

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

CAP 1401



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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.

1.19 The new process will ensure that the views of those who experience aircraft noise are considered and addressed, the assessment and decision-making process are transparent, and the entire course of action is evidence-based. We will actively oversee how those industry bodies proposing airspace change engage with and address the concerns of residents who are currently or would be affected by noise as a result of the change. This does not mean that future airspace changes will be automatically weighed-up in favour of the overflow, but it will ensure transparency, accessibility and appropriate information exchange between the airspace change sponsor and the communities affected by noise. Further detail on our proposed changes to the airspace change process is available at www.caa.co.uk/Commercial-Industry/Airspace/.

A range of recommendations suggested specific actions the CAA might take to manage and/or reduce aviation noise (c).

- 1.20 Such recommendations included:
- Inform and influence the debate on technological advances so that they are as much in favour to the public and overflow communities that they are to consumers and the industry.
 - Reduce concentration and provide periods of respite to alleviate noise from afflicted communities.
 - An appropriate complaints procedure to allow members of the public to report grievances with aircraft noise.
 - A specific survey to be run in conjunction with the consumer tracker survey, to gather views from overflow communities on aviation environmental issues, such as noise, emissions and air quality.
- 1.21 Technological innovation is a complex issue, as it has to take into consideration multiple, at times conflicting views, from different stakeholders. For example, research into quieter engines can in the long term benefit the public, however, operational measures such as performance based navigation (PBN), are technological advances which improve efficiency and therefore reduce the fuel used and carbon emitted, but increase concentration and therefore noise.

1.22 To address the concerns raised around our limited environmental body of work we propose to carry out a review of how we implement the government's noise policy and the powers the government has set for us. We already have a commitment to undertake environmental research on night noise, noise restrictions and the impacts of noise technology. We will extend the work to include a review as to whether we could, or should, better use regulatory levers (for example, around setting noise metrics and conducting attitudes to noise surveys) to influence the debate more proactively. We are also conscious that whilst we have a duty to collect complaints about aircraft noise, we have no powers to take action over specific complaints. The Government is considering whether there should be strengthened framework for the management of aviation noise and the outcome of this work will clearly impact on this and a number of other areas.

Some respondents recommended that 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 (d).

1.23 Such recommendations included:

- Make aviation more resilient to climate change.
- Focus on reducing carbon emissions, for example with operational measures such as continuous climb, continuous descent, flying more precise routes etc.
- Participate in the debate around improving and maintaining local air quality.

1.24 As we have articulated in our Strategic Plan, we have reviewed our environmental work in light of Better Regulation principles. This means we can only commit to developing expertise and dedicating resource to work programmes that are fully aligned with our legislative responsibilities. As stated previously, we are limited in the scope of our duties and powers with regard to the environment, with our main focus being in the area of airspace change. We do have a duty to make information available on the

environment and we will continue to review the information we provide on environmental impacts, and consider whether there are opportunities for us to better deliver our information duty.

Safety

What was said

- 1.25 A smaller number of comments were made about the CAA's strategy for safety. Whilst a number of issues were raised, the following two issues were most prominent:
- a. The CAA should be more explicit in its Strategic Plan as to the link with the European aviation safety strategy.
 - b. The CAA should review what more we could do to protect the safety of groundhandling operators.

Our response

The CAA should be more explicit in its Strategic Plan as to the link with the European aviation safety strategy.

- 1.26 We believe that due to the cross-border nature of many of the risks, the European safety system requires a degree of central coordination and direction of activities along with a more flexible approach to allow new responsibilities and collaborative working. EASA is the only organisation that holds the bigger picture for European safety and we are supportive of the EASA and national aviation authorities (NAAs) working more closely together in partnership, accepting that there are some tasks that are simply better off being conducted by EASA than by the NAAs using a non-uniform approach.
- 1.27 In supporting the development of the European safety system, the CAA's current strategic model for this is a 'planetary system' with EASA at the centre orbited by the NAAs as planets linked to EASA by the Basic Regulation; the larger NAAs being able to support their own State

activities and supporting EASA in discharging their responsibilities both inside and outside the EU.

- 1.28 We have included further detail of this approach in the final version of the Strategic Plan.

The CAA should review what more we could do to protect the safety of groundhandling operators.

- 1.29 Groundhandling services include services relating to the refuelling; loading of baggage or cargo; passenger handling, catering or marshalling of aircraft. The way in which these services are provided clearly affects aviation safety. This is recognised by the European safety framework which places a number of requirements on participants.
- 1.30 We agree about the importance of groundhandler safety which is why we continue to commit resources on researching and managing risk in this area. Airlines must incorporate management of groundhandling services contracted to them in their Safety Management System (SMS). This means the airlines agreeing processes and procedures with the ground handler that comply with these legal standards, and these are audited frequently. In addition, there are a number of non-binding industry standards as well as best practice guidance in place. Airports also have to agree safety and service standards such as workplace safety and driving standards with service providers as part of the tenancy contract.
- 1.31 In addition, we seek to facilitate the identification of safety issues and the analysis of safety data through the multi-disciplined Civil Aviation Authority (CAA) / Industry Ground Handling Operations Safety Team (GHOST).
- 1.32 In all cases, we will continue to actively oversee how airlines and airports manage their own safety performance. We believe that the above framework provides for a high level of ground handling safety. However, we will continue to monitor the safety performance of the sector and seek to identify forward-looking risks in order to assure the safety of the sector.

Choice, value and fair treatment

What was said

1.33 One of the themes mentioned by industry respondents was the regulation of new airport capacity. Responses from both airlines and airports noted that whilst there were multiple references to the need for new capacity, they felt that the Strategic Plan could include more detail on how we intended to develop our regulatory approach. Furthermore, a number of respondents noted the importance of competition in delivering pro-consumer outcomes and airlines were keen that we continue to actively monitor the market power of airports in the South East.

Our response

1.34 We have strengthened our articulation of these roles in our final version of the strategy, noting the principles that will guide our economic regulation of new capacity.

1.35 In the event that the Government gives the green light to new runway capacity, we will need to balance a range of considerations, including how the pre-completion costs should be treated, how to incentivise delivery, and how to treat the legitimate costs of surface access and the mitigation of environmental impacts. On the recovery of the main construction and implementation costs of runway expansion, for example, we can best meet our duties at this time by setting out a broad framework of applicable regulatory principles rather than by specifying a detailed regulatory regime. In March 2015, we set out the following principles²:

- *risk should be allocated to those parties who can best manage it.*
- *commercial negotiations should be encouraged, even where substantial market power is present; and*
- *capacity can be paid for both before and/or after it opens.*

² [Economic regulation of new runway capacity](#) (CAP 1279).

- 1.36 We will continue to consult further on our plans when we believe it is in the users interests to do so and when more specific information is available on the plans for capacity expansion.
- 1.37 The pressure on constrained existing capacity and the increasing demand for travel will continue to place pressure on competition within the sector and its overall performance. We will continue to use our competition powers as granted under the Civil Aviation Act 2012 to monitor and enforce competition in the sector. Furthermore, we are interested in monitoring the reliability and delay arising from congested airspace and airports. In the final version of the Strategic Plan, we outline the work that we plan to do to research, and if necessary act to protect, the resilience of the overall system.

Better Regulation

What was said

- 1.38 Almost all industry stakeholders highlighted the importance of the CAA conforming with Better Regulation principles and being more active in their application. Some respondents suggested that the role of the Board could be strengthened to focus explicitly on performance against Better Regulation principles. The EC261/2004 Regulation was singled out by a number of airline respondents as an area where more should be done to rebalance the consumer and industry interest.

Our response

- 1.39 We are committed to following Better Regulation principles in all our work as well as supporting the Government's wider Better Regulation agenda which prioritises the removal of unnecessary regulation where possible and consistent with our duties (such as overseeing the safe operation of the sector). To help us take the right decisions, we will be open to stakeholder views on what we could be doing differently, and how possible regulatory actions (or inaction) might affect our stakeholders.

General logic of the strategy

What was said

- 1.40 Some respondents felt that more could be done to integrate the key programmes (now revised to “key strategies”) with the vision, strategic priorities and change programme areas. Furthermore, a number of stakeholders wished to see more information on resources so as to gauge the level of relative priority being given to each area.

Our response

- 1.41 We have sought to make our Strategic Plan as concise and simple as possible and welcome feedback about how we can communicate more clearly and effectively. We have responded to this feedback by cross-referencing our priority areas and key strategies where appropriate. We also recognise the desire from some stakeholders to see more detail on the resources to be applied in each of the areas. We have set out our priorities in the strategy and whilst we do not consider it appropriate to include resourcing detail, we will consider whether we make more resourcing information available as part of our annual business planning process.

Chapter 2

Detailed stakeholder feedback

- 2.1 This chapter sets out who responded to the different questions posed in the consultation and the main points that they made.

Question 1: Our vision

- 2.2 **We asked:** Do you broadly agree with our vision for how aviation might be made to work better now and in the future?

- 2.3 What we heard in response:

Public, residents and the overflown

- Tackling the environmental impacts of aviation should be a higher priority (35).
- The views of overflown communities and the noise impacts on those communities should be better taken into account in all decisions (25).
- Greater emphasis should be given to reducing the noise impacts of aviation on residents (25).
- The CAA is not impartial and its views are weighted towards the interests of the aviation community (10).
- Too much attention is given to the interests of consumers and not enough to those of the public (10).
- Benefits of new technology are acknowledged, but only for consumers and not overflown residents (5).
- More emphasis should be given to tackling climate change (5).

The aviation community

- Encouraging economic growth should be more of a priority for the CAA (2).

- The vision should be more explicit about its role in overseeing safety and security (2).
- The CAA should be doing more to promote regional airports (1).

NGOs

- The vision should acknowledge that aviation operates within environmental limits (1).

Question 2: Our roles and purpose

2.4 **We asked:** Do you agree with how we have described our roles and purpose (in the context of our statutory duties)?

2.5 **What we heard in response:**

Public, residents and the overflow

- There should be a more explicit recognition of the role of the CAA in addressing environmental impacts (35).
- Too high a priority is given to the consumers; the protection of the public (from noise) should be given the same priority as much as consumers and passengers (28).
- The CAA suffers from a conflict of interest arising from its duty to look after the interests of consumers, as well as protecting those who are afflicted by aircraft noise (15).
- The CAA is too close to the industry (14).

The aviation community

- The CAA has an essential role in influencing rules overseas which should be mentioned (2).
- The CAA should do more to share best practice across the industry (2).
- Whilst an outcome-based approach is beneficial in some instances a prescriptive approach is needed by industry so that it can plan (e.g. technology standards) (2).

- The CAA should be supporting the take-up of technology to benefit consumers (2).
- Want to see how the CAA's strategy fits with the EU aviation strategy (2).
- The CAA should stress its role in promoting economic growth (1).

NGOs

- The regulation of aviation noise should be given to an independent body (1).
- The CAA should act as a regulator and be prepared to be firm in the enforcement of rules where necessary (1).

Question 3: Our context

2.6 **We asked:** Do you agree with the description of our context, in particular the drivers for the next five years?

2.7 **What we heard in response:**

Public, residents and the overflow

- The CAA's accomplishments are focused on the benefits to the industry and the consumer and little attention has been given to benefits for the public (30).
- The CAA acknowledges that noise has become a significant issue, but the over flown are only briefly mentioned, suggesting that they are not a priority stakeholder (20).
- The environmental impact of aviation is poorly considered, in particular with regard to the need to meet worldwide and European emissions target (20).
- The level and distribution of aircraft noise is a key issue for the next five years, made worse by new technologies such as performance based navigation (PBN) (15).
- Greater reference should be made to the Future Airspace Strategy (FAS) (11).

The aviation community

- The key role of the CAA in influencing international outcomes should be stressed (4).
- The CAA should help to manage the risk that different international aviation authorities drive a divergence of technical standards (2).
- The changing market structure for airports in the South East should be reflected in the context (1).
- The need to address airport and airspace capacity shortages (including overseas) and promote economic growth are key drivers (1).
- The CAA should be careful about cutting staff numbers too far (1).

NGOs

- Environment should be considered a key driver for the next five years (1).

Question 4: Our guiding principles

2.8 **We asked:** Do you agree with our guiding principles?

2.9 **What we heard in response:**

Public, residents and the overflown

- The CAA's guiding principles suggest that the CAA is not directly responsible for anything (16).
- Our legislative duties are limiting our capacity to deliver in a number of areas, including the environment. This does not inspire confidence to the public, whom the CAA should protect (11).
- The CAA suffers from a conflict of interests and needs to work harder to act in a way which is independent from industry interests (5).

The aviation community

- Consistent with the risk principles, the CAA should be clearer about the risks for which it is accountable (4).
- Support for a cautious approach to regulation, trialling where necessary before any decision is taken on whether to intervene (2).
- It's important that the CAA is effectively resourced and that it learns from best practice (1).
- Industry personnel should be explicitly included amongst those that should be protected (1).

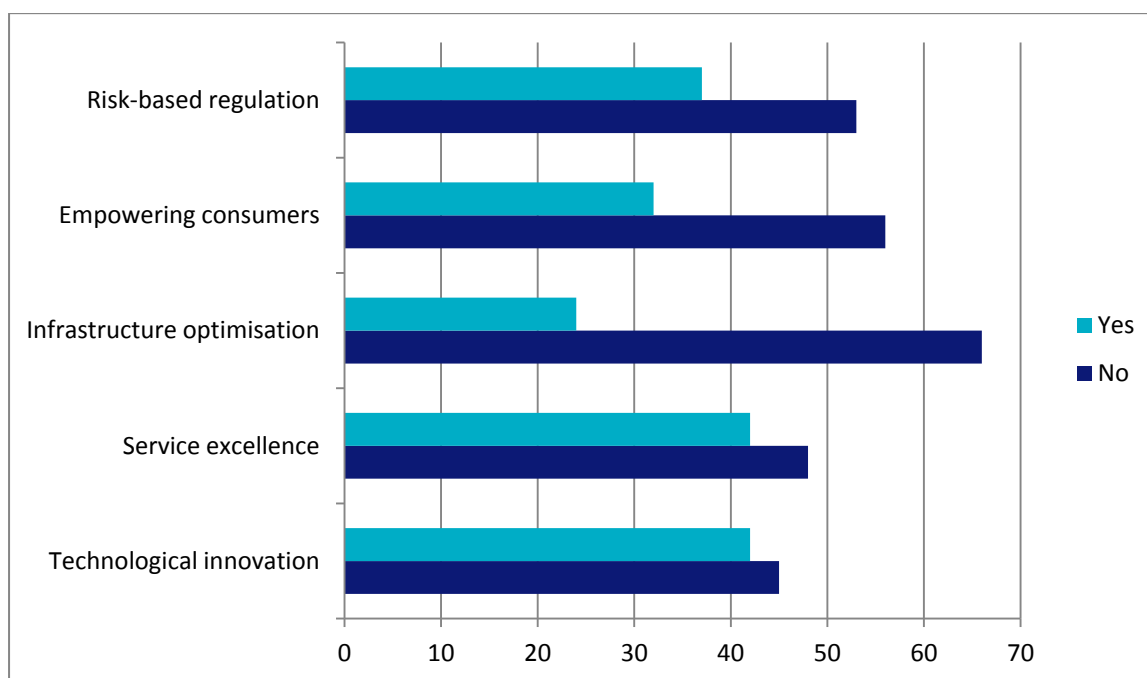
NGOs

- The CAA should have a principle that people are always put before business (1).

Question 5: Our priorities

2.10 **We asked:** Do you agree with our priorities as set out in the Plan and reproduced below?

2.11 **What we heard in response:**



Answer choices	Yes	No	Total
Risk-based regulation	41.11% 37	58.89% 53	90
Empowering consumers	36.36% 32	63.64% 56	88
Infrastructure optimisation	26.67% 24	73.33% 66	90
Service excellence	46.67% 42	53.33% 48	90
Technological innovation	48.28% 42	51.72% 45	87

Public, residents and the overflown

- Environmental protection should be a priority in its own right (28).
- **Risk based regulation:** Seems to prioritise cost reduction over outcomes (28).
- **Empowering consumers:** Aviation environmental consideration should be considered in isolation, not as part of this category, as the priorities of passengers and the public are different (8).
- **Infrastructure optimisation:** Section focuses on the benefits of new infrastructure for airports, airlines and consumers but residents are excluded. More work should also be done to maximise the capacity of existing capacity (8).
- **Service excellence:** Unilaterally focused on passengers and consumers of aviation services, with little or no mention of residents and communities (8).
- **Technological innovation:** The priority here appears to be reassuring aviation companies that CAA will limit its interventions (4).

The aviation community

- **Infrastructure optimisation:**
 - In terms of airspace change, noise is a critical consideration in airspace infrastructure optimisation but it is important that the

- outcome is a balance of airport resilience/capability, economic impact, environmental impact and passenger experience (1).
- Whilst infrastructure optimisation is a key priority, it appears to be focused on the south east of England and should also encompass regional airports (1).
 - **Technological innovation:** The CAA will need to provide the right framework to encourage innovation and that may take many forms and will often involve more than simply “not getting in the way” of innovation (1).
 - **Consumer Empowerment:** It was felt that although greater transparency of information could be beneficial, it can sometimes have anti-competitive consequences. Information remedies should therefore be carefully assessed so that they aid competition.

NGOs

- **Risk based regulation:** There should be a strong focus on the needs to protect the health and safety of the public in all decisions (1).
- **Infrastructure optimisation:** There should be an emphasis on gaining a better understanding of the real impacts of noise on affected communities (1).

Question 6: Our change programme

2.12 **We asked:** Do you agree with the key elements of our internal change programme?

2.13 **What we heard in response:**

Public, residents and the overflow

- **Better application of information and intelligence:** Here the CAA commits to an annual survey of consumer attitudes but there is no similar initiative to survey attitudes of residents and overflow communities (21).

- **Service excellence:** There is no mention of how the CAA intends to improve the service it provides to the public (including residents in overflowed communities) and its complaints process (13).
- **Communication and engagement:** There should be annual survey of public attitudes to noise similar to that carried out for consumers (21), the section should also reflect that different stakeholders require different communication and engagement approaches (5), and there should be more lay-representation in the CAA on key policy issues (5).
- **Information and intelligence:** The CAA should prioritise generating better information about noise impacts (10).

The aviation community

- **Communication and engagement:** The CAA should examine how it can involve industry better in its communication, including sharing best practice (4).

NGOs

- **Communication and engagement:** The CAA should engage in a fundamental review of how the airspace change process works, including how CAA colleagues engage with the public (1).

Question 7: Innovation opportunities

2.14 **We asked:** Are there innovation opportunities, including changes in regulatory approach, or ways of working that we should consider over the next five years that are not mentioned in the draft Strategic Plan?

2.15 **What we heard in response:**

Public, residents and the overflowed

- There should be a transfer of responsibility for regulating to aviation noise to an independent body separate to the CAA (25).

- The CAA should take full account of the feedback documented in the Helios report published on 8 December, the “Independent review of the Civil Aviation Authority’s Airspace Change Process” which reflected a number of concerns from a range of stakeholders about the current process (20).
- There should be a greater focus on better consultation with stakeholders, particularly the public (13).
- There should be a focus on presenting information in a way which lay people can understand (12).
- The CAA should give much greater weight to limiting the effects of aviation noise and its role in improving the environmental performance of the industry (5).
- Opportunities through technology to reduce the noise burden should be prioritised (2).

The aviation community

- A decision should be taken on how the CAA contributes to advanced data projects such as those being undertaken by EASA and the FAA to look at aviation safety (2).
- We should consider a league table for safety performance (2).
- There is an opportunity for the CAA to communicate more clearly how PBR is going to be applied to regulated entities (2).
- There would be benefit in improving the coherence of the different Strategic Plan documents (1).

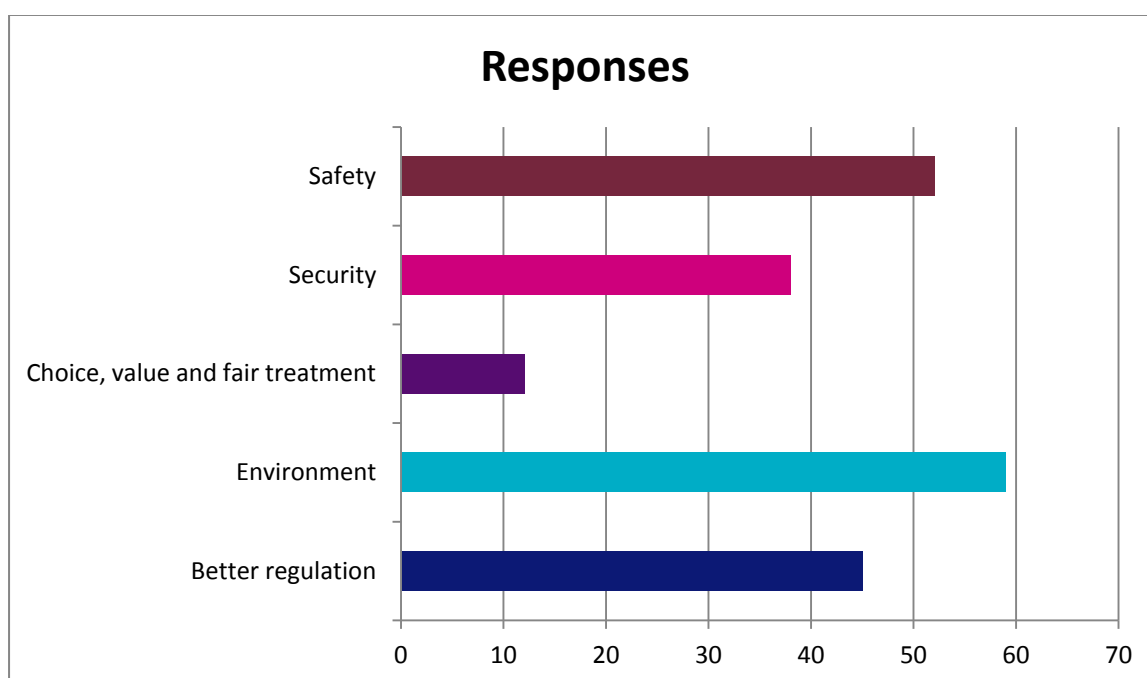
NGOs

- The CAA should rethink the assumption about accommodating aviation growth through more capacity and think about how it can do this within existing capacity (1).

Question 8: Our functions

2.16 **We asked:** Which of our organisational functions are most relevant to you?

2.17 What we heard in response:



Answer choices	Responses	
Safety	76.47%	52
Security	55.88%	38
Choice, value and fair treatment	17.65%	12
Environment	86.76%	59
Better regulation	66.18%	45
Total respondents: 68		

Question 9: Our programmes

2.18 **We asked:** For those functions selected above are the key programmes³ proposed broadly the right ones?

2.19 **What we heard in response:**

³ Note that in the final version of the strategy, 'key programmes' has been replaced with 'key strategies'.

Public, residents and the overflown

- **Safety:** There should be more of a focus on the safety concerns of residents and overflown communities, particularly with major airports being sited close to built-up areas (10).
- **Environment:** Disagree that the CAA does not have any formal powers to reduce the noise or environmental impact of aviation as these are set out under Section 70 of the Transport Act. Respondents tasked the CAA with, amongst other things, “the need to reduce, control and mitigate as far as possible, the environmental impacts of civil aircraft operations”. If CAA feels that it needs additional powers to fulfil its duties, it should identify what powers are necessary. As noted above, consideration should be given to having formal sanctions against the CAA for not performing its duties in this regard (10).
- **Better Regulation:** The CAA should be clear about how Better Regulation activities will benefit the public, in particular the overflown (10).

The aviation community

- **General:** The key activities should be better aligned to the CAA’s context (1).
- **Safety:**
 - Sharing of safety data should be done with care (1).
 - Performance-based regulation should be encouraged but it was noted that other parts of Europe may take longer to adopt this, leading to a potential two-tier regime also incorporating traditional “direct and inspect” approaches (1).
 - The Strategic Plan should describe how the CAA is aligned with the European Union’s Aviation Strategy and in particular EASA’s proposed changes to the basic regulation covering safety (1).
 - There should also be increased scrutiny of groundhandling services as a source of safety risk (1).

- **Security:** Applying performance-based regulation principles to security should be encouraged but there was concern about “knee-jerk” regulatory responses should granular information be shared and acted upon rashly (1).
- **Choice, value and fair treatment:**
 - The CAA should intervene to improve queuing times at immigration and luggage collection (1).
 - Investment in improving CAA processes will aid better information for decisions (for example, punctuality measurement at airports is based on out of date methodology and data capture) (1).
- **Environment:**
 - It is difficult for airports to trade-off national and local concerns about the environment. Less efficient operational outcomes might be needed to satisfy the needs of airports and residents (1).
 - Would support a review of how noise modelling services are offered by the CAA, including whether access under licence of key intellectual property might be allowed (1).
 - The lack of trust and transparency in decision-making is recognised by some airports and the establishment of community engagement boards with real influence over decision-making would help considerably (1).
- **Better Regulation:**
 - Support for deregulatory principles in the CAA’s work, though there might be a tendency to size regulatory work to the current level of staffing rather than focusing resources on identified problems (1).
 - The CAA should explore a one-in; two-out approach to deregulation (1).

NGOs

- Strong support for research into the environmental effects of aviation noise, including into questions such as the right metrics or the impact of exposure to aviation noise for the first time (1).
- Concern that the CAA is thinking about noise only in the context of infrastructure optimisation, suggesting that noise only matters in the context of aviation expansion. Environmental outcomes should be considered as an end in themselves (1).

Question 11: Consumer and public outcomes

2.20 **We asked:** For those selected above, do you agree with the consumer and public outcomes and our other proposed measures that are set out in the strategic plan?

2.21 **What we heard in response:**

Public, residents and the overflown

- The CAA should consider consumers, the public and the overflown as separate stakeholders to properly take into account the requirements of each group (30).
- Environmental outcomes are given insufficient weighting (3).

The aviation community

- The outcome measures should be anticipatory not lagging (2).
- We should seek to measure Just Culture (1).
- The structure of the emissions trading scheme currently discriminates against carriers that operate solely within the EU and a more equitable system should be a targeted outcome for the CAA (1).

NGOs

- Concern that decisions on infrastructure based on environmental impacts may be considered as a risk (1).

- Concern that too much reliance is placed on industry data when assessing their progress on climate change targets for example suggesting that a wider range of information should be relied upon to judge developments (1).

Question 12: Other areas of work

2.22 **We asked:** Over the next five years, are there any other significant areas that you believe we should be addressing but are not addressed in this Strategic Plan?

2.23 **What we heard in response:**

Public, residents and the overflow

- Need to have outcomes related to climate change performance (22).
- Greater enforcement of the aviation's compliance to environmental regulation, including emissions (CO₂) and local air quality, with more focus on research around the health effects of aviation noise and pollution (20).
- Environmental outcome should be given more attention (15).
- Our measurement of noise, and the noise metrics used should be based on real-world study (5).
- Take steps to rebuild our airports away from built up areas (3).

The aviation community

- Only introduce new technology once it has been thoroughly tested and allow for redundancy in systems (3).
- There should be a review of the safety performance of groundhandling services in the UK (2).
- There should be stronger alignment of the Strategy with EASA's European Plan for Aviation Safety (EPAS) (1).
- The regulator should work on the principle that a reduction in noise as a result of technological improvement should enable an increase in operations (1).

NGOs

- Reinforced the view that the CAA should reconsider its approach in relation to aviation growth, to consider whether demand growth should automatically be assumed to trigger further capacity provision (1).

Question 13: Final comments

2.24 **We asked:** Do you have any final comments in the Strategic Plan?

2.25 **What we heard in response:**

Public, residents and the overflown

- Environmental considerations are few and far between in the CAA's strategy and the public, communities and overflown residents should be treated as a stakeholder in their own right (10).
- The public has little confidence in the CAA's assertion that it aims to "reduce, control and mitigate as far as possible, the environmental impacts of civil aircraft operations". Some respondents suggested that a separate, independent body should be set up, dedicated to protecting the environment and the public alike from the impact of aviation (8).

The aviation community

- The consultation material reads well but would benefit from being better integrated (2).
- There should be more emphasis given to data (1);
- There should be more performance indicators for the internal business, including for example how the CAA is responding to EASA/ICAO oversight or AAIB recommendations (1).

NGOs

- No response.