

Received
30th March 2020
Christopher M Pearson
Airport Manager
Kelynack, St. Just, Penzance,
Cornwall, TR19 7RL



British Microlight Aircraft Association **Policy for Design Principles during ACP engagement**

Introduction

The following text describes the underlying principles that the British Microlight Aircraft Association (BMAA) believes must be followed by applicants for airspace change proposals.

Consultation

1. The BMAA welcomes the opportunity to engage in consultation at an early stage within the ACP CAP 1616 process.
2. Sponsors are encouraged to engage with the BMAA and its members as early as possible during the development of the ACP. Previous ACPs have missed the opportunity for early engagement and dialogue resulting in significant and costly delays.

Airspace classification

1. The BMAA considers that the UK airspace's default classification is G and that sponsors must establish a safety case for proposing to change this class or add any further restrictions or requirements by their ACP.
2. All sponsors must demonstrate that alternatives have been considered such as RMZ and TMZ before considering controlled airspace.
3. Where Class E is proposed, without a TMZ or RMZ should be considered as the default option.

Access by GA

1. 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.
2. 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...



Airspace volume

1. In line with the principles of the Airspace Modernisation (was FAS) principles the ACP must respect the requirement for minimum airspace volumes designed for efficiency and reduced environmental impact. These principles will include:
 - Minimum size of controlled airspace
 - Minimum number of departure/arrival routes
 - Steeper and continuous climbs and descents for cost and environmental benefits as well as minimisation of CAS footprint.

Justification

1. Sponsors must conduct and present proper analysis of overall airspace safety changes i.e. based on modelling and evidence rather than purely subjective opinion.
2. Sponsors must provide proper validation of forecast traffic levels. There is an expectation that data used, particularly forecasts, will be verifiable including details of any and all assumptions.

Airspace integration

1. Sponsors must show how they are integrating their proposal within the overall UK airspace modernisation context, for example proposals which do not connect efficiently between upper and lower airspace (potentially under different airspace "management") would only inhibit overall airspace efficiency and therefore not receive our support)
2. Optimisation of the development work above and below the 7,000ft NATS en-route split.

**Sloane Helicopters Ltd
Penzance Heliport
Penzance
TR18 3FL**

SLOANE

31 Mar 2020

Airspace Change Proposal (ACP) for Land's End Transit Corridor (LETC) – Sloane Helicopters Response

References:

- A. <https://airspacechange.caa.co.uk/PublicProposalArea?pid=199>
- B. B. Isles of Scilly Steamship Group (Land's End Airport Ltd) letter dated 26 Mar 2020

Annex:

- A. Letter of Agreement – Land's End Transit Corridor 12 March 2020

Introduction

1. The ACP for the LETC is sponsored by Land's End Airport but recognises that the proposal will be developed with the support of St Mary's Airport, IOS Skybus and Penzance Heliport. For the purposes of this consultation Sloane Helicopters Ltd will act for Penzance Heliport as both the operator of the heliport and the helicopter scheduled service to Scilly. It is noted that Tresco Estate should also be included in these discussions as the operator of a Licenced Aerodrome (Tresco Heliport) within the LETC.

2. The ACP notes that a variety of users operate inside the LETC which is currently Class G airspace and as set out in Reference A, the aim of the ACP is: *'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 ACP is to consider possible airspace solutions that could provide mitigation to the current unknown traffic environment within the 'LETC.'*

3. Reference B notes: *'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.'* This document aims to identify the key operational issues relating to the helicopter scheduled service and propose suggestions to enhance safety within the LETC whilst maintaining operational flexibility and efficiency.

Current LETC and possible changes

4. The current LETC environment in Class G airspace follows procedures evolved over several decades of GA and Scheduled Service (fixed and rotary-wing) operations. St Mary's, Land's End, Tresco Heliport and Penzance Heliport (former and current EGHK) all lie within the LETC. Commercial flights from Newquay, Exeter and further afield all require to route through the LETC to access St Mary's or Tresco Heliport. Any pilot requiring to cross or operate within the LETC (this includes military jets, helicopters and Fishery Patrol aircraft, etc.) is 'strongly recommended to contact St Mary's or Land's End ATC' ...but this is currently not mandatory. It should also be noted that part of the LETC lies within RNAS Culdrose's AIAA which extends from the surface to 6000ft.

5. A set of coordination procedures are in place for the LETC, signed by St Mary's, Land's End, Culdrose and Penzance Heliport (Sloane) – see Annex A below. The management of traffic within the LETC is jointly coordinated by Land's End and St Mary's ATC and helicopter scheduled flights from Penzance are managed alongside any other fixed-wing activity at the stated standard transit altitudes. In the event of poor weather and particularly low cloud conditions at Land's End, helicopters may still operate at 500ft amsl between Penzance and Scilly, routing around the Land's End peninsula. In many such conditions helicopters may be able to continue low-level under VFR when fixed-wing aircraft require IFR transits and approach procedures.

6. To sum up the current situation of the LETC:

<p>Strengths</p> <ul style="list-style-type: none"> -Flexible entry by all operators and crossing traffic. -Minimum disruption to scheduled flight times. -Penzance Helicopters often able to de-conflict by operating COCISS at 500ft amsl. 	<p>Weaknesses</p> <ul style="list-style-type: none"> -Little protection to LETC traffic to/from Scilly from non-scheduled and crossing traffic. -No Primary/Secondary or ADS-B monitoring. -Only 'manual' ATC co-ordination with Culdrose.
<p>Opportunities (via proposed ACP for LETC)</p> <ul style="list-style-type: none"> -Provision of co-ordination of RNAV and PinS approaches at EGHC and EGHK. -Enhanced safety within the LETC particularly in poor weather conditions. 	<p>Threats</p> <ul style="list-style-type: none"> -Risk to LETC scheduled traffic from non-cooperating crossing traffic. -Disruption to scheduled service timetables due to sequencing of IFR/GNSS aircraft.

Proposals to enhance LETC

7. In order to better utilise the capacity within the LETC a number of enhancements are proposed:

- 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.

8. It is essential that any changes to the current LETC arrangements take into account the legal and commercial responsibilities of the current operators (Skybus and Penzance Helicopters) together with others using the airspace such as Trinity House (PDG Helicopters), Cornwall Air Ambulance (SAS), RN and RAF, HMCG SAR helicopters and General Aviation users. Tresco Heliport (EGHT) must also be integrated into these consultations as it is a Licenced Aerodrome (Heliport) lying within the LETC. It is considered that a joint approach leading to a single, free-standing ANSP controlled by the key stake-holders is likely to provide the most cost-effective and equitable solution, whilst drawing together the requirements of LETC users for maximum efficiency.

Summary

9. Sloane Helicopters Ltd, operators of Penzance Heliport and the associated helicopter scheduled service to St Mary's and Tresco, strongly support the proposal to enhance safety within the LETC for all users of the airspace. In order to make the enhancements cost-effective and flexible to the requirements of fixed-wing and helicopter scheduled operations, it is proposed that the ACP process should be conducted in particularly close consultation with Sloane and Skybus as the key commercial stake-holders. It is submitted that the outline proposals at paragraph 7 above should be fully considered in shaping any changes to the current LETC arrangements.



Sloane Helicopters, Penzance Heliport

Annex A

Letter of Agreement – Land's End Transit Corridor 12 March 2020

LETC Letter of Agreement

LETTER OF AGREEMENT LANDS END TRANSIT CORRIDOR

Introduction

The purpose of this letter is to provide locally agreed and CAA approved procedures within the Land's End Transit Corridor (LETC), in order to achieve an expeditious flow of Traffic consistent with safety.

Document References:

1. UK AIP AD2 EGHC (Text and IAP Charts) / EGHE 1.2.22 (Text) and 3.1 (Chart), 8.1 (Chart)
2. CAP 774 (UK Flight Information Service)
3. CAP 493 (Manual of Air Traffic Services Part 1)

The following is a record of the agreement between the representatives of the Air Traffic Service providers at St. Mary's Airport, Land's End Airport, RNAS Cudrose, Penzance Heliport, the aircraft operator Penzance Helicopters and the aircraft operator Isles of Scilly Skybus.

PDG Helicopters (Trinity House Operations at Land's End), Specialist Aviation Services (Cornwall Air Ambulance at Newquay Airport), Bristow Helicopters (HM Coast Guard Rescue at Newquay Airport) as regular users of the LETC, are included in the distribution list of this document for information purposes only as their specific type of operations may preclude them from complying fully with the procedures.

Background Information

1. **Types of Air Traffic Services (ATS) available within and adjacent to the LETC:**
 - a) **EGHE/ISC – BASIC Service routinely provided – PROCEDURAL Service routinely provided to aircraft carrying out Instrument Approach Procedures unless another service has been requested.**
 - b) **EGHC/LEQ – BASIC Service routinely provided;**
 - c) **EGDR – BASIC / TRAFFIC / DECONFLICTION Services routinely provided;**
 - d) **EGHQ/NQY – BASIC / PROCEDURAL / TRAFFIC / DECONFLICTION Services routinely provided.**
 - e) **EGHK/PZE – AGCS**
 - f) **EGHT/TSO – AGCS**
2. **Agreement should be reached between the Pilot and Controller regarding the type of Service being provided.**
3. **Pilots should be aware of the types of ATS available and the responsibilities of the Pilot and Controller for each type of service:**
 - a) **Provision of separation is dependent upon the type of service, not the Flight Rules.**
 - b) **In Class G airspace, the pilot is ultimately responsible for terrain clearance.**

Continues . . .

Date: 02 April 2020
Our ref: [REDACTED]
Your ref: [REDACTED]



Customer Services
Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

cpearson@islesofscilly-travel.co.uk
Mr Chris Pearson
Airport Manager
Land's End Airport
Kelynack
St Just
Penzance
TR19 7RL
BY EMAIL ONLY

Dear Chris

Airspace Change Proposal - Land's End Transit Corridor (LETC) Airspace
Location: airspace known as the Land's End Transit Corridor (LETC)

Thank you for seeking our advice on the Land's End transit corridor change proposal in your consultation dated and received on 28 March 2020.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Sites of Special Scientific Interest (SSSIs) and sites of European or International Importance (Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and Ramsar sites)

The airspace covers a large area and is within the following designated nature conservation sites: Marazion Marsh SPA, the Isles of Scilly Complex SAC, Isles of Scilly SPA, Isles of Scilly Ramsar, Lands End and Cape Bank SAC and associated SSSIs.

Any changes proposed should fully consider the potential impacts on these designated site, particularly the impact on birds and seals from disturbance by helicopters and planes. The Eastern Isles is a particularly sensitive area for bird disturbance during the breeding season.

- Further information on the SSSIs and their special interest features can be found at www.magic.gov.
- - European site conservation objectives are available on our internet site <http://publications.naturalengland.org.uk/category/6490068894089216>

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us. For any queries relating to the specific advice in this letter only please contact Mark Wills on mark.wills@naturalengland.org.uk. For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

Yours sincerely


Cornwall Team

Christopher Pearson

From: SPDC <SPDC@environment-agency.gov.uk>
Sent: 03 April 2020 11:52
To: Christopher Pearson
Subject: RE: 200331/AC05 FW: Land's End Airport - Airspace Change Proposal - Land's End Transit Corridor (LETC) Airspace

Dear Christopher,

As indicated by [REDACTED] we have received this consultation. My team manages planning applications within Devon, Cornwall and the Isles of Scilly. We have looked at the document but we do not think that we, as a team, or the EA in general have a remit to comment on the ACP.

Please come back to us if you wish to discuss it further.

Kind regards,

[REDACTED]
[REDACTED]
Planning Advisor | Sustainable Places
Devon, Cornwall and the Isles of Scilly | Environment Agency

Tel: [REDACTED]
Email: SPDC@environment-agency.gov.uk
Manley House, Kestrel Way, Sowton Ind Est, EX2 7LQ

Does Your Proposal Have Environmental Issues or Opportunities? Yes? Don't know? Speak To Us Early!
If you are planning a new project or development, we want to work with you to make the process as smooth as possible. Early engagement can improve subsequent planning applications to you and your clients' benefit and deliver environmental outcomes. We will provide you with a project manager who will coordinate all meetings and reviews in order to give you detailed specialist advice with guaranteed delivery dates. More information on what we can do, along with our charges, can be found on our website [here](#).

From: Enquiries, Unit
Sent: 31 March 2020 11:51
To: cpearson@islesofscilly-travel.co.uk
Subject: 200331/AC05 FW: Land's End Airport - Airspace Change Proposal - Land's End Transit Corridor (LETC) Airspace

Dear Christopher,

I have passed your enquiry to our Sustainable Places team for the relevant area.

Should you wish to contact the Sustainable Places team directly, please use the contact details below. Please quote your Enquiry Reference 200331/AC05 in any correspondence with us regarding this matter.

Sustainable Places
Environment Agency
Devon, Cornwall and the Isles of Scilly
Sir John Moore House

Victoria Square
BODMIN
PL31 1EB

Kind regards,


Customer Contact Centre
Environment Agency

(Tel: )

: Web Site: www.gov.uk/environment-agency

Click an icon to keep in touch with us:-



From: Christopher Pearson [<mailto:cpearson@islesofscilly-travel.co.uk>]

Sent: 28 March 2020 00:25

Subject: Land's End Airport - Airspace Change Proposal - Land's End Transit Corridor (LETC) Airspace

Dear All,

Please find attached a letter detailing an Airspace Change Proposal (ACP) being put forward to the Civil Aviation Authority (CAA) for the block of airspace known as the Land's End Transit Corridor (LETC).

The change sponsor is Land's End Airport, however the proposal is being developed by all regular users of the airspace including St. Mary's Airport, Penzance Heliport and the Isles of Scilly Skybus.

This ACP is following the guidance contained within the CAA publication CAP 1616 and you have received this notification as a nominated stakeholder for this proposal.

We are seeking your views, ideas and requirements regarding the LETC to help us develop some design principles to improve the current air traffic environment.

If you require any further information – please do not hesitate to contact me.

I look forward to any comments, or if applicable, a statement of no impact.

Kind Regards,

Chris.

Christopher Pearson
Airport Manager/SATCO
Land's End Airport

T: +44 (0)1736 785227

M: +44 (0)7747 468821

cpearson@islesofscilly-travel.co.uk

www.islesofscilly-travel.co.uk

Land's End Airport, Kelynack, St Just, Penzance, Cornwall, TR19 7RL

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Christopher Pearson

From: [REDACTED] <[REDACTED]@mod.gov.uk>
Sent: 09 April 2020 13:58
To: Christopher Pearson
Cc: Neil Didlick
Subject: RE: Land's End Airport - Airspace Change Proposal - Land's End Transit Corridor (LETC) Airspace

Thanks Chris.

Speak soon,

Regards

[REDACTED]
[REDACTED] SO2 Airspace Plans | Defence Airspace and Air Traffic Management | CAA Aviation House | Gatwick, RH6 0YR | [REDACTED] | MOD Net: DAATM-AirspacePlansSO2 | E-Mail: [REDACTED]

From: Christopher Pearson <cpearson@islesofscilly-travel.co.uk>
Sent: 09 April 2020 13:44
To: [REDACTED]
Cc: Neil Didlick <ndidlick@islesofscilly-travel.co.uk>
Subject: RE: Land's End Airport - Airspace Change Proposal - Land's End Transit Corridor (LETC) Airspace

Thank you for your email.

My apologies if I misunderstood your previous email – we are new to the CAP1616 ACP process and are trying to abide by the strict guidelines that the CAA have firmly impressed upon us!

The Design Principles are that we wish to make the Land's End Transit Corridor (the airspace subject to this ACP) a safer place in which to fly while keeping the airspace as accessible as possible with minimal impact on other users and external factors. This narrow band of airspace has become busier over the last few years and is now used by multiple commercial operators carrying out CAT passenger and freight movements. In addition several new RNAV IAP's are now active, or shortly to become active, with a resultant increase in IFR traffic within this relatively compressed airspace.

One way to achieve these Design Principles would be to try and create a known traffic environment within the Land's End Transit Corridor. There may be many ways to achieve this aim but we would look to implement the most flexible and least impact solutions bearing in mind realistic restrictions such as initial and ongoing costs, practicalities, etc.

We work very closely with our closest military base, RNAS Culdrose, and have a very good working relationship with them. We have existing Letters of Agreement between the two ATC Units – both for the Land's End Corridor and also for military traffic/UAV's – that work very well and I am sure we can find a solution for this ACP that works well for all.

I look forward to further responses when possible and wish you all the Best over the Easter weekend,

Kind Regards,

Chris.

From: [REDACTED]
Sent: 09 April 2020 10:19
To: Christopher Pearson <cpearson@islesofscilly-travel.co.uk>
Cc: Neil Didlick <ndidlick@islesofscilly-travel.co.uk>
Subject: RE: Land's End Airport - Airspace Change Proposal - Land's End Transit Corridor (LETC) Airspace

Good morning Chris,

Thanks for your email. Just to clarify that my request below was with respect to sight of the draft Design Principles as part of stage 1b, not any proposed airspace design or solution. Whilst there are numerous different ways of satisfying the criteria in Stage 1b of CAP1616, often in my experience, ACP sponsors share their proposed draft design principles with stakeholders at some stage during Stage 1. This helps to generate valuable discussion such that the stakeholders fully understand the sponsor's rationale and aims, but also such that stakeholders can input, add suggestions, amendments etc. Notwithstanding this, as per my email below, with respect to design principles, MOD believe the following should be considered for inclusion:

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

I have asked for further specific comment from MOD stakeholders however I'm uncertain when I will receive response – I will send to you as soon as I can. I do, however, acknowledge your CAA deadline and do not expect you to delay submission on account of us.

Hope you have a Happy Easter weekend,

Kind Regards

[REDACTED]

[REDACTED] SO2 Airspace Plans, Defence Airspace and Air Traffic Management | CAA
Aviation House | Gatwick, RH6 0YR | [REDACTED] | MOD Net: DAATM-
AirspacePlansSO2 | E-Mail: [REDACTED]

From: Christopher Pearson <cpearson@islesofscilly-travel.co.uk>
Sent: 08 April 2020 15:45
To: [REDACTED]
Cc: Neil Didlick <ndidlick@islesofscilly-travel.co.uk>
Subject: RE: Land's End Airport - Airspace Change Proposal - Land's End Transit Corridor (LETC) Airspace

Dear [REDACTED]

Thank you for your email.

It is my understanding of the process, in tandem with guidance received from the CAA, that at this stage, we should not suggest any possible solutions as it can be deemed that the sponsor has already narrowed the options available. I believe there is a later stage of consultation where options are presented - developed from this stage.

I understand that this is more of an alert to the fact we have started an ACP and to gain ideas from stakeholders to help us develop design principles.

Therefore, we invite you to suggest any solution to the statement of need - namely that we are seeking ways to create a more known environment in some increasingly busy airspace where scheduled passenger transport takes place.

Please take more time to formulate a response – we ideally need to collate all feedback and send to the CAA by the end of the week – however, with regard to the current COVID-19 pandemic, we are hoping this timescale may be relaxed. Is it possible for you to estimate your expected response date?

I hope that this assists - but please contact me again if I can help further,

Kind Regards,

Chris.

From: [REDACTED]
Sent: 07 April 2020 17:07
To: Christopher Pearson <cpearson@islesofscilly-travel.co.uk>
Subject: FW: Land's End Airport - Airspace Change Proposal - Land's End Transit Corridor (LETC) Airspace

Dear Chris,

Thank you for the email and information regarding the Land's End LETC ACP. I have forwarded this information onto colleagues within defence who will be able to provide specific input from their perspectives however I wondered if you had any proposed draft design principles at this stage which could be shared? From an MOD perspective, safety is paramount, whilst ensuring access to airspace and minimising impact to military training and operations is also of key importance.

Noting the deadline for responses is tomorrow (8 Apr), MOD will be unable to return a consolidated response by then, is it possible for additional time to allow for more detailed/specific input?

MOD are very keen to engage with Land's End airport throughout this ACP.

Kind Regards

[REDACTED]
[REDACTED] | SO2 Airspace Plans | Defence Airspace and Air Traffic Management | CAA Aviation
House | Gatwick, RH6 0YR | Civilian Telephone: [REDACTED] | MOD Net: DAATM-AirspacePlansSO2 | E-Mail:
[REDACTED]

From: Christopher Pearson <cpearson@islesofscilly-travel.co.uk>
Sent: 28 March 2020 00:28
Subject: FW: Land's End Airport - Airspace Change Proposal - Land's End Transit Corridor (LETC) Airspace

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From: Christopher Pearson <cpearson@islesofscilly-travel.co.uk>

Sent: 28 March 2020 00:25

Subject: Land's End Airport - Airspace Change Proposal - Land's End Transit Corridor (LETC) Airspace

Dear All,

Please find attached a letter detailing an Airspace Change Proposal (ACP) being put forward to the Civil Aviation Authority (CAA) for the block of airspace known as the Land's End Transit Corridor (LETC).

The change sponsor is Land's End Airport, however the proposal is being developed by all regular users of the airspace including St. Mary's Airport, Penzance Heliport and the Isles of Scilly Skybus.

This ACP is following the guidance contained within the CAA publication CAP 1616 and you have received this notification as a nominated stakeholder for this proposal.

We are seeking your views, ideas and requirements regarding the LETC to help us develop some design principles to improve the current air traffic environment.

If you require any further information – please do not hesitate to contact me.

I look forward to any comments, or if applicable, a statement of no impact.

Kind Regards,

Chris.

Christopher Pearson
Airport Manager/SATCO
Land's End Airport

T: +44 (0)1736 785227

M: +44 (0)7747 468821

cpearson@islesofscilly-travel.co.uk

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Land's End Airport, Kelynack, St Just, Penzance, Cornwall, TR19 7RL

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COUNCIL OF THE ISLES OF SCILLY

Air Traffic Services, St. Mary's Airport, St Mary's, Isles of Scilly, TR21 0NG

FAO: Christopher Pearson - SATCO & Airport Manager

**Isles of Scilly Steamship Group
Land's End Airport,
St. Just,
Penzance,
Cornwall,
TR19 7RL**

04. May 2020

Dear Chris,

Ref: ACP-2019-75

I refer to your letter dated 28. March 2020 regarding the above Airspace Change proposal to the Lands End Transit Corridor.

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.

Your Sincerely,

Manager Air Traffic Services & Airport

For and on behalf of the Council of the Isles of Scilly



**Isles of Scilly Skybus Ltd
Lands End Airport
St Just
Penzance
Cornwall
TR19 7RL**

**Mr C. M. Pearson
Airport Manager / Senior ATCO
Land's End Airport
St Just
Penzance
Cornwall
TR19 7RL**

5th May 2020

Dear Chris,

I am writing to offer the support of Isles of Scilly Skybus Ltd for the Airspace Change Proposal regarding the area known as the Land's End Transit Corridor (LETC).

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.

[Redacted signature]

[Redacted signature]

**Quality & Flight Safety Manager
Isles of Scilly Skybus**



Christopher Pearson -SATCO & Airport Manager
Land's End Airport,
St. Just, Penzance,
Cornwall,
TR19 7RL
05 May 2020

Dear Chris,

Ref: ACP-2019-75

Regarding the letter dated 26th March 2020 detailing the Airspace Change proposal to the Land's End Transit Corridor.

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.

Your Sincerely,

A large black rectangular redaction box covering the signature of the Chief Pilot.

A smaller black rectangular redaction box covering the name of the Chief Pilot.

Chief Pilot / Head of Training
Skybus.

Christopher Pearson

From: Christopher Pearson
Sent: 05 May 2020 16:31
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: LETC Change Proposal

Dear [REDACTED]

Thank you for your email below – I trust all is well with yourself and the team at Perranporth.

You are correct that we are at the very early stages of the APC and that the current situation is that there is currently an unknown traffic environment within the LETC (Class G). At this early stage we have to be very careful not to suggest solutions, which may be perceived as potentially pre-determined outcomes, but your suggestion that users be in radio contact / visible to radar is certainly an option.

At this early stage, in accordance with CAA policy, we are seeking design principles only. Such design principles include our wish to make the Land's End Transit Corridor a safer place in which to fly while keeping the airspace as accessible as possible with minimal impact on other users and external factors. This narrow band of airspace has become busier over the last few years and is now used by various commercial operators carrying out CAT passenger and freight movements (eg the new Penzance Helicopter service). In addition several new RNAV IAP's are now active with a resultant increase in IFR traffic within this relatively compressed airspace.

Unfortunately, until we move on further with the ACP, we cannot present you with a 'final idea/solution' as this will be guided by the responses we receive. I will certainly include your comments below in this process. We will consult again once we progress to the next stages of the APC.

I hope this is of some help but please contact/call me (07747 468821) if you have any further queries,

Kind Regards,

Chris.

From: Perranporth Flying Club [REDACTED]
Sent: 05 May 2020 16:09
To: Christopher Pearson <cpearson@Islesofscilly-travel.co.uk>
Cc: [REDACTED]
Subject: LETC Change Proposal

Dear Chris,

[REDACTED] Newquay kindly circulated a copy of the Letter to Stakeholders to the Safety Committee members.

I trust it is not too late to make a contribution.

My understanding from the letter to stake holders and the statement of need is that the process is at an early stage.

The problem statement in the letter to stakeholders is that there is an unknown traffic environment within the LETC.

The improved situation was for all airspace users to be in radio contact with ATC and visible to RADAR.

Is there proposal for the implementation upon which we might comment?

Perranporth Flying Club has a number of members whose aircraft are resident on the Scillies. In addition, we have members who have business on the Scillies and use their aircraft to travel to and fro. We also have members who like to take trips to the Scillies.

As regards flying training, we carry out most of our general handling over St. Ives Bay, or occasionally Mounts Bay, getting a service from Culdrose during the week or Newquay at weekends. We are always pleased to be coordinated with traffic entering and leaving the 'corridor' often limiting a part of the exercise as traffic passes. This is good training for students as it gets them used to other aircraft. We use the Lands End VOR for instrument training, again getting a Traffic service from Culdrose or Newquay, with a Basic Service on box 2 with Lands End. Lastly, we conduct Trial Lessons clockwise around the West Penwith peninsula, getting a Basic service from Lands End.

Those of our members who choose to conduct a flight around the peninsula themselves would also call Lands End for a service.

When we have visitors stop with us for fuel, who are planning a trip to the Scillies, we give them a brief based on how we conduct ourselves.

With all the above in mind, I am at a loss to understand what unknown traffic environment has suddenly appeared. I know that there are now Instrument approaches available for Lands End, but when these are going to be conducted in real IMC, there won't be people flying VFR, anyway.

Can you please let us know what changes to the airspace you are proposing?

Kind regards,



Head of Training

Perranporth Fling Club Ltd



**Isles of Scilly Skybus Ltd,
Land's End Airport,
Kelynack,
St Just, Cornwall,
TR19 7RL**

**Mr C. M. Pearson
Airport Manager / Senior ATCO
Land's End Airport
St Just
Penzance
Cornwall
TR19 7RL**

5th of May 2020

Dear Chris,

This letter is to confirm the support Skybus has for the proposed changes to the Land's End Transit Corridor (LETC).

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.

Yours sincerely,

A large, solid black rectangular redaction box covers the signature area, obscuring the name and any handwritten notes.

Operations Manager, Skybus.

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

Date: 06-05-2020

Dear Mr Pearson

Cornwall CPRE would like to make representations for the design process of changes to the Land's End Air Transit Corridor (LETC).

Our submission is based on the environmental considerations. We would emphasise that the new post-Covid thinking should at last, put the environment above cost and personal convenience.

We see three unjustifiable environmental threats from aircraft, much of which can be mitigated by better routing. On every count, by far the worst is passenger carrying helicopters.

- 1. Atmospheric pollution.** Aviation is the second most important source of transport Greenhouse Gases (GHG) emissions after road traffic. The main pollutants emitted by aircraft engines are carbon dioxide, nitrogen oxides, sulphur oxides, unburnt hydrocarbons, carbon monoxide and particulate matter. Cranfield University in a recent paper has recently categorised helicopters as a main source of local air pollution near airports.
- 2. Noise pollution.** The land based population is exposed to noise-induced annoyance. Helicopters produce a pulsating and higher Db on both ascent and descent much of which is needlessly over land. Their low altitude and slow speed make this even worse, stopping conversations and scaring wildlife.
- 3. Privacy violation.** Slow moving and low altitude aircraft represent an unacceptable intrusion into the privacy of our homes and gardens. On the 1st July this year, new legislation is being introduced for drones in this respect, why not for all aircraft?

Continued...

CPRE Cornwall is an independent charity, supported by membership and local donations. Our mission is to protect and safeguard the countryside, landscape and rural way of life in Cornwall. We work in close liaison with CPRE National (Campaign to Protect Rural England), who provide certain support services and campaign on national issues.

Whilst the extent of any medium or long term cutback in flying activity is still not clear, what is apparent is the need to control and mitigate now, the extent to which aviation is damaging the environment and consequently our physical and mental health. What should also not be ignored is the disrupting affect this noise and pollution is having on our birds and wildlife which are a fragile and vulnerable part of Cornwall's heritage. For this reason we are seeking to reduce the environmental and social harm arising from aviation by better operational practice.

As a protection to those living in West Cornwall therefore, we are proposing that the air corridor should be widened substantially, to enable every possible amount of flight time to be routed over the sea.

Yours sincerely

[REDACTED] – Chair
Cornwall CPRE
[REDACTED]

Christopher Pearson

From: [REDACTED]
Sent: 07 May 2020 15:56
To: Christopher Pearson
Subject: Land's End Airport - Airspace Change Proposal - Land's End Transit Corridor (LETC) Airspace

Follow Up Flag: Flag for follow up
Flag Status: Flagged

Good afternoon Mr Pearson,

I have canvassed the opinion of my GLA/Trinity House pilots, as they are they only PDG pilots who currently operate within the LETC. The consensus was that if the Penzance Helicopter operator is seeking approval to operate IFR using PIS approaches, then the whole corridor should be class D with a radar service available to guarantee separation.

I feel that this is unlikely on cost grounds but if using PBN in a VFR context, an alternative would be having an out and back route structure and formalising vertical separation.

Good luck with your proposal,

Best regards,

[REDACTED]

[REDACTED]

Chief Pilot



T: 0345 2416 345

W: www.pdgaviationservices.com

PLM Dollar Group Limited t/a PDG Aviation Services

The Heliport, Dalcross, Inverness, IV2 7XB

How to avoid catching or spreading coronavirus

Do

- wash your hands with soap and water often – do this for at least 20 seconds
- always wash your hands when you get home or into work
- use hand sanitiser gel if soap and water are not available
- cover your mouth and nose with a tissue or your sleeve (not your hands) when you cough or sneeze
- put used tissues in the bin straight away and wash your hands afterwards
- try to avoid close contact with people who are unwell
- Maintain a distance of 2m between you and other people

Don't

- **do not touch your eyes, nose or mouth if your hands are not clean**

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PLM Dollar Group Limited trading as PDG Aviation Services is registered in Scotland No. 157532 with its address: The Heliport, Dalcross, Inverness, IV2 7XB

Please visit our website at www.pdgaviationservices.com

Christopher Pearson

From: daa <daa@airpilots.org>
Sent: 29 March 2020 23:10
To: Christopher Pearson
Subject: Re: Land's End Airport - Airspace Change Proposal - Land's End Transit Corridor (LETC) Airspace

Thanks Chris. We will formulate a response accordingly.

[REDACTED]
[REDACTED]
Director of Aviation Affairs
The Honourable Company of Air Pilots
Air Pilots House
52A Borough High Street,
London, SE1 1XN
www.airpilots.org +44(0) 2074 044 032

From: Christopher Pearson <cpearson@islesofscilly-travel.co.uk>
Sent: Sunday, March 29, 2020 4:57:29 PM
To: daa <daa@airpilots.org>
Subject: Re: Land's End Airport - Airspace Change Proposal - Land's End Transit Corridor (LETC) Airspace

[REDACTED]
Thank you for your email.

It is my understanding of the process, in tandem with guidance received from the CAA, that at this stage, we should not suggest any possible solutions as it can be deemed that the sponsor has already narrowed the options available. I believe there is a later stage of consultation where options are presented - developed from this stage.

I understand that this is more of an alert to the fact we have started an ACP and to gain ideas from stakeholders to help us develop design principles.

Therefore, we invite you to suggest any solution to the statement of need - namely that we are seeking ways to create a more known environment in some increasingly busy airspace where scheduled passenger transport takes place.

I hope that this assists - but please contact me again if I can help further,

Kind Regards,

Chris.

Get [Outlook for Android](#)

From: daa <daa@airpilots.org>
Sent: Sunday, 29 March 2020, 16:08
To: Christopher Pearson
Subject: Re: Land's End Airport - Airspace Change Proposal - Land's End Transit Corridor (LETC) Airspace

Chris,

I've looked at the portal and as yet the only suggested changes seem to be for mandatory conspicuity through radio or transponder. Have I missed something?

--

Director of Aviation Affairs

The Honourable Company of Air Pilots

Air Pilots House

52A Borough High Street,

London, SE1 1XN

www.airpilots.org +44(0) 2074 044 032

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From: Christopher Pearson <cpearson@islesofscilly-travel.co.uk>

Date: Saturday, 28 March 2020 at 00:25

Subject: Land's End Airport - Airspace Change Proposal - Land's End Transit Corridor (LETC) Airspace

Dear All,

Please find attached a letter detailing an Airspace Change Proposal (ACP) being put forward to the Civil Aviation Authority (CAA) for the block of airspace known as the Land's End Transit Corridor (LETC).

The change sponsor is Land's End Airport, however the proposal is being developed by all regular users of the airspace including St. Mary's Airport, Penzance Heliport and the Isles of Scilly Skybus.

This ACP is following the guidance contained within the CAA publication CAP 1616 and you have received this notification as a nominated stakeholder for this proposal.

We are seeking your views, ideas and requirements regarding the LETC to help us develop some design principles to improve the current air traffic environment.

If you require any further information – please do not hesitate to contact me.

I look forward to any comments, or if applicable, a statement of no impact.

Kind Regards,

Chris.

**Christopher Pearson
Airport Manager/SATCO
Land's End Airport**

**T: +44 (0)1736 785227
M: +44 (0)7747 468821**

**cpearson@islesofscilly-travel.co.uk
www.islesofscilly-travel.co.uk**

Land's End Airport, Kelynack, St Just, Penzance, Cornwall, TR19 7RL

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Christopher Pearson

From: St. Just Town Council <info@stjust.org>
Sent: 20 April 2020 15:12
To: Christopher Pearson
Subject: RE: Land's End Airport - Airspace Change Proposal - Land's End Transit Corridor (LETC) Airspace

Mr Pearson

Thank you for your response, which I have shared with councillors ahead of tonight's meeting.

[REDACTED]
MA, MBA, M.Ed, Chartered FCIPD, Cert Legal.
Town Clerk
St Just-in-Penwith Town Council
Library
Market Street
St Just
Penzance
TR19 7HX

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From: Christopher Pearson <cpearson@islesofscilly-travel.co.uk>
Sent: 20 April 2020 14:22
To: St. Just Town Council <info@stjust.org>
Cc: [REDACTED] <[REDACTED]@cornwallcouncillors.org.uk> [REDACTED] <[REDACTED]@stjustcouncil@gmail.com>
Subject: RE: Land's End Airport - Airspace Change Proposal - Land's End Transit Corridor (LETC) Airspace

Dear [REDACTED]

Thank you for your email and invite to join the meeting.

Unfortunately, I can't join the meeting but would like to update you as follows;

As required by the Civil Aviation Authority (CAA), the Airport has asked for feedback from various stakeholders – both aviation associated and non-aviation associated. The proposal is a joint initiative by Land's End and St. Mary's Airport's.

The proposal is more a technical change in the way that the Land's End Transit Corridor (the airspace subject to this ACP) is designated and managed. The aim is to achieve a safer place in which to fly while keeping the airspace as accessible as possible with minimal impact on other users and external factors. The airspace has multiple users and now includes an additional commercial operator (Penzance Helicopters) carrying out Commercial Air Transport passenger and freight movements. Both main commercial users, Skybus and Penzance Helicopters, are in support of the proposal.

One way to achieve an increased safety environment would be to try and create a "known traffic environment" within the Land's End Transit Corridor. We do not envisage this proposal will change any current flight paths / tracks.

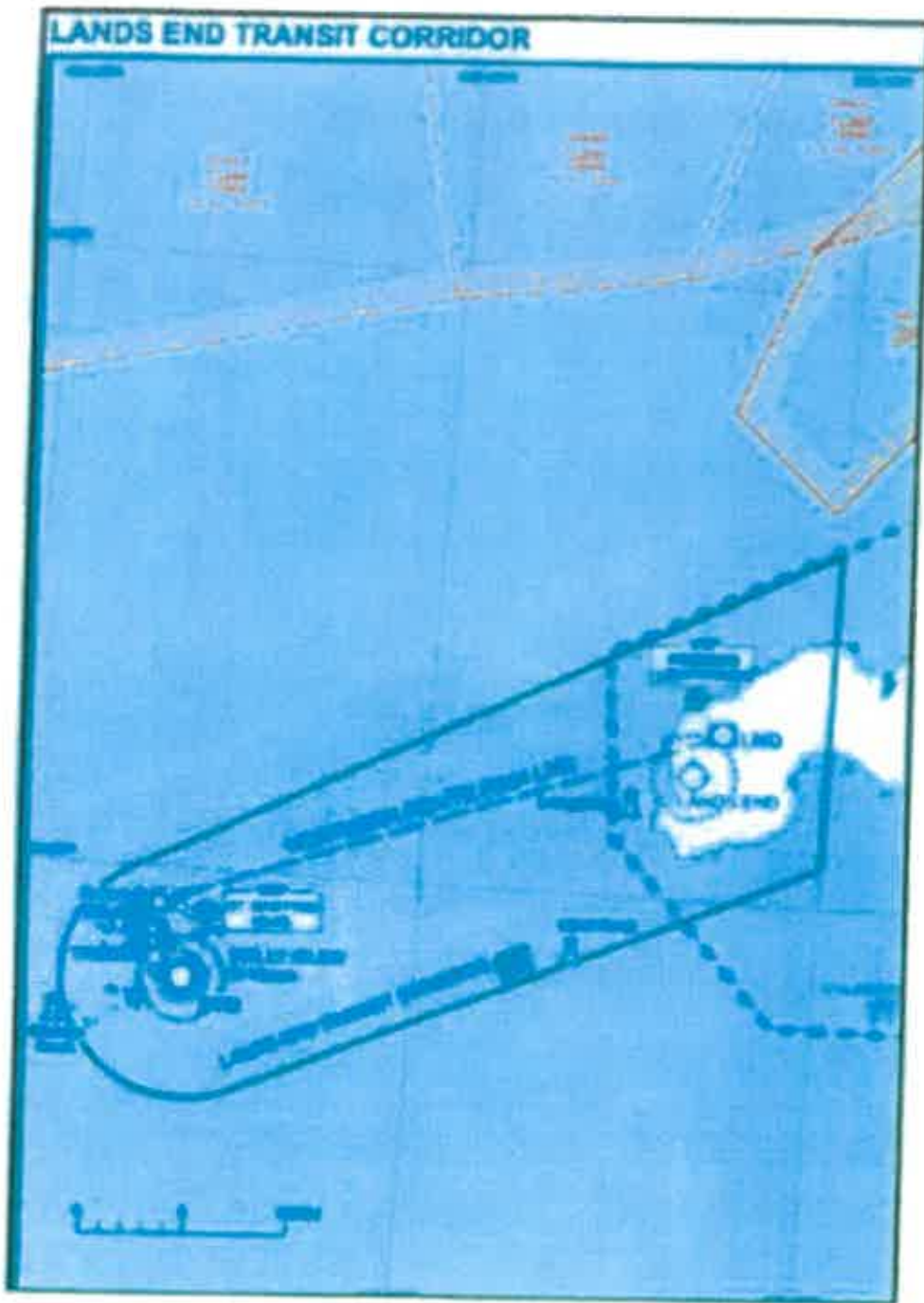
We have received numerous feedback comments – so far either supportive or with no comment.

Meanwhile, at this difficult time, we continue our lifeline service to the Islands (the only way passengers can currently get to/from the Islands is via Land's End Airport) for both keyworkers (support nurses/doctors/etc.) and essential freight (Royal Mail/Medicines/Basic Supplies). Our staff are a very dedicated team (most of whom live locally) who continue to attend work to ensure this essential service can continue.

I hope this update is helpful – I am more than happy to answer any queries that may arise during the course of the meeting.

Wishing you all the Best,

Chris.



From: St. Just Town Council <info@stjust.org>

Sent: 20 April 2020 10:31

To: Christopher Pearson <cpearson@islesofscilly-travel.co.uk>

Cc: [REDACTED] <[\[REDACTED\]@cornwallcouncillors.org.uk](mailto:[REDACTED]@cornwallcouncillors.org.uk)>; [REDACTED] <[\[REDACTED\]@stjustcouncil@gmail.com](mailto:[REDACTED]@stjustcouncil@gmail.com)>

Subject: RE: Land's End Airport - Airspace Change Proposal - Land's End Transit Corridor (LETC) Airspace

Mr Pearson

I would like to update Councillors at the Council Meeting tonight on the above matter. The council will be meeting on-line to discuss several items of business including Land's End Airport - Airspace Change Proposal - Land's End Transit Corridor (LETC) Airspace. Any update on the matter would be welcome, if you wish to join the meeting the link is shown below. If you could let me know of any progress or that you intend to join meeting to update councillors, it would be appreciated.

Topic: St Just Town Council meeting
Time: Apr 20, 2020 07:15 PM London
Join Zoom Meeting
<https://us04web.zoom.us/j/911111111111>
Meeting ID: 911 111 1111
Password: 123456

[REDACTED]
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From: St. Just Town Council <info@stiust.org>
Sent: 02 April 2020 07:57
To: 'Christopher Pearson' <cpearson@islesofscilly-travel.co.uk>
Cc: [REDACTED] <[\[REDACTED\]@cornwallcouncillors.org.uk](mailto:[REDACTED]@cornwallcouncillors.org.uk)>; [REDACTED] <[\[REDACTED\]@stiustcouncil@gmail.com](mailto:[REDACTED]@stiustcouncil@gmail.com)>
Subject: RE: Land's End Airport - Airspace Change Proposal - Land's End Transit Corridor (LETC) Airspace

Mr Pearson

The document in your email will be sent to Councillors but you will be probably be aware that, in these unprecedented times, normal meetings have been suspended. In normal times, I would suggest you be invited to

brief Councillors so they can be clear of the implications of the change, how it might impact our residents and what the alternatives to consider might be. We would welcome your considering delaying the application until Town Council is either able to return to normal meetings or at least that you can be invited to communicate through an on-line conversation, once the Town Council has tested the technology. Town Council's next scheduled meeting is on the 20 April 2020 and that will be the first time members have tried to conduct business virtually and it is necessary to keep matters simple and to those urgent for us to continue to serve the public.

To conclude, I hope you can respond to this request to delay, by 20 April, at which point we can be clearer of whether we will then re-commence normal meeting arrangements or be able to make arrangements for an on-line discussion with Town Councillors, from which they can formulate their views and the Mayor can collate and submit them to you, on the Town Council's behalf.

[REDACTED]
MA, MBA, M.Ed, Chartered FCIPD, Cert Legal.
Town Clerk
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From: Christopher Pearson <cpearson@islesofscilly-travel.co.uk>
Sent: 28 March 2020 00:25
To: Undisclosed recipients:
Subject: Land's End Airport - Airspace Change Proposal - Land's End Transit Corridor (LETC) Airspace

Dear All,

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If you require any further information – please do not hesitate to contact me.

I look forward to any comments, or if applicable, a statement of no impact.

Kind Regards,

Chris.

Christopher Pearson
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