



St Athan ILS ACP Step 3D

Collate and Review Responses

Date: 29th October 2019

Author: [REDACTED]

Revision: Issue 1

Osprey Ref: 71322 012

This document is of UK origin and has been prepared by Osprey Consulting Services Limited (Osprey) and, subject to any existing rights of third parties, Osprey is the owner of the copyright therein. The document is furnished in confidence under existing laws, regulations and agreements covering the release of data. This document contains proprietary information of Osprey and the contents or any part thereof shall not be copied or disclosed to any third party without Osprey's prior written consent.

© Osprey Consulting Services Limited 2019
The Hub, Fowler Avenue, Farnborough Business Park, Farnborough, GU14 7JP
01420 520200 / enquiries@ospreycl.co.uk
Registered in England and Wales under No: 06034579



Document Details

Reference	Description
Document Title	St Athan ILS ACP Step 3D
	Collate and Review Responses
Document Ref	71322 012
Issue	Issue 1
Date	29 th October 2019
Client Name	Welsh Government Aviation Team
Classification	Commercial in Confidence

Issue	Amendment	Date
1	First Issue	29 th October 2019

Approval Level	Authority	Name
Author	Osprey CSL	██████
Reviewer	Osprey CSL	██████

References

	Description	Hyperlinks
1	Step 1A Statement of Need	Link
2	Step 1A Assessment Meeting Presentation	Link
3	Step 1A Assessment Meeting Minutes	Link
4	Step 1B Design Principles	Link
5	Step 2A Options Development	Link
6	Step 2B Initial Options Appraisal	Link
7	Step 3B Full Options Appraisal	Link
8	Step 3B Consultation Strategy	Link
9	Step 3C Consultation Document	Link

Table of Contents

1.1	Introduction	1-1
1.2	Consultation	1-1
1.3	Summary of Consultation Responses	1-2
1.4	Categorisation of Consultation Responses and Themes	1-4
1.5	Conclusion and Next Steps	1-5
1.6	Reversion Statement.....	1-6
A1	List of Stakeholders	1-7
A1.1	Aviation Stakeholders:.....	1-7
A1.2	MRO Customer Airlines Consulted.....	1-7
A1.3	Non-Aviation Stakeholders - Cardiff Airport Consultative Committee.....	1-7
A2	Online Portal Questions	2-8
A3	Consultation Responses	3-1

1.1 Introduction

This report forms part of the document set that meets the requirements of the CAP 1616 airspace change process. Following the completion of Step 3C ‘Consultation’, this report aims to provide adequate evidence to satisfy Stage 3, Step 3D ‘Collate and Review Responses’.

The aim of the consultation was to seek stakeholder’s views solely on the publication of the existing St Athan Instrument Landing System (ILS) procedures, previously published in the publicly available Military Aeronautical Information Publication (Mil AIP), into its civilian counterpart, the UK (Aeronautical Information Publication) AIP. If the proposal is approved, there will be no physical or operational changes to the ILS procedures as a result of them being published in the UK AIP; therefore, the following elements were out of scope of the consultation:

- The path over the ground which aircraft fly;
- The slope down which aircraft descend to reach the runway;
- The number of aircraft that would use the procedure;
- The type of aircraft that would use the procedure;
- Any of the supporting Air Traffic Control (ATC) procedures;
- The size, dimensions or classification of any surrounding airspace.

1.2 Consultation

The sponsor has completed a four-week targeted consultation with relevant aviation and non-aviation stakeholders, as previously agreed by the CAA.

The Consultation Strategy (Ref 8) describes the focus of the consultation, previous engagement activities completed, the audience of the consultation and justification behind the strategy.

A total of 19 stakeholders were directly consulted, comprising the Maintenance Repair and Overhaul (MRO) companies based at St Athan and their commercial airline customers; local airspace users, ANSPs and the MOD; and representatives of the local community through the Cardiff Airport Consultative Committee. A list of stakeholders is at Annex 1.

A Consultation Document (Ref 9) for the proposed airspace change was provided to stakeholders that included a description of the current airspace, the proposed change and the impact of the proposal. The consultation began on Monday 30th September and ended on Monday 28th October 2019. It was conducted via the CAA Airspace Portal and included an overview of the proposed change, an explanation of ‘Why We Are Consulting’, together with the Consultation Document (available for download) and an online survey that allowed consultees to ‘Give Us Your Views’. A list of the questions posed in the online survey can be found in Annex 2 – Online Portal Questions.

All stakeholders were sent an email on 30th September 2019 to notify them that the consultation was open. A follow-up email was sent to all stakeholders who had not responded on 11th October 2019 and a further email, again to those who had not yet responded, was sent on 21st October 2019.

1.3 Summary of Consultation Responses

A total of 21 responses were received over the four-week consultation period:

- All 19 directly contacted stakeholders responded;
- The Vale of Glamorgan Council, who sit on the Cardiff Airport Consultative Committee, forwarded details of the consultation to their constituent Town Councils, one of whom responded;
- MOD was consulted via the DAATM and an additional response was received from the University of Wales Air Squadron (UWAS)/ No 1 Air Experience Flight (AEF).

All responses were made via the CAA Airspace Portal and none contained attachments. No feedback was sought or received through informal consultation, such as at public events, and no comments made in either private or public meetings have been taken into account in the following analysis.

As illustrated in Table 1 below, responses were received from stakeholders in each of the groups identified in paragraph 1.2, including: MROs and their customer airlines, local airspace users and ANSPs, together with representatives of the local community.

Cognisant that 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, all but one of the responses received were supportive of the proposal; the remaining response was neutral.

Response ID	Organisation	Support of Airspace Change
1	Vale of Glamorgan Tourist Association	Support
2	easyJet	Support
3	Defence Airspace & Air Traffic Management (DAATM)	Support
4	SAS	Support
5	Bristow Helicopters Ltd	Support
6	Vale of Glamorgan Council	Support
7	TUI Airways	Support
8	eCube Solutions Ltd	Support
9	Caerdav	Support
10	Corendon Dutch Airlines	Support

Response ID	Organisation	Support of Airspace Change
11	Serco	Support
12	Aeros Flight Training (Cardiff)	Support
13	Wales Air Ambulance Trading Ltd	Support
14	Bristol ATC (NATS)	Support
15	Horizon Flight Training	Support
16	NPAS	Support
17	NATS	Support
18	Llancarfan Community Council	Support
19	Barry Town Council	Neutral
20	Cardiff Airport	Support
21	University of Wales Air Squadron (UWAS)/ No 1 Air Experience Flight (AEF)	Support

Table 1 Summary of Consultation Responses

Figure 1, below, illustrates the response to the question, 'Do you or your organisation support or object to this proposal' in graphical format:

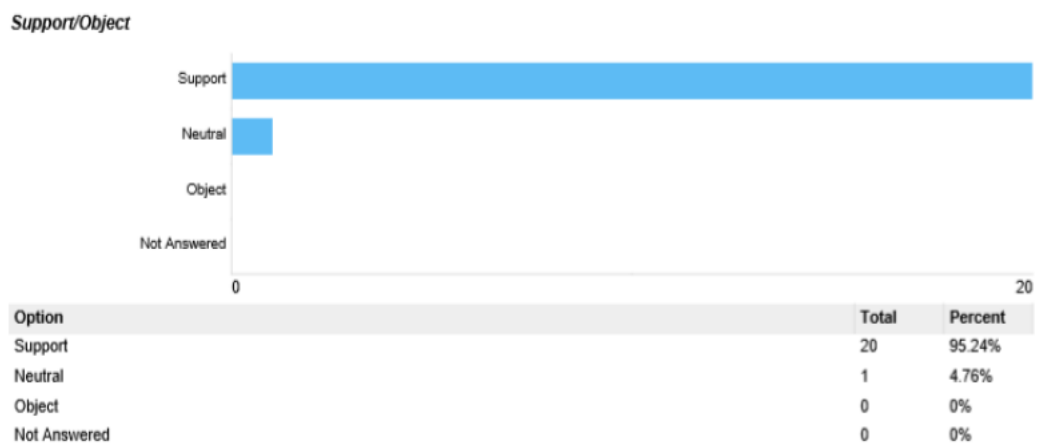


Figure 1 Responses to support/object question

1.4 Categorisation of Consultation Responses and Themes

Responses to the consultation are included in full at Annex 3, along with an allocated theme, justification that there is no impact on final proposal and any action required by the sponsor. Some comments comprised more than one element and, while there was no criticism of the consultation format itself, some responses were critical of the need to consult.

One response, from Cardiff Heliport, was identified as being outside the scope of the ACP. It concerned the proximity of the Cardiff Docks Visual Reporting Point to the Heliport and has been passed to NATS Cardiff, as the controlling authority for the airspace, for investigation and resolution.

1.4.1 Responses which may impact the Final Proposal

The analysis undertaken is proportionate to the scaled approach taken throughout the proposal and commensurate with the CAA's assessment of the change as Level 2C.

All but one of the responses received were supportive of the proposal. One response was neutral, relating to concern of any potential increase in road traffic but, as no increase in aircraft movements is anticipated if the proposal is approved, it can be assumed that neither will there be an associated increase in road traffic as a result of the proposal. No response contained new information or ideas that the sponsor believes could lead to an adaptation to the preferred design option, a new design option, or would otherwise impact the final proposal.

1.4.2 Responses which do not impact the Final Proposal

As already stated, none of the responses impact on the final proposal, apart from to support it or being neutral, but most do contain useful and relevant comments. Six themes emerge:

1. The availability of ILS procedures enhances the safety of operations;
2. The availability of ILS procedures enhances the operational planning, and therefore the commercial, attractiveness of St Athan as a location for MRO;
3. Local airspace users and ANSPs identified no negative and some positive impact of the proposal;
4. The proposal elicited no negative operational or aviation-related comments;
5. The suspension of the ILS procedures is having a significant, negative, economic impact on the local area and the region at a time of already heightened uncertainty;
6. The early reinstatement of the St Athan ILS procedures would be welcomed.

Although they do not impact on the Final Proposal, adopting the principle of transparency and employing the 'We asked, you said, we did' approach, the responses provide further supportive evidence of the benefits that will accrue if the proposal is accepted and the St Athan ILS procedures are re-introduced.

No safety issues have been identified either by the sponsor or by any consultee.

The responses from MRO airline customers confirm that the availability of ILS procedures at St Athan enhance safety and the predictability of operations, particularly in poor weather, which is important in maintenance scheduling and enhances the attractiveness of the airport to them.

The MRO companies based at St Athan themselves reinforce the view that the availability of ILS procedures enhances the predictability of operations and, without those procedures, the airport is less attractive to customers at a time of heightened economic and business uncertainty.

The availability of ILS procedures at St Athan has no negative and, in some cases, a positive impact for local airspace users. In addition, there is no negative impact for ANSPs from the proposal, or for those living in the local community.

In its response, the Vale of Glamorgan Council also acknowledges the importance of ILS procedures to commercial aircraft landing at St Athan to use the MRO facilities. The response goes on to recognise their importance to the attractiveness of the Enterprise Zone and the consequential impact on the local and regional economy if the procedures are not re-instated swiftly. The Council's Local Development Plan (LDP) 2011-2026, adopted on the 28th June 2017, identifies St Athan as a Strategic Opportunity Area in the Wales Spatial Plan (2008 update) that forms a key element in the LDP Strategy as a focus for transport and employment investment. Finally, the Council response concludes that:

“if the current suspension is not addressed quickly, it is likely to have an adverse effect on the implementation of the LDP strategy, the Enterprise Zone as well as to the local and regional economy”.

In summary, all responses are supportive of the proposal, none identify any negative impacts from its implementation, but several raise significant concerns if the proposal is not approved swiftly.

1.5 Conclusion and Next Steps

A targeted 4-week consultation has been conducted in accordance with the process agreed by the CAA. All responses support the proposal, no negative impacts have been raised and no changes have been identified that would suggest any revision to the previously submitted design is required.

If the proposal is not approved, additional costs are likely to be incurred: in scheduling by the airlines that wish to use St Athan for MRO; to the ongoing attractiveness of St Athan as an MRO destination; directly and significantly to the MRO companies based at St Athan and in turn to the wider, long-term economic aspirations of the local area and regionally. In contrast, if the proposal is approved, airlines will be able to plan and schedule arrivals to St Athan with confidence and so make it a more attractive MRO destination. The MRO companies will have less commercial uncertainty which will, in turn, help to sustain the local economy and contribute to the growth aspirations set out in the LDP.

For Stage 4 UPDATE AND SUBMIT, as only one minor change has been identified in the design of the proposal, clarification that there is no new circling approach procedure or missed approach, it is suggested that the Full Options Appraisal submitted on 27th September 2019 at Step 3B is re-submitted, with the minor change addressed, as the Final Options Appraisal.

In addition, the St Athan ILS procedures, in UK AIP format, will be submitted to the CAA by the Osprey CSL IFP team by 31st October 2019, using Osprey's existing, approved accreditation (gCAP) with associated processes. The sponsor suggests that this will complete Step 4A.

In order to progress the proposal as swiftly as possible, recognising the increased importance of the ILS procedures in the winter months, when both the MRO facilities seek to be busiest and adverse weather is more likely to have a negative impact on operations, the sponsor then plans to prepare and submit the Step 4B Formal Submission as soon as practicable.

Given the scaled nature of this Level 2C proposal and its uncontroversial passage through consultation, it is then hoped that the CAA can move to a swift and positive decision to approve the proposal, so that it can be implemented and the procedures published in the UK AIP at the earliest possible date, ideally in a single AIRAC cycle.

1.6 Reversion Statement

Should the proposal be approved and implemented, while it would be possible to revert to the pre-implementation state, this would see the withdrawal of the St Athan ILS procedures. Withdrawal of the procedures would return operations at the airport to the current state, with no instrument procedures available and would reintroduce all of the operational, and knock-on economic, uncertainties of operating at a VFR-only airport.

A1 List of Stakeholders

The consultation was most relevant to the stakeholders listed below, all of who were emailed PDF copies of the consultation material and sent links to the consultation feedback website. The list was not exclusive and, while any individual or organisation was able to submit a response, the sponsor only specifically targeted the organisations below.

A1.1 Aviation Stakeholders:

- Aeros Flight Training - Cardiff
- Caerdav, St Athan
- Cardiff Airport
- Cardiff Heliport
- DAATM and UWAS/1 AEF
- eCube, St Athan
- Horizon Flight Training & Aircraft Services
- NATS Cardiff
- 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 and constituent Town Councils
- Vale Tourism Association

A2 Online Portal Questions

1. What is your name? (Mandatory)
2. What is your email address? (Mandatory)
3. Please enter your postcode (most relevant to your response e.g. home/ work/ organisation etc). (Mandatory)
4. Are you providing a response as an individual or do you represent an organisation? (Mandatory)
5. Please note all responses will be published. Are you happy for your name to be included in the response publication? (Mandatory)
6. Do you or your organisation support or object to this proposal?
 - a. Support
 - b. Neutral
 - c. Object
7. Please provide your feedback on the proposal here. Please provide us with your feedback on the proposal. This could include any concerns that you feel have not been taken into consideration or statements of support that you may wish to make.
8. If you would like to send us a response document or related evidence, please do so here.
 - a. Please attach a copy of any documents you wish to include in support of your feedback.

A3 Consultation Responses

Response ID	Comment	Theme	Justification of no impact on final proposal	Sponsor Action
1	Having been present at the presentation at CWL, I am satisfied with the proposals.	No impact	No issue raised	Nil
2	The selection of airports for suitability are influenced by the safety and reliability that approaches / landing can be made at the selected airport. St Athan would be enhanced by the availability of the ILS facility. It enables the reliable conduct of flight operations to be planned to the airport for the purposes of delivery / re-delivery considering the UK meteorological situation in periods of the year that we wish to use the facility. An ILS is a key enabler for the type of operations that are conducted by the operators using the MRO facility.	ILS availability enhances the safety and operational attractiveness of St Athan	Support	Nil
3	No further comment.	No impact	No issue raised	Nil
4	SAS do not normally allow operation to an aerodrome without instrument approach procedure(s), hence VFR aerodromes. However, Flight Operations may grant exemption from this rule. I believe other major airlines have the same policy/rule. Therefore, on these special non-revenue delivery flights to St Athan, the absence of an instrument approach procedure is not critical	ILS availability enhances the safety and operational	Support	Nil

Response ID	Comment	Theme	Justification of no impact on final proposal	Sponsor Action
	from a regulatory perspective. However, the lack of instrument approach procedure naturally makes operations to the aerodrome more vulnerable in case of bad weather. Weather forecasts for St Athan are often varying considerably over a day making predictability whether or not a VFR landing will be possible at ETA difficult. I have several times been forced to divert to Cardiff and wait for weather improvement due to visibility and/or cloud base being below VFR landing minima at St Athan. Sometimes this has resulted in an unplanned overnight stop. Of course this causes irregularities, increased operating costs (fuel, handling fees, hotel, transportation, rebooking of tickets home etc) and delayed crew who were supposed to go back to their main base for other production the next day. I would say that an operating ILS is definitely a huge improvement to flight safety, operational stability that could affect customers' choice of MRO.	attractiveness of St Athan		
5	The Search and Rescue helicopters rarely use the St Athan ILS because the decision altitude on the Cardiff ILS is significantly lower. This provides better training and gives crews a better chance of breaking cloud before the decision altitude if the ILS is used to recover to an airfield. That said, there will be occasions when the St Athan ILS will be useful for training or to descend the aircraft without the need for an internal radar let-down offshore. With that in mind, the proposal is supported as it will allow continued use of the St Athan ILS.	Local airspace user, low impact	Support	Nil
6	The Council acknowledges the importance of ILS procedures to commercial aircraft landing at St. Athan airport to use the MRO facilities at St. Athan. It also recognises how important the ILS procedures are to the attractiveness of the Enterprise Zone and the consequential impact on the local and regional economy if they are not re-instated swiftly. It is understood that there will be	ILS availability enhances the operational and commercial	Support	Nil

Response ID	Comment	Theme	Justification of no impact on final proposal	Sponsor Action
	<p>no physical or operational changes to the ILS procedures as a result of them being published in the UK AIP. The Vale of Glamorgan Local Development Plan 2011-2026 (LDP) was adopted on the 28th June 2017. The LDP sets out the Council's strategy for future land use and development over the Plan period. The LDP can be viewed on the Council's website via the following link: https://www.valeofglamorgan.gov.uk/en/living/planning and building control/Planning/planning_policy/local_development_plan/Local-Development-Plan.aspx It should be noted that St. Athan is identified as a Strategic Opportunity Area in the Wales Spatial Plan (2008 update) and forms a key element in the LDP Strategy which reads as follows: "To promote development opportunities in Barry and the South East Zone. The St. Athan area to be a key development opportunity and Cardiff Airport a focus for transport and employment investment. Other sustainable settlements to accommodate further housing and associated development." Accordingly, the LDP allocates a 305 hectare (gross) strategic employment site in St. Athan (Policy MG9 refers) and several strategic housing sites within the St. Athan area (policy MG2 refers). Therefore, in view of the Council's growth aspirations for St. Athan in the LDP, the Council supports this proposal. If the current suspension is not addressed quickly, it is likely that to have an adverse effect on the implementation of the LDP strategy, the Enterprise Zone as well as the local and regional economy."</p>	<p>attractiveness of St Athan</p>		
7	<p>This allows St Athan airport to remain operational during poor weather, which will be a positive development for all users on the airport, especially those who rely on commercial operators to be able to land despite the weather.</p>	<p>ILS availability enhances the operational attractiveness of St Athan</p>	<p>Support</p>	<p>Nil</p>

Response ID	Comment	Theme	Justification of no impact on final proposal	Sponsor Action
8	We fully support a scaled, proportionate and accelerated application of CAP 1616. This option provides predictability for airline operators who wish to use the Airfield - without the ILS, landings are heavily dependent on favourable weather conditions – not something that can be relied up – especially over the Autumn/Winter and Spring seasons. The obvious benefits and purpose of the ILS systems is to allow pilots to descend safely and fly to St Athan when either the forecast or actual cloud base is much lower than the 2,400 feet AMSL minimum necessary for a visual approach. For some operators, non-availability of ILS procedures will eliminate an airfield from approved lists. So, having the ILS operating is essential to support the landing and subsequent servicing of these customers. Even where it is not essential - greater predictability helps all airlines in their scheduling thereby enhancing efficiencies and reducing costs. All businesses are already under pressure due to the assumed and/or unknown impact of BREXIT, and so we need to really focus on all services to accommodate the owners and operators who may choose to (or not to) fly into St Athan for the purposes of aircraft transactions and services.	ILS availability enhances the operational and commercial attractiveness of St Athan	Support	Nil
9	As previously mentioned in the proposal, we here at [REDACTED] based in St. Athan, strongly support the introduction of the ILS system to the existing airfield. We are in the process of a major turnaround of our business and one of the first questions asked is 'does the airfield have an ILS?' in order to attract new customers, we need to be able to reassure them that their aircraft will be able to land at this airfield, in the event of bad weather. The majority of our work here in the MRO is throughout the winter months when the aircraft/airlines are quieter and our customers need to plan their maintenance schedules during this period."	ILS availability enhances the operational and commercial attractiveness of St Athan	Support	Nil

Response ID	Comment	Theme	Justification of no impact on final proposal	Sponsor Action
10	Use of ILS is positive for us as a commercial carrier when using St Athan for our MRO.	ILS availability enhances the operational attractiveness of St Athan	Support	Nil
11	It is difficult to comprehend how a change of Aerodrome regulator, MAA to CAA, can have such a profound effect on a procedure designed by NATS Procedure Design 'developed to Civil Aviation Authority (CAA) approved standards', especially if all that is being considered is how the information is promulgated. I am therefore somewhat bemused as to why I am being asked to comment on whether an IAP should be published in the UK AIP. Any person associated with aviation in an operational field will be thinking, what is the issue? Having worked at St Athan since the Air Navigation Service Provision changed from being a Military provider to a Civil one in 2014, I have been involved and witnessed first-hand the frustrations and the protracted struggle to get the ILS installation and associated ILS flight procedure approved by the MAA. This was eventually approved and entered service in February 2018. It was with some dismay that those with a vested interest in the development of St Athan aerodrome resigned themselves to the fact that with effect from the 1st April 2019 the facility was to be withdrawn from service. So what had changed? The equipment was the same, the procedure design was the same, the airspace the same, the ANSP who vectors aircraft onto the ILS the same. Nothing has physically changed other than the aerodrome is now regulated by the CAA and not the MAA. I can understand that checks and balances have to be conducted to ensure that processes are in place to ensure the equipment is maintained and certified in	ILS availability enhances the operational, safety and commercial attractiveness of St Athan	Support	Nil

Response ID	Comment	Theme	Justification of no impact on final proposal	Sponsor Action
	<p>accordance with CAA regulations and that the IAP conforms to ICAO/CAA requirements etc but, having satisfied those requirements, to consult on whether it is published in the AIP appears to be a question with an obvious answer. Was the procedure and equipment less safe when it was regulated by the military? One would like to think not as aircraft passed over the south Wales population. It is bad enough having the uncertainty of Brexit but companies established at St Athan and equally important, those companies who may be considering establishing a business base at St Athan, currently do not have the assurance that their business can attract customers through their doors as the avenue to get to that door, a functioning ILS, is not available. It would appear that this consultation, if I am interpreting its aims correctly, is whether the Instrument Approach Procedure should be published in the already extant St Athan section of the UK AIP. Naturally it should- why shouldn't it? To delay the introduction of the ILS and publication of the procedure is hindering business development in South Wales. It should not be a protracted process to approve the re-introduction into service of the St Athan ILS. It is difficult to see how the Competent Authority can justify not approving an unchanged procedure, unless on the grounds of safety. I do not believe there are any safety issues.</p>			
12	<p>In general, this seems to be an easy change from one AIP to another. There doesn't seem to be any airspace change that will directly affect the running of the flying school as all the current procedures are simply being moved (No airspace changes that will affect exit/entry routes as well as Cardiff approach/missed approach procedures etc). Overall, we are very happy with the proposal.</p>	Local airspace user, no impact	Support	Nil

Response ID	Comment	Theme	Justification of no impact on final proposal	Sponsor Action
13	Given that there is no change in procedure, no adverse operational impact anticipated with this change in publication status.	Local ANSP, no impact	Support	Nil
14	We only have the one concern. With regards to traffic flying over the Heliport. We have a concern about the Cardiff Docks VRPs proximity to the Heliport. The Airport already uses Lavernock Point and Wenvoe mast as adequate VRP's. We can't see why the Cardiff Docks VRP is needed when so close to the Heliport and the procedure often finds fixed wing traffic below 1000ft posing a risk to our traffic and a danger for student pilots in the circuit (750 ft AGL). Despite the clearance given to aircraft ""cleared via the Cardiff Docks VRP not above 1500ft"" but they are dropping to below our circuit height of 750ft. We have had occasions when the [REDACTED] that are based at St Athan have flown straight over the Heliport at low level and speed with total disregard for air safety. Perhaps when aircraft using the Cardiff Docks VRP are contacted they could be told Not below 1000ft and not above 1500ft."	Not relevant to ACP	Support	Issue passed to relevant authority
15	Horizon Flight Training are based on Saint Athan airfield and would welcome the ILS facility being up and running as this would prove an asset to school. We would be able to offer instrument training on the home airfield along with offering an added insurance to any pilot that has an instrument rating that they could attempt a procedural approach in declining visibility.	Local airspace user, positive impact	Support	Nil
16	The National Police Air Service operates a 24 hr service from St Athan Airfield. The reintroduction of the ILS at St Athan will have no adverse effect on its service delivery as Police Air Support is predominately a VFR operation. There is scope for NPAS crews to operate under IFR and NPAS	Local airspace user, positive impact	Support	Nil

Response ID	Comment	Theme	Justification of no impact on final proposal	Sponsor Action
	would support an ILS at St Athan, which would be an option for recovery back to Base.			
17	NATS Cardiff support the proposal to provide ILS approaches to Runway 25 at St Athan. This type of approach will provide greater surety of traffic position, compared to a visual approach along with an enhanced capability to complete a successful approach in weather minima lower than the procedures utilised today. It is noted that there is no mention of tracks over the ground for runway 07 (the procedures detail a circling approach) or of missed approach procedures.	Local ANSP, positive impact No change to procedures	Support	Observation addressed in Final Options Appraisal
18	As there are no proposed changes to the existing procedures Members of this Council have no concerns or observations.	No impact	No issue raised	Nil
19	The Town Council's Consultation Working Party considered the Consultation Document St Athan ILS ACP Step 3A at their meeting held on 24 October 2019. Members noted that they would only have concerns if the level of traffic to and from the airport along the A4226 and A4050 were to increase as a result of the changes proposed in the consultation document.	No impact	No increase in number of aircraft planned if proposal accepted, therefore no increase in road traffic is predicted	Nil

Response ID	Comment	Theme	Justification of no impact on final proposal	Sponsor Action
20	Within the St Athan ILS ACP – Step 2a – Options Development document, A2.1 and A2.2 show the legacy ILS ‘plates’, which include a Circling minima. Is a Circling approach included within the procedures for this proposal?	No change to procedures	Support	Observation addressed in Final Options Appraisal
21	<p>UWAS/1AEF are VERY strongly in favour of this proposal. Having been a major proponent of ensuring the ILS at St Athan was published in the Mil AIP, and then having used the procedure until its withdrawal in Apr 19, we have a strong interest in seeing its resumption as soon as possible in order to return to the efficiency level lost by that removal.</p> <p>While the ILS is not used for instrument flight training (which other than sufficient approaches for St Athan based aircrew to familiarise themselves/remain current in 'home base' procedures, is carried out at Cardiff or other airfields e.g. Yeovilton as the closest military locn), the lack of an instrument recovery procedure has had a major impact on the ability to launch for general training sorties by limiting UWAS/1AEF to flying only when a VFR recovery is possible. As all qualified instructors at the Unit hold instrument ratings, with an instrument recovery system back in place, sorties may again be planned in conditions where an instrument recovery might be required thereby significantly increasing the number of days suitable to complete Unit tasks. As such, the availability of the ILS is a major factor in management of risk for UWAS/1AEF operations at St Athan. In addition, the sea track inherent in a significant proportion of approaches to Cardiff means that limitations are placed by our operating authority on the occasions when a single-engine aircraft may be planned to fly a student on such a pattern; the ILS approach to St Athan does not have this limitation as it is effectively 'feet</p>	Local airspace user, positive impact	Support	Nil

Response ID	Comment	Theme	Justification of no impact on final proposal	Sponsor Action
	<p>dry' throughout and so deemed suitable for occasional recoveries when necessary at completion of a normal training sortie.</p> <p>Therefore, UWAS/1AEF would wish to see the procedures for St Athan's ILS published in the UK AIP as soon as possible in order to resume operations with enhanced safety of recovery and at the efficiency levels enjoyed prior to the withdrawal of the ILS in Apr 19.</p>			