

Outcome of CAA stakeholder engagement on our draft Airspace Modernisation Strategy

CAP 1710



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Chapter 1

Stakeholder engagement

Introduction

- 1.1 The Government has tasked the CAA with preparing and maintaining a co-ordinated strategy and plan for the use of UK airspace for air navigation up to 2040, including for the modernisation of the use of such airspace.
- 1.2 Between 19 July and 10 September 2018 the CAA carried out a stakeholder engagement exercise to understand views on our new draft Airspace Modernisation Strategy responding to this requirement.
- 1.3 The draft Airspace Modernisation Strategy (CAP 1690), was published as part of the stakeholder engagement exercise.¹
- 1.4 We invited interested stakeholders to offer feedback on the draft document – including its approach and the initiatives it sets out as the primary ways to deliver modernisation – before it was finalised and delivered to the Secretary of State in December 2018.

Who responded to the engagement exercise?

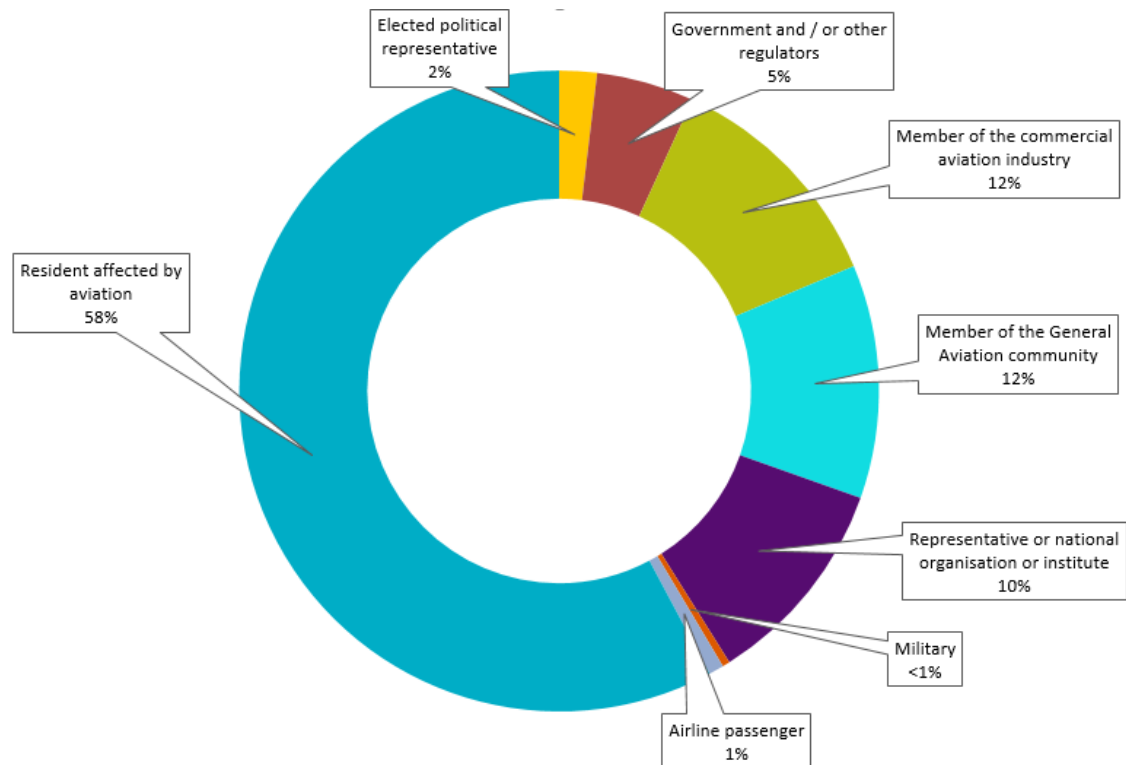
- 1.5 We had 263 responses in total, after removing duplicate official responses from the same organisation.
- 1.6 We asked respondents to self-categorise² in one of eight categories. Of the 263 responses:
 - the most responses were from residents affected by aviation (152), a number of whom were affiliated with a group who all submitted identical or very similar responses
 - 31 responses were from the commercial aviation industry, including four that were organisations relating to drones
 - 31 responses were from the General Aviation community
 - 28 responses were from representative or national organisations or institutes, some of which were local representative groups and one of which was a nationally owned airport
 - 13 responses were from government and/or other regulators, all except one being from county, borough or local councils
 - five responses were from elected political representatives, some of which were local authorities rather than individual politicians

¹ See <https://consultations.caa.co.uk/policy-development/draft-airspace-modernisation-strategy/> where the draft Airspace Modernisation Strategy document and responses can be viewed. In the interests of transparency, we have published all responses unless the respondent specifically asked us not to.

² We respected their self-categorisation and did not recategorise these responses.

- one response received was from the Military
- two respondents categorised themselves as passengers, one of whom noted they were also a resident affected by aviation.

Figure 1.1: Responses by category (% of total responses)

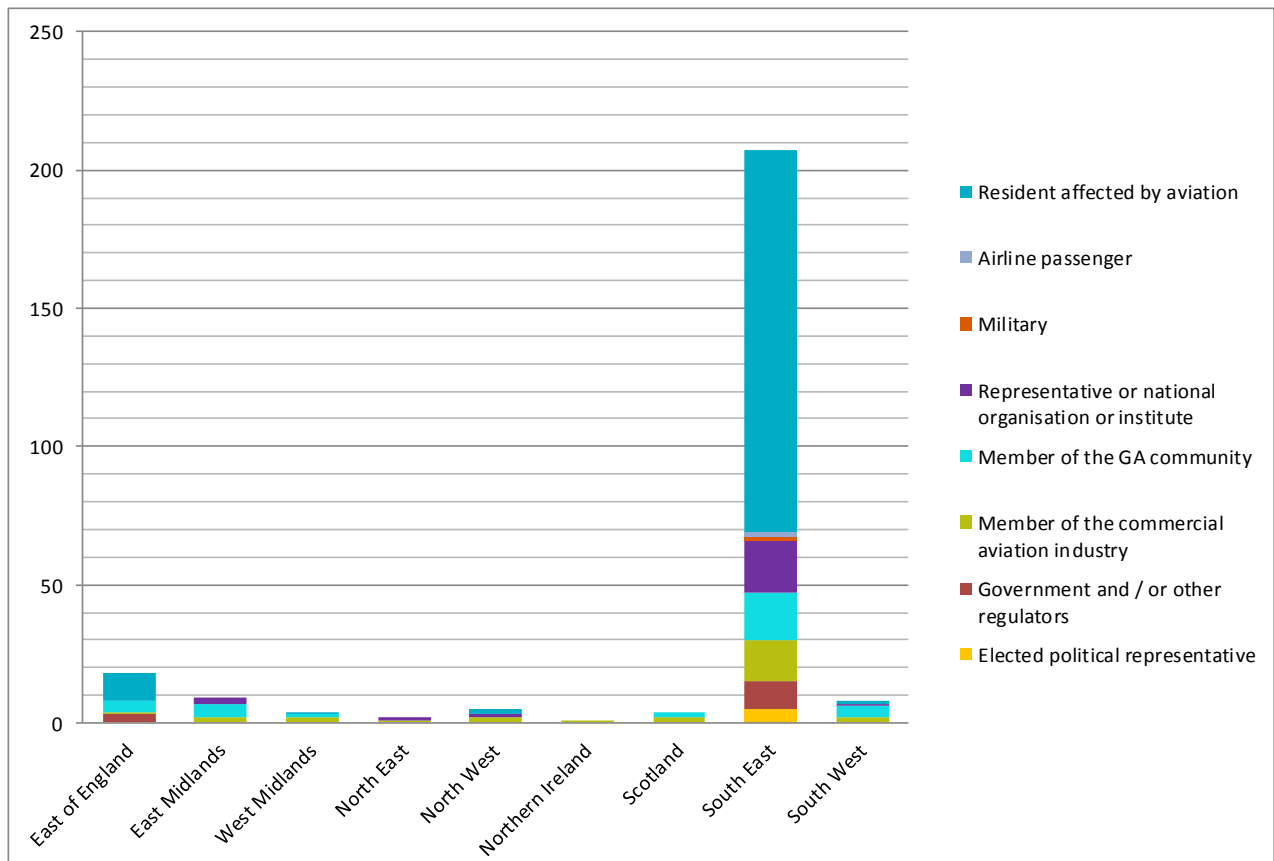


1.7 A full list of respondents appears at the end of this chapter.

Geographic spread of responses

1.8 Of the 263 responses, 207 (79%) identified themselves as based in the South East, 18 (7%) as East of England, nine (3%) as East Midlands and eight (3%) as South West. The remaining 21 respondents were spread between six other parts of the country, with between one and five responses from each. There were no respondents from Wales.

Figure 1.2: Category of respondent by geographic region



Note regarding stakeholder groups

- 1.9 Chapters 4 and 5 explain how we analysed the responses in depth using quantitative and qualitative approaches. We did not treat the engagement process as a referendum but as an opportunity to understand the sentiments and suggestions of different, sometimes polarised stakeholder groups. It was also a useful opportunity for any stakeholder to raise new ideas or suggestions with the CAA directly.

Questions

- 1.10 Of our six questions, five comprised both a 'closed' multiple-choice and an 'open' free-text element in which respondents could give reasons for their answers. One of the questions invited only an 'open' free-text response. The questions have been reproduced below.

Question 1: Do you agree with the overall approach taken in the strategy, as described here?

Yes Mostly No

Please provide additional comments [Free-text box]

Question 2: Has the CAA identified the right Government policies in this strategy?

Yes	Mostly, but some Government policies are not relevant	Mostly, but some existing Government policies are missing	No
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Please provide additional comments [Free-text box]

Question 3: Do you agree with the 14 initiatives set out in the strategy?

Yes	Mostly, but some initiatives are not relevant	Mostly, but some other initiatives are missing	No
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Please provide additional comments [Free-text box]

Question 4: Have we identified the right gaps? Are there any that we have not identified?

[Free-text box]

Question 5: Do you agree with our approach of asking those organisations tasked with delivering the initiatives to set out deployment plans to identify the means (resources) necessary?

Yes	No
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Please provide additional comments [Free-text box]

Question 6: The draft governance structure in this document was developed by the Department for Transport, CAA and NATS working together. Do you agree with the approach set out here?

Yes	Mostly	No
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Please provide additional comments [Free-text box]

Engagement exercise

- 1.11 On 19 July 2018 we contacted approximately 8,000 individuals and organisations directly about the stakeholder engagement exercise through our SkyWise alert system. We also sent out a targeted e-mail to more than 500 recipients on the same day, with a further follow-up reminder sent on 28 August 2018.
- 1.12 We made stakeholders aware of the exercise whenever we attended a relevant meeting, including the Community Discussion Forum, the Department for Transport's relevant focus group sessions, the General Aviation Partnership, and the Delivery Steering Group for the Future Airspace Strategy.
- 1.13 Although there was no requirement for us to invite responses on the draft document, we were pleased to have been able to provide this opportunity to stakeholders as part of our desire to be transparent and to listen to all views.

List of those responding by self-declared category

Member of the commercial aviation industry (31)*

Airports (11)

- Bristol Airport
- Cornwall Airport Newquay
- Gatwick Airport
- Heathrow Airport
- Highlands and Islands Airports
- Humberside International Airport
- London City Airport
- Manchester Airports Group
- Newcastle International Airport
- two airports or airport groups which preferred not to be identified

Airlines (3)

- British Airways
- Cathay Pacific
- Virgin Atlantic Airways

Consultancies (1)

- one consultancy which preferred not to be identified

Other (16)

- Airport Operators Association (AOA)
- Association of Remotely Piloted Aircraft Systems UK (ARPAS UK)
- Future Airspace Strategy Implementation South (FASI-S) Steering Group
- International Air Transport Association (IATA)
- NATS
- two individuals (one a commercial pilot)
- nine groups or individuals who preferred not to be identified

Member of the General Aviation community (31)

- British Microlight Aircraft Association (BMAA)
- 30 individuals

Resident affected by aviation (152)**

- Chertsey Society
- Heathrow Association for the Control of Aircraft Noise (HACAN)
- Luton And District Association for the Control of Aircraft Noise (LADACAN)
- Nutfield Conservation Society (NCS)
- Richmond Heathrow Campaign
- St Albans Quieter Skies (STAQS)
- 146 individuals

Government and/or other regulators (13)

- Chiltern District Council
- Essex County Council
- Hertfordshire County Council
- Kent County Council

- Local Authorities Aircraft Noise Council (LAANC)
- London Borough of Hounslow
- London Borough of Newham
- Royal Borough of Windsor and Maidenhead
- Runnymede Borough Council
- St Albans City & District Council
- Transport for London
- Warnham Parish Council
- One individual (not responding in an official capacity), who preferred not to be identified

Elected political representative (5)***

- Councillor David Hilton
- Salfords and Sidlow Parish Council
- Whitehall Town Council
- two councillors who preferred not to be identified

Representative or national organisation/institute (28)******Airport Consultative Committees (4)**

- Aberdeen International Airport Consultative Committee
- Doncaster Sheffield Airport Consultative Committee
- Gatwick Airport Consultative Committee (GATCOM)
- Liaison Group of UK Airports Consultative Committees (UKACCs)

Other (24)

- Aviation Communities Forum
- Aviation Environment Federation (AEF)
- Board of Airline Representatives (BAR UK)
- British Helicopter Association
- British Kite Flying Association
- British Parachute Association
- Communities Against Gatwick Noise and Emissions (CAGNE)
- Campaign to Protect Rural England: Hampshire Branch
- Future Airspace Strategy Industry Implementation Group (FASIIG)
- Guild of Air Traffic Control Officers (GATCO)
- General Aviation Alliance
- National Endowment for Science, Technology and the Arts (Nesta)
- Local Government Association
- Met Office
- Prestbury Parish Council
- Residents Against Aircraft Noise
- Royal Aeronautical Society
- Sustainable Aviation
- The Honourable Company of Air Pilots
- UK Flight Safety Committee
- one individual
- three groups which preferred not to be identified

Military (1)

- Ministry of Defence

Airline Passenger (2)

- two individuals

* Note that the commercial aviation industry category includes four respondents who are related to drones, and therefore could conceivably have been categorised as General Aviation community. We have not altered these categorisations.

** Note that LADACAN and the Chertsey Society declared themselves under the 'Resident affected by aviation' category. We have not altered these categorisations.

*** Note that Salfords and Sidlow Parish Council and Whitehall Town Council declared themselves as elected political representatives rather than Government and / or other regulators. We have not altered these categorisations.

**** Note that the General Aviation Alliance, CAGNE, Prestbury Town Council, an airport and a parish councillor declared themselves under the 'Representative or national organisation/institute' category. We have not altered these categorisations.

Chapter 2

Outcome of stakeholder engagement – a summary

Changes made to the CAA's Airspace Modernisation Strategy to address issues raised by respondents

- 2.1 Below is a summary of the changes we are making to the draft Airspace Modernisation Strategy. Key points from the responses to our engagement exercise are summarised in Chapters 3 to 5. We published all responses to the engagement exercise unless permission was withheld.

The joint objective for airspace modernisation

- 2.2 The CAA and Department for Transport have redrafted the joint objective for airspace modernisation. Ultimately the trade-offs between different airspace outcomes must be guided by public policy rather than the regulator. Public policy rests with our democratically elected Government, and the regulator should act in accordance with policy and legislation.

The governance structure

- 2.3 The Airspace Modernisation Strategy includes new sections and a supporting annex on the governance structure with more detail on the CAA and Department for Transport's role as co-sponsors. This also includes information about how the sponsors will commission organisations and ask organisations with a delivery role to demonstrate their impartiality and the evidence base supporting their work.
- 2.4 There is also more information on the Delivery Monitoring and Oversight (DMO) function, a role only briefly suggested in the draft document and which the Department for Transport has now asked the CAA to set up.
- 2.5 The governance architecture has been clarified, including setting out which delivery groups exist at this stage and where further information about membership can be found; the specific groups must remain flexible at this stage but will develop as the initiatives develop.

Ends

- 2.6 The latest position on the exit from the EU has been clarified where possible.
- 2.7 The strategy includes specific reference to the Government policy on making best use of existing infrastructure.
- 2.8 We have stated our intention to update the strategy in 2020, once the Government's Aviation Strategy is finalised (or later if the Aviation Strategy is published later). This will include reviewing every initiative to determine whether it is compatible with noise policy, if noise policy is changed through the Aviation Strategy. We may, at that point, strengthen the requirements or detail as to how initiatives should be delivered to comply with such noise policy.

- 2.9 We have clarified that, in circumstances where the CAA believes the policy framework or evidence base does not provide a clear solution to any trade-offs that arise between the delivery of airspace modernisation initiatives or the different airspace design changes identified in the forthcoming masterplan, we will request guidance from Government. Public policy ultimately rests with our democratically elected Government, and the regulator should act in accordance with policy and legislation.

Ways

- 2.10 A new initiative has been included to ensure SESAR³-compliant air traffic management (ATM) improvements to infrastructure, systems and procedures are captured.
- 2.11 Throughout the initiatives, changes have also been made to:
- clarify the role and requirements of the Ministry of Defence
 - reference the separate but related Industry Resilience Group initiatives that are underway
 - clarify what we mean by 'integration' and airspace structures including both controlled and uncontrolled airspace
 - set out further work for CAA to lead. For example, we will need to undertake further work and engagement in 2019 before we can offer further detail on how the initiatives concerning Part-ATS and electronic conspicuity will be realised. The same is true for the market structure for air traffic management solutions for drones
 - offer further information to address concerns received on spectrum-related resilience issues.

Means

- 2.12 The approach set out in Chapter 6 of the draft strategy has been confirmed – namely, that timelines and delivery plans must be set out by the organisations that will undertake the initiatives in order to deliver new airspace design, concepts and technologies.
- 2.13 The requirements for a design masterplan have been modified and stated in more detail. It has been made clear that the CAA and Department for Transport, acting as co-sponsors of airspace modernisation, intend to commission further work from NERL to produce a masterplan of upcoming airspace changes, which are necessary to, for example, increase airspace capacity, bring noise benefits, or release airspace for General Aviation or other airspace users. This masterplan would be underpinned by an obligation on NERL in its economic licence.

³ Single European Sky ATM Research.