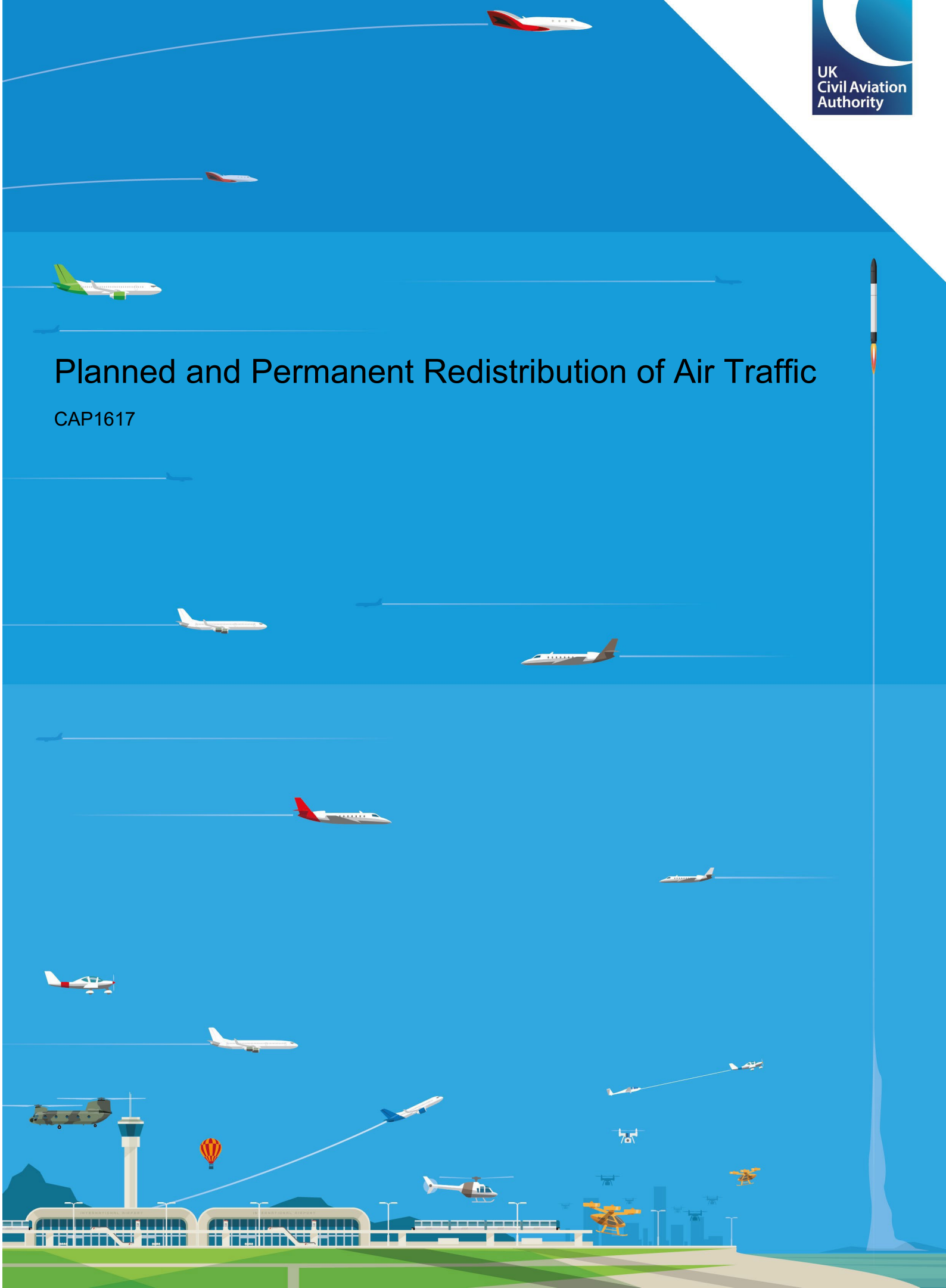
UK Civil Aviation Authority

Planned and Permanent Redistribution of Air Traffic

CAP1617



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Revision history

1. CAP 1617 was originally titled ‘Airspace Design: CAA representative decision templates’. It contained examples of the form that the CAA’s regulatory decision documents will take, and it was withdrawn on the 14th March 2023.

2. Following a review of the airspace change process, we decided to re-introduce CAP 1617 and update the contents to use it for a different purpose. The review has led to the separation of the various parts contained in the CAP 1616 airspace change process, and it was decided that Part 2: PPR: planned and permanent redistribution of air traffic would be published as CAP 1617.

3. The content of this publication is that which was presented in Part 2 and Appendix I of previous versions of CAP 1616. The text has been consolidated and rationalised to remove repetition, while minor administrative updates have been made to update references where necessary. No material changes have been made in terms of the process requirements.

4. The CAA is committed to undertaking a review of the planned and permanent redistribution of air traffic process as set out in this document in 2023.

Chapter 1

Introduction

Background

1.1 In October 2018, following an earlier consultation on airspace policy[1], the Government amended the Air Navigation Directions 2017[2] to give the CAA a decision-making role for a wholly new category of airspace change[3]. This category is known as a planned and permanent redistribution of air traffic through changes in air traffic control operational procedure. We refer to this as PPR for short.

1.2 Government policy is that certain types of PPR, known as a 'relevant PPR', with the potential to have a particular noise impact on the ground, should be subject to a CAA decision which:

- considers all the section 70 factors in the Transport Act 2000
- is based on a similar decision-making process as a change in airspace design, including appropriate consultation with those affected, and
- is subject to the Air Navigation Guidance 2017 on environmental objectives to the CAA[4] in the same way as that guidance applies to a proposed change in airspace design.
- is in accordance with the Airspace Modernisation Strategy.

1.3 In this guidance we set out this decision-making process for an air navigation service provider that wishes to make a change to its air traffic control operational procedures that is in scope of the definition of a relevant PPR. Although it will often be an airport operator that is seeking the change for operational reasons, only its air navigation service provider can propose a relevant PPR.

[1] https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/588186/uk-airspace-policy-a-framework-for-balanced-decisions-on-the-design-and-use-of-airspace-web-version.pdf

[2] The Civil Aviation Authority (Air Navigation) Directions 2017, as amended by The Civil Aviation Authority (Air Navigation) (Amendment) Directions 2018 and The Civil Aviation Authority (Air Navigation) (Amendment) Directions 2019, and referred to in this document as Air Navigation Directions 2017.

[3] https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/653801/consultation-response-on-uk-airspace-policy-web-version.pdf.

[4] Air Navigation Guidance 2017: Guidance to the CAA on its environmental objectives when carrying out its air navigation functions, and to the CAA and wider industry on airspace and noise management. https://www.gov.uk/government/publications/uk-air-navigation-guidance-2017 PPRs are not specifically mentioned in this guidance because it predates the amended Directions giving the CAA the decision-making function on PPRs. The guidance was amended in October 2019, but this does not directly affect the PPR process. https://www.caa.co.uk/uploadedFiles/CAA/Content/Standard_Content/Commercial_industry/Airspace/Airspace_change/20191030SoSTransporttoCAAAirNavigationAmendmenttoDirections2017.pdf

Air traffic control operational procedures

1.4 Air navigation service providers regularly amend their air traffic control operational procedures. This may be to implement continuous safety improvements in response to external changes made to the operating environment, to increase capacity in a fixed volume of airspace, to reduce delays, to enable more consistent and expeditious routings for aircraft, or for security reasons. These air traffic control operational procedures overlay the various features of the airspace design while keeping within the design's parameters. The operational procedures are the air navigation service provider's written instructions to its individual air traffic controllers as to how air traffic should be controlled in the portion of airspace for which that air navigation service provider is responsible. Air traffic controllers are continuously making decisions as to how to control individual aircraft. The air traffic control operational procedures form a framework within which each air traffic controller makes those individual aircraft-by-aircraft decisions.

1.5 Consequently the track over the ground taken by a given aircraft is a combined result of the airspace design, the air traffic control operational procedures and the individual expert decision of the air traffic controller on the day.

1.6 An example of an air traffic control operational procedure would be that governing the way an aircraft is controlled between the holding pattern (a predetermined manoeuvre while the aircraft is awaiting further instructions) and its approach to land. The air traffic control operational procedure may specify, for example, the distance from the runway by which the aircraft must be established and stable on the runway's Instrument Landing System. Although air traffic controllers are still making individual decisions that result in a safe and efficient flow of arriving aircraft, a change to the operational procedure could tend to change where aircraft fly over the ground before landing.

1.7 Another example, in this case affecting aircraft departing from an airport, could be an air traffic control operational procedure that governs which Standard Instrument Departure route is used, or which requires that aircraft be routinely instructed by air traffic controllers to divert from the published departure route in order to better manage the flow of traffic. In both cases these could change where aircraft fly over the ground.

How a PPR differs from a proposed change to the notified airspace design

1.8 The airspace change process described in CAP 1616 concerns proposed changes to the notified airspace design (such as blocks of controlled airspace and published flight procedures in the form of Standard Instrument Departure

routes and Standard Arrival Routes). These require a change to the Aeronautical Information Publication.

1.9 In contrast, a change to written air traffic control operational procedures involves no change to the notified airspace design. Prior to the introduction of the PPR process, such changes were (subject to the CAA's safety oversight) determined solely by the relevant air navigation service provider. Nevertheless, changes to those procedures could cause a redistribution of the tracks taken by aircraft over the ground even though the notified airspace design itself has remained unchanged.

Who is affected by a 'relevant PPR'?

1.10 The following stakeholders may be affected by the PPR process:

- communities affected by aviation noise or other environmental impacts, their representatives, councils and other elected representatives, and bodies with an interest in aviation's environmental impact
- air navigation service providers initiating a change in air traffic control operational procedure which potentially falls within scope of a relevant PPR
- airports to which the change in air traffic control operational procedure is related
- airspace users to the extent that a change in air traffic control operational procedure may affect them, for example airlines, other commercial operators and General Aviation (including sports, recreational, private transport, business aviation, flight training and air taxis); military aircraft are less likely to be affected, and operational procedure changes actually initiated by the military are exempt from the PPR process
- air navigation service providers and airports who may be impacted by a change in air traffic control operational procedure at a neighbouring airport
- users of air transport services, i.e. passengers and shippers, to the extent that a change allows the more efficient use of airspace or aircraft.

The seven-stage PPR process

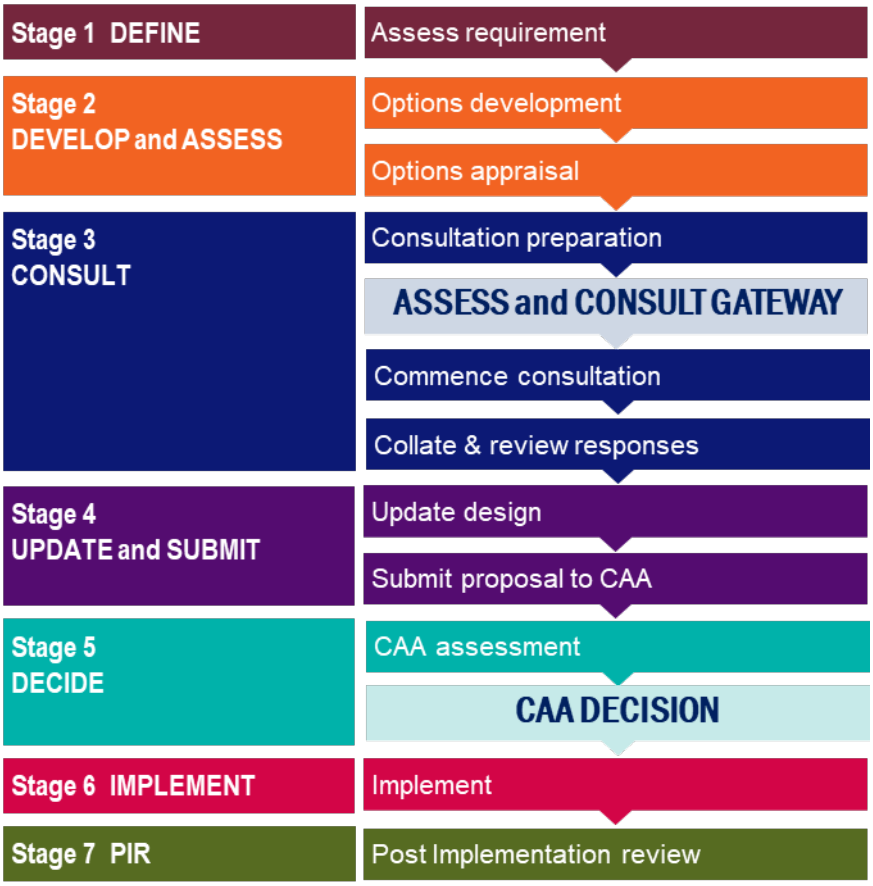
1.11 The decision-making process that applies to PPR proposals is based on the seven-stage airspace change process described in CAP 1616. To avoid unnecessary duplication of CAP 1616, we confine this publication to a general description of the PPR process, and the underlying assumption is that unless we state to the contrary, the detail of the PPR process is the same as in CAP 1616. Therefore, general references to the CAP 1616 airspace change process should be taken to mean the PPR process also, except where we highlight differences.

1.12 There are two important points to note:

- only certain types of PPR – known as a **relevant PPR** – require a CAA decision[5]; these are defined in the Air Navigation Directions
- only the air navigation service provider knows whether it is contemplating a change in air traffic control operational procedure, and therefore it must use an internal 'trigger' process that allows it to **identify** which changes must be put through the PPR decision-making process.

1.13 The definition of a relevant PPR is explained in our guidance on the regulatory process below. More detailed information on definitions, including examples, and on the air navigation service provider's internal trigger process is in Chapter 3, Identifying a PPR.

Figure 1 Overview of the PPR process



Definition of a PPR

Definition of PPR

1.14 Direction 2 of the Air Navigation Directions 2023 defines PPR as a planned and permanent redistribution of air traffic through changes in air traffic control

[5] Throughout this publication, wherever we say a proposed change is out of scope of the decision-making process, for clarity we are ignoring the CAA's usual safety oversight of the air navigation service provider.

operational procedure. Direction 2 defines 'planned and permanent' as meaning 'other than a day-to-day or at the time decision taken by an air traffic controller or other decision maker'.

Definition of a relevant PPR – the type of PPR that requires a CAA decision

1.15 An air navigation service provider must assess whether a proposal to amend air traffic control operational procedures might lead to a planned and permanent redistribution of air traffic, and if so whether it meets certain criteria set out in the Directions, in which case it is referred to as a 'relevant PPR'. These criteria are that the proposed PPR:

- falls within scope of one or more of **Types 1, 2 or 3**
    - Type 1. Lateral shift in flight track of more than a specified distance
    - Type 2. Redistribution between Standard Instrument Departure routes
    - Type 3. Change to Instrument Landing System joining point (on approach)

and

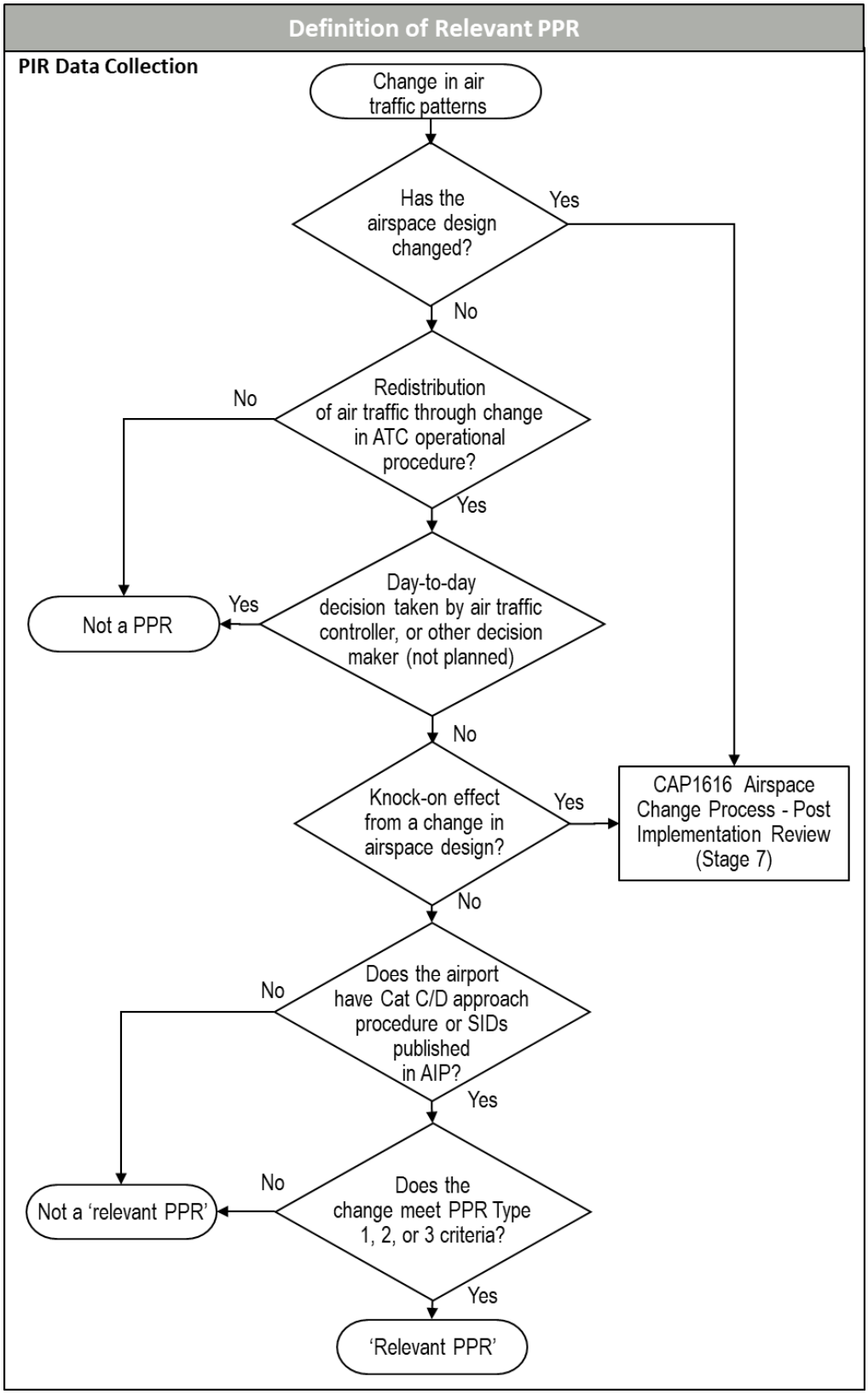
- relates to an airport in scope, i.e. which has a Category C or D (or both) approach landing procedure, and/or established Standard Instrument Departure routes published in the UK Aeronautical Information Publication.
- All these terms are explained in Chapter 3.

1.16 A PPR proposed by or on behalf of the Ministry of Defence is exempt from the process[6].

1.17 Only the subset of PPRs meeting these criteria require prior approval and are therefore in scope of the PPR decision-making process. In the interests of simplicity we have used the term 'PPR' and 'PPR process' throughout this document on the understanding that the regulatory process is only required for those PPRs meeting these criteria (i.e. relevant PPRs).

[6] Direction 9(7) of the Air Navigation Directions 2023.

Figure 2 Is change a 'Relevant PPR'?



Power to determine whether a proposed change is a relevant PPR

1.18 Paragraph 15 of the Schedule to the Air Navigation Directions says that if there is any doubt about whether a proposed PPR falls within Type 1, 2 or 3, the air

navigation service provider should consult the CAA. The CAA will determine whether or not the proposed PPR is a relevant PPR.

1.19 The mechanism for consulting the CAA is for the air navigation service provider to submit a Statement of Need through the airspace change portal. This will require the air navigation service provider to share modelling work with the CAA explaining the change, including anticipated tracks that aircraft will fly over the ground (for example, as described in more detail in our observations in Chapter 3). We may also require other additional information that allows us to consider the air navigation service provider's assessment and to make our determination (see Chapter 3).

1.20 The CAA's decision-making role is limited to Type 1, 2 or 3 PPRs, the criteria for which are based on anticipated outcomes. Thus we are required to assess, where requested, whether a proposed change in air traffic control operational procedure is anticipated to have the defined outcomes. We will consider the means and validity of the assessment by the air navigation service provider so that we can determine whether its proposal meets the Type 1, 2 or 3 criteria and therefore whether it requires a CAA decision as to whether it can be implemented.

1.21 Where the CAA concludes that an air navigation service provider has properly assessed that its proposal's anticipated outcomes do not meet any of the three criteria, we will confirm that the proposal can be implemented by the air navigation service provider without the need for a CAA PPR decision. This determination will be published by the CAA.

1.22 **If it transpires that, once the change is implemented, outcomes materialise over time that do in fact meet one or more of the Type 1, 2 or 3 criteria, the validity of the air navigation service provider's implementation of the air traffic control operational procedure is not affected.** The CAA has no statutory function to require the air navigation service provider to go through the PPR decision-making process retrospectively at that stage. However, if such a case were identified, the CAA would inform the Department for Transport who would, after careful consideration of the specific case, consider whether further action was needed.

UK airports potentially in scope of relevant PPR

1.23 Although this is the second of the two criteria for a relevant PPR, it is sensible to consider it first, since it may immediately remove a given change from the scope of the process.

1.24 In order to potentially qualify as a relevant PPR, the proposed PPR must relate to an airport which has:

- a Category C or D (or both) approach landing procedure[7], and/or
- established Standard Instrument Departure routes published in the UK Aeronautical Information Publication.

1.25 Around 50 UK airports are in scope of this definition, including the 30 biggest UK airports in terms of passenger numbers. The list of these airports could change over time, so the CAA regularly publishes it on its website[8]. If an airport is not on this list, then the PPR process cannot apply to the air traffic control operational procedures relating to it. The list does not include military airfields because a PPR proposed by or on behalf of the Ministry of Defence is exempt from the process.

Key principles of the PPR decision-making process

1.26 The 'Key principles' section in CAP 1616, Airspace Change Process also applies to the PPR decision-making process.

Roles and responsibilities

1.27 The 'Roles and responsibilities' section in CAP 1616, Airspace Change Process explains the roles and responsibilities of key participants involved in the airspace change process. These also apply to the PPR decision-making process, except that:

- for 'change sponsor' read 'air navigation service provider' – only an air navigation service provider can propose a PPR[9]
- there is no Public Evidence Session for a PPR proposal
- stakeholders impacted by the change will normally be consulted formally on a PPR proposal, but there may be fewer opportunities for earlier engagement because the PPR process does not have a 'design principles' stage.

Proposing a PPR

1.28 The impetus for a PPR could come from an airport operator rather than an air navigation service provider. For example, an airport operator may observe an issue arising from the vectoring procedures that an air navigation service provider is following, and may commission the air navigation service provider to alter those procedures to address the issue. In any such case, it is important that the airport operator and air navigation service provider work together.

[7] Aircraft approach category is a grouping of aircraft based on the speed at which they approach a runway for landing. Categories C and D typically relate to commercial or military jet aircraft.

[8] https://www.caa.co.uk/Commercial-industry/Airspace/Airspace-change/Airspace-Change/. If in doubt as to whether an airport is in scope, please contact the CAA at airspace.policy@caa.co.uk.

[9] This is because of the wording in the Air Navigation Directions 2023. Direction 9 directs the CAA to develop and publish procedures, and guidance on such procedures, for the development, consideration and determination of proposals for relevant PPRs as set out in Schedule 1. Such procedures must be proportionate and reflect published Government policy, and require an ANSP to refer a proposal for a relevant PPR to the CAA for approval before the PPR is implemented.

Consequently the Statement of Need form used to initiate the PPR process includes a check box for the air navigation service provider to indicate whether it has the full agreement of any relevant airport operator.

1.29 Smaller air navigation service providers may have fewer resources, including analytical software and staff, than a larger air navigation service provider. The CAA fully expects that in some cases a proposal will be made as a collaborative effort between the airport operator and air navigation service provider.

1.30 The airport operator may, for example, be better placed (in terms of experience and communication channels) than the air navigation service provider to carry out an effective consultation with relevant stakeholders, particularly local communities and their representatives. There is no reason why the airport operator should not lead on the consultation on the air navigation service provider's behalf.

1.31 The PPR application will still have to be owned and submitted by the air navigation service provider (who will act as the interface with the CAA, including on safety aspects), given that it is the operational procedures of the air navigation service provider which are driving the change. During the development phase of any given change, the air navigation service provider would have the knowledge and resource to take into account the consequential impacts of a change and influence the change content. Also, the regulatory focus is on the air navigation service provider from a safety perspective as well as PPR. This is why the Air Navigation Directions specify that it is the air navigation service provider which must apply to the CAA for approval and go through the PPR process.

1.32 It would be a matter for discussion between the air navigation service provider and the airport operator which organisation finances the work needed to bring about a change.

1.33 There is no reason why a local authority or community-led initiative for a change in air traffic control operational procedures could not give rise to a PPR proposal through a collaborative effort with the relevant air navigation service provider and airport operator. But for the reasons stated above, the air navigation service provider would remain the proposer of the change.

Gateway sign-offs

1.34 The PPR process uses a gateway procedure as described in CAP 1616, Airspace Change Process. At each gateway, the CAA will check that the necessary process has been followed up to that point, and that all necessary documentation has been produced and published where appropriate. The CAA commits to internal gateway meetings according to a published schedule, with deadlines for air navigation service providers to submit the required documents in advance agreed on a case-by-case basis.

1.35 The PPR process has two gateways. The first is known as the 'Assess and consult' gateway, which takes place during Stage 3 to ensure that the necessary process up to that point has been completed. The second is the 'Decide' gateway after Stage 5.

Transparency and stakeholder engagement

1.36 Prime objectives of the PPR process are that it is as transparent as possible and that the air navigation service provider must consider the impacts on others and engage with them appropriately about the implications of those impacts. The same principles apply as described in CAP 1616, Airspace Change Process.

Safety assessment

1.37 The 'Safety assessment' section in CAP 1616, Airspace Change Process also applies to the PPR decision-making process.

Scaling the PPR process

1.38 The PPR process does not have formal scaling categories like Level 1 and Level 2, because the definition of a relevant PPR is already drawn quite narrowly and only changes with the potential to alter traffic patterns below 7,000 feet will be in scope. The PPR process is significantly shorter (both in estimated timescales and process stages) than that for a Level 1 change to the notified airspace design. Although the impacts of a PPR proposal – i.e. a change to air traffic control operational procedures – and of a Level 1 change to the notified airspace design could potentially be similar, the PPR proposal will generally be more specific, with fewer design options.

1.39 However, the way a relevant PPR has been defined means that it is still possible for a relevant PPR – i.e. one that requires CAA approval through the PPR process – not to impact an inhabited area, for example, where the change is over the sea. In the airspace change process, such a proposal would be likely to be scaled as a 'Level 2', which significantly reduces the process requirements. To address this the PPR process is, to a large extent, self-scaling.

1.40 An air navigation service provider is required by the Directions (because the Directions require the Air Navigation Guidance 2017 to be applied to relevant PPR proposals) to undertake an options appraisal. This evidence base determines the scope of the impact, and must be used by the air navigation service provider when it develops its consultation strategy. This further builds in a general principle of scaling into the process. For example, an airport with less traffic will have lesser impacts, and an airport with fewer local communities will have fewer people to consult.

1.41 The number of stakeholders potentially affected by a proposed PPR change will determine how extensive a consultation must be. This is the same principle as

applies throughout the process for proposed changes to the notified airspace design, which requires change sponsors to develop a consultation strategy that ensures they are targeting the right audience, communicating in a way that suits that audience and giving them the opportunity to make informative, valuable contributions to the proposal's development.

1.42 This in turn reduces the resources required to run the consultation. If the impacts are benign then the consultation need not be extensive, could be shortened in length, and so on.

1.43 It is also important that a PPR proposal that is generally beneficial to and supported by overflown communities because it reduces noise impacts, or one that reduces emissions or improves network performance with minimal adverse impacts, should not be impeded by unnecessary laborious process. Similarly where a change is mandated by regulation. It is not possible simply to dispense with consultation altogether, the point of which is to establish who is affected as well as how, and to give them the opportunity to respond with their views, including positive views, and point out anything that has been missed before any decisions have been made. But providing there is proper provision of the necessary information and appropriate consultation, the CAA will consider proposals to scale the consultation process. The same approach would apply as set out in CAP 1616f, Guidance on Airspace Change Process for Permanent Airspace Change Proposals.

1.44 What is key is that the impacts are properly assessed. For example, a change optimising airspace use or making better use of technology may reduce delays and increase resilience to disruption, but it could also result in more flights and a worsened noise impact. It is the CAA's job to assess these impacts against our obligations under the Air Navigation Directions and section 70 of the Transport Act 2000.

1.45 Schedule 1 to the Air Navigation Directions states that the definition of a relevant PPR is designed to capture only air traffic control operational procedures that relate to airports at which large commercial air transport and most business jets operate. It does not capture aerodromes or airports used only by small non-commercial aircraft. However, it is possible that a change in air traffic control operational procedure at an airport in scope of a relevant PPR could solely affect a few movements of lighter General Aviation aircraft (such as sports, recreational and private flying). Where the anticipated impact is low, we will discuss appropriate scaling of such proposals, for example for the options development and consultation stages.

Applying the Air Navigation Guidance to a relevant PPR

1.46 Direction 9(2)(a) of the Air Navigation Directions requires that the CAA's decision-making process for relevant PPRs must be proportionate and reflect

published Government policy. Paragraph 16 of Schedule 1 to the Air Navigation Directions says that in accordance with section 70(2)(d) of the Transport Act 2000[10], the CAA should take account of the Air Navigation Guidance 2017[11] when carrying out its PPR functions, and that in particular, the CAA should apply to its PPR functions the guidance that applies to its (existing) function to consider whether to approve permanent changes to the notified airspace design. For this reason, options analysis and the use of WebTAG to appraise those options form part of the PPR process, as they do for the process that applies to proposals to change the notified airspace design.

Urgent national security or safety-critical changes

1.47 It is essential that where there is an urgent, overriding national security or safety consideration, a change in air traffic control operational procedure is implemented as soon as possible without first having to go through the PPR process. In such cases, an air navigation service provider implements a Temporary Operating Instruction immediately, subject to assessment through its safety management system, and submits it in the usual way to the CAA[12].

1.48 An urgent, overriding national security or safety consideration in this context is defined as a PPR which:

- is required to overcome an identified threat to national security, or
- is required immediately to rectify an identified safety or security weakness within an existing airspace structure or within an existing air traffic control operational procedure.

1.49 Safety-critical changes could be more prevalent for PPR proposals than for changes to the notified airspace design, because the driver for a change in air traffic control operational procedure is often to maintain safety standards, perhaps in reaction to some external change.

1.50 However, in order to avoid undermining the process overall, the air navigation service provider still needs to identify whether the change in question falls in scope of a relevant PPR, in which case it would be required to follow the PPR process. If this seems likely, the air navigation service provider must:

- notify the CAA's Airspace Regulation team within five working days of the Temporary Operating Instruction being issued

[10] This part of section 70(2) says: "The CAA must exercise its air navigation functions in the manner it thinks best calculated […] (d) to take account of any guidance on environmental objectives given to the CAA by the Secretary of State after the coming into force of this section."

[11] Air Navigation Guidance 2017: Guidance to the CAA on its environmental objectives when carrying out its air navigation functions, and to the CAA and wider industry on airspace and noise management. https://www.gov.uk/government/publications/uk-air-navigation-guidance-2017

[12] The change management process for air navigation service providers is set out on the CAA's website. https://www.caa.co.uk/Commercial-industry/Airspace/Air-traffic-control/Air-navigation-services/Certification-and-designation/Change-management-and-change-notification-process/

- submit a Statement of Need to the CAA within four weeks of the Temporary Operating Instruction being issued.

Proposals which meet the criteria for more than one type of relevant PPR

1.51 Some proposals may take the form of a package of air traffic control operational procedure changes. In such cases we will consider the package of PPR proposals together as one proposal from a single air navigation service provider. If a proposal meets the criteria for more than one type of relevant PPR, it makes no difference to the process, which is the same for each type of PPR.

Relevant PPR caused by a change to the notified airspace design or other knock-on effects

1.52 Where a proposed change to the notified airspace design will require a change in air traffic control operational procedures which is within scope of the definition of a relevant PPR, the changes must be proposed together as a package. The proposed change in air traffic control operational procedures must form part of the proposal for the change to the notified airspace design. Because a sponsor of a change to the notified airspace design must identify the impacts on other aviation stakeholders (specifically, that is airspace users, air navigation service providers and airport operators only) and engage with them early on as part of the airspace change process (as well as formal consultation later on), we expect the airport operator or air navigation service provider experiencing the PPR change to be involved in this process.

1.53 Therefore where such a package of proposals alters the notified design of airspace and air traffic control operational procedures constituting a relevant PPR, the change sponsor submits one combined proposal and follows the relevant process for a Level 1 or Level 2 change in CAP 1616, Airspace Change Process. (The only exception to this is where the change to notified airspace design is administrative in nature, in which case the air navigation service provider must separately make a PPR proposal, following the PPR process).

1.54 It is also conceivable that a relevant PPR (probably a lateral-shift, Type 1 change) could require a change in air traffic control operational procedures elsewhere. Again the air navigation service provider must identify the impacts on other aviation stakeholders early on and engage with them as part of the PPR process. This scenario may require separate PPR proposals from each air navigation service provider. When considering these related PPRs the CAA will want to consider the cumulative effects before making its decisions.

1.55 From an environmental perspective, assessment of the cumulative effects of a proposed package of changes is discussed in CAP 1616i, Environmental Assessment Requirements and Guidance for Airspace Change Proposals;

options appraisal would follow CAP 1616, Airspace Change Process in the usual way. The cumulative effects on communities overflown by more than one airport or indeed of multiple changes on any stakeholders is not a PPR-specific issue.

1.56 Not all PPRs generated in this way might become apparent immediately. A change elsewhere may have knock-on effects that requires changes in air traffic control operational procedure at a different airport and therefore potentially by a different air navigation service provider. We cannot cover every eventuality in this document, but the CAA will take a pragmatic approach to manage this as effectively as we can.

Trials of air traffic control operational procedures

1.57 Some air traffic control operational procedure changes will be trialled before being implemented permanently. For information about the decision-making process for such trials, please refer to CAP 1616g, Guidance on Airspace Change Process for Temporary and Trials Airspace Change Proposals. Such trials do not fall within the scope of this guidance document.

Timescales

1.58 Figure 3 shows an illustrative timeline for the PPR decision-making process – although it should be noted that this is an entirely new type of decision, of which the CAA has had no experience. Consequently we emphasise that only in time will we know how long the process typically takes, particularly as the expectation is that we will not receive that many PPR proposals each year and the impacts of a given proposal could vary significantly.

1.59 The 46 weeks we have estimated for a typical PPR proposal to go through the process is considerably shorter than that estimated for CAP 1616, Airspace Change Process. This is because not all elements of the CAP 1616 airspace change process are used in the PPR process, and also because a PPR proposal will generally be much more specific than many proposed changes to the notified airspace design, with fewer design options.

1.60 The illustrative timeline in Figure 3 follows the colour coding for each stage from Figure 1. The time taken for each stage could vary considerably depending on the complexity of the proposal, the options available to address the issue or opportunity, and the potential impacts. These factors will determine the preparatory work required, the extent of the options appraisal, the duration and breadth of the consultation, and how quickly a solution can be developed that takes consultees' views into account. The timeline should therefore be read with this in mind, i.e. the process could be considerably shorter than 46 weeks, or potentially longer.

Figure 3 Illustrative timeline for PPR decision -making process

Stage	Step	Approx Duration	Notes
Stage 1 DEFINE	**Assess requirement**	**4 weeks**	
Stage 2 DEVELOP and ASSESS	**Options development** **Options appraisal**	**6 weeks**	Where the only workable options that can be taken forward are the PPR proposal or maintaining the status quo, options development and appraisal will take less time than the six weeks indicated here.
Stage 3 CONSULT / ENGAGE	**Consultation / engagement preparation** **CONSULT/ENGAGE GATEWAY** **Commence consultation / engagement** **Collate & review responses**	**24 weeks**	The only gateway in the PPR process. As in the airspace change process, the CAA commits to internal gateway meetings on a published schedule, with deadlines for document submission. Assumes a twelve week consultation. However, less time may be required depending on the anticipated impact of the change and the number of stakeholders affected.
Stage 4 UPDATE and SUBMIT	**Update design** **Submit proposal to CAA**	**4 weeks**	Assumes four weeks for the air navigation service provider to update its proposal in light of consultation feedback. Depending on the nature and extent of feedback received, this process may take less time, or more if re-consultation is needed.
Stage 5 DECIDE	**CAA assessment** **CAA DECISION**	**8 weeks**	Assumes eight weeks for the CAA assessment + decision. Complex cases could take longer
Stage 6 IMPLEMENT	**Implement**	**As AIRAC schedule (~16 weeks)**	

Chapter 2

Identifying a PPR

Introduction

2.1 This chapter is about how an air navigation service provider identifies a relevant PPR. It is in two sections:

- how a relevant PPR is defined
- the need for an air navigation service provider to use an internal 'trigger' process to ensure that it identifies a change in air traffic control operational procedure that needs to go through the PPR process.

What is a 'relevant PPR'?

2.2 An air navigation service provider must assess whether a proposal to amend air traffic control operational procedures might lead to a planned and permanent redistribution of air traffic, and if so whether it meets certain criteria set out in the Air Navigation Directions, in which case it is referred to as a 'relevant PPR'.

2.3 Paragraph 1 of Schedule 1 to the Directions (interpretation and scope) explains that relevant PPR means a proposed PPR which both:

- falls within scope of one or more of **Types 1, 2 or 3**
    - Type 1. Lateral shift in flight track of more than a specified distance
    - Type 2. Redistribution between Standard Instrument Departure routes
    - Type 3. Change to Instrument Landing System joining point (on approach)
- **and**
    - relates to an airport in scope, i.e. which has a Category C or D (or both) approach landing procedure[13], and/or established Standard Instrument Departure routes published in the UK Aeronautical Information Publication.

2.4 Around 50 UK airports are in scope of this definition, including the 30 biggest UK airports in terms of passenger numbers. The list of these airports could change over time, so the CAA regularly publishes it on its website[14]. If an airport is not

[13] Aircraft approach category is a grouping of aircraft based on the speed at which they approach a runway for landing. Categories C and D typically relate to commercial or military jet aircraft.

[14] **https://www.caa.co.uk/Commercial-industry/Airspace/Airspace-change/Airspace-Change**

on this list, then the PPR process cannot apply to the air traffic control operational procedures relating to it.

2.5 The list does not include military airfields because a PPR proposed by or on behalf of the Ministry of Defence is exempt from the process.

2.6 Paragraphs 2 and 3 of Schedule 1 to the Directions give additional information on interpretation and scope. Paragraph 2 says that the definition is designed to capture only air traffic control operational procedures that relate to airports at which large commercial air transport and most business jets operate. It does not capture aerodromes or airports used only by small non-commercial aircraft.

2.7 Paragraph 3 goes on to say that changes to air traffic control operational procedures that are planned and permanent will typically be recorded in writing and given as some form of instruction to an air traffic controller[15]. An example would be a change to an air navigation service provider's Manual of Air Traffic Services (MATS) Part 2. The MATS Part 2 is a locally specific manual owned by air navigation service providers that, in conjunction with the MATS Part 1 published by the CAA, underpins how its air traffic controllers manage aircraft and informs their decisions[16].

The three 'types' of relevant PPR

2.8 In order to meet the first criterion to qualify as a PPR that requires a CAA decision, the proposed PPR must fall into one of three types, 1, 2 or 3. In each case we begin by reproducing the definitions from the annex to the Directions, and then use examples to illustrate the kind of changes that we expect to be in scope.

Type 1 – Lateral shift in flight track of more than a specified distance

2.9 In broad terms, a Type 1 PPR occurs where there is a proposed lateral shift in the tracks flown over the ground by a certain distance. The lower the height of the aircraft above ground level, the shorter the lateral shift needs to be for it to qualify as a Type 1.

2.10 The legal definition of a Type 1 is set out in Schedule 1 to the Directions. This defines a Type 1 as:

"A PPR which is (or more than one PPR within 24 months whose cumulative effects are) anticipated to result in a lateral shift of aircraft from the pre-existing

[15] The CAA interprets "in writing" as including any form of digital communication, and "instruction" to include any written guidance or communication intended or likely to be regarded as mandatory.

[16] The MATS contains procedures, instructions and information which are intended to form the basis of air traffic services within the UK. It is published for use by civil air traffic controllers and for the general interest of a wider audience. It is arranged in two parts:

MATS Part 1: Instructions that apply to all UK Air Traffic Service Units (published by the CAA as CAP 493)

MATS Part 2: Instructions that apply to a particular Air Traffic Service Unit, produced locally and approved by the CAA, amplifying and interpreting, at local level, MATS Part 1 instructions.

Any authorisation required by MATS Part 1 appears in the MATS Part 2

nominal centre line of the density of flight tracks of at least the horizontal distance shown in the second column of Table 1, at the heights shown in the first column of that table –

Table 1 Lateral shift of centreline distances

Height in feet above ground level (agl)	Horizontal distance from the centreline
1000ft	300m
2000ft	500m
3000ft	800m
4000ft	1100m
5000ft	1300m
6000ft	1600m
7000ft	1900m

Additional information given in the Directions about Type 1

2.11 Schedule 1 to the Directions gives the following additional information about Type 1:

"The figures in the Table 1 are based on an approximate correlation to a 3dB change following advice from the CAA.

"The ANSP [air navigation service provider] will need to assess the lateral shift of traffic from the nominal centre of the density of flight tracks1 to establish whether the expected lateral shift is equal to or greater than that shown in Table 1 above. So a 1350m shift away from the existing centreline at 5000ft [above ground level] would be a Type 1 PPR, but not if the shift was 1200m at 5000ft agl. The CAA has discretion to interpolate if the height at which the change is being proposed falls in between those shown in the table above.

"It is recognised that ANSPs [air navigation service providers] make air traffic control operational changes with the best of intentions and for safety reasons need some flexibility in doing so. At the same time, uncontrolled multiple changes that individually fall below the threshold could have a cumulative impact similar to a single change that does meet the threshold. To mitigate against this possibility, if a change below the threshold is made, any further operational change(s) proposed within 24 months of the first change must be judged against the Type 1 PPR criteria by adding together the lateral shift of each change. Where the cumulative effect of changes made within a rolling 24-month period meets or exceeds the threshold set out in Table 1, the change that results in the threshold

being met or exceeded will be judged to have met the criteria for a Type 1 PPR and will need to be considered as such. A PPR which has already been approved by the CAA is not to be included in assessing the cumulative effect of any further change."

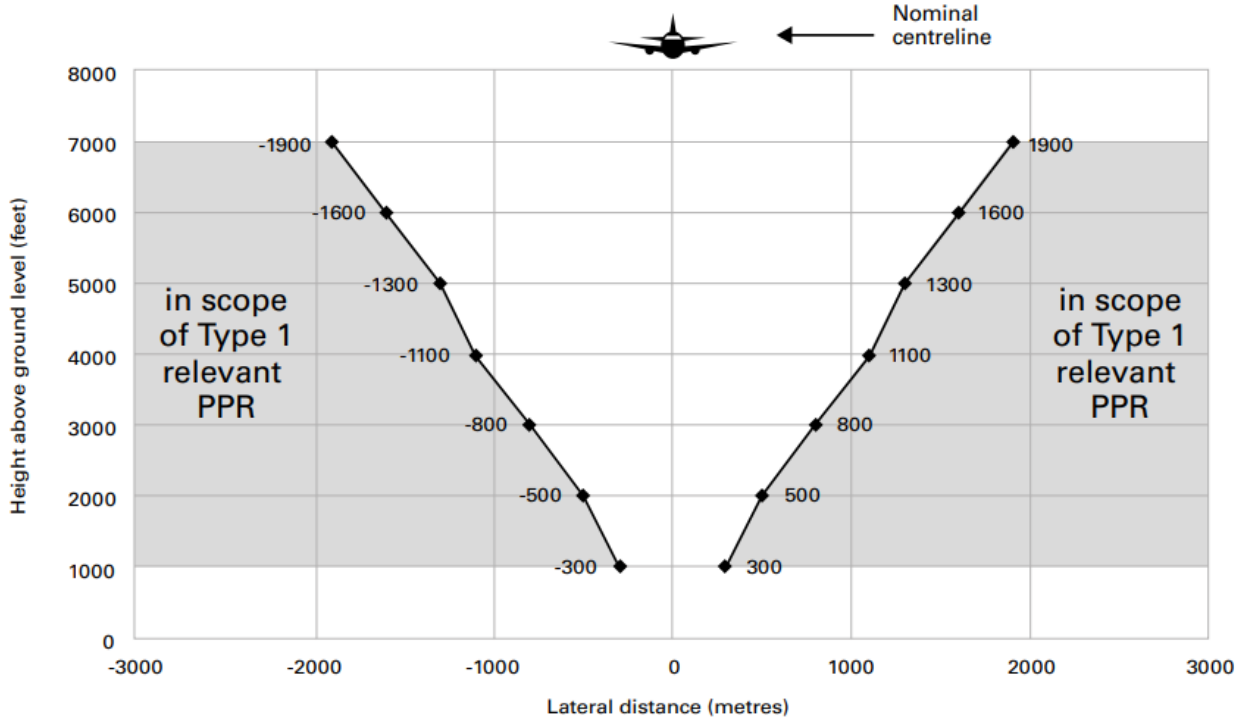
Note 1. The centre of the density of actual flight tracks shall where possible be determined or interpreted from radar data, the sample of which should be sufficiently representative (two weeks to one month of data). Where radar data is not readily available, air traffic control expert judgement should be used.

Graphical interpretation of Type 1

2.12 Figure 4 shows the CAA's graphical interpretation of the definition of a Type 1 PPR. If the aircraft's anticipated track is shifted by the change in air traffic control operational procedure such that it moves from the nominal centre of the density of flight tracks to a point in the shaded area outside the 'cone', then it is in scope of Type 1.

2.13 Note that a shift in a track below 1,000 feet is not a relevant PPR.

Figure 4 Graphical interpretation of the definition of a Type 1 PPR



2.14 In respect of an airport with two parallel runways, the air navigation service provider does not assess tracks from each runway separately for the purposes of identifying a Type 1 PPR. Instead the analysis must aggregate the flight tracks from the two parallel runways in order to assess whether the shift in the nominal centreline is sufficient to meet the criteria for a Type 1 PPR.

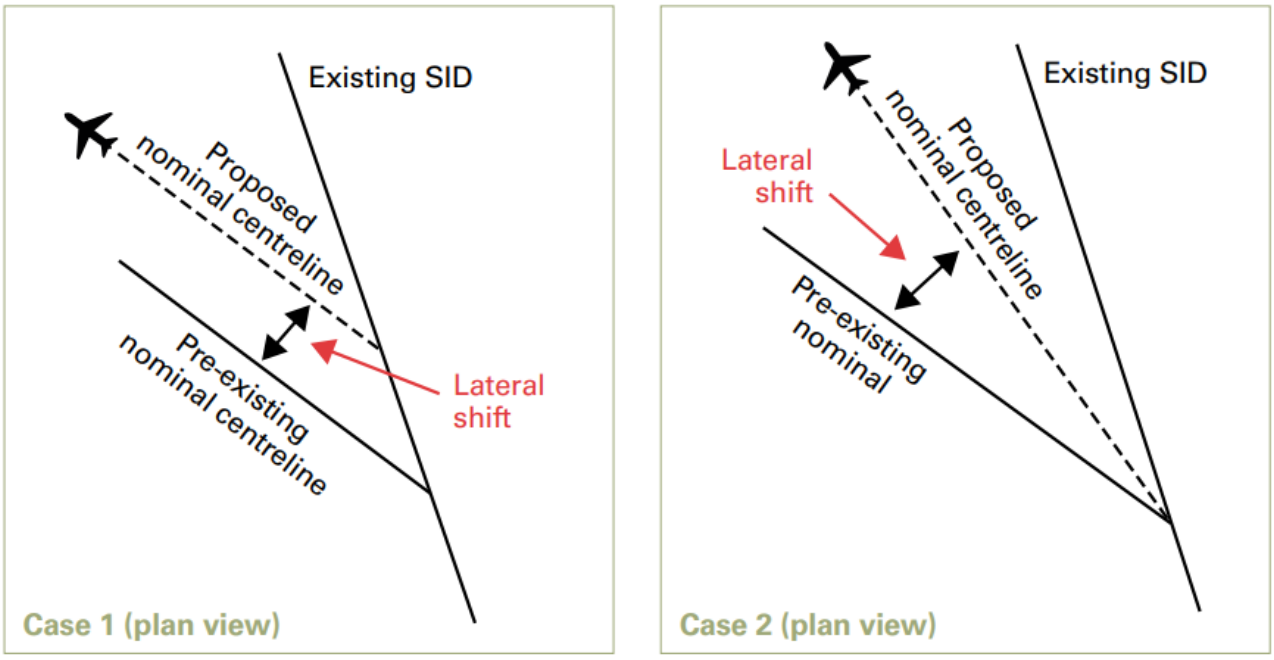
Examples of Type 1 – departing aircraft

2.15 Two examples where a lateral shift may occur as the result of a permanent change in written air traffic control operational procedure for departing aircraft are:

- where an airport has no Standard Instrument Departure routes, and there is a permanent change in the written procedures used by air traffic control for directing departures
- where aircraft initially depart using a Standard Instrument Departure route, but there is a permanent change in the written procedures used by air traffic control for them to be vectored off that route.

2.16 These examples are illustrative and others will exist. In each example, the change introduced could be that the air traffic control instruction is given at a different altitude to that used previously, or that the instruction is given at the same altitude, but directs the aircraft on to a different compass heading. In the first case, the new flight track will be displaced parallel to the existing nominal flight track. In the second case, the flight track will begin to diverge from the existing flight track and the deviation will increase with increasing altitude (Figure 5). The air navigation service provider will need to ensure that it checks the anticipated lateral shift over the range of relevant altitudes and not just at the point where the air traffic control instruction is issued.

Figure 5 Illustrative examples of air traffic control operational procedure changes for departing aircraft that could lead to a Type 1 relevant PPR

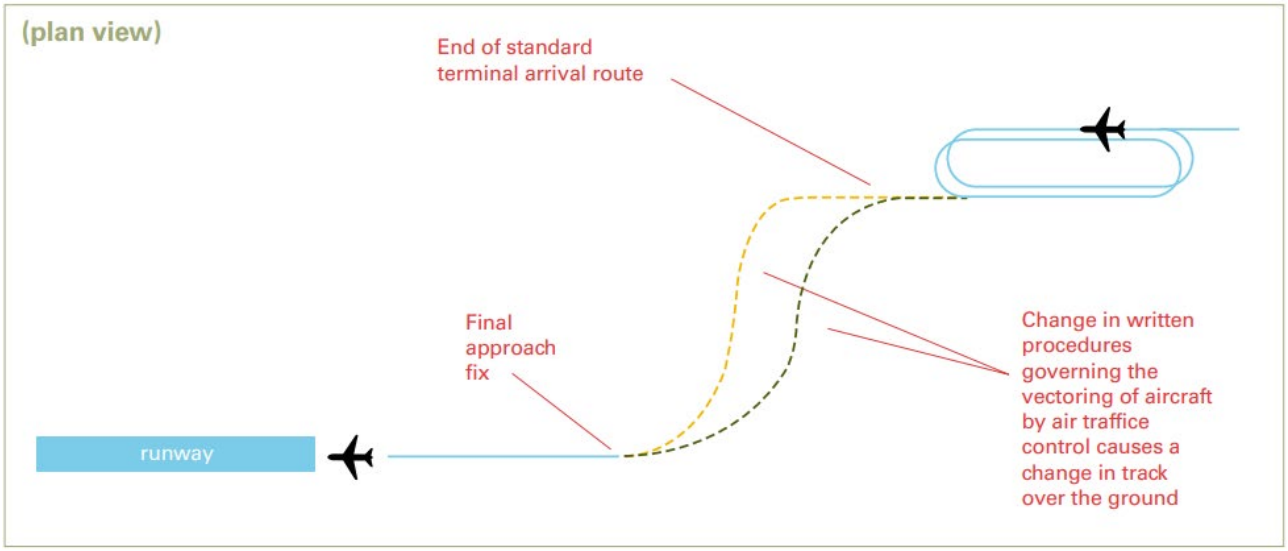


Example of Type 1 – arriving aircraft

2.17 There are no published airspace routes between the end of a Standard Arrival Route and the final approach fix (the point at which the aircraft reaches the final approach to the runway). Instead, aircraft follow the instructions of air traffic control in order to sequence them for landing. A Type 1 PPR could therefore occur as the result of a permanent change in written air traffic control operational procedure that govern these instructions (Figure 6).

2.18 In this example, there would be no change to the actual joining point, because if there were, that would fall under the Type 3 category (see below).

Figure 6 Illustrative example of an air traffic control operational procedure change for arriving aircraft that could lead to a Type 1 relevant PPR



Observations on Type 1

2.19 Of the three types of PPR, Type 1 is the most difficult for an air navigation service provider to identify.

2.20 To identify a potential Type 1 PPR, an air navigation service provider will need to have a sufficiently well developed proposal to judge whether the proposed air traffic control operational procedure will potentially result in sufficient lateral displacement of flight tracks to bring it within scope. The air navigation service provider will be required to determine the nominal centreline of the existing aircraft tracks and the tracks after implementation of the proposed change, and compare them at all heights below 7,000 feet. We recognise that variations in the type and granularity of data to which different air navigation service providers will have access will affect how they carry out this assessment.

Assessing the existing nominal track centreline

- where radar data exists, the air navigation service provider must assess that data to judge the nominal centreline of the existing flight tracks; the CAA will consider the nominal centreline to be the line in the centre of 90 per cent of the aircraft tracks over the previous year, using a density plot
- if no historic radar data is available, the air navigation service provider must simulate aircraft tracks for the purpose of this assessment
- where radar data is not available and simulation is not possible, the air navigation service provider must make a geometric estimation of current aircraft tracks, demonstrating the underlying assumptions and methodology it has used.

- *Assessing the anticipated tracks after implementation of the proposed change in air traffic control operational procedure*
  - where a trial of the proposed air traffic control operational procedure has been carried out, we expect an air navigation service provider to use trial radar data to compare with radar data of aircraft tracks before the trial
  - where there is no trial data, but an air navigation service provider has simulation data of the proposed air traffic control operational procedure, this must be used to assess the potential change in aircraft tracks
  - where neither trial nor simulation data exist, the air navigation service provider must make a geometric estimation of the position of aircraft tracks as a consequence of the proposed air traffic control operational procedure, demonstrating the underlying assumptions and methodology it has used.

2.21 Flight tracks altered by a Type 1 PPR are likely to be above 4,000 feet[17]. The definition of a Type 1 PPR means that a change in flight tracks above 7,000 feet is out of scope. However, it is important that the air navigation service provider recognises the possibility that a change in air traffic control operational procedures for aircraft above 7,000 feet could have a knock-on impact to the flight tracks of aircraft below 7,000 feet, and could therefore be in scope of Type 1.

2.22 There may be circumstances where an air navigation service provider seeks to enhance the accuracy with which an existing nominal centreline is flown, without making a change to airspace design. This may lead to a degree of redistribution of aircraft without any change to the nominal centreline. The CAA welcomes efforts by an air navigation service provider to improve track-keeping within a Noise Preferential Route swathe or in respect of an existing Standard Instrument

[17] At least where departing aircraft are required to adhere to a Noise Preferential Route. By definition, a PPR is very unlikely to occur before a Noise Preferential Route ends, which is typically 4,000 feet altitude (sometimes 3,000 feet) and must be below 7,000 feet.

Departure and/or Noise Preferential Route centreline. Such changes would be a Type 1 PPR only if the criteria set out above are met, which is unlikely.

Type 2 – Departure routes: redistribution between SIDs

2.23 Schedule 1 to the Directions defines Type 2 as:

"A PPR which is anticipated to increase air transport movements using a Standard Instrument Departure (SID) by at least 5,000 movements per year as a result of a decision by an airport and/or its ANSP [air navigation service provider] to redistribute air traffic from one SID to another at that airport."

Additional information given in the Directions about Type 2

2.24 Schedule 1 to the Directions gives the following additional information about Type 2:

"Type 2 applies when there has been a conscious decision by the airport and or its ANSP [air navigation service provider] to redistribute ***existing*** traffic at the airport.

"A PPR shall not be considered as a Type 2 PPR solely due to an increase in the number of air transport movements on a SID which is a direct result of changing weather patterns, or airline operations, natural growth, or as a result of agreed (i.e. through the planning system) air transport capacity enhancements at the airport."

Examples of Type 2

2.25 As part of the 'LAMP1A' proposal for a change in airspace design, there was a switch of traffic between Standard Instrument Departure routes at Stansted airport[18]. Daytime departing traffic was switched from the 'DVR' route to the 'CLN' route for both runway 04 and runway 22 operations (i.e. aircraft taking off in a northeasterly direction and those taking off in the reciprocal southwesterly direction respectively from Stansted's single runway). The shift affected just over 20,000 air transport movements per year.

Observations on Type 2

2.26 The departure route is generally chosen according to the destination of the flight, but sometimes there are reasons for shifting flights from one pre-existing departure route to another. The threshold of 5,000 movements a year means a significant shift is required to qualify as a Type 2 PPR; this represents an average of around 14 departures a day over the course of a year. In the above

[18] https://www.caa.co.uk/Commercial-industry/Airspace/Airspace-change/Decisions/London-Airspace-Management-Programme-Phase-1A/ (see Module A). This particular case was assessed and approved by the CAA as part of the LAMP1A proposal for a change in airspace design, even though the switch itself did not require a change in procedures published in the Aeronautical Information Publication (i.e. the switch itself was not a change in airspace design). The airspace change sponsor chose to put this change through the airspace change process voluntarily. Such a change would now be classified as a Type 2 PPR although where caused by a proposed change in airspace design the airspace design and PPR changes would normally be considered together.

example, Standard Instrument Departure routes for aircraft departing runway 04 are different from those departing runway 22 and so the affected air transport movements would be counted separately.

2.27 The Air Navigation Directions do not define air transport movements, but this is a recognised industry term. The CAA will follow the definition in CAA airport statistics, which distinguish between aircraft movements and air transport movements as follows:

- aircraft movements means any aircraft landings or take-offs at an airport, whether commercial or non-commercial flights; one arrival and one departure are counted as two movements
- air transport movements means landings or take-offs of aircraft engaged on the transport of passengers, freight or mail on commercial terms; all scheduled movements, including those operated empty, loaded charter and air taxi movements are included.

Type 3 – Change to ILS joining point (on approach)

2.28 Schedule 1 to the Directions defines Type 3 as:

"A PPR which results from a significant change to the written specified landing arrangements of aircraft at a UK airport referred to in paragraph 1 (or more than one such change within 36 months whose cumulative effects are significant)."

2.29 Schedule 1 goes on to define two of the terms in that sentence:

- **'change to the written specified landing arrangements':** "means a change to the established minimum, or where applicable maximum, distance of the joining point onto an airport's Instrument Landing System (ILS) or any significant changes to the height at which aircraft must establish onto the ILS"
- **'significant':** "changes to the written minimum joining point at such airports greater than a cumulative total of at least 300 feet vertically or 1 nautical mile horizontally within a rolling 36-month period will be considered as 'significant' and thereby constituting a Type 3 PPR."

Additional information given in the Directions about Type 2

2.30 Schedule 1 to the Directions gives the following additional information about Type 3:

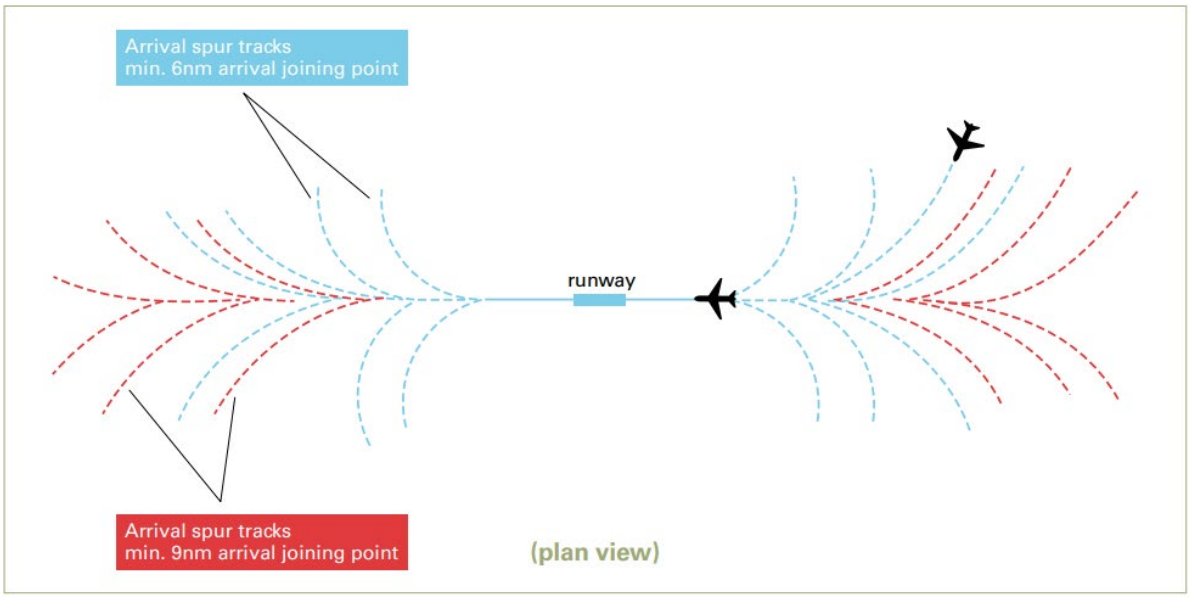
"In circumstances where multiple changes made within a 36-month rolling period have the cumulative effect of meeting or exceeding the threshold set out in Type 3, the change that results in the threshold being met or exceeded will be judged to have met the criteria for a Type 3 PPR and will need to be considered as such. A PPR which has already been approved by the CAA is not included in assessing the cumulative effect of any further change."

Type 3 examples; effect of ILS joining point change at an airport

2.31 This example assumes a change in the point at which aircraft join the Instrument Landing System. Figure 7 shows how this might affect some illustrative flight tracks of arriving aircraft at a generic regional UK airport, if the joining point is moved from a minimum of six nautical miles from the runway (tracks in blue) to a minimum of nine nautical miles (tracks in red). Note that the 'swathe' covered by the tracks has moved outwards relative to the runway.

2.32 This example is used to illustrate the environmental noise assessment that the air navigation service provider will potentially need to undertake as part of the PPR decision-making process.

Figure 7 Illustrative example of an air traffic control operational procedure change causing a shift in ILS joining point that could lead to a Type 3 relevant PPR



Observations on Type 3

2.33 As noted in the Type 1 'arrivals' example, there are often no published routes between the end of the Standard Arrival Route (the 'holds') and the final approach fix, meaning that this is a change in written procedures but not in the flight procedures published in the Aeronautical Information Publication. It is therefore not a change in airspace design.

Air navigation service provider internal 'trigger' mechanism for identifying a relevant PPR

Introduction

2.34 The concept of the 'trigger' mechanism was conceived on the basis that only the air navigation service provider would have the necessary information to understand the impacts of a given change in air traffic control operational procedure and therefore whether it was in scope of the PPR decision-making process.

2.35 The PPR process is only initiated after an air navigation service provider's own embedded internal process – possibly as part of its existing safety management system – has identified a change in air traffic control operational procedure as a relevant PPR that requires approval before it can be implemented (a 'trigger' mechanism). This is not part of the regulatory process, because it is the air navigation service provider which 'owns' changes to its written procedures. However, when in doubt, the air navigation service provider can approach the CAA for a determination under paragraph 15 of Schedule 1 to the Air Navigation Directions as to whether a given PPR proposal is a relevant PPR.

The need for an identification stage

2.36 A PPR is created through a change in air traffic control operational procedure, which is initiated by the air navigation service provider, recorded in writing and given as some form of instruction to an air traffic controller. For example, where it is recorded in an internal, unpublished locally specific procedures document known as MATS Part 2. In contrast, an airspace change proposal is created by a proposed change to the notified airspace design that is required to be published in the Aeronautical Information Publication. Production of the Aeronautical Information Publication is a UK state function delivered by the CAA[19]. As a result, CAA approval must be obtained for us to change it.

2.37 In the case of an air traffic control operational procedure change:

- only the air navigation service provider knows that an air traffic control operational procedure change is under consideration
- the CAA has a decision-making role for certain operational procedure changes
- therefore the air navigation service provider needs to establish very early on whether a CAA decision is required before a given air traffic control operational procedure change can be implemented.

[19] The function is managed for the CAA by NATS (En Route) plc (NERL) under licence.

2.38 The identification of a relevant PPR in the first place is therefore a key precursor to the PPR decision-making process. Only if the air navigation service provider has an internal procedure in place will it be able to identify the need for a given change to go through the PPR process and be approved by the CAA before implementation. It is therefore essential that all air navigation service providers potentially in scope of PPR have such an internal procedure. This procedure ensures that the need to go through the PPR process is identified at a sufficiently early stage while the proposal is being developed and that a relevant PPR is not implemented without CAA approval. It comes before the regulatory decision-making process itself.

Introducing a PPR identification check: trigger process

2.39 This PPR check by the air navigation service provider will:

- identify any change that has the potential to alter traffic patterns
- automatically trigger an assessment of any such change to establish whether it meets the criteria for a relevant PPR, by modelling the anticipated geometric change in the track taken over the ground.

2.40 Where a change does meet those criteria, the air navigation service provider must:

- initiate the CAA decision-making process
- consider at this very early stage what options there are that would meet the objective of the change
- consider who is potentially impacted by those options, including those on the ground
- integrate these steps with its existing safety management system and interaction with the CAA such that there is no duplication, i.e. safety assurance forms part of the PPR process.

2.41 This may require a change of culture for the air navigation service provider, which prior to the PPR process will have been more used to considering only the operational implications of the change. The air navigation service provider must not rely on the CAA's oversight. It must be the air navigation service provider that identifies a change as a relevant PPR. Indeed the Directions actually require this of the CAA's process[20].

2.42 The CAA will monitor operational procedure changes through the temporary operating instructions and supplementary instructions that air navigation service providers are required to notify to us for the purposes of safety oversight. This

[20] Direction 9A(2)(b) states that our decision-making process must require an air navigation service provider to refer a proposal for a PPR to the CAA for approval before it is implemented.

will allow us to monitor how the trigger process is performing. Ultimately it is the responsibility of the air navigation service provider to identify whether a given change is in scope. As noted earlier, the CAA has no statutory power to require the air navigation service provider to go through the PPR decision-making process.

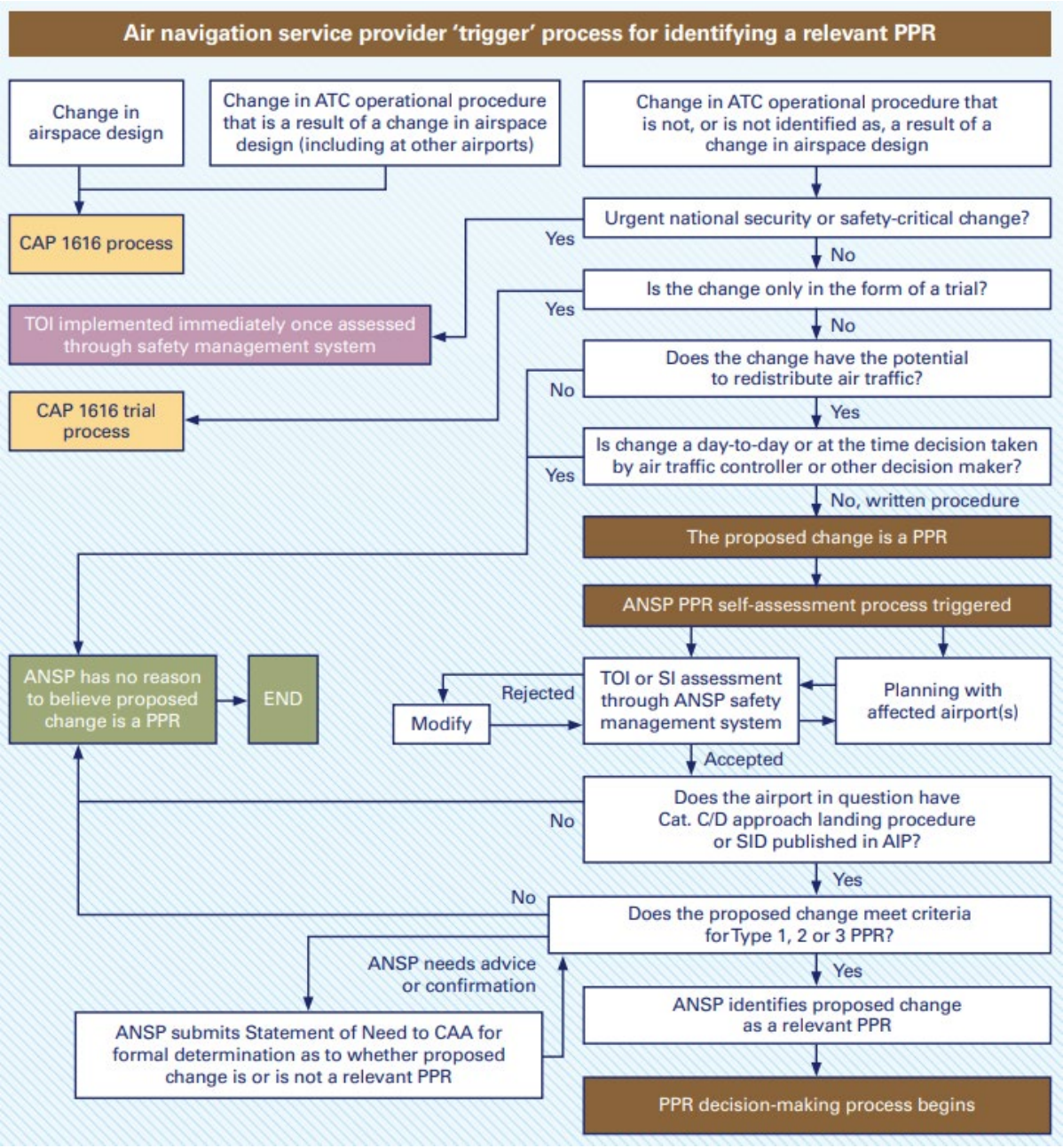
2.43 The CAA does not dictate a standard internal process. However, by bringing this guidance document (and CAP 1786, the consultation document that preceded the inclusion of PPR) to the attention of all air navigation service providers and airports in scope, the CAA has endeavoured to ensure that each air navigation service provider is aware of its obligations. Each air navigation service provider needs to plan, resource and train staff accordingly to introduce its own trigger mechanism.

2.44 The air navigation service provider's trigger process needs to recognise that:

- a proposed Temporary Operating Instruction (i.e. of limited duration) could still give rise to a relevant PPR; although PPR stands for 'planned and permanent', any change in the form of written-down procedures may qualify, and this does not exclude temporary changes
- where a proposed change to the notified airspace design creates a change in air traffic control operational procedure which is within scope of the definition of a relevant PPR, the changes must be regarded together as a package and will form part of the proposal for the airspace design change.

2.45 Figure 8 is a flow chart showing the internal 'trigger' process from the air navigation service provider's perspective.

Figure 8 Air navigation service provider 'trigger' process for identifying a relevant PPR



Integration with the existing safety assurance process

2.46 Underlying this need to identify a relevant PPR is the existing process for safety assurance of any procedure change. This is achieved through the air navigation service provider's safety management system, which is already subject to the CAA's safety oversight. All air traffic control operational procedure changes – which will be much wider than those in scope of a PPR – are documented in either a Temporary Operating Instruction or a Supplementary Instruction. These are both submitted to the CAA, but approval prior to implementation is not a requirement for all. The Temporary Operating Instruction is used to implement a temporary change, generally for up to six months, although some may be for

longer. A Supplementary Instruction is used for a more permanent change to MATS Part 2 or its equivalent, into which it is eventually incorporated in periodic updates.

2.47 An air navigation service provider (sometimes at the behest of the airport contracting it) is constantly seeking ways to improve the efficiency and safety of its operation, often through incremental changes. The challenge is for an air navigation service provider's internal processes and staff skillset to have been developed sufficiently so as to ensure that at the same time as putting an intended change through its safety management system, it also has the necessary capability to include a 'PPR check'[21].

2.48 The introduction of the PPR decision-making process does not in itself alter the continuing requirements for submitting a Temporary Operating Instruction or a Supplementary Instruction, which remain in place. However, to ensure that the air navigation service provider remains cognisant of the need to consider whether any change could be a relevant PPR, it is required to submit a CA1430 form to the CAA's Air Traffic Management team with the Supplementary Instruction where it believes a proposed change to be in scope of a relevant PPR.

CAA determination of whether a proposed change is a relevant PPR

2.49 When the Statement of Need is submitted through the online airspace portal for a PPR proposal, the CAA will need supporting information to determine whether or not the proposal is a relevant PPR. This will require the air navigation service provider to include supporting modelling work explaining the change, including anticipated tracks that aircraft will fly over the ground (for example, as described in more detail in our observations in Chapter 3). We may also require other additional information that allows us to consider the air navigation service provider's assessment and to make our determination. Specifically we would expect to see the information in paras 115.1-119.1.

2.50 Paragraph 15 of Schedule 1 to the Air Navigation Directions says:

"If there is any doubt about whether a proposed PPR falls within Type 1, 2 or 3, the ANSP [air navigation service provider], or airport as appropriate, should consult the CAA. The CAA's decision is to be determinative of whether or not the proposed PPR would be a relevant PPR."

2.51 The mechanism for consulting the CAA is for the air navigation service provider to submit a Statement of Need through the airspace change portal. We can then consider the air navigation service provider's own assessment of the proposal

[21] Clearly the air navigation service provider does not want to put through the PPR process a change that would introduce an unacceptable level of risk as defined by its own safety management system. The change management process for air navigation service providers is set out on the CAA's website. https://www.caa.co.uk/Commercial-industry/Airspace/Air-traffic-control/Air-navigation-services/Certification-and-designation/Change-management-and-change-notification-process/

and any other additional relevant information that allows us to consider that assessment and to make our determination.

2.52 In summary, a Statement of Need is submitted by an air navigation service provider, if necessary on behalf of an airport operator, where:

- it identifies a proposed operational procedure change as a relevant PPR
- it identifies a proposed operational procedure change as not being a relevant PPR, but wants the CAA's confirmation of that assessment, for example to provide transparency for local residents
- it is unsure whether a proposed operational procedure change is a relevant PPR, and is asking the CAA to make a determination under paragraph 15 of the annex to the Air Navigation Directions.

2.53 Where the CAA concludes that an air navigation service provider has properly assessed that its proposal's anticipated outcomes do not meet the criteria for a relevant PPR, we will confirm that the proposal can be implemented by the air navigation service provider without the need for a CAA PPR decision.

2.54 The online portal will provide transparency around which proposals were found to be in scope and which were not. Over time, the online portal will become a useful repository that will help those wishing to learn more about the process and these assessments.

Information required by the CAA for a determination under paragraph 15 of Schedule 1 to the Air Navigation Directions 2023

2.55 **Density/heat map** identifying current and new arrangements of the nominal swathe centreline (defined as centreline of 90% of the aircraft movements):

- the amount of data will be dependent on the airport, but it needs to accurately reflect the current arrangements; for example one month or six months of data may be needed depending on the number of aircraft movements in the sample being analysed
- trial data is best for assessing the new arrangements, ideally covering at least 1,000 flights to produce a realistic expectation of change in nominal swathe; however, a trial of the new arrangements is not mandatory

Required for Type 1 and 3**.

1. **Noise contours/WEBTAG**. When conducting noise assessment, if there is no change in contours above 51dB LA_{eq16hr} (or 45dB $LA_{eq8hr\ night}$) then WebTAG does not need to be used, since the noise cost would be zero. However, this needs to be evidenced by the air navigation service provider.

Required for Type 1, 2* and 3.

2.56 Overflight assessment up to 7,000 feet

Required for Type 1, 2 and 3.

2.57 Fuel assessment

Required for Type 1, 2 and 3.

2.58 **Track plot diagrams** colour coded by altitude

Required for Type 1 and 3.

Notes

*A Type 2 change involving the redistribution of traffic from SID A to SID B could also result in a shift of the centreline of the nominal swathe due to differing air traffic control vectoring practices applied between the two SIDs. The air navigation service provider will therefore need to ensure that a Type 2 change addresses any consequential changes that also result in the change meeting the criteria for a Type 1 change.

** Only required where the change in joining point may result in a shift of the lateral position of the centreline of the nominal swathe from the end of the STAR to the ILS joining point

Chapter 3

The PPR decision-making process – Stages 1 to 7

Introduction

3.1 More detail on each stage of the PPR decision-making process is set out on the following pages. These follow the same format as the equivalent pages in CAP 1616, Airspace Change Process. The text highlights where differences lie between the PPR process and the decision-making process for changes to the notified airspace design on which it is based and which is set out in CAP 1616, Airspace Change Process. These pages are followed by a flow-chart on page 46 (Figure 9) illustrating the whole PPR process.

3.2 The expectation is that few PPR proposals will be submitted each year compared with proposals for a change to the notified airspace design. However, because only the air navigation service provider knows whether it is contemplating a change in air traffic control operational procedure, it is crucial that the air navigation service provider uses an internal 'trigger' process that allows it to identify which changes must be put through the PPR decision-making process. This is described on Page 10 (Figure 2).

3.3 This 'identify' stage is not part of the regulatory process, but is an essential precursor to it.

PPR Stage 1 Define

Assess Requirement

3.4 Having used an internal trigger process to identify a proposed change to its air traffic control operational procedures as a relevant PPR, the air navigation service provider initiates the first stage of the PPR process. This is for it to submit a Statement of Need to the CAA[22]. In particular the CAA will be expecting to see included within the Statement of Need, even at this early stage, evidence and analysis for the conclusion that the proposal is expected to meet the criteria for a relevant PPR.

3.5 Having reviewed this material, the CAA will hold a discussion with the air navigation service provider, if necessary in the form of a meeting, to agree whether the PPR process must be followed (confirming the identification of a relevant PPR), and if so, indicative timelines. The CAA will decide how (if at all)

[22] An air navigation service provider may ask the CAA to determine whether a proposal is or is not a relevant PPR (paragraph 15 of the Annex to the Air Navigation Directions). The Statement of Need is the process for the CAA doing so.

the PPR process that the air navigation service provider must follow can be scaled appropriate to the type of change, based on the air navigation service provider's proposals. The CAA will also agree with the air navigation service provider whether early engagement with affected stakeholders at Stage 2 would be useful, for example in the case of a high-impact change.

3.6 Only a change in air traffic control operational procedures can create a PPR. If those procedures do not change, then it is not a PPR; it may be a change to the notified airspace design, or it may be neither. Only an air navigation service provider can seek approval for a PPR, but it is required to confirm on the Statement of Need whether it has the full agreement of any relevant airport operator before embarking on the PPR process and whether the instigator is an organisation other than the air navigation service provider.

3.7 The PPR process will be initiated by the submission of a Statement of Need and an associated entry will subsequently be created on the online portal, which will also host all of the outputs produced by air navigation service providers throughout the process. (Pending the upgrade of the online portal to accommodate PPR proposals, there will be an interim arrangement using the CAA website.) The CAA will aim to make its determination on whether a proposed PPR falls within scope of the process during the initial exchanges with the air navigation service provider – or within 21 days of the air navigation service provider submitting the information we need, if further work is needed – and the outcome will be published on the online portal. This transparent approach will support the education of air navigation service providers, as they will be able to see details of the operational procedure changes that were or were not found to be in scope of the process.

PPR process differences from the CAP1616 airspace change process

3.8 The air navigation service provider does not develop design principles for a PPR. There are only three types of PPR that require approval, and these are very specifically defined. Therefore the scope for designing a solution, or for choosing between different options, is limited.

3.9 Consequently there is no 'Define' gateway in the PPR process.

PPR Stage 2 Develop and assess

Options development

3.10 Each of the three types of PPR could, in theory, have different options for addressing a particular issue or opportunity that needs resolving. For example, the number of movements shifted from one existing departure route to another (Type 2) or the exact positioning of the ILS (Instrument Landing System) joining point (Type 3). The CAA would expect the air navigation service provider to

begin with a list of all possible options. 'Do nothing' or 'do minimum' must always be an option unless ruled out on safety or regulatory grounds.

3.11 That said, we recognise that a change in air traffic control operational procedure is quite different from a change to the notified airspace design, and that circumstances will dictate how practical or credible it is to pursue different options. In some cases there may be only one option – for example, a safety-related change could be a binary choice. The air navigation service provider should not shortlist options for the sake of it, but multiple options will normally be its starting position. The air navigation service provider must be completely transparent in its reasoning as to what and why options have been discounted, and in particular must justify a binary choice. It needs to consider whether it is possible for traffic to be directed any differently creating different impacts locally.

3.12 The air navigation service provider will need to consider whether early engagement with affected stakeholders would be useful. In the case of a high-impact change, the CAA will encourage the consultation at Stage 3 to have been informed by such engagement. It is important to communities that 'no surprises' arise from a relevant PPR, so early engagement could be useful to signal ahead of formal consultation that there is a potential change in the pipeline. The smaller the potential impact of the change, the more likely that we will agree that early engagement might be confined to information provision while the finer details are being worked out, or that there is no need for early engagement. However, if at the assessment meeting the CAA strongly encourages early engagement and the air navigation service provider chooses not to, the CAA's decision at the first gateway would depend on whether the lack of engagement had negatively impacted the options presented, the consultation strategy and supporting materials.

Options appraisal

3.13 The Air Navigation Guidance 2017 states it is expected that a sponsor must carry out the appraisal and the CAA, as regulator, ensure that this options appraisal is undertaken appropriately and in line with government policy. Where there is only one option, this would be a comparison with the status quo.

3.14 If the air navigation service provider identifies a number of options, it needs to carry out an 'Initial' options appraisal (which will normally, as a minimum, contain qualitative assessment of the different options). If there are a maximum of two genuine possible options (including, where applicable, the 'do nothing'/'do minimum' option), then the air navigation service provider, with the CAA's agreement, does not need to complete the options appraisal and instead progresses to the consultation stage (Stage 3).

3.15 From a safety assurance perspective, the air navigation service provider will make its own internal assessment of proposed changes through its internal

safety management system, with the CAA providing overall safety regulatory oversight. While the new process will inevitably add some additional burden on the air navigation service provider, we hope that this will minimise that burden for these early pre-consultation stages, by building on the existing safety assessment arrangements.

PPR process differences from the CAP1616 airspace change process

3.16 Because the PPR proposal is likely to be simpler than a Level 1 change to the notified airspace design in terms of the number and nature of options available, there is no 'Develop and assess' gateway in the PPR process. Instead the 'Assess and consult' gateway provides the necessary check and reassurance that the PPR process has been followed from Stage 1 up to that point.

PPR Stage 3 Consult

Consultation preparation

3.17 The extent of the consultation will tend to be self-scaling according to the impact of the change and those affected. While the accepted standard for consultation is 12 weeks, the CAA will consider a shorter period where the air navigation service provider presents a case within its consultation strategy based on:

- the impact of the change
- the audience map and impacted groups
- factors outside its control, such as legal constraints
- technical or operational constraints.

Consultation approval

3.18 The CAA reviews and gives its approval that the consultation strategy and associated consultation documents meet the requirements for an open, fair and transparent consultation (see CAP 1616f, Guidance on Airspace Change Process for Permanent Airspace Change Proposals). In particular they must be comprehensive, the materials clear and appropriate and the questions unbiased.

3.19 The CAA also reviews the Full options appraisal and publishes an assessment (see CAP 1616f, Guidance on Airspace Change Process for Permanent Airspace Change Proposals) of the appraisal process without offering comment on the merits of the individual options.

ASSESS and CONSULT Gateway

3.20 The assess and consult gateway occurs in the middle of stage 3. At this point, we will complete our regulatory assessment on the change sponsor's outputs and relevant supporting evidence to determine whether the requirements have

been followed. We will review and, where appropriate, approve that the consultation strategy meets the requirements of stage 3. We will also review a sample of the change sponsor's consultation materials, and the options appraisal, and provide feedback where appropriate. Once the change sponsor has passed through the stage 3 (assess and consult) gateway, they will commence consultation.

Commence consultation

3.21 After review and sign-off at the assess and consult gateway, the air navigation service provider must include the options appraisal in the package of documents on which it consults. This allows those being consulted to see the potential impacts of different options and provide more information or comment.

Collate and review responses

3.22 The air navigation service provider must review the responses and categorise them into those that present information that may lead to a change in the PPR proposal and those that could not, including those raising issues which are outside its control (such as government policy).

PPR process differences from the CAP1616 airspace change process

3.23 Stage 3 is the same as in CAP 1616, Airspace Change Process.

PPR Stage 4 Update and submit

Update proposal

3.24 The air navigation service provider needs to be transparent in showing how it has taken account of consultation feedback. This may include selecting one option over another, if more than one was consulted on. If the options appraisal reveals that the impact of the PPR proposal is fundamentally different to that previously anticipated, the air navigation service provider must discuss with the CAA whether it must undertake a second consultation.

Submit PPR proposal to the CAA

3.25 The proposal must be published on the online portal where it can be viewed by anyone. Where the proposal has a redacted version, the air navigation service provider uploads this to the portal for publication and submits the unredacted version to acp.submission@caa.co.uk.

PPR process differences from the CAP1616 airspace change process

3.26 The template used for submitting a proposal is the same as a proposed change to the notified airspace design, although some of the template will not be applicable (see CAP 1616f, Guidance on Airspace Change Process for

Permanent Airspace Change Proposals). This is in addition to the air navigation service provider fulfilling change management obligations for safety oversight.

3.27 Unlike a proposed change in airspace design, a PPR proposal cannot be called-in by the Secretary of State, because no provision for this is made in the Air Navigation Directions to the CAA. Therefore no call-in window is opened.

PPR Stage 5 Decide

CAA assessment

3.28 The CAA assesses the PPR proposal and all the documentation and evidence accompanying it, before making its decision. As with a proposed change to the notified airspace design, we will first carry out a document check and ensure that the 'Assess and consult' gateway has been passed and correct process followed.

3.29 The CAA then begins its analysis of the technical merits of the proposal against the requirements set out in CAP 1616f, Guidance on Airspace Change Process for Permanent Airspace Change Proposals. As set out in the CAP 1616 airspace change process the analysis is comprised of the following:

- Decision statement
- CAA final options appraisal assessment
- CAA safety review
- CAA operational assessment
- CAA consultation assessment
- CAA environmental assessment
- CAA decision log (explanation of how we reached our decision and required conditions/modifications).

3.30 More information is given in the relevant section under Stage 5 in CAP 1616f, Guidance on Airspace Change Process for Permanent Airspace Change Proposals, except that the analysis relates to the proposed change in air traffic control operational procedure rather than a proposed change in airspace design.

CAA decision

3.31 The CAA's overall aim is to arrive at a fair, transparent, evidence-based decision in accordance with our statutory duties and relevant guidance, with the maximum of transparency. CAP 1616f, Guidance on Airspace Change Process for Permanent Airspace Change Proposals sets out the CAA's decision criteria and how we exercise those legal duties.

3.32 After the document check the CAA will make best endeavours to make its decision within eight weeks of receiving all the information we need, subject to the air navigation service provider also meeting its time commitments as previously agreed with the CAA. We expect this to be shorter in cases where there are few impacts on other stakeholders, but a case with significant or complex impacts could take longer.

3.33 The CAA's decision is published. The PPR proposal cannot be implemented if the CAA does not approve it[23]. There is no mechanism to appeal our decision, other than judicial review, nor can a PPR proposal be called-in by the Secretary of State.

PPR process differences from the CAP1616 airspace change process

3.34 A relevant PPR is a very specific proposal for an air traffic control operational procedure change. Therefore to keep the PPR process proportionate, unlike the CAP 1616, Airspace Change Process for a Level 1 proposed change to the notified airspace design, there is no Public Evidence Session for a PPR proposal, nor does the CAA seek comments on a draft of our final decision.

3.35 In view of this, our 'best endeavours' timeline for a PPR decision is half the 16 weeks we specify for the CAP 1616, Airspace Change Process, unless the proposal has significant or complex impacts.

3.36 The decision maker will be the Head of Airspace, ATM and Aerodromes or the Manager of Airspace Regulation.

3.37 Unlike a proposed change to the notified airspace design, a PPR proposal cannot be called-in by the Secretary of State, because no provision for this is made in the Directions to the CAA.

PPR Stage 6 Implement

3.38 The change is set out in a Supplementary Instruction for eventual incorporation in the air navigation service provider's permanent written procedures such as MATS Part 2, or in a Temporary Operating Instruction. These documents are not published, so the air navigation service provider must also specify how it will publicise a forthcoming change, including notifying affected stakeholder groups about the ultimate outcome of the consultation and the CAA's decision.

3.39 This might include airspace users, other service providers, the Ministry of Defence, the commercial General Aviation press, local General Aviation events, relevant community organisations and the local press. A reference to the online

[23] If the PPR proposed is an urgent, overriding national security or safety-critical change in operational procedure that is going through the process after it has been implemented, the operational procedure concerned would not immediately be removed if it were not approved. Instead the CAA would work with the air navigation service provider to consider what steps to take next.

portal where the decision and supporting documents have been published may be sufficient. This will be made clear by the CAA in its decision document.

3.40 The proposed implementation date of the change in operational procedure will have formed part of the air navigation service provider's formal proposal, and thus been subject to the CAA's approval.

3.41 The effectiveness of the change will be reviewed during the post-implementation review period prior to the beginning of Stage 7, which normally commences 12 months after implementation.

PPR process differences from the CAP1616 airspace change process

3.42 All references to the AIRAC (Aeronautical Information Regulation and Control) cycle or publication in the Aeronautical Information Publication do not apply to the implementation of a PPR.

PPR Stage 7 Post-implementation review

Post-implementation review

3.43 For a PPR the post-implementation review is carried out by the air navigation service provider, which submits a report to the CAA for review.

3.44 This is because the expertise for conducting a review of how the change performs in practice sits with the air navigation service provider. The Air Navigation Directions allow the CAA to attach conditions to its approval of a PPR. The CAA can therefore make approval conditional on a satisfactory post-implementation report by the air navigation service provider.

3.45 As soon as the PPR change is implemented, the air navigation service provider begins to review how it is performing. Twelve months after implementation, the air navigation service provider collates the information it has collected and publishes this on the online portal within 28 days of commencing the review. These timescales are set out in the CAA's decision from Stage 5. As in Stage 7, stakeholders then have 28 days from publication of this information to submit to the air navigation service provider evidence or views about the data that they want taken into account as it carries out the post-implementation review.

3.46 Four months from commencement of the review, the air navigation service provider publishes a report on the online portal summarising any feedback received and whether the anticipated impacts and benefits of the PPR change that the CAA approved have in practice been delivered. This report must follow a CAA template which identifies:

- any impacts different from those expected
- what modifications are required for impacts that vary from those which were anticipated at the time the CAA made its decision to approve the PPR, and

- any learning points where impacts vary from those which were anticipated.

3.47 When the CAA reviews the air navigation service provider's report, we will state whether we consider the post-implementation review open, closed, or partially satisfied:

- we will consider it closed if the implemented change in operational procedures satisfactorily achieves – within acceptable tolerance limits – the objective and terms of the CAA's approval
- we will consider it open if we are not satisfied with the report (if, for example, we believe the analysis to be inconclusive) and will require the air navigation service provider to rectify the shortcomings in the report
- we will consider it partially satisfied if the change in operational procedures requires modifications to better achieve the objective and terms of the CAA's approval.
- In the third case, the CAA will require that those modifications are then further monitored for effectiveness. Once the modifications have been implemented and operated for a period (approximately six months), there are three further possible outcomes (mirroring Stage 7 of the CAP 1616 airspace change process)
- noting that the modifications did not better achieve the objective and terms of the CAA's approval, we may conclude that the original change in procedures was satisfactory and is confirmed; or
- noting that the modifications did not better achieve the objective and terms of the CAA's approval, we may conclude that the original change in procedures was not satisfactory and the original change is not confirmed (in which case, in order to pursue its change in procedures, the air navigation service provider will need to commence a fresh PPR proposal from Stage 1); or
- we may conclude that the modifications do better – within acceptable tolerance limits – achieve the objective and terms of the CAA's approval and so the modified procedures will be confirmed.

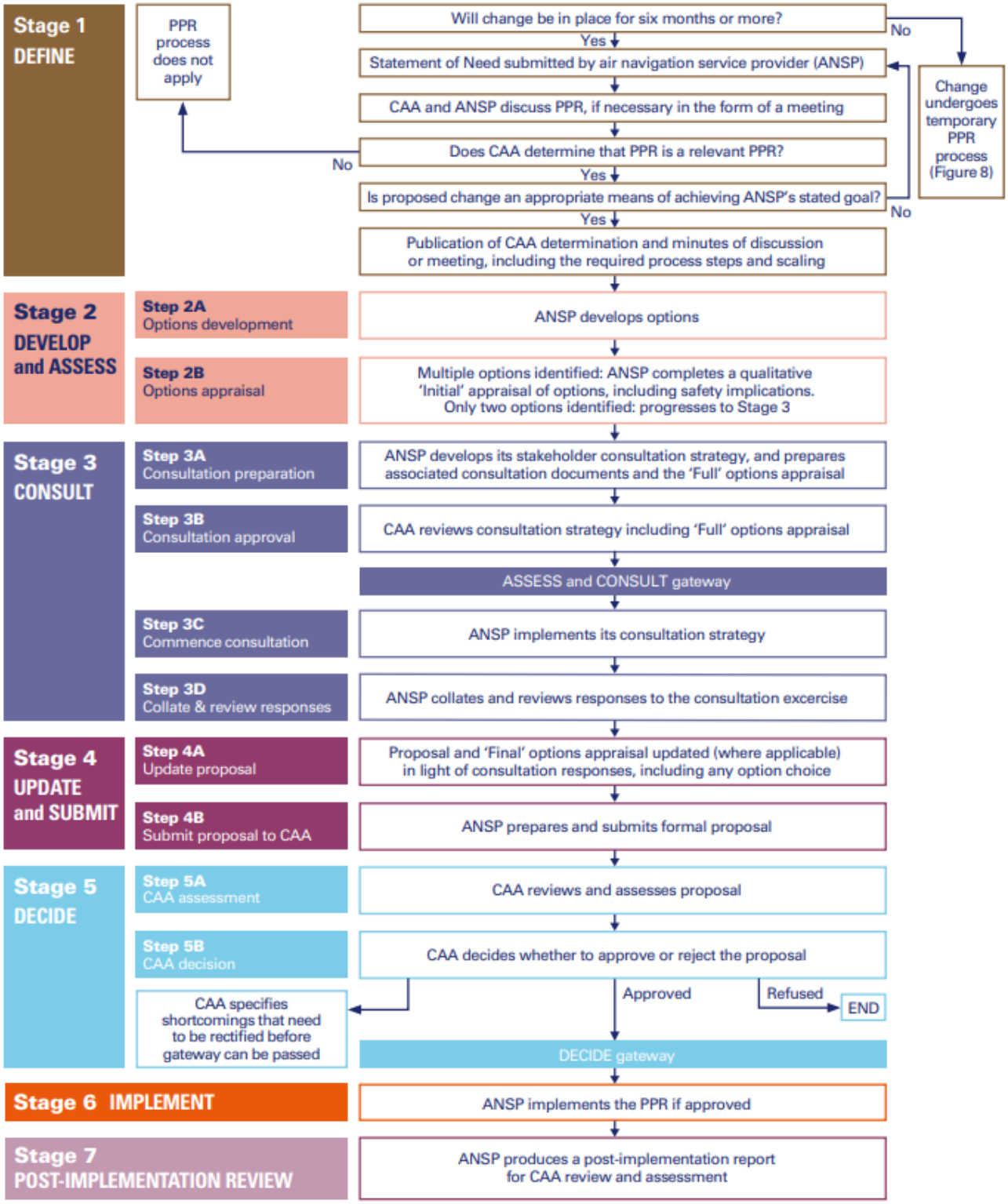
PPR process differences from the CAP1616 airspace change process

3.48 For a PPR, the post-implementation review is carried out by the air navigation service provider rather than by the CAA.

3.49 The air navigation service provider, as the owner of the operational procedures, is better placed to carry out the review. For any change in operational procedure, the air navigation service provider will also, in any event, be continually assessing the operational procedures for operational effectiveness and for safety as part of its ongoing safety management system, irrespective of whether the change is in scope of the PPR process.

3.50 The report produced by the air navigation service provider as a result is reviewed and assessed by the CAA. This is a more proportionate approach given the specific nature of a PPR proposal. In all other respects the principles and process of the post-implementation review remain as set out at Stage 7 in the CAP 1616 airspace change process.

Figure 9 Decision-making process for a relevant PPR



Chapter 4

Temporary PPR changes

Definition

4.1 Specific events or operating conditions may sometimes require a temporary change to written air traffic control operating procedures. This could alter traffic flows and cause a change in noise impacts.

4.2 Temporary changes to airspace design are defined in the Government's Air Navigation Guidance 2017 and Air Navigation Directions to the CAA as lasting not more than 90 days, other than in extraordinary circumstances. They warrant their own scaled process based on paragraphs 2.12 to 2.14 of the Air Navigation Guidance 2017. The Air Navigation Directions do not make any specific provision for temporary PPR changes, and the Air Navigation Guidance 2017 predates the introduction of the PPR process. Although PPR is short for 'planned and permanent', the Air Navigation Directions define 'planned and permanent' as meaning 'other than a day-to-day or at the time decision taken by an air traffic controller or other decision maker'. Therefore even a temporary change in air traffic control operational procedure could be a relevant PPR if it is a written procedure, no matter how short its proposed duration[24].

4.3 Consistent with CAP 1616g, Guidance on Airspace Change Process for Temporary and Trials Airspace Change Proposals, and the Air Navigation Guidance 2017 in respect of a temporary change in airspace design, and to keep the process proportionate to its aims, we apply a significantly shorter process for PPR proposals that are genuinely of temporary duration. This allows the air navigation service provider to programme planned maintenance that will temporarily remove a ground navigation aid from service, for example, without having to carry out extensive advance planning perhaps years in advance for little benefit. It also allows for specific temporary events that might give rise to a PPR.

4.4 Planned maintenance of ground-based navigation aids – which would be a common reason for a temporary PPR – could take longer than three months. The temporary PPR process therefore applies to PPR proposals with a duration of up to six months. Six months also aligns better with the Temporary Operating Instructions an air navigation service provider uses to implement a temporary change in air traffic control operational procedure.

[24] The Department for Transport is content with this approach.

4.5 Type 1 and Type 3 PPRs do not have any temporal element; the criteria in the Air Navigation Directions are based on changes in the tracks flown by aircraft over the ground, so a temporary change is a possibility. A Type 2 PPR requires a shift of 5,000 movements in a year, which is more likely to exclude a PPR change lasting not more than six months.

4.6 The distinction from an airspace trial should be noted. A temporary PPR is used to meet a need for a specific event or operating conditions for a short period. An airspace trial is where innovative air traffic control operational procedures are being trialled or their performance and effect is being tested.

PPR process differences from the CAP1616 airspace process

4.7 Consistent with the process in CAP 1616g, Guidance on Airspace Change Process for Temporary and Trials Airspace Change Proposals, itself based on the Air Navigation Guidance 2017, communities that may be affected by a proposed temporary PPR change are informed prior to the change being implemented, but not consulted.

4.8 Aviation stakeholders are also informed but, unlike CAP 1616g, Guidance on Airspace Change Process for Temporary and Trials Airspace Change Proposals, there is no requirement to consult them formally. This keeps the process proportionate in recognition that prior to the introduction of the PPR process from 1 February 2020, there was no formal requirement to consult aviation stakeholders about a change in air traffic control operational procedure.

4.9 The temporary PPR process comprises the following stages:

- the air navigation service provider submits a Statement of Need to the CAA and discusses the proposal with the CAA
- the air navigation service provider will be required to carry out the noise assessment
- the air navigation service provider will be required to identify stakeholders potentially affected
- the air navigation service provider will be required to inform those stakeholders of the temporary change and potential impacts, and to set out to them its plans for engagement and monitoring of feedback should the temporary change be implemented
- the air navigation service provider will provide evidence of the above to the CAA in seeking approval
- subject to the CAA giving its approval, the air navigation service provider implements the change for a three-month period, complying with any conditions in that approval

- while the temporary change is in operation, the air navigation service provider undertakes regular engagement with affected stakeholders to collate and monitor feedback during its operation to report to the CAA
- if necessary the CAA will give notice of withdrawing its approval based on the feedback report
- the CAA will consider extending the approval for a further three months after assessing the need for an extension and the feedback report
- after the temporary period has expired, the operational procedures revert back to their original form
- only in extraordinary circumstances would the CAA agree to any further extension beyond six months; however, a proposal to extend a temporary change must not be seen by an air navigation service provider as a means of avoiding the full PPR process, which would normally be required for a change of more than six months' duration.

4.10 The process is scalable, so short-duration or low impact changes can be processed relatively quickly.

4.11 To qualify for the temporary PPR process, the air navigation service provider must confirm that the change is reversible, to allay the fears expressed to us by communities that the usual PPR process could be bypassed by claims that it is not possible to revert to previous operational procedures.

Urgent national security or safety-critical changes

4.12 As with the full PPR process, urgent national security or safety-critical changes can be implemented immediately subject to CAA safety oversight requirements, providing that a Statement of Need for any change subsequently assessed as a relevant PPR is submitted to the CAA within four weeks of the Temporary Operating Instruction for the change being issued, and the change then following the usual PPR decision-making process.

Figure 10 Decision-making process for a temporary relevant PPR