

UK NATIONAL PERFORMANCE PLAN FOR AIR NAVIGATION SERVICES

Written Consultation BAA Response document

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Status:

- 1. Do you think the general approach and level of ambition in scope and targets in the draft NPP is right ? If not please explain why.**

BAA supports the general approach to the elements “in scope” and approach to targets. Although we feel that the UK Capacity Target makes adequate contribution to the European capacity target we do think it will be challenging as the UK has more airspace constraints and the UK target was based on historic delay data generated as part of the

performance regime. This data contained some significant anomalies which arose during periods of disruption which were then discounted. We therefore recommend that all the “delays” that effect the difference between the take-off time requested by the aircraft operator in the last submitted flight plan and the calculated take-off time allocated by CFMU should be considered for the purpose of setting this target.

We welcome the suspension or modification of the capacity KPI during a National Security Period and the proposal for no capacity alert mechanism. We support the lower target during the Olympic period and we also support the principles of improving environmental performance during RP1 through the use of CDO's and application of CCO's, FAS and FAB initiatives and through better routings and trajectories. However, any UK commitments should contain sufficient flexibility to be supportive of individually sponsored airspace changes and should set environmental priorities that look beyond the targeted emissions reduction of 10% on average per flight by 2010 and take adequate account of local community issues. e.g. noise and local air quality. Finally we support that the UK is not required to set a national environment or safety target.

We are pleased to see that financial incentives have been included to drive down delay and encourage capacity investments.

2. Do you think the draft NPP demonstrates consistency with the EU performance targets? If not how should the plan be amended.

The UK capacity target is more ambitious than the EU capacity target and we therefore recommend that further consideration be given to:

- Ø the UK airspace constraints
- Ø all the “delays” that impact this target before a significant targeted reduction is proposed.

Neither is there an environmental or safety target in the plan which is consistent with the EU approach. The EU safety targets represent what are considered the performance metrics for risk based oversight of ANSP's in the EU. HAL supports the CAA's proposal to track only six **safety** PI's for RP1 as an aid to enhancing ATM safety levels which have been drawn from the MOR scheme as “lagging” indicators of the frequency of safety events.

3. Do you consider that the inclusion of the additional six UK specific Safety PI's (S4-S9) will contribute to the overall safety performance of ANS in the UK ?

The use of the additional specific UK Safety PI's will contribute to the overall safety performance of ANS in the UK by providing a system for reporting, collecting and tracking progress against additional Safety PI's. Reporting alone will not bring change and change requires actions. The six UK specific Safety PI's are already reported by MOR and this proposal will serve to centralise the reporting. However they could be further enhanced by the use of a bespoke set of metrics that look beyond the MOR scheme and reflect such items as:

- Ø Birdstrike
- Ø Wake vortex encounters
- Ø Air prox
- Ø Deviation from ATC clearance

- Ø Unauthorised penetration of airspace
- Ø Maximum tolerable probability of ATM contributing to an accident

4. Are there any components/aspects of the draft NPP that require more explanation?

The CCO's and CDO's require more explanation in order for us to understand when in flight these will be implemented and the likely environmental impacts they may have. Also requiring further explanation is the financial incentive for NERL to develop a flight in efficiency metric and metric's tool (see page 27,42, 74 and 134). We would like a better understanding as to who is going to be using it, and the proposed targets.

5. Are there any specific key performance areas/indicators you would like to see captured by the NPP for RP2 ?

In preparation for RP2 the UK will, during RP1, monitor and report on three other PI's with no specific targets attached, in the area of terminal and airport **capacity**. C5 focused on ATFM delays attributable to terminal and airport ANSP's, C6 focuses on the additional time in the taxi out phase and C7 focuses on the additional time spent in Holding stacks. For the Taxi out and the Holding stack phase the distribution times and probability density function should be examined.

Heathrow will shortly be completing their implementation of CDM and Airports such as Gatwick and Manchester also have plans in place to implement CDM. Therefore it seems sensible to monitor other PI's such as:

- Ø CTOT compliance
- Ø TSAT distributions
- Ø TOBT adherence

Currently there are no proposed **environmental** PI's in the NPP for monitoring and reporting. For RP1 PI's should be established that indicate the balance between the differing environmental trade-offs. e.g. noise, local AQ and CO2.

In addition some PI's that reflect the milestones in the deliver of FUA should be included as this contributes to the achievement of the capacity and environment targets in ATM performance.

6. Do you have any other comments on the draft NPP ?

- The targets and PI's should be consistent with the implementation programme of the UK's Future Airspace Strategy and SESAR. The KPI's for ANS performance at Airports, for RP2 should be based upon proven data and not taken in isolation. If taken in isolation, there is a risk that we see "cherry picking" of KPI's and do not achieve a balanced set. This is the only way of highlighting the different airport models/mode of operation.

- We recommend that the proposed 3D flight inefficiency metric (E1), which is under development, is only proposed for adoption when it is fully understood by the CAA, NERL. Heathrow Airport anticipates that during RP1, this will include a full environmental impact assessment explaining the environmental trade-offs between local air quality, noise and CO2 and that the airport authority will be consulted on the use of this metric prior to adoption.
- Unlike the UK, we understand the rest of Europe is having difficulty in adapting to the SES performance requirements and that only approximately 25% of Airports have started to provide Airport data for the purpose of monitoring during RP1. From our involvement through the ATMAP group we also understand that there are still unresolved issues in relation to the data which is being requested. Issues include duplication of effort and data validity (e.g. reasons for cancellations and delay codes). We therefore recommend that a full review of RP1 is carried out before we develop the KPI's and PI's for RP2.