Section 2: Feedback received to Design Principles stakeholder review

RSP | Manston Airport

Manston Airport Airspace Design and Procedures

Design Principle Stakeholder Review

Table of Contents

1. Airspace Design and Procedures

1.1 Introduction

RiverOak Strategic Partners Limited (RSP) would like to thank all stakeholders who have engaged with the Airspace Design and Procedures process so far and for the feedback provided by various representative bodies. This has helped us to derive a comprehensive list of potential Design Principles that reflect the statements made during focus group events and from questionnaires received.

This document has been prepared to share the list of Design Principles developed during recent engagement activities. We now need your help to provide further comments on the list to help us understand which Design Principles are most important to your organisations.

1.2 Background

RSP is proposing to redevelop and reopen Manston Airport as a successful hub for international air freight which also offers passenger travel, executive travel and aircraft engineering services. The airport would be comprehensively rebuilt and upgraded, including the provision of extensive cargo aircraft stands. The proposed development is subject to a Development Consent Order (DCO) application submitted by RSP to the government Planning Inspectorate (PINS) in July 2019.

In addition to the DCO, RSP will need to submit an application to the CAA to establish the procedures required to enable safe and efficient operations to and from the airport in accordance with the Civil Aviation Publication (CAP) 1616 – *Airspace Design: Guidance on the regulatory process for changing airspace design including community engagement requirements*.

The guidance in CAP 1616 sets out the framework for the 7 stages of the process and the activities that must be undertaken, including engagement and consultation requirements. We have now completed the initial phase of our engagement (part of Stage 1, CAP 1616) to establish our Design Principles for the introduction of Instrument Flight Procedures (IFP) at Manston Airport.

The process to gain approval for procedures is separate to the DCO process. We are only concerned with the Design Principles that will inform the design of the procedures as part of the CAP 1616 process.

[1] CAA Civil Aviation Publication (CAP) 1711

1.3 Development Methodology

All airspace changes within the UK must follow the regulatory process described in CAP 1616. The process was developed to ensure a high degree of transparency and adequate levels of two-way engagement with all relevant stakeholders, including local communities. The early stage of the process involves the development of Design Principles and the activities shown below have helped us to determine the initial list of potential Design Principles detailed later in Section 2:

- Design Principles Questionnaire – Aviation Stakeholders
- Design Principles Questionnaire – Non-Aviation Stakeholders
- Focus Groups

In early October, questionnaires were distributed to specialist aviation and technical groups, local authorities, parishes and politicians representing their organisations and communities, to seek their feedback on a number of topics related to airspace design. In addition, three focus groups were held in November where aviation and non-aviation stakeholders were offered the opportunity to discuss the proposed introduction of procedures.

The questionnaire responses have been analysed and along with the comments and discussion recorded during the focus groups, have helped us to develop a list of potential Design Principles which will serve as a qualitative framework against which the different design options that we produce, will be evaluated. It is therefore important that your views have been accurately captured.

1.4 Highest Priority Design Principles

Any changes to airspace arrangements must maintain high standards of safety. This is the main priority of the CAA in accordance with its statutory duties set out in Section 70(1) of the Transport Act 2000. Therefore, the overriding Design Principle against which the design options will be developed will be as follows:

- **SAFETY**

  Procedures must be designed to meet acceptable levels of flight safety

  The CAA's Airspace Modernisation Strategy (AMS) and the Masterplan that NERL has been commissioned (jointly by the Department for Transport and the CAA) to produce will affect any airspace and procedures that Manston Airport will be proposing to introduce. It is important that the impact of the AMS and the Masterplan work on this airspace change is included. Any design work will also take into account the change in vertical reference caused by the transition altitude, particularly with interactions with other airports. Therefore, subject to the overriding Design Principle of Safety, the highest priority Design Principle for this airspace change will be as follows:

- **HARMONISATION**

  Design options must accord with the CAA's published Airspace Modernisation Strategy (CAP 1711) and any current or future plans associated with it.

1.5 Stakeholder Review Requirements

Section 2 - Review of Design Principles

Please take a look at the potential Design Principles listed in Table 1 below. For each of the Design Principles listed, we would like you to state whether or not you agree that the statement constitutes a Design Principle. If you do not agree, please provide detail in the comment box provided.

In addition, we would like you to rank the Design Principles according to your organisation's priorities. Please rank the Design Principles from 1 (Highest priority) to 6 (Lowest priority). If you feel any of the Design Principles are not applicable to your organisation, please mark it as '0'. Please add any amplifying comments you wish to include, also in the comments box.

Please note that this list, and your subsequent prioritisation, does not include the highest priority Design Principles (SAFETY and HARMONISATION) that have been described in paragraph 1.4 above.

Please complete Table 2 to provide any additional comments that you feel have not been considered, or suggest any additional Design Principles you feel ought to be considered by RSP for Manston Airport.

Section 3 – Potential Design Principles Not Taken Forward

Table 3 articulates some other potential Design Principles that have not been included in the list of Design Principles under consideration. Please make any comments relating to this list in the space provided in Table 3.

Design Principles are used to help us identify design options at the next stage in the CAP 1616 process. By prioritising Design Principles now, we will be able to develop design options that best meet the Principles identified as the highest priorities while also maximising other potential benefits.

1.6 How to Respond

Please save the file that includes your responses as a Microsoft word document and attach to an email to the following address: manstonairspace@communityrelations.co.uk

In addition to the word file, we will accept scanned, hand-written responses as long as they are legible, or email responses that clearly identify the Design Principle or question to which your response relates.

It is important that email responses clearly show your name, representative organisation and contact details; this will allow us to cross-refer your response to the emails we send out.

We will also accept legible postal responses to Free Post 1616 by the deadline date below:

Please respond by mid-day Friday 17th January 2020.

[1] A single coordinated UK airspace design and implementation masterplan for airspace changes up to 2040.

[2] NERL – NATS En-Route Ltd - the sole provider of civilian en-route air traffic control over the UK.

1.7 Next Steps

The CAP 1616 process relates to gaining approval for airspace and procedures only for Manston Airport.

Completion of Stage 1 – Design Principles

The responses you now provide will help us to refine the Design Principles before we submit them to the CAA for its review and approval. This is known as the CAA's DEFINE Gateway and marks the completion of Stage 1 of the CAP 1616 airspace change process for Manston Airport.

Stage 2 – Design Options

Once the Design Principles are approved by the CAA, we will then progress to Stage 2 of the CAP 1616 process, where we will commence detailed airspace and procedure design work to develop design options.
Further engagement activities will take place during this stage to seek your views on the design options before they are submitted to the CAA for their appraisal. This is known as the CAA's DEVELOP and ASSESS Gateway currently planned for mid-2020.

Engagement during Stage 1 and 2 is for representatives of specialist aviation and local authority bodies who represent their local organisations and communities.

Stage 3 – Consultation on Design Options

We will be consulting widely with residents, businesses, communities, the public and other stakeholders at Stage 3 (Consult) later in 2020 or early 2021 when detailed design options have been developed.

RSP will ensure any feedback given during Stages 1 and 2 will be collated and included in a consultation report alongside feedback at Stage 3. The consultation report will be part of RSP's airspace change and procedures proposal submitted to the CAA for approval.

Documentation relating to the CAP 1616 process is published on the CAA's portal.

2. Review of Design Principles

2.1 Your Responses

Please complete

Table and **Error! Reference source not found.** below in line with the guidance provided in Section **Error! Reference source not found.**.
Please use as much space as you require, the size of the response box will expand as you type your response.

Please complete the following:

Representative Organisation:
Natural England

Table 1 – Design Principles Review and Prioritisation

Design Principle	Rationale	Do you agree this is a Design Principle? (Yes or No)	How would you rank this Design Principle as a priority? (1 = Highest to 6 = Lowest or 0)
Procedures should be designed to minimise the impact of noise below 7,000 ft.	One of the Government's key environmental objectives is to limit and, where possible, reduce the number of people in the UK significantly affected by adverse impacts from aircraft noise. Current government policy states that below 7,000 ft., the noise impact of aviation on those on the ground takes greater precedence than the management of aircraft emissions.	Yes	2
Comments:			

Design Principle	Rationale	Do you agree this is a Design Principle? (Yes or No)	How would you rank this Design Principle as a priority? (1 = Highest to 6 = Lowest or 0)
Procedures should be designed that minimise aircraft emissions to reduce air pollution.	Improving environmental performance by reducing emissions is an outcome that the CAA's AMS is expected to deliver. More direct routes and the use of continuous climbs and descents are some of the measures that can be employed to reduce fuel burn, therefore reducing emissions per flight.	Yes	3
Comments:			
Where practicable, designs should seek to minimise the impact of noise on particularly sensitive areas.	The new routes should be designed to protect, as much as practicable, areas that are sensitive to noise. These may include sites of care or education, tranquil or rural areas that are used by the public for recreational purposes and cultural or historical assets. Avoiding overflight of all of these locations in every case would be impractical but we will endeavour to achieve this where possible.	Yes	1
Comments: **Natural England advised that there would be no adverse effect on the integrity of the Thanet Coast and Sandwich Bay Special Protection Area (SPA) under the Habitats Regulations during the DCO examination based on flightpaths being as presented in the Examination. If they are moved closer to Pegwell Bay, this will invalidate the assessment and invalidate the basis on which the Secretary of State is considering the application.**			

Design Principle	Rationale	Do you agree this is a Design Principle? (Yes or No)	How would you rank this Design Principle as a priority? (1 = Highest to 6 = Lowest or 0)
Procedures should be designed, where possible, to minimise the number of track miles flown.	In order to minimise emissions and to optimise operational efficiencies, designs should where possible, minimise the number of track miles flown.	Yes	4
Comments:			
Designs should minimise the impact on other airspace users in the local area.	The airspace and procedure design should aim to address the needs of all air traffic operating in the local area. New routes must take into account General Aviation (Sports & Recreation) operations at local airfields and avoid any unnecessary impact. Access to airspace should be ensured, especially for military fixed wing and rotary aircraft to meet defence operational and training requirements.		
Comments:			
Designs should where possible, make provision for multiple routes that can be used to spread the noise burden more equitably.	Airspace design should make provision for multiple arrival and departure routes to spread the burden of over-flight more equitably between communities.	No	

Design Principle	Rationale	Do you agree this is a Design Principle? (Yes or No)	How would you rank this Design Principle as a priority? (1 = Highest to 6 = Lowest or 0)
Comments: **See comments above. It is imperative that the flightpaths are not altered from those that were assessed during the DCO examination, otherwise the conclusions reached are invalidated. And any consent that might be given will be unsafe legally.**			

Table 2 – Additional Comments

If there are any other areas of concern that you feel have not been considered, please provide additional comments below.
Comments:
Are there other Design Principles not included in the list that you feel should be considered as candidates for the final shortlist? If so, please provide your comments.
Comments: **The design must follow that presented for the DCO application.**

3 Potential Design Principles Not Taken Forward

3.1 Potential Design Principles

Error! Reference source not found. below articulates some potential Design Principles that have also been developed as a result of the feedback received from questionnaires and the focus group meetings. However, these have not been included in the list of Design Principles shown in

Table above for your review for the reasons indicated. If you wish to make any comments relating to this list, please do so in the space provided. Please use as much space as you require, the size of the response box will expand as you type your response.

Table 2 – Potential Design Principles Not Taken Forward

Potential Design Principle	Reasons for not Including
Routes should, where possible, be designed to be PANS-OPS compliant	The new routes will be designed, where possible, so that they comply with the internationally agreed criteria set down in the International Civil Aviation Organisation (ICAO) document PANS-OPS 8168 Volume 2 – *Construction of Visual and Instrument Flight Procedures*. Any deviation from the criteria set down in PANS-OPS would require Manston Airport to produce a robust safety case to justify why the designs are not compliant, before they can be approved by the CAA. Manston Airport considers that this is a safety-related principle and as such, will be considered under the Design Principle SAFETY.
Comments:	

Potential Design Principle	Reasons for not Including
Routes should be chosen to minimise the flight distance over land and maximise distance over the sea to reduce the impact of noise and emissions	Consideration of the impact of noise and emissions has already been included as Design Principles. Manston Airport is required to produce a comprehensive list of route designs at Stage 2 of the CAP 1616 process and this list will include options that minimise the time spent overland by designing tracks that route over the sea as much as possible. As a result, this is considered to be a design option, rather than a Design Principle, and will be considered at the next step of the process.
Comments:	
There should be no overflying of Ramsgate	Given the location of Manston Airport in relation to the town of Ramsgate, it would not be possible to design procedures to the east of the airport that completely avoids any overflight of the town. However, designs will seek to minimise the impact of noise and emissions over the town in line with the Design Principles above. Manston Airport is also planning to introduce operational procedures (a noise preferential runway system) to minimise the impact on Ramsgate.
Comments:	
Any new airspace should be the minimum volume necessary	At this stage, Manston Airport is not planning on introducing any new airspace other than an Aerodrome Traffic Zone (ATZ). Notwithstanding this, the provision of regulated airspace to protect traffic operating at Manston Airport is a potential design option, rather than a Design Principle. Any requirement to introduce additional Controlled Airspace (CAS) would be considered under the Design Principle SAFETY.
Comments:	

Potential Design Principle	Reasons for not Including
Consider the Flexible Use of Airspace	Any revised airspace structure should be adaptable to minimise the impact on other airspace users. Manston Airport assesses that this could be considered as a potential design option relating to the type of CAS required to protect traffic operating at Manston Airport. As previously stated, this will be considered under the Design Principle SAFETY.
Comments:	
Any new airspace should facilitate fair access to all airspace users.	Any regulatory change or airspace amendment should continue to allow fair access to the airspace for all aviation users. Manston Airport is not currently planning on introducing any regulated airspace to protect traffic operating from the airport, but should this be required, consideration of fair access will be considered under the Design Principle that seeks to minimise the impact on other airspace users.
Comments:	

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Manston Airport Airspace Design and Procedures

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1. Airspace Design and Procedures

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2. Review of Design Principles

2.1 Your Responses

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Please complete the following:

Representative Organisation:
Ramsgate Town Council

Table 1 – Design Principles Review and Prioritisation

Design Principle	Rationale	Do you agree this is a Design Principle? (Yes or No)	How would you rank this Design Principle as a priority? (1 = Highest to 6 = Lowest or 0)
Procedures should be designed to minimise the impact of noise below 7,000 ft.	One of the Government's key environmental objectives is to limit and, where possible, reduce the number of people in the UK significantly affected by adverse impacts from aircraft noise. Current government policy states that below 7,000 ft., the noise impact of aviation on those on the ground takes greater precedence than the management of aircraft emissions.	Yes	1
Comments: Ramsgate Town Council's position is to oppose any overflying of Ramsgate. Because of the proximity of the 40 thousand plus Ramsgate residents to the runway and flight path, aircraft would necessarily overfly at well below 7000 ft. We consider this unacceptable.			

Design Principle	Rationale	Do you agree this is a Design Principle? (Yes or No)	How would you rank this Design Principle as a priority? (1 = Highest to 6 = Lowest or 0)
Procedures should be designed that minimise aircraft emissions to reduce air pollution.	Improving environmental performance by reducing emissions is an outcome that the CAA's AMS is expected to deliver. More direct routes and the use of continuous climbs and descents are some of the measures that can be employed to reduce fuel burn, therefore reducing emissions per flight.	Yes	2
Comments: Ramsgate Town Council's position is to oppose any overflying of Ramsgate. Because of the proximity of the 40 thousand plus Ramsgate residents to the runway and flight path we don't believe more direct routes or use of continuous climbs would reduce air pollution over the town. They may actually increase noise and pollution on take-off. However, in other circumstances the general principle of reducing emissions is supported.			
Where practicable, designs should seek to minimise the impact of noise on particularly sensitive areas.	The new routes should be designed to protect, as much as practicable, areas that are sensitive to noise. These may include sites of care or education, tranquil or rural areas that are used by the public for recreational purposes and cultural or historical assets. Avoiding overflight of all of these locations in every case would be impractical but we will endeavour to achieve this where possible.	yes	2
Comments: Ramsgate seeks to regenerate itself through its attractiveness as a place to live, work and visit. It is imperative that its 3 secondary and 8 primary schools, its extensive conservation area and numerous listed buildings, its beaches, parks and open spaces are protected from overflying.			
Procedures should be designed, where possible, to minimise the number of track miles flown.	In order to minimise emissions and to optimise operational efficiencies, designs should where possible, minimise the number of track miles flown.	yes	3

Design Principle	Rationale	Do you agree this is a Design Principle? (Yes or No)	How would you rank this Design Principle as a priority? (1 = Highest to 6 = Lowest or 0)
Comments: Good as a general principle, but unlikely to affect Ramsgate			
Designs should minimise the impact on other airspace users in the local area.	The airspace and procedure design should aim to address the needs of all air traffic operating in the local area. New routes must take into account General Aviation (Sports & Recreation) operations at local airfields and avoid any unnecessary impact. Access to airspace should be ensured, especially for military fixed wing and rotary aircraft to meet defence operational and training requirements.	yes	6
Comments:			
Designs should where possible, make provision for multiple routes that can be used to spread the noise burden more equitably.	Airspace design should make provision for multiple arrival and departure routes to spread the burden of over-flight more equitably between communities.	yes	5
Comments: Good as a general principle, but unlikely to affect Ramsgate			

Table 2 – Additional Comments

If there are any other areas of concern that you feel have not been considered, please provide additional comments below.
Comments: Ramsgate contains areas of severe deprivation, with many people suffering severe stress and health effects including mental health and lung conditions. Avoiding overflying these areas should be included as a priority.
Are there other Design Principles not included in the list that you feel should be considered as candidates for the final shortlist? If so, please provide your comments.
Comments: Ramsgate Town Council considers the applicant's consultation to date whole inadequate considering the possible impact on residents and various interested parties in Ramsgate. The inclusion of extensive aviation industry representatives and representatives from parish councils far and wide across Kent effectively dilutes the impact of the one representative from Ramsgate. This is not acceptable.

3 Potential Design Principles Not Taken Forward

3.1 Potential Design Principles

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Table above for your review for the reasons indicated. If you wish to make any comments relating to this list, please do so in the space provided. Please use as much space as you require, the size of the response box will expand as you type your response.

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Potential Design Principle	Reasons for not Including
Routes should, where possible, be designed to be PANS-OPS compliant	The new routes will be designed, where possible, so that they comply with the internationally agreed criteria set down in the International Civil Aviation Organisation (ICAO) document PANS-OPS 8168 Volume 2 – *Construction of Visual and Instrument Flight Procedures*. Any deviation from the criteria set down in PANS-OPS would require Manston Airport to produce a robust safety case to justify why the designs are not compliant, before they can be approved by the CAA. Manston Airport considers that this is a safety-related principle and as such, will be considered under the Design Principle SAFETY.
Comments:	

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Routes should be chosen to minimise the flight distance over land and maximise distance over the sea to reduce the impact of noise and emissions	Consideration of the impact of noise and emissions has already been included as Design Principles. Manston Airport is required to produce a comprehensive list of route designs at Stage 2 of the CAP 1616 process and this list will include options that minimise the time spent overland by designing tracks that route over the sea as much as possible. As a result, this is considered to be a design option, rather than a Design Principle, and will be considered at the next step of the process.
Comments:	
There should be no overflying of Ramsgate	Given the location of Manston Airport in relation to the town of Ramsgate, it would not be possible to design procedures to the east of the airport that completely avoids any overflight of the town. However, designs will seek to minimise the impact of noise and emissions over the town in line with the Design Principles above. Manston Airport is also planning to introduce operational procedures (a noise preferential runway system) to minimise the impact on Ramsgate.
Comments: Ramsgate Town Council disagrees; it would obviously be possible not to use the eastern approach at all, except in emergencies, just inconvenient to the operator to schedule take offs and landings accordingly.	
Any new airspace should be the minimum volume necessary	At this stage, Manston Airport is not planning on introducing any new airspace other than an Aerodrome Traffic Zone (ATZ). Notwithstanding this, the provision of regulated airspace to protect traffic operating at Manston Airport is a potential design option, rather than a Design Principle. Any requirement to introduce additional Controlled Airspace (CAS) would be considered under the Design Principle SAFETY.
Comments:	

Potential Design Principle	Reasons for not Including
Consider the Flexible Use of Airspace	Any revised airspace structure should be adaptable to minimise the impact on other airspace users. Manston Airport assesses that this could be considered as a potential design option relating to the type of CAS required to protect traffic operating at Manston Airport. As previously stated, this will be considered under the Design Principle SAFETY.
Comments:	
Any new airspace should facilitate fair access to all airspace users.	Any regulatory change or airspace amendment should continue to allow fair access to the airspace for all aviation users. Manston Airport is not currently planning on introducing any regulated airspace to protect traffic operating from the airport, but should this be required, consideration of fair access will be considered under the Design Principle that seeks to minimise the impact on other airspace users.
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The guidance in CAP 1616 sets out the framework for the 7 stages of the process and the activities that must be undertaken, including engagement and consultation requirements. We have now completed the initial phase of our engagement (part of Stage 1, CAP 1616) to establish our Design Principles for the introduction of Instrument Flight Procedures (IFP) at Manston Airport.

The process to gain approval for procedures is separate to the DCO process. We are only concerned with the Design Principles that will inform the design of the procedures as part of the CAP 1616 process.

[1] CAA Civil Aviation Publication (CAP) 1711

1.3 Development Methodology

All airspace changes within the UK must follow the regulatory process described in CAP 1616. The process was developed to ensure a high degree of transparency and adequate levels of two-way engagement with all relevant stakeholders, including local communities. The early stage of the process involves the development of Design Principles and the activities shown below have helped us to determine the initial list of potential Design Principles detailed later in Section 2:

- Design Principles Questionnaire – Aviation Stakeholders
- Design Principles Questionnaire – Non-Aviation Stakeholders
- Focus Groups

In early October, questionnaires were distributed to specialist aviation and technical groups, local authorities, parishes and politicians representing their organisations and communities, to seek their feedback on a number of topics related to airspace design. In addition, three focus groups were held in November where aviation and non-aviation stakeholders were offered the opportunity to discuss the proposed introduction of procedures.

The questionnaire responses have been analysed and along with the comments and discussion recorded during the focus groups, have helped us to develop a list of potential Design Principles which will serve as a qualitative framework against which the different design options that we produce, will be evaluated. It is therefore important that your views have been accurately captured.

1.4 Highest Priority Design Principles

Any changes to airspace arrangements must maintain high standards of safety. This is the main priority of the CAA in accordance with its statutory duties set out in Section 70(1) of the Transport Act 2000. Therefore, the overriding Design Principle against which the design options will be developed will be as follows:

- **SAFETY**

  Procedures must be designed to meet acceptable levels of flight safety

  The CAA's Airspace Modernisation Strategy (AMS) and the Masterplan that NERL has been commissioned (jointly by the Department for Transport and the CAA) to produce will affect any airspace and procedures that Manston Airport will be proposing to introduce. It is important that the impact of the AMS and the Masterplan work on this airspace change is included. Any design work will also take into account the change in vertical reference caused by the transition altitude, particularly with interactions with other airports. Therefore, subject to the overriding Design Principle of Safety, the highest priority Design Principle for this airspace change will be as follows:

- **HARMONISATION**

  Design options must accord with the CAA's published Airspace Modernisation Strategy (CAP 1711) and any current or future plans associated with it.

1.5 Stakeholder Review Requirements

Section 2 - Review of Design Principles

Please take a look at the potential Design Principles listed in Table 1 below. For each of the Design Principles listed, we would like you to state whether or not you agree that the statement constitutes a Design Principle. If you do not agree, please provide detail in the comment box provided.

In addition, we would like you to rank the Design Principles according to your organisation's priorities. Please rank the Design Principles from 1 (Highest priority) to 6 (Lowest priority). If you feel any of the Design Principles are not applicable to your organisation, please mark it as '0'. Please add any amplifying comments you wish to include, also in the comments box.

Please note that this list, and your subsequent prioritisation, does not include the highest priority Design Principles (SAFETY and HARMONISATION) that have been described in paragraph 1.4 above.

Please complete Table 2 to provide any additional comments that you feel have not been considered, or suggest any additional Design Principles you feel ought to be considered by RSP for Manston Airport.

Section 3 – Potential Design Principles Not Taken Forward

Table 3 articulates some other potential Design Principles that have not been included in the list of Design Principles under consideration. Please make any comments relating to this list in the space provided in Table 3.

Design Principles are used to help us identify design options at the next stage in the CAP 1616 process. By prioritising Design Principles now, we will be able to develop design options that best meet the Principles identified as the highest priorities while also maximising other potential benefits.

1.6 How to Respond

Please save the file that includes your responses as a Microsoft word document and attach to an email to the following address: manstonairspace@communityrelations.co.uk

In addition to the word file, we will accept scanned, hand-written responses as long as they are legible, or email responses that clearly identify the Design Principle or question to which your response relates.

It is important that email responses clearly show your name, representative organisation and contact details; this will allow us to cross-refer your response to the emails we send out.

We will also accept legible postal responses to Free Post 1616 by the deadline date below:

Please respond by mid-day Friday 17th January 2020.

[1] A single coordinated UK airspace design and implementation masterplan for airspace changes up to 2040.

[2] NERL – NATS En-Route Ltd - the sole provider of civilian en-route air traffic control over the UK.

1.7 Next Steps

The CAP 1616 process relates to gaining approval for airspace and procedures only for Manston Airport.

Completion of Stage 1 – Design Principles

The responses you now provide will help us to refine the Design Principles before we submit them to the CAA for its review and approval. This is known as the CAA's DEFINE Gateway and marks the completion of Stage 1 of the CAP 1616 airspace change process for Manston Airport.

Stage 2 – Design Options

Once the Design Principles are approved by the CAA, we will then progress to Stage 2 of the CAP 1616 process, where we will commence detailed airspace and procedure design work to develop design options.
Further engagement activities will take place during this stage to seek your views on the design options before they are submitted to the CAA for their appraisal. This is known as the CAA's DEVELOP and ASSESS Gateway currently planned for mid-2020.

Engagement during Stage 1 and 2 is for representatives of specialist aviation and local authority bodies who represent their local organisations and communities.

Stage 3 – Consultation on Design Options

We will be consulting widely with residents, businesses, communities, the public and other stakeholders at Stage 3 (Consult) later in 2020 or early 2021 when detailed design options have been developed.

RSP will ensure any feedback given during Stages 1 and 2 will be collated and included in a consultation report alongside feedback at Stage 3. The consultation report will be part of RSP's airspace change and procedures proposal submitted to the CAA for approval.

Documentation relating to the CAP 1616 process is published on the CAA's portal.

2. Review of Design Principles

2.1 Your Responses

Please complete

Table and **Error! Reference source not found.** below in line with the guidance provided in Section **Error! Reference source not found.**. Please use as much space as you require, the size of the response box will expand as you type your response.

Please complete the following:

Representative Organisation:
Rochester Airport Limited (EGTO)

Table 1 – Design Principles Review and Prioritisation

Design Principle	Rationale	Do you agree this is a Design Principle? (Yes or No)	How would you rank this Design Principle as a priority? (1 = Highest to 6 = Lowest or 0)
Procedures should be designed to minimise the impact of noise below 7,000 ft.	One of the Government's key environmental objectives is to limit and, where possible, reduce the number of people in the UK significantly affected by adverse impacts from aircraft noise. Current government policy states that below 7,000 ft., the noise impact of aviation on those on the ground takes greater precedence than the management of aircraft emissions.	Yes	0
Comments:			

Design Principle	Rationale	Do you agree this is a Design Principle? (Yes or No)	How would you rank this Design Principle as a priority? (1 = Highest to 6 = Lowest or 0)
Procedures should be designed that minimise aircraft emissions to reduce air pollution.	Improving environmental performance by reducing emissions is an outcome that the CAA's AMS is expected to deliver. More direct routes and the use of continuous climbs and descents are some of the measures that can be employed to reduce fuel burn, therefore reducing emissions per flight.	Yes	0
Comments:			
Where practicable, designs should seek to minimise the impact of noise on particularly sensitive areas.	The new routes should be designed to protect, as much as practicable, areas that are sensitive to noise. These may include sites of care or education, tranquil or rural areas that are used by the public for recreational purposes and cultural or historical assets. Avoiding overflight of all of these locations in every case would be impractical but we will endeavour to achieve this where possible.	Yes	0
Comments:			
Procedures should be designed, where possible, to minimise the number of track miles flown.	In order to minimise emissions and to optimise operational efficiencies, designs should where possible, minimise the number of track miles flown.	Yes	0

Design Principle	Rationale	Do you agree this is a Design Principle? (Yes or No)	How would you rank this Design Principle as a priority? (1 = Highest to 6 = Lowest or 0)
Comments:			
Designs should minimise the impact on other airspace users in the local area.	The airspace and procedure design should aim to address the needs of all air traffic operating in the local area. New routes must take into account General Aviation (Sports & Recreation) operations at local airfields and avoid any unnecessary impact. Access to airspace should be ensured, especially for military fixed wing and rotary aircraft to meet defence operational and training requirements.	Yes	2
Comments:			
Designs should where possible, make provision for multiple routes that can be used to spread the noise burden more equitably.	Airspace design should make provision for multiple arrival and departure routes to spread the burden of over-flight more equitably between communities.	Yes	0
Comments:			

Table 2 – Additional Comments

If there are any other areas of concern that you feel have not been considered, please provide additional comments below.
Comments:
Are there other Design Principles not included in the list that you feel should be considered as candidates for the final shortlist? If so, please provide your comments.
Comments:

3 Potential Design Principles Not Taken Forward

3.1 Potential Design Principles

Error! Reference source not found. below articulates some potential Design Principles that have also been developed as a result of the feedback received from questionnaires and the focus group meetings. However, these have not been included in the list of Design Principles shown in

Table above for your review for the reasons indicated. If you wish to make any comments relating to this list, please do so in the space provided. Please use as much space as you require, the size of the response box will expand as you type your response.

Table 2 – Potential Design Principles Not Taken Forward

Potential Design Principle	Reasons for not Including
Routes should, where possible, be designed to be PANS-OPS compliant	The new routes will be designed, where possible, so that they comply with the internationally agreed criteria set down in the International Civil Aviation Organisation (ICAO) document PANS-OPS 8168 Volume 2 – *Construction of Visual and Instrument Flight Procedures*. Any deviation from the criteria set down in PANS-OPS would require Manston Airport to produce a robust safety case to justify why the designs are not compliant, before they can be approved by the CAA. Manston Airport considers that this is a safety-related principle and as such, will be considered under the Design Principle SAFETY.
Comments: Agree	

Potential Design Principle	Reasons for not Including
Routes should be chosen to minimise the flight distance over land and maximise distance over the sea to reduce the impact of noise and emissions	Consideration of the impact of noise and emissions has already been included as Design Principles. Manston Airport is required to produce a comprehensive list of route designs at Stage 2 of the CAP 1616 process and this list will include options that minimise the time spent overland by designing tracks that route over the sea as much as possible. As a result, this is considered to be a design option, rather than a Design Principle, and will be considered at the next step of the process.
Comments: I think this should be a design principle as well. Obviously, it covers other principles but also pulls them together with some focus for the next stage, when designing the routes.	
There should be no overflying of Ramsgate	Given the location of Manston Airport in relation to the town of Ramsgate, it would not be possible to design procedures to the east of the airport that completely avoids any overflight of the town. However, designs will seek to minimise the impact of noise and emissions over the town in line with the Design Principles above. Manston Airport is also planning to introduce operational procedures (a noise preferential runway system) to minimise the impact on Ramsgate.
Comments:	
Any new airspace should be the minimum volume necessary	At this stage, Manston Airport is not planning on introducing any new airspace other than an Aerodrome Traffic Zone (ATZ). Notwithstanding this, the provision of regulated airspace to protect traffic operating at Manston Airport is a potential design option, rather than a Design Principle. Any requirement to introduce additional Controlled Airspace (CAS) would be considered under the Design Principle SAFETY.
Comments: Agree	

Potential Design Principle	Reasons for not Including
Consider the Flexible Use of Airspace	Any revised airspace structure should be adaptable to minimise the impact on other airspace users. Manston Airport assesses that this could be considered as a potential design option relating to the type of CAS required to protect traffic operating at Manston Airport. As previously stated, this will be considered under the Design Principle SAFETY.
Comments:	
Any new airspace should facilitate fair access to all airspace users.	Any regulatory change or airspace amendment should continue to allow fair access to the airspace for all aviation users. Manston Airport is not currently planning on introducing any regulated airspace to protect traffic operating from the airport, but should this be required, consideration of fair access will be considered under the Design Principle that seeks to minimise the impact on other airspace users.
Comments: Agree	

2. Review of Design Principles

2.1 Your responses

Please complete Table 1 and Table 2 below in line with the guidance provided in Section 1.

Representative Organisation:
example: Kent County Council, Maypole Airfield, NATS etc
Sutton-by-Dover Parish Council

Table 1 – Design Principles Review and Prioritisation

Design Principle	Rationale	Do you agree this is a Design Principle? (Yes or No)	How would you rank this Design Principle as a priority? (1 = Highest to 6 = Lowest or 0)
Procedures should be designed to minimise the impact of noise below 7,000 ft.	One of the Government's key environmental objectives is to limit and, where possible, reduce the number of people in the UK significantly affected by adverse impacts from aircraft noise. Current government policy states that below 7,000 ft., the noise impact of aviation on those on the ground takes greater precedence than the management of aircraft emissions.	yes	1
Comments: Routing at low level will dictate the level of noise pollution. The priority is to design the inbound and outbound routes to minimise noise pollution for local residents.			
Procedures should be designed that minimise aircraft emissions to reduce air pollution.	Improving environmental performance by reducing emissions is an outcome that the CAA's AMS is expected to deliver. More direct routes and the use of continuous climbs and descents are some of the measures that can be employed to reduce fuel burn, therefore reducing emissions per flight.	No	6
Comments: This design principle contradicts the first design principle.			

Design Principle	Rationale	Do you agree this is a Design Principle? (Yes or No)	How would you rank this Design Principle as a priority? (1 = Highest to 6 = Lowest or 0)
Where practicable, designs should seek to minimise the impact of noise on particularly sensitive areas.	The new routes should be designed to protect, as much as practicable, areas that are sensitive to noise. These may include sites of care or education, tranquil or rural areas that are used by the public for recreational purposes and cultural or historical assets. Avoiding overflight of all of these locations in every case would be impractical but we will endeavour to achieve this where possible.	yes	1

Comments: South east Kent is highly populated and is being developed rapidly to increase the number and density of housing. Routing the aircraft mainly over the sea would help to solve the noise pollution problem.

Procedures should be designed, where possible, to minimise the number of track miles flown.	In order to minimise emissions and to optimise operational efficiencies, designs should where possible, minimise the number of track miles flown.	No	6

Comments: Noise pollution is more important than saving the aircraft owners money.

Design Principle	Rationale	Do you agree this is a Design Principle? (Yes or No)	How would you rank this Design Principle as a priority? (1 = Highest to 6 = Lowest or 0)
Designs should minimise the impact on other airspace users in the local area.	The airspace and procedure design should aim to address the needs of all air traffic operating in the local area. New routes must take into account General Aviation (Sports & Recreation) operations at local airfields and avoid any unnecessary impact. Access to airspace should be ensured, especially for military fixed wing and rotary aircraft to meet defence operational and training requirements.	YES	1
Comments:			
Designs should where possible, make provision for multiple routes that can be used to spread the noise burden more equitably.	Airspace design should make provision for multiple arrival and departure routes to spread the burden of over-flight more equitably between communities.		
Comments: Difficult to rate this as we have no idea how the burden would be spread.			

Table 2 – Additional Comments

If there are any other areas of concern that you feel have not been considered, please provide additional comments below.
Comments: It seems that priority ~~none~~ has been given to minimising the track miles in order to save the aircraft owners money. Our priority as a community organisation is to limit the noise pollution of residents.

Are there other Design Principles not included in the list that you feel should be considered as candidates for the final shortlist? If so, please provide your comments.
Comments: Our preference is to see the departure routes (where the noise is greatest) over the sea to the north of Marston.

RSP | Manston Airport

Manston Airport Airspace Design and Procedures

Design Principle Stakeholder Review

Table of Contents

1. Airspace Design and Procedures

1.1 Introduction

RiverOak Strategic Partners Limited (RSP) would like to thank all stakeholders who have engaged with the Airspace Design and Procedures process so far and for the feedback provided by various representative bodies. This has helped us to derive a comprehensive list of potential Design Principles that reflect the statements made during focus group events and from questionnaires received.

This document has been prepared to share the list of Design Principles developed during recent engagement activities. We now need your help to provide further comments on the list to help us understand which Design Principles are most important to your organisations.

1.2 Background

RSP is proposing to redevelop and reopen Manston Airport as a successful hub for international air freight which also offers passenger travel, executive travel and aircraft engineering services. The airport would be comprehensively rebuilt and upgraded, including the provision of extensive cargo aircraft stands. The proposed development is subject to a Development Consent Order (DCO) application submitted by RSP to the government Planning Inspectorate (PINS) in July 2019.

In addition to the DCO, RSP will need to submit an application to the CAA to establish the procedures required to enable safe and efficient operations to and from the airport in accordance with the Civil Aviation Publication (CAP) 1616 – *Airspace Design: Guidance on the regulatory process for changing airspace design including community engagement requirements*.

The guidance in CAP 1616 sets out the framework for the 7 stages of the process and the activities that must be undertaken, including engagement and consultation requirements. We have now completed the initial phase of our engagement (part of Stage 1, CAP 1616) to establish our Design Principles for the introduction of Instrument Flight Procedures (IFP) at Manston Airport.

The process to gain approval for procedures is separate to the DCO process. We are only concerned with the Design Principles that will inform the design of the procedures as part of the CAP 1616 process.

[1] CAA Civil Aviation Publication (CAP) 1711

1.3 Development Methodology

All airspace changes within the UK must follow the regulatory process described in CAP 1616. The process was developed to ensure a high degree of transparency and adequate levels of two-way engagement with all relevant stakeholders, including local communities. The early stage of the process involves the development of Design Principles and the activities shown below have helped us to determine the initial list of potential Design Principles detailed later in Section 2:

- Design Principles Questionnaire – Aviation Stakeholders
- Design Principles Questionnaire – Non-Aviation Stakeholders
- Focus Groups

In early October, questionnaires were distributed to specialist aviation and technical groups, local authorities, parishes and politicians representing their organisations and communities, to seek their feedback on a number of topics related to airspace design. In addition, three focus groups were held in November where aviation and non-aviation stakeholders were offered the opportunity to discuss the proposed introduction of procedures.

The questionnaire responses have been analysed and along with the comments and discussion recorded during the focus groups, have helped us to develop a list of potential Design Principles which will serve as a qualitative framework against which the different design options that we produce, will be evaluated. It is therefore important that your views have been accurately captured.

1.4 Highest Priority Design Principles

Any changes to airspace arrangements must maintain high standards of safety. This is the main priority of the CAA in accordance with its statutory duties set out in Section 70(1) of the Transport Act 2000. Therefore, the overriding Design Principle against which the design options will be developed will be as follows:

- **SAFETY**

  Procedures must be designed to meet acceptable levels of flight safety

  The CAA's Airspace Modernisation Strategy (AMS) and the Masterplan that NERL has been commissioned (jointly by the Department for Transport and the CAA) to produce will affect any airspace and procedures that Manston Airport will be proposing to introduce. It is important that the impact of the AMS and the Masterplan work on this airspace change is included. Any design work will also take into account the change in vertical reference caused by the transition altitude, particularly with interactions with other airports. Therefore, subject to the overriding Design Principle of Safety, the highest priority Design Principle for this airspace change will be as follows:

- **HARMONISATION**

  Design options must accord with the CAA's published Airspace Modernisation Strategy (CAP 1711) and any current or future plans associated with it.

1.5 Stakeholder Review Requirements

Section 2 - Review of Design Principles

Please take a look at the potential Design Principles listed in Table 1 below. For each of the Design Principles listed, we would like you to state whether or not you agree that the statement constitutes a Design Principle. If you do not agree, please provide detail in the comment box provided.

In addition, we would like you to rank the Design Principles according to your organisation's priorities. Please rank the Design Principles from 1 (Highest priority) to 6 (Lowest priority). If you feel any of the Design Principles are not applicable to your organisation, please mark it as '0'. Please add any amplifying comments you wish to include, also in the comments box.

Please note that this list, and your subsequent prioritisation, does not include the highest priority Design Principles (SAFETY and HARMONISATION) that have been described in paragraph 1.4 above.

Please complete Table 2 to provide any additional comments that you feel have not been considered, or suggest any additional Design Principles you feel ought to be considered by RSP for Manston Airport.

Section 3 – Potential Design Principles Not Taken Forward

Table 3 articulates some other potential Design Principles that have not been included in the list of Design Principles under consideration. Please make any comments relating to this list in the space provided in Table 3.

Design Principles are used to help us identify design options at the next stage in the CAP 1616 process. By prioritising Design Principles now, we will be able to develop design options that best meet the Principles identified as the highest priorities while also maximising other potential benefits.

1.6 How to Respond

Please save the file that includes your responses as a Microsoft word document and attach to an email to the following address: manstonairspace@communityrelations.co.uk

In addition to the word file, we will accept scanned, hand-written responses as long as they are legible, or email responses that clearly identify the Design Principle or question to which your response relates.

It is important that email responses clearly show your name, representative organisation and contact details; this will allow us to cross-refer your response to the emails we send out.

We will also accept legible postal responses to Free Post 1616 by the deadline date below:

Please respond by mid-day Friday 17th January 2020.

[1] A single coordinated UK airspace design and implementation masterplan for airspace changes up to 2040.

[2] NERL – NATS En-Route Ltd - the sole provider of civilian en-route air traffic control over the UK.

1.7 Next Steps

The CAP 1616 process relates to gaining approval for airspace and procedures only for Manston Airport.

Completion of Stage 1 – Design Principles

The responses you now provide will help us to refine the Design Principles before we submit them to the CAA for its review and approval. This is known as the CAA's DEFINE Gateway and marks the completion of Stage 1 of the CAP 1616 airspace change process for Manston Airport.

Stage 2 – Design Options

Once the Design Principles are approved by the CAA, we will then progress to Stage 2 of the CAP 1616 process, where we will commence detailed airspace and procedure design work to develop design options.
Further engagement activities will take place during this stage to seek your views on the design options before they are submitted to the CAA for their appraisal. This is known as the CAA's DEVELOP and ASSESS Gateway currently planned for mid-2020.

Engagement during Stage 1 and 2 is for representatives of specialist aviation and local authority bodies who represent their local organisations and communities.

Stage 3 – Consultation on Design Options

We will be consulting widely with residents, businesses, communities, the public and other stakeholders at Stage 3 (Consult) later in 2020 or early 2021 when detailed design options have been developed.

RSP will ensure any feedback given during Stages 1 and 2 will be collated and included in a consultation report alongside feedback at Stage 3. The consultation report will be part of RSP's airspace change and procedures proposal submitted to the CAA for approval.

Documentation relating to the CAP 1616 process is published on the CAA's portal.

2. Review of Design Principles

2.1 Your Responses

Representative Organisation:
Thanet District Council

Table 1 – Design Principles Review and Prioritisation

Design Principle	Rationale	Do you agree this is a Design Principle? (Yes or No)	How would you rank this Design Principle as a priority? (1 = Highest to 6 = Lowest or 0)
Procedures should be designed to minimise the impact of noise below 7,000 ft.	One of the Government's key environmental objectives is to limit and, where possible, reduce the number of people in the UK significantly affected by adverse impacts from aircraft noise. Current government policy states that below 7,000 ft., the noise impact of aviation on those on the ground takes greater precedence than the management of aircraft emissions.	Yes	2
Comments: **This should be expanded to include procedures being designed to avoid overflight of sensitive areas e.g. schools, care institutions, special educational needs facilities, designated wildlife and nature sites. Also "where practicable" should be removed as an unnecessary qualifier that undermines the principle proposed.**			
Procedures should be designed that minimise aircraft emissions to reduce air pollution.	Improving environmental performance by reducing emissions is an outcome that the CAA's AMS is expected to deliver. More direct routes and the use of continuous climbs and descents are some of the measures that can be employed to reduce fuel burn, therefore reducing emissions per flight.	Yes	3
Comments: **Thanet District Council has declared a climate emergency and is fully committed to reducing emissions as part of the development of wider environmental strategy and policies. The principle proposed should state that procedures should incorporate measures within the DEFRA Clean Air Strategy 2019 and Aviation 2050: the future of UK Aviation 2018 Green Paper to align with the Council's air quality priorities.**			

Design Principle	Rationale	Do you agree this is a Design Principle? (Yes or No)	How would you rank this Design Principle as a priority? (1 = Highest to 6 = Lowest or 0)
Where practicable, designs should seek to minimise the impact of noise on particularly sensitive areas.	The new routes should be designed to protect, as much as practicable, areas that are sensitive to noise. These may include sites of care or education, tranquil or rural areas that are used by the public for recreational purposes and cultural or historical assets. Avoiding overflight of all of these locations in every case would be impractical but we will endeavour to achieve this where possible.	Yes	1
Comments: **This should be expanded to include procedures being designed to avoid overflight of sensitive areas e.g. schools, care institutions, special educational needs facilities, designated wildlife and nature sites. Also "where practicable" should be removed as an unnecessary qualifier that undermines the principle proposed.**			
Procedures should be designed, where possible, to minimise the number of track miles flown.	In order to minimise emissions and to optimise operational efficiencies, designs should where possible, minimise the number of track miles flown.	Yes	5
Comments: **No comments**			

Design Principle	Rationale	Do you agree this is a Design Principle? (Yes or No)	How would you rank this Design Principle as a priority? (1 = Highest to 6 = Lowest or 0)
Designs should minimise the impact on other airspace users in the local area.	The airspace and procedure design should aim to address the needs of all air traffic operating in the local area. New routes must take into account General Aviation (Sports & Recreation) operations at local airfields and avoid any unnecessary impact. Access to airspace should be ensured, especially for military fixed wing and rotary aircraft to meet defence operational and training requirements.	Yes	6
Comments: **No comments**			
Designs should where possible, make provision for multiple routes that can be used to spread the noise burden more equitably.	Airspace design should make provision for multiple arrival and departure routes to spread the burden of over-flight more equitably between communities.	Yes	4
Comments: **No comments**			

Table 2 – Additional Comments

If there are any other areas of concern that you feel have not been considered, please provide additional comments below.
Comments: **Notwithstanding the comments above, no further comments.**
Are there other Design Principles not included in the list that you feel should be considered as candidates for the final shortlist? If so, please provide your comments.
Comments: **The following principle should be considered with the shortlist:** **"The design should seek to align with the indicative flight swathes submitted through the application for Development Consent Order, and any deviation should be minimised."** **This is to ensure that the evidence submitted as part of the Nationally Significant Infrastructure process to support the project, subsequently assessed by Thanet District Council and other stakeholders, is not changed to the extent that the impacts of the development are significantly altered to change the required mitigation stated in any Development Consent Order.**

3 Potential Design Principles Not Taken Forward

3.1 Potential Design Principles

Below articulates some potential Design Principles that have also been developed as a result of the feedback received from questionnaires and the focus group meetings. However, these have not been included in the list of Design Principles shown above for your review for the reasons indicated. If you wish to make any comments relating to this list, please do so in the space provided. Please use as much space as you require, the size of the response box will expand as you type your response.

Table 2 – Potential Design Principles Not Taken Forward

Potential Design Principle	Reasons for not Including
Routes should, where possible, be designed to be PANS-OPS compliant	The new routes will be designed, where possible, so that they comply with the internationally agreed criteria set down in the International Civil Aviation Organisation (ICAO) document PANS-OPS 8168 Volume 2 – *Construction of Visual and Instrument Flight Procedures*. Any deviation from the criteria set down in PANS-OPS would require Manston Airport to produce a robust safety case to justify why the designs are not compliant, before they can be approved by the CAA. Manston Airport considers that this is a safety-related principle and as such, will be considered under the Design Principle SAFETY.
Comments: **No comments.**	
Routes should be chosen to minimise the flight distance over land and maximise distance over the sea to reduce the impact of noise and emissions	Consideration of the impact of noise and emissions has already been included as Design Principles. Manston Airport is required to produce a comprehensive list of route designs at Stage 2 of the CAP 1616 process and this list will include options that minimise the time spent overland by designing tracks that route over the sea as much as possible. As a result, this is considered to be a design option, rather than a Design Principle, and will be considered at the next step of the process.

Potential Design Principle	Reasons for not Including
Comments: **No comments.**	
There should be no overflying of Ramsgate	Given the location of Manston Airport in relation to the town of Ramsgate, it would not be possible to design procedures to the east of the airport that completely avoids any overflight of the town. However, designs will seek to minimise the impact of noise and emissions over the town in line with the Design Principles above. Manston Airport is also planning to introduce operational procedures (a noise preferential runway system) to minimise the impact on Ramsgate.
Comments: **No comments.**	
Any new airspace should be the minimum volume necessary	At this stage, Manston Airport is not planning on introducing any new airspace other than an Aerodrome Traffic Zone (ATZ). Notwithstanding this, the provision of regulated airspace to protect traffic operating at Manston Airport is a potential design option, rather than a Design Principle. Any requirement to introduce additional Controlled Airspace (CAS) would be considered under the Design Principle SAFETY.
Comments: **No comments.**	
Consider the Flexible Use of Airspace	Any revised airspace structure should be adaptable to minimise the impact on other airspace users. Manston Airport assesses that this could be considered as a potential design option relating to the type of CAS required to protect traffic operating at Manston Airport. As previously stated, this will be considered under the Design Principle SAFETY.
Comments: **No comments.**	

Potential Design Principle	Reasons for not Including
Any new airspace should facilitate fair access to all airspace users.	Any regulatory change or airspace amendment should continue to allow fair access to the airspace for all aviation users. Manston Airport is not currently planning on introducing any regulated airspace to protect traffic operating from the airport, but should this be required, consideration of fair access will be considered under the Design Principle that seeks to minimise the impact on other airspace users.
Comments: **No comments.**	

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Manston Airport Airspace Design and Procedures

Design Principle Stakeholder Review

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1. Airspace Design and Procedures

1.1 Introduction

RiverOak Strategic Partners Limited (RSP) would like to thank all stakeholders who have engaged with the Airspace Design and Procedures process so far and for the feedback provided by various representative bodies. This has helped us to derive a comprehensive list of potential Design Principles that reflect the statements made during focus group events and from questionnaires received.

This document has been prepared to share the list of Design Principles developed during recent engagement activities. We now need your help to provide further comments on the list to help us understand which Design Principles are most important to your organisations.

1.2 Background

RSP is proposing to redevelop and reopen Manston Airport as a successful hub for international air freight which also offers passenger travel, executive travel and aircraft engineering services. The airport would be comprehensively rebuilt and upgraded, including the provision of extensive cargo aircraft stands. The proposed development is subject to a Development Consent Order (DCO) application submitted by RSP to the government Planning Inspectorate (PINS) in July 2019.

In addition to the DCO, RSP will need to submit an application to the CAA to establish the procedures required to enable safe and efficient operations to and from the airport in accordance with the Civil Aviation Publication (CAP) 1616 – *Airspace Design: Guidance on the regulatory process for changing airspace design including community engagement requirements*.

The guidance in CAP 1616 sets out the framework for the 7 stages of the process and the activities that must be undertaken, including engagement and consultation requirements. We have now completed the initial phase of our engagement (part of Stage 1, CAP 1616) to establish our Design Principles for the introduction of Instrument Flight Procedures (IFP) at Manston Airport.

The process to gain approval for procedures is separate to the DCO process. We are only concerned with the Design Principles that will inform the design of the procedures as part of the CAP 1616 process.

[1] CAA Civil Aviation Publication (CAP) 1711

1.3 Development Methodology

All airspace changes within the UK must follow the regulatory process described in CAP 1616. The process was developed to ensure a high degree of transparency and adequate levels of two-way engagement with all relevant stakeholders, including local communities. The early stage of the process involves the development of Design Principles and the activities shown below have helped us to determine the initial list of potential Design Principles detailed later in Section 2:

- Design Principles Questionnaire – Aviation Stakeholders
- Design Principles Questionnaire – Non-Aviation Stakeholders
- Focus Groups

In early October, questionnaires were distributed to specialist aviation and technical groups, local authorities, parishes and politicians representing their organisations and communities, to seek their feedback on a number of topics related to airspace design. In addition, three focus groups were held in November where aviation and non-aviation stakeholders were offered the opportunity to discuss the proposed introduction of procedures.

The questionnaire responses have been analysed and along with the comments and discussion recorded during the focus groups, have helped us to develop a list of potential Design Principles which will serve as a qualitative framework against which the different design options that we produce, will be evaluated. It is therefore important that your views have been accurately captured.

1.4 Highest Priority Design Principles

Any changes to airspace arrangements must maintain high standards of safety. This is the main priority of the CAA in accordance with its statutory duties set out in Section 70(1) of the Transport Act 2000. Therefore, the overriding Design Principle against which the design options will be developed will be as follows:

- **SAFETY**

  Procedures must be designed to meet acceptable levels of flight safety

  The CAA's Airspace Modernisation Strategy (AMS) and the Masterplan that NERL has been commissioned (jointly by the Department for Transport and the CAA) to produce will affect any airspace and procedures that Manston Airport will be proposing to introduce. It is important that the impact of the AMS and the Masterplan work on this airspace change is included. Any design work will also take into account the change in vertical reference caused by the transition altitude, particularly with interactions with other airports. Therefore, subject to the overriding Design Principle of Safety, the highest priority Design Principle for this airspace change will be as follows:

- **HARMONISATION**

  Design options must accord with the CAA's published Airspace Modernisation Strategy (CAP 1711) and any current or future plans associated with it.

1.5 Stakeholder Review Requirements

Section 2 - Review of Design Principles

Please take a look at the potential Design Principles listed in Table 1 below. For each of the Design Principles listed, we would like you to state whether or not you agree that the statement constitutes a Design Principle. If you do not agree, please provide detail in the comment box provided.

In addition, we would like you to rank the Design Principles according to your organisation's priorities. Please rank the Design Principles from 1 (Highest priority) to 6 (Lowest priority). If you feel any of the Design Principles are not applicable to your organisation, please mark it as '0'. Please add any amplifying comments you wish to include, also in the comments box.

Please note that this list, and your subsequent prioritisation, does not include the highest priority Design Principles (SAFETY and HARMONISATION) that have been described in paragraph 1.4 above.

Please complete Table 2 to provide any additional comments that you feel have not been considered, or suggest any additional Design Principles you feel ought to be considered by RSP for Manston Airport.

Section 3 – Potential Design Principles Not Taken Forward

Table 3 articulates some other potential Design Principles that have not been included in the list of Design Principles under consideration. Please make any comments relating to this list in the space provided in Table 3.

Design Principles are used to help us identify design options at the next stage in the CAP 1616 process. By prioritising Design Principles now, we will be able to develop design options that best meet the Principles identified as the highest priorities while also maximising other potential benefits.

1.6 How to Respond

Please save the file that includes your responses as a Microsoft word document and attach to an email to the following address: manstonairspace@communityrelations.co.uk

In addition to the word file, we will accept scanned, hand-written responses as long as they are legible, or email responses that clearly identify the Design Principle or question to which your response relates.

It is important that email responses clearly show your name, representative organisation and contact details; this will allow us to cross-refer your response to the emails we send out.

We will also accept legible postal responses to Free Post 1616 by the deadline date below:

Please respond by mid-day Friday 17th January 2020.

[1] A single coordinated UK airspace design and implementation masterplan for airspace changes up to 2040.

[2] NERL – NATS En-Route Ltd - the sole provider of civilian en-route air traffic control over the UK.

1.7 Next Steps

The CAP 1616 process relates to gaining approval for airspace and procedures only for Manston Airport.

Completion of Stage 1 – Design Principles

The responses you now provide will help us to refine the Design Principles before we submit them to the CAA for its review and approval. This is known as the CAA's DEFINE Gateway and marks the completion of Stage 1 of the CAP 1616 airspace change process for Manston Airport.

Stage 2 – Design Options

Once the Design Principles are approved by the CAA, we will then progress to Stage 2 of the CAP 1616 process, where we will commence detailed airspace and procedure design work to develop design options.
Further engagement activities will take place during this stage to seek your views on the design options before they are submitted to the CAA for their appraisal. This is known as the CAA's DEVELOP and ASSESS Gateway currently planned for mid-2020.

Engagement during Stage 1 and 2 is for representatives of specialist aviation and local authority bodies who represent their local organisations and communities.

Stage 3 – Consultation on Design Options

We will be consulting widely with residents, businesses, communities, the public and other stakeholders at Stage 3 (Consult) later in 2020 or early 2021 when detailed design options have been developed.

RSP will ensure any feedback given during Stages 1 and 2 will be collated and included in a consultation report alongside feedback at Stage 3. The consultation report will be part of RSP's airspace change and procedures proposal submitted to the CAA for approval.

Documentation relating to the CAP 1616 process is published on the CAA's portal.

2. Review of Design Principles

2.1 Your Responses

Please complete

Table and **Error! Reference source not found.** below in line with the guidance provided in Section **Error! Reference source not found.**. Please use as much space as you require, the size of the response box will expand as you type your response.

Please complete the following:

Representative Organisation:
Westgate-on-Sea Town Council

Table 1 – Design Principles Review and Prioritisation

Design Principle	Rationale	Do you agree this is a Design Principle? (Yes or No)	How would you rank this Design Principle as a priority? (1 = Highest to 6 = Lowest or 0)
Procedures should be designed to minimise the impact of noise below 7,000 ft.	One of the Government's key environmental objectives is to limit and, where possible, reduce the number of people in the UK significantly affected by adverse impacts from aircraft noise. Current government policy states that below 7,000 ft., the noise impact of aviation on those on the ground takes greater precedence than the management of aircraft emissions.	Yes	2
Comments:			

Design Principle	Rationale	Do you agree this is a Design Principle? (Yes or No)	How would you rank this Design Principle as a priority? (1 = Highest to 6 = Lowest or 0)
Procedures should be designed that minimise aircraft emissions to reduce air pollution.	Improving environmental performance by reducing emissions is an outcome that the CAA's AMS is expected to deliver. More direct routes and the use of continuous climbs and descents are some of the measures that can be employed to reduce fuel burn, therefore reducing emissions per flight.	Yes	1
Comments:			
Where practicable, designs should seek to minimise the impact of noise on particularly sensitive areas.	The new routes should be designed to protect, as much as practicable, areas that are sensitive to noise. These may include sites of care or education, tranquil or rural areas that are used by the public for recreational purposes and cultural or historical assets. Avoiding overflight of all of these locations in every case would be impractical but we will endeavour to achieve this where possible.	Yes	4
Comments:			
Procedures should be designed, where possible, to minimise the number of track miles flown.	In order to minimise emissions and to optimise operational efficiencies, designs should where possible, minimise the number of track miles flown.	Yes	3

Design Principle	Rationale	Do you agree this is a Design Principle? (Yes or No)	How would you rank this Design Principle as a priority? (1 = Highest to 6 = Lowest or 0)
Comments:			
Designs should minimise the impact on other airspace users in the local area.	The airspace and procedure design should aim to address the needs of all air traffic operating in the local area. New routes must take into account General Aviation (Sports & Recreation) operations at local airfields and avoid any unnecessary impact. Access to airspace should be ensured, especially for military fixed wing and rotary aircraft to meet defence operational and training requirements.	Yes	6
Comments:			
Designs should where possible, make provision for multiple routes that can be used to spread the noise burden more equitably.	Airspace design should make provision for multiple arrival and departure routes to spread the burden of over-flight more equitably between communities.	Yes	5
Comments:			

Table 2 – Additional Comments

If there are any other areas of concern that you feel have not been considered, please provide additional comments below.
Comments:
Are there other Design Principles not included in the list that you feel should be considered as candidates for the final shortlist? If so, please provide your comments.
Comments:N/A

3 Potential Design Principles Not Taken Forward

3.1 Potential Design Principles

Error! Reference source not found. below articulates some potential Design Principles that have also been developed as a result of the feedback received from questionnaires and the focus group meetings. However, these have not been included in the list of Design Principles shown in

Table above for your review for the reasons indicated. If you wish to make any comments relating to this list, please do so in the space provided. Please use as much space as you require, the size of the response box will expand as you type your response.

Table 2 – Potential Design Principles Not Taken Forward

Potential Design Principle	Reasons for not Including
Routes should, where possible, be designed to be PANS-OPS compliant	The new routes will be designed, where possible, so that they comply with the internationally agreed criteria set down in the International Civil Aviation Organisation (ICAO) document PANS-OPS 8168 Volume 2 – *Construction of Visual and Instrument Flight Procedures*. Any deviation from the criteria set down in PANS-OPS would require Manston Airport to produce a robust safety case to justify why the designs are not compliant, before they can be approved by the CAA. Manston Airport considers that this is a safety-related principle and as such, will be considered under the Design Principle SAFETY.
Comments:	

Potential Design Principle	Reasons for not Including
Routes should be chosen to minimise the flight distance over land and maximise distance over the sea to reduce the impact of noise and emissions	Consideration of the impact of noise and emissions has already been included as Design Principles. Manston Airport is required to produce a comprehensive list of route designs at Stage 2 of the CAP 1616 process and this list will include options that minimise the time spent overland by designing tracks that route over the sea as much as possible. As a result, this is considered to be a design option, rather than a Design Principle, and will be considered at the next step of the process.
Comments:	
There should be no overflying of Ramsgate	Given the location of Manston Airport in relation to the town of Ramsgate, it would not be possible to design procedures to the east of the airport that completely avoids any overflight of the town. However, designs will seek to minimise the impact of noise and emissions over the town in line with the Design Principles above. Manston Airport is also planning to introduce operational procedures (a noise preferential runway system) to minimise the impact on Ramsgate.
Comments:	
Any new airspace should be the minimum volume necessary	At this stage, Manston Airport is not planning on introducing any new airspace other than an Aerodrome Traffic Zone (ATZ). Notwithstanding this, the provision of regulated airspace to protect traffic operating at Manston Airport is a potential design option, rather than a Design Principle. Any requirement to introduce additional Controlled Airspace (CAS) would be considered under the Design Principle SAFETY.
Comments:	

Potential Design Principle	Reasons for not Including
Consider the Flexible Use of Airspace	Any revised airspace structure should be adaptable to minimise the impact on other airspace users. Manston Airport assesses that this could be considered as a potential design option relating to the type of CAS required to protect traffic operating at Manston Airport. As previously stated, this will be considered under the Design Principle SAFETY.
Comments:	
Any new airspace should facilitate fair access to all airspace users.	Any regulatory change or airspace amendment should continue to allow fair access to the airspace for all aviation users. Manston Airport is not currently planning on introducing any regulated airspace to protect traffic operating from the airport, but should this be required, consideration of fair access will be considered under the Design Principle that seeks to minimise the impact on other airspace users.
Comments:	

RSP | Manston Airport

Manston Airport Airspace Design and Procedures

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Please complete the following:

Representative Organisation:
Westgate-on-Sea Town Council (Part 2)

Table 1 – Design Principles Review and Prioritisation

Design Principle	Rationale	Do you agree this is a Design Principle? (Yes or No)	How would you rank this Design Principle as a priority? (1 = Highest to 6 = Lowest or 0)
Procedures should be designed to minimise the impact of noise below 7,000 ft.	One of the Government's key environmental objectives is to limit and, where possible, reduce the number of people in the UK significantly affected by adverse impacts from aircraft noise. Current government policy states that below 7,000 ft., the noise impact of aviation on those on the ground takes greater precedence than the management of aircraft emissions.	Yes	2
Comments:			

Design Principle	Rationale	Do you agree this is a Design Principle? (Yes or No)	How would you rank this Design Principle as a priority? (1 = Highest to 6 = Lowest or 0)
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Comments:			
Where practicable, designs should seek to minimise the impact of noise on particularly sensitive areas.	The new routes should be designed to protect, as much as practicable, areas that are sensitive to noise. These may include sites of care or education, tranquil or rural areas that are used by the public for recreational purposes and cultural or historical assets. Avoiding overflight of all of these locations in every case would be impractical but we will endeavour to achieve this where possible.	Yes	4
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Design Principle	Rationale	Do you agree this is a Design Principle? (Yes or No)	How would you rank this Design Principle as a priority? (1 = Highest to 6 = Lowest or 0)
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Comments:			
Designs should where possible, make provision for multiple routes that can be used to spread the noise burden more equitably.	Airspace design should make provision for multiple arrival and departure routes to spread the burden of over-flight more equitably between communities.	Yes	5
Comments:			

Table 2 – Additional Comments

If there are any other areas of concern that you feel have not been considered, please provide additional comments below.
Comments: We wanted to feedback that this is a comprehensive document overall and considers all aspects, it is hoped the aspirations can be achieved. Your contribution to the trees and woodland initiative in Thanet shows that you are an environmentally minded organisation. We do have a couple of concerns about the practicalities of the operations such as site access, impact on the roads network and potential to affect the flow of tourism traffic in Thanet. **We wanted to highlight the need to encourage research into solar powered aircraft and renewable energies building an ethos on sustainable alternatives for the future. You could be a flagship aviation company pushing forward solar powered flights for the future.**
Are there other Design Principles not included in the list that you feel should be considered as candidates for the final shortlist? If so, please provide your comments.
Comments:N/A

3 Potential Design Principles Not Taken Forward

3.1 Potential Design Principles

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Comments:	

Potential Design Principle	Reasons for not Including
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Comments:	
Any new airspace should facilitate fair access to all airspace users.	Any regulatory change or airspace amendment should continue to allow fair access to the airspace for all aviation users. Manston Airport is not currently planning on introducing any regulated airspace to protect traffic operating from the airport, but should this be required, consideration of fair access will be considered under the Design Principle that seeks to minimise the impact on other airspace users.
Comments:	