

27 March 2015
EIR Reference: E0002210

Dear XXXX

I am writing in respect of your request, of 23 January 2015, for the release of information held by the Civil Aviation Authority (CAA), and your letter dated 13 March.

We have considered your request in line with the provisions of the Environmental Information Regulations 2004 and are able to provide the information below. I am very conscious that you have had to wait a long time to receive a reply from the CAA to your request and for that I apologise.

Your request 1. The number of flights taking off daily in the easterly direction from 2007 to 2015 divided into the designated flight paths as recorded by the Webtrak system covering the aircraft operations at Heathrow currently operating under web page address <http://webtrak5.bksv.com/lhr>.

Please find attached data on the number of flights taking off daily in an easterly direction along each departure route, from 1 January 2007 to 31 January 2015, as recorded by the CAA's Noise and Track Keeping (NTK) system for Heathrow airport. Data in the Heathrow WebTrak system reflects the same information contained in the Heathrow NTK system.

In relation to your letter dated 13 March 2015, it was necessary for the CAA to consult with Heathrow to advise it that it intended to release this information. I take this opportunity to reject your assertion that the delay in responding to your request indicates that the CAA has anything to hide or that there has been any misconduct.

Your request 2. The take-off angles and rates of climb by day of aircraft taking off on each flight path out of Heathrow between the period 1st January 2014 and 1st January 2015.

The CAA does not hold this information.

*Your requests 3-5.
Any directions correspondence and memoranda concerning the alteration of any take-off angles and rates of climb*

Any directions correspondence and memoranda concerning the flight patterns of aircraft in connection with their consumption of fuel or in connection with their exhaust emissions.

Any correspondence and memoranda concerning the flight paths for the Trials or for periods after the Trials that took place in 2014.

Collective response to questions 3-5

The delay in our response results in part from the scope and nature of your request and the consideration we have given to it as an organisation on how best to deal with it. The CAA recognises the public's rightful interest in aviation noise and absolutely acknowledges that the public needs information to enable it to meaningfully participate in that debate.

Nonetheless the CAA has concluded that the broad nature of your request has meant it is impossible for the CAA to deal with it. Heathrow Airport, and NATS as the Air Navigation Service Provider (ANSP) are obviously two of the biggest organisations regulated by the CAA and large numbers of CAA employees will have discussion with employees of Heathrow and NATS about subjects that fall within the scope of your request every day.

We set out below our analysis, under the terms of the EIRs, why the CAA is not disclosing any information in respect of this part of your request.

However we have also set out some information which is aimed at perhaps helping you narrow your request for information if that is what you decide to do.

There is already some information in the public domain, The following links are to information related specifically to the impact of change to the environment resulting from some trials carried out in 2014 and the degree of public consultation required:

https://www.whatdotheyknow.com/request/heathrow_westerly_sid_trial_impa_2#incoming-572741

https://www.whatdotheyknow.com/request/heathrow_easterly_sid_trial_impa_3#incoming-572702

https://www.whatdotheyknow.com/request/heathrow_easterly_sid_trial_impa#incoming-529368

Roles and responsibilities

The CAA is responsible for deciding (after due process) whether to change the notified (or published) airspace structure. There has been no change to the mandatory or notified airspace classification or procedures (i.e. the airspace structure) that is published in the UK Aeronautical Information Publication relating to Heathrow Airport. As the airspace structure has not changed, the CAA has not had any airspace regulation function to perform in respect of the permanent airspace structure around Heathrow.

In your letter dated 13 March you refer to the airspace change process published in CAA's CAP 725 and the 2001 Directions from the Secretary of State to the CAA. These Directions and the CAP 725 process are engaged when there is a change to the notifiable features of airspace only.

ANSPs, the organisations that employ air traffic controllers, are responsible for devising procedures for their air traffic controllers to direct aircraft within the framework of the notified or published airspace structure. For example, air traffic controllers are responsible for directing (known as vectoring) aircraft from 'holds' down onto the ground at runways and the ANSP that employs them is responsible for drawing up the procedures in accordance with which those air traffic controllers will perform that function. As a safety regulator, the CAA certifies and designates ANSPs to provide air traffic services in a particular block of

airspace. As part of that role the CAA will have continual discussions with ANSPs (in this case NATS) about the safety of their operations and procedures. But that safety role has no legal power to consider the noise resulting from those procedures, only the safety impact. Only the Secretary of State has a power to direct ANSPs in respect of the environmental impact of their operations.

With respect to your letter dated 13 March, changes to these operational procedures are not changes to notifiable features of airspace and do not therefore engage the CAP 725 process.

CAA Decision with respect to the information disclosure request under the EIRs

The information you have requested is wide-ranging and extensive, and would require the consumption of considerable CAA resources to identify, collate, assess and prepare for disclosure all the information, largely e-mails, which it had in scope of your request.

Regulation 12(4)(b) of the EIR provides that a public authority may refuse to disclose information to the extent that the request for information is manifestly unreasonable and the CAA considers that this exception applies in this case (a copy of this exception can be found below).

I have outlined the factors that the CAA has taken into account in reaching this conclusion below.

- The interactions between the CAA, Heathrow Airport Ltd (HAL) and NATS on these issues are wide ranging and involve a number of CAA departments. As well as the 2014 trials, relevant correspondence may be held in relation not only to the CAA's role in regulating ANSPs, but also to the safety regulation of Heathrow airport itself, the development of policy on air traffic issues and the work of the CAA's Environmental Research and Consultancy Department (ERCD) which carries out research and analysis in relation to aviation noise.

Retrieving the information

- An initial assessment has identified in excess of 100 people that would have to search their records to see what relevant information they hold.
- While under the EIR there is no appropriate cost limit above which public authorities are not required to deal with requests for information, the ICO's guidance on Regulation 12(4)(b) states '*In assessing whether the cost, or the amount of staff time involved in responding to a request, is sufficient to render a request manifestly unreasonable the FOIA fees regulations may be a useful starting point*'.
- Given the number of people that may hold relevant information, it is estimated that the time it would take to complete the activities that can be taken into account in determining whether the appropriate limit is exceeded in relation to a Freedom of Information (FOIA) request (i.e. locating, retrieving or extracting the information) would considerably exceed the appropriate limit for a FOIA request of £450, or 18 hours.

Assessing/redacting the information

- Some of the information is likely to need to be assessed as to whether an exception to disclosure applies and whether the public interest favoured disclosure or maintaining the exception. In particular:
- Much of the information is potentially commercially sensitive or confidential information relating to HAL or NATS.

- Significant consultation with third parties would be necessary, primarily with HAL and NATS.
- All of the emails contain personal information

As well as the considerable time that would be required to collate the information, consult third parties, consider whether any exceptions apply and redact information, the CAA has also considered the overall effect that this would have on the organisation.

The information requested is complex, and much of the assessment of the information and consultation with third parties would have to be carried out by specialist subject matter experts. Complying with your request would require a significant diversion of resources away from ongoing work and would result in a significant and disproportionate impact on our core operations.

Taking all of the above factors into account, the CAA considers that the exception contained in Regulation 12(4)(b) of the EIR, which provides that a public authority may refuse to disclose information to the extent that the request for information is manifestly unreasonable, is engaged.

The public interest

We have also considered whether, in all the circumstances of the case, the public interest in maintaining the exception outweighs the public interest in disclosing the information.

There is a general public interest in the disclosure of environmental information to promote the transparency and accountability of public bodies and their decision making, greater public understanding and awareness of environmental issues, a free exchange of views and more effective public participation in environmental decision making. In this particular case, the CAA recognises the public interest in greater awareness and understanding of aviation noise issues in order that the public can properly and fairly contribute to the important public debate on these issues.

The public interest in maintaining the exception lies in protecting public authorities such as the CAA from exposure to a disproportionate burden in handling requests for information and its impact on core operations and, as has been explained above, the burden of responding to this request would be significant and disproportionate.

Having considered the public interest factors on both sides the CAA has concluded that, in all the circumstances of the case, the public interest in maintaining the exception outweighs the public interest in disclosing the information.

If you are not satisfied with how we have dealt with your request in the first instance you should approach the CAA in writing at:-

Caroline Chalk
Head of External Information Services
Civil Aviation Authority
Aviation House
Gatwick Airport South
Gatwick
RH6 0YR

caroline.chalk@caa.co.uk

The CAA has a formal internal review process for dealing with appeals or complaints in connection with requests under the Environmental Information Regulations. The key steps in this process are set in the attachment.

Should you remain dissatisfied with the outcome you have a right to appeal against the decision by contacting the Information Commissioner at:-

Information Commissioner's Office
FOI/EIR Complaints Resolution
Wycliffe House
Water Lane
Wilmslow
SK9 5AF
www.ico.gov.uk/complaints.aspx

If you wish to request further information from the CAA, please use the form on the CAA website at <http://www.caa.co.uk/application.aspx?catid=286&pagetype=65&appid=24>.

Yours sincerely



Mark Stevens
External Response Manager

CAA INTERNAL REVIEW & COMPLAINTS PROCEDURE

- The original case to which the appeal or complaint relates is identified and the case file is made available;
- The appeal or complaint is allocated to an Appeal Manager, the appeal is acknowledged and the details of the Appeal Manager are provided to the applicant;
- The Appeal Manager reviews the case to understand the nature of the appeal or complaint, reviews the actions and decisions taken in connection with the original case and takes account of any new information that may have been received. This will typically require contact with those persons involved in the original case and consultation with the CAA Legal Department;
- The Appeal Manager concludes the review and, after consultation with those involved with the case, and with the CAA Legal Department, agrees on the course of action to be taken;
- The Appeal Manager prepares the necessary response and collates any information to be provided to the applicant;
- The response and any necessary information is sent to the applicant, together with information about further rights of appeal to the Information Commissioners Office, including full contact details.

Regulation 12 of the Environmental Information Regulations 2004

- (1) Subject to paragraphs (2), (3) and (9), a public authority may refuse to disclose environmental information requested if—
- (a) an exception to disclosure applies under paragraphs (4) or (5); and
 - (b) in all the circumstances of the case, the public interest in maintaining the exception outweighs the public interest in disclosing the information.
- (2) A public authority shall apply a presumption in favour of disclosure.
- (3) To the extent that the information requested includes personal data of which the applicant is not the data subject, the personal data shall not be disclosed otherwise than in accordance with regulation 13.
- (4) For the purposes of paragraph (1)(a), a public authority may refuse to disclose information to the extent that—
- (a) it does not hold that information when an applicant's request is received;
 - (b) the request for information is manifestly unreasonable;
 - (c) the request for information is formulated in too general a manner and the public authority has complied with regulation 9;
 - (d) the request relates to material which is still in the course of completion, to unfinished documents or to incomplete data; or
 - (e) the request involves the disclosure of internal communications

	Count of easterly Heathrow departures by route (Runway 09L and 09R)																								
Date	09LBPK	09LBUZ	09LCPT	09LDET	09LDVR	09LMID	09LMID1P	09LMID1Q	09LMID2Q	09LSAM	09LSAM1Q	09RBPK	09RBUZ	09RCPT	09RDET	09RDVR	09RMID	09RMID1M	09RMID1N	09RMID2N	09RPBUG	09RSAM	09RSAM1N		
18/01/2007																	1								
22/01/2007												151	125	80		167	107					29			
23/01/2007												150	109	100		159	107					29			
24/01/2007												92	61	75		103	85					22			
25/01/2007												132	102	96		168	108					42			
26/01/2007																1									
29/01/2007																	1								
02/02/2007												71	50	45		82	54					14			
03/02/2007												1	134	72	73		148	91					33		
04/02/2007												166	93	87		155	100					38			
05/02/2007																1									
08/02/2007												37	27	29		43	32					9			
09/02/2007												132	127	76		185	103					33			
10/02/2007												79	95	31		115	54					24			
13/02/2007												36	18	8		39	23					3			
14/02/2007												21	14	4		19	15					7			
16/02/2007												156	128	78		162	110					30			
17/02/2007												149	92	85		158	111					35			
18/02/2007												161	100	84		160	106					38			
19/02/2007												160	127	80		157	113					28			
27/02/2007												19	14	4		16	15					3			
02/03/2007												56	40	21		70	45					9			
03/03/2007																1									
04/03/2007												109	92	62		121	82					27			
11/03/2007												1													
23/03/2007												124	102	78		135	108					35			
24/03/2007												147	99	72		155	110					42			
25/03/2007												140	108	81		169	116					31			
26/03/2007												156	123	90		161	113					27			
27/03/2007												150	135	74		180	109					33			
29/03/2007												1				1									
30/03/2007												143	128	86		171	111					33			
31/03/2007												116	87	82		171	105					34			
01/04/2007												135	88	95		188	108					42			
02/04/2007												138	99	111		181	107					35			
03/04/2007												146	95	115		179	105					33			
04/04/2007												145	101	110		171	108					36			
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11/04/2007												66	34	28		63	45					11			
12/04/2007												174	112	95		181	76					38			
13/04/2007												152	130	86		155	109					30			
14/04/2007												112	77	86		154	87					25			
15/04/2007												136	119	73		184	114					40			
16/04/2007												115	92	58		130	87					38			
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28/09/2007									176	140	76		133	107					47	
29/09/2007									163	116	69		150	108					42	
30/09/2007									163	90	70		127	94					39	
01/10/2007									202	122	96		116	112					32	
02/10/2007	1								198	127	82		126	110					38	
05/10/2007									145	116	67		132	105					40	
06/10/2007									139	84	97		170	95					38	
07/10/2007	1	1	1						172	93	103		144	110					33	
08/10/2007									97	79	28		43	59					15	
10/10/2007									152	108	77		138	94					36	
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22/10/2007									104	58	47		91	67					23	
23/10/2007									162	104	93		161	114					46	
24/10/2007									175	119	51		142	101					79	
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23/11/2007									92	65	40		92	67					28	
13/12/2007									151	135	68		177	108					38	
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16/12/2007									141	108	66		160	104					40	
17/12/2007									171	114	82		149	101					39	
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24/06/2008									157	151	77		166	97				29	
04/07/2008									47	36	20		72	38				11	
05/07/2008									17	10	3		18	13				6	
09/07/2008									14	16	11		16	12				2	
23/07/2008									114	94	76		120	74				22	
24/07/2008									148	131	76		149	92				30	
25/07/2008									43	49	20		45	35				9	
28/07/2008									160	157	70		137	109				33	
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30/07/2008									30	31	19		43	25				8	
31/07/2008									152	165	66		163	99				29	
06/08/2008									8	8	9		12	3				2	
12/08/2008									11	14	1		14	13				4	
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27/09/2008									133	69	54		124	95				69	
28/10/2008									23	6	4		15	4				3	
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01/11/2008									133	87	94		160	94				39	
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04/11/2008	1								139	114	95		173	93				32	
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24/11/2008									116	85	93		153	80				32	
25/11/2008									1										
28/11/2008									89	85	69		115	58				26	
29/11/2008									128	95	81		163	89				37	
30/11/2008									122	104	89		188	93				37	
13/12/2008									104	110	68		123	117				36	
14/12/2008									57	30	24		57	49				12	
15/12/2008									137	123	49		145	121				75	
25/12/2008									43	16	52		91	48				17	
26/12/2008									125	79	106		117	103				33	
27/12/2008									127	64	98		119	114				44	
28/12/2008									157	77	95		109	107				39	
29/12/2008									136	92	93		133	93				31	
30/12/2008									140	110	74		120	108				33	
31/12/2008									98	77	91		109	94				23	
01/01/2009									110	75	100		110	97				28	
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06/09/2010								157	160	54		185	90				32	
01/10/2010								50	42	32		56	38				11	
02/10/2010								79	52	38		84	47				17	
03/10/2010								71	54	30		66	34				14	
07/10/2010								141	99	79		120	79				25	
08/10/2010								172	108	102		136	120				34	
09/10/2010								137	86	104		164	114				31	
10/10/2010	1							132	71	73		128	104				26	
11/10/2010								167	115	96		166	89				31	
12/10/2010								188	107	107		193	39				38	
13/10/2010								178	98	113		147	96				33	
14/10/2010								161	88	108		134	92				29	
16/10/2010								60	29	38		74	46				18	
17/10/2010								61	23	33		62	22				11	
30/10/2010								34	10	8		34	28				8	
31/10/2010								153	96	88		139	129				38	
07/11/2010								114	73	49		113	82				52	
08/11/2010		1						147	136	45		129	104				26	
09/11/2010								149	108	92		149	119				36	
10/11/2010												2	1					
16/11/2010								45	23	16		43	36				10	
17/11/2010								173	127	72		131	109				30	
18/11/2010								145	136	69		140	105				31	
19/11/2010								61	40	19		68	53				14	
20/11/2010								149	91	91		148	122				31	
21/11/2010								161	100	87		159	116				35	
22/11/2010								150	109	92		153	118				30	
27/11/2010								119	74	89		144	98				27	
28/11/2010		1						171	75	97		134	130				34	
29/11/2010								144	92	86		148	126				28	
30/11/2010	3	6	2	1				127	76	89		124	97				28	
01/12/2010	8	8	14	11	5		4	147	61	93		122	89				23	
02/12/2010				1				118	47	112		133	86				28	
03/12/2010			2				1					1						
07/12/2010								164	86	103		146	113				31	
08/12/2010								92	61	68		75	63				19	
12/12/2010								86	51	65		113	77				22	
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12/11/2011								164	77</									

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06																			

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28/07/2014								156	97			160			91	107	1	48	
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26/08/2014								128	88	112		141			105	1	28		
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