

Committee: Stansted Airport Advisory Panel

Agenda Item

Date: 11th May 2017

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Title: UK Airspace Policy; Public consultation by the Department for Transport (DfT)

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Report for decision

Summary

1. This report is about the current DfT consultation on UK Airspace Policy. The report summarises the main parts of the consultation document and suggests how the Council should respond to the consultation.

Recommendation

2. That the Panel considers the response to the consultation that is set out in this report and suggests any extra points or amendments that it thinks are appropriate. The Council's final response will be sent to the DfT by officers via the consultation portal by the closure date.

Financial Implications

3. None.

Background Papers

4. None.

Impact

- 5.

Communication/Consultation	<p>The consultation runs from 2nd February to 25th May 2017. The DfT hosted 13 regional events in March and April. Officers attended a regional event on 20th April.</p> <p>A 90-page document entitled "UK Airspace Policy: A framework for balanced decisions on the design and use of airspace" has</p>
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	<p>been published alongside an executive summary. Other accompanying documents have also been published, including a strategic rationale for making airspace change, draft air navigation guidance to the CAA on its environmental objectives and the CAA's Survey of Noise Attitudes (SoNA).</p> <p>The questions that the DfT would like consultees to answer are set out at the end of this report, along with the suggested responses in bullet point format.</p> <p>A copy of the executive summary is attached to this report.</p> <p>The CAA is currently consulting on its draft airspace design guidance. The consultation runs from 31st March – 30th June 2017.</p>
Community Safety	To be considered by the DfT.
Equalities	To be considered by the DfT.
Health and Safety	To be considered by the DfT.
Human Rights/Legal Implications	To be considered by the DfT.
Sustainability	To be considered by the DfT.
Ward-specific impacts	Areas of the district that are overflowed by departing and arriving aircraft at Stansted Airport.
Workforce/Workplace	Officer and Member time in preparing and considering this report.

Situation

THE REASONING BEHIND THE UK AIRSPACE POLICY CONSULTATION

6. The DfT is seeking views on an update to UK airspace policy in order to support the modernisation of airspace by maximising the economic and social benefits of aviation, and also to minimise its negative local impacts. Thinking

behind the updating of policy was developed via focus groups which the DfT facilitated in 2016 under Chatham House Rules. The District Council was involved in those groups both as a stakeholder and representing SASIG. In the executive summary of its strategic rationale for airspace change the DfT states that:

“The UK’s aviation industry has expanded enormously since the 1950s and 1960s when much of our airspace structure was first designed. Since then airspace has been added to and adapted in response to growing traffic levels, but many departure routes, for example at our major airports have been little changed for many years, even several decades. This piecemeal approach to the development of our airspace structure has created several issues with today’s airspace that limit the ability to add capacity without making some more fundamental changes.

Today’s upper airspace is structured around a fixed network of way points that are based on the position of ground navigation beacons and create bottlenecks. The busy terminal airspace that serves multiple airports, often closely located, has become a complex web of intersecting flight paths that require a wholesale redesign to increase capacity and allow aircraft to climb and descend continuously. Airspace at lower altitudes around individual airports is also constrained by the reliance on ground navigation. Airports’ standard arrival and departure routes need to be upgraded using satellite navigation to add capacity and introduce the flexibility to better manage noise impacts”.

7. The DfT identifies five major benefits from airspace modernisation. These are i) increased capacity, ii) reduced delays, iii) reduced emissions and fuel consumption, iv) reduced noise from overflying, and v) aviation safety enhancements. The proposals would apply to the whole of the UK.

8. Particularly, the DfT is seeking views on
 - the role of an Independent Commission on Civil Aviation Noise (ICCAN) to ensure noise impacts are openly considered;
 - guidance on how noise impacts on people should be assessed and used to inform decisions on airspace options;
 - bringing compensation policy for airspace changes in line with policy on changes to aviation infrastructure, and
 - greater flexibility for London’s major airports, so they can adapt noise management to the needs of their local communities.

9. The updated policy would replace part of Chapter 3 of the 2013 Aviation Policy Framework (noise and other local environmental impacts) which remains in force for the time being. The APF replaced the 2003 Air Transport White Paper, which was the previous Labour Government’s policy backing for a second runway at Stansted which was subsequently withdrawn by the

Coalition.

10. On 26th January, the Transport Select Committee launched an inquiry into the airspace management and modernisation and took written evidence from over 30 organisations and individuals. Submissions are no longer being accepted and the Committee ceased to exist following the dissolution of Parliament on May 3rd.

THE UK AIRSPACE CONSULTATION

11. The consultation document is divided into six main themes. All these themes have significance for this district and its neighbours. The themes are:

- Changes to Airspace
- Compensation in Airspace Change
- Making Transparent Airspace Change Decisions
- Assessing Aviation Noise
- Independent Commission on Civil Aviation Noise
- Ongoing Noise Management

Changes to Airspace

12. Three tiers of airspace change are proposed.

13. *Tier 1* changes relate to changes to the permanent structure of UK airspace, and are governed by the CAA's formal airspace change process which is currently undergoing review. The Council previously commented on this process in May of last year. It is proposed that the Secretary of State is given discretionary powers to "call in" a Tier 1 change application, but only for changes deemed to be of national importance. This is because the CAA is considered to be best placed to make airspace decisions in most cases. Any party will be able to request call-in in the first 28 days after the proposal has been submitted to the CAA. The proposed call-in criteria would be:

- *the change is considered to be of strategic national importance and was not linked to a planning decision which had already been determined by the Secretary of State, or*
- *the proposal could have a significant impact (positive or negative) on UK economic growth, or*
- *it could lead to a change in noise distribution resulting in a 10,000 net increase in the number of people subjected to a noise level of at least 54dB LAeq 16hr as well as having an identified adverse impact on health and quality of life.*

14. Tier 2 changes are changes to air traffic control procedures, such as vectoring, which do not change the UK's airspace structure but which result in a permanent and planned redistribution (PPR) of air traffic. Currently, these changes can be implemented without any need to consult, even when the noise impact might be similar to a Tier 1 change. This has caused confusion for local residents. A proportionate change process for Tier 2 would:

- i) ensure that local communities are better informed;*
- ii) increase CAA oversight of changes that redistribute aircraft tracks and noise impact;*
- iii) ensure that the needs of communities affected by aircraft noise are balanced against the needs of industry and passengers; and*
- iv) remove the anomaly in engagement levels with Tier 1*

15. The Government will direct the CAA to devise a proportionate policy and process related to dealing with Tier 2 changes where a PPR creates a certain level of noise impact below 7,000ft. However, it is not doing so at the moment pending the outcome of the current airspace policy consultation.

16. Tier 3 changes are those which occur over a period of time due to such factors as the weather, changing flight destinations and different aircraft being used. The consultation is proposing that the CAA puts in place a suitable light touch process for industry to follow. This could include regular updating of community groups, the provision of flight tracking information or historic data on changing weather patterns.

17. The Secretary of State's call-in powers for Tier 1 changes are welcomed, although the requirement for a 10,000 net increase means it is highly unlikely that any proposal for airspace change at Stansted would qualify under that criterion. As an illustration, the most recent modelling work undertaken by the CAA for noise exposure contours at Stansted (for 2015) – although only modelling down to 57dB LAeq 16hr – gives a population of 1,650 within that particular contour. It seems logical to introduce a Tier 2 change procedure where residents may experience similar noise effects to a Tier 1 change, but at the moment there are no details of the procedure. If effects are to be significant, the Council expects the procedure to reflect the Tier 1 procedure in terms of its proportionality. In relation to Tier 3 changes, ICCAN could, as part of its remit, be responsible for vetting industry practice in real life.

Compensation

18. The consultation admits that there is a discrepancy between the treatment of noise impacts associated with use of new airport infrastructure (where compensation is payable, albeit subject to a completion of development trigger point) and noise from airspace changes where no statutory compensation rights or Government policy exists. The consultation proposes four changes;

i) change the policy wording so compensation is payable regardless of the type of change – this is entirely fair.

ii) change the policy wording to allow for financial assistance towards insulation within the 63dB LAeq level or above to be applicable without the requirement for a 3dB minimum uplift to have taken place – this is also fair as it treats everyone experiencing the same level of noise in the same manner.

iii) encourage an airspace change promoter to consider compensation for significantly increased overflight – this is to be supported and could be applicable, for instance, where a concentrated route is considered the best way to meet current Government noise objectives to limit and where possible reduce the number of people significantly affected by aircraft noise. This could relate to either a Tier 1 or Tier 2 change, and could be informed by the use of N-above contours or other overflight metrics.

iv) a requirement to offer a resident within the 69dB LAeq or higher contour an offer of full insulation to be paid for by the airport where that resident does not want to move – this is welcomed as an option to moving, although at Stansted the latest CAA modelling work indicates that no-one lives within the 69dB contour. Airports are not precluded from currently making this offer, but current policy is that the minimum that is required is assistance with insulation costs. This requirement could assist in retaining community cohesion rather than, say, letting vacant homes on a short term basis.

Making Transparent Airspace Decisions

19. The consultation admits that it has not always been easy for those not directly involved in the airspace change process to see how decisions have been arrived at. The CAA's revised airspace change process will assist, but there is still a need for;

i) greater clarity on the Government's approach to whether single or multiple routes are better: and

ii) a clear framework that allows the pros and cons of different options for route design to be compared against one another.

20. The consultation proposes that options analysis is used, as this is considered to be best practice in decision making. Whilst options analysis may already take place, discounted options may not always be presented as part of a consultation and hence the reason or reasons for discounting them may not be clear. Options analysis could assist on deciding whether single or multiple routes are appropriate in each case. A single route may expose fewer people to aircraft noise and bring about the highest level of certainty, but they may experience higher levels of noise with increased health effects. Options analysis will be a method of weighing up the costs and benefits of single and

multiple routes.

21. Options analysis should be carried out as part of the airspace change process. It should include a robust assessment of noise impacts, with community engagement being an integral part of the process both at the design and consultation stages. Options analysis should also include impacts on carbon and air quality, safety (the CAA's primary consideration), efficiency and impacts on other airspace users.
22. Airspace decisions will need to be made in accordance with the Government's altitude based priorities. These priorities state that up to 4,000ft, mitigation of noise is the primary consideration and above 7,000ft it is reducing carbon emissions. Between 4,000 -7,000ft there will need to be a trade-off based on the circumstances of each case, which options analysis will help to explain. The DfT also proposes that the CAA publishes an environmental statement with each of its airspace change decisions to further improve transparency.

Assessing Aviation Noise

23. The Government's overall policy on aviation noise is *"to limit and, where possible, reduce the number of people in the UK significantly affected by aircraft noise as part of a policy of sharing benefits of noise reduction with industry"*. The DfT accepts in its analysis that "sharing benefits" and "significantly affected" are not clearly defined terms, and that "sharing benefits of noise reduction with industry" means sharing between industry and communities in support of sustainable development. The DfT also acknowledges that using the 57dB LAeq contour as marking the onset of significant community annoyance is a dated concept that does not take into account latest research (such as the SoNA study).
24. The consultation proposes that overall policy on aviation noise should be interpreted as meaning the number of people experiencing adverse effects as a result of aviation noise should be limited and, where possible, reduced. Adverse effects are those related to health and quality of life, and would be determined using a risk based approach to noise assessment using the Lowest Observed Adverse Effect Level (LOAEL) as per the Noise Policy Statement for England. This is the point at which adverse effects begin to be seen on a community basis. LOAEL would be defined as 51dB LAeq 16hr for daytime noise (consistent with the findings of SoNA) and 45dB Lnight for night noise.
25. To take account of people who may be significantly affected by aviation noise at levels that do not exceed the LOAEL, guidance will be offered on metrics which can be used to assess the frequency of noise events. One will be the CAA's recently published definition of overflight (CAP 1498), although the

Government has yet to set firm angle and altitude thresholds criteria. Another will be N-above contours.

26. Whilst the extra analysis is to be welcomed, the consultation is not proposing any policy on when airspace change should be ruled out on noise grounds, or any national or local targets for noise reduction. Also, it is questioned whether metrics that average out effects over a year accurately represent areas where overflying is infrequent but intense when it does occur. It is worth re-emphasising the Government's overall policy to "limit and where possible reduce" which does not imply that a reduction will occur. The use of less noisy aircraft, better airspace design and improvements in navigational technology should result in reduced noise footprints, but this may only be marginal if the number of air traffic movements increase. Decisions on the use of single or multiple paths will be important.

Independent Commission on Civil Aviation Noise

27. The concept of a body like this emerged from the work of the Airports Commission, which concluded that trust between communities and airports can easily be lost. There are currently no terms of reference for ICCAN, but it is not proposed that it would act as a lobby group or to oppose changes. Rather, ICCAN would act to ensure that there is effective communication between industry and communities in order to reach balanced decisions and to provide expertise on noise management. There would be a future review of ICCAN's functions to see if it is still needed, or if its terms of reference should indeed be expanded. The Government's preferred option is to set ICCAN up as an independent body attached to the CAA, but publicly funded and not funded by industry. This should ensure its credibility.
28. Paragraph 14 of the executive summary suggests functions for ICCAN. Essentially its roles would focus on research and quality assurance, but there is a suggestion that it could advise on planning decisions and ongoing noise management. The author discussed this potential role with DfT staff at the regional stakeholder event. ICCAN could act as a consultee on planning applications where aviation noise is an issue, but it would only advise on whether environmental statements submitted by applicants followed latest best practice. ICCAN would not be recommending whether planning permission should be granted or refused. ICCAN could give advice on the wording of appropriate planning conditions or obligations. The aviation industry has become increasingly concerned at the lack of a replacement for PPG24 (Planning and Noise), and ICCAN could perhaps take a lead role in this.
29. An issue faced by this District as the local planning authority is that there is no "go to" body should it have a query over public safety zones. Attempts in the past to direct questions to either the CAA or DfT (such as when planning applications straddle zone boundaries) have been unsuccessful. This difficulty

has been recognised by SASIG as well. The author suggested to DfT staff that there might be case in the future to expand ICCAN's role into safeguarding if it was felt that there was a need to build up or consolidate expertise on this subject.

30. There is a concern about how quickly ICCAN could be up and running. The DfT is aware of this concern, and this is one of the reasons why it is suggesting that ICCAN is established as an independent body attached to the CAA. Other governance arrangements would be lengthier to set up.

Ongoing Noise Management

31. There is a common framework for noise management, which is the International Civil Aviation Organisation's "Balanced Approach". The approach requires a noise problem to be addressed in the most cost effective way and identifies four pillars for managing noise; reduction of noise at source, land-use planning, operating procedures and finally operating restrictions – which should only be applied if no other measure would be feasible. The first two, however, may not always be effective and are largely beyond an airport's control.
32. A new EU regulation came into force last year which requires a competent authority to be appointed to oversee decisions on noise-related operating restrictions at major airports, including Stansted. The competent authority must be independent of any organisation which could be affected by noise or the restriction. Airports therefore cannot carry out this role.
33. Since 1971, Stansted has been a designated airport for noise control purposes (along with Heathrow and Gatwick). This means that the Government sets the night flights regime, noise preferential routes and other operational procedures such as departure noise limits. The Government acknowledges that a degree of procedural inertia has resulted, which means that the controls it sets might not be as effective as those set at non-designated airports.
34. The Government believes that the most effective way for operating restrictions to be considered is to align decisions with land-use planning when airport development takes place. This is because a full environmental assessment is required as part of the planning application process, but there may be instances where operating restrictions are required separately, such as following the publication of a noise action plan. In future, the Government would like to determine its involvement according to the significance of the decision rather than the airport in question.

35. In the case of planning applications for airport development, the Government proposes that that the local authority would be the competent authority for planning related operating restrictions. The exception would be Nationally Significant Infrastructure Projects (such as a new runway or expansion adding more than an extra 10mppa), or planning applications that have been called-in by the Secretary of State for determination or appealed. In these cases, the Secretary of State would be the competent authority. Paragraph 7.29 of the consultation document states:

“Stansted also expects to be bringing forward a planning application later this year to seek an increase in the level of its planning cap so that it can make maximum use of the capacity provided by the existing runway. This would provide an opportunity for local consideration of the future conditions on night flights, as well as other noise controls”.

36. For operating restrictions brought forward outside the planning process, the Government proposes that the CAA would be the competent authority.

37. The Government proposes that the noise controls that it currently sets at the designated airports (such as departure noise limits, continuous descent approaches and noise preferential routes) are transferred to those airports as is already the case with non-designated airports. Local decisions could be informed by ICCAN best practice in the future.

38. The Government is also proposing that it requires the designated airports to publish data on their departure routes and track keeping performance to provide greater transparency and so that changes over time can be more easily understood. The information that is published should be determined by the airports in consultation with local communities.

Risk Analysis

39.

Risk	Likelihood	Impact	Mitigating actions
The Council's views are not taken into account.	1. The Council will be responding to the consultation.	2. Future UK airspace policy will have an impact on those residents who are overflowed, or who may be overflowed in	Respond to the consultation.

		the future.	
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- 1 = Little or no risk or impact
- 2 = Some risk or impact – action may be necessary.
- 3 = Significant risk or impact – action required
- 4 = Near certainty of risk occurring, catastrophic effect or failure of project.

UK AIRSPACE POLICY CONSULTATION

Summary of consultation questions

Questions on Chapter 4: Changes to Airspace

Q1a; Please provide your views on the proposed call-in function for the Secretary of State in tier 1 airspace changes and the process which is proposed, including the criteria for the call-in and the details provided in the draft Air Navigation Guidance.

- The call-in function is welcomed, although outside of Nationally Significant Infrastructure Projects the Council wonders on how many occasions it would actually be used.
- The 28-day deadline after submission may not be sufficient time for local communities to appreciate the full implications of the change proposal. This means that there would be no opportunity to request call-in even in contentious cases where, under the CAA's revised airspace change process, it may publish a draft decision letter.

Q1b; Please provide your views on the proposal that Tier 2 airspace changes should be subject to a suitable change process overseen by the Civil Aviation Authority, including the Draft Air Navigation Guidance and any evidence on costs and benefits.

- This is welcomed in principle, but there are no details of the process that would be followed. As the consultation document acknowledges that Tier 2 changes can, in certain instances, bring about similar environmental effects to Tier 1 changes, the process should be necessarily proportionate. As the CAA's revised airspace change process for Tier 1 changes already allows for proportionality, it may be that it could simply be adopted for Tier 2 changes as well.

Q1c; Please tell us your views on the proposal that Tier 3 airspace changes should be subject to a suitable policy on transparency, engagement and consideration of mitigations as set out by the Civil Aviation Authority.

- This is supported. The draft Air Navigation Guidance makes it clear that the policy which the CAA establishes should be that local communities are kept informed of relevant changes which are likely to lead to a noticeable change in impacts, where practicable, and that suitable mitigations are considered. It is considered that ICCAN could be given a responsibility to periodically audit an airport's procedures and report its findings to the consultative committee and / or a statutory committee of the local council.

Q1d; Please tell us your views on the airspace change compensation proposals.

- These are supported because they bring about more fairness to the system. It is critical that compensation is payable when the effects occur, and that there is no delay built into the legislative procedure.

Questions on Chapter 5: Making Transparent Airspace Decisions

Q2a; Please provide your views on the proposals to require options analysis in airspace change processes as appropriate, including details provided in the Draft Air Navigation Guidance.

- Options analysis will be a useful tool, but the end result must include all discounted options and there must also be an audit trail of evidence and analysis that leads to the chosen option or option(s). Options analysis is of necessity complicated, so there must always be a clear to read summary.
- Much as local planning authorities are required to balance the three strands of sustainable development in making planning decisions (economic, social and environmental), the same principle should apply to options analysis.

Q2b; Please provide your views on the proposal for assessing the impacts of noise, including on health and quality of life. Please provide any comments on the proposed metrics and process, including details provided in the Draft Air Navigation Guidance.

- The Council welcomes the acknowledgement that use of the 57dB LAeq contour as representing the onset of significant community annoyance is outdated, although continued use of the contour as part of noise analysis should continue for benchmarking purposes. It is clear from the Air Navigation Guidance that assessment should be geared towards the Government's altitude based priorities, using a risk-based approach that captures the lowest level of observable effects. The Council agrees that the use of metrics such as the number of overflights and N – above contours is appropriate for analysing the effects of noise further from airports. This is particularly so at altitudes between 4,000 – 7,000ft where increased concentration can result

from airspace modernisation. There seems to be an obvious role for ICCAN in carrying out unique research and compiling a compendium of other relevant research that can inform the use of future metrics.

- There is no straightforward answer to whether single or multiple routes are appropriate – in each case the answer will need to emerge from options analysis and local consultation.
- Whilst the extra analysis is to be welcomed, the consultation is not proposing any policy on when airspace change should be ruled out on noise grounds, or any national or local targets for noise reduction. Also, it is questioned whether metrics that average out effects over a year accurately represent areas where overflying is infrequent but intense when it does occur. It is worth re-emphasising the Government's overall policy to "limit and where possible reduce" which does not imply that a reduction will occur. The use of less noisy aircraft, better airspace design and improvements in navigational technology should result in reduced noise footprints, but this may only be marginal if the number of air traffic movements increase. Decisions on the use of single or multiple paths will be important.

Questions on Chapter 6; Independent Commission on Civil Aviation Noise

Q3a; Please provide your views on the Independent Commission on Civil Aviation Noise's proposed functions.

- It is disappointing that ICCAN has been downgraded from the Independent Aviation Noise Authority (IANA) recommended by the Airports Commission in its final report. IANA would have had advisory, consultative and research roles, with powers to mediate in disputes over noise monitoring and to intervene where due process has been breached. ICCAN does not have any formal intervention powers or powers to make binding recommendations. Its effectiveness may be limited.
- ICCAN's help with quality-checking the noise sections of environmental statements submitted with planning applications is welcomed, as would be help with wording planning conditions and obligations. Its help with setting up governance procedures to negotiate night flight restrictions would also be helpful. If local authorities are to become the competent authority for planning related restrictions, there are likely to be resource and technical expertise issues.
- The aviation industry has become increasingly concerned at the lack of a replacement for PPG24 (Planning and Noise). ICCAN could, perhaps, take a lead in this working in conjunction with bodies representing the industry and local communities.

- A review of ICCAN's role and responsibilities should be carried out after 5 years as suggested in the consultation. A part of this review should be whether ICCAN's role could be usefully expanded. An issue faced by this District as the local planning authority is that there is no "go to" body should it have a query over public safety zones. Attempts in the past to direct questions to either the CAA or DfT (such as when planning applications straddle zone boundaries) have been unsuccessful. This difficulty has been recognised by SASIG as well. It is suggested that there might be case in the future to expand ICCAN's role into safeguarding if it was felt that there was a need to build up or consolidate expertise on this subject. Whilst safeguarding is a different discipline to air noise, there seems to be no reason why ICCAN as it becomes more practised could not look at taking on a proportionate advisory role.

Q3b; Please provide your views on the analysis and options for the structure and governance of ICCAN given in Chapter 6, and the lead option that the Government has set out to ensure ICCAN's credibility.

- The key issue is there is confidence in ICCAN as an independent body. In this respect, a publicly funded organisation attached to an existing non-governmental body does seem appropriate. Cost recovery has been raised, but if this was from the industry there would inevitably be questions as to whether ICCAN could remain truly independent. A 5-year review should give ICCAN enough time to establish whether it is value for money.

Questions on Chapter 7: Ongoing Noise Management

Q4a; Please provide your views on the proposal that the competent authority to assure application of the balanced approach to the adoption of operating restrictions as airports in England should be as set out in Chapter 7 on Ongoing Noise Management and further information at Annex F.

- When determining airport expansion applications in the past, the Council has, as the local planning authority, imposed planning conditions and negotiated obligations that limit environmental impacts to those set out in the accompanying environmental statements. These have included caps on movements and noise envelopes. Designating the Council as the competent authority is viewed as an extension to this role, not a new one.
- The National Planning Policy Framework identifies three strands to sustainable development – economic, social and environmental. As the local planning authority, the Council already has the duty to balance these considerations when determining a planning application, so the draft UK Airspace Policy isn't really imposing a new requirement. The Council would need to look very carefully at governance arrangements for negotiating restrictions that cross economic, social and environmental barriers (such as a

new night flights regime), and the help of ICCAN in setting up a suitable structure and providing quality assurance could prove to be very useful.

Q4b; Please provide your views on the proposal that responsibility for noise controls (other than noise-related operating restrictions) at the designated airports should be as set out in Chapter 7 on Ongoing Noise Management.

- Agreed, so long as these arrangements comply with the relevant EU regulation regarding no self-interest.

Q4c; Please provide your views on the proposal that designated airports should publish details of aircraft tracks and performance. Please include any comments on the kind of information to be published and any evidence on the costs or benefits.

- They should. Stansted Airport, in conjunction with the CAA, publishes four-day sample track data from the summer period each year for arrivals on Runways 22 and 04 and for departures on the same. The information is colour coded for height and includes NPR swathes and average daily departure and arrival details for each route. Although the data does not include information on individual aircraft types it is highly visual and relatively easy to explain to the public.
- Airports should also publish details of track-keeping accuracy for all departure routes, including by aircraft type and airline.

Q4d; Please provide your views on whether industry is sufficiently incentivised to adopt current best practice in noise management, taking into account Chapter 7 on Ongoing Noise Management, and the role of the Independent Commission on Civil Aviation Noise in driving up standards in noise management across the aviation sector.

- Industry will act if there is a business case to do so, so the “sticks and carrots” need to be in place. ICCAN can inform and advise, but doesn’t seem to have any real teeth.

Questions on the Draft Air Navigation Guidance

Q5; Please provide any comments on the Draft Air navigation Guidance published alongside this consultation.

- No further comments to those included with the answers to the other questions.