

AIRSPACE CHANGE PROPOSAL CONSULTATION ASSESSMENT

Title of Airspace Change Proposal	LAMP 1a Module B (LCY SID and Arrival Replication)
Change Sponsor	London City Airport
SARG Project Leader	██████████
Case Study commencement date	18/05/2015
Case Study report as at	28/07/2015

Instructions
<p>In providing a response for each question, please ensure that the 'Status' column is completed using the following options:</p> <ul style="list-style-type: none">• Yes• No• Partially• N/A <p>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.</p>

Box

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>The RNAV replication portion of the proposal was progressed in accordance with the CAA's Policy Statement 'Guidance on PBN SID Replication for Conventional SID Replacement' dated 19 August 2013. It was decided that, in accordance with that policy, the Airport's Consultative Committee was an acceptable vehicle for conducting the consultation together with NATMAC and the airport users (airlines).</p> <p>The replication of the arrival routes does not fall under the above policy; therefore, the sponsor included the London Boroughs overflown by the arrival routes as additional consultees (e-mail from [REDACTED] to [REDACTED] 27/07/2015@1503 refers).</p> <p>The individual responses to the consultation were forwarded to the CAA by the sponsor in unprocessed form and all items have been individually read.</p>	<p>Yes</p> <p>Yes</p> <p>Yes</p> <p>Yes</p> <p>N/A</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>The LCACC received a verbal briefing on the proposal prior to the Consultation Document being sent to individual members and other stakeholders. In total there were 40 aviation stakeholders and 21 non-aviation stakeholders identified by the sponsor. In addition the sponsor issued press releases to raise awareness of the proposal and this generated responses from 483 members of the public and generated 25 media items.</p>	Yes
1.3	<p>What % of all operational consultees replied? (Include actual numbers).</p> <p>Sixteen aviation stakeholders responded to the consultation. Of those 11 supported the proposal (predominantly airlines), 5 had no objection or comment (predominantly NATMAC), whilst none objected</p>	40% (16)
1.4	<p>What % of all environmental consultees replied? (Include actual numbers).</p>	76% (16)

	Sixteen non-aviation stakeholders responded to the consultation. Of those, 3 supported the proposal, 3 had no objection/comment and 10 objected. In addition, 483 members of the public responded to the consultation with the vast majority (452) objecting to the proposal.	
1.5	Were reasonable steps taken to ensure as much substantive feedback was obtained from the consultees e.g. through follow-up letters/phone calls?	Yes
	Press releases were issued at the consultation mid-point and 2 weeks before it end. The response level for the identified stakeholders was relatively high.	
1.6	Have all objections to the change proposal been resolved (or sufficiently mitigated)?	Yes

The main areas of objection surrounded the issues of flightpath concentration, the lack of design options and the airport's failure to consider respite routes.

Concentration/Respite Routes. Government Guidance promotes concentration over dispersion, but allows for the establishment of respite routes where local circumstances permit. However, given the airspace constraints in the area caused by the interactions with London City's departure route with those of other airports, respite routes would not be feasible. Moreover, had respite routes been considered by the sponsor, it would result in new routes being established where they did not already exist. That would change the nature of the proposal from a replication to a larger and more complicated Airspace Change that was not the aim of the sponsor.

Lack of Design Options. Whilst CAP 725 indicates that a number of options should be presented in a consultation; however, In this case the aim was to replicate the existing conventional SIDs as closely as possible in accordance with the CAA's Policy Statement 'Guidance on PBN SID Replication for Conventional SID Replacement'. As a consequence, there is little scope to offer different design options. From the proposal document (Section 7), it is apparent that different coding options were considered in the sponsor's development of the SIDs, but this was solely aimed at providing the best replication of the existing conventional SIDs. Whilst 'Do nothing' remained an option, RNAV SIDs will be mandated in the airspace surrounding London in 2019.

Scope of Consultation. From first principles, the sponsor indicated that the aim of the proposal was to replicate existing conventional SIDs in accordance with the CAA's Policy Statement 'Guidance on PBN SID Replication for Conventional SID Replacement'. The Policy clearly identifies that that it is permissible to use an airport's consultative committee as a vehicle for consultation. Whilst this was unpopular with the vast majority of objectors, the sponsor conducted the consultation to the scope agreed at Framework Briefing and in accordance with the published Policy. A number of correspondents considered that a full public consultation with individuals being leafleted and a number of local representatives were of the opinion that the consultation should be rerun along those lines. In the event that the proposal had not been SID replications then the level of consultation would have been higher, but in any event would have still been run along the lines of a stakeholder consultation rather than a full public consultation.

Outstanding Issues		
Serial	Issue	Action Required
	N/A	

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

Recommendations	
Does the Consultation Report and associated material meet DAP requirements?	Yes/No
	Yes
<p>The majority of this proposal was progressed in accordance with the CAA's Policy Statement 'Guidance on PBN SID Replication for Conventional SID Replacement', the sponsor included additional consultees in order to discharge its responsibility to consult over the replication of arrival routes.</p> <p>✓ The consultation report, associated material and consultation activity met SARG requirements. The engagement undertaken by the sponsor resulted in 483 public responses that were considered as part of this assessment; these responses were reviewed in their original form in order to validate the assertions made by the sponsor in mitigation of the issues raised.</p>	

General Summary
<p>The proposal was a relatively straightforward SID replication progressed in accordance with extant CAA policy. Aviation stakeholders were generally in favour of the proposal, whilst environmental stakeholders and members of the public voiced most concern over the impact of flightpath concentration and a perceived lack of adequate consultation.</p>
Comments

Observations

Consultation Assessment Sign-off/Approvals

	Name	Signature	Date
Consultation Assessment completed by (Airspace Regulator (Coordination))	[Redacted]	[Redacted]	28/07/2015
Consultation Assessment approved by (Head of AR)	[Redacted]	[Redacted]	28/07/2015

GDSARG Comment/Approval

Approved subject to agreed conditions

Name	Signature	Date
M SWAN	[Handwritten Signature]	28/07/15