

Stage 7

Post-implementation review

Process overview

Stage 7 POST-IMPLEMENTATION REVIEW

Stage 7 Post-implementation review

The CAA reviews how the airspace change has performed, including whether anticipated impacts and benefits in the original proposal and decision have been delivered.

Purpose of the post-implementation review

271. In Stage 7 the CAA commences a post-implementation review, usually 12 months after implementation. The purpose of the review is for the change sponsor to carry out a rigorous assessment, and the CAA to evaluate, whether the anticipated impacts and benefits in the original proposal and published decision are as expected, and where there are differences, what steps (if any) are required to be taken.
272. The review is necessary to identify any subsequent requirements to further modify flight procedures, or the airspace structure (as applicable) to give effect to the terms of the original CAA decision (Stage 5), the need for which can only be determined after a period of operational experience, post implementation.
273. The post-implementation review is not a review of the decision on the airspace change proposal, and neither is it a re-run of the original decision process.

For more information about:

- **Post-implementation review** see [Appendix H](#)

Evidence collection

274. As part of an approval decision (Step 5B), the CAA will make clear:
- the precise data, operational information and other evidence that the change sponsor must collect during the 12 months from implementation in preparation for the post-implementation review
 - the format in which this information is required
 - how the impacts are to be measured
 - when the change sponsor must submit this information to the CAA (this will usually be 28 days after the end of the 12-month evidence collection period, but we will consider requests for a longer period).
275. Although the review usually takes place 12 months after the change is implemented, the change sponsor must begin monitoring and gathering data on the impacts of the change as soon as the change is implemented, and must ensure that it has collected the data it will need for proper comparison covering the period before implementation. This includes the impact on airspace users and those on the ground affected by aviation noise or other environmental impacts. An indicative list of data requirements is given in [Appendix H](#).

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276. The change sponsor must prepare a detailed analysis of how these impacts compare with what was set out in the airspace change proposal and accompanying options appraisal on which stakeholders were consulted. This is to demonstrate how the airspace change has performed in relation to the original Statement of Need, design principles and options appraisal.

277. Any comments or complaints received after implementation but before the review commences must be collated by the change sponsor in the CAA-agreed format. Any direct feedback that the CAA receives during this period will be forwarded to the change sponsor for inclusion in that feedback dataset.

278. The change sponsor publishes its analysis and documentation it has prepared on the **online portal**, and the CAA invites stakeholders to submit their own observations.

Stakeholder observations

279. Once the change sponsor's data submission is published on the portal, there will be a 28-day window during which any stakeholder may provide any feedback when carrying out this review about whether the impacts of the change are those expected, 12 months on. This feedback is submitted using the online portal.³⁸ Submissions are limited to one per individual (verified by email address). We give no assurance that we will take account of submissions made outside the 28-day window.

280. Before feedback is published on the portal, the CAA will moderate it to remove unacceptable material.³⁹ Guidelines on what we regard as unacceptable can be found in **CAP 1619**, but broadly we will moderate responses solely to prevent publication of defamatory, libellous or offensive remarks, or material that causes legal issues like copyright infringement or personal data.

281. The post-implementation review is not a second consultation on the original proposal, nor does the CAA hold a second Public Evidence Session. The review is inviting comments on whether implementation has had the impacts that were anticipated when the decision to agree the change was made by the CAA (or, if applicable, by the Secretary of State). Therefore the online portal will not accept stakeholder feedback until the complete set of data has been published by the change sponsor on the portal.

CAA assessment

282. If the impacts are not as predicted, the CAA will require the change sponsor to investigate why, so the CAA can determine whether further action is needed to change the airspace structure or to revise flight procedures to meet the terms of the original decision.

38. The CAA will also accept postal responses for the time being. We will reconsider in the light of experience whether this is still necessary when we conduct a review of the airspace change process in 2021 three years after implementation, to judge whether the administrative burden of uploading, monitoring and analysing postal responses remains proportionate.

39. The CAA's review after three years will also reconsider in the light of experience whether it is practical for the CAA to carry out this moderation role. We may decide, instead, that the change sponsor must moderate the responses in accordance with CAA guidance, requiring change sponsors to seek our approval before any redactions are made.

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283. The nature of each review is determined by the scale and impact of the airspace change, and during the assessment phase the CAA may decide to revise the scope and objectives of the review or to request more information.

284. The CAA prepares a report identifying:

- any differences from those expected
- any relevant best practice from ICCAN
- what mitigations or modifications are required for impacts that vary from those which were anticipated at the time the CAA made its decision to approve the airspace change
- any learning points where impacts vary from those which were anticipated.

285. The CAA publishes the report on the online portal.

Outcomes from the post-implementation review

286. The CAA will aim to produce a post-implementation review report within three months of the change sponsor's complete pre- and post-change dataset being published on the online portal. However, once this data has been published, the CAA may decide to extend this period in certain circumstances (see 'Timescales' below).

287. The following outcomes could apply to Stage 7. The CAA may:

- confirm that the implemented design satisfactorily achieves – within acceptable tolerance limits – the objective and terms of the CAA's approval, and the change is confirmed; or

- require modifications to better achieve the objective and terms of the CAA's approval; once the modifications have been implemented and operated for a period (approximately six months), there are three further possible outcomes:

- noting that the modifications did not better achieve the objective and terms of the CAA's approval, the CAA may conclude that the original design was satisfactory and the original change is confirmed; or
- noting that the modifications did not better achieve the objective and terms of the CAA's approval, the CAA may conclude that the original design was not satisfactory and the original change is not confirmed. In this case, in order to pursue its change, the change sponsor will need to commence a fresh airspace change proposal from Stage 1; or
- the CAA may conclude that the modifications do better – within acceptable tolerance limits – achieve the objective and terms of the CAA's approval and so the modified design will be confirmed.

288. Even where the change has been found to have achieved the objectives expected within the tolerances proposed, it may be appropriate for the change sponsor to carry out further mitigation or engagement activity to address issues that have emerged during the course of the airspace change.

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289. In the instances above where the outcome of post-implementation review is that a wholly new airspace change proposal is required, the question arises as to what happens in the meantime to the airspace design now in place. The change sponsor will have made clear to stakeholders at the consultation stage (Step 3C) to what extent an airspace change, once implemented, is reversible. Some changes that accommodate new technology may be mandatory. Some may have strong interdependencies and may be difficult to reverse. Therefore where an airspace change has not achieved its objectives, and the mitigation solution is a redesign rather than reversion to the pre-airspace-change position, the CAA will make a decision as part of its report as to what will happen in the meantime.

Timescales

290. The CAA initiates the post-implementation review usually 12 months after the change is implemented, to ensure that a full cycle of winter and summer operations has been observed in all weather and traffic conditions. However, if a change sponsor or another stakeholder makes a representation that a different period is needed to collect more representative data, the CAA will be prepared to consider an extension. This might be because, for example, the route that was the subject of the change has been used only infrequently and an extended period would allow a better data sample with a wider range of weather conditions. The CAA also reserves the right, exceptionally, to initiate a review at any other time if it considers this is warranted.

291. The change sponsor has 28 days from the end of the 12-month review period to collate, review and publish the required data.

292. Stakeholders have 28 days from publication of the complete set of data by the change sponsor on the portal to provide any feedback about whether the impacts of the change are those expected, 12 months on. We give no assurance that we will take account of stakeholder submissions received after that time.

293. The CAA will aim to review the evidence and publish our conclusions on the post-implementation review within three months of the change sponsor's data being published on the portal, in other words four months from commencement of the review. However, the CAA may decide to extend this period:

- in exceptional circumstances, most likely where there is a very high volume of stakeholder feedback to the published data, but we will give full reasons where this occurs
- where the CAA's initial assessment of this data leads us to ask for additional data from the change sponsor
- where the outcome of the review is that design modifications are required, in which case the timescales could be extended significantly depending on the extent of any redesign.

Scaling of Stage 7

294. There is no post-implementation review for Level 0 changes. A post-implementation review of Level 2 changes will be undertaken when it is proportionate to do so.

295. For some changes, the CAA may proportionately reduce the extent of evidence and data required from the change sponsor or allow more flexibility in the format of the data required. The CAA will set out the data it requires in its decision document.

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Outputs from Stage 7 to be uploaded to the online portal (see page 23 regarding redactions)

Output	Produced and uploaded by
Notification of change sponsor data collection requirements (in CAA decision)	CAA
Post-implementation review evidence submission	Sponsor
Stakeholder feedback on change sponsor's submission	Affected stakeholders (moderated by the CAA prior to publication and uploaded by the CAA where submitted by post)
Post-implementation review report	CAA
Review of modification requirements prepared by sponsor (if applicable)	CAA
Report on effect of modifications (if applicable)	Sponsor
Review of effect of modifications implemented by sponsor (if applicable)	CAA

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