign of Route 4. Here proposed changes were discussed with Plane Wrong and the wider community. It should be noted that we had additional support from independent airspace consultants to help us understand the design process and to make alternative recommendations to GAL in the way in which Route 4 was designed.

It would have been useful if the consultation documentation (CAP 1389) had described more fully what is meant by "design principles". We take this to include agreement of the desired outcomes from an airspace change as well as the approach to design. As part of this, the change sponsor must clearly articulate the need for a proposed airspace change in order that local stakeholders can contribute and agree to the design principles.

We would further add that the mechanism for how the results of engagement with stakeholders will be taken into account of, both in the development of design principles by the sponsor and the final decision making process by the CAA. This mechanism should be made clear in order that local stakeholders can trust that they will be listened to, at all stages of the Airspace Change Process, including the post implementation review (Stage 7). Further, that in the appraisal of options in subsequent stages of the proposed Airspace Change Process, weight is given to the views of local stakeholders and that the CAA is transparent in how this is taken into account in the final decision.

Question 3: What types of data would you find it useful for the sponsor to provide when engaging local stakeholders about design principles? How should this data be presented?

The CAA refers in the consultation documentation to flightpaths as a form of infrastructure and makes the link with the planning system. We believe that important lessons can be taken from the planning system and in particular, the Environmental Impact Assessment process in considering what information would be useful .

Local communities are interested in the degree of change, and especially noise. As such, information should be provided which demonstrates the proposed changes and their likely impacts. We would specifically like to see:

- The current line of flightpaths plotted on clear maps based on tracking data
- The current quantities and frequencies of aircraft using any route in question.
- Data on the height of aircraft at different points along that route.
- Baseline noise levels at different points along the route.
- An assessment of air quality impacts at different points along the route.
- Projections on increase in aircraft traffic
- Numbers of people impacted by noise shadow including at different times of day, including night flights, and year
- Percentage distribution of flights as a total of departures and arrivals

For the information above, it will be necessary to have at least a full year of data and it will be important to illustrate any historical shifts in the way in which airspace has been used.

In relation to the issue of noise, we find the current measures of noise are not well understood, either by industry or by affected communities. Leq contours have been shown to be a completely inadequate measure of noise impacts. The CAA should consider how noise impacts are measured and communicated as part of this process. Evaluation of noise should take into account:

- The new World Health Organisation guidance on noise levels
- Relative and absolute noise levels, recognising that background noise has a mitigation effect
- Persistence of noise, in particular the duration and frequency of noise impacts.
- Emerging evidence on the relationship between noise and mental health impacts
- Noise shadow at different elevations and different types of aircraft

- Time of day, including night flights and time of year

Against the background information, we would like to see:

- Proposed options plotted on clear maps where towns and village locations are legible, local topography is illustrated, and boundaries of any NPR swathe are not obscured by flight tracks.
- An assessment of the likely impacts associated with different options that will need to be addressed in the design stage including environmental impacts such as SOX, NOX and CO2 emissions.
- Assessment of impacts to sites of special interest such as Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest and other local habitats and tranquil areas.
- Comparison of populations impacted by noise shadow taking into account local topography

Depending on the local context, communities may need additional information. As such we recommend a 'scoping' exercise is carried out with representative groups to highlight any gaps in information within reasonable limits, similar to the approach undertaken in the planning process.

In relation to the clarity of maps, we refer to the 2012 airspace change proposal relating to flight paths around Gatwick Airport. The consultation documents provide an example of poor practice in illustrating proposed changes. The maps included were illegible and the locations of local towns and villages could not be made out and were obscured by data plots.

In relation to environmental assessment, we refer to the ECRD report that was produced in support of the airspace change proposal referred to above. This also provides an example of poor practice in the evaluation of potential impacts. The report presumed that changes as a result of the implementation of PRNAV would have no impact on noise or any other environmental indicators, and it was proved to be a wholly inadequate assessment of the reality of the changes made.

Question 4: In addition to specific detail, what general background information would you find it useful for the sponsor to provide as context for its proposals?

We would like information on why the change is necessary and what business benefits it will bring.

Question 5: Overall, will Stage 1 improve the airspace change process?

Yes

We particularly welcome the step to include local stakeholders in the design process in order to agree principles. More emphasis should be placed on illustrating to local communities the likely impacts of change in a clear and meaningful way. Providing information and support to communities to understand technical aspects of airspace proposals will be important in developing the design principles.

Supporting guidance will be especially important to ensure that process changes are meaningful and transparent and that due weight is given to local stakeholders in the evaluation of options and in the post implementation review.

We would also take this opportunity to reinforce the point that perceived small changes in airspace use can have a significant impact on the ground. As such, it is important that due process is applied to all proposed changes.

Question 6: Will introducing the options appraisal we propose improve the airspace change process?

Yes

If so, should this initially be a 'full' or 'indicative' options appraisal? Please give your reasons and any other views on options appraisal.

The appraisal of options against a Do Nothing scenario is particularly welcome. Following on from the answer to Question 3, options should be appraised to evaluate the environmental impact of different approaches and against the design principles as defined with local communities.

It is not entirely clear what is meant by a "full or indicative options appraisal" in CAP 1389 and so this should be clarified. However, we would make the following two points.

In developing options, it is inevitable that better information becomes available as the design progresses. As such, a full options appraisal should be developed from the outset and refined through the process to take account of further analysis.

Further, the danger with an indicative options appraisal is that it is not taken seriously in the way it is carried out and is therefore not fit for purpose. As part of the Route 4 changes, we have seen assessment of options that have been based on little more than intuition. This is not enough. As such, we would press for a full options appraisal which is then refined as the design progresses.

We also have deep concerns with the approach to monetising impacts of different options in absolute terms. These approaches are notoriously open to criticism about the way in which they are carried out and can be manipulated to reinforce a preferred outcome. They are sensitive to the way in which 'willingness to pay' estimates are established, the scope of considerations included, the way in which outputs are weighted, and the application of discount rates. The most high profile recent example of this is HS2. Here trust in the cost benefit approach was lost when it became apparent that it had been assumed that time on trains was unproductive. Nevertheless, we do understand the need to evaluate and navigate trade offs. Any cost benefit approach must acknowledge the sensitivities and limitations of the approach.

Importantly, cost benefit analysis should only be used to guide to decision making alongside other sustainability indicators in the appraisal matrix. It should be undertaken in a transparent way with assumptions clearly communicated. The CAA must be transparent in the weight of the information given to the cost benefit analysis in the decision making process. In particular, the CAA must ensure that economic factors do not drive the decision making process over and above social and environmental considerations.

Finally, we recommend that the CAA identify absolute limits on environmental impacts; this would mean that any proposals that breach these limits would not be permitted.

Question 7: Overall, will Stage 2 improve the airspace change process?

Yes.

However, clear guidance needs to be developed to ensure that the options appraisal is carried out in a rigorous and transparent way with assumptions clearly stated and sensitivity of the assessment explained.

Particularly important will be the methodology by which different aspects of the appraisal are taken into account in the decision making process and the weight given to each aspect to ensure that economic factors do not override social and environmental considerations.

Question 8: Would an independent third-party facilitator make a sponsor's consultation more effective?

No.

Based on our experience of dealing with airspace changes to Routes 3 and 4 from Gatwick Airport, it is difficult to see how an independent facilitator would have helped. A facilitator might have got in the way of discussions between the sponsor and local stakeholders.

However, we do believe that the CAA has an important role in ensuring that consultation and engagement is carried out in accordance with best practice and the guidance that will be produced. The CAA will need to take an active role in challenging change sponsors if inadequate information has been presented and if local stakeholder views have not been taken into account.

More broadly, the CAA needs to consider its role as a regulator and as to how it acts in the best interests of local stakeholders, not just the aviation industry. Reference is made to the way in which the Financial Services Agency (FSA) operates as a champion for consumers and place the emphasis on challenging industry to demonstrate their case. We would like the CAA to consider repositioning themselves to place the burden of emphasis on the industry to demonstrate why airspace change is required.

Question 9: Should the CAA publish all consultation responses in full, except to moderate them for unacceptable content?

Yes.

Question 10: Should the CAA publish airspace change consultation responses as they are submitted, rather than at the end of the consultation period?

Yes

Early publishing provides the opportunity for other respondents, and in particular local stakeholders, to gain insights that will help them to form a view. However, the danger is that this could lead public opinion and this should be carefully considered.

Question 11: Should consultation responses be made solely through the online portal?

No.

Online should be the primary route but opportunities to contribute for people who have accessibility requirements and members of harder to reach communities must be given. The CAA should refer to government best practice guidance on language and accessibility in public consultation.

Attention should also be given to the way in which consultation information is presented. Our experience of changes to arrival and departure routes around Gatwick Airport was that proposals on all routes around Gatwick were bundled together, graphical illustrations were illegible and language was inaccessible. As such, response rates were very low. This must be substantially improved for future consultations.

We also recommend testing alternative forms of engagement such as social media platforms and engagement events; these are increasingly used in urban development to engage harder to reach communities.

The drop in sessions on the Route 4 proposals provided useful information to affected communities. Although much could be done to improve the format and attendance at these types of events, they offer another mechanism to capture feedback on proposals.

Finally, consultations should be properly advertised. Our particular experience to changes around Gatwick Airport illustrated that consultations were so poorly advertised; this, combined with the impenetrable consultation documentation, meant that response rates were very low.

Question 12: Do you think that the consultation process proposed in Stage 3 achieves the right balance between fairness, transparency and proportionality?

Don't know.

Our view is that there is great potential for improving the consultation process. The change to the approach is very welcome but its success will depend on the quality of the consultation plan developed by the sponsor and on the effectiveness of the CAA's involvement in ensuring that consultation is carried out in accordance with best practice. The guidance produced to support this process will be particularly important in ensuring the success of this step of the process.

In addition to observations that the consultation process should be clear, transparent and use different forms of engagement, it will be especially important for the sponsor to indicate how consultation responses will be taken into account in the design of air space changes. There can be a lack of trust if a sponsor is perceived to be going through the motions of consultation and so the approach must be authentic.

Question 13: Overall, will Stage 3 improve the airspace change process?

Yes.

We believe that the principles described in the consultation document have the potential to improve the process. However, much will depend on how the process is applied in practice. Supporting guidance documentation will be especially important in setting the standard both for sponsors and the CAA.

Question 14: Should sponsors be required to adhere to a standard template for their airspace change submissions?

Yes.

A standard template can be helpful in ensuring the quality of submissions and consistency of information provided. However, it should allow for some flexibility to be able to respond to any particular local contextual issues.

We note that the CAA is not proposing changes to the list of information that accompanies a submission. Whilst the coverage of operational, environmental and consultation assessment seems appropriate, we have concerns over the quality of information that would be submitted. As highlighted above, our experience on the Route 3 and 4 airspaces around Gatwick Airport revealed the inadequacy of both the environmental assessment and consultation strategy. (See our response to question 3.) Guidance must be developed to ensure that submissions are of a high quality and in accordance with international best practice, and in particular draw on best practice within the UK planning process.

Within the template the sponsor should also include a timeline for implementation.

Question 15: Is it reasonable for the CAA to publish a redacted version of the submission, with commercially sensitive details removed, as soon as we receive it, before we have assessed and decided upon it?

Yes

Question 16: Overall, will Stage 4 improve the airspace change process?

Don't know

The process changes are welcome. However the degree in which the approach is improved will depend on the quality of the assessment that is undertaken, on the transparency and rigour of the options appraisal process and on the way in which consultation with local stakeholders is taken account.

Question 17: Will introduction of a new Public Evidence Session improve the airspace change process?

Yes

We believe a public evidence session will be a very good addition to the process and we very much welcome the proposal.

Key to the success of the sessions will be attendance by local stakeholders. This will require the sponsor and the CAA to ensure that the sessions are properly advertised. We recommend that this includes householder notification.

Question 18: Is Step 5B (CAA decision) a clear and transparent way of making an airspace change decision?

Don't know

As highlighted in responses to earlier questions, the CAA will need to be transparent in the way different benefits and impacts of proposed airspace changes are weighted in their evaluation. It will be important that the CAA champions the interests of local communities and does not allow economic growth arguments to dominate at the expense of social and environmental impacts.

Question 19: Overall, will Stage 5 improve the airspace change process?

Don't know.

As described above, it will very much depend on how the process is implemented.

Question 20: What are your views on our proposal not to introduce an appeal against process irregularities into the airspace change process?

We strongly believe that an appeals process should be included in the airspace change process. We note the arguments in paragraph 4.114 of the consultation document. Nonetheless Judicial Review is an expensive remedy and, given that the sponsor will inevitably have more money than private individuals, we feel that a valuable opportunity to make the process intrinsically fairer is being missed here. Of course a judicial review will, in theory always be available after an internal appeal, but the whole point of an internal appeal system would be to reduce the need for judicial review in the first place. We do not believe that it would be impossible to set up a fair internal appeal system.

Question 21: What types of data would you find it useful for the sponsor to provide, and in what form, when seeking feedback for its post-implementation review?

In relation to step 6, we propose that a clear timeline for implementation is published so that affected communities can track progress and be aware of when change happens. This has been especially useful on Route 4.

On data, we would like to see information presented that can be compared with the design principles as set out in our response to question 3. We will be especially interested in:

- Noise data at different points along the route to monitor changes against the baseline position
- A wider assessment of the environmental impacts including pollution loads
- Tracking of aircraft along the flight path
- Height of aircraft along different points along the route, taking account of local topography.
- Feedback on the changes from local residents

On the last point, it is not clear from CAP 1389, that it is proposed that communities would be able to provide feedback during the review period. The ability to provide this feedback will be very important as our experience suggests that changes can have impacts on the ground that

are different from the design intent. So we request that during the review period, the consultation portal remains open for feedback.

It is also very important that feedback given in this period is referenced back to the source of the complaint or in some way 'geolocated'. Feedback on modifications to Route 4 implementation are encouraged by Gatwick Airport. However this is carried out through an email address; consequently there is no way of knowing where the resident in question is located. So any data collected is not meaningful. Further, in the post implementation review of PRNAV on all departures and arrivals around Gatwick Airport in 2015, feedback from local stakeholders was aggregated in a way that was not possible to determine those associated with Route 3.

We also seek clarity on how feedback from local stakeholders will be taken into account in the post implementation review in relation to evaluation of whether the airspace change has achieved its objectives.

It is important to note the experience of Route 4 at Gatwick where the impact of airspace changes was very different from the sponsor's expectations and hence the route is now being further modified.

We have also recommended that the CAA establish absolute limits on environmental impacts. These should be measured as part of the post implementation review to ensure that they are not breached.

Overall, we welcome the commitment to publish this information on line alongside a report evaluating the impact of changes.

Question 22: Overall, will Stage 7 improve the airspace change process?

Don't know.

There remain uncertainties on how the post implementation process will take local stakeholder views into account when evaluating whether the objectives of airspace changes have been met.

We require reassurance that community feedback will be taken into account. In doing so, we recognise that there will be those that benefit from airspace changes. As such, the CAA must be sensitive to the way in which it requests feedback, avoiding leading questions, and the geographic location of respondents.

Question 23: Overall, will the airspace change process proposed in Chapter 4 achieve the right balance between fairness, transparency and proportionality?

Don't know.

Overall we welcome the CAA's commitment to improve the airspace change process. There is great potential for the process described in the consultation document but only if implemented correctly and in accordance with best practice.

Question 24: Should the CAA set up an Oversight Committee?

No

On balance, we feel that an Oversight Committee will not add to the process and we would be concerned about the balance of opinion given to specialists, that may not appreciate the particular local conditions, above those of local stakeholders.

However, the CAA does need to consider how it acts to demonstrate that it is a regulator of airspace policy and not just a facilitator of aviation growth. Again, we recommend that the CAA consider its role in championing the interests of local stakeholders and placing the burden of proof of benefits of airspace changes on the sponsor.

Question 25: Are there any other areas where the CAA should provide guidance?

Yes.

The impacts of airspace change are multidimensional. We recommend that the CAA should commission additional research to fully understand the impacts of airspace changes on local stakeholders to inform guidance on options appraisal. Noise is a particular area where impacts are not well understood. The Leq contour approach has been proven to be a wholly inadequate assessment of the noise impacts to local communities and where further research and guidance is required.

Question 26: Does Table 5.1 give sufficient clarity and detail of how the process will be scaled?

Yes.

We believe that the distinction between the levels is clear. However, clarification of ‘large scale changes’ in Level 1 may be necessary since even relatively small changes can have dramatic impact on communities. These will also include smaller scale changes which will have large impacts on communities such as changes in vectoring patterns at low altitudes above high ground.

Question 27: Do you have (i) any views on the way the Levels are categorised in Table 5.1, (ii) alternative suggestions as to how we might categorise different airspace changes, or (iii) other views about the proposed scaling of the process generally?

Q 27 (i)

Yes. We believe that 7,000 feet is a reasonable distinction between Level 1 and Level 2, but see below

Q 27 (ii) We do not accept that the 7,000 feet should be taken above mean sea level. The 7,000 feet should be measured from the height of the ground to be affected by the proposed change. It is important that the topography/nature of the landscape is taken into account.

Q 27 (iii) It appears that under Level 2 changes, “communities affected by impacts” are not to be consulted. This may be because the CAA believes that there will be no such communities. We do not accept this. We feel that in the case of Level 2 proposed changes local communities should be consulted at least at the early stages of the process (Step 1). It may be that no one is

interested, in which case the CAA could legitimately reduce its efforts. Please also see comments relating to initial scoping exercises and stakeholder mapping proposed in response to Q2 and Q3.

In both Level 1 and Level 2 cases, greater clarity is needed regarding 'engaging with communities'. Previously, this has meant engaging with (e.g.) Parish Councils; these have no obligation to seek the views of local residents. Local environmental groups must be made aware of proposed changes. Certainly in the case of Level 1 proposals, full efforts (including advertising in local papers, drop-in sessions and house to house leafleting) should be made to contact individual residents.

At Stage 7, it is vital that the CAA takes account of community feedback, especially in regard to Level 1 changes. The impact on the ground can often not be adequately ascertained until changes have been implemented.

Question 28: Do you agree that the number of airspace change proposals put forward to the CAA is likely to increase in the future?

Don't know.

It seems likely in crowded airspace where airports are seeking to increase passenger numbers and expand routes flown.

Question 29: Do you have any views about the CAA's interpretation of section 70 of the Transport Act 2000, as set out in Chapter 6?

Yes.

We note that the CAA's interpretation of s 70 as stated in paragraphs 6.8 and 6.9 is one which will tend to be favourable to the industry. We do not accept that this interpretation is a correct statement of the law.

Question 30: Do you have a preference for either of the options for recovering the CAA's airspace change costs that are set out in Chapter 7?

Don't know.

Please give your reasons and any other views on how the CAA recovers its airspace change costs.

Plane Wrong is a group representing local community stakeholders unconnected with the aviation industry and as such does not feel qualified to choose between these two options. However, it would seem reasonable for the sponsors of airspace change to cover the costs and recoup them through their ultimate clients.

Question 31: In the short term the CAA will still have to set up a new statutory charge. On which entity would it be most appropriate to levy this charge? Please give your reasons.

See reply to Q30

Question 32: Are our proposed transition arrangements between the old process and the new process reasonable?

Don't know

Please provide any further comments or evidence that would inform our proposed transition arrangements.

Yes, they are reasonable on the face of it, but as the requirements under Stage 7 currently are very unclear, it is very important that you allow for community feedback at this stage for airspace changes up to 7000'. Implementation is as important as the proposal stage.

Question 33: Are our timescales for introducing the new process reasonable?

Yes.

Please give reasons for your answer.

From the perspective of a local community group, the proposal appears reasonable as long as comments under Q32 are implemented. Much will depend on the supporting guidance documents.

Question 34: Do you agree with the concept of an online portal?

Yes

Please give reasons for your answer.

We support the intention to provide greater transparency and convenience. However, alternative arrangements must be considered for those who do not have sufficient computer skills to complete consultations in this way and for disabled, partially sighted and blind people. Please also see responses to Q11 and Q35.

Question 35: Should the online portal contain any functionality beyond what we describe, or documentation other than that shown in Table B1?

Ease of use of the portal is absolutely critical.

In the past, some consultation webpages have allowed the public to input only small amounts of text, with minimal control over format. This contrasts with the complete freedom over format enjoyed by the CAA, the change sponsor etc.

Similarly, no doubt, documentation put on the proposed portal by the CAA, the change sponsor etc will be held in standard electronic format such as .pdf. This would permit a wide variety of formats, also incorporation of tables and pictures and weblinks. It would be unfair if the public did not have the option to format their responses similarly – i.e. to upload in a variety of file format including MS Word and .pdf as opposed to being obliged to input direct to a webpage offering fewer options than those available to the change sponsor.

Question 36: What are your views on locating the sponsor's consultation on a CAA portal where the sponsor administers the documentation and responses?

This approach would be acceptable only if the sponsor's administration of the portal were transparent and open to scrutiny and/or audit.

Question 37: Is it essential that the online portal is a single website or could different websites (CAA, sponsor, consultation portal) be used for different aspects of the process?

Yes

Please give reasons for your answer.

All information must be on a single portal to allow ease of access for local stakeholders. The technical difficulties of a single portal do not seem insuperable, and indeed this is the approach within the planning system.

Question 38: Do you have any views on the CAA's analysis of the three options for an online portal, bearing in mind that the CAA will need to recover its costs through charges on those it regulates?

Yes

Please give reasons for your answer.

It is important that everything is accessible through a single portal. Whether it is bespoke or off-the-shelf is secondary as long as it is easy to operate and navigate for the general public.

Question 39: Is our assessment of the effects of the new process in Table D1 reasonable?

No

Please provide evidence of what you believe the effect will be on you, your organisation or on other stakeholders involved in the airspace change process, including estimates of the monetary costs and benefits where possible.

Table D1 gives no consideration at all to the additional impacts on individuals and the community groups which represent them.

It is important not only to consider the costs to sponsors and CAA in the proposed airspace change process, but also local stakeholders. To ensure effective scrutiny of proposed changes requires significant input from community groups and community representatives. These groups rely on the generosity and commitment of volunteers to assimilate information, attend meetings (often in working hours), and respond to consultations such as this. If we were to monetize the input of volunteers from Plane Wrong, including drawing on their professional expertise, it would run well into tens of thousands of pounds.

As a community organization, we have also had a series of direct costs associated with our work in challenging changes to Routes 3 and 4 at Gatwick Airport. These include legal advice and technical advice from independent airspace advisors in addition to incidental costs such as travel expenses and meeting room hire. To date, the cost to Plane Wrong of these services in relation to Routes 3 and 4 at Gatwick Airport has been in the order of £20,000.

In relation to legal and technical costs, these have been particularly important to Plane Wrong in developing insights and alternative options for Route 4 associated with the introduction of PRNAV. Without the observations from our independent airspace designer, it is not clear that GAL would have developed the modification to Route 4. We were able to procure these professional services based on the generosity of supporter donations. We are fortunate that we are in a relatively wealthy area that we have been able to fund raise where other communities may not be able to do so. Whilst GAL did offer to pay for the costs of our airspace designer, we declined as we felt that this would impact on our impartiality. As such, the CAA may consider establishing a funding stream to help local community groups and stakeholders to access the

advice they need to be able to provide effective scrutiny, understand the technical details and be able to clearly articulate responses to technical considerations.

Question 40: We are interested in our views on the additional costs in terms of time and resources that the proposed process will create for all parties. We are particularly interested in estimates of the monetary costs and benefits to sponsors of previous airspace changes and how these would have been affected by the CAA's proposed new process.

Please refer to response in Q39. The impacts to community groups should also be considered.