LAND'S END AIRPORT

CAP 1616 – AIRSPACE CHANGE PROPOSAL

FOR THE

LAND'S END TRANSIT CORRIDOR

-

STAGE 1B : DESIGN PRINCIPLES

ID : ACP-2019-75

LAND'S END AIRPORT

ACP SUBMISSION STEP 1B : DESIGN PRINCIPLES

JUNE 2020

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1. Introduction

Land's End Airport are submitting this formal submission to the Civil Aviation Authority on 12th June 2020.

This formal submission has been compiled by Land's End Airport according to the CAA's Guidance on the Application of the Airspace Change Process, document reference CAP 1616.

2. Executive Summary

Land's End Airport is proposing to introduce an improved airspace solution to the Land's End Transit Corridor (an existing block of airspace linking the mainland to the Isles of Scilly) that could provide mitigation to the current unknown traffic environment. With an increase in air traffic movements in the Land's End Transit Corridor, the commencement of a second commercial operator (Penzance Helicopters) and the introduction of multiple IFR approaches (with more planned) a need for an Airspace Change was identified.

The owner of Land's End Airport, the Isles of Scilly Steamship Company (ISSC), has been providing lifeline services between the mainland and the islands for over 100 years. Air services provide a year-round lifeline link between the mainland and the Isles of Scilly and this proposal represents the final stage of a major investment program for the benefit of the island-based community and visitors.

This proposal is related to improving the safety of existing services and not about stimulating new traffic or altering any existing routes.

3. Operational Requirements

a) Operational Aim

Land's End Airport Ltd has identified the need to improve the unknown traffic situation in the Land's End Transit Corridor (LETC).

To achieve this aim, one option would be for all users intending to fly within the LETC to be in radio contact with air traffic control (ATC). Since the LETC also falls within the Western section of the Culdrose AIAA, and as another possible option, it would also be advantageous if all aircraft were visible to RADAR. The ACP will take into account both of these desired outcomes as it is discussed and developed throughout the coming months.

This ACP will follow the regulatory process for changing airspace design including community engagement requirements, set out by the CAA in CAP1616.

b) Airspace Description

The Land's End Transit Corridor is situated in the far South-West of England and is an established block of airspace approximately 38nm long and 15nm wide (Surface to 4,000ft altitude) linking the mainland to the Isles of Scilly. This existing airspace is illustrated in Appendix A.

The LETC is situated in Class G airspace and partially within the RNAS Culdrose AIAA.

The LETC is used predominantly by scheduled passenger and freight carrying flights - both fixed-wing and, as of March 2020 from Penzance Heliport, rotary aircraft. In addition, it is used by military aircraft (both fixed-wing and rotary), SAR & Helimed helicopters, Trinity House helicopters, General Aviation flights and other charter and air-taxi operators.

Aircraft using the LETC become funnelled within a very narrow lateral and vertical area of airspace. In order to provide increased protection for all users, and in particular, the scheduled public transport flights - some of which may be conducting IFR RNAV approaches - a need for an airspace change was identified.

Air Traffic Control Officers (ATCO's) at Land's End Airport and St. Mary's Airport oversee the safe, orderly and expeditious flow of aircraft using the LETC. The current LETC operation is further enhanced by an existing Letter of Agreement made between Operators and Land's End and St. Mary's ATCU's. An additional specific Letter of Agreement between Land's End ATCU and RNAS Culdrose ATCU details the procedures for when the Land's End RNAV approaches are in use.

There are now four Airports/Heliports situated within the LETC – Land's End Airport, St. Mary's Airport, Penzance Heliport and Tresco Heliport. All these destinations are served by CAT transport and all have, our intend to have, their own IFR RNAV or PIN's approaches.

Land's End Airport handled 15,042 aircraft movements (11,177 Airport Movements and 3,865 Overflights) and 64,000 terminal pax in 2019 (Jan-Dec). This makes it the 36th busiest Airport in the UK.

St. Mary's Airport handled 12,329 Airport Movements and 94,000 terminal pax in 2019 (Jan-Dec). This makes it the 35th busiest Airport in the UK.

c) Safety Constraints / Opportunities

As previously stated, the LETC is situated with the RNAS Culdrose AIAA and any changes will need thorough consultation and close co-ordination.

The ATCO's at Land's End and St. Mary's Airport's do not have radar and so routinely provide a Basic Service. St. Mary's Airport are also able to provide an Approach Procedural Service. These two types of ATC services rely on aircraft making contact with the ATC Unit's to advise them of their presence – without this, an incomplete traffic situation is presented. In Class G, there is no obligation for pilots to contact an ATC Unit so an unknown environment is created. As a contingency, both RNAS Culdrose and Newquay ATC Unit's have Radar and, subject to their opening hours, own workload and on request, may assist with specific scenarios.

IFR traffic in the LETC is closely coordinated between all adjacent ATCU units. In addition, Land's End Airport has a SSR code allocation (4501) for traffic flying the Land's End RNAV approaches. If all aircraft intending to operate within the LETC were visible to radar, an enhanced ATC service - and therefore safety - could be attained.

If the operational aim is achieved, aircraft operating within the LETC will receive an improved ATC service. In particular, there will be increased safety for the Commercial Air Transport Operators and aircraft flying the RNAV / PIN's approaches.

d) Operational Impact

It is known that aircraft do operate within the LETC without contacting any ATCU. This is frequently demonstrated by pilot RTF reports, and on occasion, SMS, MOR or Airprox reports. Therefore, if radio contact was mandated, there would be a small increase in aircraft requesting an ATC service. However, it is expected that the increased workload experienced during the sighting of an unknown aircraft, by a pilot or ATCO, would balance this out.

Any operational procedure changes would be addressed by updating the existing Letters of Agreement between adjacent ATCU's and frequent airspace users. However, there are not any major changes expected as the aim for any airspace change will be to minimize the change to current procedures and/or aircraft routing.

In addition, any change would have to be well publicized and promulgated – ie on aeronautical charts, AIP updates, Airport websites, local poster promotions. For aircraft

inbound to Land's End Airport and/or St. Mary's Airport, PPR (Prior Permission Required) is required by telephone which will also provide an opportunity to advise/educate pilots of any changes. These actions should help raise awareness between pilots and prevent any inadvertent breaches of any change.

RTF coverage has been improved recently - Land's End Tower (120.255 Mhz) now has a DOC of 30nm and 8,000ft (previously 25nm/4,000ft). This enables Land's End ATCO's to provide a service for the entire LETC when required.

If a known environment can be created in marginal or poor weather conditions, safety can be further enhanced. This will assist pilots with their "see-and-avoid" responsibilities under VFR and aid segregation in IFR conditions (ATCO's can use "Agreements" under a Basic Service and "Deconfliction Minima" under an Approach Control Service). While traffic movements are expected to be less in such weather conditions, experience has shown that other (unknown) aircraft do operate and are not necessarily in contact with an ATC Unit.

Currently, any free-calling inbound/overflying flights that may be in the vicinity of the Airport while a RNAV approach is being flown will be instructed to hold outside the ATZ and, as necessary, requested to hold clear of the approach and missed approach areas (ie hold over St. Ives).

e) Economic Impact

There are no direct economic advantages / disadvantages with achieving the operational aim. Indirectly, increasing the safety within the LETC will ensure confidence in key services such as passenger transport (tourism makes up approximately 85% of the Isles of Scilly economy), business trips, mainland medical/hospital appointments, stretcher flights, Royal Mail deliveries, and newspapers.

Any proposed change to the Airspace must be cost effective for the Airport – both in terms of initial capital cost and ongoing maintenance/running costs.

f) Safety Management

The Airport Safety Management System (covering both ATC and Airport hazards) has been instrumental with this proposal and was the safety tool that initially identified the need for a closer look at the Airspace around the Airport. Following risk assessments for the CAA "Significant Seven" events, the Airport (and its based airline "Skybus") considered this an area that could be improved on subject to a successful ACP application.

g) Technical Constraints / Opportunities

If the operational aim is achieved, a number of technical constraints/opportunities will be considered:

i) It is intended that any change will ensure that safety for users is at least maintained but ideally increased, access is maintained for all users and any impact on other users is kept to a minimum.

ii) If technical solutions are suggested – these must conform to various national and international standards and practices. Solutions may involve well used existing technology (such as radar) or emerging technology (such as ADSB surveillance).

iii) The LETC overlaps the RNAS Culdrose AIAA. Close consultation and, as/if necessary, Letters of Agreement arranged between Land's End and RNAS Culdrose.

4. Environmental Principles – Early Considerations

a) An assessment of the effects on noise

It is not envisaged that there will be any extra movements or change in aircraft types should the operational aim be implemented and therefor there will be no net increase in noise from aircraft operations.

b) An assessment of the change in fuel burn/ CO_2

The Airport is confident that CO_2 emissions and fuel burn will not increase as a result from the implementation of the operational aim.

c) An assessment of the effect on local air quality

The Airport has considered the effects that the proposed change may have on local air quality and in particular the effect on local air quality in the area surrounding the airport below 1,000 ft. The Airport has concluded that there will be no net change in air quality as there is no increase in aircraft movements from this proposal.

5. Consultation

a) Introduction

This section forms part of Land's End Airport's submission to the Civil Aviation Authority (CAA) for the Define Gateway of the regulatory process for changing airspace design (CAP1616).

The report aims to:

- Demonstrate how the engagement was conducted
- Provide evidence that the conversations held with stakeholders have created a good understanding of the design considerations that are important to different stakeholder groups.

This stage of the process concerns the development and communication of airspace design principles to be applied to the ACP. We understand that our airspace design principles should encompass the safety, environmental and operational criteria. We also recognise that the design principles must be drawn up through discussions with stakeholders at this early stage in the process.

Once evaluated by the CAA, we expect our final list of proposed design principles to form a framework that we can use with stakeholders to consider and compare all the airspace design options available to address the issues and opportunities set out in the statement of need (SON).

b) Design Principle Engagement Approach

Land's End Airport is a small but busy airport, located near the village of St Just, approximately seven miles west of Penzance. As a result of its proximity to both urban and rural areas, Land's End had to undertake to identify stakeholders that are affected by current airport operations and those that could be affected by any changes associated with an ACP.

Given that we are at the design principle stage and are not able to predetermine the full scope of any potential changes, our general approach was to consult with as many organisations as possible which included:

i) those who are currently impacted by Land's End Airport operations and selected those who could be affected by any future changes, even though those changes are expected to have negligible impact.

ii) those who may have non-aviation related opinions to ensure a full range of factors were considered.

In forming our stakeholder selection, we covered those referenced in both Appendix C of CAP 1616 and the indicative list in the CAA's engagement plan template. We also used previous ACP consultation experience to assist with the selection (ie our recent RNAV Approach ACP).

Of the 39 NATMAC organisations, we decided to consult all but those that would not be affected by this ACP. A total of 35 of these organisations were consulted – the four that were not were Airlines UK, BAe Systems, Isles of Man CAA and Low Fare Airlines. There have been no interaction with these organisations/members for at least 25 years. As expected, not many of these organisations responded (only three did so) – this is likely due to the geography, user type and low altitude of the airspace.

To ensure we were able to correctly communicate to stakeholders and potential stakeholders alike, we utilised not only email but also sent out written letters as well. We chose to write to stakeholders rather than any other approach because of the opinion that the ACP was more of a more technical change and would have a negligible effect on many of the stakeholders. The first consultation documents were sent out on the 26th March 2020 (copy of letter in Appendix B).

Due to the onset of country based COVID-19 restrictions the initial deadline for consultation was extended and invitations for stakeholder comment were resent 30th April 2020 with a final deadline of the 7th May 2020.

Notwithstanding that the consultation was targeted primarily at the listed stakeholder consultees, Land's End Airport has given appropriate community publicity to this consultation. An example of this is that we asked the local Air Safety Committee, organized by Newquay Airport, to distribute the stakeholder letter (4th May 2020).

Submissions from individuals who were not listed as stakeholder consultees were welcome and have been considered by Land's End Airport.

A total of 59 Consultation invitations were sent to stakeholder consultee organizations or individuals, comprising airlines and other local airspace users, members of the National aviation organizations represented on the CAA's National Air Traffic Management Advisory Committee (NATMAC), Councilors and Officials of County, District and Parish Councils, and other representative organizations of communities which may be affected by the proposed change. Certain environmental organizations were included, as well as the Airport's representative Member of Parliament.

The chronology of the engagement activity is summarised in the table below:

ENGAGEMENT ACTIVITY	DATE
Identifying Stakeholders	16th - 20th March 2020
Initial Consultation Documents circulated	26th March 2020
Notification of Consultation extension Circulated (COVID-19)	30th April 2020
Local Air Safety Committee circulate consultation documents	4th May 2020
Consultation Deadline	7th May 2020

Draft Design Principles with Stakeholders for comment	29th May – 10th June 2020
Submission to the CAA	12th June 2020

A list of all stakeholders or potential stakeholders that were communicated with is detailed in the following section.

c) Feedback Summary

In developing the ACP, Land's End must take into account feedback from a representative mix of stakeholders. The tables below detail the outcome of the stakeholder engagement conducted by Land's End.

Organisation	Date Sent	Medium Used	Feedback Received	Date Resent	Medium Used	Feedback Received
RNAS Culdrose ATCU	26/3/20	Email Letter	Yes – via MOD, CAA House, Gatwick	-	-	-
British Microlight Aircraft Association (BMAA)	26/3/20	Email Letter	Yes	-	-	-
Sloane Helicopters	26/3/20	Email Letter	Yes	-	-	-
Natural England	26/3/20	Email Letter	Yes	-	-	-
Environment Agency	26/3/20	Email Letter	Yes	-	-	-
St Just Town Council	26/3/20	Email Letter	Partial	30/4/20	Email Letter	No
Honourable Company of Air Pilots (HCAP)	26/3/20	Email Letter	Partial	30/4/20	Email Letter	No
St. Mary's ATCU	26/3/20	Email Letter	No	30/4/20	Email Letter	Yes
Council of the Isles of Scilly	26/3/20	Email Letter	No	30/4/20	Email Letter	Yes
Skybus Operations	26/3/20	Email Letter	No	30/4/20	Email Letter	Yes
Skybus Flight Safety Manager	26/3/20	Email Letter	No	30/4/20	Email Letter	Yes
Skybus Chief Pilot	26/3/20	Email Letter	No	30/4/20	Email Letter	Yes

Perranporth Flying Club	26/3/20	Email Letter	No	30/4/20	Email Letter	Yes
Cornwall Protection of Rural England CPRE	26/3/20	Email Letter	No	30/4/20	Email Letter	Yes
PDG Helicopters (Trinity House)	26/3/20	Email Letter	No	30/4/20	Email Letter	Yes
Tresco Estate (Tresco Heliport)	4/4/20	Email Letter	No	30/4/20	Email Letter	No
Newquay Airport ATCU	26/3/20	Email Letter	No	30/4/20	Email Letter	No
Cornwall Council	26/3/20	Email Letter	No	30/4/20	Email Letter	No
National Trust	26/3/20	Email Letter	No	30/4/20	Email Letter	No
Duchy of Cornwall	26/3/20	Email Letter	No	30/4/20	Email Letter	No
Health Watch	26/3/20	Email Letter	No	30/4/20	Email Letter	No
Island Partnership	26/3/20	Email Letter	No	30/4/20	Email Letter	No
Derek Thomas MP	26/3/20	Email Letter	No	30/4/20	Email Letter	No
35 out of 39 NATMAC Organisations	26/3/20	Email Letter	Yes – BMAA, MOD & HCAP	30/4/20	Email Letter	No Further Responses Recieved

The feedback, from the initial letter/email, is detailed in the following table:

ORGANISATION	FEEDBACK
RNAS Culdrose – Via MOD	Very keen to Consult. Gave three very good design principles: 1. Safety – should be at least as safe or safer than current 2. Access - Ensure continued access to airspace for military air systems 3. Impact to Other Airspace Users - Minimal impact to military training and operations Look forward to further consultation as this ACP progresses.
British Microlight Aircraft Association (BMAA)	Generic Letter Received. • Keep UK airspace Class G as much as possible • Consider RMZ/TMZ before controlled airspace • Easy access to all airspace by GA • Any changes should use the minimum volume of airspace
Sloane Helicopters	Detailed Response Received. Key proposals:

	a. Amalgamation of ATC provision through a 'joint ANSP' to coordinate all traffic within the LETC. b. Assimilation of all RNAV/LPV/PinS GNSS approaches within a common coordination framework to ensure best use of LETC airspace and equal priority to scheduled service operators. c. Introduction of TMZ/RMZ category for LETC. d. Implementation of ADS-B based 'surveillance' of LETC traffic fed to each operating location. e. Considerations for greater use of vertical separation (possibly raising ceiling of LETC) to give enhanced safety and sequencing of fixed and rotary-wing traffic. f. Change LETC to Class E airspace. g. Acceleration of provision of GNSS approach(es) at St Mary's in parallel with delivery of PinS approach for Tresco. h. Consideration of trial to establish vertical and horizontal coverage of Culdrose Radar at low level within the LETC and cost-benefit analysis of providing this feed within a joint ANSP for the LETC. i. Consideration for manpower/cost saving between St Mary's and Land's End ATC in event of establishing a joint ANSP funded by all LETC users. Overall, strongly support the proposal to enhance safety. Maintain close consultation as this ACP progresses.
Natural England	Prime purpose to ensure that: • the natural environment is conserved, enhanced and managed for all. • Response identifies specific areas that any changes, and their associated impacts, need to fully consider.
Environment Agency	Response states that the EA has: • no remit to comment on this ACP. Land's End will contact the EA again as the ACP progresses.
St. Just Town Council	St. Just Town Council made telephone and email contact and, as requested, the sponsor explained the ACP in more detail. The sponsor was invited to attend an evening Council meeting – but unfortunately was unable to do so. The ACP was tabled at the meeting – but no feedback was received.
Honourable Company of Air Pilots (HCAP)	The HCAP made contact by email and further details were exchanged. However, no further feedback was received.

Feedback from the second, feedback deadline extension letter is as follows:

ORGANISATION	FEEDBACK
St. Mary's ATCU	"Strong support" received: We as St. Mary's Airport and the Council of the Isles of Scilly fully support this proposal which will enhance the safety in this usually congested airspace in particular with the re-opening of Tresco & Penzance Heliports with additional CAT flights taking place.
Council of the Isles of Scilly	Shared feedback letter with St. Mary's ATCU (St Mary's Airport & ATCU is operated by the Council of the Isles of Scilly.
Skybus Operations	Response confirms "support": The changes will enhance the safety of all aircraft operating in this airspace benefitting not only the Skybus scheduled service for the Isles of Scilly, but other operators and users of this airspace.
Skybus Flight Safety Manager	Response confirms "support": As a company who operates a scheduled airline all year round from Land's End Airport and through the LETC we would find any possible improvements as a safety benefit to our operation and ultimately to our passengers.
Skybus Chief Pilot	Response indicates "full support": As Chief Pilot of the most prolific operator within the Land's End corridor I am writing to offer my full support to this proposal which will significantly enhance the safety in this relatively small yet busy area of airspace.

Perranporth Flying Club	Detailed response received – really seeking a specific solution/design to comment on. Land's End will ensure that they continue to be consulted as the ACP progresses.
Cornwall Protection of Rural England CPRE	Response confirms main concerns are environmental: • Air pollution, noise pollution and privacy violation. • Seek to reduce environmental and social harm by better operational practice. • Suggest substantial widening of the LETC so flights routed over the sea.
PDG Helicopters (Trinity House)	Response suggested that: • If any further IAP's are introduced in the LETC that this airspace should be classified as Class D with a radar service available to guarantee separation. • Thought the above unlikely on cost grounds. • Suggest Improved route structure and better vertical separation.

A copy of each stakeholder's original communication is included in Appendix C.

d) Selection & Draft List of Design Principles

As detailed above, a comprehensive list of feedback was received. Several two-way conversations were had with the stakeholders – ie the MOD, St. Just Town Council and Perranporth Flying Club - as evidenced in Appendix C. To ensure all the design principles suggested, and issues raised, are considered Land's End intends to select all points and design principles raised by the stakeholders. This will ensure that no feedback is overlooked and negates the need for Land's End to filter and evolve

The draft list of airspace design principles that we propose to adopt for the ACP are set out in the table below which incorporates all the points/suggestions received from the feedback. The design principles are numbered for ease of reference.

DP1	The airspace design and its operation must be as safe or safer than today for all airspace users that are affected by the airspace change.
DP2	Subject to the overriding design principle of maintaining a high standard of safety, the highest priority principle of this airspace change is that it accords with the CAA's published Airspace Modernisation Strategy (CAP 1711) and any current or future plans associated with it.
DP3	Ensure that all airspace users retain the ability to have safe and efficient access to the airspace.
DP4	Ensure that all possible technical solutions – both existing and emerging - are considered (ie radar, ADSB). However, such options must be affordable relative to the Airport's income – both in terms of initial cost and ongoing running and maintenance costs.

DP5	Controlled airspace options should ensure there is safe and efficient access for other types of operations, and should explore measures, including classification and flexible use of airspace, where possible and appropriate, to improve access and decrease airspace segregation.
DP6	Options should consider an RMZ and/or TMZ solution.
DP7	Ensure that any changes fully consider any environmental impact – to include noise, air pollution and social issues.
DP8	As feedback was received regarding the size of the airspace (some requesting a small volume and others a larger volume), both the height and breadth of the LETC will be fully considered.

In order to continue with our basis of consulting with stakeholders at every key stage of the ACP, we sent out these draft design principles to all the stakeholders, regardless of whether feedback was received previously or not. The tables below detail the outcome of the draft design principles letter sent out on the 29th May 2020 (copy of letter in Appendix B).

Organisation	Date Sent	Medium Used	Feedback Received
RNAS Culdrose ATCU	29/05/20	Email	
British Microlight Aircraft Association	29/05/20	Email	
Sloane Helicopters	29/05/20	Email	
Natural England	29/05/20	Email	Yes
Environment Agency	29/05/20	Email	Yes
St Just Town Council	29/05/20	Email	
Honourable Company of Air Pilots	29/05/20	Email	
St. Mary's ATCU	29/05/20	Email	
Isles of Scilly Council	29/05/20	Email	
Skybus Operations	29/05/20	Email	
Skybus Flight Safety Manager	29/05/20	Email	
Skybus Chief Pilot	29/05/20	Email	

Perranporth Flying Club	29/05/20	Email	Yes
Cornwall Protection of Rural England CPRE	29/05/20	Email	
PDG Helicopters (Trinity House)	29/05/20	Email	
Tresco Estate (Tresco Heliport)	29/05/20	Email	
Newquay Airport ATCU	29/05/20	Email	Yes
Cornwall Council	29/05/20	Email	
National Trust	29/05/20	Email	
Duchy of Cornwall	29/05/20	Email	
Health Watch	29/05/20	Email	
Island Partnership	29/05/20	Email	
Derek Thomas MP	29/05/20	Email	
Island Partnership	29/05/20	Email	
UK AIRPROX Board	29/05/20	Email	
MOD	29/05/20	Email	Yes
Fly Newquay	29/05/20	Email	
British International Helicopters	29/05/20	Email	
Bristow Group	29/05/20	Email	
Cobham Flight Academy	29/05/20	Email	
Cornwall Air Ambulance	29/05/20	Email	Yes
RNAS Culdrose Flight Safety	29/05/20	Email	
Fly Cornwall	29/05/20	Email	
Cornwall Flying Club	29/05/20	Email	
Les Potton GA Pilots	29/05/20	Email	
35 out of 39 NATMAC Organisations	29/05/20	Email	ARPAS

ORGANISATION	FEEDBACK

Manager of Air Traffic Services Cornwall Airport Newquay	"Support" Thanks Chris. For the moment we have no comments to make until your plans are firmed up. In principle we have no issue with an RMZ – indeed it has much to commend it – however a TMZ may prove more contentious with other airspace users over the peninsular and will need careful introduction.
Natural England	"No further comment from last feedback (see previous table above)" Dear Mr Pearson, Thank you for your email below requesting comment on the Draft Design Principles. Our previous advice dated 02 April 20 still stands and I have attached it again for information. Kind regards,
Regulation Director ARPAS UK	"Support" Dear Christopher, Thank you for the email and for consulting us. ARPAS UK supports your initiative in principle. We would however ask that you include in your thinking the future potential use of UAVs, when you complete the design process. Please do get in touch if you would like to discuss this aspect in any more detail. kind regards
Chief Operating Officer Cornwall Air Ambulance Trust	"Support" Hi Chris No issues from an air ambulance perspective. Best regards
Defence & Airspace and Air Traffic Management Ministry of Defence	"Support" Dear Chris, Hope you are well. Thank you for sight of the DPs with respect to Land's End ACP. I can confirm that MOD are content and have no further comments at this stage. We look forward to your continued engagement on this ACP. Many thanks,
Safety Representative	"Supportive with constructive ideas put forward"

Perranporth Flying Club Ltd	"Extracts below" You will see that an initial view is that a TMZ would be a workable solution. All aircraft at Perranporth are transponder equipped and a TMZ would meet the CAP1711 objective of assuring access. The Club would support ADSB or MLAT solutions with the offer a site for a ground station. Other proposals in *Airspace Design Principles for LETC: Final Report*, were for an RMZ or Class E airspace. Concerns are that an RMZ would degrade access and that a change from class G airspace would preclude VFR on many days due to the SERA 1000ft vertical clear of cloud rule and be counter to CAP1711.
Planning Advisor Environment Agency	"No remit to comment" Dear Chris, Thank you for your email. I remember the initial consultation some weeks ago, and consider that we would not have any comments in light of this draft proposal; We do not think that we, as a team, or the EA in general have a remit to comment on the ACP. Kind regards,

After careful consideration of the feedback received, we have decided upon the final design principles. One stakeholder put forward some ideas/alterations to the draft principles and

when considered alongside the existing draft proposals we came to the following conclusions.

	Draft Principle	Proposal
DP1	The airspace design and its operation must be as safe as or safer than today for all airspace users that are affected by the airspace change.	Proposed text "The airspace design and its operation shall be shown to be measurably safer than today for all airspace users that are affected by the airspace change."
Conclusion		
We concluded that the proposed change alluded to a change that was quantitative rather than qualitative and so we decided to keep the original principle.		
DP2	Subject to the overriding design principle of maintaining a high standard of safety, the highest priority principle of this airspace change is that it accords with the CAA's published Airspace Modernisation Strategy (CAP 1711) and any current or future plans associated with it.	Proposed text "This airspace change shall accord with the CAA's published Airspace Modernisation Strategy (CAP 1711) and any current or future plans associated with it."
Conclusion		
We concluded that the proposed change didn't highlight the overriding emphasis on safety being the highest priority and so we decided to keep the original text.		
DP3	Ensure that all airspace users retain the ability to have safe and efficient access to the airspace.	Consider inclusion of UAV/Drone usage
Conclusion		
After reviewing our own wording of this principle it was decided to add in the words "current & future" when regarding airspace users to take into account the potential future need of UAV/Drone users within the LETC.		
DP4	Ensure that all possible technical solutions – both existing and emerging - are considered (ie radar, ADSB). However, such options must be affordable relative to the Airport's income – both in terms of initial cost and	Proposed text "Ensure that all possible technical solutions – both existing and emerging – are considered (e.g. RADAR, ADSB, MLAT, TCAS). The lifecycle cost of options shall be

	ongoing running and maintenance costs.	affordable to the Airport's and commercial operator's income, the equipment costs for GA and other users."
Conclusion		
We concluded that the proposed change made some very important inclusions and would add to the overall effectiveness of the principle. The new proposed principle was adopted.		
DP5	Controlled airspace options should ensure there is safe and efficient access for other types of operations, and should explore measures, including classification and flexible use of airspace, where possible and appropriate, to improve access and decrease airspace segregation.	Viewpoint offered "A view is that controlled airspace options are counter to both affordability and access."
Conclusion		
We concluded that although the viewpoint may indeed be valid it was important that at this stage all options were open to be considered and so we decided to keep the original principle.		
DP6	Options should consider an RMZ and/or TMZ solution.	Viewpoint offered "An RMZ has the potential to reduce access if the hours of watch or controller capacity are limited. A TMZ could be a solution (possibly combined with MLAT). The demands upon the controlling authority to be evaluated. Only the minority of aircraft without transponders need to be managed."
Conclusion		
We concluded that although the viewpoint may indeed be valid it was important that at this stage all options were open to be considered and so we decided to keep the original principle.		
DP7	Ensure that any changes fully consider any environmental impact – to include noise, air pollution and social issues.	No change proposed
Conclusion		
Keep the principle as is.		
DP8	As feedback was received regarding the size of the	No detailed feedback at this stage

	airspace (some requesting a small volume and others a larger volume), both the height and breadth of the LETC will be fully considered.	
Conclusion		
Keep the principle as is.		

DP9		The airspace Design and Operation shall further enable greater access to airspace for non-commercial users in accordance with CAP 1711 and any change shall be shown to be proportionate to the hazard.
Conclusion		
We concluded that this proposal wasn't within the original remit of the ACP and was potentially at odds with DP2. We also concluded that access for all types of aircraft was adequately covered in DP1 & DP2 so we decided not to include this DP in the final list.		
DP10		The airspace change proposal shall address a Statement of Need (SoN) that includes numerical data for the existing and projected traffic within the LETC with a safety analysis in accordance with CAP1611 that identifies the class and routing of traffic that is a hazard.
Conclusion		
We concluded that since there was no one class of traffic that presented a hazard and that routing wasn't the particular issue either that this principle wouldn't enhance the ACP. All stakeholders have been given the opportunity to engage with the ACP and are doing so through this process. We decided not to include this DP in the final list.		
DP11		The airspace design shall consider operation by a single authority. (Chart gives Culdrose, Land's End, and St Mary's for radio contact)
Conclusion		

We concluded that this proposal had merit and should be included in the DP for further investigation. We decided to include this DP in the final list.

Final Design Principles

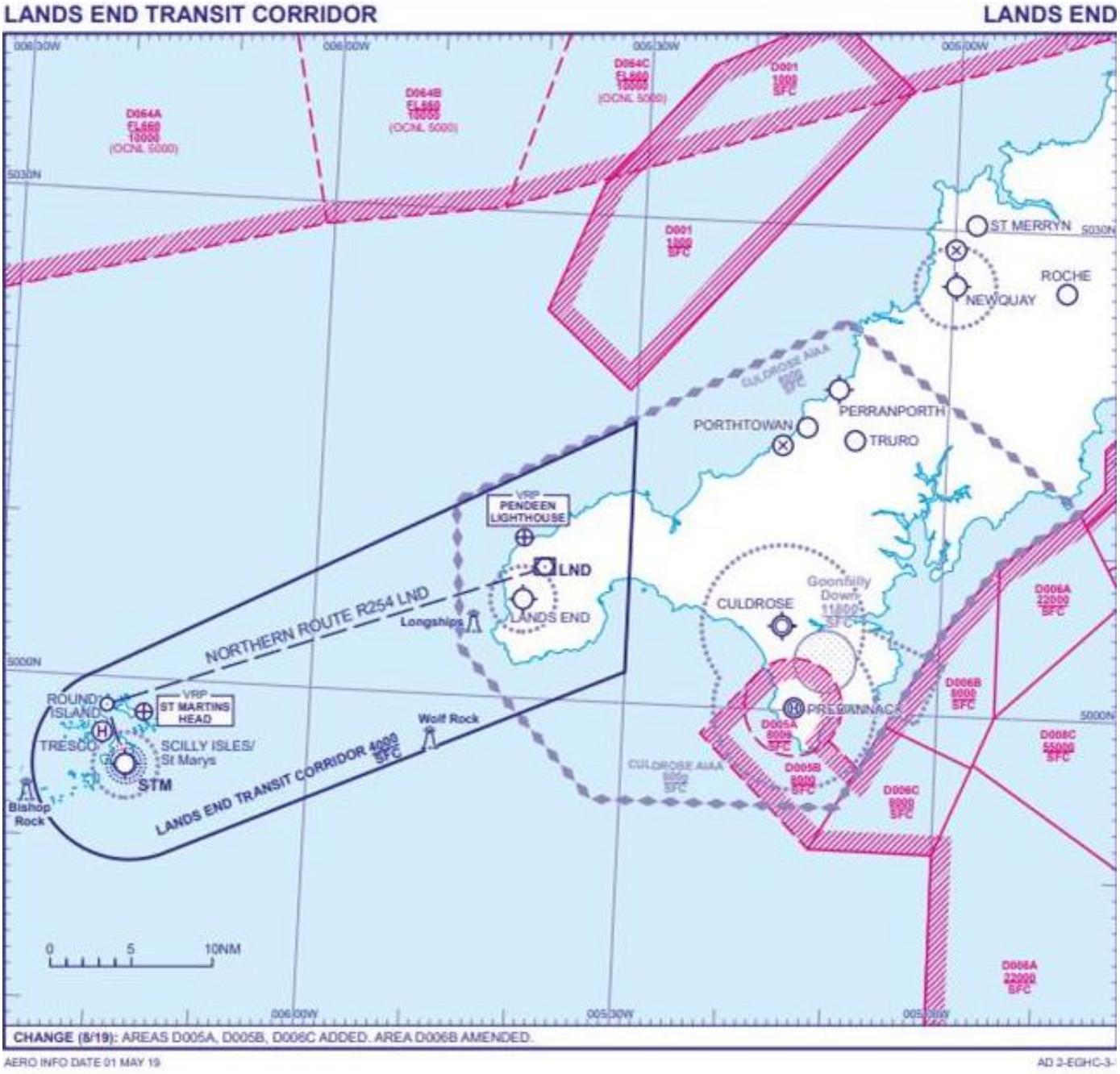
DP1	The airspace design and its operation must be as safe or safer than today for all airspace users that are affected by the airspace change.
DP2	Subject to the overriding design principle of maintaining a high standard of safety, the highest priority principle of this airspace change is that it accords with the CAA's published Airspace Modernisation Strategy (CAP 1711) and any current or future plans associated with it.
DP3	Ensure that all airspace users, current & future, retain the ability to have safe and efficient access to the airspace.
DP4	Ensure that all possible technical solutions – both existing and emerging – are considered (e.g. RADAR, ADSB, MLAT, TCAS). The lifecycle cost of options shall be affordable to the Airport's and commercial operator's income, the equipment costs for GA and other users.
DP5	Controlled airspace options should ensure there is safe and efficient access for other types of operations, and should explore measures, including classification and flexible use of airspace, where possible and appropriate, to improve access and decrease airspace segregation.
DP6	Options should consider an RMZ and/or TMZ solution.
DP7	Ensure that any changes fully consider any environmental impact – to include noise, air pollution and social issues.
DP8	Options shall not reduce and, where possible, enhance the air traffic movement capacity of Land's End Airport.
DP9	The airspace design shall consider operation by a single authority.

6. Conclusion & Next Steps

Our list of proposed design principles has been developed through two-way conversations with a mix of stakeholders that are potentially affected by the airspace change. We would like to thank all stakeholders that gave their time to support the engagement process, consider the issues and opportunities associated with the airspace change and share their views on the development of the design principles. We expect that our engagement during the options development and assessment stage, will be more constructive because of the outputs of the design principle engagement.

We are committed to continuing a transparent two-way process of engagement as the ACP progresses and will write to all stakeholders following the submission of the Stage 1 report to the CAA to ensure they remain updated.

APPENDIX 1


LANDS END TRANSIT CORRIDOR
LANDS END
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D064B
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D064C
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D001
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ST MERRYN
NEWQUAY
ROCHE
PERRANPORTH
PORTHTOWAN
TRURO
VRP
PENDEEN
LIGHTHOUSE
LND
LANDS END
Longships
NORTHERN ROUTE R254 LND
CULDROSE
Goonhilly
Down
11500
SFC
PREDANNACK
D006A
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SFC
D006B
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St Marys
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Bishop
Rock
Wolf Rock
LANDS END TRANSIT CORRIDOR 4000 SFC
0
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10NM
CHANGE (5/19): AREAS D005A, D005B, D006C ADDED. AREA D006B AMENDED.
AERO INFO DATE 01 MAY 19
AD 2-EGHC-3-

APPENDIX 2

Land's End Airport Ltd
St. Just, Penzance, Cornwall TR19 7RL
Tel: 01736 788771 Email: cpearson@issg.co.uk

26th March 2020

Dear Sir/Madam

Introduction

I am writing to you to inform you and your organisation of an Airspace Change Proposal (ACP) being put forward to the CAA. The change sponsor is Land's End Airport , however the proposal is being developed with the support of St Mary's Airport, Isles of Scilly Skybus and Penzance Heliport.

An ACP is needed because we want to make a permanent change to the airspace known as the Land's End Transit Corridor (LETC). The process ensures that all reasonable options are being considered and that the correct choices are made in order to make improvements to aviation safety. To ensure the views and needs of all stakeholders are included we are engaging with you at this stage to openly discuss the proposal and seek your constructive input.

To this end we are engaging with all those who may be affected by the proposed change in order to notify them in full. All stakeholders will be consulted during the process and, later, given the opportunity to make representation with their opinions.

The whole process is monitored and evaluated by the UK's independent regulator, the CAA. Any decision made by the CAA, will take into account the current legal requirements and will consider aviation safety, the environment and the needs of airspace users. The whole process is transparent and open to public scrutiny and once any document has been uploaded to the ACP Portal website, can be viewed by any interested party. Details of the change proposal can be found at this address

https://airspacechange.caa.co.uk/PublicProposalArea?pID=199

Current Situation

Situated in the far South-West, the Land's End Transit Corridor (LETC) is an established block of airspace (Surface to 4,000ft altitude) linking Land's End Airport to the Isles of Scilly. The Corridor is situated in Class G airspace and partially within the RNAS Culdrose AIAA.

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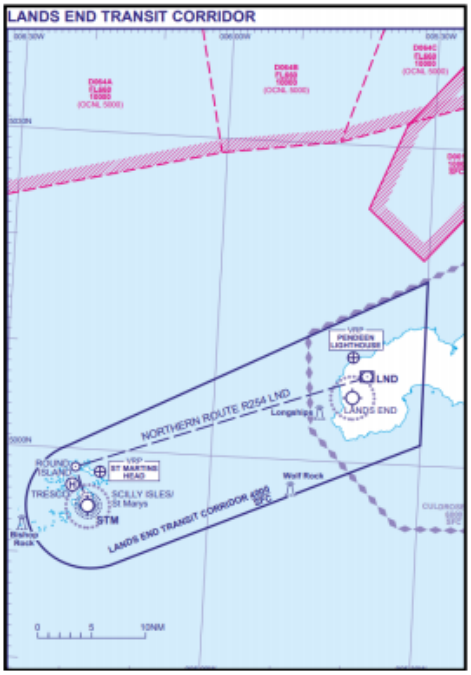

The LETC is used predominantly by scheduled passenger and freight carrying flights - both fixed-wing and rotary aircraft. In addition, it is used by military aircraft (both fixed-wing and rotary), SAR & Helimed helicopters, Trinity House helicopters, General Aviation flights and other charter and air-taxi operators.

Aircraft using the LETC become funnelled within a very narrow lateral and vertical area of airspace. In order to provide increased protection for all users, and in particular, the scheduled public transport flights - some of which may be conducting IFR RNAV approaches - a need for an airspace change was identified.

In summary, the purpose of this airspace change proposal is to consider possible solutions that could provide mitigation to the current unknown traffic environment within the LETC.

Improved Situation

The ideal and safest environment would be if all airspace users intending to fly within the LETC would be in full radio contact with ATC. Since the LETC falls within the western section of the Culdrose AIAA and not all aircraft will have been in radio contact with Culdrose it would be advantageous if all aircraft were visible to RADAR as well.

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Isles of Scilly Steamship GROUP

Developing Design Principles

We recognise that any change in the type of airspace within the Land's End Transit Corridor will have an impact on all stakeholders so at this stage in the change process we are seeking to establish a framework for the change. We want you all to have an opportunity to express your preferences and expectations so that a local context may be applied to any proposal. In your response to this invitation to comment we would ask that you share with us your concerns, ideas and requirements regarding the Land's End Transit Corridor. Examples of things you may wish to consider are the environmental impact of a change, needs of passengers and aircrew, efficiency and expedition of routes and of course overall safety of all users. All your responses will be evaluated during the process and will help towards the creation of a final set of design principles which will then help us to shortlist the options available for an airspace change.

Next Steps

We would ask that you take time to consider what an improved situation may look like in line with your requirements and the safety of all airspace users and then get in contact with us, in writing, **before the 8th April 2020** to give us your ideas. Every opinion counts during this process and will be included in the data that we provide to the CAA as part of the application process.

My contact details are as follows;

Mr Chris Pearson
Airport Manager
Land's End Airport
Kelynack
St Just
Penzance
TR19 7RL

cpearson@issg.co.uk

Yours faithfully

C M Pearson
Airport Manager / Senior ATCO

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Land's End Airport Ltd
St. Just, Penzance, Cornwall TR19 7RL
Tel: 01736 788771 Email: cpearson@issg.co.uk

29th May 2020

Dear Sir/Madam

Further to my letter dated 26th March 2020, regarding an Airspace Change Proposal (ACP) to the airspace known as the Land's End Transit Corridor (LETC), please find an update on progress below.

The ACP was initiated with the support of three key stakeholders - St Mary's Airport, Penzance Heliport and the Isles of Scilly Skybus. The initial consultation period ended on the 7th May 2020 (extended from the initial 8th April 2020 deadline due to the onset of the COVID-19 pandemic) and I have since received a number of very helpful comments and ideas.

You were one of 58 stakeholders or potential interested parties that we contacted. We have listened to all the feedback submitted and used these comments/ideas to develop some draft Design Principles (DP). These are outlined in the table below – numbered 1 to 8. Design principles are the bedrock upon which we build our options for an improved airspace within the LETC. I would emphasise that at this stage these are only in draft form and are being sent out to you for you to offer any further feedback on the proposal but in particular on these principles.

DP1	The airspace design and its operation must be as safe or safer than today for all airspace users that are affected by the airspace change.
DP2	Subject to the overriding design principle of maintaining a high standard of safety, the highest priority principle of this airspace change is that it accords with the CAA's published Airspace Modernisation Strategy (CAP 1711) and any current or future plans associated with it.
DP3	Ensure that all airspace users retain the ability to have safe and efficient access to the airspace.
DP4	Ensure that all possible technical solutions – both existing and emerging - are considered (ie radar, ADSB). However, such options must be affordable relative to the Airport's income –

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	both in terms of initial cost and ongoing running and maintenance costs.
DP5	Controlled airspace options should ensure there is safe and efficient access for other types of operations, and should explore measures, including classification and flexible use of airspace, where possible and appropriate, to improve access and decrease airspace segregation.
DP6	Options should consider an RMZ and/or TMZ solution.
DP7	Ensure that any changes fully consider any environmental impact – to include noise, air pollution and social issues.
DP8	As feedback was received regarding the size of the airspace (some requesting a small volume and others a larger volume), both the height and breadth of the LETC will be fully considered.

All comments and ideas are welcome – all feedback is included and shared with the CAA. Thank you in advance for your time spent helping with this ACP.

The deadline for submitting feedback for this round of consultation is Wednesday 10th June 2020.

Should you need them, my contact details are as follows;

Mr Chris Pearson
Airport Manager
Land's End Airport
Kelynack
St Just
Penzance
TR19 7RL

cpearson@issg.co.uk
Office: 01736 785227

Yours faithfully

C M Pearson
Airport Manager / Senior ATCO

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APPENDIX 3