



Consultation Strategy

St Athan ILS ACP Step 3A

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1 Consultation Strategy Overview

1.1 Introduction

Having met the CAA's assessment requirements at the combined Define and Develop & Assess Gateway on 26th July 2019, Stage 3 of the CAP 1616 process requires sponsors to develop a Strategy that sets out how it will engage and consult with stakeholders on the proposal.

This strategy forms part of the document set required to meet the requirements of the CAP 1616 airspace change process and aims to satisfy the Stage 3 Consult Gateway, Step 3A Consultation Strategy.

Following the submission of a Statement of Need (SoN) on 2nd July 2018, an initial Assessment Meeting on 20th March 2019 and follow-up meeting on 4th June 2019, the CAA Airspace Regulation Department agreed¹ to a scaled ACP submission for this proposal with a combined Define and Develop & Assess Gateway on 26th July 2019.

In its Gateway assessment, the CAA was satisfied that the change sponsor had met the requirements of the process to this Stage and approved progress to Step 3A, Consultation Preparation, the CAA assessed the level for the airspace change as Level 2C. .

1.2 Outline Strategy

In line with earlier decisions and this assessment, the sponsor proposes a scaled approach with a targeted yet comprehensive consultation over a shortened 4 week period. To facilitate this, a number of 'pre-consultation' stakeholder engagement activities have been conducted. In summary, the strategy will be to:

- Prepare a single consultation document, suitable for all stakeholders to understand, interpret and comment upon;
- Directly consult a specific group of aviation and non-aviation stakeholders that have been identified as a result of initial stakeholder engagement;
- Accept consultation responses from any source;
- Open consultation on 30th September for a 4 week period;
- Contact members of the stakeholder group who have not responded after 2 weeks;
- Contact members of the stakeholder group that have not responded after 3 weeks;
- Consider any request to extend the consultation period, although feedback from initial engagement suggests that this will not be required;
- Close consultation on 28th October;
- Review and analyse consultation responses and complete a Consultation Feedback report.

¹ Email (CAA Account Manager) to (Osprey) RE: 71299 - St Athan ILS Procedures ACP-2018-35 (sent 13:18 on Fri 14/06/2019)

1.3 Objectives

The sole aim of the proposal is to enable the publication of the existing St Athan ILS procedures, previously published in the Mil AIP, in the UK AIP.

The primary users of St Athan's ILS procedures are commercial aircraft using the Maintenance Repair and Overhaul (MRO) facilities based at St Athan. Although these aircraft only comprise around 1% of St Athan's total annual aircraft movements, they have a disproportionately high economic importance to both St Athan and this area of South Wales and are vital for the sustainability of the MRO businesses themselves. Since 1 April 2019 and the withdrawal of the ILS procedures, arriving commercial aircraft can only fly a visual approach, receiving vectors by NATS Cardiff ATC; this has caused uncertainty for MRO operations at St Athan as they are now more heavily weather-dependant. While they fly a near identical approach profile to when the ILS was available, these aircraft are only able to descend to 2,400 ft until the pilot acquires the required visual references to complete a visual approach.

1.3.1 Options that meet the objective

The baseline for the proposal is to restore the situation that existed up to 31st March 2019, when regulatory oversight at St Athan was provided by the Military Aviation Authority (MAA) and two ILS procedures were published in the Mil AIP. The current situation is that on 1st April 2019 regulatory oversight of St Athan was transferred to the CAA and, because the ILS procedures could not be transferred to the UK AIP without an ACP, the procedures were withdrawn.

A number of options were discussed in more detail in the Step 2A submission. The only alternative technical solution would have been the introduction of RNAV procedures to replace ILS procedures. This was discounted as it would involve a lengthy, costly airspace change application that would potentially change aircraft's heights and tracks over the ground, resulting in both environmental and societal impacts. This option was discounted because it was not considered proportionate and did not meet the SoN.

Preceding submissions identify that there is only one viable option that meets the SoN for the successful implementation of the proposal, that is, to publish the St Athan ILS procedures in the UK AIP. This single option was therefore appraised against the 'do nothing' scenario, the permanent withdrawal of ILS procedures from St Athan. The Step 2B Options Appraisal demonstrated the negligible impact on all stakeholders and also illustrated the negative operational and, particularly economic, impacts of 'do nothing'.

Despite the limited options available, during the course of this ACP the sponsor has sought to ensure that appropriate stakeholders are made aware of the proposal. These comprise aviation stakeholders who operate in the vicinity of St Athan and non-aviation stakeholders in the local area. Through the engagement activities conducted so far, the sponsor is confident that the correct audience has been identified and targeted in an appropriate manner; such engagement underpins this Consultation Strategy. The aim of the consultation materials will be to provide stakeholders with enough information to understand the proposal and make an informed response, within the desired consultation period.

1.3.2 A Scaled and targeted CAP 1616 Airspace Change Proposal

The sponsor seeks a targeted approach because the proposal does not alter the historical track, altitude or the number of aircraft arriving at St Athan, nor the classification or dimensions of surrounding airspace. We have assessed that there will be no change in impact to noise, tranquillity, biodiversity or CO2 emissions. The approach complies with the spirit of CAP 1616 and The Green Book², however, as no environmental impacts have been identified, the Department for Transport's WebTAG³ analysis guidance has not been employed.

The consultation strategy will highlight, in non-technical terms where appropriate, that the proposal aims to return to the status quo through the publication of two ILS procedures in the UK AIP and that this will have no discernible impact on aviation and non-aviation stakeholders when compared to the period when they were previously in operation. It will be explained that the procedures were previously published in the Mil AIP and that if the ACP is approved for the publication in the UK AIP, when compared to the pre-31st March 19 situation, there will be no new impact on any of the following stakeholder groups:

- Third parties on the ground and the environment;
- Other airspace users; and,
- Aircraft operators and air navigation service providers.

It will equally be explained that, due to seasonal variations in traffic levels and favourable weather conditions during the subsequent period, stakeholders may have noticed little difference as aircraft will have continued to fly visual approaches when able.

² The Green Book: Appraisal and Evaluation in Central Government;
<https://www.gov.uk/government/publications/the-green-book-appraisal-and-evaluation-in-central-government>

³ DfT transport analysis guidance WebTAG:
<https://www.gov.uk/guidance/transport-analysis-guidance-webtag>

2 Engagement Activity Undertaken to Date

2.1 Introduction

A targeted range of engagement activities have been conducted in accordance with the process agreed at the Discussion Meeting with the CAA held on 4th June 2019, either through face to face meetings, group presentations, by telephone or by email. Specifically, stakeholders have been made aware of the details of the proposal and the sponsor's desire to conduct an abbreviated consultation period of 4 weeks duration. Considering the nature of the proposal, all those with whom initial discussions have been held are content with the suggested abbreviated consultation period.

2.2 Stakeholder Engagement Summary

A full list of stakeholders is at Annex A1 and evidence of engagement to date at Annex A2. Aviation stakeholders that have been specifically engaged on this topic include:

- The MRO companies based at St Athan (face to face meetings), who have provided statements on the ILS at Annexes A4 and A5;
- Airlines that use the MRO facilities (by email);
- The General Aviation (GA) flying training company based at Cardiff Airport (by telephone);
- Cardiff Heliport, located adjacent to the extended centreline of runway 25, 13 nm East of St Athan (by telephone);
- Whilst the University of Wales Air Squadron is based at St Athan, as the MoD is a mandatory stakeholder in all airspace change proposals, initial contact has been made through the Defence Airspace and Air Traffic Management (DAATM) organisation. All formal MoD consultation will be conducted through the DAATM;
- Serco, the ANSP providing aerodrome control at St Athan (face to face);
- NATS, who provide air traffic control services in the Cardiff CTR/CTA (face to face);
- Bristol Airport has also been made aware of the proposal and will be included in formal consultation;
- The Cardiff Airport Consultative Committee, which has a wide range of local community and council stakeholders throughout the area beneath Cardiff Airport's controlled airspace.

A set of minutes has been prepared for each face to face meeting held, which participants were asked to review. This comprehensive engagement has allowed us to draw the following conclusions with regard to the development of a Consultation Strategy:

- The nature of the 'airspace change', the fact that aircraft will still have been flying visual approaches on the same profiles since the ILS procedures were withdrawn (albeit with a degree of operational disruption) and the ability to

access a range of representative stakeholder views, reinforces the assessment of a Level 2C airspace change and with it tailored consultation activities rather than full public consultation.

- We have identified and engaged all relevant stakeholder groups who may have an interest in this 'change'.
- We have identified relevant stakeholders which will ensure consultation will result in a broad range of representative responses.
- The Cardiff Airport Consultative Committee is the appropriate body to represent the views of residents in the vicinity of this procedure.
- All stakeholders are both informed and prepared to participate in consultation once commenced.
- Stakeholders felt that a 4 week consultation period would be adequate but were assured that more time would be granted if requested.
- The stakeholder engagement summarised above provides assurance that appropriate engagement has occurred using recognised process and that all relevant stakeholders are fully aware of the change proposal.

3 Consultation Stakeholders

3.1 Local Communities

As identified in Stage 2, those on the ground will experience no difference to that prior to 31 Mar 19 when the procedures were suspended. The tracks over the ground will remain as published in the Mil AIP and traffic levels will be maintained in line with levels experienced prior to suspension. The proposed publication in the UK AIP is not a means to increase capacity at the airport.

In addition, as identified in our separate submission to the CAA on environmental impact analysis (shown at Annex A3), there is a seasonal variation associated with St Athan traffic which means that traffic levels currently experienced by residential stakeholders are naturally reduced. Therefore, residents are experiencing no difference to what would normally be expected at this time of year.

The sponsor believes that consultation with the Cardiff Airport Consultative Committee is an appropriate and proportionate approach to gathering the views of those representing local communities; the composition of the committee, shown at Annex A1, comprises representation of all residents in the Cardiff Airport area (and thereby in the vicinity of the ILS flightpath which lies to the east of St Athan). Members of the Consultative Committee have been specifically asked to distribute consultation materials within their respective council areas, and to copy-in the sponsor, to ensure a wide distribution of the materials. Clearly other residential stakeholders could respond to the consultation via the CAA portal should they wish, but the sponsor believes this to be a proportionate, pragmatic and effective method of gaining meaningful feedback on the proposed change.

3.2 Aviation Stakeholders

The aviation stakeholders being directly contacted are those such as the MRO companies based at St Athan whose customers previously used the Mil AIP published ILS procedures, or those who operate in, or have an interest in, the controlled airspace in the St Athan vicinity:

- Aviation Stakeholders:
 - Aeros Flight Training, Cardiff;
 - Bristol Airport;
 - Bristow Helicopters, St Athan;
 - eCube, St Athan;
 - Cardiff Heliport;
 - Defence Airspace and Air Traffic Management (DAATM), Ministry of Defence;
 - Caerdav, St Athan;
 - Horizon Flight Training & Aircraft Services, St Athan;
 - National Air Traffic Services (NATS) Cardiff;
 - National Police Air Services (NPAS), St Athan;
 - Serco, St Athan;

It is not planned to consult with additional GA aviation stakeholders or national aviation groups through NATMAC for the following reasons:

- The St Athan ILS procedures are almost entirely contained within the controlled environment provided by the Cardiff Airport CTA/CTR. GA flightpaths and profiles have therefore been unaffected by the availability or otherwise of the St Athan ILS.
- Even since the suspension of the procedures MRO aircraft inbound to St Athan have continued to fly the same approach profile (albeit as a visual approach rather than straight in approach).
- The very small number of ILS movements means that, even if there were an unanticipated impact, the prospect of it occurring and it having an effect is remote.
- The ILS procedures were previously published in the Mil AIP and the proposal is simply to move them into the UK AIP. All users of the ILS procedures are being consulted directly; there are no other aviation stakeholders within the GA or NATMAC group who will use or be affected by the publication of the ILS procedures in the UK AIP.

It is therefore reasonable to conclude that there has been no change from a GA perspective. Aviation stakeholders who use, and therefore will be affected by the proposal, have been engaged throughout Stages 1 and 2.

3.3 Environmental Stakeholders

Under a separate cover (71322 004 dated 5 Aug 19) shown at Annex A3, the sponsor submitted their proposals regarding environmental impact assessment. Their conclusions were that an environmental impact assessment is impossible; not least because there is currently no environment impact (due to an annual seasonal reduction in traffic levels and more favourable weather conditions). This is illustrated in the graphs at Annex A6 that show annual MOR movements to St Athan 2014-19 and, specifically, over the period April-August 2014-19. There could be an impact from Sep/Oct onwards (due to the seasonal increase in traffic levels and less favourable weather conditions) but it would be entirely speculative, and therefore potentially misleading, to try to guess what that impact may be.

For example, some aircraft may cancel St Athan and go elsewhere; some may try to make an approach at St Athan and go around from an unstable approach or insufficient visual references due to weather; some may try to make an approach and divert due to weather; some may still be able to fly a visual approach due to favourable weather conditions on the day; some may delay arrival to await more favourable weather (as has been seen, requiring the airport to open outside its normal hours). It was clear that, from this list of potential variables is impossible to predict any environmental impact; an assessment can only be made on current evidence and that is not sufficiently representative to derive conclusions.

As, based on current evidence, there is no perceived or actual change in environmental impact nor can any be predicted with any degree of confidence, it is not proposed to consult environmental stakeholders regarding this airspace change.

4 Consultation Approach

4.1 Communication Approach

All key stakeholders (listed in Annex A1) who were engaged prior to the commencement of Stage 3 will be directly contacted via email and asked to respond to the consultation.

Although the sponsor seeks a scaled and abbreviated consultation, the importance of consultation is fully recognised and best practice, exemplified by the Gunning Principles⁴, listed in Annex A7, will be followed. Information will be gathered from stakeholders to understand their views on the proposal and to allow them to provide relevant, informed and timely feedback.

It is recognised that, in a standard consultation, there is a risk that a representative group may have been missed. However, in this instance this is mitigated by the engagement already undertaken and the assessment that no stakeholder group will be impacted by the proposal. It is therefore not intended to target anyone other than those shown at Annex A1; that said, the consultation documentation will be freely available on the CAA portal.

Stakeholders will be informed via email when the consultation is launched. They will be able to view and download the consultation documentation from the CAA's online consultation portal. This is also where they can submit a response to the consultation. Any individual or organisation may submit a response, but only the organisations discussed in this document will be directly contacted by the sponsor. The sponsor will maintain full records of engagement activity and subsequent consultation with all stakeholders (irrespective of their origin) throughout the process. Should they require assistance the sponsor will also assist stakeholders in gaining access to the airspace change documentation and submitting their response.

4.2 Consultation Period

It is acknowledged that, under CAP 1616, consultation would normally take place over (at least) a 12 week period. However, the sponsor is proposing a foreshortened 4 week period of consultation for the following reasons:

- There is no physical difference in the proposed procedure;
- There is no environmental impact associated with the airspace change;
- There is no perceived impact on aviation and non-aviation stakeholders (subject to consultation);
- Engagement has already been conducted with intended stakeholders;
- The consultation audience is well informed (i.e. familiar with aviation and operations at Cardiff/St Athan) and prepared (the sponsor has already made contact with them);

⁴ <https://www.local.gov.uk/sites/default/files/documents/The%20Gunning%20Principles.pdf> accessed 23 Jul 19.

- While the duration of consultation would be reduced, there would be no reduction in the nature of consultation activities or the consultation material itself;
- Stakeholders have stated that 4 weeks should be sufficient for them to respond;
- If any consultee requires an extension to the consultation period, this will be considered;
- There is a seasonal increase in traffic during the winter period. There is a desire to re-introduce this procedure before the adverse impact of poor weather has an effect;
- Consultation material would be assessed in the normal manner.

In summary, while the duration of consultation would be reduced, the quality and effectiveness of it would not be diminished.

4.3 Consultation activities

The consultation documentation will provide clear information on the proposed change and the options that were considered in its development. This will enable those consulted to form a reasonable understanding of the situation. It will describe clearly why the sponsor feels that the change will have no impact upon them. Nevertheless, stakeholders will be given sufficient information in suitable language to allow them to reach their own conclusion with regard to the proposal. Equally they will be given assurance that their views will be taken into account and that inclusion of the procedures in the UK AIP, as published in the Mil AIP, is not a forgone conclusion.

Respondents will also be able to submit a postal response to the consultation. We will not commit to respond to postal responses directly; however, respondents are welcome to include a stamped envelope if they do require a reply. The consultation postal address will be available online and within the consultation document.

If the shortened consultation period is approved, at the 2 week mid-point, the sponsor will send follow-up emails to stakeholders who have not responded reminding them of the closing date. To achieve maximum participation if, by the final week of the consultation a stakeholder has not replied, a final reminder of the closing date and a request for a response will be sent.

Consultation responses will be acknowledged by sending a return completion message to the user, using the email address provided. Responses will be categorised in accordance with CAP 1616 Appendix C and posted on the CAA portal.

Considering the targeted list of consultees, the sponsor will address any specific questions directly and also post responses to any Frequently Asked Questions (FAQs) on the portal as required. In the unlikely event that an unexpected, challenging response is received, the sponsor will commit additional resources to resolve the challenge.

If responses contain any commercially sensitive data, this will be redacted.

At the end of the consultation period the sponsor will collate and review the responses received, addressing any that might affect the final submission. In this

case, the sponsor will set out any changes between the initial consultation and final submission, following the recommended 'we asked, you said, we did' format.

4.4 Consultation Materials

It is planned to conduct the consultation primarily via the internet, email and the consultation portal but, as previously discussed, respondents will also be able to submit a postal response. Cardiff Airport has kindly agreed to support St Athan in publicly advertising the consultation; a notice will be posted on the Cardiff Airport website directing people to the CAA Portal and the consultation deadline. The notice will remain available throughout the consultation period and will be followed with a notice stating that consultation has closed.

The Consultation Document will be available on the portal, along with previous stage document submissions, and outlines the expected benefits of the proposal and the sponsor's assessment of a lack of impact. It will be available for download and will include questions for users to complete and the option to submit additional comments. Information on the responder will also be collected, including the organisation they represented and (optionally) their postcode. The consultation document has been written such that it contains enough relevant information for stakeholders to provide an informed response.

4.4.1 Proposed Consultation Material

Considering the relatively straightforward nature of the proposal a single Consultation Document, using clear and accessible language, will be provided. Any technical aviation language will be explained for non-specialists.

The Consultation Document will begin with an introduction to the Airspace Change Process and an explanation of the purpose of consultation. It will then describe the specifics of the proposal, including the baseline situation, the options considered and its perceived benefits and impacts. It will conclude with a description of how stakeholders can participate.

4.4.2 Schedule of consultation

- 27 Sep 19 – CONSULT Gateway;
- 30 Sep 19 – Consultation begins;
- 28 Oct 19 – Consultation ends (unless a stakeholder requests an extension).

It is recognised that this is an ambitious timeline. The sponsor intends to prepare, at their own risk, the necessary consultation material ahead of the CONSULT Gateway. If approval is granted, the sponsor will immediately launch consultation. However, the sponsor equally commits to ensuring that any requirements, observations or feedback from the CAA resulting from the CONSULT Gateway will be addressed before consultation begins.

4.5 Reversion Statement

The sponsor considers this proposal to be the 'do minimum' option. The 'do nothing' option would see the permanent withdrawal of the St Athan ILS, with the attendant negative impact on the sustainability of the MRO operations at St Athan.

Should the proposal be approved and implemented, this will itself be a reversion to the pre-existing scenario and will enhance the long-term viability of St Athan's MRO businesses.

4.6 Post-Consultation and Next Steps

The sponsor has identified publishing the St Athan ILS procedures in the UK AIP as the only practical option to meet the SoN and, in light of the previously agreed strategy for a scaled submission based on the minor nature of the change, seeks a consultation period of 4 weeks. The results of initial stakeholder engagement already undertaken has been used to augment the Full Options Appraisal being prepared for Stage 3.

After the consultation, a feedback document will be compiled, summarising the themes and the sponsor's response to any issues raised. It will illustrate how the sponsor has heard and understood the responses received, how those responses might impact the proposal and, where they do not influence the proposal, why not. All feedback will be presented transparently, detailing why responses have been categorised and how those responses will be acted upon. The feedback document will be available for download via the portal and the final submission will be drafted based on the final design described in the feedback report.

The sponsor considers this consultation strategy to be reasonable and proportionate. Relevant stakeholders have been identified and initial engagement with those most likely to be impacted has been completed. Stakeholders have received advanced notice of the proposed 4 weeks consultation subject to CAA approval and a swift response to consultation has been requested. Notwithstanding the sponsor's view that only one viable option has been identified, it has been made clear that there is scope to change the proposal based on stakeholder feedback.

Subject to passing the Stage 3 Gateway Assessment, the sponsor will finalise the consultation material and launch the consultation as swiftly as practicable to expedite the change process.

A1 List of Stakeholders

The consultation is most relevant to the stakeholders listed below, who will all be emailed PDF copies of the consultation material, and sent links to the consultation feedback website. The list is not exclusive and, while any individual or organisation may submit a response, the sponsor is only specifically targeting the organisations discussed in this document.

A1.1 Aviation Stakeholders:

Aeros Flight Training, Cardiff
Bristol Airport
Bristow Helicopters, St Athan
eCube, St Athan
Cardiff Heliport
Defence Airspace and Air Traffic Management (DAATM), Ministry of Defence
Caerdav, St Athan
Horizon Flight Training & Aircraft Services, St Athan
National Air Traffic Services (NATS) Cardiff
National Police Air Services (NPAS), St Athan
Serco, St Athan

A1.2 MRO Customer Airlines Consulted

SAS
TUI
EasyJet
Spire Flight Solutions
Titan Airways

A1.3 Non-Aviation Stakeholders - Cardiff Airport Consultative Committee

Bridgend County Borough Council
Cardiff Council
Llancarfan Community Council
Vale of Glamorgan Council
Vale Tourism Association

A2 Engagement Evidence

Date	Organisation	Remarks
31-Jul	[MRO Company]	Minuted meeting with CEO and Directors
31-Jul	[MRO Company]	Minuted meeting with Director
31-Jul	Serco	Minuted meeting with Manager ATC, St Athan
31-Jul	NATS Cardiff	Minuted meeting with Cardiff ATC Manager Ops and Training
05-Aug	Cardiff Heliport	Email request sent and follow-up telecon 7 Aug, no issues raised
05-Aug	DAATM	Email and follow-up telecon telecon, content with 4 week consultation
05-Aug	UWAS	To be consulted via DAATM
06-Aug	SAS	Email request sent and reply received 6 Aug, examples impact of unavailability of ILS
06-Aug	TUI	Email request sent and supportive reply received 8 Aug, examples of impact of unavailability of ILS
06-Aug	Titan Airways	Email request sent 6 Aug, hastener sent 20 Aug, no reply by 28 Aug
07-Aug	Horizon	Telecon, no issues raised
08-Aug	Corendon (Airline)	Email request sent 6 Aug, reply received 8 Aug
14-Aug	Aeros Cardiff	Email request sent 6 Aug. Telecon 14 Aug, no issues raised
15-Aug	National Police Helicopter Services (NPAS)	Email request sent 15 Aug, telecon 18 Aug, no issues raised
15-Aug	Bristow Helicopters (SAR)	Email request sent 15 Aug, hastener sent 27 Aug, telecon 2 Sep, no issues raised
19-Aug	Spire	Email request sent 6 Aug, reply received 19 Aug with examples of impact of unavailability of ILS.
19 Aug	Cardiff Airport Consultation Committee	Presentation and Q&A delivered to committee

21-Aug	EasyJet	Email request sent 6 Aug, supportive reply received 21 August with examples of impact of unavailability of ILS.
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A3 Letter to CAA on environmental impact assessment

[Name]
Airspace Regulator (Environment)
Airspace Regulation Department
Aviation House
Civil Aviation Authority
Gatwick Airport South
West Sussex
RH6 0YR

Date: 5th August 2019
Osprey Ref: 71322 004
CAA Ref: ACP-2018-35

Dear [Name],

Response to request for quantitative environmental data

Introduction

Following successful completion of the Stage 1 and 2 Define, Develop and Assess Gateways, the CAA highlighted the need to conduct a quantitative environmental assessment as part of our Stage 3A submission. To develop our understanding of the requirement a conference call was held between the CAA ([name]) and Osprey staff ([names]). As a result of this and further engagement with both the Welsh Government and Operators at St Athan we feel it is appropriate to submit our proposals on this issue ahead of the Consult gateway to ensure the CAA are content with our proposed approach.

The baseline for assessment

Our baseline for assessment is the pre-31 March 2019 situation, where 2 ILS procedures were available at St Athan. We would then consider what change in environmental impact, if any, has occurred in the intervening period whilst the ILS procedures have been unavailable. Finally, we will consider any environmental impact changes once the ILS procedures are re-established (ie a return to the pre-31 March 2019 situation).

Initial stakeholder engagement meetings held on 31st July 2019 with Serco (St Athan ATC), NATS Cardiff and the two MRO companies based at St Athan, confirm our working assumption that if it was available, the vast majority of aircraft arriving to use St Athan's MRO facilities would fly an ILS procedure.

Impact of seasonal variation

MRO operations are, by their nature, affected by seasonal variation. This is particularly the case for St Athan whereby service providers such as [MRO Company] and [MRO Company] particularly support short-hall holiday operations. Operators plan maintenance and even decommissioning of their aircraft during the quieter winter months. Such statements are supported by the table below which show that, on average, the period May to September shows a downturn in traffic; this trend is continuing in 2019.

Table 1. Annual St Athan MRO Movements by month 2014-2019

	2019	2018	2017	2016	2015	2014
Jan	5	3	4	5	10	12
Feb	13	8	3	10	8	15
Mar	6	0	5	15	10	11
Apr	13	5	6	22	11	2
May	7	5	5	3	12	6
Jun	3	0	0	11	14	18
Jul	x	5	2	5	4	5
Aug	x	4	1	4	6	5
Sep	x	4	1	6	8	2
Oct	x	7	6	12	7	4
Nov	x	23	4	11	14	5
Dec	x	5	4	6	14	8
TOTAL	47	69	41	110	118	93

Therefore, even though we have assumed that every MRO movement would utilise the ILS, any reduction in movements cannot be attributed to the unavailability of the ILS and is far more likely to be associated with the annual season variation in MRO activity. It would therefore be inappropriate to attribute any reduction in environmental impact from April onwards to withdrawal of the ILS.

Economic impact

While the annual numbers of MRO movements is very low, they have a disproportionately high economic/business impact to both St Athan and the South Wales region as a whole. Statements by MRO service providers at Annex A indicate that the unavailability of the ILS has adversely impacted on St Athan's attractiveness and competitiveness to operators, both in the short term and the medium to long term. Whilst they suggest that a small number of aircraft operators

may have been unwilling to use St Athan as a result, favourable weather conditions meant that operations could continue, although not necessarily at the operator’s time of choosing.

Therefore, while statistically small in number, even if only one or two movements were affected by the unavailability of the ILS, the economic impact on St Athan would be disproportionately high.

Environmental impact assessment

As outlined above, and highlighted more specifically in the table extract below, in the short time period available for comparison, aircraft movements at St Athan are more directly affected by seasonal variations than specifically the withdrawal of the ILS. It would therefore be inappropriate to attribute an environmental impact associated with withdrawal of the ILS.

	2019	2018	2017	2016	2015	2014	Mean
Apr	13	5	6	22	11	2	9.8
May	7	5	5	3	12	6	6.3
Jun	3	0	0	11	14	18	7.7
TOTAL	23	10	11	36	37	26	

In terms of calculating variations in fuel burn, it should be recognised that although there has been an impact associated with withdrawal of the ILS, due to the prevailing weather conditions aircraft have still been able to operate at St Athan albeit not necessarily at the time of their choosing, instead relying on favourable weather conditions. Nevertheless, there have been instances since April 2019 of crews cancelling planned flights to land at St Athan due to poor forecast meteorological conditions. On 26 April a [airline/aircraft type], scheduled to land at St Athan, diverted to Cardiff due to poor weather. When the weather improved later that day, the aircraft departed Cardiff and landed safely at St Athan having completed a visual approach. In another example, an [airline/aircraft type] was due to land at St Athan on Friday 19 July, but cancelled due to the forecast weather. However, rather than lose the business for the MRO in question, the airport arranged an unscheduled opening on Saturday 20 July, when the weather was better and the aircraft landed safely, albeit at significant additional cost for fire fighters and ATC, which was borne by the airport.

Both ATC units and the MRO operators at St Athan state that, in terms of fuel burn, there is little or no difference in an ILS approach compared to a visual approach. In both instances, NATS Cardiff position inbound aircraft at 10 nm final approach to runway 25, either to intercept the ILS localiser (when available) or to make a visual approach. When combined with the low statistical number of movements and no perceivable reduction during the period in question (due to seasonal variations), we feel it is not only impossible but equally potentially misleading to attribute an environmental impact thus far associated with withdrawal of the ILS. That said, for the example of 19 July 2019 given above, had the aircraft not come to St Athan as the flight was for scheduled maintenance, the operator would have had to fly to an alternative facility with, depending on location, potentially a greater fuel burn for the flight.

Clearly the winter months, which not only represent St Athan's busier period in terms of MRO movements but equally more frequent periods of poor weather, are likely to have a greater environmental impact. However, it is impossible to speculate what degree of impact may be seen; operators may elect to use other MRO providers resulting in a reduction in traditional levels of activity. Conversely, aircraft may be more likely not to land either because of greater instances of unstable approaches or an inability to acquire the required visual references. Once again, an assessment of such impacts would be highly speculative and unsubstantiated.

Conclusion

From the very limited statistical evidence provided above it is impossible to discern trends in terms of the impact of the current withdrawal of the ILS; consequently, it is equally impossible to assess either a positive or negative environmental impact for the period in question. Seasonal variations in movements have masked any impact thus far; it is anticipated that impact will be more keenly felt as the number of movements increase and prevailing weather conditions decrease in the winter months. However, to attempt to predict the impact of so many factors which are outside the sponsors control would be highly speculative and potentially misleading.

In conclusion, having studied the MRO-related aircraft arrivals at St Athan both historically since 2014 and specifically since April 2019, it is not possible to provide evidence-based quantitative assessments of the environmental impact of the non-availability of ILS procedures.

Yours sincerely,

[Osprey Staff]

CC: [CAA Account Manager], Airspace Regulator (Technical)

A4 Statement on St Athan ILS from [MRO Company]

From: [MRO Company]
Sent: 08 July 2019 10:53
To: [St Athan]
Subject: ILS

[St Athan Airfield],

This is an extraordinary situation that is genuinely impacting our business, both in terms of the practicalities of airfield operation, and the credibility of EGDY/EGSY as an airfield - the repeated activation and de-activation of this ILS is impossible to explain to our customers and does not create a professional image of this location. Furthermore, many of our larger 'national carrier' customers are very reluctant to operate to a VFR location, since their crews have limited experience with these kind of operations ([airline client] recently refused to bring aircraft to our facility). Obviously the risk of diversion is increased with VFR approaches, and our customers are not only impacted with the direct costs of the ATC/Nav charges and fuel, but suffer significant effects of crew re-scheduling - which can be economically very substantial. The reputational damage to both [MRO Company] and St. Athan of VFR diversions is not possible to tangibly estimate, but is a genuine concern for us.

After 7 years of operation at St. Athan our business has matured to a point where the throughput is relatively stable. We received [number] aircraft arrivals in 2018 with [number] departures, and do not expect that will change - we are budgeting approximately [number] movements per year for the next couple of years.

Best Regards,
[MRO Company]

A5 Statement on St Athan ILS from [MRO Company]

From: [MRO COMPANY]
Sent: 08 July 2019 16:02
To: [St Athan]
Subject: ILS at St. Athan
Importance: High

Dear [St Athan],

[MRO COMPANY]'s operation is dependent on a constant ILS availability.

We would lose substantial business worth millions of pounds, if we can't prove to our clients, that we have an ILS available. This would have a knock on effect, because our investors wouldn't continue to invest in our company, which would jeopardize our restructuring and growth plans.

At this stage, our main customers are reluctant to sign any GTA (General Terms Agreement) unless we can give green light on the ILS.

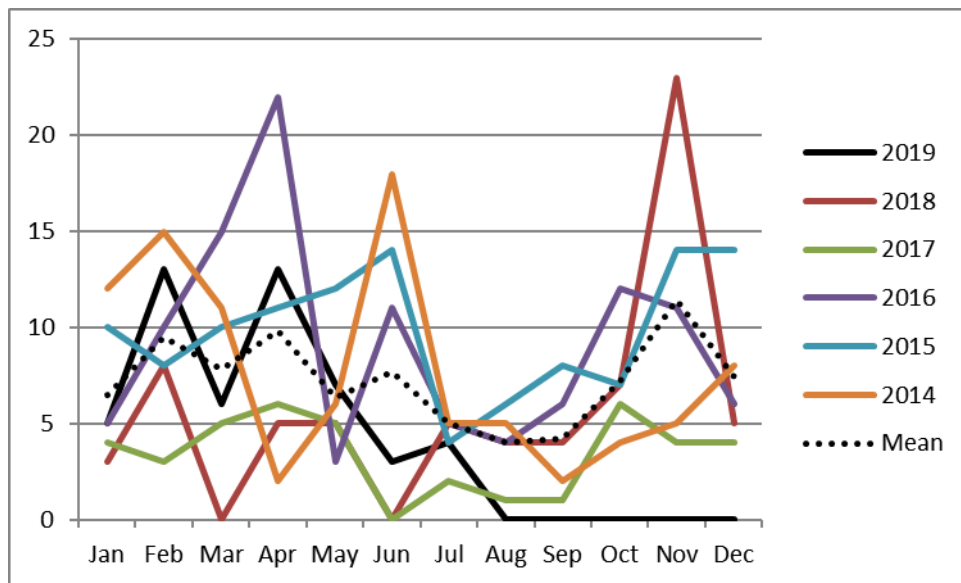
We really hope that a solution can be provided asap.

With kind regards,

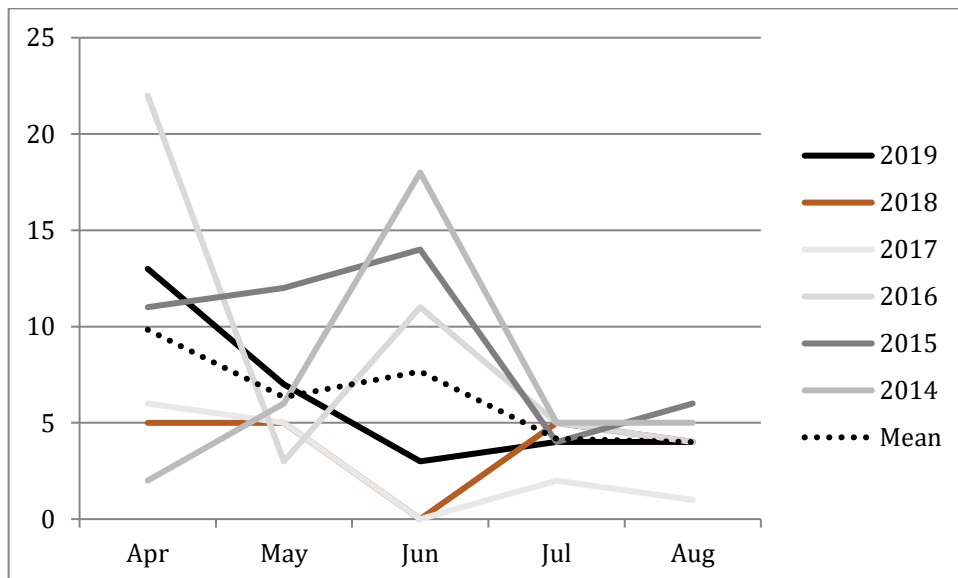
[MRO COMPANY]

A6 Graphs showing St Athan MRO movements

Graph showing seasonal variation in movements 2014-19 (up to July 2019) – fewer movements during summer months with higher volumes of maintenance typically undertaken outside peak holiday periods.



Graph showing MRO aircraft movements at St Athan April-August 2019 versus movements in same period 2014-2018



A7 The Gunning Principles

The Gunning Principles are a set of rules for public consultation that were proposed in 1985 by Stephen Sedley QC, and accepted by the Judge in the *Gunning v London Borough of Brent* case. They comprise four rules, which form a strong legal foundation from which the legitimacy of public consultations can be assessed:

1. **proposals are still at a formative stage** A final decision has not yet been made, or predetermined, by the decision makers
2. **there is sufficient information to give 'intelligent consideration'** The information provided must relate to the consultation and must be available, accessible, and easily interpretable for consultees to provide an informed response
3. **there is adequate time for consideration and response** There must be sufficient opportunity for consultees to participate in the consultation. There is no set timeframe for consultation, despite the widely accepted twelve-week consultation period, as the length of time given for consultee to respond can vary depending on the subject and extent of impact of the consultation
4. **'conscientious consideration'** must be given to the consultation responses before a decision is made Decision-makers should be able to provide evidence that they took consultation responses into account