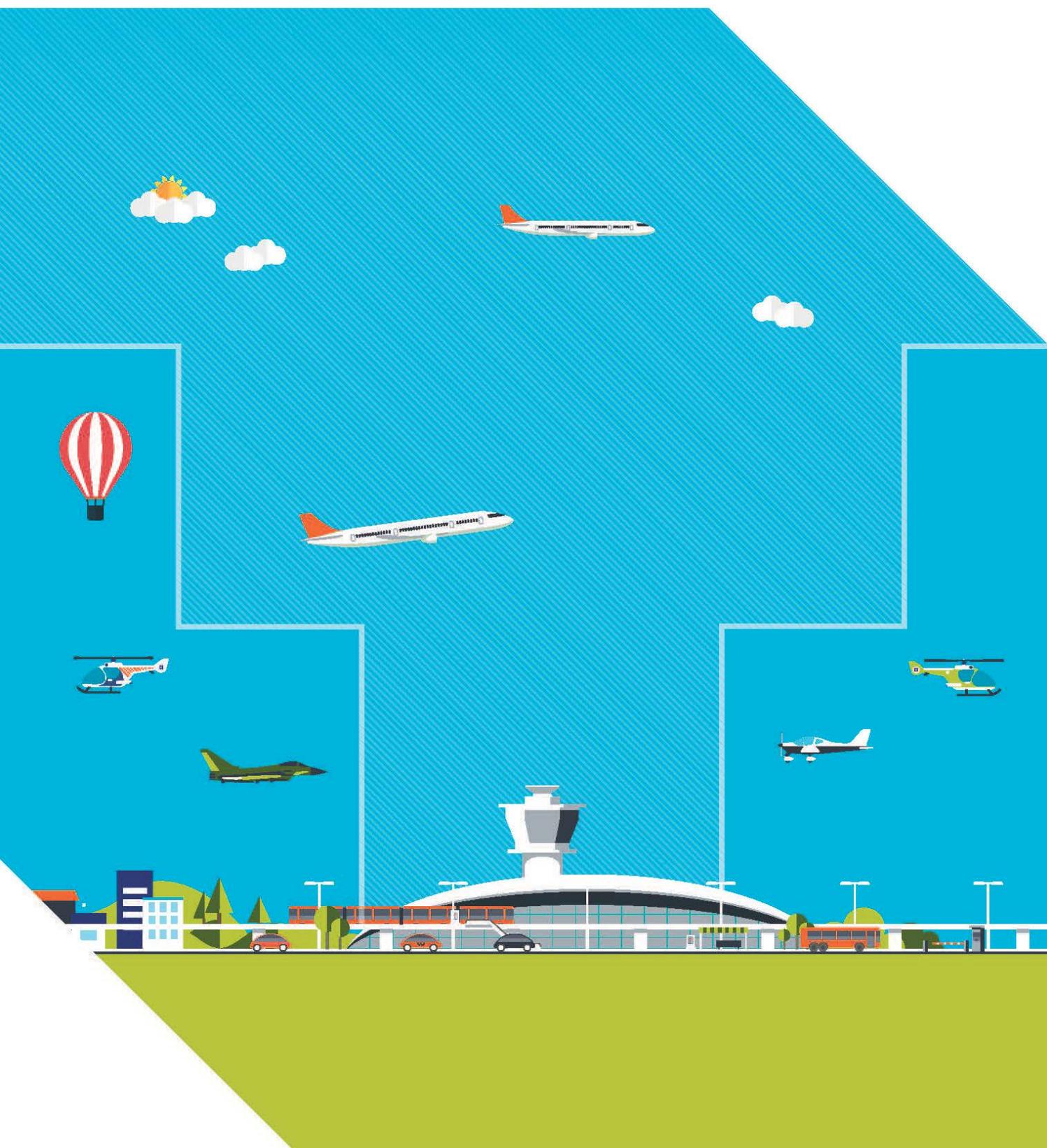


# Outcome of CAA stakeholder engagement on our draft Airspace Modernisation Strategy

CAP 1710



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## Chapter 1

# Stakeholder engagement

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## Introduction

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- 1.1 The Government has tasked the CAA with preparing and maintaining a co-ordinated strategy and plan for the use of UK airspace for air navigation up to 2040, including for the modernisation of the use of such airspace.
- 1.2 Between 19 July and 10 September 2018 the CAA carried out a stakeholder engagement exercise to understand views on our new draft Airspace Modernisation Strategy responding to this requirement.
- 1.3 The draft Airspace Modernisation Strategy (CAP 1690), was published as part of the stakeholder engagement exercise.<sup>1</sup>
- 1.4 We invited interested stakeholders to offer feedback on the draft document – including its approach and the initiatives it sets out as the primary ways to deliver modernisation – before it was finalised and delivered to the Secretary of State in December 2018.

## Who responded to the engagement exercise?

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- 1.5 We had 263 responses in total, after removing duplicate official responses from the same organisation.
- 1.6 We asked respondents to self-categorise<sup>2</sup> in one of eight categories. Of the 263 responses:
  - the most responses were from residents affected by aviation (152), a number of whom were affiliated with a group who all submitted identical or very similar responses
  - 31 responses were from the commercial aviation industry, including four that were organisations relating to drones
  - 31 responses were from the General Aviation community
  - 28 responses were from representative or national organisations or institutes, some of which were local representative groups and one of which was a nationally owned airport
  - 13 responses were from government and/or other regulators, all except one being from county, borough or local councils
  - five responses were from elected political representatives, some of which were local authorities rather than individual politicians

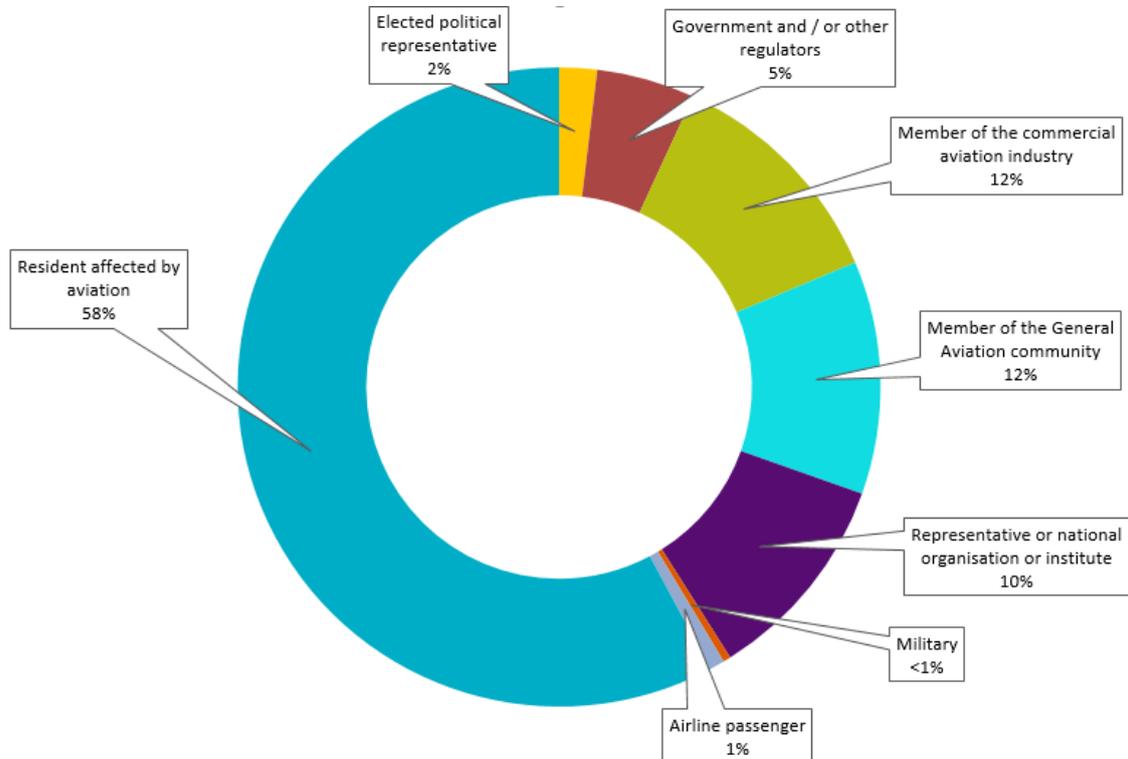
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<sup>1</sup> See <https://consultations.caa.co.uk/policy-development/draft-airspace-modernisation-strategy/> where the draft Airspace Modernisation Strategy document and responses can be viewed. In the interests of transparency, we have published all responses unless the respondent specifically asked us not to.

<sup>2</sup> We respected their self-categorisation and did not recategorise these responses.

- one response received was from the Military
- two respondents categorised themselves as passengers, one of whom noted they were also a resident affected by aviation.

**Figure 1.1: Responses by category (% of total responses)**

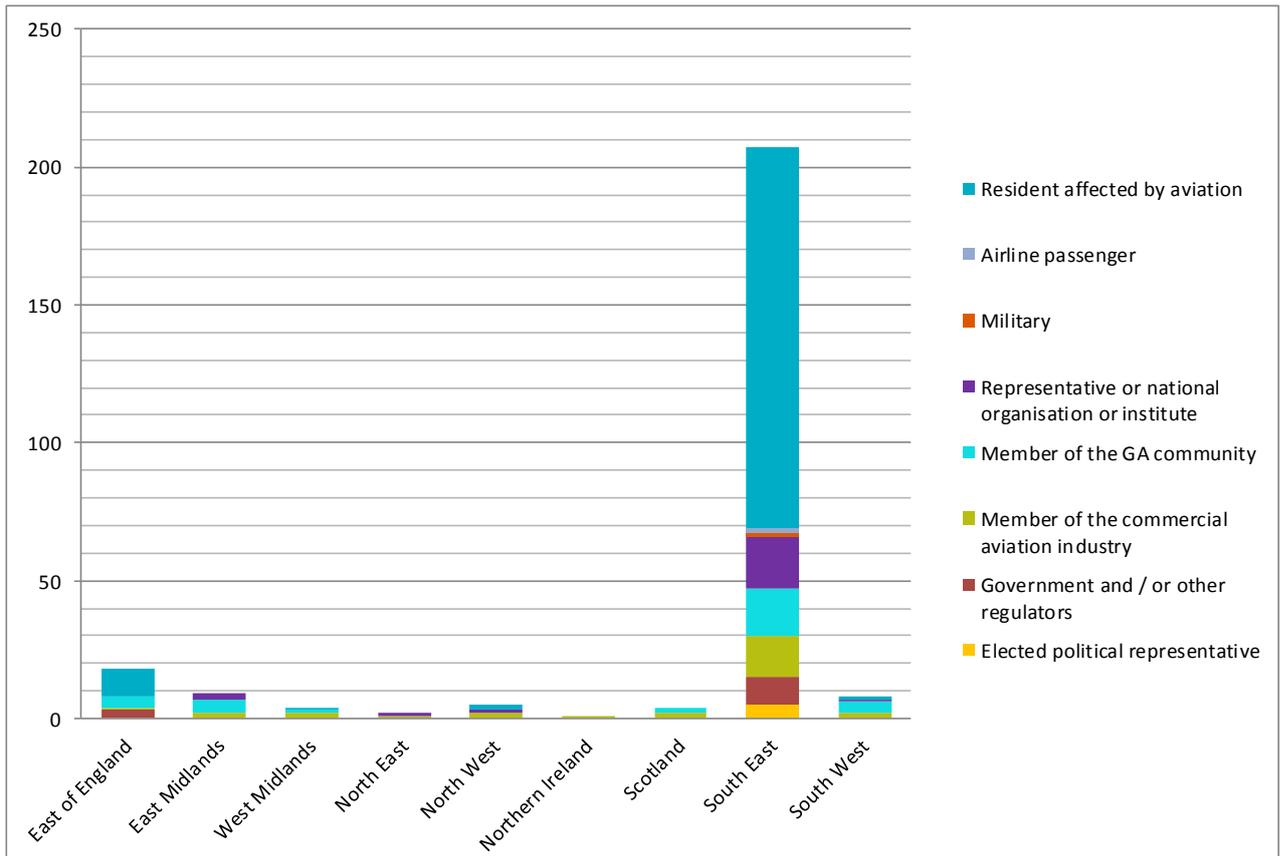


1.7 A full list of respondents appears at the end of this chapter.

## Geographic spread of responses

1.8 Of the 263 responses, 207 (79%) identified themselves as based in the South East, 18 (7%) as East of England, nine (3%) as East Midlands and eight (3%) as South West. The remaining 21 respondents were spread between six other parts of the country, with between one and five responses from each. There were no respondents from Wales.

**Figure 1.2: Category of respondent by geographic region**



## Note regarding stakeholder groups

- 1.9 Chapters 4 and 5 explain how we analysed the responses in depth using quantitative and qualitative approaches. We did not treat the engagement process as a referendum but as an opportunity to understand the sentiments and suggestions of different, sometimes polarised stakeholder groups. It was also a useful opportunity for any stakeholder to raise new ideas or suggestions with the CAA directly.

## Questions

- 1.10 Of our six questions, five comprised both a 'closed' multiple-choice and an 'open' free-text element in which respondents could give reasons for their answers. One of the questions invited only an 'open' free-text response. The questions have been reproduced below.

**Question 1: Do you agree with the overall approach taken in the strategy, as described here?**

Yes Mostly No

Please provide additional comments [Free-text box]

**Question 2: Has the CAA identified the right Government policies in this strategy?**

Yes	Mostly, but some Government policies are not relevant	Mostly, but some existing Government policies are missing	No
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Please provide additional comments [Free-text box]

**Question 3: Do you agree with the 14 initiatives set out in the strategy?**

Yes	Mostly, but some initiatives are not relevant	Mostly, but some other initiatives are missing	No
-----	---	--	----

Please provide additional comments [Free-text box]

**Question 4: Have we identified the right gaps? Are there any that we have not identified?**

[Free-text box]

**Question 5: Do you agree with our approach of asking those organisations tasked with delivering the initiatives to set out deployment plans to identify the means (resources) necessary?**

Yes	No
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Please provide additional comments [Free-text box]

**Question 6: The draft governance structure in this document was developed by the Department for Transport, CAA and NATS working together. Do you agree with the approach set out here?**

Yes	Mostly	No
-----	--------	----

Please provide additional comments [Free-text box]

## Engagement exercise

- 1.11 On 19 July 2018 we contacted approximately 8,000 individuals and organisations directly about the stakeholder engagement exercise through our SkyWise alert system. We also sent out a targeted e-mail to more than 500 recipients on the same day, with a further follow-up reminder sent on 28 August 2018.
- 1.12 We made stakeholders aware of the exercise whenever we attended a relevant meeting, including the Community Discussion Forum, the Department for Transport's relevant focus group sessions, the General Aviation Partnership, and the Delivery Steering Group for the Future Airspace Strategy.
- 1.13 Although there was no requirement for us to invite responses on the draft document, we were pleased to have been able to provide this opportunity to stakeholders as part of our desire to be transparent and to listen to all views.

## List of those responding by self-declared category

---

### Member of the commercial aviation industry (31)\*

#### Airports (11)

- Bristol Airport
- Cornwall Airport Newquay
- Gatwick Airport
- Heathrow Airport
- Highlands and Islands Airports
- Humberside International Airport
- London City Airport
- Manchester Airports Group
- Newcastle International Airport
- two airports or airport groups which preferred not to be identified

#### Airlines (3)

- British Airways
- Cathay Pacific
- Virgin Atlantic Airways

#### Consultancies (1)

- one consultancy which preferred not to be identified

#### Other (16)

- Airport Operators Association (AOA)
- Association of Remotely Piloted Aircraft Systems UK (ARPAS UK)
- Future Airspace Strategy Implementation South (FASI-S) Steering Group
- International Air Transport Association (IATA)
- NATS
- two individuals (one a commercial pilot)
- nine groups or individuals who preferred not to be identified

### Member of the General Aviation community (31)

- British Microlight Aircraft Association (BMAA)
- 30 individuals

### Resident affected by aviation (152)\*\*

- Chertsey Society
- Heathrow Association for the Control of Aircraft Noise (HACAN)
- Luton And District Association for the Control of Aircraft Noise (LADACAN)
- Nutfield Conservation Society (NCS)
- Richmond Heathrow Campaign
- St Albans Quieter Skies (STAQS)
- 146 individuals

### Government and/or other regulators (13)

- Chiltern District Council
- Essex County Council
- Hertfordshire County Council
- Kent County Council

- Local Authorities Aircraft Noise Council (LAANC)
- London Borough of Hounslow
- London Borough of Newham
- Royal Borough of Windsor and Maidenhead
- Runnymede Borough Council
- St Albans City & District Council
- Transport for London
- Warnham Parish Council
- One individual (not responding in an official capacity), who preferred not to be identified

**Elected political representative (5)\*\*\***

- Councillor David Hilton
- Salfords and Sidlow Parish Council
- Whitehall Town Council
- two councillors who preferred not to be identified

**Representative or national organisation/institute (28)\*\*\*\***

## Airport Consultative Committees (4)

- Aberdeen International Airport Consultative Committee
- Doncaster Sheffield Airport Consultative Committee
- Gatwick Airport Consultative Committee (GATCOM)
- Liaison Group of UK Airports Consultative Committees (UKACCs)

## Other (24)

- Aviation Communities Forum
- Aviation Environment Federation (AEF)
- Board of Airline Representatives (BAR UK)
- British Helicopter Association
- British Kite Flying Association
- British Parachute Association
- Communities Against Gatwick Noise and Emissions (CAGNE)
- Campaign to Protect Rural England: Hampshire Branch
- Future Airspace Strategy Industry Implementation Group (FASIIG)
- Guild of Air Traffic Control Officers (GATCO)
- General Aviation Alliance
- National Endowment for Science, Technology and the Arts (Nesta)
- Local Government Association
- Met Office
- Prestbury Parish Council
- Residents Against Aircraft Noise
- Royal Aeronautical Society
- Sustainable Aviation
- The Honourable Company of Air Pilots
- UK Flight Safety Committee
- one individual
- three groups which preferred not to be identified

**Military (1)**

- Ministry of Defence

**Airline Passenger (2)**

- two individuals

\* Note that the commercial aviation industry category includes four respondents who are related to drones, and therefore could conceivably have been categorised as General Aviation community. We have not altered these categorisations.

\*\* Note that LADACAN and the Chertsey Society declared themselves under the 'Resident affected by aviation' category. We have not altered these categorisations.

\*\*\* Note that Salfords and Sidlow Parish Council and Whitehall Town Council declared themselves as elected political representatives rather than Government and / or other regulators. We have not altered these categorisations.

\*\*\*\* Note that the General Aviation Alliance, CAGNE, Prestbury Town Council, an airport and a parish councillor declared themselves under the 'Representative or national organisation/institute' category. We have not altered these categorisations.

## Chapter 2

# Outcome of stakeholder engagement – a summary

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## Changes made to the CAA's Airspace Modernisation Strategy to address issues raised by respondents

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- 2.1 Below is a summary of the changes we are making to the draft Airspace Modernisation Strategy. Key points from the responses to our engagement exercise are summarised in Chapters 3 to 5. We published all responses to the engagement exercise unless permission was withheld.

### The joint objective for airspace modernisation

- 2.2 The CAA and Department for Transport have redrafted the joint objective for airspace modernisation. Ultimately the trade-offs between different airspace outcomes must be guided by public policy rather than the regulator. Public policy rests with our democratically elected Government, and the regulator should act in accordance with policy and legislation.

### The governance structure

- 2.3 The Airspace Modernisation Strategy includes new sections and a supporting annex on the governance structure with more detail on the CAA and Department for Transport's role as co-sponsors. This also includes information about how the sponsors will commission organisations and ask organisations with a delivery role to demonstrate their impartiality and the evidence base supporting their work.
- 2.4 There is also more information on the Delivery Monitoring and Oversight (DMO) function, a role only briefly suggested in the draft document and which the Department for Transport has now asked the CAA to set up.
- 2.5 The governance architecture has been clarified, including setting out which delivery groups exist at this stage and where further information about membership can be found; the specific groups must remain flexible at this stage but will develop as the initiatives develop.

### Ends

- 2.6 The latest position on the exit from the EU has been clarified where possible.
- 2.7 The strategy includes specific reference to the Government policy on making best use of existing infrastructure.
- 2.8 We have stated our intention to update the strategy in 2020, once the Government's Aviation Strategy is finalised (or later if the Aviation Strategy is published later). This will include reviewing every initiative to determine whether it is compatible with noise policy, if noise policy is changed through the Aviation Strategy. We may, at that point, strengthen the requirements or detail as to how initiatives should be delivered to comply with such noise policy.

- 2.9 We have clarified that, in circumstances where the CAA believes the policy framework or evidence base does not provide a clear solution to any trade-offs that arise between the delivery of airspace modernisation initiatives or the different airspace design changes identified in the forthcoming masterplan, we will request guidance from Government. Public policy ultimately rests with our democratically elected Government, and the regulator should act in accordance with policy and legislation.

## Ways

- 2.10 A new initiative has been included to ensure SESAR<sup>3</sup>-compliant air traffic management (ATM) improvements to infrastructure, systems and procedures are captured.
- 2.11 Throughout the initiatives, changes have also been made to:
- clarify the role and requirements of the Ministry of Defence
  - reference the separate but related Industry Resilience Group initiatives that are underway
  - clarify what we mean by 'integration' and airspace structures including both controlled and uncontrolled airspace
  - set out further work for CAA to lead. For example, we will need to undertake further work and engagement in 2019 before we can offer further detail on how the initiatives concerning Part-ATS and electronic conspicuity will be realised. The same is true for the market structure for air traffic management solutions for drones
  - offer further information to address concerns received on spectrum-related resilience issues.

## Means

- 2.12 The approach set out in Chapter 6 of the draft strategy has been confirmed – namely, that timelines and delivery plans must be set out by the organisations that will undertake the initiatives in order to deliver new airspace design, concepts and technologies.
- 2.13 The requirements for a design masterplan have been modified and stated in more detail. It has been made clear that the CAA and Department for Transport, acting as co-sponsors of airspace modernisation, intend to commission further work from NERL to produce a masterplan of upcoming airspace changes, which are necessary to, for example, increase airspace capacity, bring noise benefits, or release airspace for General Aviation or other airspace users. This masterplan would be underpinned by an obligation on NERL in its economic licence.

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<sup>3</sup> Single European Sky ATM Research.

## Chapter 3

## Summary of the responses made

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### Our analysis of the responses

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- 3.1 Five of our six online questions had both a multiple-choice and a free-text element. One had a free-text element only.
- 3.2 Chapters 4 and 5 explain how we analysed the responses in depth using quantitative and qualitative approaches. We analysed common themes and suggestions made by stakeholders, including noting when different stakeholder groups were polarised in their views. We then considered all this information and whether and how we might improve the Airspace Modernisation Strategy to address the findings.

### Summary of the most significant findings from the multiple-choice questions

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- 3.3 The multiple-choice questions we asked provided quantitative feedback about our draft Airspace Modernisation Strategy. The multiple-choice format was intended as a simple tick-box exercise for respondents to share their overall sentiment. The responses are not intended to be treated as a referendum but to highlight the different, often polarised attitudes of different stakeholder groups. The qualitative analysis of the text written by respondents provides further detail and context on the key sentiments, views or suggestions raised.

### Overall approach

- 3.4 The first question asked to what extent respondents agreed with the overall approach taken in the draft strategy (yes, mostly, no):
- overall, 39% of respondents said that they agreed or mostly agreed with the approach as set out in the draft strategy (question 1), 5% did not answer
  - residents, who made up the majority of respondents (152 of 263), were most likely to answer 'no', with 83% disagreeing
  - members of the General Aviation community mostly agreed with the overall approach, with 90% saying they agreed or mostly agreed.
- 3.5 These results make our qualitative analysis of respondents' sentiments and recommendations all the more important. To understand why our approach to the strategy was not deemed adequate by a stakeholder group, we need to understand respondents' reasoning. We have therefore gone into greater detail in Chapter 5 of this report.

## Government policies

- 3.6 The second question asked if we had identified the right existing Government policies (yes, mostly but some policies are irrelevant, mostly but some policies are missing, no).
- 3.7 A similar pattern was evident in the responses to question 2:
- overall, 41% of respondents said that they agreed or mostly agreed compared to 50% who disagreed (9% did not answer)
  - of those identifying as residents affected by aviation, 78% disagreed that we had identified the right policies
  - eighty-nine per cent of national or representative organisations agreed that we had, or mostly had, identified the right policies
  - this was followed closely by members of the General Aviation community at 84% in agreement and commercial aviation industry at 74%.

## Initiatives

- 3.8 Question 3 asked if respondents agreed with the 14 initiatives (yes, mostly but some initiatives are irrelevant, mostly but some initiatives are missing, no):
- members of the General Aviation community had the strongest percentage in favour at 94%
  - commercial aviation industry and national representatives were around 75% in favour
  - seventy-nine per cent of residents affected by aviation disagreed
  - overall, 41% of respondents said that they agreed or mostly agreed with the initiatives; 7% did not answer.

## Gaps

- 3.9 Question 4 only invited free-text answers with no multiple-choice options and therefore there is no quantitative analysis to report.

## Deployment plans

- 3.10 Question 5 asked if respondents agreed with our approach of asking those organisations tasked with delivering the initiatives to set out deployment plans to identify the means (resources) necessary? (yes, no):
- seventy-one per cent of members of the General Aviation community agreed with this approach
  - commercial aviation industry and national representatives were 58% and 68% in favour respectively
  - seventy-four per cent of residents affected by aviation disagreed with our suggested approach
  - overall, 37% of respondents said that they agreed, and 12% did not answer.

## Governance structure

- 3.11 Question 6 asked if respondents agreed with our approach set out in the draft governance structure which was developed by the Department for Transport, CAA and NATS working together (yes, mostly, no):

- for this question the commercial aviation industry was the group with the largest percentage in favour (yes, mostly) at 74%
- seventy-one per cent of members of the General Aviation community were in favour, agreeing or mostly agreeing, whereas 80% of residents disagreed
- overall, 35% of respondents said that they agreed, and 8% did not answer.

## Summary of the qualitative analysis of respondents' free-text responses

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- 3.12 All of our six questions included an 'open' element. This means that in addition to any multiple-choice, closed questions, respondents were offered an open box to write free text sharing their reasons and views. In addition to specific recommendations, we found a number of recurring themes arising in the free-text responses.
- 3.13 We used a basic qualitative research method to analyse the free-text responses which involved identifying a list of themes raised by respondents, and then applying that to all question responses. The key themes emerging in each response were noted so that, where possible, they could be analysed quantitatively (i.e. so that we know how many respondents, and of which stakeholder group, raised a particular topic or concern).
- 3.14 In analysing the responses we noticed that nearly half of those identifying as residents responded with identical or very similar text. This text stated their disagreement with the draft objective for airspace modernisation and usually repeated this point for each of the six questions the CAA asked.

### Common themes

- 3.15 The themes commonly discussed by respondents were as follows:
- the draft objective for airspace modernisation
  - governance structure
  - funding and resources
  - vested interests
  - emerging technology including drones and electronic conspicuity
  - policy
  - concern or dissatisfaction.
- 3.16 The draft objective for modernisation and the proposed governance structure received the most attention, with comments on 651 and 146 occasions respectively.
- 3.17 In terms of the draft objective for airspace modernisation, the comments received could be grouped into three different statements, which tended to be raised by different stakeholder groups, often quite passionately:
- residents affected by aviation were more likely to suggest that the focus should be on noise reduction and other environmental and health issues, rather than growth

- members of the General Aviation community were more likely to express concerns that airspace may become constrained, more complex or would be difficult to influence
  - other respondents urged that the objective would need to carefully consider the trade-offs between a range of different issues.
- 3.18 There were similar levels of governance issues raised by residents, national representatives and the commercial aviation industry. We recorded four different sentiments:
- residents affected by aviation and government bodies (i.e. local authorities or parish councils) were more likely to suggest that community groups or the Independent Commission on Civil Aviation Noise (ICCAN) should be involved in the governance structure
  - the General Aviation community was more likely to suggest that General Aviation specifically should be more involved in the governance structure
  - the commercial aviation industry and national representative organisations were more likely to suggest that industry should be involved at the top of the governance structure.
  - a mix of different stakeholders with different reasons wanted the Government and/or the CAA to hold industry to account more in delivery.
- 3.19 Funding and resourcing issues were mainly raised by the commercial aviation industry, the majority either suggesting that the Government should fund the modernisation programme, or that those that were funding it should be more involved in the governance structure. Smaller organisations were concerned that they would not have the resources to participate fully or influence change. Some suggested that the CAA needed to increase its resourcing.
- 3.20 Often raised in relation to the governance structure was the issue of vested interests. The main sentiment being raised was the need for independent oversight or independent programme management. The commercial aviation industry appeared to be more focussed on NATS (or NERL), whereas residents suggested there was a general lack of impartiality within the aviation industry.
- 3.21 In terms of technology, the specific points raised were mostly in relation to satellite-based navigation, drones and electronic conspicuity. The commercial aviation industry generally advocated the use of technology to improve efficiency, whereas residents were concerned about the concentration of flightpaths that could occur or had resulted from previous trials. Some respondents also commented on the costs and lack of detail of what the solutions could mean for them.
- 3.22 Some of the above themes were related to areas that we could not materially change in the strategy, for example relating to existing Government policy or a dissatisfaction with the CAA or aviation in general. However, all of these themes are considered in more detail in Chapter 5.

## Chapter 4

# Quantitative analysis of multiple-choice questions

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## Introduction

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- 4.1 This chapter considers the responses to the multiple-choice questions. It does not consider any accompanying text, which is analysed in Chapter 5. We begin with some important notes about the analysis. We then summarise some significant findings from the analysis, and then go on to analyse the results of each multiple-choice question in turn.

## Notes on the analysis

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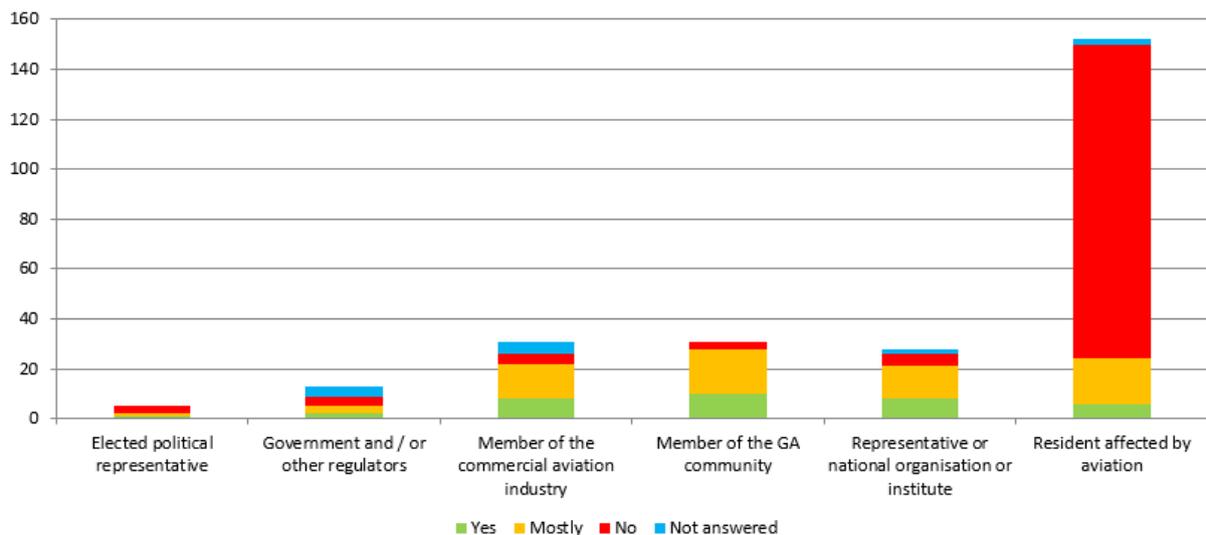
- 4.2 Of the 263 responses, five were not submitted via the online form, but were instead sent by email. Of these five we were unable to include four offline responses in our quantitative analysis as they were not arranged in our question format and could not be transferred to the online dataset. A further six respondents, who submitted via the online form, did not answer any of the multiple-choice questions.
- 4.3 Four respondents sent both an online and a supporting offline response, but these were combined in order to avoid duplication.
- 4.4 Of the 152 residents who responded, 74 (49%) used identical or very similar text, and mostly answered no to all questions.
- 4.5 As explained in Chapter 1, we have not altered respondents' self-declared categorisation, as we did not deem it appropriate to reallocate these responses between categories.

## Questions asked in relation to the draft strategy

### Question 1: Do you agree with the overall approach taken in the strategy, as described here?

*Conclusion: Most residents disagreed with the approach. The commercial aviation industry, General Aviation community and representative or national organisations mostly agreed with the approach. Other groups were mixed.*

**Figure 4.1: Responses to Q1 by respondent group**



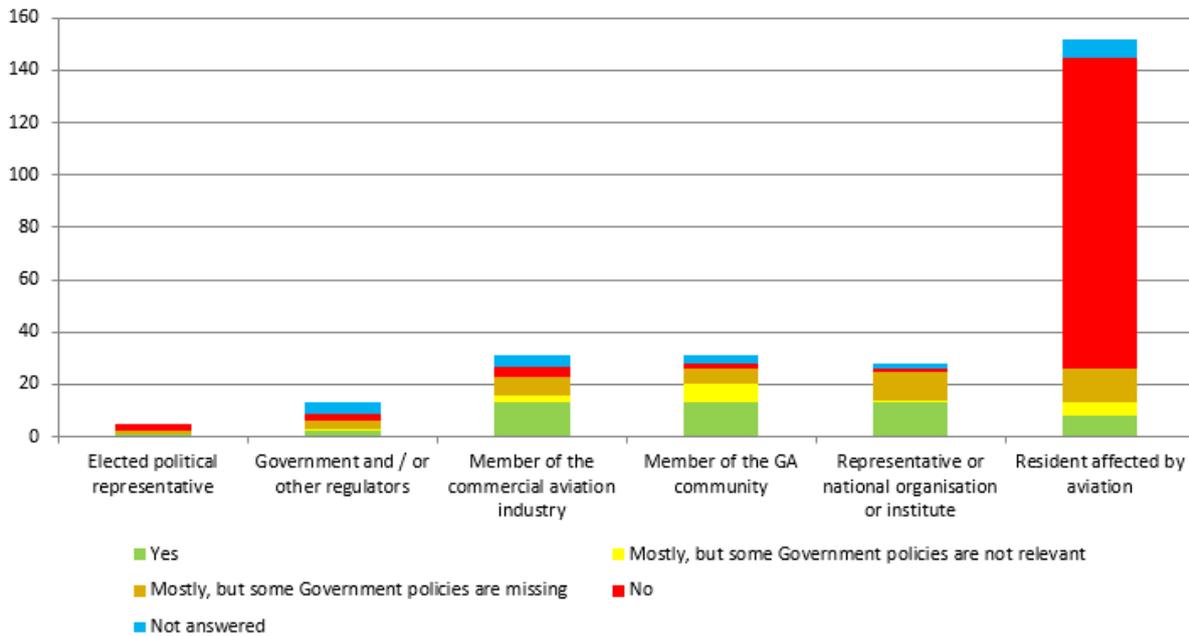
**Note:** The Military response was offline and did not answer the question format. Two airline passengers responded, one agreed (yes) and one disagreed (no).

- 4.6 Question 1 was an overarching question at the start of the survey, seeking general views on the overall approach to the strategy in its entirety.
- 4.7 A small majority of respondents (56%, 146 out of 263) disagreed with the approach, compared to one quarter (25%, 67 out of 263) who 'mostly' agreed, and 36 (14%) who agreed with the approach set out. Approximately half of the respondents answering 'no' were identified as a group answering with identical or very similar responses.
- 4.8 Looking at the different respondent groups, 83% of residents (126 out of 152) and 60% of elected political representatives (3 out of 5) responding did not agree with the approach.
- 4.9 Thirty-eight per cent of those answering as Government and/or other regulators agreed with the approach, and one third of this group didn't answer the question. Other groups with a majority in agreement included the commercial aviation industry (71%), the General Aviation community (90%) and representative organisations (75%).

### Question 2: Has the CAA identified the right Government policies in this strategy?

Conclusion: Mixed views. Overall a narrow majority of respondents disagreed, dominated by residents. Most other groups agreed that we had, or mostly had, identified the right policies.

Figure 4.2: Responses to Q2 by respondent group

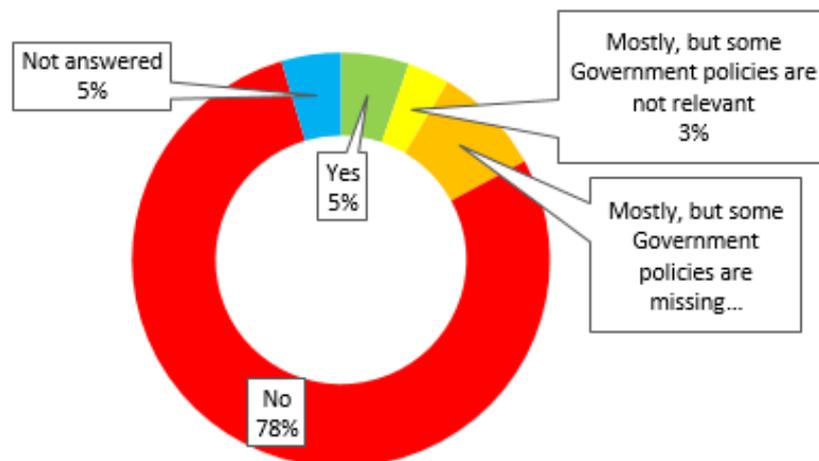


Note: The Military response was offline and did not answer the question format. Two airline passengers responded, one agreed (yes) and one did not answer.

4.10 Overall, half of the respondents (50%, 132 out of 263) disagreed that we had identified the right Government policies, compared to one fifth (19%, 51 out of 263) who agreed, and 22% (58) who ‘mostly’ agreed with the approach set out. As noted above, approximately half of the respondents answering ‘no’ were identified as a group answering with identical or very similar responses.

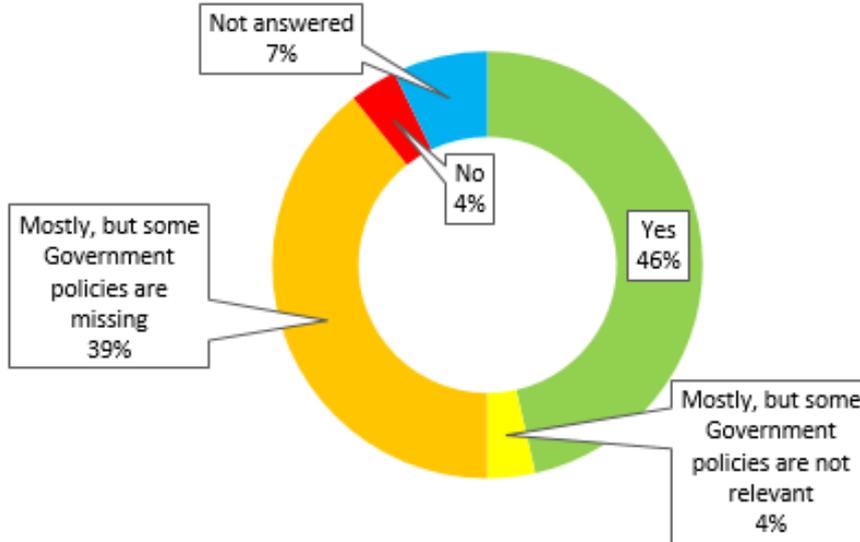
4.11 Looking at the different respondent groups, 78% of residents (119 out of 152) and 60% of elected political representatives (3 out of 5) responding did not agree we had identified the right policies.

Figure 4.3: Responses to Q2 from residents affected by aviation



4.12 The groups more likely to agree included Government and/or other regulators (46% – more than a quarter didn't answer), the commercial aviation industry (74%), the General Aviation community (84%) and representative organisations (89%) either agreed or mostly agreed that we had identified the right policies.

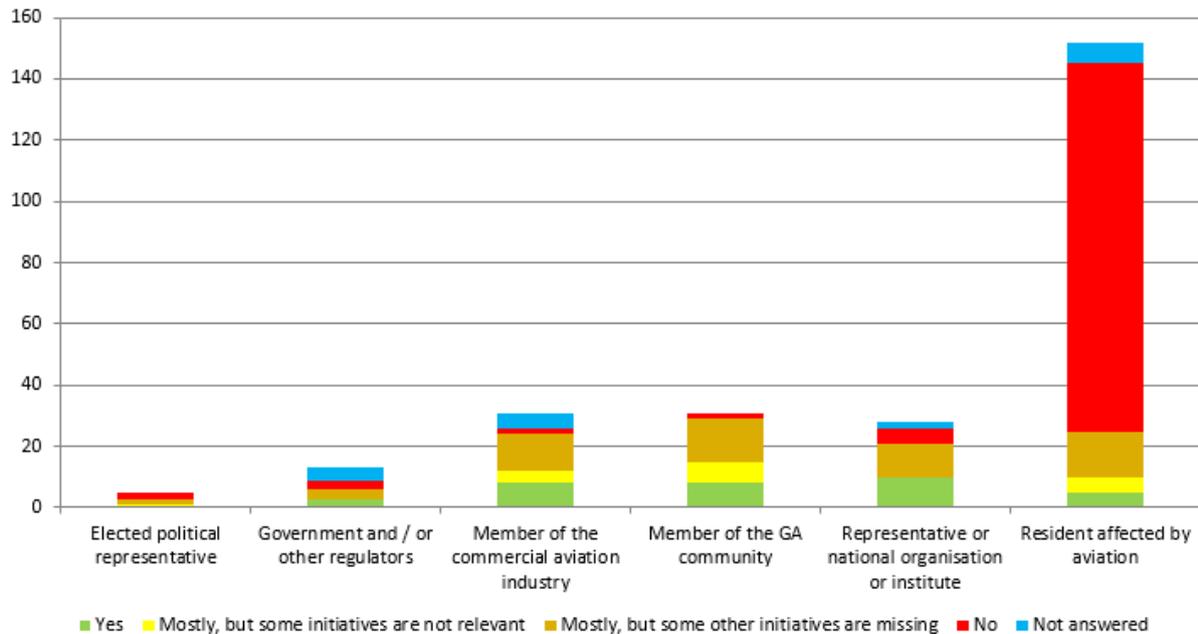
Figure 4.4: Responses to Q2 from national representative organisations



**Question 3: Do you agree with the 14 initiatives set out in the strategy?**

*Conclusion: Mixed views. Overall a narrow majority of respondents disagreed, dominated by residents. Most other groups agreed or mostly agreed with the 14 initiatives.*

Figure 4.5: Responses to Q3 by respondent group



Note: The Military response was offline and did not answer the question format. Two airline passengers responded, one agreed (yes) and one disagreed (no).

- 4.13 Overall, roughly half the respondents (51%, 135 out of 263) disagreed with the 14 initiatives. As noted above, approximately half of the respondents answering 'no' were identified as a group answering with identical or very similar responses. Looking at the different respondent groups, 79% of residents (120 out of 152) responding did not agree with the initiatives.
- 4.14 All other groups (with the exception of airline passengers, of which there were two and whose views were split, and the Military which did not answer the online questions) were more in favour of the 14 initiatives.
- 4.15 Those who either agreed or mostly agreed that we had identified the right policies included: elected political representatives (60%); Government and/or other regulators (46% – more than a quarter didn't answer); the commercial aviation industry (77%); the General Aviation community (94%) and representative organisations (75%).
- 4.16 The second most common response overall (57 out of 263) and the most common response within the groups in favour of the initiatives was 'mostly, but some other initiatives are missing'. Members of the General Aviation community chose this answer 14 out of 31 times.

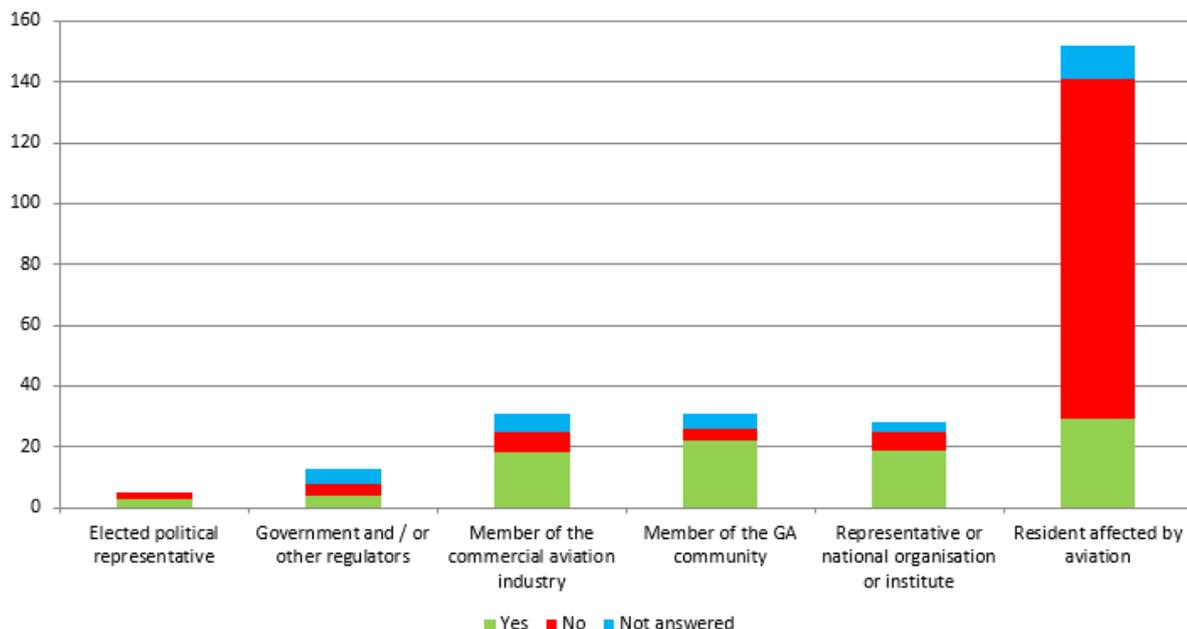
#### Question 4: Have we identified the right gaps?

- 4.17 This question had no multiple-choice option. The text provided by respondents is analysed in the next chapter.

#### Question 5: Do you agree with our approach of asking those organisations tasked with delivering the initiatives to set out deployment plans to identify the means (resources) necessary?

*Conclusion: Residents affected by aviation disagreed with this approach whereas the General Aviation community and commercial industry were mostly in agreement with it.*

**Figure 4.6: Responses to Q5 by respondent group**



**Note: The Military response was offline and did not answer the question format. Two airline passengers responded, one agreed (yes) and one disagreed (no).**

- 4.18 There was a similar pattern to previous questions with roughly half of respondents (52%, 136 out of 263) disagreeing with the CAA tasking others with producing deployment plans. As noted above, approximately half of the respondents answering 'no' were identified as residents answering with identical or very similar responses.
- 4.19 Looking at the different respondent groups, 74% of residents (112 out of 152) responding did not agree.

**Figure 4.7: Responses to Q5 by different stakeholder groups**

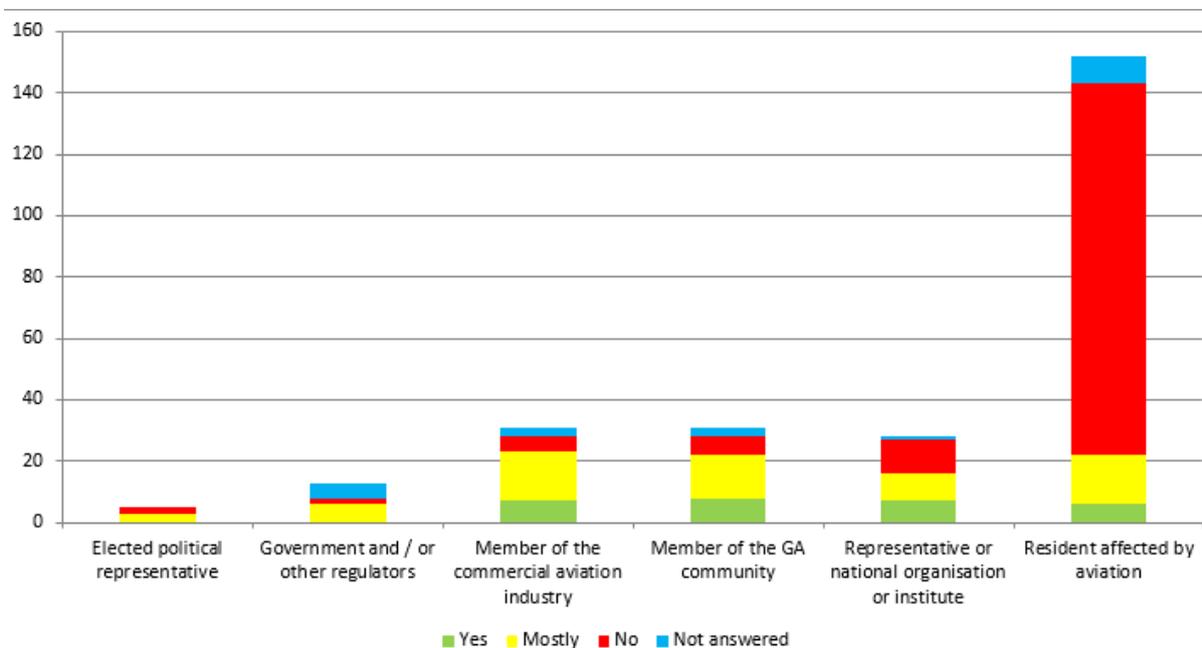


- 4.20 All other groups (with the exception of Government or other regulators, which was evenly split) had a majority answering 'yes'. This was strongest in the General Aviation community.
- 4.21 Most people responding as the commercial aviation industry (58%), the General Aviation community (71%), representative organisations (68%) and elected political representatives (60%), answered yes.

**Question 6: The draft governance structure in this document was developed by the Department for Transport, CAA and NATS working together. Do you agree with the approach set out here?**

*Conclusion: Most groups were more positive about the governance structure, but again a significant number of residents did not agree with the approach.*

**Figure 4.8: Responses to Q6 by respondent group**



**Note: The Military response was offline and did not answer the question format. Two airline passengers responded, one agreed (yes) and one disagreed (no).**

- 4.22 A small majority of respondents (56%, 148 out of 263) disagreed with the Governance structure. As noted above, approximately half of the respondents answering 'no' were identified as a group answering with identical or very similar language.
- 4.23 Looking at the different respondent groups, 80% of residents (121 out of 152) responding did not agree.
- 4.24 All other groups (with the exception of airline passengers, of which there were only two and who answered differently, and the Military, which did not answer online questions) had a majority answering 'yes' or 'mostly'.
- 4.25 Respondent types who tended to agree or mostly agree with the approach included Government or other regulators (46% – more than one third didn't

answer); elected political representatives (60%); the commercial aviation industry (74%); the General Aviation community (71%); and representative organisations (57%).

## Chapter 5

# Qualitative analysis of free-text responses

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## Qualitative analysis

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5.1 This chapter considers the key themes that were raised with us in open-text responses, and who raised them.

### Open-text questions

5.2 Each of our six questions included an open element. This means that in addition to any multiple-choice, closed questions, respondents were offered an open box to write free text sharing their reasons and views.

5.3 Most respondents took the opportunity presented by the free-text responses to share their views, evidence or rationale for their answers. In this part of the report we summarise the most common suggestions or sentiments, and who raised them.

### Method

5.4 We used a basic qualitative research method to analyse the free-text responses which involved identifying, and then applying, a list of themes. To create a list of themes, nine members of CAA staff each read a cross-section of five different responses in full and listed the topics, ideas, concerns and comments that were raised in them. The staff then met and shared those lists, and discussed them until a definitive list of themes was agreed. These nine staff members then read all 263 responses from scratch and noted (or, using the software built into the consultation hub we used, 'tagged') the themes that arose in each and every answer. This method ensured that:

- every individual response was read from start to finish by a member of CAA staff
- the themes we discuss in this section were generated by the respondents in their free text responses – they were not pre-identified by the CAA but are the key points raised directly by the respondents themselves, and
- key themes emerging in each response were noted so that, where possible, they were analysed quantitatively (i.e. so that we know how many respondents, and of which stakeholder group, raised a particular topic or concern).

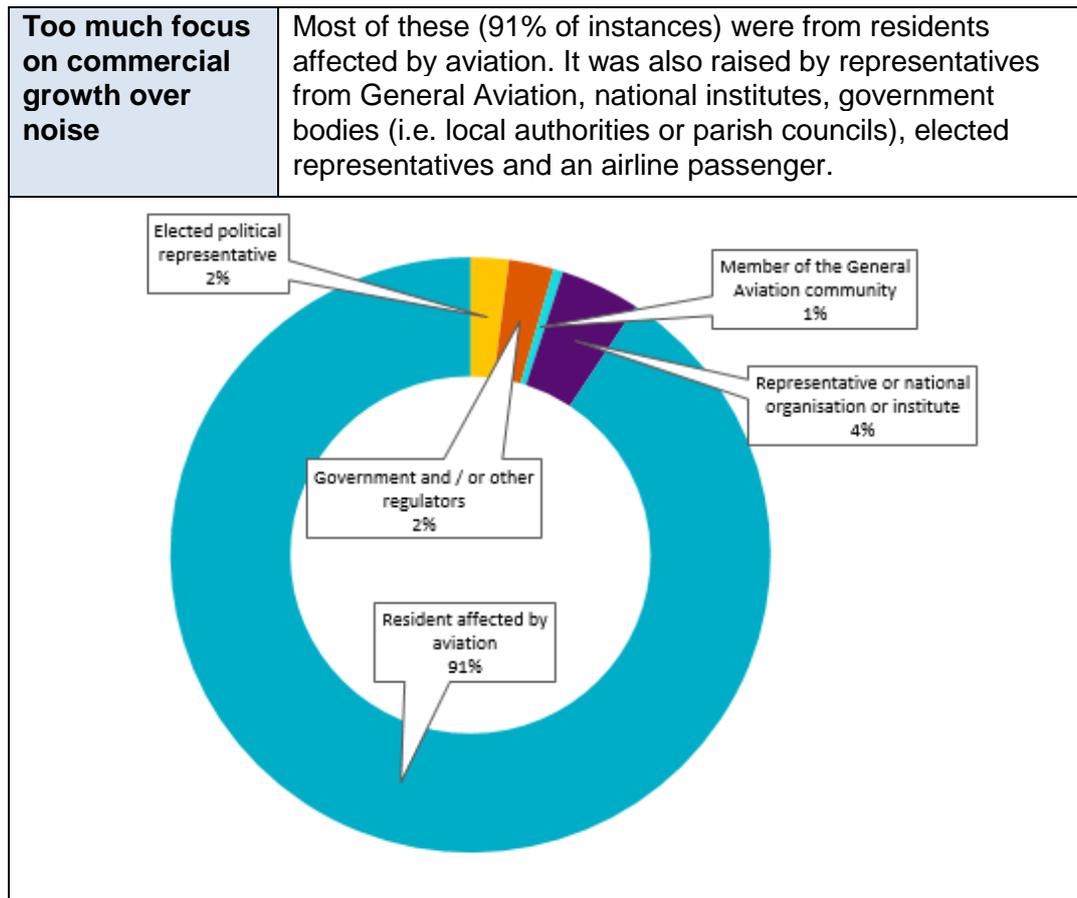
5.5 When we say that a topic was raised a certain number of times, or refer to instances of that topic being discussed, the numbers refer to one respondent's answer to one question. This is because we could only analyse the responses by analysing each individual response to each question and noting the themes and views raised within it once. For example: if a respondent mentions 'commercial growth' once in response to a particular question, that counts as one instance; if they mentioned it five times in response to that same question, it still only counts as one instance; if they mentioned it in response to five separate questions, that counts as five instances.

- 5.6 The themes commonly discussed by respondents are identified below.
- 5.7 In analysing the responses we noticed that, of the 152 residents who responded, 74 (49%) responded with identical or very similar text. They stated that “it is pointless to comment in detail because the document starts from the wrong premise”, and often commented on the draft objective by stating that “There is an apparent presumption that whatever maximises growth potential is acceptable regardless of whether or not it delivers possibilities for reduction of noise for communities affected by the industry's operations”. This language was usually repeated for each of the six questions the CAA had asked.

### Draft objective for airspace modernisation

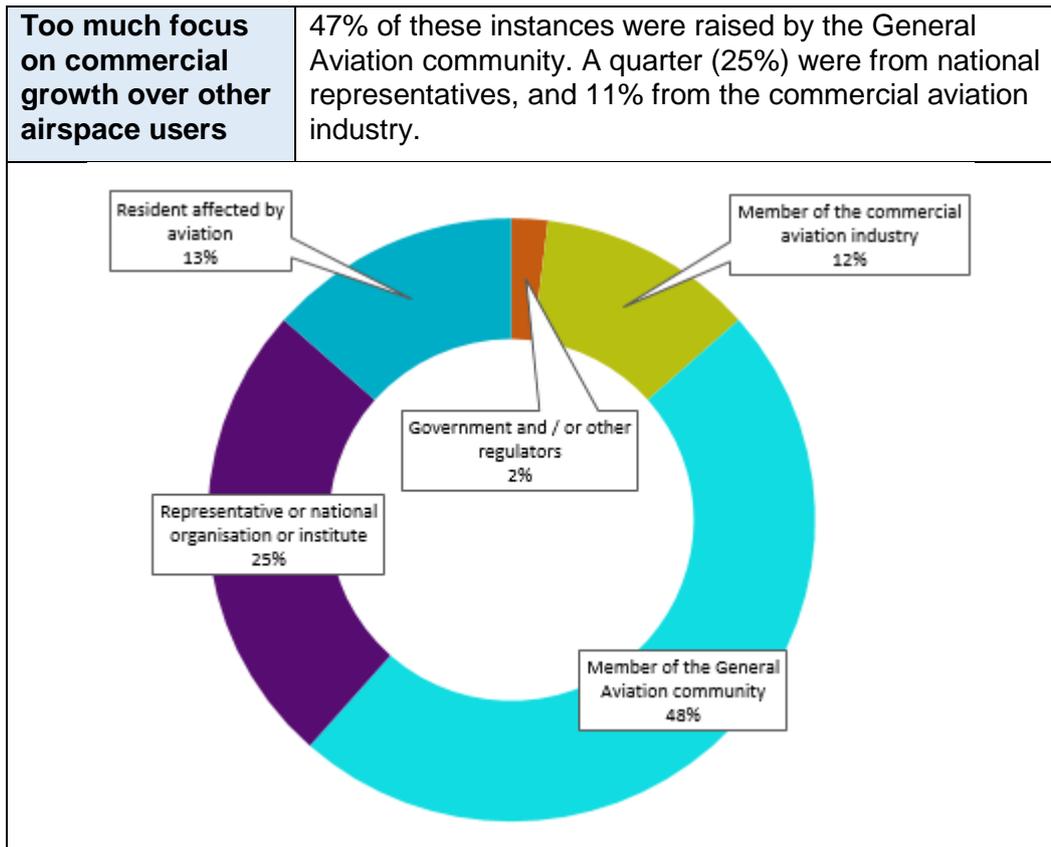
- 5.8 One of the most commonly raised topics was the draft objective for airspace modernisation.
- 5.9 The draft objective was prepared by the Department for Transport and the CAA together. It included the following statement: “Our objective is to ensure that airspace capacity is not a constraint on the growth of commercial aviation, with the constraint to growth instead becoming the number of runways or restrictions imposed on the use of those runways by government or planning authorities as a condition of that growth. This growth has to be managed to ensure that noise and other environmental impacts are managed in alignment with policy and law, and that other airspace users maintain appropriate access to airspace.”
- 5.10 Respondents offered comments about the direction offered by this statement on 651 occasions, across all respondents and every question. Those comments can be grouped into three commonly expressed sentiments:
- the objective focuses too much on commercial growth at the expense of residents affected by aviation noise
  - the objective focuses too much on commercial growth at the expense of other airspace users
  - the objective must carefully manage the trade-off between commercial growth and other priorities (respondents expressing this statement would acknowledge the complexity and need for careful handling without offering a particular judgement).
- 5.11 These different statements tended to be raised by different stakeholder groups, often quite passionately.
- 5.12 The following tables and charts show the different sentiments of the different stakeholder groups. Residents affected by aviation were more likely to suggest that the focus should be on noise reduction and other environmental or health issues.

Figure 5.1: Too much focus on commercial growth vs noise



- 5.13 More than 60 residents stated *“This is not an objective that is shared by local communities. There is an apparent presumption that whatever maximises growth potential is acceptable regardless of whether or not it delivers possibilities for reduction of noise for communities affected by the industry’s operations”*.
- 5.14 The Aviation Environment Federation commented: *“The draft Airspace Modernisation Strategy (AMS) states that its objective is to “ensure that airspace capacity is not a constraint on the growth of commercial aviation” by 2030... The AMS also argues, however, that “growth has to be managed to ensure that noise and other environmental impacts are managed in alignment with policy and law”, and suggests that this be delivered by way of “the number of runways or restrictions imposed on the use of those runways by government or planning authorities”. AEF believes that it may be necessary, in some circumstances, to impose constraints on airspace capacity in order to deliver environmental objectives, for example, to manage noise to acceptable levels.”*
- 5.15 The Royal Borough of Windsor and Maidenhead commented: *“This objective is premature owing to the lack of an aforementioned policy by which the government can both measure the impact of flights on populations, both in terms of noise and health impacts”*.

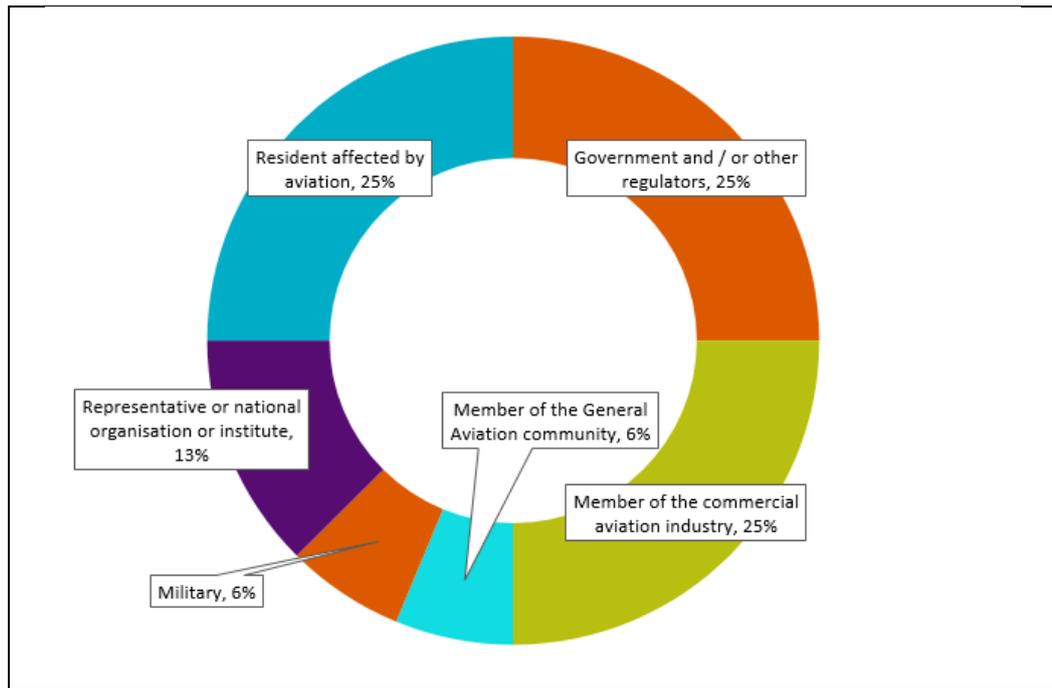
Figure 5.2: Too much focus on commercial growth vs other users



- 5.16 Members of the General Aviation community were more likely to express concerns that airspace access may become constrained, more complex or would be difficult to influence.
- 5.17 One member of the General Aviation community commented: *“GA needs to be carefully considered. Whilst commercial requirements are clearly important, there is much more to airspace than simply financial considerations.”*
- 5.18 The British Microlight Aircraft Association commented: *“We agree that there needs to be a complete overhaul of the UK airspace structure to meet the requirements for capacity, efficiency and environmental impact. However, we are concerned that if implementation is left to industry modernisation will not include a critical review of existing airspace with the intention of releasing what is underused or redundant.”*
- 5.19 Other respondents urged that the objective would need to carefully consider the trade-offs between different issues.

**Figure 5.3: Too much focus on commercial growth vs other trade-offs**

<p><b>There is a trade-off to be managed between commercial growth and other priorities</b></p>	<p>Just under a third (30% of instances) were from residents affected by aviation. This was also raised by government bodies and the commercial aviation industry.</p>
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- 5.20 Transport for London commented: *“Airspace modernisation, by allowing for more efficient use of airspace, offers the potential to support sustainable growth in aviation, minimise the economic impacts of flight delays and reduce emissions. At the same time, it is essential that no less weight is given to the potential for airspace modernisation to substantially reduce the noise impacts of aviation experienced by hundreds of thousands of people every day. Airspace modernisation must also prepare the UK for new technology – and the resulting business models that will emerge”.*
- 5.21 Newcastle Airport commented: *“The strategy contains only one strategic goal and seems to read like a list of things that are already happening. The approach needs to be more focused with balanced aims for the variety of airspace users.”* It also noted: *“Heathrow's third runway gets a mention but regional airports don't”.*
- 5.22 Runnymede Borough Council noted the many conflicting objectives, and commented: *“As a council we recognise there are many objectives which are seen as desirable by different stakeholders, some of which conflict with each other, and there is therefore a need to independently consider the interests of all stakeholders through a strategy.”*
- 5.23 Conclusions:
- the CAA and Department for Transport have redrafted the joint objective for airspace modernisation; ultimately the trade-offs between different airspace outcomes must be guided by public policy rather than the regulator, as the outcomes that any regulator seeks are determined by elected officials
  - the Department for Transport is also aiming to clarify its policy on growth, noise and health impacts in its Aviation Strategy, and the CAA's Airspace Modernisation Strategy will take any updates into account in the future.

## Governance

5.24 Governance was raised 146 times. Tables 5.1 and 5.2 below show the respondent types raising governance issues. There were similar levels from residents, national representatives and members of the commercial aviation industry.

**Table 5.1: Governance issues raised by respondent group**

Airline passenger	3%
Elected political representative	1%
Government and/or other regulators	8%
Member of the commercial aviation industry	24%
Member of the General Aviation community	11%
Military	1%
Representative or national organisation or institute	25%
Resident affected by aviation	27%
<b>Total</b>	<b>100%</b>

5.25 We recorded four different sentiments within the Governance theme as shown in Table 5.2 below.

**Table 5.2: Governance issues grouped by sentiment**

Communities or ICCAN should be more involved in the governance structure	Raised 53 times 53% of instances were from the residents. 23% were from representative organisations and 13% from government bodies (i.e. local authorities or parish councils).
General Aviation should be more involved in the governance structure	Raised 15 times Roughly half were raised by the General Aviation community. Representative organisations and the commercial aviation industry also raised this point.
Industry should be more involved at the top of the governance structure	Raised 36 times. 58% were from the commercial aviation industry, 28% from representative organisations, and 11% from General Aviation.
The Government and/or CAA should hold industry more to account in delivery	Raised 42 times Just over a quarter (26%) were raised by residents, the same from representative organisations, and 21% from the commercial aviation industry.

5.26 A lot of respondents were not specific about which group should be involved in the governance structure. Feedback was often generic, for example “communities affected should be involved” or a “community advisory group” was recommended.

5.27 One member of the commercial aviation industry suggested “*There is no reference to the inclusion of the airline operators that fund the majority of the*

*airspace modernisation initiatives or the airports that are responsible for delivering some of the most challenging aspects of the programme”.*

- 5.28 Comments from members of the General Aviation community suggested a “smaller taskforce” would be more effective.
- 5.29 Those that did specify a particular organisation to be involved in the governance structure suggested the following:
- All-Party Parliamentary Group on General Aviation (APPG-GA)
  - Association of Remotely Piloted Aircraft Systems UK (ARPAS UK)
  - Aviation Environment Federation (AEF)
  - British Microlight Aircraft Association (BMAA)
  - DEFRA or NHS (for health impacts)
  - Liaison Group of UK Airport Consultative Committees (UKACCs) or individual ACCs
  - Light Aircraft Association (LAA)
  - Ministry of Defence (MoD)
  - “Smaller Air Navigation Service Providers (ANSPs)”.
- 5.30 Often respondents made requests as to who should sit on the new UK Airspace Strategy Board, which the Department for Transport has set up.
- 5.31 Additionally, several commercial industry respondents called for a new national organisation to be established to undertake airspace modernisation, and several respondents requested more detail about the governance structure and how the different groups would operate.
- 5.32 In terms of holding industry to account, some respondents said that they expected more scrutiny and some suggested targets and fines for non-delivery.
- 5.33 Some respondents felt that industry required more policing, for example one resident commented *“There should also be some “policing” mechanism to ensure that that the rules set under the new system are fully adhered to and that any failure to adhere is challenged and penalised!”*
- 5.34 An industry representative organisation said: *“Leaving individual organisations to propose and manage airspace change runs counter to the intent to provide a modern, harmonised strategy. Proposals for system-wide modernisation should be coordinated. Thus, changes should be ‘commissioned’ in the same way that CAA intends to ‘commission’ studies into what change is required. Similarly, while it may be sensible for detail to be worked at the local level, the pace and extent of change must be coordinated (i.e. managed) at a national level to avoid a change in one part of UK disrupting activity elsewhere. Management could be undertaken by DfT or CAA, though the latter is probably better placed to ensure continuity”.*
- 5.35 Conclusions:
- the Department for Transport has now set up the UK Airspace Strategy Board and members have been invited to attend
  - the Airspace Modernisation Strategy includes new sections and a supporting annex on the governance structure with more detail on the CAA and Department for Transport’s role as co-sponsors. This includes

information about how the role is carried out such as how commissions will be made of organisations and how progress will be monitored. There is also more information on the Delivery Monitoring and Oversight (DMO) function, a role only briefly suggested in the draft document and which the Department for Transport has now asked the CAA to set up. The governance architecture has been clarified, including setting out which delivery groups exist at this stage and where further information about membership can be found; the specific groups must remain flexible at this stage but will develop as the initiatives develop.

## Funding and resources

5.36 Funding and resourcing themes were raised 45 times, mainly by the commercial aviation industry.

**Table 5.3: Funding and resourcing issues raised by respondent group**

Government and/or other regulators	4%
Member of the commercial aviation industry	69%
Member of the General Aviation community	4%
Representative or national organisation or institute	20%
Resident affected by aviation	2%
<b>Total</b>	<b>100%</b>

5.37 There were mixed sentiments raised under the theme of funding and resourcing. The majority of comments were concerned that the Government should be funding what is “*essentially a national infrastructure programme*”.

5.38 A member of the commercial aviation industry commented: “*Will government have a budget to balance the costs/benefits fairly?*”

5.39 A consultant suggested: “*As airspace is a national infrastructure asset, should consideration be given to adopting (as appropriate) similar ‘best practice’ applied to the development of the road and rail networks? In particular, would it not be appropriate for government to fund the restructuring of this vital national infrastructure asset?*”.

5.40 An airport operator suggested Government funding was vital: “*For the AMS to succeed there has to be some identified funding from Government – without it, it will fail*”.

5.41 Some respondents highlighted that a lot of organisations, particularly smaller ones, were already under-resourced.

5.42 Highlands and Islands Airports commented: “*Whilst most stakeholders will aspire to supporting and participating in the programmes the reality of the situation is that most organisations are already under resourced with ever tightening purse strings, the CAA itself being a prime example. So, HIAL suggests that thought should be put into how the strategy and the various work streams are going to be resourced and funded, including funding to cover the cost of key stakeholders engagement and participation. The high level funding arrangements should then be subsumed into the strategy for the sake of openness and transparency*”.

- 5.43 Gatco made the following comments: *“A number of the timescales appear unachievable and this is demonstrated with 8 of the 14 initiatives needing attention. If extra resources are not provided, then potentially the modernisation will be delayed or scaled back, with capacity and delay being adversely affected.... It is also important that the role of the CAA in regulating and ensuring that airspace capacity is increased safely, is kept independent and that the CAA is adequately resourced to carry out that function.”*
- 5.44 In some instances, those organisations who were likely to be ultimately paying for modernisation felt that they should have more of a role in the Governance structure. IATA commented *“As the airline community could be one of the funding agents for these activities, and whose cost recovery may feature within the CAA’s RP3 regulatory settlement, then a broad customer type role in the Supervisory Body is highly desirable”*.
- 5.45 Smaller organisations were concerned that they would not have the resources to participate fully or to influence change.
- 5.46 Humberside Airport commented: *“The UK’s ANSPs do not operate as one business and it will be difficult to enforce either an ANSP or airport to make an airspace change or to provide an Air Navigation Service that is not in its commercial interest”*.
- 5.47 Some organisations also suggested the CAA increase its resourcing of airspace changes and/or modernisation in general, so that the CAA did not hold up progress.
- 5.48 Conclusions
- the CAA is looking to increase its resourcing on airspace and will continue to set this out in relevant charges consultations
  - Government funding is a matter for Government
  - the Department for Transport’s Aviation Strategy will consider whether a mechanism is needed to force airspace changes to be developed, and whether funding will be necessary if the organisation paying the costs of that change does not directly or adequately benefit from it.

## Vested interests

- 5.49 Another theme that was raised (often in relation to our question on the governance structure) was the issue of vested interests or impartiality.
- 5.50 Some respondents said that NATS (or NERL) has a vested interest and is not impartial enough for the role given to it in the structure. This was raised 35 times in total. Thirty-four per cent of instances were from the commercial aviation industry, 26% from the General Aviation community and 17% from representative organisations.
- 5.51 Some respondents made a similar point about other industry bodies, for example airports. This was raised 27 times. Nearly a third (63%) of instances were raised by residents, and 15% were from commercial aviation industry.
- 5.52 The main sentiment being raised was the need for independent oversight or independent programme management. The commercial aviation industry

appeared to be more focussed on NATS (or NERL), whereas residents were focussed on general impartiality of the aviation industry.

- 5.53 Gatwick Airport commented: *“Gatwick fully recognises that NERL has a key role to play in shaping and executing the modernisation strategy, but we have reservations about the appropriateness of a strategy [2.35] which has NERL acting also as the overarching planner and coordinator. Not only does this pose an obvious conflict of interest [2.42] but it also jeopardises independent reporting and the holding of all stakeholders to account...”*
- 5.54 A representative group suggested that the programme could be run by: *“An executive non-departmental public body, sponsored by the Department for Transport”*.
- 5.55 A member of the General Aviation community commented: *“NATS is a commercial operation and as such has a vested interest which may conflict with other stakeholders”*.
- 5.56 A resident commented: *“the CAA and airports will drive through what they want”*.
- 5.57 Conclusions:
- the new governance structure has been outlined in the final strategy, accompanied by an annex that clarifies the different roles of organisations. It sets out how the Department for Transport and CAA, as co-sponsors of modernisation, will commission organisations and ask organisations with a delivery role to demonstrate their impartiality and the evidence base supporting their work.
  - the new Delivery Monitoring and Oversight team in the CAA will be set up to impartially oversee and report on progress across all initiatives and delivery groups.

### Emerging technology including drones and electronic conspicuity

- 5.58 We recorded the sentiment of the strategy needing to consider new/future technology 66 times. Table 5.4 below show the respondent types raising technology issues. The commercial aviation industry raised technology most often, followed by national representatives and members of the General Aviation community.

**Table 5.4: Emerging technology issues raised by respondent group**

Elected political representative	3%
Government and/or other regulators	3%
Member of the commercial aviation industry	44%
Member of the General Aviation community	15%
Military	2%
Representative or national organisation or institute	27%
Resident affected by aviation	6%
<b>Total</b>	<b>100%</b>

- 5.59 The specific points raised were mostly in relation to satellite-based navigation and the integration of drones. Commercial aviation industry members were generally advocating the use of technology to improve efficiency, whereas residents were concerned about the concentration of flightpaths that could result or had resulted from previous trials.
- 5.60 British Airways commented: *“where it can be proven to optimise the capacity and resilience of the network and where we are capable (through equipage to meet PCP legislation), the AMS should be looking to incentivise advancement of RNAV/RNP operations”*.
- 5.61 One councillor commented: *“Evidence shows that PBN as used in the trials created concentrated noise corridors which are unacceptable to communities”*.
- 5.62 NESTA commented: *“Technology aspirations for that of high level and controlled airspace should also be a consideration for low level airspace. Emerging technologies (drones) will eventually drive this”*.
- 5.63 There were also 18 instances where electronic conspicuity was specifically raised. Most respondents commented on the costs and lack of detail of what the solutions could mean for them.
- 5.64 One member of the General Aviation community commented: *“The cost and maintenance requirements of ADS-B equipment. GA pilots have recently incurred significant costs in upgrading to 8.33MHz radio equipment and a requirement to install an ADS-B transmitter would be another significant outlay”*.
- 5.65 On the other hand, another member of the General Aviation community stated: *“I am a big fan of the use of ADS-B, and in particular the low-powered versions, for GA and RPAS use”*.
- 5.66 Conclusions:
- the Airspace Modernisation Strategy will be updated in the future to reflect policy on drones and once the CAA has undertaken work to consider the economic and financial models that will be used to deliver the services required by new types of airspace users
  - the CAA will consult interested parties early in 2019 on a high-level strategy for electronic conspicuity, including the mechanisms for achieving it, before making a decision later in 2019 on its formal adoption. At this point in time, decisions about what to implement and how have not been finalised.

## Policy

- 5.67 Many respondents commented on policy issues relating to the draft Airspace Modernisation Strategy. There were 209 instances where Government policy issues were raised, of which 81 were from residents (these were generally not from the group providing identical responses highlighted above). Table 5.5 below illustrates the different sentiments of stakeholder groups.
- 5.68 Residents affected by aviation were more likely to suggest that policy on noise should be clarified or strengthened, commenting mostly on the balance in favour of growth as well as smaller number of instances where flight concentration and night noise issues were raised.
- 5.69 Some residents were specific and raised flight concentration and night noise impacts. Health issues were also a topic raised by residents, although less often than noise in general.

**Table 5.5: Policy issues raised by respondent group**

The Government should clarify or strengthen policy on noise (including metrics)	Raised 97 times 62% of instances were from the residents. 22% were from government bodies (i.e. local authorities or parish councils). It was also raised by representative organisations in nine instances.
The Government should clarify or strengthen policy on other issues (excluding noise)	Raised 55 times 44% were raised by the commercial aviation industry. Residents and representative organisations also made policy suggestions.
Policy needed to enforce airspace issues	Raised 44 times 39% were raised by the commercial aviation industry. Residents and the General Aviation community also raised this policy concern.
Comments specific to the Government's policy that a third runway should be built at Heathrow	Raised 13 times Just under half of these were from the commercial aviation industry.

- 5.70 A resident affected by aviation commented: *"Rather than just say "better managing noise" there should be an over riding objective to reduce the impact of noise on the majority of communities".* Another resident called for *"the policy of no night flights."*
- 5.71 There were also a small number of instances where limits, thresholds or measurements were raised, for example London Borough of Hounslow commented: *"there is a dire lack of practical and specific threshold limits associated with terms such as LOAEL, LOAEL and SOAEL stated within the Noise Policy Statement for England (NPSE), which renders this guidance fundamentally futile and flawed".*
- 5.72 A councillor commented: *"Government has made no meaningful attempt to address the correct mechanisms for modelling noise, taking into account a variety of appropriate noise metrics – such as N60 and N70 – thus addressing number of aircraft overhead".*
- 5.73 Representatives of the commercial aviation industry were more likely to suggest or raise other policy issues than noise, for example how we align ourselves internationally following the UK's exit from the EU. Several respondents suggested that the strategy should be updated as the Government updates its Aviation Strategy, and therefore the timing was not ideal.
- 5.74 Some respondents called for policy on the relative importance of different strategic drivers for airspace. For example, the Royal Aeronautical Society commented that: *"more detail is required from the Strategy to explain how competing strategic objectives and interests will be prioritised to enable local change promoters to progress unpopular but necessary schemes, as well as*

*managing the expectations of local communities, in order to achieved timely modernisation in the national interest. This may require the DfT to provide clearer guidance. Defence and security requirements and other standards that are backed by the force of international requirements, such as climate change, should be prioritised accordingly.”*

- 5.75 In terms of policies to enforce airspace issues, the British Microlight Aircraft Association commented on the need for an enforceable review of airspace use: *“if left to industry airspace changes will only be proposed where directly advantageous to the sponsor with no incentive to release underused and redundant airspace. The governance structure must have the power to enforce changes for the wider good without waiting for a sponsor.”*
- 5.76 Conclusions:
- the CAA does not set public policy, which is a matter for Government
  - once further Government policies emerge, for example through the forthcoming Aviation Strategy or the terms of the UK’s exit from the EU, the CAA will update the Airspace Modernisation Strategy accordingly.

## Concern and dissatisfaction

- 5.77 The group of residents who responded with identical or very similar language (discussed above) and many other residents, mostly disagreed with the balance between commercial growth and noise. Many of them suggested that Government policy on noise should be changed and that CAA should take a different stance on noise than that set out in current policy, as discussed in the section above.
- 5.78 There was also a strong correlation with residents feeling dissatisfied or ignored, and uncomfortable. This sentiment was raised 480 times of which residents accounted for 92% (439).
- 5.79 Some residents also took the opportunity to raise specific airspace change or airspace change process issues. These were raised 68 times of which 24 were from residents. One resident commented: *“huge loss of trust with Gatwick in recent years by introducing concentration then denying it had happened”*.
- 5.80 There were also 17 instances (out of 24 in total) where residents felt that the draft strategy was too complex to understand.
- 5.81 Conclusions:
- we note the dissatisfaction and will continue to make every effort to communicate with all stakeholders interested in the strategy, and continue to be transparent about our work and decisions.

## Chapter 6

## Next steps

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- 6.1 The Department for Transport has tasked the CAA with preparing and maintaining a co-ordinated strategy and plan for the use of UK airspace for air navigation up to 2040, including for the modernisation of the use of such airspace.
- 6.2 Although there was no requirement for us to invite responses on the draft document, we were pleased to have been able to provide this opportunity to stakeholders as part of our desire to be transparent and to listen to all views.
- 6.3 Some of the feedback received related to areas that we could not materially change in the strategy, for example relating to existing government policy or a dissatisfaction with the CAA or the aviation industry in general.
- 6.4 However the following areas, which attracted the most attention, have been updated:
- the CAA and Department for Transport have redrafted the joint objective for airspace modernisation
  - the Airspace Modernisation Strategy includes new sections and a supporting annex on the governance structure with more detail on the CAA and Department for Transport's role as co-sponsors, the Delivery Monitoring and Oversight (DMO) function and clarification of the governance architecture
  - the initiatives have been expanded to ensure air traffic management improvements have been captured, and a number of clarifications have been made in response to specific feedback
  - the requirements for a design masterplan have been modified and stated in more detail.
- 6.5 The updated Airspace Modernisation Strategy is now being published as required by the Secretary of State by the end of 2018.
- 6.6 The CAA will review the Airspace Modernisation Strategy regularly in order to report to the Secretary of State annually on its delivery.
- 6.7 Once further Government policies emerge, for example through the forthcoming Aviation Strategy or the terms of the UK's exit from the EU, the CAA will update the Airspace Modernisation Strategy accordingly.
- 6.8 The Airspace Modernisation Strategy will be updated in the future to reflect policy on drones and once the CAA has undertaken work to consider the economic and financial models that will be used to deliver the services required by new types of airspace users.
- 6.9 The CAA will consult interested parties early in 2019 on a high-level strategy for electronic conspicuity, including the mechanisms for achieving it, before making a

decision later in 2019 on its formal adoption. The Airspace Modernisation Strategy will be updated in the future to include the outcomes.

- 6.10 And finally, the CAA is also looking to increase its resourcing on airspace and will continue to set this out in relevant charges consultations.

## Appendix A

## Themes used to assess free-text responses qualitatively

Comment on the <b>Airspace Change Process</b> , or a specific airspace change proposal
The document does not use plain English or the document is <b>too complex</b>
Too much focus on <b>commercial growth</b> – over noise
Too much focus on <b>commercial growth</b> – over other airspace users (including wider comments on better recognition of GA)
Trade-off between <b>commercial growth</b> and other priorities: respondent does not disagree but urges careful handling.
<b>Health</b> issues resulting from noise should be given greater prominence
Government <b>policy</b> is needed to enforce airspace issues (including forcing action to be taken and/or reviews and remedies)
Government <b>policy</b> issues (other than noise) should be clarified / strengthened
Government should clarify/strengthen <b>policy</b> on noise (including suggestions for new or different metrics)
Comments specific to the Government's <b>policy</b> that there should be a new runway at Heathrow
<b>Safety</b> is compromised including over-complex airspace design
There is a need to consider new and/or future <b>technologies</b> more and how they affect the design, management or use of airspace
Too much focus on <b>military</b> access over other airspace users
More information needed on <b>electronic conspicuity</b>
Concern over <b>funding</b> eg. that CAA/Government should help
Concern over how the initiatives will be <b>resourced</b> eg staff/skills shortage
Communities or ICCAN should be more involved in <b>governance</b> structure
General Aviation should be more involved in <b>governance</b> structure
Industry should be more involved at the top of the <b>governance</b> structure
The Government and/or CAA should use the <b>governance</b> structure to hold industry more to account
NATS has a <b>vested interest</b> and/or not impartial enough
Other industry body has a <b>vested interest</b> and/or not impartial enough
<b>Respondent uncomfortable</b> with the strategy, feels ignored
<b>Respondent dissatisfied</b> (distrust, thinks incompetent, thinks captured etc) with CAA
<b>Respondent dissatisfied</b> (distrust, thinks incompetent etc) with industry body