

**Air navigation guidance for the Civil Aviation Authority**

**ANC RESPONSES TO CONSULTATION QUESTIONS  
(ANC/CAA/ANG)**

**Q1. Do you agree that 4,000 feet is a reasonable altitude below which can be considered “in the immediate vicinity” of the airport?**

No- we suggest that if the metric is to relate to noise impact, adoption of an arbitrary height, e.g. 4,000 ft, cannot be technically valid for all U.K Airports. For those who accommodate large long haul aircraft the noise on the ground will be materially different to an airport using twin-engined turboprop aircraft for the same altitudes, e.g. 4,000 ft.

**Q2. Do you think the altitude-based priorities will provide the necessary clarity for those proposing airspace changes?**

Yes- If in selecting the altitude priorities the type of traffic is taken into account, e.g. Long Haul (7,000 ft), Medium Haul (5,000ft), and Short Haul turboprops (3,000ft).

**Q3. Do paragraphs 5.1 to 5.9 represent a reasonable understanding of the current and future use of NPRs?**

Yes.

**Q4. Should the CAA consider any other factors when dealing with airspace change proposals involving NPRs (paragraph 5.10)?**

Yes. The CAA should consider the Aviation Policy Framework (APF) policy objective, paragraph 3.12, “to limit, and, where possible, reduce the number of people in the U.K. significantly affected by aircraft noise.”

**Q5 Is the process for approving SIDs using PBN at designated airports appropriate and proportionate?**

No, as above the CAA should take into account APF policy, paragraph 3.12.

**Q6. Is this process for changing NPR at the designated airports reasonable?**

Yes.

**Q7. Should the Secretary of State continue to have an approval role, as envisaged in the guidance, or should the CAA have a greater role?**

The Secretary of State should continue to have an approval role as the CAA is an unelected body with no political status, and so cannot make consensus decisions.

**Q8. Should consideration of respite be encouraged more?**

Yes.

**Q9. Given the difficulties in balancing the Government's policy on minimising over-flight of populated areas with protecting National Parks and AONB, does the guidance reflect a pragmatic and practical way forward for the CAA?**

Yes.

**Q10. Does the consultation process as outlined in Chapter 9 of the guidance ensure airspace change consultations remain proportionate and appropriate?**

Yes.

**Q11. Is the balance of the guidance appropriate? Are there any areas of the guidance you think need clarifying?**

Yes- The consultation should require CAA to not only "be familiar with", but to take fully into account the APF and subsequently the revised version in 2015, as well as the National Planning Policy Framework (NPPF), Noise Policy Statement for England (NPSE), etc.

**Q12. Can you provide any evidence of the costs or benefits this guidance may have for your organisation?**

No, not applicable to us a trade association.

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