

**LAND'S END AIRPORT**

**CAP 1616 – AIRSPACE CHANGE  
PROPOSAL**

**FOR THE**

**LAND'S END TRANSIT CORRIDOR  
(LETC)**

-

**STAGE 3 : CONSULT**

**3A: CONSULTATION STRATEGY**

ID : ACP-2019-75



# LAND'S END AIRPORT

## ACP SUBMISSION STEP 3A: CONSULTATION STRATEGY

December 2020 v3.0

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Issue	Month/Year	Change Requests
1.0	Nov 2020	Draft version sent to CAA
2.0	Dec 2020	Draft v2 sent to CAA with updates
3.0	Dec 2020	Final version sent to CAA for Stage 3 Gateway

## i Abbreviations & Glossary of Terms

ACAS	Airborne Collision Avoidance System	Equipment fitted to an aircraft that will provide information on other aircraft regarding range, altitude and bearing.
ACP	Airspace Change Proposal	The process by which a sponsor applies for a change to the design of a part of the UK airspace
ADS-B	Automatic Dependant Surveillance Broadcast	A way for an aircraft to determine its position via satellite navigation and periodically broadcast it, enabling it to be tracked
AIAA	Area of Intense Aerial Activity	
ATC	Air Traffic Control	
ATCA	Air Traffic Control Assistant	
ATCO	Air Traffic Control Officer	
ATCU	Air Traffic Control Unit	
ATM	Aerodrome Traffic Monitor	A type of radar used to assist in the safe operation of runways and airport utilisation
CAA	Civil Aviation Authority	The UK's aviation regulator ensuring that aviation reaches the highest safety standards
CAP	Civil Aviation Authority Publication	
CAT	Commercial Air Transport	
DP	Design Principle	
EC	Electronic Conspicuity	A means of aircraft transmitting their position to other ground or air-based systems
GA	General Aviation	
HEMS	Helicopter Emergency Medical Service	
IFR	Instrument Flight Rules	A term used to describe a pilot flying and navigating the aircraft with reference to the instruments in the flight deck
ISSC	Isles of Scilly Steamship Company	

ISSG	Isles of Scilly Steamship Group	
LETC	Land's End Transit Corridor	
MLAT	Multilateration	A navigation and surveillance technique used to provide information on the position of an aircraft
PAX	Passengers	
PINS	Point In Space	A non-precision instrument approach mainly used by helicopters
RMZ	Radio Mandatory Zone	A designated piece of airspace that requires all aircraft to be fitted with and operate suitable two-way radio equipment
RNAS	Royal Naval Air Station	
RNAV	Area Navigation	A method of navigation that allows an aircraft to choose any course within a network of navigation beacons
SAR	Search and Rescue	
TCAS	Traffic Collision Avoidance System	Suitably equipped aircraft communicate digitally, between themselves, information regarding range, altitude and bearing to provide advice on airborne collision avoidance
TMZ	Transponder Mandatory Zone	A designated piece of airspace that requires all aircraft to be fitted with and operate electronic conspicuity equipment
UK	United Kingdom	

## 1 Introduction

- 1.1 This document forms part of the document set required in accordance with the requirements of the CAP1616 airspace change process.
- 1.2 This document aims to set out the strategy that Land's End Airport Ltd will use to consult and engage with all of the stakeholders identified throughout the process so far as it seeks to further inform them of the options chosen being brought forward.
- 1.3 Land's End Airport is proposing to introduce an improved airspace solution to the Land's End Transit Corridor (an existing block of airspace linking the mainland to the Isles of Scilly) that could provide mitigation to the current unknown traffic environment. With an increase in air traffic movements within the Land's End Transit Corridor, the commencement of a second commercial operator (Penzance Helicopters) and the introduction of multiple IFR approaches (with more planned) a need for an Airspace Change was identified.
- 1.4 The owner of Land's End Airport, the Isles of Scilly Steamship Company (ISSC), has been providing lifeline services between the mainland and the islands for over 100 years. Air services provide a year-round lifeline link between the mainland and the Isles of Scilly and this proposal represents the final stage of a major investment program for the benefit of the island-based community and visitors.
- 1.5 This proposal is related to improving the safety of existing services and not about stimulating new traffic or altering any existing routes. Hence, in accordance with the levels as defined in CAP1616, the CAA has categorised this proposal as a Level 2C change. In line with the requirements for a Level 2C change, the environmental impact assessment has been conducted on the basis of CO2 emissions only. There would be no perceptible change to noise impacts to stakeholders on the ground; hence no noise analysis has been undertaken.
- 1.7 The Land's End Transit Corridor is situated in the far South-West of England and is an established block of airspace approximately 38nm long and 15nm wide (Surface to 4,000ft altitude) linking the mainland to the Isles of Scilly.  
  
It is situated in Class G airspace and partially within the RNAS Culdrose AIAA. (See [Appendix A](#) for diagram)
- 1.8 The LETC is used predominantly by scheduled passenger and freight carrying flights - both fixed-wing and, as of March 2020 from Penzance Heliport, rotary aircraft. In addition, it is used by military aircraft (both fixed-wing and rotary), SAR & Helimed helicopters, Trinity House helicopters, General Aviation flights and other charter and air-taxi operators.  
  
Aircraft using the LETC become funnelled within a very narrow lateral and vertical area of airspace. In order to provide increased protection for all users, and in particular, the scheduled public transport flights - some of which may be conducting IFR RNAV approaches - a need for an airspace change was identified.

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

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

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

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

## 2 Objectives

- 2.1 Land's End Airport has considered the four Gunning principles regarding consultation and so wants to ensure that appropriate stakeholders, who could be negatively or positively impacted by any change to the LETC, are made aware of the of this airspace proposal, are given sufficient information regarding the proposal along with an appropriate length of time to consider it and are given the opportunity to submit feedback about any of the options presented.
- 2.2 Through our engagement activities undertaken so far, Land's End Airport wants to make sure that the correct audience is targeted in an appropriate manner and given the opportunity to respond. We also aim to ensure that the materials we produce provide stakeholders with enough information to respond and the length of the consultation is appropriate for responses and works within the project scope.
- 2.3 Land's End Airport actively encourages a two-way conversation with all stakeholders so that we can engage in a meaningful and fully informed change process and that every voice is heard equally, and any views and opinions expressed are fully considered against the proposed change.

## 3 Summary of Engagement Activity Taken to Date

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

Our general approach was to engage with as many organisations as possible which included:

- those who are currently impacted by Land's End Airport operations and selected those who could be affected by any future changes, even though those changes are expected to have negligible impact.
- those who may have non-aviation related opinions to ensure a full range of factors were considered.

3.2 In forming our stakeholder selection, we covered those referenced in both Appendix C of CAP 1616 and the indicative list in the CAA's engagement plan template. We also used previous ACP engagement experience to assist with the selection (ie our recent RNAV Approach ACP). A full list of targeted stakeholders is included in Appendix B of this strategy.

3.3 In Stage 1, to ensure we were able to correctly communicate to stakeholders and potential stakeholders alike, we utilised not only email but also sent out written letters as well. We chose to write to stakeholders rather than any other approach because of the opinion that the ACP was more of a more technical change and would have a negligible effect on many of the stakeholders. The first engagement documents were sent out on the 26<sup>th</sup> March 2020.

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

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

3.5 Engagement during Stage 2 has been with the stakeholders identified in Stage 1 and three others who had expressed interest during the process so far. Two of the additional stakeholders had heard about the process from a staff member at the airport and so we included them in the engagement. The third, Cobham Aviation Services Ltd, were starting to be interested in operating from Land's End and so we engaged with them as well.

Since we had email contact details for all stakeholders, it was deemed to be appropriate and sufficient to email, rather than post, a copy of the design options on 4<sup>th</sup> September 2020 asking for feedback to be submitted by the 11<sup>th</sup> September. Due to COVID pressures and staff availability we were only able to offer one week until the response deadline but considered that this was adequate due to the seemingly non contentious and mostly technical nature of the options being presented. This was proven to be so as we received a good number of items of feedback from a variety of stakeholders that were also more detailed than in Stage 1. A follow up email was sent out to all on the 9<sup>th</sup> September to remind all stakeholders of the deadline for feedback.

A further email was sent to all stakeholders on the 7<sup>th</sup> October with an option that was omitted from the 7<sup>th</sup> September email. The option omitted was “Alter the size and dimensions of the LETC”. Again, one week was offered as ample time for this option to be considered for the same reasons stated above.

- 3.6 All of this engagement has been documented and has been considered in the final design options and drafting of the stage 3 consultation documentation.
- 3.7 As yet none of the stakeholders has objected to the proposal and we have received a number of suggestions on how we might develop the LETC to ensure safety standards are as high as they can be.
- 3.8 This ACP originally considered the baseline do-nothing option and nine alternatives which could be used to provide enhanced safety within the LETC. After Stage 2, Step 2b Options Appraisal, many of the options were discounted and following the process of selecting options we are progressing the following. All the options under consideration are;
1. RMZ
  2. Combined RMZ/TMZ
  3. RMZ + Alter the size of the LETC
  4. Combined RMZ/TMZ + Alter the size of the LETC (Preferred)

The preferred option is to implement a Combined RMZ/TMZ and alter the size of the LETC to encompass the IAPs at Land’s End and St Mary’s airports.

- 3.9 There were two stakeholders who expressed a wish to be removed from the stakeholder engagement list, UK Airprox Board & Cornwall CPRE, all of the other stakeholders listed in Stage 2, Step 2a Appendix C, will be engaged during Stage 3 Consultation.
- 3.10 The stakeholder engagement summarised above, shows that appropriate engagement has occurred via appropriate mechanisms and that feedback has been received and acted upon throughout the process.

## **4 Audience**

- 4.1 Land’s End Airport has decided to target a number of different types of organisations and stakeholders regardless of whether they are aviation orientated or otherwise. We identified several groups that wouldn’t ordinarily have contact with an airport and have included them to ensure that they have an opportunity to have their voices heard regarding any proposed change. We chose this approach because of the high-profile nature of the lifeline air link between Land’s End Airport and the Isles of Scilly. We felt that it was important for as many potentially interested or effected organisations to be identified and engaged with at the earliest opportunity. All of these stakeholders, minus the two mentioned in 3.9 above, will be targeted again during stage 3 and asked



to respond to the consultation. The full list of targeted stakeholders during stage 3 is detailed in Appendix B of this document.

4.2 Land’s End Airport has decided to be in as much direct contact with targeted stakeholders as possible. On some occasions we are in contact with an organisation rather than an individual to facilitate communication, for example we contacted the Chief Flying Instructor at Perranporth Flying Club rather than attempt their entire membership, the same with organisations such as AOPA, Seahawk gliding club, GATCO and local organisations such as St Just Town Council and Cornwall Protection of Rural England.

4.3 Within the full list of targeted stakeholders in stage 3 some key stakeholders have been identified that will be directly affected by any of the proposed changes to the LETC. These key stakeholders are detailed below in 4.3 table 1.

4.4 Table 1

Stakeholder	Affected how?
RNAS Culdrose	Positively
Sloane Helicopters	Positively
Environment Agency	Negligible affect, just information to reassure no negative impact on environment
Natural England	Negligible affect, just information to reassure no negative impact on environment
St Mary’s Airport	Positively
Isles of Scilly Skybus	Positively
Perranporth Flying Club	Positively
PDG Helicopters	Positively
Tresco Heliport	Positively
Penzance Heliport	Positively
Newquay Cornwall Airport	Positively
Fly Newquay	Positively
Cloud 9 Hang Gliding and Paragliding Association	Negatively if no Letter of Agreement is established
Cobham Aviation Services Ltd	Positively

4.5 The stakeholders, in Table 1 above, highlighted in green, all require technical aviation minded details of the proposals and have been informed and engaged as such so far. Those highlighted in orange have been identified as requiring further explanation of what is proposed and how it may, or may not as the case may be, affect them. Should they require more technical detailed information it will be made available to them through the various methods offered by Land’s End Airport. These methods are detailed in section 5 below. Those highlighted in yellow will be reminded, should the need arise, that a Letter of Agreement to operate within the LETC must be entered into with Land’s End Airport.

- 4.6 In order to reassure any stakeholder concerned with the environmental impact of any change we will emphasize that any change is not intended to increase aircraft numbers or alter current, well established aircraft tracks but rather a technical change to increase the safety standards for all users of the LETC.
- 4.7 The level of the change, as assigned by the CAA, means that we are not required to carry out a noise impact analysis, however, being an airport, Land's End is acutely aware of aviation noise and the impact it has on our neighbours and so we have looked closely at any changes to aircraft tracks and thus aircraft noise. We have concluded that as we are not intending to introduce more aircraft into the LETC and we are not intending to change aircraft routings that occur mostly over the open seas, there is no change to aviation noise impact on the environment.

In addition, we have taken direction from the ICCAN (Independent Commission on Civil Aviation Noise) website to ensure we follow their guidance.

## 5 Approach

- 5.1 Although all of the stakeholders from Stages 1 and 2 will be consulted with during stage 3 (minus those who have declined further contact), Land's End Airport will seek and hope to receive in-depth responses from the key stakeholders identified in 4.3 Table 1 above.
- 5.2 All stakeholders will be informed via email when the consultation is launched. They will be able to view and download the consultation document and all supporting documentation from the online consultation portal, Citizen Space. This is where they can also submit a response to the consultation. We have chosen the use of digital media as our primary source of informing stakeholders as we have email addresses of all our targeted stakeholders and because of social distancing and COVID-19 recommendations from the government and health officials, believe this to be the safest approach. Should any stakeholder require a paper copy of the consultation documents one will be made available.
- 5.3 Land's End Airport will also include a brief outline of the ACP on their website and include a link to the Citizen Space consultation portal.
- 5.4 Stakeholders needing a paper copy of the consultation material may write to the postal address enclosing a stamped self-addressed envelope. Respondents will then be able to submit a postal response to the consultation at the same address. The postal address is detailed in Appendix C of this strategy. Land's End Airport will not commit to respond to postal responses directly, however respondents are welcome to include a stamped envelope if they do require a reply. The consultation postal address will be available online and within the consultation document.

- 5.5 The mid-point for the consultation will be 5 weeks after the email launch and at this point, we will consider the responses received so far and actively request a progress update, via email, from those remaining stakeholders identified in 4.3 Table 1.
- 5.6 Before the final week of the consultation we will send a final reminder, via email, of the closing date and request a response from stakeholders who have not done so already. This will be backed up with a phone call to any stakeholder identified in 4.3 Table 1, in order to achieve maximum participation especially from key stakeholders.
- 5.7 Even though Citizen Space allows for the sponsor to moderate responses, Land's End Airport will not carry this out as it is the sole responsibility of the CAA, therefore all responses will be moderated solely by the CAA. Should responses contain requests for clarification, a list of FAQs would be added to the consultation website.
- 5.8 At the end of the 10-week consultation period all the responses will be analysed, any responses received after this date may not be included in the analysis.
- 5.9 Land's End Airport will acknowledge all responses received by sending a message back to the user using the email address provided by them.
- 5.10 In the event of any unexpected challenges or events, Land's End Airport will communicate directly with stakeholders in order to resolve such an issue and reach a mutual agreement. Due to the current COVID-19 restrictions on social distancing, communication will take place via email and telephone. If a mutual agreement cannot be reached this will be communicated to the CAA and advice and guidance sought for resolution.
- 5.11 If a request for extension to the consultation period is received, Land's End Airport shall consider the appropriateness of the request and if necessary, seek advice and guidance from the CAA.

## **6 Materials**

- 6.1 All data used in the materials made available during the consultation will be accurately annotated as to their source and validity periods.
- 6.2 Although many of our stakeholders are considered to be well versed in aviation matters there are also many that are not and so we plan to issue the main consultation document in plain English. A PowerPoint slideshow will be created with full information on the proposed changes and then summarising the main points, impacts and benefits of each.
- 6.3 We plan to mainly conduct the consultation via the internet (email and Citizen Space consultation portal) however respondents will also be able to submit a postal response. Any specific questions will be answered directly, and any FAQs will also be made available on Citizen Space.

- 6.4 Citizen Space will include an overview of the proposed changes, the consultation documents in plain and aviation technical English, available for download, and a survey which will allow users to submit feedback.
- 6.5 The feedback survey will include questions that focus on the scope of the proposal and allow users to submit additional comments. Information will be captured regarding the user; some of which is mandatory such as name and organisation being represented.
- 6.6 The consultation documents, that will be available on Citizen Space, will contain information on the current LETC, the proposed change options along with expected benefits and impacts for each. It will allow stakeholders to provide an informed opinion on the available options.
- 6.7 We will also include any FAQs on Citizen Space, received during consultation, to ensure that all stakeholders have sight of these.
- 6.8 The Stage 3 Options Appraisal (Full) document contains full details of benefits and impacts relating to the change options. No analysis relating to noise or local air quality has been completed because of the scaling of this proposal as detailed in 1.6.

## 7 Length

- 7.1 The timeline for this proposed airspace change has been projected forward to be implemented in time for the AIP/AIRAC cycle 09/2021.
- 7.2 Land's End Airport are proposing to use a 10-week consultation period for this ACP which will start on Monday 4<sup>th</sup> January 2021 and end on Monday 15<sup>th</sup> March 2021.
- 7.3 Land's End Airport contends that a 10-week consultation period will be sufficient for this project for the following reasons
- The ACP is a relatively limited change and is primarily technical in nature. Any size/volume change to the airspace will be out over the sea where it will have a negligible effect
  - We have a group of well-informed stakeholders who are fully engaged in the process
  - Stakeholders have responded in a very timely manner since the inception of this ACP and we expect this to continue
  - We will have a detailed plan within our consultation process that includes reminders as laid out in 5.5 and 5.6

## 8 Reversion Statement

- 8.1 After the full consultation process and selection of one of the proposed change options has taken place, should the proposal be approved and implemented, it would be possible to revert to the pre-implementation state, however this would greatly affect the ATC operations of all of the ANSPs within the LETC.
- 8.2 In the unlikely event that there are unexpected issues caused by the implementation of this proposal then short notice changes could be made via NOTAM.
- 8.3 All the ANSP and air traffic service providers affected would then, in consultation with the CAA, carefully consider the next steps and future of the LETC airspace.
- 8.4 After the closure of the consultation period, a feedback document will summarise the themes and Land's End Airport's response to issues raised. This document will be made available for download within 2 weeks of the consultation period ending.

## 9 Conclusion and Next Steps

- 9.1 There are four change options being proposed for this airspace design as detailed above in 3.8.
- 9.2 Land's End Airport's preferred option is for a Combined RMZ/TMZ and to alter the size or the LETC to include the IAP's at Land's End and St Mary's airports.
- 9.3 Full descriptions of all the options and how the preferred option was decided upon can be found in the documentation published on the CAA Airspace Portal website.
- 9.4 All responses will be analysed, with any common themes extracted and summarized. We will monitor the consultation portal and will formally respond back to any queries, uploading FAQs if necessary.
- 9.5 All online responses go direct to the CAA who will moderate submissions. Responses will be publicly visible by being published on the CAA website. Respondents will have the option to anonymise their online response so it is not publicly visible, but they cannot be anonymous to us or the CAA.
- 9.6 Postal responses will be scanned, redacted and uploaded to the CAA website.
- 9.7 All responses will be visible to us and the CAA.
- 9.8 Land's End Airport will then consider all of the responses received, identify any changes, update the options appraisal and then submit these to the CAA for review and then formally submit the airspace change proposal to the CAA.
- 9.9 We consider this strategy to be reasonable and proportionate to the scale of the change proposal.

# Appendix A

Land's End Airport Ltd

CHART SHOWING THE CURRENT LETC



AIRAC AD 2-EGHC-3-1 Land's End Transit Corridor

# Appendix B

Land's End Airport Ltd

List of Targeted Stakeholders in Stages 1, 2 & 3

**Stakeholders marked in red strikethrough were included in Stages 1 & 2 but have requested not to be included in stage 3 so will not be contacted further**

Key Stakeholders
RNAS Culdrose
Sloane Helicopters
Environment Agency
Natural England
St Mary's Airport
Isles of Scilly Skybus
Perranporth Flying Club
PDG Helicopters
Tresco Heliport
Penzance Heliport
Newquay Cornwall Airport
Fly Newquay
Cloud 9 Hang Gliding and Paragliding Association
Cobham Aviation Services Ltd
Other Stakeholders
British Microlight Aircraft Association (BMAA)
St Just Town Council
Honourable Company of Air Pilots (HCAP)
Skybus Flight Safety Manager
<del>Cornwall Protection of Rural England CPRE</del>
Cornwall Council
National Trust
Duchy of Cornwall
Health Watch
Island Partnership
Derek Thomas MP
British Helicopter Association
<del>Airprox Board</del>
AOPA
Director of Aviation Affairs
Seahawk Gliding Club @ RNAS Culdrose
35 out of 39 NATMAC Organisations
Airlines UK

Airspace4All
Airport Operators Association – Neil Thompson
Airport Operators Association – Terry Marsden
Airfield Operators Group
Aircraft Owners and Pilots Association – George Done
Aircraft Owners and Pilots Association – Martin Robinson
Association of Remotely Piloted Aircraft Systems UK
Aviation Environment Federation
BAe Systems
British Airline Pilots Association – James Gaskell
British Airline Pilots Association – Mike Thrower
British Airline Pilots Association – Zoe Reeves
British Balloon and Airship Club
British Business and General Aviation Association
British Gliding Association
British Helicopter Association
British Hang Gliding and Paragliding Association
British Microlight Aircraft Association/general Aviation Safety Council
British Model Flying Association
British Parachute Association
General Aviation Alliance
Guild of Air Traffic Control Officers
Honourable Company of Air Pilots
Helicopter Club of Great Britain
Light Aircraft Association
Military Aviation Authority
Ministry of Defence – Defence Airspace and Air Traffic Management
NATS – Brendan Kelly
NATS – Paul Jones
Navy Command HQ
PPL/IR Europe – Group Mailbox
PPL/IR Europe – Timothy Nathan
UK Flight Safety Committee
United States Airforce Europe



# Appendix C

## POSTAL ADDRESS FOR PAPER COPIES OF THE CONSULTATION DOCUMENTS

Airport Manager  
2019 – 75 ACP  
Land's End Airport  
Kelynack  
St Just  
Penzance  
Cornwall  
TR19 7RL