

Report of the CAA's Post Implementation Review of the implementation of RNAV-1 Standard Instrument Departures at Gatwick Airport

Annex 4: PIR Correspondence Assessment

Annex 4 to CAP 1346

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Acronyms

AMSL	Above Mean Sea Level
NATS	The group of companies including NATS (En Route) plc and NATS Services Limited
NPR	Noise Preferential Route
PIR	Post Implementation Review
PRNAV	Precision Area Navigation
RNAV-1	Area Navigation
SIDs	Standard Instrument Departures

The CAA's role

1. The CAA has a function to *'provide a focal point for receiving and responding to aircraft related environmental complaints from the general public'* as stipulated by the (then) Secretary of State for the Environment, Transport and the Regions in The Civil Aviation Authority (Air Navigation) Directions 2001 in exercise of the powers conferred by section 66(1) of the Transport Act 2000.
2. As part of this obligation the CAA received a significant number of comments from members of the public, and several organisations representing them, about the changes to departure arrangements at Gatwick Airport. Such organisations included parish councils, a number of representative organisations consisting of groups of residents and a solicitor writing on behalf of residents.
3. Although the changes to departure arrangements at Gatwick Airport were decided upon in August 2013, and implemented in November 2013, for various reasons the full effect of these changes may not have been felt by members of the public until the summer of 2014. These reasons include:
 1. 'RNAV-1 SIDs' (Area Navigation Standard Instrument Departures i.e. the new routes) were used alongside 'conventional SIDs' (i.e. the previous routes) until May 2014.
 2. The volume of traffic through Gatwick Airport is higher in the summer months.
 3. Any disturbance from aircraft can be more noticeable in the summer when more outdoor activities tend to take place.
4. The comments received by the CAA from the general public were not formally solicited by the CAA albeit, as set out above, the Secretary of State has given the CAA a function to receive such comments. Nevertheless, large numbers were being received into a variety of entry points at the CAA which did not, at that time, have structures designed to track, store and analyse comments of the volume being received.
5. At various public meetings concerning the changes at Gatwick Airport during Autumn 2014, the CAA was made aware that members of the public would be assisted if a specific CAA email account existed to enable them to communicate information and comments, and especially to voice objections and complaints, so that these could be taken into account by the CAA during this post implementation review (PIR). This led to the CAA setting up an email account in November 2014 as a single entry point to receive such material.
6. By setting up this email account the CAA was not engaging in a formal consultation process. This was explained on the CAA's website and in auto-

reply messages¹ to any correspondents who used the dedicated email account. Nevertheless, as the CAA was in receipt of these comments about the changes to departure arrangements at Gatwick Airport - albeit because of its function to receive environmental complaints from the general public - the existence of a significant number of objections and complaints to the changes was an important factor which has been taken into account during this PIR. It is the first time this sort of material has been considered in a PIR, as explained below in paragraph 21.

7. In order to ensure that the CAA could move from data collection to the data analysis phase of the PIR in a suitable time frame the email account remained open marginally longer than originally planned and closed during 6 January 2015. Closure of the email account was explained to members of the general public via the CAA's website and in auto-reply messages to any correspondents who wrote in to the email account. Communications received after the email account closed also received a message advising them of this and that the CAA was on the next steps of the PIR.² Hard copy correspondence received a letter in similar terms.

¹ "Thank you for your e-mail.

The CAA's decision to change the UK's airspace design to introduce RNAV SIDS at Gatwick was taken in August 2013. The change was however implemented in November 2013. After an airspace change the CAA's published process sets out that there will be a Post Implementation Review (PIR) of the airspace change. The purpose of the PIR is to determine whether the change has resulted in the expected impacts and benefits, or if not to understand why and to determine what action, if any, should be taken.

To consider this the CAA must be provided with relevant data by the airspace change proposer, in this case Gatwick Airport, for a representative period. The relevant data required includes all the information necessary to enable the CAA to assess the expected impacts and benefits in the context of the CAA's statutory obligations when managing the UK's airspace.

Any information contained in your e-mail related to the impact of the specifics of the Gatwick RNAV airspace change implemented in 2013 will be considered together with all the data collected for the purpose of carrying out the review.

A PIR process begins 12 months after an airspace change has been implemented and in this case Gatwick is just commencing the phase of the process under which it must gather together all the relevant data to enable the CAA to review whether the airspace change has had the expected impact and benefits. Any information provided to the CAA relevant to the impact of this airspace change submitted on or before 5 Jan 2015 will form part of the data that is considered as a whole under the PIR.

Mark Swan"

² "Thank you for your email concerning aircraft noise in airspace over your residential area, which you understand to be related to the introduction of new departure profiles supporting Gatwick Airport operations. New airspace structures are introduced in UK airspace through the Airspace Change Proposal process (<http://www.caa.co.uk/default.aspx?catid=2392&pagetype=90&pageid=16976>) and as part of that process a Post Implementation Review (PIR) is carried out by the CAA one year after the change has been implemented (<http://www.caa.co.uk/default.aspx?pageid=9137>).

In respect of the changes to departure arrangements at Gatwick Airport which were decided upon in August 2013 and implemented in November 2013, the PIR is ongoing.

In November 2014 the CAA recognised that many people wanted to provide comments for the CAA to take into account when carrying out that PIR. In order to facilitate both the tracking of those correspondence items, and the ability to properly take their contents into account, in November 2014 the

How the CAA processed the information it received from the general public as part of this PIR

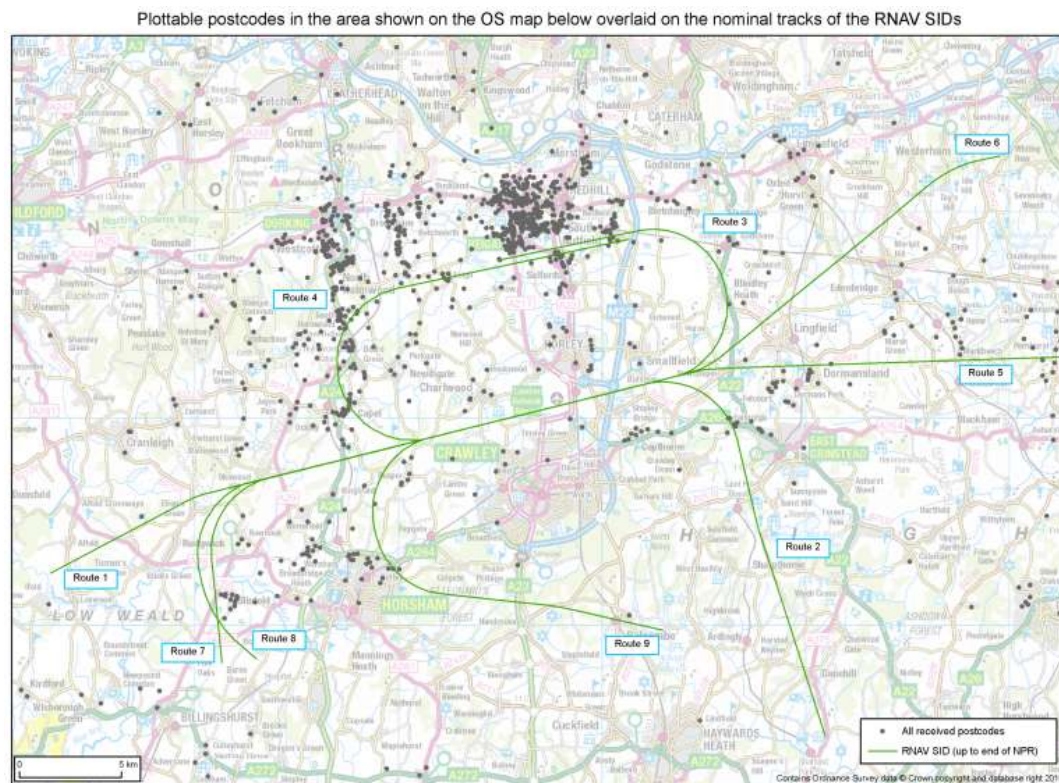
8. The contents of all emails sent to the dedicated email account, as well as other correspondence items received by the CAA up to 6 January 2015 which on their face related to this PIR, have been taken into account by the CAA as follows:
1. Every letter, e-mail, petition and submission has been read at least twice (before the CAA carried out the processes below).
 2. Sorting them, where possible, into 'postcode districts' to get an impression of where the correspondents were located. The CAA acknowledges that this process of sorting by location leaves some room for human error and subjective judgement was sometimes required in order to decide into which district to place a correspondence item particularly where the correspondent referred to multiple locations. Correspondents who had not provided any information at all about their location, and/or did not provide a full postcode, were not contacted by the CAA in order to request this information, but their correspondence was nevertheless taken into account without the geographic link.
 3. Plotting the location of all correspondents onto ordnance survey maps where a full postcode was provided. By doing this, the CAA got an impression of the location of correspondents relative to:
 - The nominal tracks of the RNAV-1 SIDs on all of the nine routes that changed (see below).³

CAA set up a specific e-mail account to receive comments that the CAA knew members of the public wanted to send to the CAA. In order that the CAA could move from the data collection to the data analysis phase of the PIR in a suitable time frame the e-mail account remained open only to 5 January 2015.

The data collection phase of the PIR has now finished and the CAA is in the process of analysing the information and data it has received. The specific e-mail account referred to above can no longer receive e-mails; and post 5 January 2015 PIR comments received, in other CAA general enquiries and complaints e-mail accounts, will be appropriately archived.

The CAA will publish its conclusions and its PIR report on the CAA website once the PIR is complete.”

³ Larger versions of these maps are available at the end of this report.

Figure 1 – The nominal tracks of the RNAV-1 SIDs

- Heat maps of all aircraft departures. One map shows the location of correspondents compared with departures between June – September 2013, and the other map shows the location of correspondents compared with departures between June – September 2014. The dark red areas indicate the greatest concentration of traffic.

Figure 2 – Location of correspondents plotted on Heat map of westerly aircraft departures (June – Sept 2013)

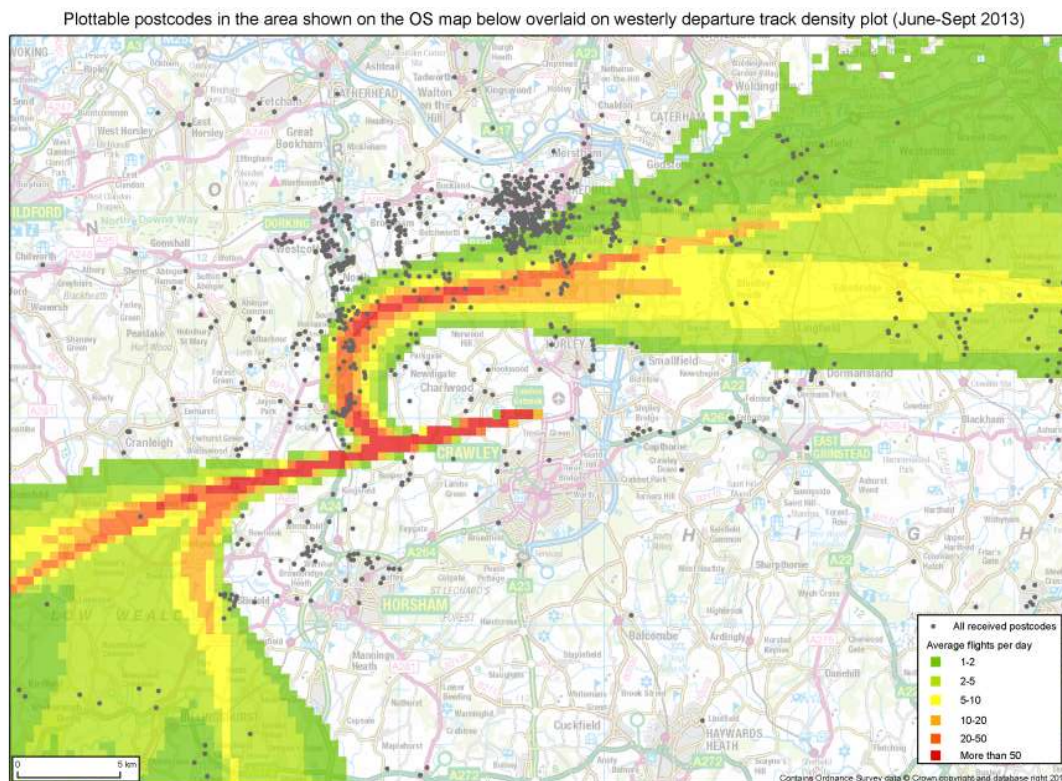


Figure 3 – Location of correspondents plotted on Heat map of westerly aircraft departures (June – Sept 2014)

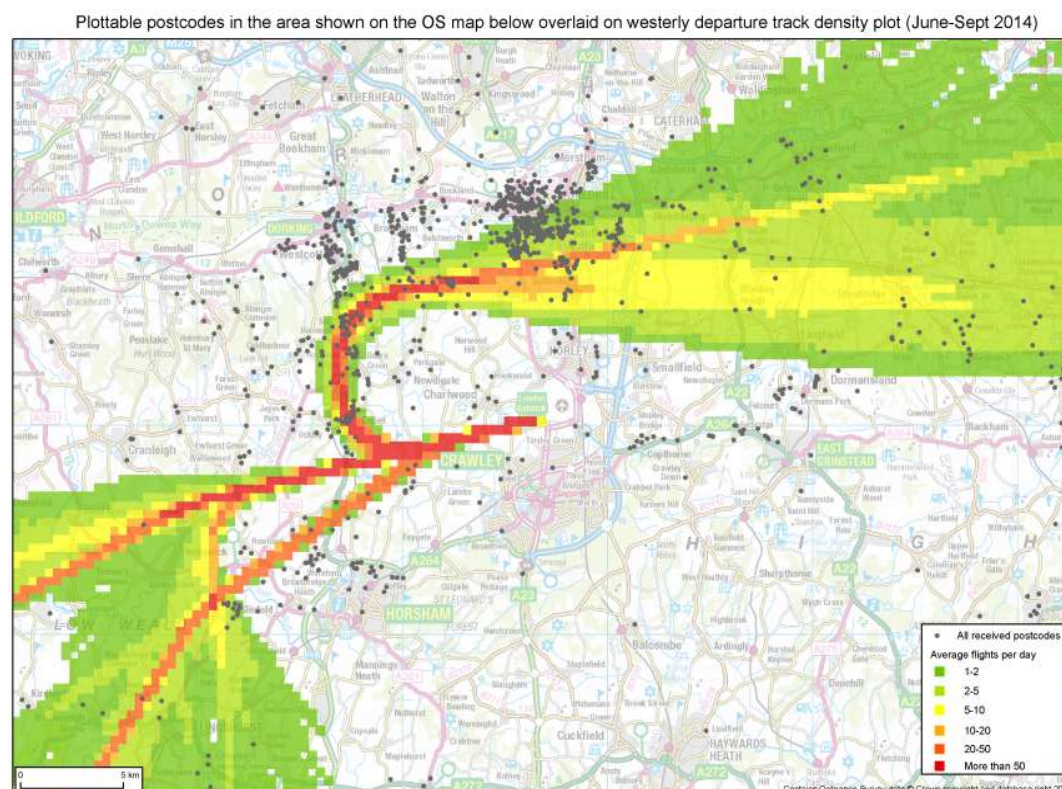


Figure 4 – Location of correspondents plotted on Heat map of easterly aircraft departures (June – Sept 2013)

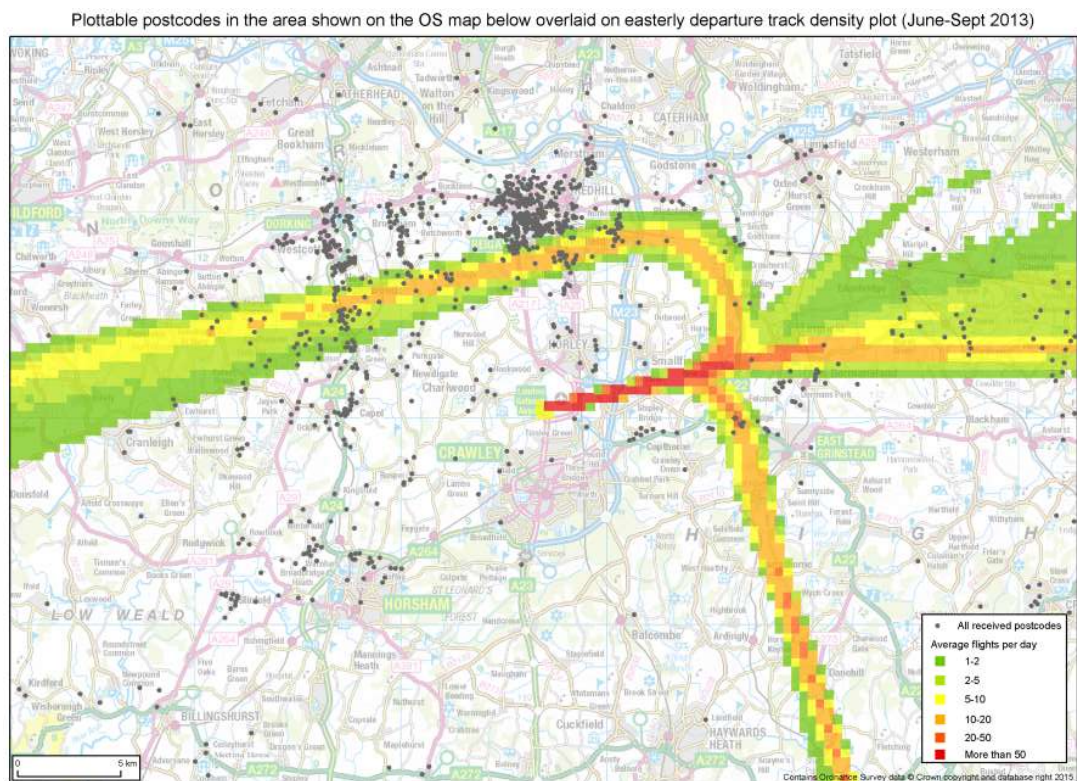


Figure 5 – Location of correspondents plotted on Heat map of easterly aircraft departures (June – Sept 2014)

