

The UK National Performance Plan for Air Navigation Services

Consultation Comments

The consultation for Review Period 1 (RP1) is more for En-Route and not such an impact on aerodromes. The aerodromes will be more involved for RP2. The document details environmental and safety performance indicators but is vague in all aspects of how these will be achieved. There is also a lack of detail in terms of targets, but the document goes onto explain that in some cases the UK does not have a requirement to implement these. This leaves the whole aspect concerning environment and safety improvement a little woolly.

- 5.1 do you think the general approach and level of ambition in scope and targets in the draft NPP is right?

There NPP needs to state what levels of enforcement and adherence will be applied but mindful that safety PI's, if treated like cost PI's, may become illusive in benefit and may reduce the intended safety improvement as "figures" or PI's are aimed for. This needs to be clarified. The scope of targets does state in real terms what the ambition is and much of the scope is vague. Some factors are under review which understandable but an understanding in more detail is required even if only as an intention of what may be achievable in the future.

- 5.2 Do you think that the draft NPP demonstrates consistency with EU performance targets?

The elements relating to safety performance (para 62) and the proposed established safety KPI's (para 63) shall need to be consulted with industry. The element of providing safety performance indicators will need absolute clarification to be effective and not force a negative safety management process which in the short and medium term will have the opposite effect for the sake of achieving PI statistics

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

The management of the six safety PI's will need to be clearly laid out in terms of expectations, where some of the accountable parties may be the cause (e.g. not NERL or airports) the implementation of processes to improve each of the safety PI's must be (a) achievable (b) effective, in real terms to realise true safety benefits. For example, Level Busts are not managed they are reported, effective management processes for safety improvement do not exist.

Para 69(a) – how this will be achieved in the London TMA will be challenging and while airports will support this incentive, the proposal to meet this initiative needs to be further explained.

Para 69 (b) – there needs to be a strategy for PR-NAV and some definitive movement and targets for UK airspace users to achieve a performance based program based upon implementation of PR-NAV. What is this and when can the first stages be expected for implementation?

Para 69 (c) - For environmental targets the improvements for CCD and CDA is commendable and the intended improvement (0.75 percentage point) is not ambitious enough. However, a real improvement in percentage points cannot be achieved with current airspace infrastructure or across peak hours in the London TMA.

Para 69 (d) is a high level statement and needs to be explained in detail of how it will be achieved and what measures will be in place to manage capacity at the same time.

Para 72 - the Figure 15 table indicates performance measures such as “reduced”, “better utilisation” and NPP needs to better determine real measures and achievable targets. The UK does not have to set a national environment target (para 81) but does not offer any tangible proposals.

5.4 Are there any components or aspect of the draft NPP that require more explanation?

The PI's for safety and environment when aligned with cost and capacity efficiencies, need to be explained in how they are going to be achieved. The provision of R-NAV needs to be explained and have defined implementation deadlines. How will these aspects be met during peak hours and as peak hour's increase with growth?

Paragraphs 56 and associated PI's for safety need to determine an expectation and methods to achieve safety while meeting capacity demands

The implementation of “Arrival Management at Airports” (para 69) needs to be explained and methods of implementation explained.

Para 57 – “the greater use of technology” is a broad and vague statement, real measurable thresholds and methods to achieve safety enhancements is not determined and needs to align with the predicted capacity and return to peak traffic flows.

5.5 Are there any specific KPI's you would like to see captured by the NPP for RP2?

A full consultation will be required and specifically as RP2 will be more aligned with airports, should include the AOA but also individual; airports.

5.6 Other Comments?

The proposed EU targets are:

- *Cost-efficiency* - a reduction of the average EU-wide determined unit rate for en route air navigation services from €63.8 in 2009 to €51 in 2014 (expressed in real terms, € 2009), with intermediate annual values of €55.77 in 2012 and €53.33 in 2013. (Approx 4.5% pa)
- *Capacity (delay)* - an improvement of the average en route Air Traffic Flow Management (ATFM) delay so as to reach a maximum of 0.5 minute per flight in 2014.

How will the performance review board force efficiencies, out of the penalties, to ensure UK ANSP's do not suffer where European ANSP's are under performing?

Generally, how will capacity forecasts be met, where improved technology is proposed and other cost cutting reductions, how can cost efficiencies be assured?

Generally – how much cost be born by UK ANSP's considering other EU countries are not as efficient and what is the impact on UK airspace for UK bound and overflights.

Page 65 – If KPI's are not met what short and medium term proposals are intended to address these?

On Page 92 (2) demonstrates that forecast have already proven to be more costly than anticipated, what assurances can be given during further NERL development and restructuring that the cost implication will be met by customers?