

Civil Aviation Authority - Safety and Airspace Regulation Group

Title of Airspace Change Proposal	St. Athan ILS
Change Sponsor	The Welsh Government
SARG Project Leader	██████████
Case Study commencement date	15/04/2020
Case Study report as at	10/07/2020
File Reference	ACP-2018-35

Instructions

In providing a response for each question, please ensure that the 'Status' column is completed using the following options:

- Yes
- No
- Partially
- N/A

To aid the SARG Project Leader's efficient Project Management it may be useful that each question is also highlighted accordingly to illustrate what is:

resolved  not resolved  compliant 

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1.	Introduction	
2.	Nature of the Proposed Change	Status
	This ACP concerns the publication of the existing St Athan Instrument Landing System (ILS) procedures, previously published in the publicly available Military Aeronautical Information Publication (Mil AIP), into its civilian counterpart, the UK (Aeronautical Information Publication) AIP. The change is required as a result of the change in ownership of the airfield from the Ministry of Defence to the Welsh Government, that subsequently has also involved a change in regulatory oversight from the Military Aviation Authority to the Civil Aviation Authority. In the Statement of Need the sponsor states that: The change to the ILS being published in the UK Civil AIP will require no change to the ILS procedure its track or use.	
2.1	Is it clear how the proposed change will operate and therefore what the likely environmental impacts will be?	Yes
	This ACP concerns a change to the location of publication of the procedures rather than a change to the actual procedures. This ACP does not concern any change in numbers or type, or track of aircraft expected to or using the airport.	

3.	Secretary of State Call-in Noise Criterion	Status
3.1	Is the proposal likely to meet the Secretary of State’s criterion for call-in on noise impacts? If yes, has the additional assessment on that criterion been undertaken and what are the results? If no, what is the rationale for that conclusion?	No
	The criterion, as set out in the DfT’s Air Navigation Guidance (2017) ¹ is that the proposed airspace change could lead to a change in noise distribution resulting in a 10,000 net increase in the number of people subjected to a noise level of at least 54 dB ² <u>as well as</u> having an identified adverse impact on health and quality of life. ³	

¹ The DfT’s call-in criteria are set out in The Civil Aviation Authority (Air Navigation) Directions 2017, Section 6, paragraph (5) and were amended by The Civil Aviation Authority (Air Navigation) (Amendment) Directions 2019 to include reclassification of Class G Airspace. These Directions are replicated in Annex D of the DfT’s Air Navigation Guidance 2017.

² LAeq 16h noise exposure.

³ The assessment of the numbers of people affected and the associated adverse impacts on health and quality of life of the airspace change proposal should be carried out by the sponsor in accordance with the requirements set out in the DfT’s Guidance.

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	<p>In order for the change to meet the call in criteria, the Secretary of Secretary of State must be satisfied that any one of four call-in criteria apply. These criteria are, that the proposed change:</p> <ul style="list-style-type: none"> • is of strategic national importance or, • could have a significant impact (positive or negative) on economic growth of the United Kingdom, or • could both lead to a change in noise distribution resulting in a 10,000 net increase in the number of people subjected to a noise level of at least 54 dB LAeq 16hr and have an identified adverse impact on health and quality of life, or • could lead to any volume of airspace classified as Class G being reclassified as Class A, C, D or E <p>The Altitude Based priorities dictate that in the airspace from the ground to 4,000 feet (amsl) the Government’s environmental priority is to minimise the noise impact of aircraft and the number of people on the ground significantly affected by it;</p> <p>While this Airspace Change Proposal will impact on airspace at 4,000ft and under (where the Government considers the priority to be noise related) in reality is only a change to the location of publication of the procedures, it is not anticipated that it will have any effect on, or result in any change to the number of people predicted to be exposed to a noise level of at least 54dB LAeq. It therefore does not satisfy the government’s call in criteria.</p>	
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4.	Statement of Need	Status
4.1	Does the Statement of Need include any environmental factors?	No
	No, this ACP is being requested as a result of the change of ownership of the airport from the Ministry of Defence to the Welsh Government, that prompts the need for the airport to change in terms of regulation from Military to Civil	

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5.	Design Principles	Status
5.1	Does the final set of Design Principles include any environmental objectives?	Yes
	<p>Yes the following are included as design principles for this change:</p> <p>Procedures must be designed to minimise aircraft emissions to reduce air pollution</p> <p>Procedures must be designed to minimise the impact of noise below 7,000ft</p> <p>Procedures should be designed to avoid overflight of sensitive areas, e.g. hospitals, schools, country parks high risk industrial sites.</p> <p>Procedures should be designed to provide respite, planned and notified periods where overflight or noise impact are reduced or halted to allow communities undisturbed time.</p>	
5.2	Does the proposal explain how and to what extent the final airspace design achieves any environmental Design Principles?	Yes
	<p>The proposal explains that this Airspace Change Proposal is only intending to change the location of publication of the ILS procedures from the Military AIP to the Civil AIP. It will not change any other aspect of the operation, forecast traffic mix or traffic numbers. The sponsor has reiterated this consistently throughout the documents supplied. As a result of the change proposal only altering the location of publication of procedures, there is not anticipated to be any effect on the flight operations at the airport, also therefore no effect on the subsequent environmental effects of those operations. This is explained in numerous locations throughout the documents presented.</p>	
5.3	Were there any proposed environmental Design Principles that were rejected from the final set? If so, is the rationale for rejecting those Principles reasonable?	N/A
5.4	Were there any design options during the airspace change process that might have better met the environmental Design Principles than the final proposal as submitted to the CAA? If so, is the rationale for rejecting those options set out?	No
	<p>This change is only intended to affect the location where procedures are published, the change being from the Military AIP to the Civil AIP, therefore achieving this is the only effective option.</p>	
6.	Options Appraisal	Status
6.1	Have environmental impacts been adequately reflected and assessed in the Options Appraisal?	Yes

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	<p>An options appraisal was carried out by the change sponsor, considering the environmental impact of both the 'do nothing' ILS withdrawal scenario and the 'preferred option' of publishing the ILS procedures in the UK's Civil AIP. The baseline scenario against which these options were considered was the situation prior to the removal of the ILS approaches from the UK's MIP on the 01/04/2019. The Full Options Appraisal document submitted by the change sponsor appropriately assesses that the publication of the ILS in the Civil AIP will have no environmental impact compared to the baseline scenario, as it is merely a change to where the approach is published. It is also considered that the removal of the ILS from the military AIP and subsequent publication in the Civil AIP will better enable Civil MRO operators to access the required procedures to gain access the airport.</p>	
<p>6.2</p>	<p>Is the final proposal as submitted to the CAA the airspace design option that also produced the best environmental impacts as assessed by the Options Appraisal? If not, does the rationale for selecting the preferred option adequately explain this choice?</p>	<p align="center">Yes</p>
	<p>As this change only affects the location where the procedures are published, it is not expected that there will be any change to the environmental impacts associated with the change. An options appraisal was carried out by the change sponsor, considering the environmental impact of both the 'do nothing' ILS withdrawal scenario and the 'preferred option' of publishing the ILS procedures in the UK's Civil AIP. The baseline scenario against which these options were considered was the situation prior to the removal of the ILS approaches from the UK's MIP on the 01/04/2019. The Full Options Appraisal document submitted by the change sponsor appropriately assesses that the publication of the ILS in the Civil AIP will have no environmental impact compared to the baseline scenario, as it is merely a change to where the approach is published. It is also considered that the removal of the ILS approaches has the potential to generate a small noise, local air quality and CO₂ emission disbenefit through enabling an increased customer base to access those procedures. Changing the publication location will better enable the airport to continue to operate its MRO business.</p>	

<p>7.</p>	<p>Noise [for Level 1 and Level M1 airspace change proposals]</p>	<p align="center">Status</p>
<p>7.1</p>	<p>Has the noise impact been adequately assessed and presented in the consultation material and the final submission to the CAA, taking account of scalability and proportionality?</p>	<p align="center">N/A</p>
	<p>St Athans has not been required to undertake specific noise analysis associated with this ACP, as this ACP only involves a change to the publication location of the procedures, and no change to the location, orientation or nature of the procedures, traffic mix or traffic forecast, therefore there can be reasonably expected not to be any change to the associated noise impact.</p>	
<p>7.2</p>	<p>If a noise assessment has not been undertaken by the sponsor, has this decision been adequately explained and evidenced in both the consultation material and the final submission to the CAA, and is the rationale reasonable?</p>	<p align="center">Yes</p>

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	Yes, See 7.1 above
7.3	Summary of anticipated noise impacts from the final proposed airspace change.
	This ACP concerns a change in the publication location of the St Athans Procedures from the Military AIP to the Civil AIP consistent with the oversight of the license that is changing from the Military Aviation Authority to the Civil Aviation authority.

8.	CO₂ Emissions	Status
8.1	Has the impact on CO₂ emissions been adequately assessed and presented in the consultation material and the final submission to the CAA, taking account of scalability and proportionality?	Yes
	This change is proposing only to change the location of the publication of the procedures associated with St Athans airport, it does not change the forecast traffic, location or orientation of the procedures, just better enables civil traffic associated with the MRO operation to access the airport.	
8.2	If an assessment of the impact on CO₂ emissions has not been undertaken by the sponsor, has this decision been adequately explained and evidenced in both the consultation material and the final submission to the CAA, and is the rationale reasonable?	Yes
	The sponsor states that to maintain continuous descent when flying VFR without ILS glidepath information pilots may need to more frequently alter their engine power settings below 1000 ft (the threshold for air quality measurements) with an associated increase in fuel burn. This may have a potential minor adverse impact on air quality and emissions. Conversely, if the proposal is approved, as there is no change in the track or slope from the procedure published in Mil AIP, aircraft will be flying more predictable approach paths and there will be no change to air quality compared to before the ILS procedure was withdrawn from the Military AIP.	
8.3	Summary of anticipated impact on CO₂ emissions from the final proposed airspace change.	
	The proposal does not affect the number type or location of aircraft operating at St.Athans airport, it merely seeks to alter the location where procedural information is published. Therefore there is not expected to be any change to emissions or local air quality as a result of this proposal.	

9.	Local Air Quality [for Level 1 and Level M1 airspace change proposals]	Status
9.1	Has the impact on Local Air Quality been adequately assessed and presented in the consultation material and the final submission to the CAA, taking account of scalability and proportionality?	N/A

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	That the proposed changes do not affect vertical or lateral tracks below 1,000ft (where the altitude based priorities dictate Local Air quality should be a priority) is confirmed in the consultation document. The nearest AQMA to this change is located at approximately 1.91 m to the East of the airport, so with the predominant wind direction being from the South West it could not reasonably be expected to be impacted to any change at the airport, should any arise which they are not expected to given the nature of this proposal at 1,000ft and below.	
9.2	If an assessment of the impact on Local Air Quality has not been undertaken by the sponsor, has this decision been adequately explained and evidenced in both the consultation material and the final submission to the CAA, and is the rationale reasonable?	N/A
	The nearest AQMA to this change is located 1.91m to the East of the airport, and as such is unlikely to be impacted by the changes proposed as a result of the predominant wind direction (which is from the South West).	
9.3	Summary of anticipated impact on Local Air Quality from the final proposed airspace change.	
	This change does not seek to impact the type number or location of movements at and below 1,000ft therefore cannot be reasonably be expected to impact on local air quality. In addition to this, the nearest location where Air Quality limit values are at risk of being exceeded (the closest AQMA) lies 1.91m to the East of the airport and as such is unlikely to be affected by any of the operations at the airport.	

10.	Tranquillity [for Level 1 and Level M1 airspace change proposals]	Status
10.1	With specific reference to Areas of Outstanding Natural Beauty and National Parks - Has the impact on tranquility been adequately considered and presented in the consultation material and the final submission to the CAA, taking account of scalability and proportionality?	N/A
	The proposal is not expected to change traffic patterns or flight behaviour, merely the location of publication of procedures, therefore no changes to environmental impacts are anticipated, this includes any impact on tranquillity.	
10.2	If consideration of the impact on tranquility has not been undertaken by the sponsor, has this decision been adequately explained and evidenced in both the consultation material and the final submission to the CAA, and is the rationale reasonable?	N/A
	The sponsor has adequately explained that this ACP is expected to have no impact on traffic patterns or flight behaviour as the key element is the change to the location of publication of procedures in accordance with the change of ownership and operation of the airport.	
10.3	Summary of anticipated impact on tranquillity from the final proposed airspace change.	
	The proposed change is expected to have no impact on traffic patterns or flight behaviours, merely the location where procedures are published, therefore no impacts upon tranquillity are anticipated.	

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11.	Biodiversity [for Level 1 and Level M1 airspace change proposals]	Status
11.1	Has the impact on biodiversity been adequately assessed and presented in the consultation material and the final submission to the CAA, taking account of scalability and proportionality?	N/A
	As biodiversity was not included as a design principle by stakeholders for this change and as the proposed change does not involve any change to traffic patterns or flight behaviours, it is appropriate that no assessment be undertaken.	
11.2	If assessment of the impact on biodiversity has not been undertaken by the sponsor, has this decision been adequately explained and evidenced in both the consultation material and the final submission to the CAA, and is the rationale reasonable?	N/A
	The sponsor has adequately explained that the proposed change is not expected to alter traffic patterns or flight behaviour and therefore it is not expected to have any adverse impact on biodiversity. As per CAP1616: 'most airspace change proposals are unlikely to have an effect upon biodiversity and therefore the inclusion within the design principles is expected to be the full extent of any consideration in most instances.'	
11.3	Summary of anticipated impact on biodiversity from the final proposed airspace change.	
	No impact on biodiversity is expected as a result of this change as the change is not anticipated to have any impact on traffic patterns or flight behaviour. The only predicted change is to the location where procedures are published.	
12.	Traffic Forecasts	Status
12.1	Have traffic forecasts been provided, are they reasonable, and have these been used to reflect the anticipated environmental impacts of the proposal?	N/A
	The proposed change is not expected to impact on predicted traffic patterns or flight behaviour, including the number of flights, the nature of the business at St Athans means it is not possible to accurately predict traffic thus, no traffic forecasts were required to be submitted or considered as part of the assessment.	
13.	Consultation	Status
13.1	Has the sponsor taken account of any environmental factors (noise, CO₂ emissions, local air quality, tranquility or biodiversity) raised by consultees or has evidence been provided to indicate why this has not been possible?	N/A

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	As the proposal is not expected to lead to any changes in traffic patterns or flight behaviour, no environmental impacts are anticipated.	
13.2	Has the sponsor taken account of any consultation response submitted by ICCAN? If so, what are the outcomes?	N/A
	No environmental consultation was entered into as part of this ACP as it did not intend to alter flight patterns behaviour or traffic nature or numbers, so no noise impact can reasonably be expected as a result of the proposal and ICCAN were therefore not consulted. These factors were all justified in a separate document submitted to and accepted by, the CAA .	

14.	Public Evidence Session (if held)	Status
14.1	If a Public Evidence Session has been held, was any <u>new</u> evidence on potential environmental impacts presented?	N/A
	Not applicable, no public evidence session has been held for this change.	
14.2	If so, was the new evidence relevant and material to the CAA's consideration of the environmental impacts of the submitted airspace change proposal?	N/A
	Not applicable, no public evidence session has been held for this change.	

15.	Compliance with policy and guidance from Government or the CAA	Status
15.1	Has the sponsor satisfied all relevant policy and/or guidance from either the Government, ICCAN or the CAA, with regards to environmental impacts of the proposed airspace change?	Yes
	The Sponsor has complied with all requirements placed on them and also provided adequate justification for deviation from the formal process where appropriate. As of July 2020, ICCAN are yet to issue any ACP environmental Guidance relevant to this ACP.	
15.2	Has the sponsor adequately considered the DfT's Altitude-Based Priorities⁴?	Yes
	This change involved only an alteration of where procedural information, that enables traffic to access the airport, was published, movement of that information from the Military AIP to the Civil AIP, no change to the nature, type or orientation of traffic was proposed as part of this ACP.	

⁴ Paragraph 3.3, DfT's Air Navigation Guidance 2017

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16.	Other Aspects	Status
16.1	Are there any other aspects of the airspace change proposal that have not already been addressed in this report but that may have a bearing on the environmental impact?	No
	None.	

17.	Recommendations	Status
17.1	Are there any recommendations for conditions or undertakings to be included with the CAA's decision?	No
	None.	
17.1	Are there any recommendations for the Post-Implementation Review requirements?	Yes
	Monitor flight numbers and behaviour before and after the change, to ensure there are no changes to traffic patterns or flight behaviours, and no significant increase in unequipped traffic	

18.	Summary of Assessment of Environmental Impacts & Conclusions
	The focus of this airspace change proposal is to change the location of publication of the procedures associated with accessing St. Athans airport. It does not concern any change to the location or nature of procedures used to access the airport, nor does it affect the forecast or make-up of traffic expected to use the airport. Therefore there is not expected to be any change to the environmental effects associated with the change. That this is the case has been evidenced by the sponsor throughout their submission or where appropriate adequate justification provided by the sponsor as to why this is the case.

Outstanding Issues?		
Serial	Issue	Action Required
1		

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2

Environmental Assessment & Statement Sign-off and approval	Name	Signature	Date
Environmental Assessment & Statement completed by:	██████████, Airspace Regulator (Environment)	██████████	10/07/20
Environmental Assessment Approved by: (Manager Airspace Regulation)	██████████	████████████████████	10/07/20