

CAA Targeted Engagement Assessment – Temporary Airspace Changes

Title of airspace change proposal	Gatwick Airport Reduced Night Noise Trial
Change sponsor	Gatwick Airport
Project reference	ACP 2018 062
Case study commencement date	2 October 2023
Case study report as at	5 October 2023
<p><i>Instructions</i></p> <p>In providing a response for each question, please ensure that the 'status' column is completed using the following options:</p> <ul style="list-style-type: none"> • YES • NO • PARTIALLY • N/A <p>To aid the SARG Lead it may be useful that each question is also highlighted accordingly to illustrate what is:</p> <p>resolved YES not resolved PARTIALLY not compliant NO</p>	

Targeted Engagement Assessment		
1	Has the change sponsor identified the right audience(s) and provided a rationale for selecting them?	YES
	<p><i>(Has the change sponsor liaised with CAA Flight Ops on stakeholder identification?)</i></p> <p>Before a trial commences, a sponsor must demonstrate it carried out engagement with aviation stakeholders (airspace users, ANSPs and airports)- Para 317. The sponsor has demonstrated this consistently over the time of this ACP. Specifically, they engaged with a series of relevant aviation stakeholders between 2018-2022 over a series of workshops and industry presentations; followed by a survey.</p> <p>Specifically, they engaged with:-</p> <p>Gatwick NMB (Chairman) ANS Services ? Virgin Atlantic Norwegian Airlines CAA</p>	

	NATS, DfT Trax International Gatwick Airport limited BALPA Easyjet Helios (as a stakeholder?) TUI Mitchell Environmental ERCD (CAAi)	
2	Has the change sponsor explained the engagement methodology / approach used?	YES
	<p><i>(Has the change sponsor shared their strategy/approach with the CAA for comment in advance of conducting their engagement (or consultation) activity?)</i></p> <p>CAP 1616 states that (for a trial) the sponsor must “establish that the trial will be safe and operationally viable” (para 317), via engagement with aviation stakeholders. To this end, the engagement activity supports this requirement.</p> <p>In the Document entitled “Reduced Night Noise Trial Submission Pack” dated September 2023 (V2.1), the sponsor outlines what engagement has taken place to date. They effectively discuss three rounds of engagement mostly via meetings:</p> <ul style="list-style-type: none"> • NMB Meetings (NMB 6-NMB/14)- Between June 2017-May 2019 to discuss aspects of the trial as it was initiated and evolved; • Industry Workshops and Presentations- Between July 2017- May 2022- Looking at the safety and operational viability of the trial; and • A survey (May-June 2019) with the FLOPSC to capture airline operational and procedural requirements to support the planning and development of the trial PBN routes. <p><i>(Has the change sponsor undertaken multiple rounds of engagement?)</i></p>	
3	What materials have been used by the change sponsor during the targeted engagement?	YES
	<p><i>(Has the change sponsor shared their materials with the CAA for comment in advance of conducting their engagement (or consultation) activity?)</i></p>	

	<p><i>(Has the material clearly articulated what is being proposed and the impacts of the proposal?)</i></p> <p>The sponsor has provided a Consultation Document and corresponding form (Annex G and H respectively). The Consultation Document covers: Trial objectives and principles; parameters; operations and proposed routes. For information the sponsor also provides survey results from Gatwick airlines about PBN procedures, minutes from a trial workshop in May (2022) are also provided (which discusses trial information/considerations).</p> <p>The survey asked for contact details, followed by the following questions:</p> <ul style="list-style-type: none"> • Is the Gatwick Airport RNN Safe (yes or no), if not, please give details. • Is the Gatwick Airport RNN Operationally Viable? (yes or no), if not, please give details. • Do you have any additional comments? 	
4	Does the Engagement Summary Report clearly detail the period of engagement? Please include the start/end date and duration of engagement period along with a summary of the change sponsors rationale for pursuing a shorter/longer engagement (where applicable).	YES
	Please see below, the 'formal consultation period' was for four weeks between 29 May 2019 – 28 June 2019. The rationale for a four week period is also set out below.	
5	Was the period of engagement appropriate?	YES
	<p>The sponsor has provided ample timescale for aviation stakeholders. Under the guidance for Airspace Trials (as presented in Part 1b in the CAP 1616 process), there is no direct guidance on the timescale for engagement before the trial begins.</p> <p>Under "Section 2: Industry Consultation", the sponsor sets out their timescale on the engagement before the trial begins. They discuss a 'consultation period' of 4 weeks between 29 May 2019, for four weeks until 28 June 2019. They go on to say that consultation with NATMAC started a week later, but also lasted 4 weeks. It is not clear of whether the dates above are inclusive of the timescale that NATMAC had to respond.</p> <p>Besides this 'formal consultation period', as mentioned above the sponsor engaged extensively with aviation stakeholders on the operational and safety viability of the proposed trial via meetings/presentations between 2017- 2022.</p> <p>Condition: For transparency, the sponsor needs to be clearer about how the consultation period for NATMAC (para 70).</p> <p>Recommendation: The sponsor should avoid the use of the phrase 'formal consultation' here. There is no formal requirement for the sponsor to consult in the trials process unless directed to do so by the CAA.</p>	



6	<div data-bbox="353 308 1771 403">Has the change sponsor accurately summarised what stakeholders have said and identified all the issues raised during the engagement in the stakeholder engagement summary document? Does the stakeholder engagement summary document detail the change sponsor's response to the identified issues?</div> <div data-bbox="1771 308 2013 403">YES</div>
	<p data-bbox="353 419 2002 523">Yes the sponsor has accurately summarised what stakeholders have said in the annexes of the report. The sponsor has provided feedback from all briefings and workshops and given raw data of feedback from stakeholders from the consultation survey. As the sponsor has identified their official 'consultation period' being that of the survey period (29 May 2019- 28 June 2019), this is what is presented below.</p> <p data-bbox="353 576 636 603"><u>Consultation Feedback</u></p> <p data-bbox="353 647 853 675">Q: Is the Gatwick RNN safe? (Yes: 6, No:0)</p> <p data-bbox="353 727 1939 786">NATS: From an ATC perspective, no non-tolerable risks are introduced by this trial. Once all trials/management criteria are confirmed within our formal Safety Assessment, we will confirm this view.</p> <p data-bbox="353 804 1010 831">MoD: No comment- continued engagement welcomed</p> <p data-bbox="353 849 1906 908">NATMAC Representative: As reflected in airline comments, we believe this trial to be safety, so long as flight deck workload is not increased (if crews have to routinely update FMS parameters during approach).</p> <p data-bbox="353 925 577 952"><i>Sponsor response:</i></p> <ul data-bbox="353 963 1984 1150" style="list-style-type: none"> • A formal Safety Assessment is planned for later on in the year, once routes have been developed. The assessment will be included in the submission to the CAA. • The sponsor will continue to engage with stakeholders. • ILS and RNAV procedures will still be used, so there is no departures from current procedures. PBN will be coded in the FMS as usual. FMS will not be required to be routinely updated. <p data-bbox="353 1206 1106 1233">Q: Is the Gatwick RNN Trial Operationally Viable? (Yes: 6, No:0)</p> <p data-bbox="353 1278 2013 1337">NATS: Engagement over the last 12 months has produced agreeable time bandings, with acceptable levels of traffic. NATS reserve the right to suspend the trial for operational and safety reasons.</p> <p data-bbox="353 1355 1016 1382">MoD: No comment- continued engagement welcomed.</p> <p data-bbox="353 1399 1597 1426">NATMAC Representative: We believe (as reflected in airline comments) this will be operationally viable.</p>

	<p><i>Sponsor response:</i></p> <ul style="list-style-type: none"> • Suspension procedures for the trial will be developed with NATS. Will be provided in the Submission Pack. • We will continue to engage with all stakeholders <p>Any other comments?</p> <p>Airline 1:</p> <p>The simulator will need to validate the trial so that the new Airbus procedures requiring the Approach mode will be armed only after passing ARPIT- though this should not be a problem.</p> <p>A better approach maybe making IBGAT/YOTAG/TAGOF/TAGCO/ PETAG/GATZA the FAF, coded as a 3-degree approach path from this point onwards with the level segment inserted just prior to these points.</p> <p>Even better, start the approach from FL70 with the level segment at this height so that the segment was flown less impactfully to those on the ground.</p> <p><i>Sponsor response:</i></p> <ul style="list-style-type: none"> • Trial routes will be validated in simulation using Airbus/Boeing Aircraft Types • Final Approach Procedures will not change, this is out of scope. • FL70 is not available in low pressure conditions (hence procedure starting at 6,000ft). The first waypoint will be defined as not below 6,000ft all allow aircraft to stay higher and descent gradually; enabling the best profile into the procedure. <p>Airline 2:</p> <p>We need a lead in to ensure our Navigation Database suppliers to code the approach.</p> <p><i>Sponsor response:</i></p> <p>Feedback noted and reflected in the timeline.</p> <p>Airline 3:</p> <p>Procedures should use the ability to fly a radius to fix and avoid vectors from end of RNAV STAR to final approach.</p> <p>Final Approach fixes should be a 2,000' on non-ILS NPA approaches to avoid having to slow down too early in accordance with Boeing flight crew training.</p> <p><i>Sponsor response:</i></p> <p>Trial routes are based on RNP1 with RF legs. There is no vectoring between transition and the final approach of aircraft in the trial.</p> <p>Final Approach procedures will not be changing- this is out of scope. Transitions will be coded so that no slow down is required; this will be</p>
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	<p>checked in simulators.</p> <p>Airline 4: In certain environmental conditions (e.g. significant tailwind), the vertical profile will be difficult. Such conditions will need direct management (with the use of speed brake). This will not lead to a low drag/noise approach.</p> <p>Sponsor response: Tailwind conditions will be used in simulator test.</p> <p>ANSP: NATS welcomes positive engagement re: designing, assessment and planning of the trial and wish for it to continue.</p> <p>Sponsor response: Feedback noted, engagement will continue.</p> <p>Aviation representative- NATMAC 1: Flight Data Monitoring data should be supplied to confirm whether having a late centre line intercept leads to unstable approaches.</p> <p>Sponsor response: All intercepts are at 10NM min (complying with Gatwick Airport night time operating procedures in the AIP). A late centre-line intercept should not occur within the PBN transition that joins the centreline in compliance with this. Operators will be asked to complete a questionnaire in case there are other lessons to be learnt.</p> <p>Aviation representative- NATMAC 2: Support the use of steeper approaches and have recommended this to the Airports Commission. Such approaches assume that they can be designed so the configuration/power settings required do not generate additional noise at lower altitudes.</p> <p>Sponsor response: Transitions are not steeper than those used today. However, incidences of aircraft flying unnecessarily low should be removed. The simulator will confirm the suitability of the descent angle.</p>	
7	Is the change sponsor's response to the issues raised appropriate/adequate?	YES
	<p>Yes, see above for the sponsor's responses. The sponsor has responded adequately by:</p> <ul style="list-style-type: none"> • Encouraging further engagement • Taking on board feedback (such as factoring in airline planning lead times) 	

	<ul style="list-style-type: none"> Explaining/reassuring stakeholders on was out of scope/ in scope of the ACP (ie on the feedback the Final Approach procedures) Explaining considerations in simulations (aircraft type; descent angles etc) 	
8	Has the change sponsor set out how they will collate, monitor, and report to the CAA on the level and content of the complaints?	YES
	<p>The sponsor has set out how they will deal with complaints during the trial. Para 319 states that sponsors should “<i>collate, monitor and report to the CAA on the level and content of any complaints</i>”. Under the section “Monitoring Trial Progress” in the submission the sponsor states that they will produce a monthly report during the trial which details “noise complaints, including a the number and locations of complaints”. Further, the sponsor has comprehensively outlined a “Noise Complaints and Enquiries Procedure” in Annex O. In it, the sponsor gives links to an online tracker and an online complaint form. The document is clear that people can complain in writing to an address or via the App.</p>	
9	Is the proposal likely to affect traffic operating below 7000ft over an inhabited area? If yes, has the change sponsor provided the brief impact analysis to explain the likely impacts and explained how they will inform relevant community stakeholders?	PARTIALLY
	<p>Yes, the proposal will affect traffic operations below 7000ft. The sponsor has advised how they will engage with stakeholders as the trial progresses under “Future Engagement” in their submission document. They say they will include a much wider audience for engagement nearer the trial start date and will continue this engagement during and after the trial. They will engage using the following umbrella forums: NMB, NaTMAG, Airlines via FLOPSC and the Airline Operators Committee (AOC) and GATCOM. These groups have wide ranging membership from aviation and non aviation backgrounds. However, membership is not always transparent. When asked about constituent members of each of these forums, the sponsor did not fully elaborate (see email dated 4 October 2023) on membership on all forums. For GATCOM for example councils are simply banded together as ‘local authorities’ without naming members.</p> <p>Para 318 of the CAP 1616 processes discusses engagement with the full range of stakeholders before the trial commences. Para 319 discusses engagement requirements during the trial. Before the trial, it states that the level of information about the trial should be influenced by the noise assessment. Currently, under ‘Future Engagement’ the sponsor simply states that ‘presentations and information papers’ will be provided (without any references to noise assessments).</p> <p>Recommendation</p> <p>Having looked at Annex L (which provide the proposed 60 dBA Lmax contours for the trials) and having discussed with the environmental regulator, it is advised that the sponsor should consider informing all those under proposed contours at ≥60 dBA Lmax. It is also recommended that the sponsor engages with them during the trial (para 218).</p>	

	Recommendation The sponsor may wish to consider broadening out the stakeholders for informing/engagement to a more granular level of community (ie parish/community/residents groups) and also consider contacting local MPs, councillors for those areas under the proposed trial paths at ≥ 60 dBA Lmax.	
10	Taking the above considerations into account, does the SME recommend that this proposal has met the engagement requirements of the TRIALS airspace change process?	PARTIALLY
	The SME recommends this proposal has met the requirements for the trials airspace change process with regards to para 316's requirements for engagement with aviation stakeholders. Even though the sponsor has given some insight as to how they would inform the full range of stakeholders, it is not informed by the noise assessment and does not sufficiently detail what reasonable steps the sponsor will take to inform communities and their representatives before any trial commences.	
11	Are there any Condition(s) which the change sponsor must fulfil before activation (if approved)? If yes, please list them.	YES
	<ul style="list-style-type: none"> For transparency, the sponsor needs to be clearer about how the consultation period for NATMAC (para 70). Any TOIs/LOAs mentioned in the final submission between the sponsor and certain airspace users are produced. Evidence can be provided that these documents are in draft. The sponsor is required to collate, monitor, and report to the CAA on the level and contents of complaints received during the period of the trial. The CAA would welcome confirmation on the level and contents of any stakeholder complaints received on a two-weekly basis throughout the duration of the trial). The change sponsor should inform the stakeholders of the decision (when published), likely impacts and what will happen next. The following is also recommended: It is advised that the sponsor should consider informing all those under proposed contours at ≥ 60 dBA Lmax. It is also recommended that the sponsor engages with them during the trial (para 318). Recommendation: The sponsor should avoid the use of the phrase 'formal consultation'. There is no formal requirement for the sponsor to consult in the trials process unless directed to do so by the CAA. 	

Targeted Engagement Assessment sign-off			
	Name	Signature	Date
Assessment completed by Airspace Regulator (Engagement and Consultation)			5 October 2023