

**AIRSPACE CHANGE PROPOSAL CONSULTATION ASSESSMENT**

<b>Title of Airspace Change Proposal</b>	Stansted RNP(RF) SIDs
<b>Change Sponsor</b>	Stansted Airport
<b>SARG Project Leader</b>	██████████
<b>Case Study commencement date</b>	01/02/2016
<b>Case Study report as at</b>	08/11/2016

**Instructions**

In providing a response for each question, please ensure that the 'Status' column is completed using the following options:

- **Yes**
- **No**
- **Partially**
- **N/A**

To aid the DAP Project Leader's efficient Project Management it may be useful that each question is also highlighted accordingly to illustrate what is resolved ( Green ), **not resolved** ( Amber ) or **not compliant** ( Red ) as part of the DAP Project Leader's efficient project management.

1.	Consultation Process	Status
1.1	<b>Is the following information complete and satisfactory?</b> <ul style="list-style-type: none"><li>▪ A copy of the original proposal upon which consultation was conducted.</li><li>▪ A copy of all correspondence sent by the sponsor to consultees during consultation.</li><li>▪ A copy of all correspondence received by the sponsor from consultees during consultation.</li><li>▪ A referenced tabular summary record of consultation actions.</li><li>▪ Details of and reasons for any changes to the original proposal as a result of the consultation.</li><li>▪ Details of further consultation conducted on any revised proposal.</li></ul>	Yes
		N/A
		N/A

### Executive Summary

The proposal aimed to implement the RNP1 navigation standard to the Stansted Airport 22 Clacton (CLN) and 04 Detling (DTL) SIDs. The proposal was progressed in accordance with the Airspace Change Process following a CAA-approved trial that commenced on 7 May 2013. At Framework Briefing, it was agreed with the CAA that the proposal fell within the criteria of the CAA's SID Replication Policy. As a consequence, it was initially agreed that the Stansted Airport Consultation Committee (STACC) constituted a suitable forum on which to base the required consultation. Following discussions with STACC, Stansted Airport subsequently decided to conduct a full public consultation in excess of CAA requirements. The consultation ran from 01/09/2015 to 27/11/2015 (just over 12 weeks). The consultation was well publicised and the sponsor appeared receptive to the concerns of STACC in delaying the consultation to avoid holiday periods. A number of roadshows were held as part of the consultation process and invitations to attend council meetings were accepted by the sponsor. A comprehensive media coverage exercise was conducted in order to publicise the consultation. The consultation activity met current best practice and government Consultation Principles (2016). All individual responses to the consultation have been read as part of this assessment.

The sponsor received 61 responses to the consultation from the identified stakeholders and members of the public, the majority of which supported the proposal. Some objections were, however, raised. The lack of participation of Ryanair, the majority operator at the airport, in the trial led to suggestions that the true impact of the proposal could not be quantified. From a process perspective, operational trials are not a prerequisite for gauging the impact of an airspace change proposal – in the majority of cases, it is acceptable for change sponsors to predict the environmental impact of a change using various quantitative/qualitative models. In this case, Ryanair was initially unable to participate in the trial due to the lack of regulatory approval by the Irish Aviation Authority, a situation subsequently remedied with the airline now flying the trial procedure. The CAA has received data concerning Ryanair participation from the sponsor during the regulatory assessment period. Further objections concerned the overflight of specific locations, the positioning of the Noise Preferential Routes (NPRs) at the airport and suggestions for repositioning of flightpaths that fell outside of the scope of the proposal given its accepted aim of replication. The change sponsor's response to these objections was satisfactory and, on a number of issues, the sponsor undertook to undertake further dialogue with its local community.

Several expressions of support were caveated with the view that the impact on those living underneath the concentrated routes should not suffer disproportionately. Otherwise, there was general support for the proposal in removing overflight from a large number of the populace, together with suggestions that the RNP1 standard be applied to the other departure routes associated with Stansted Airport.

In conclusion, the change sponsor undertook a comprehensive and well-run engagement exercise comprising pre-consultation engagement and formal consultation in accordance with the CAA's regulatory requirements and consultation best practice. The sponsor was receptive to stakeholders and proper consideration was given to the issues raised.

1.2	<b>Were reasonable steps taken to ensure all necessary consultees actually received the information e.g. postal/e-mail/meeting fora?</b>	<b>YES</b>
<p>Pre-consultation activity commenced in July 2015 with a briefing to STACC on the proposal and its aims. At that briefing it was agreed that the airport would undertake a full public consultation in excess of the CAA's requirements outlined at Framework Briefing and based on the CAA's SID Replication Policy dated 19 August 2013. In initiating the consultation 22 media articles publicised the activity across both online and printed media. The sponsor undertook a number of community roadshows to highlight the consultation and accepted 2 (out of 2) invitations to present to local councils.</p>		
1.3	<b>What % of all operational consultees replied? (Include actual numbers).</b>	<b>- (3)</b>
<p>The airports airline operators worked closely with the airport over the trial period as confirmed by the trial documentation submitted to the CAA as part of the formal proposal. Whilst the number of responses to the formal consultation was relatively low, the stakeholders concerned were intrinsically involved in the proposal and supported it.</p>		
1.4	<b>What % of all environmental consultees replied? (Include actual numbers).</b>	<b>75% (16)</b>
<p>The change sponsor received 58 responses from environmental consultees, 42 of which were from private individuals. Of the primary stakeholders, 16 responded – a noticeably high response rate. In general two-thirds of respondents supported the proposal (albeit with some caveats), whilst one-third objected.</p>		
1.5	<b>Were reasonable steps taken to ensure as much substantive feedback was obtained from the consultees e.g. through follow-up letters/phone calls?</b>	<b>YES</b>
<p>The sponsor initiated 3 newspaper articles in the week preceding the conclusion of the consultation urging people to respond.</p>		

1.6	<b>Have all objections to the change proposal been resolved (or sufficiently mitigated)?</b>	<b>YES</b>
<p>The sponsor correctly identified the issues raised by stakeholders. All objections to the proposal have been adequately dealt with by the sponsor:</p> <p><b>Ryanair not participating in the trial / too few aircraft to appreciate the impact (16 comments)</b></p> <p><i>The numbers of aircraft flying the RNP1 SIDs has been relatively small. However, there is a wide range of aircraft that have flown the RNP1 SIDs that are detailed in the technical report along with the consistent accuracy they are all able to fly. A significant evidence base exists to prove the technology works as intended, with a high degree of accuracy and consistency across a wide range of aircraft types. RNP1 technology is relatively new to the UK and we understand this is the first trial of RNP1 with RF turns to be undertaken. Airlines can only operate RNP1 with appropriate regulatory approval which has proven to be a lengthy process. Aircraft fleet equipage is improving and we anticipate the numbers of aircraft that can operate RNP1 to grow steadily over the coming years.</i></p> <p><i>Ryanair are committed to participating in the trial, their aircraft have the technology aboard and are at present in the process of gaining their RNP1 regulatory approval from the Irish Aviation Authority. Pegasus, which have the same aircraft type as Ryanair, have successfully operated the RNP1 SIDs with an identical track profile to all other aircraft flying RNP1, also as shown in the technical report.</i></p> <p><b>Will any proposed changes be subject to a review process after 12 months? (8 comments)</b></p> <p><i>The CAA will carry out a post-implementation review at a date notified in any approval notice. This is usually after 12 months and consistent with the CAAs Guidance on the Application of the Airspace Change Process – CAP 725.</i></p> <p><b>Supportive providing there is not a disproportionate and unbearable noise impact upon the minority of losers (8 comments)</b></p> <p><i>With any airspace change, there are in most cases winners and losers. A number of responses welcomed the introduction of RNP1 but were concerned this would have a disproportionate effect on the minority of losers. There are no new routes proposed and no new areas will be overflown at low level. London Stansted Airport operates a noise insulation scheme to support those who are most impacted by aircraft noise. The Airport has already committed to reviewing its noise insulation scheme as part of the Sustainable Development Plan consulted on during 2014.</i></p>		

1.6 (cont)	Have all objections to the change proposal been resolved (or sufficiently mitigated)?	YES
	<p><b>Can you direct traffic away from High Easter to the north but within the NPR? (7 comments)</b></p> <p><i>A large number of responses were from the High Easter area and there was a collective theme to review the NPRs, submitting the following comments to the consultation:</i></p> <ul style="list-style-type: none"> <li>• <i>'[The NPRs] had not been revised since the early 1990s and therefore take no account of changed demographics, increased understanding of how noise affects people's health and the growth of traffic over the past 25 years'</i></li> <li>• <i>'Move the tracks to the northern edge of the NPR – 500m"Route aircraft over large communities and roads where ambient noise levels are higher'.</i></li> </ul> <p><i>Whilst the Airport will continue to discuss these comments directly with local community representatives, these suggestions were not within the scope of this project or consultation and have not been considered. Moving aircraft over large communities increases the number of people overflown and is not consistent with Government policy of limiting and where possible reducing the numbers of people effected by noise. The changes proposed for implementing PBN have a material effect on the low level turn as part of the departure routes, else all other elements remain the same, with aircraft vectoring beyond 4,000ft dispersing aircraft across a much wider area.</i></p> <p><b>LAMP 1a Detling to Clacton switch (8 comments)</b></p> <p><i>Some responses suggested that RNP1 would help alleviate concerns relating to the NATS LAMP phase1a project, moving daytime Detling departures to the Clacton routes. Although the projects are not related, Stansted Airport also believes RNP1 implementation will help mitigate some of the effects of this NATS change at low level.</i></p>	

1.6 (cont)	Have all objections to the change proposal been resolved (or sufficiently mitigated)?	YES
<p><b>What other options were considered? (2 comments)</b></p> <p><i>This project came to fruition to address community concerns and improve track keeping at low level by consistently keeping to the NPR centreline. The development of the two RNP1 SIDs was to address community concerns through this improved track keeping and adherence to the NPR centreline. No other options were considered, although the RNP1 SIDs were revised in their design stage to better reflect the NPR centreline.</i></p> <p><b>Will Stansted Airport continue to monitor Air Quality? (2 comments)</b></p> <p><i>Yes, Stansted Airport monitors Air Quality through diffusion tubes at 5 locations and continues monitoring equipment at two locations. This reported annually and statistics are published on the airport website. Our current levels of PM10 and NO2 are well within UK air quality objectives and we will continue to monitor Air Quality at these sites.</i></p> <p><b>This makes noise exposure worse in Hatfield Heath (2 comments)</b></p> <p><i>We do not believe this trial has a negative impact on Hatfield Heath as the design moves aircraft inside the existing SID, further away from Hatfield Heath. Those aircraft that have flown the runway 22 Clacton RNP1 SID have consistently not overflowed Hatfield Heath, as shown in the trial technical report and this situation will improve further still as the technology expands to other operators.</i></p> <p><b>New flight paths have already been implemented (2 comments)</b></p> <p><i>There were 2 responses that highlighted that new flight paths have already been implemented. There have been no changes to routes in the East Berholt area since October 2014 or recently to the Great Notley area. Both of these comments would be consistent with the timings of NATS Consultation in 2014 and the proposed implementation of LAMP Phase 1A.</i></p> <p><b>Combine 04 Clacton to 22 Clacton route earlier to avoid Rayne (1 comment)</b></p> <p><i>The 04 Clacton departure route, which is the closest to Rayne, was not part of this consultation. As and when we develop RNP1 on our other departures routes we will consider if there is any benefit to moving an NPR, in line with government policy at that time. However, we appreciate that long term consistency is fundamental to our local communities which should be equally considered as well as any communities that may experience noise that would at present be largely unaffected.</i></p>		

1.6 (cont)	Have all objections to the change proposal been resolved (or sufficiently mitigated)?	YES
	<p><b>Will this technology be applied to arrival routes? (1 comment)</b></p> <p><i>This trial and consultation was specifically about replicating two of our existing departure routes. However the EU Legislation, Pilot Common Project, as previously mentioned also mandates RNP technology to arrivals. This is something London Stansted will have to implement to comply with this EU legislation but is not currently in our immediate plans.</i></p> <p><b>You are just moving the problem from one area to another (1 comment)</b></p> <p><i>The RNP1 SIDs concentrate departing air traffic within an area contained within the existing NPRs. There are no new areas overflowed as a result of this proposal. Above 4,000ft, the results of the trial have shown the usual spread of traffic through ATC vectoring. Below 4,000ft, the concentration of departures reduces the number of people overflowed by up to 84%, consistent with government policy.</i></p>	

Outstanding Issues		
Serial	Issue	Action Required
	N/A	

Additional Compliance Requirements (to be satisfied by Change Sponsor)	
Serial	Requirement
	N/A

Recommendations	Yes/No
Does the Consultation Report and associated material meet SARG requirements?	YES
The Consultation Report and associated material was well presented and comprehensive, meeting SARG regulatory requirements.	

<b>General Summary</b>
This was a well run consultation, which embodied recognised best practice and included preliminary engagement activity and a comprehensive publicity campaign. That resulted in a high level of response from environmental stakeholders and the sponsor was receptive to the feedback received. The consultation documentation was clear and understandable.
<b>Comments</b>
N/A
<b>Observations</b>
N/A

<b>Consultation Assessment Sign-off/Approvals</b>			
	<b>Name</b>	<b>Signature</b>	<b>Date</b>
<b>Consultation Assessment completed by (Airspace Regulator (Coordination))</b>			<b>09/11/2016</b>
<b>Consultation Assessment approved by (Head AR)</b>			<b>27/01/2017</b>

SARG Comment/Approval		
<b>Name</b>  MARK SWAN	<b>Signature</b> 	<b>Date</b>  17/02/2017