



Cotswold Airport (Kemble) Airspace Change Proposal for a Defined Approach Procedure



Consultation Review Document

CAP 1616 Stage 4, Step 4a

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Annex A – List of Stakeholders Consulted

Annex B – Consultation Online Survey Questions

Annex C -

<https://airspacechange.caa.co.uk/umbraco/Surface/PublicSurface/DownloadDocument/1872>

Annex D – Citizen Space (Extracted) Summary of Consultation Responses

Annex E –

<https://airspacechange.caa.co.uk/umbraco/Surface/PublicSurface/DownloadDocument/1871>

Annex F - Social Media Analysis

References:

- A. The Consultation Strategy.
<https://airspacechange.caa.co.uk/umbraco/Surface/PublicSurface/DownloadDocument/1539>
- B. The Consultation Document on Citizen Space:
<https://consultations.airspacechange.co.uk/cotswold-airport/cotswold-airport-kemble/>

Introduction

1. This document is prepared according to the regulatory requirements of the UK Civil Aviation Authority for changing airspace design in accordance with Civil Aviation Publication (CAP) 1616. This document forms part of the document set created in accordance with the requirements of the CAP1616 Airspace Change Process for Step 4a. It presents the categorisation of responses following Cotswold Airport's consultation of its Airspace Change Proposal to its stakeholders¹ building on the collate and review of responses in Step 3d to Stage 3.
2. The aim of the consultation was to provide all stakeholders with consistent information regarding the proposed airspace change and describing the assessed effects of this change. This proposal does not create new airspace, nor a change local airspace classification, but a formalisation of activity that already exists.

Consultation (*We Asked*)

3. The change sponsor, in agreement with the Civil Aviation Authority (CAA)², completed an eight-week consultation, from the 10 February to the 6 April 2020, with targeted stakeholders. These stakeholders have been consistent throughout the CAP 1616 process and are detailed within Reference A, which describes the focus and scope of the consultation and justification/need for the proposal.
4. A total of 36 targeted consultees in addition to 9 local MPs and the NATMAC Members (37) were also included in the list of Consultees. The complete list of all stakeholders is at Annex A. Due to the media used for consultations and proliferation of social media platforms many others, beyond the targeted list, also had the opportunity to read the consultation material and respond.
5. A consultation document was provided to all stakeholders on Citizen Space (Reference B) and provided as an electronic copy direct to the local parish councils, via the airport's parish council liaison committee chair. The consultation began on the Monday 10th February 2020 and ended on Monday 6th April 2020. It was conducted via the CAA Airspace Portal, hosted from Citizen Space, with a Consultation Document (Reference B) to explain the proposal (*Why we are consulting*), together with an online questionnaire (Annex B) that allowed consultees to respond and provide their view (*Give us your views*). A hard copy of this was also available as an annex to the Consultation Document and provided to the local Parish Councils.
6. All stakeholders were emailed on the 10th February 2020, notifying them that the consultation was now open with a brief explanation about the proposal, with a link direct to the CAA portal, asking for their views. At this point, both the Airport's Facebook and Twitter

¹ A person with an interest or concern in something, especially in business.

² Via successfully passing through the Consult Gateway on the 31 January 2020.

accounts were used to also publish the same message. The Editors of Flyer, Pilot and Light Aviation Magazines were also contacted and published this within their online news feeds.

7. A subsequent follow up email was sent to all stakeholders on the 9th March 2020 and corresponding Facebook and Twitter announcements made, reminding all that they had 30 days remaining to respond. A further follow up email to all those targeted consultees who had not yet responded was sent on the 30th March 2020, reminding them they had one week remaining to respond.

8. Throughout the period, a display board was placed within the entrance to AV8, our airport restaurant, and within Flying Operations to advertise the consultation and ask for views, from both our locals and pilots. A parish council liaison committee was scheduled, and meetings held between the main liaison committee attendees and a separate meeting with Crudwell Parish Council representatives, due to a diary clash. The consultation was also on the Kemble and Ewen Parish Council Meeting agenda on the 14th February 2020 and minutes are available on the Kemble and Ewen Parish Council website³. The consultation was also mentioned at the 10th March 2020 meeting.

9. A separate meeting was scheduled with Swindon Borough Council but delayed due to COVID-19. The Swindon Borough Council meeting is classified by the change sponsor as out of scope for this proposal, focussed towards mutual business development after the successful adoption of a PBN approach; the detail to explain this is within Swindon Borough Councils Consultation response (line 49 to Annex C). For this reason, the consultation was not extended to facilitate this meeting.

Summary of Consultation Responses (You Said)

10. In order to assess reach and success of the strategy, analysis has been conducted from both formal responses via the CAA portal, additional emails by those that either supported, but did not wish to formally respond, or were not concerned to respond and the reach of our social media and PR. A Consultation log (at Annex D) was kept throughout the consultation to account for emails, meetings and other interaction with stakeholders. This did not include every formal response, since these were collated through Citizen Space and the extract is at Annex C.

11. All formal responses were made via the CAA Airspace Change Portal. Although emails were sent on the three occasions listed in paragraphs 5 and 6, seven consultees chose to respond by email and did not wish to formally respond. Equally, analysis of both our Facebook and Twitter announcements, which mirrored the three announcements articulated above, demonstrated a much wider socialisation of the consultation than just our targeted list of consultees. This was supported further by new announcements made within the online presence of Flyer Magazine, Pilot Magazine and the LAA's Light Aviation site. Social Media and Magazine announcements are contained at Annex E. Despite the breadth of social media reach and the number of associated URL clicks on the Consultation Site, this appears to have only generated a relatively small number of additional formal responses. In summary:

a. **Facebook:** 4523 people reached (people that read the post), generating 145 URL Clicks to the consultation website.

b. **Twitter:** 2567 people read the tweet, 137 actively engaged and 98 clicked the URL to take them to the consultation website.

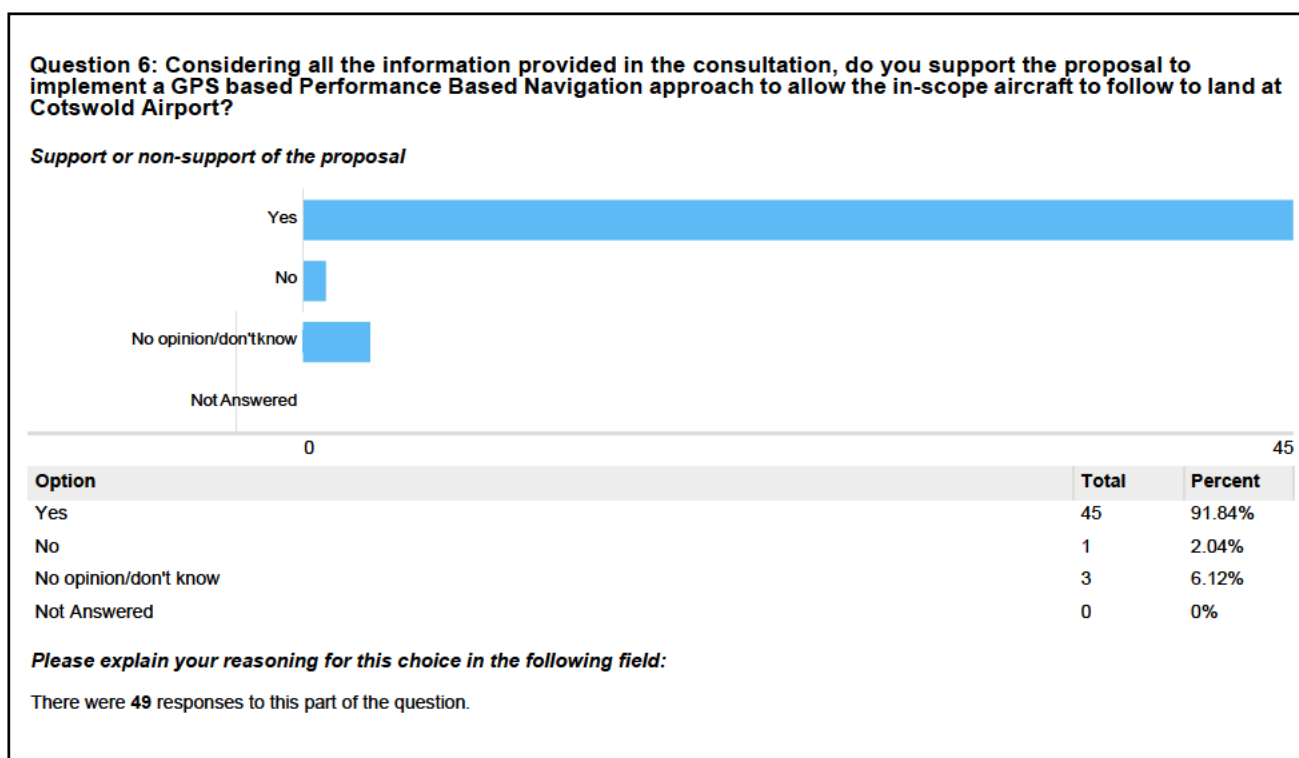
12. Numerical analysis of formal responses (Annex C), shows:

³ https://www.kemble.co.uk/images/ParishCouncil/Minutes/2020/Minutes_14Feb2020_final.pdf

- a. 16 of the 36 Targeted Consultees responded.
- b. 0 of the 9 MPs responded.
- c. 9 MATMAC Members responded.
- d. An additional 24 people responded, mostly from either local residents or from the GA community.

13. The consultation received 49 formal responses, 7 emails, across the local area, regionally and nationally, see postcode map at Annex F. In addition to three parish councils' responses (1 formally, 2 informally via email), 8 individual local residents responded separately. Importantly, Cotswold District and Gloucestershire and Swindon Borough Councils all responded. Sadly, neither Wiltshire Council nor any local MPs responded, although many are outside the affected area.

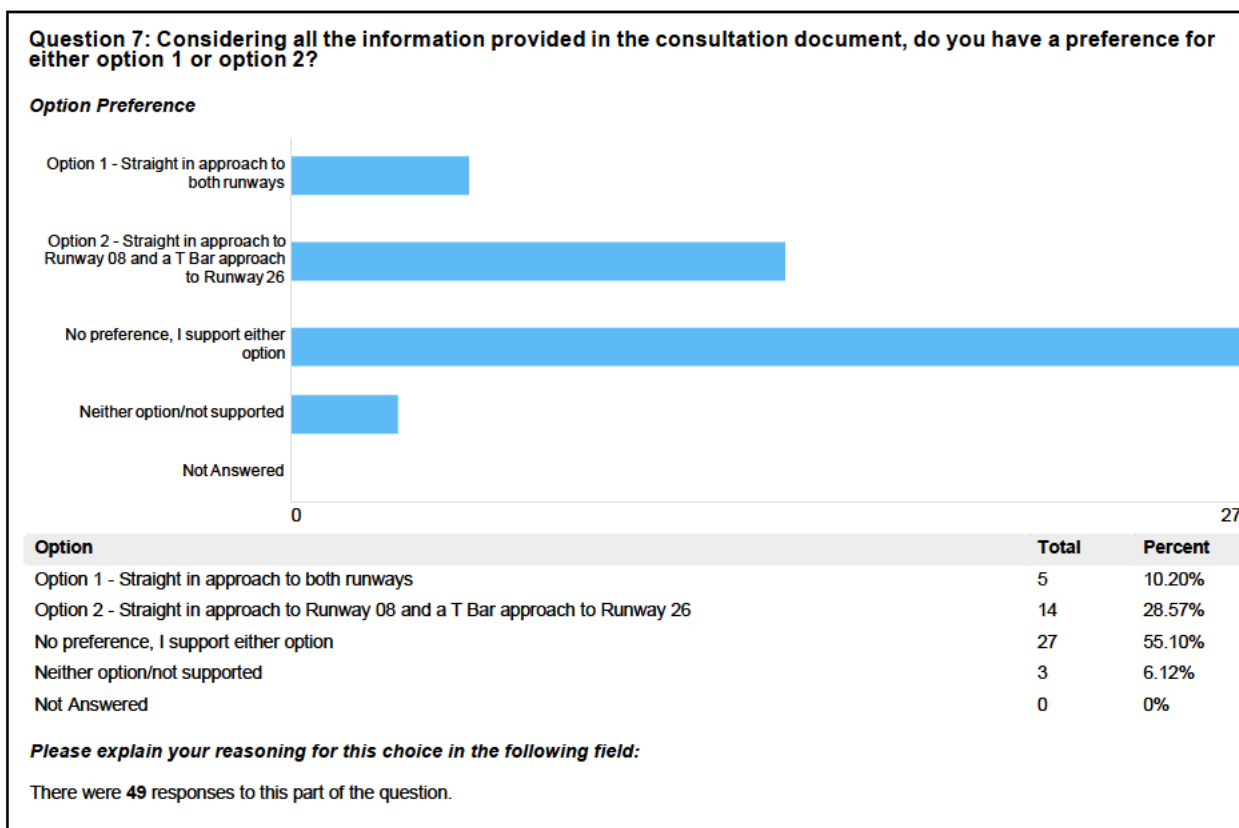
14. From the 49 formal responses, 45 (91.84%) supported the proposal, one person rejected the proposal and 3 provided a neutral (no opinion/do not know) response, although the supporting text was supportive, see Annex C. All responses utilised the additional comments boxes to add either context for further support to their decision. This has been immensely useful for the Change Sponsor. Whilst acknowledging many of the supported and impassioned comments from the GA community of the pace and propagation of PBN/GNSS approaches in the UK, these comments were not believed to be aimed at this this proposal specifically. The below graph has been extracted directly from the Citizen Space site, which hosted the consultation, and shows overall support for the proposal:



15. One response did not support the proposal, pointing to safety and ATM concerns of an AFISO unit operating a PBN/GNSS approach. The responder was right to raise these concerns, all of which have been enshrined within the CAA's CAP1122 document, which although no longer published, has provided the safety framework for many AFISO (and A/G) unit's applications for a defined GNSS approach. Within CAP 1616, the framework for consultation does not include CAP 1122 details. Furthermore, this is not new information; all of what was

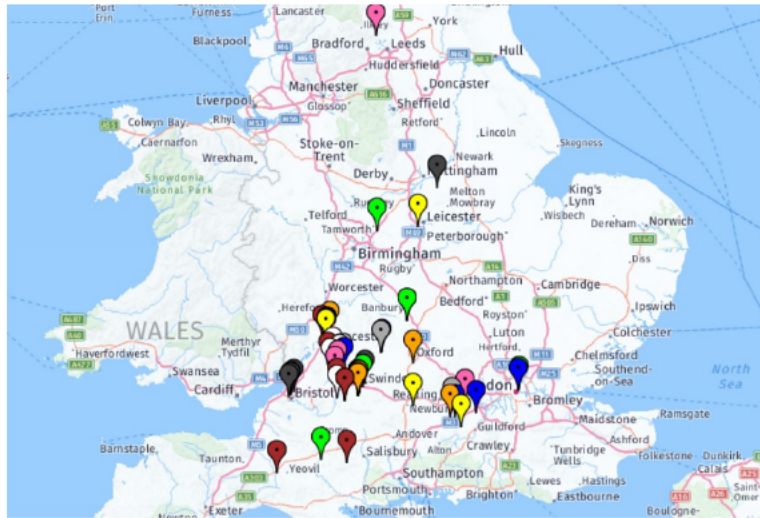
commented upon has already been addressed within the bowtie safety assessment framework and will be included in the safety case to support the CAP 1616 Final Appraisal. These comments, although useful, are not considered to impact the final proposal.

16. Within the question set (Annex B) and Reference B, we also asked responders if they preferred an option (1 or 2) or had no option preference. Most simply expressed option agnostic support, but Option 2 received the most option support. Very usefully, all responders completed the comments boxes to add reasoning behind their selection. Although much of this was simply supportive, some comments added confirmatory, yet different perspective to the Change Sponsors analysis, which is very welcome. The picture below is extracted from Citizen Space and shows this graphically:

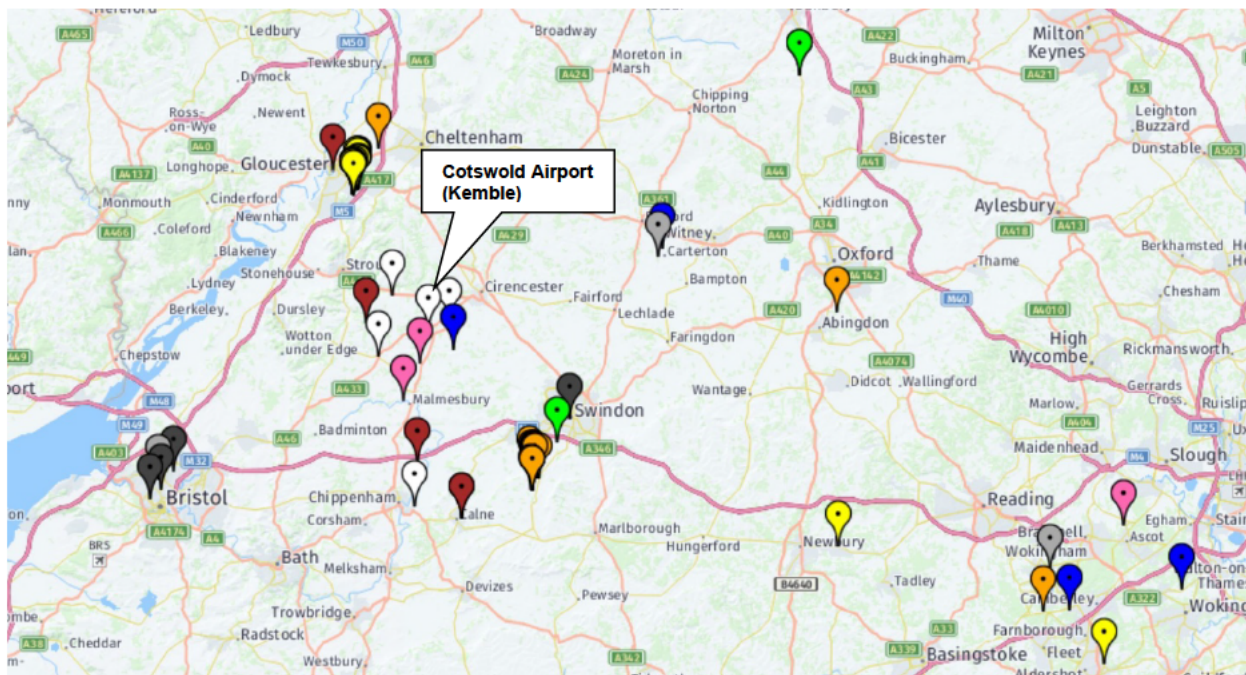


17. Despite encouragement to all to formally respond, some elected to simply express support via an email. From the email responses, all either expressed support for the proposal or that the proposal was not considered to sufficiently impact to warrant expression of a formal response. For transparency and completeness, these emails are included within Annex C.

18. Analysis of submitted postcode from each formal response has highlighted a much wider engagement area than would be expected from the list in Annex A, this is a product of social media and online magazine presence. It does show good representative regionally and within the areas underneath the proposals flight track, albeit each point is a single response, which in many cases accounts for a County or Parish council response on behalf of their citizens. Correlation between response and plotted postcode suggests most of the outliers are from within the GA community. The plotted map of all consultation responses and those within the local region are shown below:



All Consultation Responses



Consultation Responses Within the Local Region

Categorisation of Consultation Responses (*We Did*)

19. All responses to the consultation are included in a table at Annex C, along with Change Sponsor comments and/or justification where there is no impact on the final proposal and/or any action required by the sponsor. Some comments comprised of more than one element and, while there was no criticism of the consultation, a theme of responses from the GA and glider community were critical of the lack of progress in similar PBN approaches for GA aerodromes. Analysis and change sponsor comment (Annex C) identified that only one response may impact the final proposal, which although was only a suggestion, we have taken on board to review the designs to increase altitude of the missed approach. Most responses contained useful and relevant comments, although most we simply supporting the analysis within the Consultation Document.

20. The Full Appraisal and Consultation Strategy both highlighted that those most affected by this proposal was likely to be GA and other airspace users. More than half (31) of all responses received were from the GA and glider pilot community, including the British Microlight Aircraft Association (BMAA), General Aviation Alliance (GAA), British Gliding

Association (BGA) and business jet operators. All these responses provided strong support for the proposal, particularly the BGA, offering some very useful comments or support for a particular option.

21. One response, from the BMAA was identified as sent in error. Faced with many new ACPs, some organisations have proactively defined their own Design Principles (DPs) for inclusion within Stage 1 of an airspace change. The BMAA response included this 'standard' DP response, along with a no opinion response, rather than reading the document and responding to the Consultation Document (Stage 3). The change sponsor monitored responses daily, so quickly emailed the responder to confirm the error with the BMAA, the email is included at Enclosure 1 to Annex C. It has thus been discounted as out of scope. As a note, the BMAA were engaged in Stage 1 of this ACP through the NATMAC group, but no response was received. However, the theme of the relevant⁴ BMAA offered DPs for consideration do match those used by the change sponsor during Stage 1 in 2018.

22. **Responses which May Impact Final Proposals.** One response was categorised as having the potential to impact of the final proposals. This was not new information, but a suggested idea, that the change sponsor believed could be adopted in the designs. The response idea was "Perhaps the missed approach Altitude could be higher than 2300 feet considering the track miles of the circuit; only descending to 2300 feet on the return cross leg?". This idea prompted a review of the missed approach altitude and thus to the Initial Approach Fix altitude. The APDO is now developing this into the development of the approach designs, increasing both missed approach and IAF altitude to 2500ft.

23. **Responses Which Do Not Impact Final Proposals.** As already stated, only one response impacted the final proposal, the majority either supported it or were neutral, however, the following responses have been identified as containing useful and relevant comments.

a. **GNSS Outage.** The comment on reversionary mode is noted and will be included in the Final Appraisal and Safety Case. In this instance, the failure of GNSS Signal in Space (SiS), would be one of the factors that would temporarily suspend the use of the procedure until the SiS can be verified, defaulting back to the current operations of pilots self-defined routings. Our Approved Procedure Design Organisation (APDO) is providing a GNSS monitoring station, which has been gathering SiS data for the past 16 months. Data has shown a consistent 98.8% performance for both APV-I and LPV-200. Although a reversionary mode is required, I assess the risk of this as very low to minimal, based on the data we have been gathering and analysing on GNSS performance. This is known information; thus, this response was assessed as not impacting the final design.

b. **BGA/GAA response.** Very welcome support from both the GAA and BGA; a product of much CAP 1616 engagement. Accessibility to all GA airspace users is theme that has surfaced in 10 other responder comments, is currently out of scope for this ACP, due to both the ability to safely integrate, in accordance with CAP 1122 and the assessed level of regulatory support for approval. However, it is noted and must be considered post validation (Stage 7) as this demand remains. The two highlighted concerns regarding both South Cerney and the temporary Class D airspace to safeguard our royal flights are noted, both out of scope for this ACP and an action for further development by the CAA. That aside, we previously highlighted the South Cerney/ artificial choke point concern to the CAA, in both direct interaction and within our Bowtie and safety arguments.

⁴ Not concerned those related to changes to controlled airspace.

c. **Ministry of Defence (MoD) Response.** The specific detail contained within the MoD response is known and already the subject of either, the extant Letter of Agreement (LoA) or previously identified within the Bowtie and is noted for refinement of the LoA before submission of the proposal. However, the comment regarding consideration of the Brize Norton ACP is an interesting one. The final shape and size of this enlarged airspace is not yet approved. Whilst acknowledging the RAF Brize Norton ACP, it is not unreasonable to suggest that integration of current (these aircraft already arrive and following similar general routings that this proposal aims to define) and planned operations within uncontrolled airspace is an issue their ACP will need to address, if it wishes to enlarge its own controlled airspace into areas where this activity already takes place.

Conclusion and Next Steps

24. The targeted 8-week consultation has been deemed successful by the change sponsor, who is extremely grateful to all those who took the time to consider and respond to this consultation. Furthermore, both specific meetings with local parish councils and social media enabled a much wider reach to all stakeholders. Social media provides very useful analysis tools to measure reach, although not all translate into formal responses and no direct association can be made.

25. All, but one, responses support the proposal with no negative impacts raised and only one change has been identified (raise the IAP and missed approach altitude above 2300ft) that would suggest any revision to the previously submitted designs. This comment has been welcomed and acknowledged; it has now been passed to our ADPO for incorporation into Stage 4. Within the support many expressed theme of frustration regarding both the tempo and scale of GNSS adoption in the UK and focussed on regulatory authorities. Although not within the change sponsors control, this is understood, and this proposal will continue to be developed at pace to help deliver this.

26. If the proposal is approved, business jet operators and airlines bring aircraft into the Maintenance and Repair Organisation (MRO), will be able to plan and schedule arrivals into Kemble with confidence, thus making it a more attractive destination and MRO. The based MRO will have less commercial uncertainty, which will, in turn, help to local economy and contribute to the development aspirations of Gloucestershire LEP, Swindon Borough Council and the airport. In contrast, if the proposal is not approved, the airport will continue to stagnate and be able to fulfil its level of business jet demand and the impact the ongoing attractiveness of the based MRO to compete against MROs based at airports which have had their instrument approaches approved.

27. For the next stage, Stage 4 Update and Submit, the only minor change will be to the IAP and missed approach altitudes, which the APDO is already calculating. At this stage, the change sponsor's agreed ACP timeline, due to constraint of COVID19, has an agreed delay until the 17 Jul 2020 for final submission.

28. Given the scaled nature of this proposal and its uncontroversial passage through consultation, it is hoped the CAA can move swiftly and positively through the decision process to approve the proposal. Its implementation, recognising the increased importance of an instrument approach in the winter months, when the MRO and business jets seek to be the busiest.

Reversion Statement

29. Should the proposal be approved and implemented, factors may arise that might require Cotswold Airport to temporarily or permanently withdraw the procedure and revert to the pre-implementation state. Whilst not ideal, withdrawal of the procedures would return operations at

the airport to the current state, with no instrument procedures available. This would re-introduce all the operational uncertainties of operating at an airport without a defined approach, such as irregular, pilot determined approach routes, with both the associated increased risk and economic uncertainty.