

ROUTE 4 DEVELOP AND ASSESS GATEWAY DE-BRIEF MEETING 03 MARCH 2020

Those present:

LGW	CAA
ANSL	CAA
ANSL	CAA
ANSL	CAA
Osprey	CAA
Osprey	CAA
Osprey	

NOTES

Objective of the meeting was for the CAA to provide further explanation of the decision not to allow Gatwick to progress to the next stage of the Route 4 2018 ACP and provide guidance on the next steps required by LGW. The CAA Stage 2 Gateway meeting was held on 28th February 2020.

CAA advised that these formal notes will be published on the CAA Portal as a record of the meeting.

Referring to the statement from the CAA published via the ACP Portal which identified three points; each were taken in turn:

1. The change sponsor did not demonstrate to the CAA's satisfaction that a consistent approach was adopted in relation to stakeholder engagement.

The CAA made two points:

- 1) greater detail should be provided to evidence a consistent approach given to options in relation to feedback forms, and
- 2) greater detail should be provided to evidence a consistent approach to requests for additional information by stakeholders.

CAA gave an example of a specific stakeholder who had given feedback that because there was not an Option 0 separate feedback form, they felt that GAL had already dismissed this as an option. Some other stakeholders provided the same feedback.

LGW asked if there was an expectation that the change sponsor should reply bilaterally (or individually) to stakeholders following questions raised through feedback, thereby potentially going into more detail than would normally be expected at this stage of the process? LGW added that an explanation as to when data, such as noise impacts and population numbers within specific areas, would be provided was shared during the 2nd focus group held in November 2019.

CAA felt that there was a narrative missing as to how stakeholders had been informed, and they felt that the documentation submitted for steps 2a and 2b should have better described or told the 'story' around how stakeholders were engaged. This element should be clear in the documentation for those stakeholders who were not able to attend the meetings or for those reading the documentation for the first time.

LGW were disappointed that given the nature of this feedback that perhaps the CAA could have let the change sponsor know prior to the Gateway about red flags they were identifying in order to allow the change sponsor to add to the narrative where the CAA felt there could be a more complete explanation of the engagement process, especially as the provision of information in itself was not the issue but solely the reflection of this in the documentation.

The CAA stated that they can issue a 'minded to' decision at the Gateway assessment if they feel it is appropriate that the change sponsor could make administrative changes which should normally be turned around with 24/48 hours. However, on this occasion it was not felt appropriate given the other points identified at this stage.

LGW asked what is the process for the change sponsor to update documentation for the Portal?

CAA stated that the change sponsor could re-apply for the next available Gateway and prior to this, upload a second version of the document(s).

LGW asked where should the further narrative and story-telling fit in within the step 2a and 2b documents, when the documents themselves are a standard format used by other change sponsors who have passed this Gateway.

CAA stated that the additional narrative concerning stakeholder engagement should be within the DPE document as opposed to a separate document.

2. *In considering the comprehensive list of options and the baseline, the sponsor has failed to adequately produce a 'do nothing' option.*

The CAA explained: the current set of Route 4 RNAV SIDs are temporary and will not be in place following the outcome of the Route 4 Post Implementation Review (PIR) which was in the process of being finalised, therefore the change sponsor had confused the options by having Option 0 as the Baseline/do nothing and Preferred option. If this is a temporary set of SIDs, how can they be an option? The CAA's view was that a narrative explaining why these could be used as a do nothing option was imperative, and felt the story-telling again was lacking.

The CAA's economist explained that the options appraisal data provided was satisfactory, but the issue concerned naming the 'do nothing' option as the 'baseline' option because this is based on a set of temporary SIDs. The presentation of the options in this way meant that it did not allow for the provision of any comparisons, as the options were the same. It has also not been stated within the document whether there is or isn't an economic benefit.

LGW stated that not using the current temporary RNAV routes as the 'do nothing' option would pre-suppose that there would be a change in the distribution of traffic flying the Route 4 SIDs. People who have lived under the flight paths with this current distribution of traffic for over 4 years may find it difficult to rationalise or understand an alternative do nothing option which has not been defined.

CAA stated that nevertheless, the Route 4 RNAV SIDs although implemented in May 2016 were still temporary and, in the view of the CAA, this reflected a fundamental weakness in the narrative (or story-telling) through the document.

LGW asked if the current distribution of Route 4 traffic could not, nor ever have been, the 'do nothing' option how would it be possible to define the 'do nothing' option? Should a 'do nothing' option always have been based upon the pre-2012 traffic distribution? If so, how would it be possible for this be quantified?

CAA stated the fundamental problem is a conflation of the 'baseline' and 'do nothing' options. The 'baseline' is what is happening now and the do nothing is what would occur if no further action was taken.

LGW stated that if that is the case then there would need to be a period of time after removal of the temporary RNAVs in order to gather actual track distribution data in order to assess and create the 'do nothing' option. LGW asked what period of time the CAA thought would be reasonable in order to gather track data and to make the environmental assessment of the 'do nothing' option.

CAA replied that the traffic distribution today is not a 'do nothing', as this ACP process could take 3 years or more to complete. The CAA was keen not to over-complicate things. The assessments should be conducted by comparing the traffic of today (baseline) as well as what might change in the future (do nothing). The CAA informed the meeting that they had that morning received a pre-notification of Judicial Review on draft Route 4 PIR decision (CAP1872) which may introduce some delay, however this was not a reason to not to do anything. Their position is the 'do nothing' option as described is not acceptable.

LGW stated that there are really only 2 options to take this work on the baseline forward: 1) await a period of time in order to gather data and tracks following the implementation of the PIR decision; or, 2) somehow model the nominal conventional track environmental and optional analysis assessments.

LGW stated that at this stage no-one can, with any degree of accuracy, describe where the aircraft tracks will be over the ground when the RNAVs are removed (given the use of RNAV-coded overlays by the airlines) and they felt that a period of time would be needed to establish where the actual tracks will be flown.

LGW felt there is a substantial risk involved with modelling which could lead to further legal challenge. LGW asked the CAA if there was a CAA lawyer present in the Gateway Assessment meeting, CAA replied there was not. LGW asked the CAA if modelling the aircraft tracks as a potential solution was discussed in the meeting and if the CAA had considered how this could be resolved? CAA confirmed that there was no conversation about modelling and it is for GAL to develop and present a solution.

A conversation followed about the replication of the conventional route within aircraft systems and it was noted that a Civil Aviation Publication (CAP) is due to be published, setting out the CAA's policy on RNAV Substitution.

It was suggested that perhaps coding tables could be added to the AIP by LGW in order to replicate the route, therefore providing some degree of certainty of aircraft track. CAA have been working with NERL and Heathrow on guidance for temporary RNAV substitution of conventionally designed procedures.

It was noted that if coding tables are used in the AIP long-term, it could present a challenge with 5 yearly IFP reviews.

3. *The Change Sponsor has failed to produce to the CAA's satisfaction, a design principle evaluation showing how its design options have responded to the design principles.*

The CAA stated: 1) Greater detail should be provided when dismissing options, particularly when this is for safety reasons. This includes the comprehensive list of design options which were presented to stakeholders as already 'unsupported' in the first stakeholder engagement.

The CAA wished to see more narrative within the document to better articulate why options A-E had been discounted, as well as a more detailed narrative as to how the 8 options were narrowed to 3. They wished to see a strong argument why some options were discounted on reasons of safety.

LGW stated that the requirement within CAP1616 is for a high-level assessment of safety and agreed that there should be further narrative why options A-E were discounted and unsupported.

2) Detailed explanation should be provided as to why one option is preferred over other options when considering the comprehensive list of options against the agreed design principles.

3) Greater detail with the relevant supporting rationale should be provided on how decisions were made on options taken forward in relation to stakeholder feedback.

CAA would like to see more narrative around how the options list was narrowed from 8 to 3 options and further description and narrative as to why option 0 is the preferred option rather than option 7, which in the CAA's view seemed better suited to the design principles as presented. CAA stated that it was confusing within the narrative in the Initial Options Appraisal document that both option 0 and 7 appeared to both be the shortest route?

Meeting Close

- CAA asked the change sponsor when considering next steps to be appreciative of the significant demand for Gateways through the year.
- LGW felt next steps would need to be considered carefully but stated that this is unlikely to be completed quickly because of the new considerations in defining 'do nothing', 'do minimum' and 'baseline' options.
- LGW stated that amendments to the documentation can be completed relatively easily in order to provide a better narrative around the areas discussed, however, the redefinition of 'do nothing' will take much longer to allow the gathering of a new data set over a period of time once the RNAV SIDs have been removed.

The meeting concluded and all parties thanked each other for their time.