

Response ID ANON-HVP3-66RU-M

Submitted to **Proposals for a revised airspace change process**

Submitted on **2016-06-15 11:48:39**

About you

A What is your name?

Name:

East Grinstead Town Council

B What is your email address?

Email:

j.holden@eastgrinstead.gov.uk

C Where do you live?

South East

D Are you answering this consultation as:

Elected political representative

E Are you affiliated with any organisation? If so, please enter the name of the organisation here:

Please enter the name of the organisation in the text box:

we are members of NALC SLCC adn Gatcom

No

F Is there anything else that you would like us to know about you regarding this consultation?

Please enter any further details:

we are a local council representing residents who live within the Gatwick environs on take off and landing routes

G Do you consent for your response to be published?

Yes, with identifying information

CHAPTER 4: How the CAA is considering revising the airspace change process

1 Will the new process gateways improve the airspace change process?

Don't know

Please give reasons for your answer.:

It is not clear as to whether the new process will be elongated and therefore a more bureaucratic process. While the need to modernise is understood and accepted, the process has many more stages. the largest plus point is the clear indication that the stakeholders consultation will be broadened throughout the process.

Proposals for Stage 1

2 Should the sponsor engage local stakeholders to agree design principles for the airspace change?

Yes

Please give reasons for your answer.:

although this will elongate the process at the beginning the value of the stakeholder engagement early is sensible and supported

3 What types of data would you find it useful for the sponsor to provide when engaging local stakeholders about design principles? How should this data be presented?

Please enter your comments:

flight paths and flying patterns /studies and results as to the expected changes to those affected by the change to greater and lesser degrees

4 In addition to specific detail, what general background information would you find it useful for the sponsor to provide as context for its proposals?

Please enter your comments:

no comments

5 Overall, will Stage 1 improve the airspace change process?

Yes

Please give your reasons and any other views on Stage 1.:

better engagement at the earliest time ensures that all angles are appreciated and considered at the earliest stage.

Proposals for Stage 2

6 Will introducing the options appraisal we propose improve the airspace change process?

Yes

Full

Please provide your reasons:

early and full assessment of options should allow discarding of poor ideas or design early. The better the data and detail at the beginning the easier the decision making should be and the more robust and understood

7 Overall, will Stage 2 improve the airspace change process?

Don't know

Please give your reasons and any other views on Stage 2.:

without understanding of what this really means we are unable to comment

Proposals for Stage 3

8 Would an independent third-party facilitator make a sponsor's consultation more effective?

Yes

If so, should a facilitator be a mandatory requirement for certain types of airspace change? Please give your reasons and any other views (including benefits and disbenefits) on facilitators.:

qualified and appropriate independent 3rd parties are welcomed providing the process does not become unwieldy which is the concern.

9 Should the CAA publish all consultation responses in full, except to moderate them for unacceptable content?

Yes

Please give reasons for your answer.:

those who wish to respond should expect publication.

10 Should the CAA publish airspace change consultation responses as they are submitted, rather than at the end of the consultation period?

Don't know

Please give reasons for your answer.:

We don't know that it makes any real difference

11 Should consultation responses be made solely through the online portal?

No

Please give reasons for your answer.:

questionnaires are not always appropriate where only short points or answers are necessary from some residents or groups

12 Do you think that the consultation process proposed in Stage 3 achieves the right balance between fairness, transparency and proportionality?

Yes

Please give reasons for your answer.:

while it is difficult to be sure, the approach would appear to be fair and transparent.

13 Overall, will Stage 3 improve the airspace change process?

Don't know

Please give your reasons and any other views on Stage 3.:

We would like to think so, however it is only in the trying of a new system that this will tell.

Proposals for Stage 4

14 Should sponsors be required to adhere to a standard template for their airspace change submissions?

No

Please give reasons for your answer.:

templates are not always the most useful but a required format, such as headings may be helpful to bring some uniformity and ease of understanding.

15 Is it reasonable for the CAA to publish a redacted version of the submission, with commercially sensitive details removed, as soon as we receive it, before we have assessed it and decided upon it?

No

Please give reasons for your answer.:

It will be more useful for the assessment and decision to be provided at the same time as the document to avoid misunderstandings of proposal or changes that are not later implemented.

16 Overall, will Stage 4 improve the airspace change process?

Don't know

Please give your reasons and any other views on Stage 4.:

no further comment

Proposals for Stages 5 and 6 (including Public Evidence Session and Appeal discussions)

17 Will introduction of a new Public Evidence Session improve the airspace change process?

Don't know

Please give reasons for your answer.:

no comments

18 Is Step 5B (CAA decision) a clear and transparent way of making an airspace change decision?

Yes

Please give reasons for your answer:

based on the information given it would appear to be

19 Overall, will Stage 5 improve the airspace change process?

No

Please give your reasons and any other views on Stage 5.:

it simply seems to add more layers an oversight committee as described simply seems to be more unwieldy and builds in delays

20 What are your views on our proposal not to introduce an appeal against process irregularities into the airspace change process?

Please enter your comments below.:

We think that appeal processes always allow for an opportunity to review, however this must be based on Wednesbury principles and not allow appeal for appeal sake or to act as a delaying tactic by those dissatisfied with the decision itself.

Proposals for Stage 7 (including Oversight Committee discussion)

21 What types of data would you find it useful for the sponsor to provide, and in what form, when seeking feedback for its post-implementation review?

Please enter your comments below.:

no additional comments

22 Overall, will Stage 7 improve the airspace change process?

Don't know

Please give your reasons and any other views on Stage 7.:

no additional comments

23 Overall, will the airspace change process proposed in Chapter 4 achieve the right balance between fairness, transparency and proportionality?

Yes

Please give reasons for your answer.:

it would appear to do so

24 Should the CAA set up an Oversight Committee?

No

Please enter your comments:

We have reservations as to the effectiveness of this as per earlier response

Summary of guidance for the proposed process

25 Are there any other areas where the CAA should provide guidance?

No

Please give reasons for your answer:

we can't think of other areas

CHAPTER 5: Scaling the airspace change process

26 Does Table 5.1 give sufficient clarity and detail of how the process will be scaled?

Yes

Please give reasons for your answer:

it is clear as to which process will be followed

27 Do you have (i) any views on the way the Levels are categorised in Table 5.1, (ii) alternative suggestions as to how we might categorise different airspace changes, or (iii) other views about the proposed scaling of the process generally?

Please enter your comments below.:

none

28 Do you agree that the number of airspace change proposals put forward to the CAA is likely to increase in the future?

No

Please give reasons for your answer:

The review should be extensive and forward looking to be futureproofed. We are told that the airspace has not had major reviews since the 1940's. It is appropriate that a full review be carried out and future proofed based on agreed strategies such as growth at airports. This should ensure that change proposals should be kept to a minimum and not subject to frequent change.

CHAPTER 6: CAA duties when carrying out our airspace functions under section 70 of the Transport Act 2000

29 Do you have any views about the CAA's interpretation of section 70 of the Transport Act 2000, as set out in Chapter 6?

Please enter your comments below.:

we support the over riding theme of safety first, with increased air travel and movements commercial success and profits must always be second to air safety.

CHAPTER 7: CAA cost recovery for administering the airspace change process

30 Do you have a preference for either of the long-term options for recovering the CAA's airspace change costs that are set out in Chapter 7? Please give your reasons and any other views on how the CAA recovers its airspace change costs.

Option 1: UK en route unit rate

Please enter your comments:

option 1 is a regulated method with no possible influence from those with vested interests. sharing the load. However there should be a built in increase or more regular review period to ensure that the costs are not outstripping the levy. This situation is unacceptable. However method 2 of a statutory charge on the sponsor suggests influence.

31 In the short term the CAA will still have to set up a new statutory charge. On which entity would it be most appropriate to levy this charge? Please give your reasons.

UK airlines

Please enter your comments:

the users of the airspace

CHAPTER 8: Transition to a new process

32 Are our proposed transition arrangements between the old process and the new process reasonable?

Yes

Please provide any further comments or evidence that would inform our proposed transition arrangements.:

the approach seems reasonable

CHAPTER 9: Next steps

33 Are our timescales for introducing the new process reasonable?

Yes

Please give reasons for your answer:

thorough and due diligence must be undertaken before decisions are made but without untimely delays.

Appendix B: A portal for airspace change proposals

34 Do you agree with the concept of an online portal?

Don't know

Please give reasons for your answer.:

The danger of portals is that consultation overload becomes the norm against pre determined questions and format. An opportunity to submit comments in the preferred method of the respondent should be accommodated alongside any portal and the use of the portal (how often it will be used) should be determined so as not to create overkill.

35 Should the online portal contain any functionality beyond what we describe or documentation other than that shown in Table B1?

Please enter your comments below.:

as above

36 What are your views on locating the sponsor's consultation on a CAA portal where the sponsor administers the documentation and responses?

Please enter your comments below.:

providing there are strict protocols to protect integrity of data (to protect all involved) this would not be a concern.

37 Is it essential that the online portal is a single website or could different websites (CAA, sponsor, consultation portal) be used for different aspects of the process?

Yes

Please give reasons for your answer.:

keep it in one place to avoid confusion

38 Do you have any views on the CAA's analysis of the three options for an online portal, bearing in mind that the CAA will need to recover its costs through charges on those it regulates?

No

Please give reasons for your answer.:

nothing to add

Appendix D: The impact of the CAA's proposals

39 Is our assessment of the effects of the new process in Table D1 reasonable?

Don't know

Please enter your comments:

it simply is an unknown. the rationale for the change is understood, as per previous comments if this however becomes unweidly, time consuming or delaying of decisions it will not be the right move. However increasing transparency, improving ability to be engaged and clarity of access to decision making and consultaiton is welcomed.

40 We are interested in your views on the additional costs in terms of time and resources that the proposed process will create for all parties. We are particularly interested in estimates of the monetary costs and benefits to sponsors of previous airspace changes and how these would have been affected by the CAA's proposed new process.

Please enter your comments below.:

no comments .