

Cumbernauld Airport Airspace Change

Reintroduction of an Instrument Approach Procedure to Runway 25



CAP1616 Stage 1 Define

Step 1B Design Principles

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Issue	Amendment	Date
Issue 1	First formal issue	15 th March 2020
Issue 2	Revised following initial CAA feedback to show stakeholder influence and decision-making rationale.	20 th March 2020
Issue 3	Revised following CAA Gateway to show rationale for discounting inputs to DPs.	28 th March 2020

Approval Level	Authority	Name
Author	Merlin Aerospace Consulting Ltd	
Reviewer		

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Background

1. Cumbernauld Airport is a small General Aviation aerodrome located on the outskirts of the town of Cumbernauld approximately halfway between the cities of Glasgow and Edinburgh. It opened in 1966; a paved 820m runway was laid in 1988. It sits within a standard surface-to-2338' Air Traffic Zone (ATZ) surrounded by Class G airspace. Immediately above is the Glasgow CTA with a base of 3000'. To the east, the CTA base rises to 3500' and 4 miles to the west lies the Glasgow CTR rising from the surface to 6000'. This, combined with the Edinburgh CTR 10 miles to the east, has traditionally funnelled VFR traffic routing north to south in the vicinity,

Introduction

2. From the early 1990s, the airport enjoyed the use of an NDB/DME non-precision instrument approach procedure to runway 25 until a storm destroyed the ground-based navigation equipment in 2013. Since then, Britten Norman Islander aircraft which fly to remote Scottish Islands and are maintained at Cumbernauld have been hampered in meeting the standards of continuity, regularity and capacity due to inclement weather disrupting maintenance-flight arrivals.

3. There is an opportunity to reintroduce a Performance Based Navigation (PBN) instrument approach to runway 25 utilising RNAV(GNSS) IAPs. Through European funding, the subject aircraft were equipped with suitable receiver equipment and it is now essential that Cumbernauld Airport satisfies the need to provide their client operators and others with an approach to be used when currently delay or diversion results from poor weather. No new controlled airspace is required to enable this.

4. The scale of the change is very small and throughout this process evidence will be presented showing that of the six thousand annual aircraft movements currently recorded, around 1% may actually use the approach. As a movement is counted as a take-off or a landing (and generally are evenly balanced) a figure of 3000 approaches has been used. In other words, around 0.75 aircraft per week on average will utilise the system. Subject to permission other operators might be given access to the approaches.

Objectives

5. Cumbernauld Airport's objective in commencing an Airspace Change Proposal is detailed in the Statement of Need which can be found on the CAA website; - <https://airspacechange.caa.co.uk/PublicProposalArea?plD=210>

6. A key building block of this proposal is the development of Design Principles which can be agreed with Stakeholders. This document sets out how, as part of Stage 1 Define, the CS has followed CAP 1616 Step 1B Design Principles Appendix D and produced them as detailed below together with an explanation of how the final results were influenced through the engagement process. The document and attachments demonstrate that the Change Sponsor (CS) has followed CAP1616 Stage 1 Define, Step 1B Design Principles to create a list of Design Principles (DPs) with an explanation of how these were influenced through the engagement process. The final Design Principles are in para 26. See Appendix C also.

Step 1A Assessment

7. After the Statement of Need had been filed, an Assessment meeting was held at the offices of the CAA on 15th January 2020. Having been advised that the CAA were satisfied with the outcome of the meeting the minutes and a Timeline were published on the portal. This permitted a start be made on Step 1B with an agreed Gateway target of Friday 27th March 2020. In order to meet this Gateway, CAA has to have sight of material 2 weeks prior meaning all responses had to be received from Stakeholders by Thursday 12th March 2020.

Stakeholders

8. Using CAP1616 Appendix D Airspace Design Principles, the CS considered who would be best placed to help form such a list. Due to an historic lack of engagement with the Change Sponsor by both North Lanarkshire and Falkirk local authorities, Scottish Government's Transport Scotland and Members of the Scottish Parliament these bodies were not included. Along with all lowland authorities they are being consulted by Glasgow and Edinburgh Airports and the National Air Traffic Airspace Team about major changes to Commercial Air Transports flights above them in numbers which far outweigh this proposal.

9. A group consisting of Air Stakeholders formed largely from a longstanding CAA body called NATMAC – the National Air Traffic Management Advisory Committee and based aircraft and helicopter operators together with Glasgow and Edinburgh Airports and National Air Traffic Services were identified as the target audience. See Appendix B for the full list.

10. In assembling the list of Stakeholders, it quickly became clear that Edinburgh and Glasgow Airports, along with their Air Traffic Service Providers, had already started major airspace change proposals promoted under the Future Airspace Strategy Implementation (North) project [FASI(N)] which meant they were very keen to engage and cognisant of the process Cumbernauld had just embarked upon. This helped greatly and resulted in good feedback.

11. On Wednesday 4th March the CS and Project Manager attended an Airspace Change workshop at Glasgow Airport hosted by the Airport's Airspace Change Consultants. In conversations before and after the meeting which was well attended and included Air Stakeholders for Cumbernauld, it was clear the willingness of many to engage and support for the proposal.

Timeline

12. As this change is of a very minor scale, has been in gestation since 2014, is now subject to support from the UK Department for Transport and facilitation from the CAA, a short window of engagement was chosen in order to meet the Stage 1 Define gateway scheduled for the 27th March 2020. Consequently, an email communication was sent to the stakeholders on Wednesday 18th February asking for a response by Thursday 12th March. No requests to extend the deadline was received.

13. Due to a sparse response after 2 weeks, a reminder e-mail was sent out on Sunday 8th March 2020 to the thirty-five that hadn't replied up to date. By Friday 13th March 2020 sufficient numbers had replied to enable this report to be written and submitted to CAA.

Draft Design Principles

14. Using a combination of professional judgement and knowledge gained from similar aerodromes that had already passed through this stage, nine draft Design Principles were drawn up and attached to the letter. These were: -

1. The design must be ICAO Doc 8168 PANS OPS compliant, validated and flyable by aircraft types in speed category A and B.
2. The Design must reduce the scattering effect of aircraft arrival tracks resulting from pilot visual navigation and regularise approach paths onto a predetermined, published route to the existing final approach bringing certainty to local residents and other airspace users.
3. The new procedures should not increase the number of people overflowed by aircraft participating in the approach.
4. The design should achieve a reduction in visual intrusion.
5. The design should respect existing noise abatement/sensitive areas.
6. The design must accommodate PBN traffic in line with CAA's CAP1711 Airspace Modernisation Strategy.
7. The design should benefit from collaboration with other Scottish airports and NATS to ensure it is compatible with the wider programme of lower altitude and network airspace changes being coordinated by the FASI North programme.¹

Engagement and feedback

15. The letter from the CS setting out the purpose of the engagement with an invitation to participate was issued on the 18th February with an end date of Thursday 12th March. This would allow one day to submit the findings to the CAA. See Appendix A

¹ Note; DP 7 was taken directly from both Glasgow and Edinburgh Airport's ACPs.

16. As the aim of this ACP is to re-establish a previous instrument approach procedure the draft design principle offered focussed on issues which, in the opinion of the CS, were possibly of interest to the Stakeholders. See Appendix C Table 1.

17. Some forty-one organisations were written to with nine replying within a few days. As the majority needed prompting for a response a reminder was issued with one week to go to the Thursday 12th March deadline. A determined effort to contact recipients of the original email garnered a further twenty responses by the original deadline leaving sixteen unaccounted for. See Fig 1

18. It was notable that two national representative bodies, the Light Aircraft Association (LAA) and British Microlight Aircraft Association (BMAA) replied immediately with their own pre-prepared national Design Principles which could be checked against individual drafts. No conflicts were found. In a further email from an LAA local representative who had also attended the Glasgow Airport event, further suggestions were made. The British Gliding Association (BGA) also replied promptly adding a new stand-alone DP for inclusion with no objections to the list of draft DPs.

19. A reminder was sent out 8th March because so few Stakeholders had replied. Just as the deadline approached a number of responses arrived. None objected to either the proposal or any particular DP. Two key replies arrived from NATS Airspace Team and Glasgow Airport. Each supported the project, didn't object to any particular DP and went on to offer suggested wording to add to the DPs. Both suggested reordering priority unsurprisingly to elevate their proposed DPs to the higher order.

20. Due to the delayed response from Stakeholders a 48-hour extension was granted by the CAA to allow for further analysis of the responses and evolution of the final list. See Appendix C Table 2.

21. The outturn was that of the twenty-nine responders in total there were 8 "no comment", 12 made specific comments about the draft DPs or offered new ones to add to the list. Three replied that, although members of NATMAC, they didn't comment on individual ACPs and three gave holding replies but never followed up.

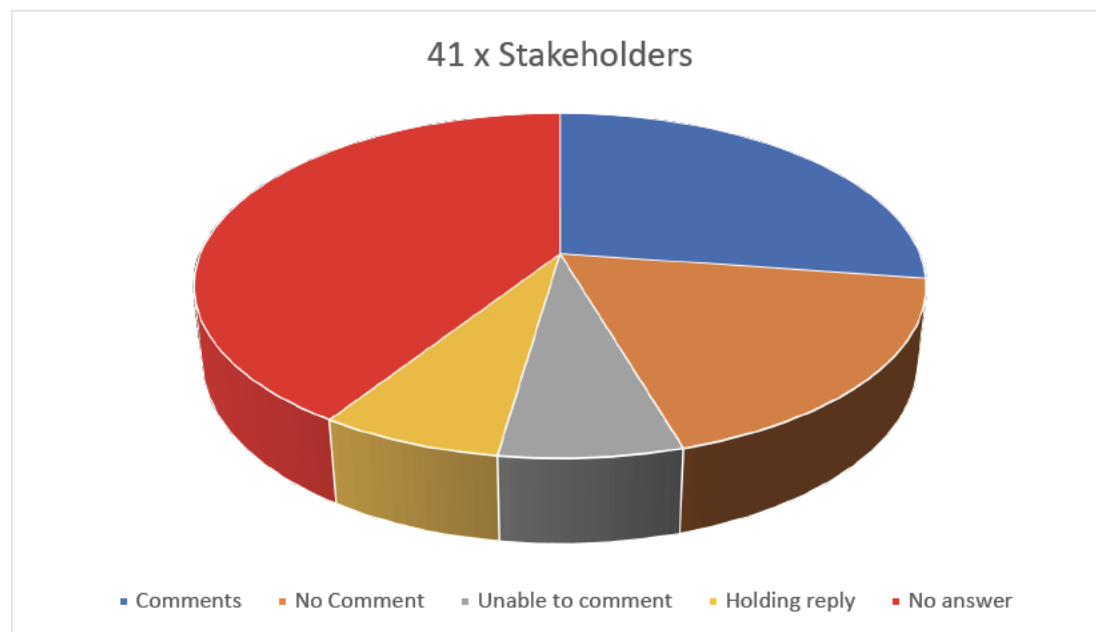


Fig 1 Chart showing proportion of responses.

22. By the end of the deadline 16 organisations had made no reply despite being reminded. See Appendix E for a record of the responses.

Evolution of the Design Principles

22. CAP 1616 Appendix D asks for *inter alia* -

“an explanation of the issues raised during the engagement process and of how stakeholder feedback influenced the final set of principles.”

23. There were no issues raised by any Stakeholders during the process and all correspondence arrived by email. Just over half of the emails required nothing more than filing; the balance offered new wording for DPs and/or suggested priorities. The CS and PM had no objections to any of the proposals and so the task became one of refinement. This was achieved by amalgamating two of the DPs or by adding a few extra words to existing DPs to reflect views of Stakeholders.

24. Table 2 comprises twelve DPs some of which matched in part other suggested wording. Using input from all responses and professional judgement it shows how the PM created amalgamated DPs to reflect several similar suggestions. Furthermore, it was decided to remove draft DPs 3 & 4 as they would be unlikely to be met whatever the final defined routes may be. See Appendix D for tabulated responses to stakeholder suggested Design Principles with reasons for accepting, noting or discounting.

Conclusion

25. As a result of the excellent quality of many of the suggestions received a new set of Design Principles have been written. Where a new DP came with a suggested rank this was applied without bias. For example, DP1 was suggested by NATS Airspace Team and the CS completely agrees it should be given the highest priority. On the other hand, DP9 is given as the CAA IFP Regulator will not approve a design that isn't within this principle hence it can be relegated to the bottom. Note: Speed Category B was dropped due to runway length.

26. The final DPs are as follows -

1. The design must maintain and, where possible, enhance current levels of safety.
2. The design must not require the introduction of new controlled airspace in order to be implemented.
3. The design must reduce the scattering effect of aircraft arrival tracks resulting from pilot visual navigation and regularise approach paths onto a predetermined, published route to the existing final approach bringing certainty to local residents and other airspace users.
4. The design shall benefit from collaboration with other Scottish airports and NATS to ensure it is compatible with the wider programme of lower altitude and network airspace changes being coordinated by the FASI North programme with adjacent aerodromes.
5. The design should minimise the impact on General Aviation including sporting and recreational aviation activity and not deny continued rights of access to existing airspace nor place restrictions on non-participating traffic.

6. The design should respect Cumbernauld Airport's existing noise abatement/sensitive areas.
 7. The design shall not adversely affect designs being developed by Glasgow and Edinburgh Airports in the course of their ACPs.
 8. The design must accommodate Performance Based Navigation traffic in line with CAA's CAP1711 Airspace Modernisation Strategy.
 9. The design must be ICAO Doc 8168 PANS OPS compliant, validated and flyable by aircraft types in speed category A.
27. The Change Sponsor believes that Stage 1 Define has been completed to the best of abilities and is content with the outcome of the engagement. The final Design Principles are acceptable and will be used to inform the design of the Instrument Approach Procedure.
28. The CS is clear that stakeholders will remain as such throughout the ACP process and that they will have further opportunity to comment at subsequent stages including the consultation.

Ends

Appendix A NATMAC letter

To all NATMAC Members

18th February 2020

Classification: Public

Dear Sirs/Ma'ams,

Cumbernauld Airport PBN Instrument Approach Procedures: ACP-2019-42

On behalf of Mr [REDACTED], Cumbernauld Airport's Owner and Operator, I'm writing to all NATMAC Group Members to invite you to engage in this CAP1616 Step 1b Airspace Change Proposal process and consider our Design Principles for a new instrument approach procedure. No application to establish Controlled Airspace is planned nor required; the combination of Class G and the existing ATZ will suffice.

Please refer to the CAA Airspace Change Portal for further details :-
<https://airspacechange.caa.co.uk/PublicProposalArea?plD=210>

Our proposal is born out of the loss of the longstanding NDB/DME let down which had to be withdrawn due to gale damage affecting the transmitter equipment. Since then, the lack of an approach aid has hampered operations notably the maintenance and support of BN-2 Islander aircraft which serve the Scottish Islands. The Statement of Need explains the background in more detail. Our goal is to establish a PBN approach to runway 25 only and for it to consist of either one straight leg or a compact design using RF turns.

In order to help ensure the needs of the businesses at the Airport are met, balanced against other local aviation stakeholders' concerns, a set of draft Design Principles has been created. These will provide the framework with which we will produce design options for subsequent appraisal at Stage 2.

As I'm sure you're aware, this a very early phase of the whole process and I recognise engaging you on this narrow aspect of the ACP may well raise questions about what any final designs might be. In line with the process Cumbernauld is following, you will be afforded further opportunities to comment during development and then participate in the stakeholder consultation phase later this year.

We would like to hear your thoughts on four aspects of the attached list of draft Design Principles:

- 1) Whether you agree or disagree with any of the Principles
- 2) Any comment against each Principle
- 3) Your priority for each Principle, and
- 4) If you have any additional Principles with your rationale.

Following the Secretary of State for Transport's Direction to the CAA concerning those aerodromes which commenced their application many years ago under CAP1122, we are working with the CAA to seek an accelerated journey through the approvals process using scalability built into the latest version of CAP1616. Therefore, if you would be kind enough to reply by close of play Thursday 12th March 2020, I would be much obliged; to save reminders being sent out please send a no comment response if that's your position.

Should roles within your organisation have changed, please forward to the current NATMAC member.

Please feel free to contact me if you would like to discuss our ACP further.

[REDACTED]
Project Manager
Cumbernauld Airport ACP

[REDACTED]

Appendix B

List of Stakeholders

Airlines UK
Airspace4All
Airport Operators Association (AOA)
Airfield Operators Group (AOG)
Aircraft Owners and Pilots Association (AOPA)
Airspace Change Organising Group (ACOG)
Association of Remotely Piloted Aircraft Systems UK (ARPAS-UK)
Aviation Environment Federation (AEF)
British Airways (BA)
BAe Systems
British Airline Pilots Association (BALPA)
British Balloon and Airship Club
British Business and General Aviation Association (BBGA)
British Gliding Association (BGA)
British Helicopter Association (BHA)
British Hang Gliding and Paragliding Association (BHPA)
British Microlight Aircraft Association (BMAA) / General Aviation Safety Council (GASCo)
British Model Flying Association (BMFA)
British Skydiving
Drone Major
Edinburgh Airport
General Aviation Alliance (GAA)
Glasgow Airport
Guild of Air Traffic Control Officers (GATCO)
Heavy Airlines
Heliair - Cumbernauld
Helicopter Club of Great Britain (HCGB)
Honourable Company of Air Pilots (HCAP)
Iprosurv
Isle of Man CAA
Light Aircraft Association (LAA)
Low Fare Airlines
Military Aviation Authority (MAA)
Ministry of Defence - Defence Airspace and Air Traffic Management (MoD DAATM)
NATS
Navy Command HQ
PDG Helicopters
Phoenix Flight Training
PPL/IR (Europe)
PPL/IR (Europe)
UK Airprox Board (UKAB)
UK Flight Safety Committee (UKFSC)
United States Air Force Europe
(3rd Air Force-Directorate of Flying (USAFE (3rd AF-DOF))

Appendix C

Design Principles evolution

Cumbernauld Airport CAP1616 Step 1B	
Table 1 showing original draft principles as circulated on 18 th February 2020	
Rank	Design Principle
1	The design must be ICAO Doc 8168 PANS OPS compliant, validated and flyable by aircraft types in speed category A and B.
2	The design must reduce the scattering effect of aircraft arrival tracks resulting from pilot visual navigation and regularise approach paths onto a predetermined, published route to the existing final approach bringing certainty to local residents and other airspace users.
3	The new procedures should not increase the number of people overflown by aircraft participating in the approach.
4	The design should achieve a reduction in visual intrusion.
5	The design should respect existing noise abatement/sensitive areas.
6	The design must accommodate PBN traffic in line with CAA's CAP1711 Airspace Modernisation Strategy.
7	The design should benefit from collaboration with other Scottish airports and NATS to ensure it is compatible with the wider programme of lower altitude and network airspace changes being coordinated by the FASI North programme.

Cumbernauld Airport CAP1616 Step 1B		
Table 2 showing amended existing principles post stakeholder feedback		
Rank	Previous	Design Principle
7	1	The design must be ICAO Doc 8168 PANS OPS compliant, validated and flyable by aircraft types in speed category A.
3	2	The design must reduce the scattering effect of aircraft arrival tracks resulting from pilot visual navigation and regularise approach paths onto a predetermined, published route to the existing final approach bringing certainty to local residents and other airspace users.
/	3	deleted
/	4	deleted
6	5	The design should respect existing noise abatement/sensitive areas.
10	6	The design must accommodate PBN traffic in line with CAA's CAP1711 Airspace Modernisation Strategy.
4	7	The design shall benefit from collaboration with other Scottish airports and NATS to ensure it is compatible with the wider programme of lower altitude and network airspace changes being coordinated by the FASI North programme.
8	New	The design shall not adversely affect designs for the wider network or local designs being developed by Glasgow and Edinburgh Airports in the course of their ACPs.
9	New	The design must be compatible with the FASI(N) route network and be coordinated with adjacent aerodromes.
5	New	The design must minimise the impact on GA including sporting and recreational aviation activity and not deny continued rights of access to existing airspace.
2	New	The design must not require the introduction of new controlled airspace in order to be implemented.
1	New	The design must maintain and where possible enhance current levels of safety.

Cumbernauld Airport CAP1616 Step 1B - Final		
Table 3 Final principles in priority order.		
Rank	Previous	Design Principle
1	New	The design must maintain and, where possible, enhance current levels of safety.
2	New	The design must not require the introduction of new controlled airspace in order to be implemented.
3	2	The design must reduce the scattering effect of aircraft arrival tracks resulting from pilot visual navigation and regularise approach paths onto a predetermined, published route to the existing final approach bringing certainty to local residents and other airspace users.
4	7	The design shall benefit from collaboration with other Scottish airports and NATS to ensure it is compatible with the wider programme of lower altitude and network airspace changes being coordinated by the FASI North programme with adjacent aerodromes.
5	New	The design should minimise the impact on General Aviation including sporting and recreational aviation activity and not deny continued rights of access to existing airspace nor place restrictions on non-participating traffic.
6	5	The design should respect Cumbernauld Airport's existing noise abatement/sensitive areas.
7	New	The design shall not adversely affect designs being developed by Glasgow and Edinburgh Airports in the course of their ACPs.
8	6	The design must accommodate Performance Based Navigation traffic in line with CAA's CAP1711 Airspace Modernisation Strategy.
9	1	The design must be ICAO Doc 8168 PANS OPS compliant, validated and flyable by aircraft types in speed category A.

Note: the colours highlight how DPs moved from Table 2 to Table 3.

Appendix D

Stakeholder suggested Design Principles

BMAA	Access by GA	Proposal
	New	Sponsors must accept the assumption that GA including sporting and recreational aviation is entitled to continued safe use of airspace and that commercial aviation does not have a right to limit airspace access.
CS response		Agreed. See Final DP.5
	New	Sponsors should ensure that there will be measures to allow flexible use of airspace and prepare for the wider use of electronic conspicuity devices and interoperability with existing e-conspicuity, e.g. FLARM and Pilot Aware etc...
CS response		Agree. CS willing to embrace developing technology once approved.
NATS	DP.7	<p>– noting a benefit from low-level and network collaboration - NATS recommends that this should focus on compatibility with other change sponsors rather than just a “benefit”. NATS proposes the following wording, which is in line with other approved Design Principles from change sponsors working alongside/ as part of FASI-S and FASI-N:</p> <p><i>“The design must be compatible with the FASI-N (Future Airspace Strategy Implementation – North) route network and be coordinated with adjacent airports”.</i></p> <p>This will allow design options to be qualitatively assessed against this statement during the Stage 2A Design Principles evaluation.</p>
CS response		Agreed. See Final DP.4 as the 3 ahead were judged higher priority.
	DP.0	<p>NATS would suggest an additional overriding Design Principle 0 (DP0) to cover the maintenance or improvement of safety standards. As covered in CAP1616, ensuring safety should be fundamental to any proposed airspace change. NATS recommends the addition of the following:</p> <p><i>“DP0: The design must maintain, and where possible enhance, current levels of safety”</i></p>
CS response		Agreed. See Final DP.1
		NATS would assign draft Design Principles DP0 (suggested safety addition), DP1 (PBN OPS), DP6 (AMS) and DP7 (FASI-N compatibility) with the highest priority and the others a medium priority.
CS response		<p>Noted.</p> <p>DP.1 became Final DP.9 as CAA will not approve a design not in compliance.</p> <p>DP.6 became Final DP.8 due to competing priorities.</p> <p>DP.7 became Final DP.4 as the 3 ahead were judged higher priority.</p>

GATCO		would wish to prioritise design principles 1, 6 and 7 and believes that principle 7 is essential in order to provide a safe ATC service.
CS response		Agreed. DP.1 became Final DP.9 as CAA will not approve a design not in compliance. DP.6 became Final DP.8 due to competing priorities DP.7 became Final DP.4 as the 3 ahead were judged higher priority.
Glasgow		We assume that the ordering of the list of DPs does not imply any order of priority, if this were the case, we would ask that DPs relating to integration with Glasgow Airport operation and the associated airspace be provided a high priority. Please can you clarify this point?
CS response		Agreed. The original order was not prioritised.
		We note that there is no DP relating to safety and its priority over all others specifically and would recommend that this is considered as a DP
CS response		Agreed. See Final DP.1 which was seen as the top priority by others as well.
	DP.3 & 4	Although not directly relating to Glasgow Airport, it may be useful to note that Cumbernauld may wish to consider a wider remit than people overflown if the intention is that this addresses noise impact. It might also be worth understanding how you might measure performance against visual intrusion if DP4 is taken forward
CS response		Noted. On reflection both DPs were dropped as unlikely to be attainable.
	DP.7	We request that the word “should” be replaced by “shall” and that the following sentence be added: “Designs shall not adversely affect designs for the wider network or local designs being developed by Glasgow or Edinburgh Airports in the course of their ACPs”
CS response		Agreed. Wording updated to reflect proposal.
BGA	New	Plan GNSS approaches to minimise impact on GA including sporting and recreational aviation and to ensure their continued right of access to the airspace.
CS response		Agreed. See Final DP.5
LAA	DP.8	The area in consideration is within a frequently used VFR corridor, restricted in both width and altitude, arising from airspace allocated to adjacent airports and that ideally should be increased in both dimensions as part of this ACP, and in the respective airports ACP's, as a risk reduction action.
CS response		Noted
	DP.9	Additional “controlled airspace” should that arise, would be unacceptable under the current situation, as in the above point, as it would potentially close off the only available over land VFR routing north south that is outside of CAS.
CS response		Agreed. See DP.2
	DP.10	The implementation should not negatively impact the mainly VFR traffic using the airspace in the vicinity of Cumbernauld and the airport.

CS response		Agreed See DP.5
	DP.11	The LAA consider Class G to be the default and any change requires justification. The LAA require airport operators to restrict airspace to the minimum commensurate with safety, for all users and non-users of that airspace.
CS response		Noted. No new airspace planned.
	DP.12	The provision of a PBN approach is a positive benefit to potential users and the functionality of the airport and it is to be hoped that the amended LOA with Glasgow airport will facilitate this in a simple manner.
CS response		Noted
PPL/IR	New	- the use of the approaches should not place restrictions on non-participating traffic
CS response		Agreed. See DP.5
	New	- at least one approach procedure should be designed that does not require RF leg capability
CS response		Noted. Detailed technical design work will not commence until later in the process.

Appendix E

Engagement Record

Cumbernauld Airport CAP1616 Step 1B Engagement record sheet						
This document sets out details of all organisations contacted with a request to consider a list of draft Design Principles. The start date was Tuesday the 8th February 2020 with a deadline of Thursday 3rd March 2020. Due to the poor level of response this deadline was extended to Sunday 5th March 2020 and individual contacts made to try to garner a wider response. Dates of reminders and responses along with salient aspects of any reply are set out below.						
Organisation	Representative	e mail contact	Date of reply	Date of remind	Date of reply	Comments
Airlines UK		at jet2.com	NI	08/03/2020	09/03/2020	I have asked the question to the Airlines UK membership if anybody has any objections or comments to make on the proposed design principles for this airspace change
Airspace4All		at airspace4all.org	NI	08/03/2020	3/03/2020	We have no objections to the proposal
Airport Operators Association (AOA)		at ltn.aero	NI	08/03/2020		NI
Airport Operators Association (AOA)		at humberair.co.uk	NI	08/03/2020	09/03/2020	I am no longer the AOA's smaller Aerodromes member on NA MAC
Airfield Operators Group (AOG)		at oldbuck.com	NI	08/03/2020	08/03/2020	I found nothing to criticise in your previous and hope that you achieve your aims
Aircraft Owners and Pilots Association (AOPA)		at aopa.co.uk	NI	08/03/2020	/03/2020	NI
Airspace Change Organising Group (ACOG)		at acog.aero	8/02/2020	Not req'd		Owing to our position as an independent and impartial organisation with regard to ACPs, it would not be appropriate for ACOG to respond at this point
Association of Remotely Piloted Aircraft Systems UK (ARPAS UK)		at arpas.uk	NI	08/03/2020		NI
Aviation Environment Federation (AEF)		at aef.org.uk	NI	08/03/2020		NI
British Airways (BA)		at ba.com	NI	08/03/2020		NI
Bae Systems		at baesystems.com	NI	08/03/2020		NI
British Airline Pilots Association (BALPA)		at balpa.org	NI	08/03/2020		NI
British Airline Pilots Association (BALPA)		at balpa.org	NI	08/03/2020	0/03/2020	BALPA does not wish to comment specifically on this airspace change engagement but is supportive of the design principles
British Balloon and Airship Club		at btinternet.com	NI	08/03/2020		NI
British Business and General Aviation Association (BBGA)		at bbga.aero	NI	08/03/2020	08/03/2020	NI
British Gliding Association (BGA)		at bga.co.uk	04/03/2020	Not req'd		Plan GNSS approaches to minimise impact on GA including sporting and recreational aviation and to ensure their continued right of access to the airspace
British Helicopter Association (BHA)		at britishhelicopterassociation.org	8/02/2020	08/03/2020	3/03/2020	I am not going to get back into the of ice prior to your deadline to access your paperwork. I passed all the details onto the Bristol SAR Manager and PDG Helicopters who are the BHA members most concerned and I expected them to give you
British Hang Gliding and Paragliding Association (BHPA)		at bhpa.co.uk	NI	08/03/2020	3/03/2020	As a general rule, we ACP sponsors should plan GNSS approaches to minimise impact on GA including sporting and recreational aviation and to ensure their continued right of access to the airspace
British Microlight Aircraft Association (BMAA) / General Aviation Safety Council (GASCO)		at bmaa.org	9/02/2020	Not req'd		Please find attached our response which sets out the BMAA's position for ACP design Principles
British Model Flying Association (BMFA)		at bmfa.org	NI	08/03/2020		NI
British Skydiving		at britishskydiving.org	NI	08/03/2020		NI
Drone Major		at dronemajorgroup.com	9/02/2020	Not req'd		NI
Edinburgh Airport		at edinburghairport.com	NI	08/03/2020	3/03/2020	I have no comment on the design principles as they all seem relevant and straightforward. As the new approach procedure will remain outside controlled airspace and be infrequently used, I have no objection. This is an appropriate solution for
General Aviation Alliance (GAA)		at yahoo.co.uk	NI	08/03/2020	09/03/2020	As a member of NA MAC, I support the comments you have from BGA.
Glasgow Airport		at glasgowairport.com	NI	08/03/2020	0/03/2020	Please see below our feedback on the Cumbernauld Design Principles
Gu Id of Air Traffic Control Officers (GA CO)		at gatco.org	NI	08/03/2020	3/03/2020	Please find attached our response from Vice President Policy. No issues on our part for the time being. Generally, we have been very supportive of any PBN approach initiatives around the UK
Heavy Airlines		at fly virgin.com	20/02/2020	Not req'd		Provided this proposed ACP has no impact on or for commercial air transport operations at Glasgow Intl Airport, then on behalf of the NA MAC 'Heavy Airlines', I have no comment
Heliair Cumbernauld		at heliair.com	NI	08/03/2020		NI
Helicopter Club of Great Britain (HCGB)		at hvelands.net	NI	08/03/2020	08/03/2020	As I was just an instrument approach in Class G airspace, we're happy with that.
Honourable Company of Air Pilots (HCAP)		at airpilot.org	NI	08/03/2020	/03/2020	I circulated your proposal for comment within the Air Pilots. None came back to me with comments so you should assume that we have none at this time.
Iprosurv		limited@gmail.com	NI	08/03/2020		NI
Isle of Man CAA		at gov.im	NI	08/03/2020		NI
Light Aircraft Association (LAA)		at laa.co.uk	8/02/2020	Not req'd		Please find attached a draft submission for the Cumbernauld ACP as requested
Low Fare Airlines		at easyJet.com	NI	08/03/2020		NI
Military Aviation Authority (MAA)		at @mod.gov.uk	NI	08/03/2020		NI
Ministry of Defence Defence Airspace and Air Traffic Management (MoD DAA M)		at mod.gov.uk	NI	08/03/2020	3/03/2020	The MOD has no comment on your design principles
NA S		at nats.co.uk	NI	08/03/2020	3/03/2020	NA S supports and agrees with all seven draft Design Principles, aside from DP7 covered below, and do not have any comments or suggested changes to them.
NA S		at mod.gov.uk	NI	08/03/2020		NI
Navy Command HQ		at pdghelicopters.com	NI	08/03/2020		NI
PDG Helicopters		at pdghelicopters.com	NI	08/03/2020		NI
Phoenix Flight Training		at hotmail.com	NI	08/03/2020		NI
PPLIR (Europe)		at pplir.org	NI	08/03/2020	5/03/2020	We welcome the initiative to establish GNSS IAPs at EGPG
PPLIR (Europe)		at tdn email	NI	08/03/2020		NI
UK Airprox Board (UKAB)		at airproxboard.org.uk	8/02/2020	09/03/2020		Although a member of NA MAC, my close affiliations to CAA mean it's not appropriate for me to comment on airspace changes so I won't be responding further
UK Flight Safety Committee (UKFSC)		at ukfsc.co.uk	9/02/2020	Not req'd		Whilst I will not offer a view on priorities, the draft Design Principles appear to be a very sensible basis on which to base the PBN procedure, and I note in particular the intention to collaborate with the FAS(N) work
United States Air Force Europe		at usaf.mil	NI	08/03/2020	0/03/2020	As such please accept this email as a USAFE UK 'No Comment' response to your CAP 6.6 Step b
(3rd Air Force Directorate of Flying (USAFE (3rd AF DOF)))						

Appendix F

Typical Britain Norman Islander aircraft which are maintained at Cumbernauld.

