

██████████
Manager Airspace Regulation
CAA – Aviation House
Gatwick
West Sussex
RH6 0YR

7th August 2019



Dear ██████████,

Thank you for your letter dated 29th July 2019, regarding a new design principle for our FASI-South Airspace Change Proposal (ACP-2018-70).

As you have stated in this letter, in the CAP 1616 process paragraph 109 states that Design Principles must be “drawn up through discussion between the change sponsor and affected stakeholders at this early stage in the process” (with examples as to which local stakeholders may be relevant). This work has already been conducted by LLAOL and has already passed through a gateway, with the CAA approving this work.

Furthermore, in the CAP 1616 process in paragraph 61 it states that ‘A sign-off provides the CAA’s approval that relevant process requirements and guidance have been followed up to that point, and gives the change sponsor the CAA’s approval to move onto the next stage’. As part of Stage 1B, LLAOL had lengthy discussions and engagement with our stakeholders regarding design principles and to return back to this document and inform stakeholders that a new design principle must be added with a higher importance than their design principles, is unacceptable. The CAP 1616 gateways are to provide assurance to stakeholders, change sponsors and the CAA that the work has been conducted effectively. This goes against the principle of a gateway, as this work has already been approved.

Additionally, the context of the requested design principle, raises questions. The CAA have asked the design principle to comply with the AMS and the masterplan. The masterplan has not been published and therefore these discussions are going to be difficult as it is not clear what the masterplan will contain or how this will affect the airport or stakeholders. This masterplan is likely to favour other airports, such as Heathrow, within our airspace proposal. As this design principle is intended to have a high importance, LLAOL through Stage 2B, could have a design which creates more noise, additional track miles and more CO2 emissions in order to comply with the masterplan. This is not something LLAOL can support.

As you have said in your letter, whether LLAOL have satisfactorily completed this will be decided at Gateway 2. However, we believe this should be decided before Gateway 2, as the change sponsors work within Stage 2 is based on approved design principles. If the design principle added is incorrect, this could cause unnecessary delay and risk to the ACP timelines.

If LLAOL does not choose to do adopt this design principle it seems as though we cannot proceed through the CAP 1616 process. As the CAA have said many times before, the CAA are regulators and not change sponsors. It is the change sponsors role to submit design principles, not the CAA to dictate the design principles to be included. A change sponsor may have no control over their airspace change once this design principle has been added with such high importance.

We strongly believe that this design principle should not be included, and if it must be included this should be communicated to stakeholders by the CAA. The CAA should also communicate to stakeholders why it is necessary to return to a gateway that has already been approved as this sets precedence for this happening again in future and creates mistrust between the change sponsor and local stakeholders. Alternatively, the masterplan should be published before change sponsors are

asked to add this design principle, therefore local stakeholders and change sponsors fully understand how this relates to an airspace change.

If you would like to discuss this further, please do not hesitate to contact me.

Yours sincerely



Operations Director