

Summary of the public consultation on the CAA's Strategic Plan for 2016-2021: Making Aviation Better

CAP 1401

Published by the Civil Aviation Authority, 2016

Civil Aviation Authority,
Aviation House,
Gatwick Airport South,
West Sussex,
RH6 0YR.

You can copy and use this text but please ensure you always use the most up to date version and use it in context so as not to be misleading, and credit the CAA.

First published 2016

Enquiries regarding the content of this publication should be addressed to: barbara.peratasmith@caa.co.uk

The latest version of this document is available in electronic format at www.caa.co.uk, where you may also register for e-mail notification of amendments.

Contents

Contents	3
Introduction	5
The purpose and structure of this document	5
The intended audience for this document	5
Overview of respondents.....	5
Chapter 1.....	7
The key themes and our responses	7
Environment	7
What was said	7
Our response	8
Safety	13
What was said	13
Our response	13
Choice, value and fair treatment	15
What was said	15
Our response	15
Better regulation	16
What was said	16
Our response	16
General logic of the strategy	17
What was said	17
Our response	17
Chapter 2.....	18
Detailed stakeholder feedback	18

Question 1: Our vision.....	18
Question 2: Our roles and purpose	19
Question 3: Our context	20
Question 4: Our guiding principles	21
Question 5: Our priorities	22
Question 6: Our change programme	24
Question 7: Innovation opportunities.....	25
Question 8: Our functions.....	26
Question 9: Our programmes.....	27
Question11: Consumer and public outcomes.....	30
Question 12: Other areas of work	31
Question 13: Final comments.....	32

Introduction

The purpose and structure of this document

1. The purpose of this paper is to set out in summary the responses we received to our consultation on our draft five-year strategic Plan and to set out how we have responded to what stakeholders have told us.

2. We have structured the paper as follows:

Chapter 1: The key themes and our responses. This chapter details how we have responded to the submissions received and how we have reflected this in the [final version of the Strategy](#) published in April 2016¹.

Chapter 2: Detailed stakeholder feedback. This chapter sets out in more detail who responded to the consultation and the main points made by stakeholders to each of the questions posed.

The intended audience for this document

3. This document is intended to be read by those who responded to the draft Strategic Plan as well as stakeholders who have an interest in our strategic priorities and activities.

Overview of respondents

4. We undertook a ten-week consultation on the Plan between 17 December 2015 and 19 February 2016; respondents were encouraged to let us know their views via an on-line questionnaire framed around a number of targeted questions relating to the draft content of the plan.
5. We received 180 responses to the consultation. Around half of those were largely incomplete (i.e. the responses included some personal details but

¹ The final version of the Strategy can be found at: <http://www.caa.co.uk/Our-work/Corporate-reports/Strategic-Plan/Our-five-year-strategic-plan/>

no views on the questions asked). We have not included these incomplete responses in the analysis.

6. Of the complete responses, we received submissions from the following stakeholders:

Members of the public, residents and the overflown:

- 70 from members of the public, residents and the overflown.

The aviation community:

- The Airport Operators Association (AOA) and Heathrow, Gatwick and Humberside airports,
- British Air Transport Association (BATA), FlyBe, Ryanair, Virgin Atlantic,
- Aeroassurance, ADS Aviation, Rolls Royce,
- NATS and the Guild of Air Traffic Controllers (GATCO),
- Guild of television cameramen.

NGOs:

- the Aviation Environment Federation (AEF).

7. Residents affected by airspace change constituted the largest group of respondents. The dominant high-level theme of these consultation responses was the environment and, more specifically, noise.

8. Industry responses were fewer in number and expressed views on a wider range of issues.

Chapter 1

The key themes and our responses

- 1.1 This chapter sets out the key themes raised by the consultation and how we have responded. Further detail of that feedback is provided in chapter 2.
- 1.2 Note that in structuring these themes, we have taken the strategic areas of Environment; Safety; Choice, Value and Fair Treatment; and Better Regulation.
- 1.3 As stated previously, the bulk of the responses to the consultation focused on the environment as a key theme. Responses on the other issues were fewer in number but expressed views on a wider range of issues. By and large, the responses were supportive of the main thrust of the Strategic Plan and agreed with the vision, our general principles and the strategic priorities. Against this generally favourable backdrop, a number of areas of improvement were suggested by industry stakeholders.

Environment

What was said

- 1.4 The views expressed by residents and members of the public who responded to the consultation focused almost entirely on the CAA's environmental objective and the related chapter of the Strategic Plan. An overwhelming majority is concerned that the environment does not sufficiently feature in the body of work proposed by the CAA.
- 1.5 Many people used the consultation as an opportunity to tell the CAA directly that they are unhappy with aviation noise, and to log their complaint without necessarily reflecting on the Strategic Plan. We have read these responses but do not intend to propose changes to our strategic plan where none were recommended.

- 1.6 Many suggested that to manage its environmental impacts, particularly noise, the aviation industry should be reduced or that expansion should be curtailed. It is noteworthy that this is at odds with the CAA's consumer focus and with the Government's policy framework within which we operate.
- 1.7 There were other points raised by respondents to which we can give greater consideration, which include recommendations as to objectives or work that they believe we should include in our Strategic Plan. The environmental recommendations raised by respondents (including those who were not members of the public, which includes those who work in commercial aviation) can be broadly grouped into the following four points:
- a. The CAA's objective should be to reduce the environmental impacts of aviation.
 - b. The CAA should do more to take proper account of those who experience aircraft noise.
 - c. A range of recommendations suggested specific actions the CAA might take to manage and/or reduce aviation noise.
 - d. The CAA should do more in its environmental strategy to manage other environmental impacts beyond noise, including carbon emissions, air quality, and the aviation industry's ability to adapt to climate change.
- 1.8 Whilst recognising the difficulties of acting unilaterally on the environment, respondents from the aviation community felt that there was potential for us to do more to capture and share international best practice.

Our response

- 1.9 When considering whether we can commit to any of the activities proposed by respondents, there are a number of factors that dictate our remit or restrict our ability to carry them out.
- **Regulatory powers and duties:** the statutory remit for all our work, including the environment, is determined by Parliament and the

Government, so we are limited in what we can proactively drive forward. For example:

- Carbon emission standards are set internationally by ICAO through economic instruments such as the Emission Trading Scheme (ETS) and the Global Market Based Measures (GMBM). We can continue to support the government where requested to develop policy, but we do not actively lobby.
- Noise metrics are agreed at government level, i.e. Leq of 57 DbA and surveys on noise attitudes, for example SoNA, are led by government department such as Defra.
- **Resource:** our staffing levels and our ability to charge those we regulate for the work we do is proportionate to our statutory remit.

1.10 With that context in mind, we respond to each of the themes (a-d) below.

Some respondents suggested that the CAA's objective should be to reduce the environmental impacts of aviation (a).

1.11 We do not propose changing our environmental objective, meaning that we do not intend to set ourselves the objective of reducing the environmental impacts of aviation.

1.12 As we stated in our strategic plan, one of the risk principles driving our strategy is that we will only act to protect the consumer and public from harm where there is a clear justification for CAA involvement and where we are able to make a real difference. The reality is that we have relatively specific powers in relation to the environment, with policy direction set by government. For example, in the area of airspace management, we have considerable power to make determinations on the relative merit of different designs, balancing a number of different factors including environmental impact. These decisions are taken guided by a framework established by the Government. In contrast, our powers to act to protect air quality and minimise greenhouse gas emissions are limited with most of the principal levers in the hands of others.

- 1.13 Notwithstanding our legal powers, our ability to make a difference unilaterally can also be limited by the international nature of the problem (for example on addressing global greenhouse gases) or the potential solutions (for instance low emissions engine design is now largely driven by international standards).
- 1.14 In summary, the CAA is not legally tasked with reducing the environmental impacts of the aviation industry overall, so this cannot be our objective. We are tasked with some environmental objectives specifically in our remit in airspace change, in which we make decisions about changes proposed to us. We are also tasked with helping consumers and the public gain environmental information that is of interest to them.
- 1.15 For these reasons, we intend to retain our proposed environmental objective: to help others take account of aviation's environmental impacts in their decision-making.

Some respondents suggested that the CAA should do more to take proper account of those who experience aircraft noise (b).

- 1.16 This point reflects one of the commitments the CAA made in the Strategic Plan, and we propose to keep this commitment.
- 1.17 We are able to undertake this activity specifically in relation to our role in airspace changes due to section 70 of the Transport Act 2000, which describes the factors we must take into account when making decisions about airspace changes. According to this legislation and related guidance from the Government, public views about noise should be taken into account when airspace is being designed, and noise must be mitigated as far as possible while achieving other local and national objectives.
- 1.18 In order to take proper account of those who experience aircraft noise when we make decisions about airspace changes, we are proposing major revisions to our airspace change decision-making process.