

# PIR Data Report Clarification Questions for ACP2018-65 SAIP AD6.

## Issue 1.0 (25<sup>th</sup> March 2025)



This document contains Post-Implementation Review (PIR) clarification questions from the CAA, along with responses from NATS and LLA, the joint sponsors of this ACP.

Ref	Submission Document Name, Page/Para	Question/Issue	Date	Response
CAA01	PIR Main Document Para 4.2.6	Please provide the CAA with the details of the relevant 14 MORs.	Jan 25	CAA are satisfied that through ATS Inspector oversight, that the actions taken by NATS were in accordance with regulation.
CAA02	PIR Main Document Section 4.5.3 and 4.5	What was the remedial action taken as a result of the LoS?	Oct 24	CAA are satisfied that through ATS Inspector oversight, that the actions taken by NATS were in accordance with regulation.
CAA03	PIR Main Document Section 4	What is the difference between wind and weather (4.2.10) when considering excursions?	Jan 25	<p>Paragraph 4.2.7 of the main PIR document states that three events occurred on a “yellow strong wind warning” day, Wednesday 5<sup>th</sup> October 2023 and one occurred on Sunday 13<sup>th</sup> November 2023 during the named Storm Debi.</p> <p>Having reviewed the narrative of these six reports, in five cases weather and wind were relevant contributory factors, three of which occurred on the same strong-wind day and one occurred during Storm Debi as noted above. Therefore in these cases “weather” and “wind” should be considered interchangeable.</p> <p>In the sixth report, incident ID 173307, an aircraft remaining on a heading for weather avoidance was a relevant contributory factor – this is not an unusual type of event, and sometimes occurs when pilots make a request to avoid high level storm clouds.</p> <p>We are happy to clarify. However, this does not materially affect the safety data, summary and conclusions drawn in the original document.</p>
CAA04	PIR Main Document Section 4	What was actually considered, by senior management, re the six excursions that were not considered to be as a result of weather/wind?	Jan 25	Informing senior management, following completion of the internal investigation, was the final stage in the closure of these events; this is consistent with standard NATS safety process.
CAA05	PIR Main Document Section 16.3.5	Please provide the CAA ATS Inspector with details of how the poll was carried out in order for the CAA to confirm the assertion stated.	Jan 25	CAA are satisfied that through ATS Inspector oversight, that this assertion will be checked and verified.

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CAA06	PIR Annex A: Traffic Dispersion & Environmental Data 2.1.13 Table 1	%difference in Table 1 – please confirm where the differences are rounded up or down.	Jan 25	<p>The number of aircraft in each category is stated as an integer, with the percentages presented to illustrate the proportions for each period. In all cases, standard rounding has occurred after the raw data has been calculated. For the “% difference” column, each number was rounded to the nearest 0.1% as follows, using raw data calculations to three decimal places:</p> <table border="1" data-bbox="1294 368 1653 651"> <thead> <tr> <th data-bbox="1294 368 1451 400">% difference</th> <th data-bbox="1451 368 1653 400">3 decimals</th> <th data-bbox="1451 368 1653 400"></th> </tr> </thead> <tbody> <tr> <td data-bbox="1294 400 1451 448">2.2%</td> <td data-bbox="1451 400 1653 448">2.169%</td> <td data-bbox="1451 400 1653 448">up</td> </tr> <tr> <td data-bbox="1294 448 1451 496">0.1%</td> <td data-bbox="1451 448 1653 496">0.076%</td> <td data-bbox="1451 448 1653 496">up</td> </tr> <tr> <td data-bbox="1294 496 1451 528">-0.1%</td> <td data-bbox="1451 496 1653 528">-0.059%</td> <td data-bbox="1451 496 1653 528">down</td> </tr> <tr> <td data-bbox="1294 528 1451 560">-1.5%</td> <td data-bbox="1451 528 1653 560">-1.497%</td> <td data-bbox="1451 528 1653 560">down</td> </tr> <tr> <td data-bbox="1294 560 1451 592">-0.6%</td> <td data-bbox="1451 560 1653 592">-0.633%</td> <td data-bbox="1451 560 1653 592">up</td> </tr> <tr> <td data-bbox="1294 592 1451 624">-0.1%</td> <td data-bbox="1451 592 1653 624">-0.060%</td> <td data-bbox="1451 592 1653 624">down</td> </tr> <tr> <td data-bbox="1294 624 1451 651">0.0%</td> <td data-bbox="1451 624 1653 651">-0.003%</td> <td data-bbox="1451 624 1653 651">negligible</td> </tr> </tbody> </table> <div data-bbox="1686 368 2123 651" style="border: 1px solid black; padding: 5px;"> <p><u>Note regarding rounding negative numbers</u></p> <p>When a <b>negative</b> number is rounded <b>down</b>, the number <b>increases</b> in size to get further away from zero.</p> <p>When a <b>negative</b> number is rounded <b>up</b>, the number <b>decreases</b> in size to get closer to zero.</p> </div>	% difference	3 decimals		2.2%	2.169%	up	0.1%	0.076%	up	-0.1%	-0.059%	down	-1.5%	-1.497%	down	-0.6%	-0.633%	up	-0.1%	-0.060%	down	0.0%	-0.003%	negligible
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CAA07	PIR Annex A: Traffic Dispersion & Environmental Data	Please provide the CAA with dispersion pictures (Figs 4-20) that allow the CAA to view the images without direction arrows. This will allow the CAA to view the density plots to provide assurance regarding the review.	Jul 24	<p>This was done 23 Jul 24 via email. CAA are satisfied with the images provided without direction arrows.</p> <p>Note: The supplemental Annex A1 has direction arrows that are “faint” but still visible (see below).</p>																								
CAA08	PIR Annex A paras (2.1.4) that reference how traffic behaved post change (ie para 3.5.9, 4.3.18) all Figs showing post-airspace change PIR Annex A: Traffic Dispersion & Environmental Data	The 7 days’ worth of data been provided does align with the 7 days used to illustrate the likely dispersion for the consultation. However, this does not allow for a fair determination of the dispersion or levels of traffic since the change was implemented. There is a requirement to show how the change has actually performed (para 4.1.2). The CAA would like to see traffic dispersion and level data for other periods during the PIR data collection period in order to determine if the traffic performed as expected as a result of the change (see CAP1616 (Ed4) para 276). We would suggest that a minimum of 1 week of data from Jan 23, Mar 23 (a month of peak complaints) and Sep 23 are also provided, however a period longer than 1 week may offer more detail	Email Sent to NATS/LLA Dec 24	<p><i>CAP1616ed4 extract from para B24:</i>  <i>“When using data samples to represent periods of operation, sample periods after implementation must be comparable with any sample periods used before the change.”</i></p> <p>The consultation material and the original PIR both used 14 days (7 days illustrating the easterly operation and 7 days west) therefore this requirement has been met by the original PIR in a fair manner consistent with process requirements. However we have agreed to provide two additional sample periods in a supplemental Annex A1 to be published alongside this clarification matrix. We identified a suitable 7-day westerly sample (Mon 13-Sun 19 March 2023) and a suitable 7-day easterly sample (Thur 1-Wed 7 Sept 2023). Combined with the original PIR we now provide a total of 28 days of traffic dispersion data. This is double the original data and double the consultation sample data period. We contend this aligns with the intent of the CAA request, and exceeds CAP1616Ed4 para B24 requirements.</p> <p>The supplemental Annex A1 shows the pre-ACP, original PIR and additional PIR diagrams, however the narrative compares the original PIR diagrams with the supplemental PIR diagrams for consistency – we do not need to duplicate the comparison with the pre-ACP arrangements, which is already within the original PIR’s Annex A Traffic Dispersion document.</p>																								

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CAA09	PIR Annex A: Traffic Dispersion & Environmental Data	Please provide a summary of how the concentration of tracks been calculated. There are areas of 'grey' that appear to overlap, yet this colour is meant to indicate fewer than 2 aircraft a day.	Email sent to NATS/LLA Dec 24	See Annex A1 for additional explanatory text.
CAA10	PIR Annex A: Traffic Dispersion & Environmental Data, para 5.9.1	What is meant by 'vast majority' and 'acceptable tolerances' of the original prediction?	Jan 25	<p><i>CAP1616ed4 extract from para 287:</i>  <i>"The following outcomes could apply to Stage 7.</i>  <i>The CAA may:</i></p> <ul style="list-style-type: none"> <li><i>confirm that the implemented design satisfactorily achieves – within acceptable tolerance limits – the objective and terms of the CAA's approval, and the change is confirmed..."</i></li> </ul> <p>The text in Annex A reflects the wording from this extract, intending to convey the ordinary, subjective meaning of these phrases. We strongly believe we have made our case via the published PIR material, supported by the supplemental Annex A1 dispersion data published alongside this matrix. It is for the CAA to decide if our case is made.</p>
CAA11	PIR Annex A: Noise Technical Report section 4.1 PIR Scenarios and assessment of noise impacts.	At Stage 4 the environmental assessments were presented as 2022-2032 but used 2021 to 2031 operations and forecast data. Please confirm that PIR Assessment Scenarios 3, 4 and 5 are also based on the same period and therefore provide a direct comparison with the Stage 4 assessments.	Email sent to NATS/LLA 06/01/25	<p>In the PIR and for scenarios assuming the implementation year, the assessments are carried out using 2021 operations as per the Stage 3 and Stage 4 assessments.</p> <p>This is stated in the report (see Section 4.1 and again in Section 4.6.) The WebTAG assessments illustrated in Section 5.3.5 are carried out over the same 10 year period used in Stage 3 and Stage 4 which makes the assessment directly compatible.</p>
CAA12	PIR Annex A PIR Annex A: Noise Technical Report section 4.1: PIR Scenarios and assessment of noise impacts.	Please confirm that PIR Assessment Scenarios 3 and 5 and their associated outputs are as reported at Stage 4 Final Options Appraisal.	Email sent to NATS/LLA 06/01/25	<p>Scenarios 3 and 5 are as reported in the Stage 4 Final Option Appraisal.</p> <p>Data for Option1A are reported in Annex D of the Consultation Document under Option 1.</p> <p>Data reported in Annex D of the Consultation Document for Option 1 are consistent with the PIR data.</p> <p>Do-nothing data reported in the PIR report are also consistent with the do-nothing as reported in the Consultation Document under Do-nothing.</p>

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CAA13	PIR Annex A Noise Technical Report section 5.1.1: Overflight	Please provide overflight contours and associated outputs for each PIR Assessment scenario 4, in line with CAP 1616 v4 para B62: <i>'When using the overflight metric sponsors must assess and portray the population numbers affected. Because it does not reflect noise impacts, there is no need to produce an area count or to identify noise-sensitive buildings.'</i> The assessments must use the same methodology as the assessments presents at Stage 4 Final Options Appraisal and Scenarios 3 and 5 must be unchanged from those presented at Stage 4 Final Options Appraisal.	Email sent to NATS/LLA 06/01/25	<p>This item was the subject of significant discussion between us and the CAA. We met the CAA and explained that the data requested was not specified in the CAA's PIR Data Request document (<a href="#">link</a>, published March 2022), therefore the work was never part of the PIR contract with our specialist noise consultants.</p> <p>That contract aligned with every noise-related item published on pages 11-12 of the CAA's PIR Data Request document, which was duly delivered. We published the Noise Technical Report in July 2024, alongside the rest of the AD6 PIR material in a <i>bona fide</i> effort to comply with the CAA's written PIR specifications. We also explained that this request arrived six months after the original publication of the PIR material. We said there are additional unexpected costs combined with the resource availability of the specialist noise consultants who created the report, causing delay to the PIR as a whole.</p> <p>The CAA insisted the work was required to provide context (see also CAA17) and responded that they will consider, in future, asking for such data in similar ACPs much sooner, to try to avoid these unexpected costs.</p> <p>We agreed to re-engage our specialist noise contractors. They have produced the output, which was presented to the CAA and discussed. The output and conclusions are published in the Portal within v2 of the Noise Technical Report.</p>
CAA14	PIR Annex A: Noise Technical Report - Table 25 (p.64)	Table 25 indicates aggregate change of 500 households. Supporting text states difference of 300 households between the two scenarios.	Jan 25	That is a typo in the text of the report. It should read "500" in the supporting text instead of "300". This is corrected in v2 of the Noise Technical Report p.65.
CAA15	PIR Annex A: Noise Technical Report -Table 40 (p.84)	Table headings on Table 40 - <i>WebTAG comparisons for the with DCO Scenarios</i> refer to 2032 <b>No DCO</b> Option 1A for the 3 "with DCO" situations.	Jan 25	That is a typo in the heading of Table 40, it should read "With DCO" as per the caption and associated context. This is corrected in v2 of the Noise Technical Report p.85.

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CAA16	PIR Annex A: Traffic Dispersion & Environmental Data, section 4.4 text & Figures 16 – 21	Reference is made to place names in the supporting text to the figures, but the locations referenced are not visible on the maps. To assist stakeholders can the referenced place names be made clearer on the maps.	Jan 25	<p>The text was copied and pasted from the original consultation document. It was based on Ordnance Survey map backgrounds that had more detail but were somewhat cluttered. The newer (original published PIR and Supplemental Annex A1) maps are easier to read but some of the original placenames are not present. We contend there is sufficient detail in these maps (other towns/villages, roads and intersections) to identify the places referenced in the text copied from the original consultation material.</p> <p>The supplemental Annex A1 only refers to placenames visible on the maps, or will otherwise describe the location in question, and will compare the original PIR with the supplemental diagrams using the same backgrounds and visible placenames. We contend this is sufficient to allow for appropriate study and comparisons.</p>
CAA17	PIR Annex A: Noise Technical Report – Section 5.2 Table 25	Estimated population exposed to LAeq levels, “Option 1A – Final Design in the implementation year” vs “Option 1A – with AD6 airspace configuration as occurred” indicates increase in noise exposure. Why is the impact of AD6 implementation worse than was anticipated in the final design?	Jan 25	<p>Essentially this relates to the original assumptions on dispersion for the vectored arrivals and for the proportions of night traffic flows being vectored vs being shortcut, then compared with actual usage, combined into models that need to be otherwise like-for-like. Our specialist noise consultants explained that, while there is a difference, the actual change in impact is marginal.</p> <p>This was presented to the CAA who understood the situation. Additional output, explanations and conclusions are published in the Portal within v2 of the Noise Technical Report (new section 6 with overflight contour details, new section 7 explaining where and why there are technical differences in contours, with an updated conclusion section 8).</p>

List of additional PIR documents published on the portal:

AD6-PIR CAA Clarification Questions and Sponsor Responses (this document)  
AD6-PIR Annex A1 Issue 1.0 Supplemental Traffic Dispersion Data  
AD6-PIR Issue 2.0 Noise Technical Report

End of CAA Clarification Questions and Sponsor Responses document