

1 AUGUST 2014

Abigail Grenfell  
Regulatory Policy Advisor  
Civil Aviation Authority  
CAA House, 45-59 Kingsway  
London, WC2B 6TE

Dear Abigail,

**CAA consultation on additional guidance for operational resilience plans**

We welcome the opportunity to comment on the CAA's revised guidance on Gatwick Airport Limited's operational resilience plans. As you are aware, Gatwick, its passengers and airlines were adversely affected by severe disruption caused by flooding and high winds on Christmas Eve 2013. Following this disruption, the Gatwick Board asked one of its non-executive directors, David McMillan, to undertake an urgent review of the disruption events at the airport on Christmas Eve 2013. His report was published on 26 February 2014, and included 27 recommendations covering flood protection, resilience and contingency planning, passenger welfare, and air traffic control. Gatwick has already implemented a number of these recommendations and is in the process of implementing the remainder.

We note that the CAA's additional guidance, taken together with the CAA's original guidance, covers many of the same issues already addressed by Gatwick, or being addressed through the implementation of the McMillan recommendations. As such, the principles in the CAA's additional guidance are closely aligned with our own approach. However, we have a number of comments on the proposed detailed approach of the CAA, which we consider will have substantial cost implications for the airport, airlines and other airport stakeholders, without the CAA having substantiated the additional benefits that will flow to passengers:

**1. The requirement to undertake four major table top exercise per year as well as a major practical exercise relating to a non-emergency disruption situation every other year**

We consider that to undertake this number of exercises, on this scale and to ensure that they are worthwhile events would lead to significant time and resource implications for Gatwick, without necessarily providing any substantial increase in the resilience capability of the airport community. For example, each major exercise has a direct cost requirement of around £55,000 plus the time requirements of the staff participating. In addition, we are far from certain that our airport partners would have the appetite or resources to commit to this number of events. As previously explained to the CAA, our experience from our annual simulation exercises is that it is difficult to get the required level of buy-in and commitment from all of the required airport stakeholders. Without this wider participation, the value of any such exercise is severely reduced.

# YOUR LONDON AIRPORT

## *Gatwick*

Moreover, in addition to planning and undertaking the exercises, to make the exercises valid and worthwhile there is a need to review the outcomes and then communicate any changes to the plans tested. Given the amount of effort and time required to do this properly, four exercises a year risks a constant cycle of work for the participants and planners. This would have substantial implications for Gatwick, requiring at least one person to work on this full time, who would rely heavily on the help from the airport community and stakeholders to achieve the required outcomes. As noted, it is not clear that our partners will be willing to resource this number of activities nor attend this number of exercises to the appropriate level of participation to make this effective.

We also note that this proposed approach is out of line with industry best practice. For example, under the Civil Contingencies Act the police, NHS etc. are required to carry out a desktop once a year and a full scale live exercise once every three years. Moreover, the CAA's proposed additional guidance does not appear to accept that actual disruption events that occur during a year at the airport would count towards any exercise quota. While such actual events are unpredictable, they do occur and provide valuable learning opportunities in themselves and as such should be reflected in the CAA's additional guidance.

In addition, we note the additional guidance for Heathrow airport is very similar to that for Gatwick airport. Given the scale differences between the two airports and the ability for Heathrow to have exercises in different terminals, the relative burden on Gatwick is much more significant.

### **2. Training, practice and testing regime to be approved by the CAA**

It is not clear to us that the CAA is suitably qualified to audit the training regime. On the basis that this is undertaken by a third party, the CAA should set out the basis on which the third party would be appointed, including the qualities that would be required, and the process by which it would assess the programme content and delivery.

### **3. Requirement to provide an overarching contingency plan document**

It is not clear currently how this requirement would be met as it could take a number of formats. Is the intention that it is for Gatwick to interpret and implement this requirement e.g. this could be satisfied by the provision of an incident and crisis management manual together with individual plans, such as the adverse weather plan (which itself is a combination of different disruption plans)? We consider that it would be beneficial to discuss this separately with the CAA.

### **4. Provision of "backstop" support for passengers**

We agree that there could be situations where the airport needs to provide support to passengers where airlines are failing to undertake their legal obligations to provide passenger welfare in the event of disruption. However, it is not clear what the CAA envisages "backstop" support to include.

### **5. Gatwick should include in its resilience plans obligations on airlines**

Gatwick has been working with its airline partners to develop much closer working relationships in the event of disruption, including the provision of information to passengers. However, we do not

# YOUR LONDON AIRPORT

## *Gatwick*

see how we can place “obligations” on airlines, as we have no authority over how they communicate with passengers. The CAA’s additional guidelines should reflect this fact.

### **6. Review of disruption events and exercises**

Gatwick has a comprehensive approach to learning lessons from disruption events. However, the scale of some disruption events do not justify the time and cost implications of using an external reviewer. This service should be utilised on a case by case basis when justified.

### **7. Monitoring report**

While we agree in principle with the provision of a monitoring report, we will only be in a position to comment on this in detail when the CAA consults on the structure proposed by the CAA. As a guiding principle, this should not be excessively bureaucratic.

We would welcome the opportunity to discuss our response with you, should you find this useful.

Yours sincerely,



Andrew Williams-Fry  
Chief Economist &  
Head of Regulatory Strategy