

Appendix D

Land's End Airport Ltd

Stage 2A (OPTIONS DEVELOPMENT)

Appendix D: Evidence of Stakeholder Engagement

Email Engagement Stage 2A

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Christopher Pearson

From: [REDACTED] (DAATM-Airspace Strategy SO2) [REDACTED]
@mod.gov.uk>
Sent: 11 September 2020 08:55
To: Christopher Pearson
Subject: MOD Response to LETC Stage 2 ACP

Chris,

Thank you for the opportunity to assess your Design Options for the LETC ACP.

These have been disseminated throughout all relevant MOD Stakeholders and the MOD do not have a specific preference between Options 1 and 2. Either the establishment of a RMZ or Combined RMZ/TMZ within the current geographical confines of the LETC would not pose any safety concerns to current MOD operations, specifically those of RNAS Culdrose, as current working relationships between the two agencies are strong and robust. We are very keen to see these relationships continue.

The MOD would like to remain involved in the forward development of this ACP and any agreements that may be established between neighbouring airspace users.

If you need anything further, please do not hesitate to get in contact.

Regards,

[REDACTED]

[REDACTED] | SO2 Airspace Strategy | Defence Airspace and Air Traffic Management |
Aviation House | 1E Beehive Ringroad Crawley West Sussex RH6 0YR | Civilian Telephone: +44 (0) [REDACTED] |
MOD Net: DAATM-AirspaceStrategySO2 | E-Mail: [REDACTED]



ACP-2019-75

Proposed airspace changes to the Land's End Transit Corridor

Stakeholder Feedback Form

Name	[REDACTED]
Organisation	Sloane Helicopters (Penzance Heliport)
Email Address	[REDACTED]
Telephone Number	[REDACTED]

Options Appraisal

The change sponsor, Land's End Airport Ltd, has appraised all the available options and come to the conclusion that there are two viable options to take forward in this process, however we are open to receiving feedback on all of the above options.

All Options	Feedback on all available options
Option 1	Establish an RMZ
Option 2	Establish a combined RMZ/TMZ

Please provide feedback, using the following tables, for both options.

We thank you for taking time to engage with us in this important part of the airspace change proposal. Please would you return any completed forms to us before 1230 on 11th September 2020.

All Options

General Feedback on all Options

Please provide feedback on any of the above options in section 2

From the viewpoint of a commercial operator any change to the LETC must recognise the financial viability aspects together with any safety or operational advantages. It is agreed that greater 'situational awareness' of aircraft (fixed and rotary-wing) inside or close to the LETC would be beneficial.

It is likely that a radar feed from Newquay or Culdrose would not provide adequate coverage for helicopter traffic at 500ft inside the LETC. Installing a suitable ATC radar at EGHC or EGHE is likely to result in good radar cover but significant costs that may be unacceptable financially.

Reclassifying the LETC as Class D or E airspace is not supported as this would add unacceptable ATC delays for helicopter flights within the LETC in/out of EGHK.

RMZ/TMZ is fully supported.

Use of ADS-B is fully supported to provide additional 'situational awareness' (even though not ATC cleared)

Please provide feedback on any particular safety issues that concern your organisation and how these should be addressed.

Nil

Please provide any further comments or questions. We will get in touch to answer your queries.

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Option 1 Establish an RMZ

Please provide feedback on how establishing an RMZ would affect the operations or interests of your Organisation.

Nil effect on Penzance Helicopters.

Please provide feedback on any particular safety issues that concern your organisation and how these should be addressed.

Nil

Please provide any further comments or questions. We will get in touch to answer your queries.

Option 2 Establish a Combined RMZ/TMZ

Please provide feedback on how establishing a Combined RMZ/TMZ would affect the operations or interests of your Organisation.

Nil effect on Penzance Helicopters.

Please provide feedback on any particular safety issues that concern your organisation and how these should be addressed.

Christopher Pearson

From: [REDACTED]@naturalengland.org.uk>
Sent: 08 September 2020 11:58
To: Christopher Pearson
Subject: FW: 2020-09-18 327130 (Response by 11/09) Airspace Change Proposal - Land's End Transit Corridor (LETC) Airspace - Land's End Airport (Isle of Scilly)
Attachments: 2020-09-03 Land's End Airport - LETC ACP - Step 2A - Develop & Assess.pdf; 313254 NE Response Airspace Change Proposal Land's End Transit Corridor (LETC) Airspace St Mary's Airport Isle of Scilly.pdf
Importance: High

Hello Chris

Thank you for this consultation. I refer you to my previous response regarding this proposal (attached FYI). I would also just add that if the previous LETC has not been assessed under the Habitats Directive, then a position of no change from previous does not preclude the requirement for a Habitats Regulations Assessment (HRA) of the proposal.

Regards

[REDACTED]

[REDACTED]

Lead Adviser

Devon, Cornwall and Isles of Scilly Area Team

Natural England

Polwhele, Truro, Cornwall, TR4 9AD

[REDACTED]

During the current coronavirus situation, Natural England staff are working remotely to provide our services and support our customers and stakeholders. All offices and our Mail Hub are closed, so please send any documents by email or contact us by phone or email to let us know how we can help you. See the latest news on the coronavirus at <http://www.gov.uk/coronavirus> and Natural England's regularly updated operational update at <https://www.gov.uk/government/news/operational-update-covid-19>.

Stay alert, protect the NHS, save lives.

For information or advice from the Natural England Devon, Cornwall and IoS Team please email us at: DevonCornwallandIslesofScilly@naturalengland.org.uk. Alternatively you can contact us through the Enquiries Service enquiries@naturalengland.org.uk Phone: 0300 060 3900

www.gov.uk/natural-england



Date: 02 April 2020
Our ref: 313254
Your ref: ACP-2019-75



Customer Services
Hornbeam House
Crewe Business Park
Electra Way
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Cheshire
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T 0300 060 3900

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

Christopher Pearson

From: DCIS Enquiries <DCISEnquiries@environment-agency.gov.uk>
Sent: 10 September 2020 14:19
To: Christopher Pearson
Subject: GE20/DCIS/12103 Land's End Airport - Airspace Change Proposal - Land's End Transit Corridor (LETC) Airspace

Dear Chris,

Thank you for your email dated 04/09/2020. We respond to requests under the Freedom of Information Act 2000 and Environmental Information Regulations 2004.

The preferred options identified through the appraisal state that there are no increased environmental impacts of noise or pollution expected so we have no further comments.

Please refer to [Open Government Licence](#) which explains the permitted use of this information.

Thank you

[Redacted]
[Redacted]
Customers and Engagement Officer
Environment Agency | Manley House, Kestrel Way, Exeter EX2 7LQ

Devon, Cornwall and Isles of Scilly enquiries team:
Email : DCISEnquiries@environment-agency.gov.uk



From: Christopher Pearson [<mailto:cpearson@islesofscilly-travel.co.uk>]
Sent: 04 September 2020 15:09
Subject: Land's End Airport - Airspace Change Proposal - Land's End Transit Corridor (LETC) Airspace
Importance: High

Dear All,

Please find attached a document detailing the next stage of our 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, Tresco Heliport, Sloane Helicopters and 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.

Christopher Pearson

From: St. Just Town Council <info@stjust.org>
Sent: 10 September 2020 08:27
To: Christopher Pearson
Subject: RE: Polite Reminder: Land's End Airport - Airspace Change Proposal - Land's End Transit Corridor (LETC) Airspace

Mr Pearson

Thank you for the reminder; all information has been shared with Councillors.

[REDACTED]
BA (Hons), BSc (Hons), BA (Open), GCLI, Cert Legal.
PG Diploma Bus & Fin, MA, MBA, M.Ed, Chartered FCIPD.
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(Mon, Wed, Thurs, 8am - 4pm)
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From: Christopher Pearson <cpearson@islesofscilly-travel.co.uk>
Sent: 09 September 2020 17:00
To: Undisclosed recipients:
Subject: Polite Reminder: Land's End Airport - Airspace Change Proposal - Land's End Transit Corridor (LETC)



ACP-2019-75

Proposed airspace changes to the Land's End Transit Corridor

Stakeholder Feedback Form

Name	[REDACTED]
Organisation	St Mary's Airport
Email Address	[REDACTED]
Telephone Number	[REDACTED]

Options Appraisal

The change sponsor, Land's End Airport Ltd, has appraised all the available options and come to the conclusion that there are two viable options to take forward in this process, however we are open to receiving feedback on all of the above options.

All Options	Feedback on all available options
Option 1	Establish an RMZ
Option 2	Establish a combined RMZ/TMZ

Please provide feedback, using the following tables, for both options.

We thank you for taking time to engage with us in this important part of the airspace change proposal. Please would you return any completed forms to us before 1230 on 11th September 2020.

All Options General Feedback on all Options

Please provide feedback on any of the above options in section 2

Please provide feedback on any particular safety issues that concern your organisation and how these should be addressed.

Please provide any further comments or questions. We will get in touch to answer your queries.

Option 1 Establish an RMZ

Please provide feedback on how establishing an RMZ would affect the operations or interests of your Organisation.

Please provide feedback on any particular safety issues that concern your organisation and how these should be addressed.

Please provide any further comments or questions. We will get in touch to answer your queries.

Option 2 Establish a Combined RMZ/TMZ

Please provide feedback on how establishing a Combined RMZ/TMZ would affect the operations or interests of your Organisation.

We agree that this would be the best option for all airspace users in the LETC. It would ensure a more complete picture of traffic in the corridor for ATCOs on both sides of the route.

Please provide feedback on any particular safety issues that concern your organisation and how these should be addressed.

We believe that the establishment of RMX & TMZ in the LETC would greatly improve safety, particularly in regards to GA traffic.

Please provide any further comments or questions. We will get in touch to answer your queries.



ACP-2019-75

Proposed airspace changes to the Land's End Transit Corridor

Stakeholder Feedback Form

Name	[REDACTED]
Organisation	Perranporth Flying Club Ltd. CASC
Email Address	[REDACTED]
Telephone Number	[REDACTED]

Options Appraisal

The change sponsor, Land's End Airport Ltd, has appraised all the available options and come to the conclusion that there are two viable options to take forward in this process, however we are open to receiving feedback on all of the above options.

All Options	Feedback on all available options
Option 1	Establish an RMZ
Option 2	Establish a combined RMZ/TMZ

Please provide feedback, using the following tables, for both options.

We thank you for taking time to engage with us in this important part of the airspace change proposal. Please would you return any completed forms to us before 1230 on 11th September 2020.

All Options General Feedback on all Options

Please provide feedback on any of the above options in section 2

The Preferred option of Perranporth Flying Club is a TMZ. See Option 2 Comments below. Perranporth Flying Club actively supports safety initiatives (e.g. it has a project to enhance conspicuity throughout Cornwall) but has concerns that there are unintended consequences of the ACP that need to be addressed.

The safety assessments of section 3 are generally not contentious but see further comments below concerning MLAT.

Options 2.2 RADAR feed: Ideally the costing for this would have been developed.

Option 2.3 installed RADAR. The cost of an SSR is in the of the order of £2,000,000. Amortised over 5 years with 6473 Skybus flights (2019 timetable) and 1300 flights from Penzance, this is about £5 per seat. It is recognised that this probably exceeds the value of the safety benefit of ATC being able to provide a higher level of service to participating aircraft and aid with sequencing and deconfliction with the potential to operate more than one IFR aircraft in the LETC at a time.

Option 2.4, Class D controlled airspace. In the absence of RADAR, separation would be procedural. Given the one aircraft at a time limitation, the assessment of a questionable benefit is understood. The assessment also mention an issue with coordinating ATC units. Would a single authority resolve this?

Option 2.5 Class E controlled airspace. The SERA would prevent GA traffic from operating VFR on many days. However, this meets an objective to protect IFR traffic on instrument approach.

Please provide feedback on any particular safety issues that concern your organisation and how these should be addressed.

Another reason why the creation of a controlled environment by a change in the airspace classification is undesirable (Options 2.4 & 2.5) is that it moves the deconfliction problem from the LETC to the boundary. GA and commercial traffic that cannot enter the LETC due to capacity will be concentrated close the boundary with a high risk of collision when orbiting. A solution for the GA traffic would be to break radio contact with the Land's End (LE) ATC and get a service from Newquay (NQY) or Culdrose (CLD). NQY/CLD and LE would then need to coordinate to advise the traffic when they get a clearance to enter the LETC. This is an additional source of workload, safety and timing issues regarding co-ordination between ATC units to that identified in the ACP assessment.

This leads to an alternative solution for consideration where NQY provide a Radar service to Commercial traffic using the instrument approach on an as required basis.

Please provide any further comments or questions. We will get in touch to answer your queries

To help an understanding of the problem to be resolved and mature the ACP, would it be possible to have some more detail about the top 5 risks in the register that are referenced in the ACP?

Also, it is understood that the ACP process has been prompted by MOR/airprox incidents. Would it be possible to have references to these?

It was noted that a Multilateration (MLAT) system in accordance with CAP 670 SUR02 was not evaluated as an option. The performance approaches that of an SSR but at an order of magnitude lower cost.

As to the ACP, did this include a change to the shape of the LETC to protect the instrument approaches at Land's End and Penzance?

Does the ACP include a proposal for the LETC to be controlled by a single authority rather than the three (Culdrose, Land's End, Scillies) referenced on the chart (2171CD Ed 46) as contacts?

Option 1 Establish an RMZ

Please provide feedback on how establishing an RMZ would affect the operations or interests of your Organisation.

Residents of the Scillies operate aircraft from Perranporth. They contribute to the financial viability of the Club and the airfield. Also, pre Covid-19, the Scillies was a popular destination for members due to the ease of access and its special nature.

Any reduction in the utility of members aircraft may cause a decline in ownership and club membership.

It is recognised that an RMZ would offer ATC a greater level of information regarding aircraft operating within the LETC as all aircraft would need to have and operate radio equipment. Contact with ATC would have to be made before entry into the LETC, however, a clearance would not be necessary.

A limitation of the latter is that entry can be denied by ATC declining to establish two-way communication with "standby".

The concern therefore is that the success of an RMZ depends on ATC being adequately resourced.

All aircraft at Perranporth have radios, thus being equipped does not cause a cost.

Please provide feedback on any particular safety issues that concern your organisation and how these should be addressed.

The creation of an RMZ risks moving the deconfliction problem from the LETC to the boundary. GA traffic that cannot enter the LETC because workload or other factors that prevent two-way communication will be concentrated close the boundary with a high risk of collision when orbiting. The GA traffic is prevented from getting a service from Newquay or Culdrose to mitigate the hazard when communication is locked in "Standby".

Please provide any further comments or questions. We will get in touch to answer your queries

The unhappy experience of the GA community is that "Standby" is used to prevent access to RMZs. Is this likely to be an issue with the LETC?

Option 2 Establish a Combined RMZ/TMZ

Please provide feedback on how establishing a Combined RMZ/TMZ would affect the operations or interests of your Organisation.

The addition of a TMZ would not have a significant impact since all aircraft at Perranporth are transponder equipped.

Please provide feedback on any particular safety issues that concern your organisation and how these should be addressed.

The view is that the conspicuity afforded by the carriage of transponders by GA aircraft and the TCAS on board the commercial aircraft provides a robust solution without the need for the additional burden on the ATC of an RMZ.

A TMZ avoids the hazard of creating a conflict zone at the LETC boundary.

Please provide any further comments or questions. We will get in touch to answer your queries

A TMZ as opposed to RMZ/TMZ would have least impact on the members of Perranporth Flying Club.

Considering the future, ADS-B out is becoming a low cost for GA aircraft and offers the prospect high integrity at low cost for ground stations as well.

Would Land's End expect to transition to an ADS-B or MLAT based TMZ (away from an RMZ) as these technologies mature?



ACP-2019-75

Proposed airspace changes to the Land's End Transit Corridor

Stakeholder Feedback Form

Name	[REDACTED]
Organisation	Cornwall Airport Newquay
Email Address	[REDACTED]@cornwallairportnewquay.com
Telephone Number	[REDACTED] / [REDACTED]

Options Appraisal

The change sponsor, Land's End Airport Ltd, has appraised all the available options and come to the conclusion that there are two viable options to take forward in this process, however we are open to receiving feedback on all of the above options.

All Options	Feedback on all available options
Option 1	Establish an RMZ
Option 2	Establish a combined RMZ/TMZ

Please provide feedback, using the following tables, for both options.

We thank you for taking time to engage with us in this important part of the airspace change proposal. Please would you return any completed forms to us before 1230 on 11th September 2020.

All Options

General Feedback on all Options

Please provide feedback on any of the above options in section 2

With the current staffing and qualifications of the staff at Lands End ATC the only viable options are the RMZ or a combined RMZ/TMZ

Please provide feedback on any particular safety issues that concern your organisation and how these should be addressed.

Please provide any further comments or questions. We will get in touch to answer your queries.

Option 1 Establish an RMZ

Please provide feedback on how establishing an RMZ would affect the operations or interests of your Organisation.

The establishment of an RMZ would have no effect on the operations of Cornwall Airport Newquay.

The Letter of Agreement that is in force between Newquay and Land's End /St Mary's Isles of Scilly Airports requires traffic to be transferred between the ATC units before it enters the LETC.

Newquay is required to coordinate any traffic that wishes to operate within the LETC and requests a Radar service or is involved in unusual activity.

Please provide feedback on any particular safety issues that concern your organisation and how these should be addressed.

The LoA between EGHC, EGHE and EGHQ will need to be updated to reflect any changes to the operational requirements.

Please provide any further comments or questions. We will get in touch to answer your queries.

Option 2 Establish a Combined RMZ/TMZ

Please provide feedback on how establishing a Combined RMZ/TMZ would affect the operations or interests of your Organisation.

A combined RMZ/TMZ has the advantage of giving a known traffic environment and allowing the ACAS systems, where available, to give advanced warning of any possible conflicts.

With neither EGHC or EGHE being radar equipped there is no guarantee that all traffic within the LETC would be operating according to the rules.

Please provide feedback on any particular safety issues that concern your organisation and how these should be addressed.

Although conspicuity codes are available they are not validated and the associated Mode C is not verified. If the Mode C is inaccurate there is a danger that ACAS avoiding action could place the aircraft in danger.

If Culdrose or Newquay are expected to validate and verify the transponder settings this would be an unwelcome increase in controller workload and take attention away from the controllers primary task.

Please provide any further comments or questions. We will get in touch to answer your queries.

Is it envisaged that conspicuity codes would be used in the LETC or is it intended that application be made for the issuing of additional codes?

If additional codes, how would they be validated and verified?

ACP-2019-75 Proposed airspace changes to the Land's End Transit Corridor Stakeholder Feedback Form

Name: [REDACTED]

Organisation: British Helicopter Association

Email Address: [REDACTED]@britishhelicopterassociation.org

Telephone Number: [REDACTED]

Options Appraisal The change sponsor, Land's End Airport Ltd, has appraised all the available options and come to the conclusion that there are two viable options to take forward in this process, however we are open to receiving feedback on all of the above options.

All Options Feedback on all available options:

You have discounted ADSB as an option. A paper has gone to the CAA Board proposing that ADSB 1090/976 is the UK standard for electronic conspicuity with an implementation of early 2023. It is fully expected that this policy will be endorsed by the Board. ADSB is the BHA's preferred option.

Option 1 Establish an RMZ

With the proviso above the BHA has this as a 3rd preference.

Option 2 Establish a combined RMZ/TMZ

This is the BHA's 2nd preference as while not every GA is transponder equipped, and a false sense of security might be given to TCAS and other electronic conspicuity equipped aircraft, there will some safety benefit to aircraft which are equipped.

Please provide feedback, using the following tables, for both options. We thank you for taking time to engage with us in this important part of the airspace change proposal. Please would you return any completed forms to us before 1230 on 11th September 2020. 4 th September 2020 ACP-2019-75 Stakeholder Feedback Form V1 All Options General Feedback on all Options Please provide feedback on any of the above options in section 2 Please provide feedback on any particular safety issues that concern your organisation and how these should be addressed. Please provide any further comments or questions. We will get in touch to answer your queries.

Christopher Pearson

From: Admin Airprox <Admin@airproxboard.org.uk>
Sent: 07 September 2020 10:52
To: Christopher Pearson
Subject: RE: Land's End Airport - Airspace Change Proposal - Land's End Transit Corridor (LETC) Airspace

Good Morning

Thank you for the information. However, we do not comment on airspace changes.

Regards,

Please note that, due to the coronavirus pandemic, I am working from home until further notice. Please use the Skype number below if you wish to contact me by telephone.



[REDACTED] UK Airprox Board
Building 59 | RAF Northolt | West End Road | Ruislip | Middlesex | HA4 6NG
Skype: [REDACTED] Civil: [REDACTED] | Military: [REDACTED]
FAX: [REDACTED]
[REDACTED]@airproxboard.org.uk

From: Christopher Pearson <cpearson@islesofscilly-travel.co.uk>
Sent: 04 September 2020 15:09
Subject: Land's End Airport - Airspace Change Proposal - Land's End Transit Corridor (LETC) Airspace
Importance: High

Dear All,

Please find attached a document detailing the next stage of our 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, Tresco Heliport, Sloane Helicopters and 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 on a set of Airspace Change Options that have been developed following previously defined Design Principles and stakeholder feedback received to date. Please provide further feedback on these Options using the feedback form included in Appendix B of the attached document. The document can also be found using the following web-link:

<https://airspacechange.caa.co.uk/ProposalArea?pID=199>

Christopher Pearson

From: AOPA [REDACTED]@aopa.co.uk>
Sent: 11 September 2020 11:07
To: Christopher Pearson
Subject: Lands end airspace change

Dear Mr Pearson,

I am sorry for the delay in responding as I have recently returned to work and have been catching up with emails. Originally I was not going to respond as there had been no real reaction from GA operators in Cornwall. However in August I visited the region and on the day I was in Lands End the visibility was very poor, nothing was flying that day. I also did a VFR flight out Bodmin and was impressed with the service from Newquay.

I am emailing you as the link does not appear to work and there is nothing relating to this ACP on the link provided.

Having examined the options in the proposal from 2.1 to 2.9 I would like to make the following comments:

Clearly 2.1 is not an option and in 2.2 you do not mention the costs associated with installing radar or the on going costs (unless I have missed this in another document) which will significant and in any case the world is moving towards ADSB for surveillance although there is no mandate for this to enabled in aircraft that have a MTOM of less than 5700kgs at the moment.

The UK is moving towards higher levels of electronic conspicuity probably by 2024 it will be mandated for all aircraft (the DfT are also looking at some funding options to be announced before the end of this year) therefore I suggest that you start with a RMZ, possible with class E airspace in the knowledge that EC will become mandatory. I think that you will save yourself a lot time from some local opposition towards TMZs because both St Marys and Lands End do not accept non radio traffic. Therefore the ACP should build on the evolution of technical changes that will happen nationally as this may be a better option. But also try to encourage the use in GA of EC devices and ones that operate on 1090 kHz because no all of them do- this is important where TCAS needs to see 1090 rather than some other system. Again this is where we are waiting for a national policy decision.

A comment on cost recovery, I am not sure you can load landing fees or fuel charges for GA in order to recover your costs- this could be counter intuitive as it may put off GA operators from visiting the region and in any case aircraft under two tonnes are exempt from airspace route charges either VFR or IFR therefore any cost recovery that applies to GA will need to be recovered from Government which is the case under the currently legal system.. You will also need to separate in your cost base the make up of the charges as they may apply to GA operators - so we do not support the proposed methods of charging as outlined in the document.

Safety for all airspace users is paramount and I hope you fine my comments constructive .

Kind Regards

[REDACTED]

[REDACTED] AOPA

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ACP-2019-75

Proposed airspace changes to the Land's End Transit Corridor

Stakeholder Feedback Form

Name	[REDACTED]
Organisation	The Honourable Company of Air Pilots
Email Address	[REDACTED]
Telephone Number	[REDACTED]

Options Appraisal

The change sponsor, Land's End Airport Ltd, has appraised all the available options and come to the conclusion that there are two viable options to take forward in this process, however we are open to receiving feedback on all of the above options.

All Options	Feedback on all available options
Option 1	Establish an RMZ
Option 2	Establish a combined RMZ/TMZ

Please provide feedback, using the following tables, for both options.

We thank you for taking time to engage with us in this important part of the airspace change proposal. Please would you return any completed forms to us before 1230 on 11th September 2020.

All Options

General Feedback on all Options

Please provide feedback on any of the above options in section 2

Please provide feedback on any particular safety issues that concern your organisation and how these should be addressed.

Please provide any further comments or questions. We will get in touch to answer your queries.

Option 1 Establish an RMZ

Please provide feedback on how establishing an RMZ would affect the operations or interests of your Organisation.

Please provide feedback on any particular safety issues that concern your organisation and how these should be addressed.

The Honourable Company of Air Pilots supports the concept of establishing a 'known environment' wherever possible as this has benefit to all airspace users including both commercial and general and un-manned aviation.

However, placing new restrictions on airspace access always has potential to export an ANSP operating risk from within that airspace into the surrounding area, by creating of new 'choke points' and increased density of aircraft skirting the edge of a designated RMZ.

Therefore, in any safety appraisal the ANSP and CAA need to consider the external safety impact of their proposal and balance these against the safety benefits that may accrue within the new airspace region. The Air Pilots would expect to see this consideration included in future stages of the consultation.

Please provide any further comments or questions. We will get in touch to answer your queries.

Option 2 Establish a Combined RMZ/TMZ

Please provide feedback on how establishing a Combined RMZ/TMZ would affect the operations or interests of your Organisation.

Please provide feedback on any particular safety issues that concern your organisation and how these should be addressed.

The Honourable Company of Air Pilots supports the concept of establishing a 'known environment' wherever possible as this has benefit to all airspace users including both commercial and general and un-manned aviation.

However, placing new restrictions on airspace access always has potential to export an ANSP operating risk from within that airspace into the surrounding area, by creating of new 'choke points' and increased density of aircraft skirting the edge of a designated RMZ/TMZ.

Therefore, in any safety appraisal the ANSP and CAA need to consider the external safety impact of their proposal and balance these against the safety benefits that may accrue within the new airspace region. The Air Pilots would expect to see this consideration included in future stages of the consultation.

Please provide any further comments or questions. We will get in touch to answer your queries.



ACP-2019-75

Proposed airspace changes to the Land's End Transit Corridor

Stakeholder Feedback Form

Name	[REDACTED]
Organisation	Flynqy Pilot Training
Email Address	[REDACTED]@flynqy.co.uk
Telephone Number	

Options Appraisal

The change sponsor, Land's End Airport Ltd, has appraised all the available options and come to the conclusion that there are two viable options to take forward in this process, however we are open to receiving feedback on all of the above options.

All Options	Feedback on all available options
Option 1	Establish an RMZ
Option 2	Establish a combined RMZ/TMZ

Please provide feedback, using the following tables, for both options.

We thank you for taking time to engage with us in this important part of the airspace change proposal. Please would you return any completed forms to us before 1230 on 11th September 2020.

All Options

General Feedback on all Options

Please provide feedback on any of the above options in section 2

Sitting back and doing nothing with the ever increasing level of technology available within all aspects of aviation is in my humble opinion the wrong thing.

We have all understood and also experienced the Covid19 impact on our ever day life to be being unprepared.

I am realistic that no company has unlimited monies to spend, but any kind of increase of safety and ATC support would be greatly appreciated

Please provide feedback on any particular safety issues that concern your organisation and how these should be addressed.

As an ATO, we advocate to provide and also request the best possible safety for of our flights.

Please provide any further comments or questions. We will get in touch to answer your queries.

Option 1 Establish an RMZ

Please provide feedback on how establishing an RMZ would affect the operations or interests of your Organisation.

We advocate using RT in all aspects of flight.

All pilots have formal RT training during the abinitio training and also post training.

Please provide feedback on any particular safety issues that concern your organisation and how these should be addressed.

It remains my opinion that RT, where possible should be used as a minimum.

Please provide any further comments or questions. We will get in touch to answer your queries.

Option 2 Establish a Combined RMZ/TMZ

Please provide feedback on how establishing a Combined RMZ/TMZ would affect the operations or interests of your Organisation.

Same response as above

Please provide feedback on any particular safety issues that concern your organisation and how these should be addressed.

Please provide any further comments or questions. We will get in touch to answer your queries.

Christopher Pearson

From: Cloud 9 Hang Gliding Paragliding & Paramotoring <info@flycloud9.co.uk>
Sent: 11 September 2020 15:29
To: Christopher Pearson
Subject: Land's End Airport - Airspace Change Proposal - Land's End Transit Corridor (LETC) Airspace

Hi Chris

Re the above not sure if this would have any effect on us but please consider current hang Gliding and Paragliding activities that take place within the proposed corridor. These are mainly coastal soaring but can include cross country flying and thermalling.

Feel free to contact me if you need any clarification.

Thank you

[REDACTED]

On behalf of Cloud 9 and Kernow Hang Gliding and Paragliding Association.

Cloud 9 Hang Gliding & Paragliding
www.flycloud9.co.uk [REDACTED]

[REDACTED]

Christopher Pearson

From: [REDACTED]
Sent: 11 September 2020 12:40
To: Christopher Pearson
Cc: [REDACTED]
Subject: LETC ACP Feedback - Seahawk Gliding Club
Attachments: 20200910-SGC LETC Feedback.docx

Christopher,

PSA the feedback I have written on behalf of Seahawk Gliding Club at RNAS Culdrose.

In general, happy with RMZ but would look to come to an agreement to operate some of our microlights/gliders over the peninsula particularly if combined the RMZ/TMZ is the accepted solution.

More than happy to discuss. Mobile is [REDACTED].

Thanks

[REDACTED]
[REDACTED] | RNAS Culdrose | MoD telephone: [REDACTED] |
BT Telephone: [REDACTED] | [REDACTED]

ACP-2019-75 Proposed Airspace Changes to the LETC

Name: [REDACTED]

Organisation: Seahawk Gliding Club, located at RNAS Culdrose.

Email Address: [REDACTED]@mod.gov.uk, [REDACTED]

Tel: [REDACTED]

All Options

General Feedback:

Seahawk Gliding Club (SGC) operate gliders and a small number of microlight aircraft, primarily at weekends and Summer or at other times the airfield isn't open for military traffic. The RMZ should not affect the powered aircraft due to them being fitted with Radios and the users have RT Licences, however due to weight/cost constraints not all have transponders but do often fly around lands end and to the airport itself. However, both options, on the face of it, will prevent gliders operating within the LETC airspace to varying extents. As glider pilots, when appropriately qualified, we like to utilise natural effects to remain airborne and even attempt cross country flight. Although due to the nature of the peninsula the environmental conditions that allow cross country gliding is quite hard to come by. On occasion pilots do fly cross country flight to the West if the conditions are suitable in that direction, within the LETC but only within gliding range of land – the corridor covers mainly the sea - and mostly only in the Eastern end of the LETC. It would be a shame that this may be denied to future cross-country pilots due to the reclassification of airspace, especially if there isn't much traffic at that moment in time to affect. Noting that these conditions will be infrequent so the increased risk due to gliders would be very minimal. Also, gliders only really operate cross country in good weather so will remain VFR in general, during IMC conditions then gliders should not be flying to affect to pose a risk.

Safety Issues/Concerns:

Nil, appreciate the need for improved SA as a safety factor but noting that there is limited evidence as to the data that informs the reason for introduction of an RMZ/TMZ improving safety. Powered aircraft tend to contact LE Tower when in the LETC as it stands anyway as per current LETC AIP guidance. It would be great to strike a balance that also permits cross country flight in gliders towards the Lands End peninsula to some extent and appreciate the best way involves two way communication, coupled with the fact that this won't happen very often at all, should reduce the overall risk.

Further questions/comments:

Any local agreements that could be established for Culdrose Gliders to continue to fly cross country within the area would be most welcome. More suggestions below. Microlights without transponders would be prohibited from flying their usual routes to Lands End airport and around the peninsula making the TMZ option potentially restrictive and as such we would look to enter into an agreement if the ACP is approved.

Option 1 RMZ:

General Feedback:

Shouldn't affect powered aircraft as previously mentioned. Gliders are all fitted with the appropriate airborne radio equipment. However, this requires pilots have a Radio Telephony Licence to communicate with ATC Units, FIS units and Air/Ground Stations. Glider pilots are not required to hold an RT Licence¹ but without this will limit them to the allocated gliding frequencies. Those pilots without an RT Licence are prohibited from using the radio to transmit but are still able to monitor ATC frequencies. The RMZ option could potentially prevent those without an RT licence from the opportunity to glide within the LETC as most of our pilots who aren't also powered pilots don't have an RT licence.

Safety Issues/Concerns:

Two way comms does sound sensible as it will aid deconfliction and aid situational awareness, particularly if the traffic density is high. It is appreciated that it makes the current LETC more effective with mandatory radio comms as opposed to 'strongly recommended', which I would assume sound airmanship means most people would do anyway. So, in that respect it would be interesting to know how many incidents of aircraft not in two way comms have occurred.

Further Comments/Questions:

Should the ACP be approved we would look to enter into an agreement that pilots of a glider without an RT licence can enter the LETC, VFR only, and primarily over land as they are not going to be using the corridor to transit to the Scillies. They could inform LE ATC before they depart that they are likely to enter and could monitor the LE Tower Frequency. There could possibly be some pre-arranged height/lateral deconfliction, although the nature gliding and finding thermals means that exact track and location etc cannot be guaranteed. The RMZ option will be the least limiting and best option for us as it will only affect cross country qualified pilots who don't hold an RT licence when the weather is just right.

Option 2: RMZ/TMZ

General Feedback:

This will restrict microlight aircraft without transponders from continuing to fly around the peninsula, which they often do, there are limited places to fly in the local vicinity and would stop them heading round the west or even to the Isles of Scilly.

Currently transponders for gliders are not a viable option for various reasons - cost, weight and power consumption as gliders run on comparatively small batteries to run a limited set of low power instruments. Therefore, the TMZ element, on the face of it, would deny gliders from flying in the LETC. Note: All of our gliders do use their own form of collision avoidance, known as FLARM, which is low powered and can be viewed on a site similar to FlightRadar24 - <https://glideandseek.com/>. This could aid awareness but is not compatible with conventional transponder based systems. Cross country flights from Culdrose are not very common due to the environmental characteristics of the peninsula, but there are occasions when we do fly to the west within the LETC and it would be a shame that on the occasion this can happen that it is now denied due to the lack of a transponder.

Safety concerns:

If allowed in without a transponder then we would be not visible to TAS/TCAS aircraft, however we would only operate VFR, and maintain a constant lookout, as should the other aircraft, over the

¹ <https://members.glidering.co.uk/library/laws-rules/radio-guidance/>

peninsula only, on a very limited number of occasions per year and can get 2 way comms to inform every one of our position all as mitigation.

The microlights would do similar position reports and again it would be interesting to know the data and evidence to support the need to mandate transponders to all aircraft within the area and therefore limit restrict our gliders/microlights from flying around the lands end peninsula.

Further Comments/Questions:

I found CAA policy guidance saying that entry can be permitted²stating that *'an aircraft flying within a TMZ without a serviceable transponder is to be flown in accordance with any alternative provisions promulgated for that TMZ or agreed with the Controlling Authority. Prior to entry a pilot must communicate their requirement to the Controlling Authority, alerting them to their presence and intentions, and obtain specific agreement to operate within the TMZ. Pilots of aircraft which are neither non-transponder nor non-radio equipped must contact the Controlling Authority by the most appropriate means in order to seek Controlling Authority agreement to operate within the TMZ.*

Prevailing traffic conditions may preclude TMZ Controlling Authority agreement to non-transponder aircraft (or an aircraft with a non-functioning transponder) to operate within a TMZ.'

This seems fair and that there is potential for flexibility to enter the TMZ without a transponder or even a radio. Another question is would a transponder also be mandatory outside of commercial operating hours? Whereby aircraft would be unable to contact the controlling authority out of hours to negotiate an entry so would not be permitted to enter. If the ACP was accepted we would request an agreement/provisions that Culdrose based gliders and microlights could enter the LETC providing they have gained 2-way comms as per the RMZ, or out of hours with no contact, maybe with blind calls. That should maintain an awareness of our presence and position, adding to safety but not prohibiting our entry. We would not head out to sea, but couldn't rule out a microlight heading to the Isles of Scilly at some point in the future but that could be pre-arranged before departure. Gliders would remain within gliding range of the land only and VFR. Understanding this is still limiting to only pilots who have an RT Licence, this seems like a sensible compromise. I emphasise that due to the nature of gliding, the conditions that allow this to situation to occur for gliders will be few and far between. Also, the club has to be operating (normally weekends) on a suitable day for cross country to the west, with competent cross country pilots around to make use of it. Therefore, due to the very low number of movements, the additional risk will be minimal. However, the reason that cross country is hard to achieve (due to our location surrounded by sea) means that cross country opportunity is very limited, so when conditions become favourable it would be a shame that these conditions couldn't be utilised due to a lack of a transponder, especially if traffic density at the time is low.

Summary

The RMZ option is least restrictive and seems like the best solution from Seahawk Gliding Club point of view. Combined RMZ/TMZ would potentially deny the lands end peninsula to gliders, who on few occasions may fly cross country within it and non-transponder fitted microlights who like to fly around the peninsula and to the airport. If this was the case we would like to come to an agreement that we could still fly within the corridor, in and outside published hours.

² <https://publicapps.caa.co.uk/docs/33/20150814PolicyStatementRMZAndTMZ.pdf>

Christopher Pearson

From: [REDACTED]
Sent: 10 September 2020 08:20
To: Christopher Pearson
Subject: RE: Polite Reminder: Land's End Airport - Airspace Change Proposal - Land's End Transit Corridor (LETC) Airspace

Good Morning,

Thank you for the email regarding the (LETC) Cobham Helicopters has no Feedback pertaining to this subject.

Kind regards

--
[REDACTED]
Cobham Aviation Services UK
T : +44 (0) [REDACTED]
M : +44 (0) [REDACTED]
[REDACTED]

FB Heliservices Limited trading as Cobham Aviation Services UK, Hangar 402, Aerohub 1, St. Mawgan, NEWQUAY, Cornwall, TR8 4HP, UK. +44 (0) 1258 443230 www.cobham.com/aviation-services-uk

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Please consider the environment before printing this email

From: Christopher Pearson <cpearson@islesofscilly-travel.co.uk>
Sent: 09 September 2020 17:00
Subject: Polite Reminder: Land's End Airport - Airspace Change Proposal - Land's End Transit Corridor (LETC) Airspace
Importance: High

CAUTION: This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear All,

This is just a polite reminder to ask those that may not have yet responded to this stage of our ACP to note the deadline detailed in my email below.

Many thanks.

Original Request for Feedback Email:

Please find attached a document detailing the next stage of our 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, Tresco Heliport, Sloane Helicopters and Isles of Scilly Skybus. This ACP is following the guidance contained within the