



House of Commons
Transport Committee

**The use of airspace:
Government response
to the Committee's
Fifth Report of Session
2008–09**

**Fifth Special Report of Session
2008–09**

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The Transport Committee

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The current staff of the Committee are Annette Toft (Clerk), Adrian Jenner (Second Clerk), David Davies (Committee Specialist), Marek Kubala (Inquiry Manager), Alison Mara (Senior Committee Assistant), Jacqueline Cooksey (Committee Assistant), Stewart McIlvenna (Committee Support Assistant) and Hannah Pearce (Media Officer).

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Fifth Special Report

The Committee published its Fifth Report of Session 2008–09, *The use of airspace*, on 10 July 2009. The response from the Department for Transport was received in the form of a memorandum dated 28 September 2009, and is published as an Appendix to this report.

Appendix – Department for Transport response

Introduction

1. This paper sets out the Government response to the Committee's Inquiry Report into The Use of Airspace, published on 10 July 2009.
2. The Government welcomes the Committee's interest in this subject and, in particular, its recognition that there is much to commend in the current management of UK airspace.
3. This response incorporates contributions provided by the Civil Aviation Authority (CAA). In each case the Committee's recommendation is reproduced followed by the Government's response.

The management of airspace

Recommendation 1

4. Our evidence has demonstrated there is much to commend in the current management of UK airspace. We have been particularly impressed by the technical competence and professionalism of the CAA and NATS. We reject suggestions that responsibility for decision-making about airspace be placed in a different organisation. We see no apparent and significant benefits from such a transfer.

Government response

5. The Government welcomes the Committee's endorsement of the current decision-making arrangements for airspace in the UK.

Strategy, change and co-ordination in airspace management

Recommendation 2

6. It is fundamental that those affected by airspace changes are presented with more than one option, assuming this is possible, during the consultation process. The CAA must encourage airspace change sponsors to follow the guidance requirement for more than one option to be presented, if possible.

Government response

7. The CAA's existing Airspace Change Process guidance document (CAP 725) already encourages Airspace Change Proposal sponsors to consider and consult on more than one option, where this is feasible. The 'do nothing' scenario is always one of the options to be considered.

8. However, because CAP 725 covers all airspace changes from minor adjustments to large, wide-ranging changes, it necessarily recognises that in certain circumstances the complexity and interdependencies of an airspace design are such that multiple options are not feasible because the knock on effects of each option rapidly become unmanageable. For example, in the case of the London airspace that was the subject of the recent NATS Terminal Control North (TCN) consultation, a relatively minor change in one departure profile would have affected several other arrival or departure procedures. The CAA's Directorate of Airspace Policy (DAP) does, however, expect sponsors of airspace change proposals to set out clearly why a single option is being put forward for consultation, what other options were considered and why they were discarded.

9. In addition, sponsors of airspace changes are also strongly encouraged to engage with local authorities representing communities that might be affected by the change prior to the start of formal consultation. In this way, local factors can be given due regard at the earliest stage of the airspace design process.

Recommendation 3

10. The CAA and NATS should review the techniques used for designing controlled airspace around airports. The techniques used should match European and USA best practice standards to minimise the impact on general aviation, whilst ensuring safety and that current standards are not lowered.

Government response

11. In the UK, controlled airspace is designed in accordance with international requirements set out by the International Civil Aviation Organisation (ICAO). The size of a Control Zone around an airport is based on the requirement to contain Instrument Flight Procedures within Controlled Airspace so as to provide a known traffic environment and to protect commercial air transport movements during the critical phases of flight associated with take-off and landing. The overall size and volume of the airspace is dictated by the actual approach and departure procedures for an airport and not solely by the number of aircraft operating within it. Importantly, controlled airspace is not intended to be a 'no-go' area for General Aviation traffic and the CAA is committed to ensuring appropriate access is provided by air traffic service providers when it is safe to do so.

12. Direct comparisons have been made between the size of the control zones at Glasgow, Doncaster and other airports, with that of Gatwick. However, those comparisons are not entirely appropriate as the procedures for Gatwick are primarily contained within the larger London Terminal Manoeuvring Area (LTMA), which sits above the control zones for Gatwick and the other London airports. Equally, a direct correlation with the USA is

not feasible as the operating environment is substantially different for a number of reasons including traffic and airport density, airspace classification and rules of the air.

13. Similarly, individual States within Europe operate in accordance with their own strategic priorities and policies. These vary greatly from country to country, although for the future, Single European Sky Implementing Rules may seek to harmonise how airspace is classified across Europe. The CAA will work closely with the European Commission and Eurocontrol to ensure that any such Implementing Rules continue to meet the requirements of UK operators as far as practicable.

Recommendation 4

14. There needs to be clarity about what benefits an Airspace Master Plan would bring, in particular how such a plan would improve flight efficiencies and improve the effectiveness of the Airspace Change Process.

Recommendation 5

15. When the current project definition stage has been completed, the CAA should present its framework recommendations for a Future Airspace Strategy (FAS) to the Department for Transport and the industry. This work should explain the nature of the FAS, the benefits to be achieved, how the strategy relates to airport development planning processes, and the impact of the strategy on the Airspace Change Process. It should describe the safeguards required to ensure that the FAS does not pre-empt the requirement for proper consultation on airspace change proposals.

Recommendation 6

16. The CAA could allay many concerns about the perceived slow progress in developing a long-term airspace strategy, and the lack of consultation to date on the FAS, through better communication with stakeholders. The CAA must improve its communication with key stakeholders about the ongoing work on the FAS and the likely timescales. It must ensure that stakeholders are properly consulted about the FAS when appropriate.

Government response

17. The CAA's Directorate of Airspace Policy is leading the complex work to develop a Future Airspace Strategy (FAS)—effectively an Airspace Master Plan—to address safety, environmental and capacity issues out to 2030 within the context of the Future of Air Transport White Paper and developing Government policy on climate change and sustainable development. This work, which started in earnest in 2008, has to dovetail with new requirements emanating from the Single European Sky second legislative package and global technology developments from the Single European Sky Air Traffic Management (ATM) Research (SESAR) programme and the USA's Next Generation Air Transport System (NextGen).

18. The CAA has been working with DfT, MOD and NATS to develop the FAS but fully acknowledges the need to involve other key stakeholders and that the lack of wider engagement on this topic to date, may have led to some stakeholder concerns. To address

this, the CAA is preparing a paper entitled, 'Airspace for Tomorrow' to initiate dialogue with stakeholders, setting out the broad vision, key drivers and strategic objectives for FAS and how it will be developed. The CAA intends asking the National Air Traffic Management Advisory Committee (NATMAC) – which includes a range of stakeholders – to formally consider the paper at its meeting in October, with a view to circulating it shortly thereafter. Formal consultation on the strategy will follow once the material within the various FAS work streams is sufficiently developed.

Recommendation 7

19. We believe that airspace impacts should be considered a vital part of airport development proposals. It is essential that National Policy Statements (NPSs) on the development of major airport infrastructure are based on advice from the CAA and NATS about the airspace implications of proposed developments. In the case of non-location specific NPSs, the NPS should include unambiguous guidelines to the IPC on how to evaluate the airspace implications of any proposal. It is vital that the industry is well appraised of the methods used as well as the factors and information used by the Commission in making decisions on major airport developments.

Government response

20. The Government recognises that major airport development cannot be considered in isolation from the associated impacts on airspace, and we will consult the CAA and NATS when developing a National Policy Statement (NPS) on Airports. Having regard to the Airports NPS, the Infrastructure Planning Commission's (IPC) decisions will, however, focus on the ground infrastructure aspects of proposals for nationally significant airport development. Airspace planning and regulatory decisions will remain the responsibility of the CAA under the Airspace Change Process.

21. As with the existing planning system, the Government expects applications for major airport development which are submitted to the IPC will set out illustrative options for airspace design. The subsequent detailed airspace design and consultation by the airspace change sponsor (who is usually the promoter of the development proposal) will depend on the nature of the airport development for which the IPC has granted consent, and it would therefore be taken forward only once consent had been granted.

22. With regard to NPSs generally, the CAA is a statutory consultee for any NPS which relates to airports or is likely to affect aviation activity. Statutory undertakers, including NATS, must also be consulted on any NPS which includes policies relevant to their functions. Other relevant secondary legislation implementing the Planning Act (2008) makes similar provisions.

23. The Government agrees that it is important that the industry fully understands the IPC decision-making process for major airport developments. The Planning Act clearly states that the IPC, in deciding an application for a nationally significant infrastructure project, must have regard to any relevant NPS, any local impact report, any other prescribed matters or any other matters which the IPC thinks are both important and relevant to its decision. All decisions must be made in accordance with any relevant NPS except to the extent that it would lead to the UK being in breach of its international obligations; be in

breach of any statutory duty that applies to the IPC; be unlawful; result in adverse impacts that outweighed the benefits; or be contrary to regulations about how its decisions are to be taken.

Recommendation 8

24. Some “stacking” may be inevitable. But excessive stacking, such as frequently occurs at Heathrow, has negative environmental effects. A third runway at Heathrow Airport, if built, offers a real opportunity to add resilience into the air traffic management system and to help reduce excessive stacking. If a third runway is built at Heathrow, the Government should create a framework for setting targets to eliminate excessive stacking around the airport. The CAA should be given responsibility for setting and monitoring such targets. The targets should be included within the relevant National Policy Statement for the development.

Government response

25. The Government acknowledges the point made by the Committee that excessive stacking has negative environmental effects. It also means delay for the passenger. In his decisions announced on 15 January on Adding Capacity at Heathrow Airport, the then Secretary of State noted the need for further work to improve existing airport and airspace procedures and to develop new ones to deal with delays and help make the airport more resilient. Work has been commissioned from the CAA on runway resilience at Heathrow and the Committee’s recommendation for setting targets for reducing excessive stacking will be considered in the light of the proposals that emerge from that.

Recommendation 9

26. It is clear that the development and application of new technologies and air traffic management techniques are integral to improving flight efficiency, thus reducing excessive fuel burn, and increasing airspace capacity.

Government response

27. The Government agrees with the Committee’s view that the development and application of new technologies and ATM techniques are integral to improving flight efficiency. We will aim to ensure that future UK plans are properly aligned with developing proposals that emerge from the European ATM Masterplan to be developed by the SESAR Joint Undertaking and this will be a key strand of the CAA’s Future Airspace Strategy work.

Recommendation 10

28. We have heard very wide support for Precision Area Navigation (P-RNAV), but a great deal of uncertainty remains amongst industry parties about the actual plans and commitments for the widespread introduction of this technology in the UK. The CAA should produce a strategy for P-RNAV within 12 months.

Government response

29. The CAA accepts the need to move from the largely ground-based Basic Area Navigation (B-RNAV) environment that has been in place in the UK above Flight Level 95 (approximately 9500 feet) since the late 1990s to a Performance Based Navigation (PBN) environment. Precision Area Navigation (P-RNAV) is, however, only one element in the multi-faceted strategy needed to complete this transition.

30. P-RNAV is the current terminal airspace standard and there remains a place for it within future implementation plans for UK airspace. However, P-RNAV alone will not deliver the solution to all of the UK's existing constraints on the use of airspace and it has to be considered as one tool amongst a number of other factors affecting capacity, flight efficiency, safety and the environment. It is worth noting that while a limited number of P-RNAV procedures do exist at certain airports, no other European state has systematically implemented a P-RNAV environment in airspace as densely utilised or as complex as that in the south-east of England.

31. The future navigation requirement is now being considered as an essential component of the FAS requirements and will need to dovetail with the international mandate on Performance Based Navigation issued by the ICAO Council in 2009. In the longer term, there will need to be alignment with navigation capabilities, in terms of trajectory management, that stem from the European ATM Masterplan. As such, this is not something that can be resolved in 12 months and the CAA is already looking ahead to determine if there are greater benefits to be gained from the next generation of Required Navigation Performance (RNP) applications.

Recommendation 11

32. There is currently noticeable variation between airports and between airlines in the take-up of CDAs. It is necessary to improve airports' performance in the use of CDA landings so that best practice standard is adhered to as near to universally as is achievable. The Civil Aviation Authority must adopt a more active role in encouraging the industry to adopt CDA. The CAA should monitor the CDA performance of major airports and airlines, publish statistics and promote practices and changes that lead to greater utilisation of CDA.

Government response

33. The Government continues to endorse the principles set out in the Arrivals Code of Practice which encourage the use of Continuous Descent Approach (CDA). The procedure has been highlighted as the principal method for reducing noise from arriving aircraft. The Department for Transport works with both the CAA and NATS to encourage CDA use and this collaboration has been fundamental in achieving the high rates of CDA compliance cited in the Committee's Report. A Government/industry working group consisting of representatives from BAA, CAA, NATS, airline operators and the then Department for Transport Local Government and the Regions developed the Code. This was published in February 2002 and a revised second edition was published in November 2006. The Code is hosted on the DfT website.

34. The development of CDAs at UK airports, principally at the three London noise designated airports (Heathrow, Gatwick and Stansted), is now regarded as international best practice and is helping to inform work to develop a global standard at ICAO. Overall achievement of CDA across these three airports has increased significantly following the wide circulation of the Code. This has brought environmental benefits (both noise and emissions) to local communities. CDA is employed at an increasing number of other UK airports. However, it must be recognised that CDA is not possible under all circumstances at every airport or, in some cases, without whole-scale airspace re-design. Following the publication of the Future of Air Transport White Paper, NATS were instructed by the CAA to include CDA concepts in all future airspace designs and this has been achieved in a large number of subsequent airspace changes.

35. On monitoring, DfT currently monitors CDA performance at Heathrow, Gatwick and Stansted as part of its responsibilities under section 78 of the Civil Aviation Act 1982 with performance being reviewed and discussed at the respective local airport Noise and Track Keeping Committees. Performance to date has been measured as a percentage of total arrivals. Information about CDA performance on an airline basis is collated by each of the three airports. In reviewing performance, it should be noted that the ability to perform a CDA is not always within a pilot's direct control because of factors such as adverse weather, other Air Traffic Control considerations and aircraft emergencies. Consequently as any comparison of CDA performance on an airline by airline basis is subject to considerable variation, information is not publically available.

36. Also of relevance is the requirement for major airports and those near agglomerations (large urban areas) to develop noise action plans in response to the European Environmental Noise Directive (2002/49/EC) (END implementation of the Directive is a devolved matter. The Department for Environment Food and Rural Affairs (DEFRA) is responsible for implementing this Directive through the Environmental Noise (England) Regulations 2006 (as amended). In England, the relevant airports are currently consulting on their plans and typically they will be reporting on measures to encourage the use of CDA. Following consultation, airports will submit their draft plans to DfT who will then decide whether or not to recommend to DEFRA that the plan is appropriate for adoption.

37. Having regard to these points the Government is currently unconvinced of the need for CAA to become more directly involved in monitoring CDA performance and related operational issues at individual airports.

Recommendation 12

38. We believe that many concerns from industry stakeholders could be alleviated by improved communication on the part of the CAA. The CAA should review its communication strategy in DAP (Directorate of Airspace Policy) to ensure that policy and technical matters are communicated in a timely and effective manner to all stakeholders.

Government response

39. It is disappointing that the Committee has been left with the impression that, aside from the lack of direct engagement on the Future Airspace Strategy, the Directorate of Airspace Policy's (DAP) engagement with stakeholders is less than ideal. This contradicts

positive comments that the Directorate has consistently received in feedback from its stakeholders over a number of years. In particular, the CAA has been complimented on a number of occasions for the manner in which it has kept the industry informed on developments in Europe. Further, DAP's National Air Traffic Management Advisory Committee (NATMAC) and its sub-groups provide an essential element of the CAA's stakeholder engagement strategy that has been recognised as best practice in Europe. Nevertheless, DAP continuously reviews its mechanism for communicating with stakeholders with a view to improving engagement and, in light of the comments made to the Committee, will actively seek to improve the mechanisms for engagement with all of its stakeholders.

Environmental impacts of airspace change

Recommendation 13

40. Tranquillity is a key factor in sensitive areas such as National Parks and Areas of Outstanding Natural Beauty. Current guidance appears to allow unchecked increases in aviation activity over these areas. Without some level of constraint, the noise environment in these areas might degrade progressively as traffic increases.

Government response

41. The Government recognises that tranquillity is becoming an increasingly important issue, particularly for those living in rural areas. But "tranquillity" is a subjective quality and as such can mean different things to different people – what may be seen as intrusion by one may be acceptable to another. Given these perception issues, it is not surprising that the task of measuring tranquillity is extremely difficult. There is no universally accepted metric by which tranquillity can be measured.

42. DfT's guidance to the CAA requires the Authority to pursue policies that will help to preserve tranquillity where this does not increase significantly the environmental burdens on congested areas. While Areas of Outstanding Natural Beauty (AONB) and National Parks are afforded certain statutory protection this does not extend to precluding over-flight by aircraft. In practice it would be impractical to prevent widespread over-flying of AONBs, or of National Parks without affecting reasonable levels of access to our airports.

43. DEFRA is in the process of developing a national noise strategy which will aim to manage noise in the context of sustainable development. This will include environmental noise from sources such as aircraft. DfT will be actively involved in the development of this strategy.

44. The European Environmental Noise Directive (END) requires that Member States aim to protect quiet areas in agglomerations from an increase in noise. The Directive also makes reference to quiet areas in the open countryside although no specific measures are currently required for these areas. DfT will continue to work closely with DEFRA on the implementation of the END.

Recommendation 14

45. The DfT and the CAA should examine the case for adopting maximum limits on noise levels and numbers of aircraft permitted per hour over sensitive areas such as National Parks and Areas of Outstanding Natural Beauty. The DfT should fund exploratory research on evidence based limits.

Government response

46. As stated in the response to Recommendation 13, DfT's guidance to the CAA requires the Authority to pursue policies that will help to preserve tranquillity where this does not increase significantly the environmental burdens on congested areas. Any restriction on flights over National Parks or AONBs would affect these existing policies and may result in any revised flight paths being routed over congested areas and potentially affect more—potentially significantly more—people. Any change in policy would require public consultation.

47. In terms of monitoring aircraft noise levels, the DfT is working with its Aircraft Noise Monitoring Advisory Committee (ANMAC)—whose role is to advise the Department on policy relating to aircraft noise at Heathrow, Gatwick and Stansted—on the scope for noise modelling at lower levels. The CAA has been asked by ANMAC to conduct initial work in this area and this is in progress.

48. The Government is aware that other organisations such as the Campaign to Protect Rural England have undertaken some work on the issue of tranquillity in the countryside and that there have been some discussions with the CAA. The Government believes that attempting to develop a widely accepted definition of the concept of tranquillity is likely to be a significant challenge; it should also be borne in mind that aircraft noise is likely to be just one of many factors in the equation.

Recommendation 15

49. The Department for Transport (DfT) should issue up-to-date Environmental Guidance to the CAA before the end of the year. The guidance should represent current Government thinking on CO₂ and other emissions in relation to transport decision making. The guidance must be clear about the basic policy principles by which the Government expects the CAA to make its airspace assessments.

Government response

50. The Environmental Guidance to the CAA already provides a clear framework for the CAA to discharge its air navigation functions. But we agree it needs to be updated to reflect more recent policy developments. It will not, however, be possible to update the guidance before the end of 2009 because we need first to consider what impact our ongoing work towards a new general environmental objective for CAA, on which we intend to consult later this year, would have on its content.

51. The 2008 Pilling Review¹ recommended that the CAA should have a general duty in relation to the environment, set within a clear policy framework from Government and within which guidance should be provided to help the CAA interpret that duty. In January 2009, as part of a statement on Britain's transport infrastructure, the Government announced the CAA would be given a new general environmental duty and that guidance on how to interpret this would be provided by the Secretary of State.

52. It would be inappropriate to update the Environmental Guidance to the CAA on exercising its air navigation functions before further developing work on the CAA's general environmental objective and the guidance related to that.

Recommendation 16

53. Once the DfT has issued new environmental guidance to the CAA, the CAA must produce clear and comprehensive new guidance on airspace change for the industry. The CAA should adopt a regular review cycle to update the environmental material in the document.

Government response

54. The CAA's Airspace Change Process guidance document (CAP 725) will, as a matter of course, be updated to reflect any changes to Government policy and any changes to the associated environmental guidance issued by DfT. All CAA policy and guidance material is already subject to a regular review cycle as part of the CAA's quality assurance process.

European developments

Recommendation 17

55. We support the principles of the Single European Sky (SES) initiative to create a more rational organisation of European airspace, for example by establishing cross-border Functional Airspace Blocks. It is unacceptable that, on such a crowded continent, airspace is still largely managed in isolation based on national borders. Greater harmonisation of air traffic management practices at the European level would lead to improvements in efficiency, environmental performance, and capacity. However, it is essential that NATS and the CAA remain at the forefront of SES developments over the coming decade. Their world-class expertise in air traffic management services is second to none in Europe. It is essential that the UK's high standards are the benchmark to which the SES initiative aspires and delivers.

Government response

56. The Government welcomes the Committee's support for the Single European Sky (SES), which we have strongly endorsed from the outset because of the improved efficiency, capacity and environmental benefits it will bring. We welcome the further revisions to the SES foundation regulations which will introduce a performance framework and accelerate the implementation of functional airspace blocks. As the development of

¹ "Report of the strategic review of the CAA", Sir Joseph Pilling, 2008

SES moves into this new phase, the CAA is resetting its objectives to address the wide range of initiatives in this complex package.

57. NATS and the CAA will continue to be at the forefront of SES work over the coming decade in terms of supplying expertise to Government through their involvement in SES-related fora and through involvement with their counterparts across EU and non-EU Europe.

58. The Government supports common standards but not a “lowest common denominator”. Rather we have always pushed for robust common standards to enhance Europe-wide safety in the skies and bring other States up to a level commensurate with that of the UK. The Government, CAA and NATS will continue to scrutinise SES proposals, consult widely and promote UK level standards and good practice in the negotiation process.

Recommendation 18

59. The Government must be explicit that the focus of the European network management function should be on co-operation, in order to improve efficiency across European airspace. The function should not have the power to overrule recommendations from the national regulator. Such recommendations are firmly based on consultation arrangements with people affected by flight paths.

Government response

60. The Government considers it sensible for there to be a Europe-wide network management function (NMF) involving cooperation between all the players to enhance the overall functioning of the system and complement the proposed performance framework. We support improvements to route and sector design, traffic flow management and central coordination of scarce resources, such as spectrum which will boost system performance, and lower the cost to users by optimising flight trajectories. There is no legislative intention or power to overrule national regulators and it is made explicit in the legislation that the NMF is without prejudice to the responsibilities of Member States with regard to national routes and airspace structures.

Recommendation 19

61. The Committee welcomes the statement made by the Minister and the CAA that the performance by the European Aviation Safety Agency (EASA) has improved. However, the Committee remains concerned that the extension of EASA’s remit may lead to a decline in safety standards and requests the Government and the CAA provide six-monthly reports on progress to this Committee.

Government response

62. The Government is committed to maintaining high standards of safety in air traffic management. EASA is currently in the early stages of the lengthy process of preparing Implementing Rules for air traffic management safety, which are unlikely to be adopted

before the end of 2012. The Government and the CAA will be involved at various key stages of this process and will keep the Committee informed as this work moves forward.

Recommendation 20

63. The CAA should lead work to establish the broad costs and benefits of SESAR for each of the different sections of the UK aviation industry. It should also set out how it intends to improve the phasing of projects within SESAR so as to maximise the benefits to aviation stakeholders most cost-effectively.

Government response

64. The Government and the CAA have supported SESAR from the outset as the technological arm of Single European Sky essential to deliver a modernised European air traffic management system capable of absorbing projected traffic growth safely and efficiently. SESAR has recently moved into its Development Phase which will see the SESAR Joint Undertaking oversee a programme of research and development work to test the ability of the SESAR concept to meet the challenges facing the European ATM system, including the associated costs.

65. We expect the Commission and the SESAR Joint Undertaking to apply effective project management techniques involving robust cost/benefit analyses, risk identification and mitigation and budget control as well as the development of sound funding proposals. The UK was influential in the EU Council of Ministers in the development of a resolution on the endorsement of the SESAR Master Plan. This calls on the Joint Undertaking to focus on the delivery of early benefits from SESAR through business cases, cost benefit analyses and consultation and therefore to lead on work to establish the costs and benefits of SESAR. Through this resolution, the UK and other EU Member States have the mechanisms to ensure that the JU will deliver on this work and both DfT and the CAA will have early sight of proposals through the Single Sky Committee (SSC) and progress reports to the Council of Ministers. The DfT in liaison with the CAA, NATS, MOD and aviation stakeholders will monitor progress and scrutinise any funding proposals or changes to the European Air Traffic Management Master Plan deemed necessary.

66. We fully recognise the importance of synchronising all the elements (such as ground and airborne equipment and legislative aspects) needed to implement individual projects, as well as of sequencing projects to ensure that capacity benefits are delivered as quickly and cost-effectively as possible. The Master Plan rightly prioritises projects that will deliver early capacity gains.