

AIRSPACE CHANGE PROPOSAL CONSULTATION ASSESSMENT

Title of Airspace Change Proposal	NATS Departure Route Proposal at London Stansted Airport (LAMP Module A)
Change Sponsor	NATS
DAP Project Leader	██████████
Case Study commencement date	11 May 2015
Case Study report as at	24 September 2015 V3.1 (textual amendment following case study 23/09/2015)

Instructions

In providing a response for each question, please ensure that the 'Status' column is completed using the following options:

- Yes
- No
- Partially
- N/A

To aid the DAP Project Leader's efficient Project Management it may be useful that each question is also highlighted accordingly to illustrate what is resolved (Green), not resolved (Amber) or not compliant (Red) as part of the DAP Project Leader's efficient project management.

1.	Consultation Process	Status
1.1	<p>Is the following information complete and satisfactory?</p> <ul style="list-style-type: none"> ▪ A copy of the original proposal upon which consultation was conducted. ▪ A copy of all correspondence sent by the sponsor to consultees during consultation. ▪ A copy of all correspondence received by the sponsor from consultees during consultation. ▪ A referenced tabular summary record of consultation actions. ▪ Details of and reasons for any changes to the original proposal as a result of the consultation. ▪ Details of further consultation conducted on any revised proposal. <p>[Comments]</p> <p>Due to the nature of the proposal, it was decided that the Stansted Airport Consultative Committee (STACC) would be a suitable vehicle for consultation, with aviation interests being represented by NATMAC. The sponsor agreed to publicise the consultation to the public at the request of STACC. STAC provided a combined response to the consultation in the role of aviation stakeholder, whilst individual representative organisations responded separately as environmental stakeholders.</p>	<p>Yes</p> <p>Yes</p> <p>Yes</p> <p>Yes</p> <p>Yes</p> <p>Yes</p> <p>N/A</p>
1.2	<p>Were reasonable steps taken to ensure all necessary consultees actually received the information e.g. postal/e-mail/meeting fora?</p> <p>[Comments]</p> <p>The stakeholders identified were notified of the consultation via e-mail, whilst the sponsor undertook a number of TV/Radio interviews that led to 89 media items through Essex, Kent, Cambridgeshire, Suffolk and Hertfordshire.</p>	<p>Yes</p>
1.3	<p>What % of all operational consultees replied? (Include actual numbers).</p> <p>[Comments]</p> <p>Of the identified aviation stakeholder [REDACTED] there were 7 responses, 4 in support of the proposal, 2 'no objections' and 1 objection [REDACTED]. In addition, a further 5 aviation organisation responded to the consultation in support of the proposals.</p>	<p>(19%) 7</p>
1.4	<p>What % of all environmental consultees replied? (Include actual numbers).</p> <p>[Comments]</p> <p>There were 407 responses from local organisations/government and members of the public. Of those, there were 316 objections, 54 in support of the proposal, with the remainder either not objecting or not providing an opinion either way.</p>	<p>N/A</p>
1.5	<p>Were reasonable steps taken to ensure as much substantive feedback was obtained from the consultees e.g. through follow-up letters/phone calls?</p> <p>[Comments]</p>	<p>Yes</p>

	As there was a limited formal stakeholder list, the sponsor relied upon press releases during the consultation to raise awareness of the consultation.	
1.6	Have all objections to the change proposal been resolved (or sufficiently mitigated)? [Comments, with input from DAP Project Leader]	Yes
	The sponsor correctly identified the key themes from the consultation and provided mitigation statement/responses to them. To a great extent, the measure of whether these responses resolved/mitigated the issues raised will depend on the assessment of the environmental benefits identified by the sponsor and the interpretation of the Government's Air Navigation Guidance. The Guidance suggests that below 4000ft amsl, noise is the overriding factor; 4000-7000ft amsl noise/emissions are balanced with emissions being the overriding factor above 7000ft amsl. Therefore, overall environmental benefit will be a balance of emissions savings and the removal of overflight for one part of the population versus the doubling of overflight for another part of the population.	

Transparency Issues

LAMP 1 A Network Consultation

- The London Airspace Consultation (Part E) makes no mention of any changes concerning Stansted departures, although at the time of that consultation, it was accepted that Stansted Airport had not committed to LAMP. The feedback document to that network consultation also makes no reference to such changes.
- That said, the subsequent 'LAC Design Report following Consultation Feedback on Route Network (above 4000ft) over Sussex, Essex and Kent' para 5.48:

"As a separate part of LAMP Phase 1 we are removing this Stansted traffic flow so that instead of passing over the London City arrivals and over the Thames Estuary, they would fly east and turn south much later (see Ref 6). This would allow the London City departures to climb higher whilst over Essex. This earlier climb is not only good for reducing local impact, it is also vital to enable them to climb to at least 7,000ft so they can cross the point merge system for arrivals descending along the Thames Estuary."

Stansted Switch Consultation Document

- The justification for this airspace change is based on standalone environmental benefit. The link to changes at London City Airport is mentioned in para 5.14 of the consultation document, but infers that "changes being progressed at London City Airport" would exacerbate delays caused by maintaining aircraft on the DVR SID. The wording suggests that the changes at London City Airport are being progressed in any event, not that the Stansted proposal is an enabler to those changes. Moreover, a large part of the justification concerns the interaction of London City departures and London Heathrow departures/arrivals and this aspect was remarked upon by several stakeholders

Feedback Document

- Stakeholder feedback concerning the timing of the change is addressed in paras 5.37 and 5.38 of the Consultation Feedback Document:

5.37 Why don't you wait until Phase 2 of LAMP to make changes?

The introductory sections of the consultation document describe why the LAMP is phased, due to the complexity of the airspace, and why Phase 2 of the Stansted development would not be expected until 2019. The changes we are proposing now would enable the operational and environmental benefits discussed in the consultation material to be realised in the four year period leading up to that time (see para 4.3 for further detail on LAMP Phase 2).

5.38 *You are delaying changes at Gatwick so why don't you delay the changes for Stansted also?*

The changes being developed for Gatwick involve significant route realignments at low altitudes and so constitute a much more complex proposal. As a result of that complexity, Gatwick Airport Limited has decided to undertake additional analysis in order to better understand their options and next steps for the low altitude airspace.

Our proposal for Stansted does not involve new routes, is very much simpler in scope, and is supported by the airport. We believe that there is a clear case for change based on net benefits for both the environmental and operational performance.

- The status of the proposal as an enabler for the London City change is omitted as a reason for the timing of the change.

Formal Proposal

- Section 3 of the Formal Proposal states that the justification for the change is as stated in the Consultation Document; however, Section 1 of the proposal clearly states;

"It is an enabler for the implementation of Point Merge at London City Airport."

Analysis and Argument

- It is clear that the Stansted Switch proposal justification as consulted upon was based on the standalone premise of environmental benefit. Whilst a link to London City operations is acknowledged, related documentation from the sponsor indicates that it was concerned that any failure to implement other parts of LAMP would result in the proposal failing as part of a 'domino' effect; that argument is difficult to sustain as the sponsor maintains that, in any event, the change is justifiable on environmental grounds alone.
- The omission of reference to the proposal being an enabler the changes to London City departures raises issues of transparency in the consultation and actually weakens the mitigation over stakeholder concerns relating to the timing of the change, especially given the anticipated major changes to Stansted's departure/arrival profiles scheduled for LAMP 2.
- We need to assess whether the omission in the consultation would "make any difference to those being consulted", i.e. did the omission affect how effectively any interested party could participate in the consultation? Had the link to changes at London City been fully explained, it is reasonable to assume that a number of objections would have been received concerning the perceived increase in environmental impact along the CLN departure route undertaken to benefit a different airport. That would not, however, change the forecast impact of the change or prevented stakeholder from responding.
- This transparency issue was discussed with members of SARG and the OGC in December 2014, and additionally on 8 January 2015. It was agreed that whilst the transparency of why the change was proposed had not been completely clear in the consultation material, the impacts of the proposal were clear and therefore, at that time, the CAA accepted the validity of the consultation.
- The sponsor has correctly portrayed the environmental impact to stakeholders accurately and provided adequate means for them to

respond; therefore, the transparency issue, whilst undesirable, does not compromise the consultation.

Process Issues

A number of process issues were raised directly with SARG:

- **Clarity.** The issue was raised in connection with the technical level of detail of the proposal and a number of stakeholders considered that at no point did the consultation document state how many aircraft could be anticipated to use the CLN if the change was approved. Whilst it is acknowledged that technicality can be an issue, the nature of the subject makes some level of technical detail unavoidable. In this case, the consultation document is comparable with others assessed in recent times by a variety of sponsors. The number of flights forecast to use the CLN route on a daily basis is depicted in Figure 4 of the consultation document.
- **Publicity.** The sponsor undertook a number of TV and radio interviews, generating 38 newspaper articles and 47 online articles. Given that the Airspace Change Process generally relies on a stakeholder consultation, this level of publicity is considered appropriate.
- **Accessibility.** Whilst CAP 725 suggests that sponsors consider alternative methods of consultation such as placing consultation material at local libraries, the use of electronic media for consultation has become the de facto standard in recent years for government and public bodies. Similarly, a large number of public libraries have internet access facilities. The consultation media also depends on the nature of the change. In this case the method of consultation was deemed adequate at Framework Briefing.
- **Level of public engagement.** Given that the proposal did not propose any new departure routes, the CAA originally considered that the consultation could be conducted through the Stansted Airport Consultative Committee provided that it could be shown that its member adequately represented those areas overflowed by the departure routes concerned. However, the Consultative Committee requested that the consultation be widened to the general public. The sponsor agreed to that request undertaking the publicity activity detailed above.
- **Lack of Alternative Options.** Whilst CAP 725 guidance suggests that sponsors include a number of options during consultation and explain why options were discarded, this very much depends on the nature of the change being proposed. In this case, the sponsor did not propose to establish any new routes and identified a single option that yielded a (claimed) environmental benefit. Therefore the option of establishing a new route was clearly discounted in the consultation document as it was to be considered in the subsequent LAMP 2 development. Consequently, the only option considered was that which was proposed requiring a simple binary decision.
- **Consideration of Feedback.** A number of stakeholders complained that their feedback had been ignored. It should be noted, however, that the aim of the consultation associated with airspace change is to identify issues that may be pertinent to the development of the formal proposal, not to gauge the popularity of a particular proposal or undertake a referendum.
- **Duration.** CAP 725 Guidance suggests that sponsors consider extending consultations due to holiday periods etc, but sponsors are

	not bound to. The consultation ran for 12 weeks fulfilling CAA criteria.
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Outstanding Issues		
Serial	Issue	Action Required

Additional Compliance Requirements (to be satisfied by Change Sponsor)	
Serial	Requirement
	N/A

Recommendations	Yes/No
Does the Consultation Report and associated material meet SARG requirements?	Yes
The consultation report and associated material were comprehensive, well presented and meet SARG requirements	

General Summary

The key issue with the consultation was not the way in which the consultation was handled, it was the decision of NATS to relegate the link with the other LAMP Modules and justify the change on a standalone environmental benefit; that weakened the justification of the proposal to consultees, but because the impacts of the proposal had been adequately portrayed, this is not enough to trigger rejection of the consultation. In consultation terms, the major issue was the level of transparency exhibited by the sponsor in underplaying the importance of the module to the other LAMP proposals. In the end, the assessment came down to 2 questions:

- Where the impacts of the change correctly portrayed?
- Did the lack of transparency prevent stakeholders from responding to the consultation?

In conclusion, the impacts were accurately conveyed and the lack of transparency did not compromise the ability of stakeholders to respond to the consultation. As a consequence the consultation was assessed as adequate.

Comments

Observations

Consultation Assessment Sign-off/Approvals

	Name	Signature	Date
Consultation Assessment completed by (APCC Representative)			11 May 2015
Consultation Assessment approved by (Head of AR)			


DAP Comment/Approval

Approved

Name

SWAN.

Signature



Date

16 Oct 15

