

CAA Consultation Assessment

Title of airspace change proposal	Kemble RNAV Approaches
Change Sponsor	Kemble Air Services
Project Reference	ACP-2016-18
SARG Lead	██████████
Case study commencement date	29 July 2020
Case study report as at	4 September 2020

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 Lead it may be useful that each question is also highlighted accordingly to illustrate what is:

resolved YES not resolved PARTIALLY not compliant NO

Executive Summary

This regulatory assessment concerns the consultation undertaken by Kemble Air Services in support of their proposal to introduce RNAV approaches at Cotswold Airport (Runway 26 and Runway 08). This is a Level 1 airspace change proposal (ACP) under CAP 1616 as it has the potential to alter traffic patterns below 7,000ft with changes to the arrival routes at Cotswold Airport. This proposal aims to formalise activity that already takes place at the airport by implementing RNAV approaches to support existing in-scope arrivals (Corporate/business jets, Commercial helicopter operators and Commercial Air Transport).

The Sponsor completed an 8-week consultation aimed at aviation and non-aviation stakeholders which presented two design options. A total of 49 'formal responses', via the Airspace Change Portal (Citizen Space), were received and the overwhelming response was very supportive of the proposal to implement RNAV approaches, across all stakeholder groups. Only one consultee rejected the proposal whilst 3 consultees provided a neutral response (no opinion/do not know) although the associated text was supportive. The output from the consultation confirmed a marginal preference for Option 2 (straight in approach to Runway 08 and a T bar approach to Runway 26), whilst the majority of consultees had no preference and supported either option.

Analysis identified that only one response may impact the final proposal, a suggestion to increase the missed approach altitude from 2,300ft, considering the track miles of the circuit. This idea prompted a review of the missed approach altitude and to the Initial Approach Fix (IAF) altitude. The Sponsor has amended the final design to incorporate this response.

The fundamental principles of effective consultation are targeting the right audience, communicating in a way that suits them, and giving them the tools to make informative, valuable contributions to the proposal's development. I am satisfied that these principles have been applied by the Sponsor before, during and after the consultation. I am also satisfied that the Sponsor has conducted this consultation in accordance with the requirements of CAP 1616 and that they have demonstrated the Government's consultation principles and the Gunning Principles.

PART A – Summary of Airspace Change Process to date

A.1	Airspace Change Portal: https://airspacechange.caa.co.uk/PublicProposalArea?pid=19	
A.2	Stage 1 DEFINE Gateway	28/10/2018
A.2.1	The required documentation was presented on time and we were satisfied that the change sponsor had met the requirements of the Process up to that point. Progress to the next Step of the Process was therefore approved.	
A.3	Stage 2 DEVELOP & ASSESS Gateway	22/02/2019
A.2.1	The required documentation was presented on time and we were satisfied that the change sponsor had met the requirements of the Process up to that point. Progress to the next Step of the Process was therefore approved.	
A.3	Stage 3 CONSULT Gateway	31/01/2020
A.3.2	The required documentation was presented on time and we were satisfied that the change sponsor had met the requirements of the Process up to that point. Progress to the next Step of the Process was therefore approved.	
A.4	Stage 4 UPDATE & SUBMIT	17/07/2020
A.4.1	The change sponsor formally submitted their proposal, which included all of the required documentation.	

PART B – Consultation Assessment

B.1	AUDIENCE	
B.1.1	Did the consultation target the right audience?	YES
	Given the Level and scope of the ACP, whilst taking into consideration the stakeholders that are most likely to be affected by this change, the Sponsor targeted both aviation and non-aviation stakeholders. The Sponsor provided a list of targeted stakeholders that they consulted with in Annex A of their Step 4A 'Consultation Review Document'.	

	<p>All of the stakeholders who were engaged with during Stages 1-2 were targeted and asked to respond to the consultation. The targeted stakeholders list included:</p> <ul style="list-style-type: none"> • MoD • Gliding community • Local airfields/aerodromes (military and civil) • Parish, District, Borough and County Councils • Local aviation operators • Local MPs including the APPG-GA • NATMAC • Cotswold AONB <p>The consultation was not exclusive to the identified targeted stakeholders as any individual/organisation could submit a response.</p>
B.1.2	Please provide a summary of responses below
	<p>A total of 49 'formal responses' were received during the 8-week consultation via the Airspace Change Portal (Citizen Space). Whilst the vast majority of consultees responded via Citizen Space, a small minority opted to respond via email. There does, however, appear to be a slight discrepancy with the statistics presented by the Sponsor with regard to incoming email correspondence. Within Step 4A 'Consultation Review Document', the Sponsor states that <i>"three consultees chose to respond by email and did not wish to formally respond"</i>, yet within Step 3D 'Categorisation and Review of Consultation Response' document, it implies that there were four stakeholders who responded via email (BALPA, Lyneham Flying Club, Malmesbury Area Board and Cotswold AONB Board). However, within Step 4B 'Formal ACP Submission' (para 3.2), the Sponsor refers to <i>'five informal emails'</i>. From the raw email evidence supplied by the Sponsor, all either expressed support for the proposal or that the proposal was not considered to sufficiently impact their operations/remit to warrant of a formal response. Whilst these points are noted for the purpose of this assessment, this did not in any way undermine or affect the validity of the consultation exercise, but it does highlight inaccurate record keeping and a lack of attention to detail.</p> <p>Responses were received from a healthy balance of aviation stakeholders including local aviation operators, the GA community and NATMAC members. The consultation also attracted responses from non-aviation stakeholders, including local residents and at elected representative level (Parish, District, Borough and County Council), although no local MPs responded. In addition to providing a general narrative/summary of the responses received from the consultation feedback form on Citizen Space, the Sponsor has helpfully reproduced statistics data directly from Citizen Space (using screenshots) for key questions.</p>

	<p>Of the 49 'formal responses' received, 35 responded in the capacity as an individual and 14 responded on behalf of an organisation. More than half (31) of the responses received were from the GA and gliding community, including the British Microlight Aircraft Association (BMAA), General Aviation Alliance (GAA) and the British Gliding Association (BGA).</p> <p>The overwhelming response during consultation was very supportive of the Sponsor's proposal, across all stakeholder groups. Question 6 asked consultees for their opinion on the proposal to implement a GPS based Performance-based Navigation (PBN) approach to allow in-scope aircraft to follow and land at Cotswold Airport. From the 49 responses submitted via the Airspace Change Portal (Citizen Space), 45 consultees (92%) gave their 'support', one consultee (2%) rejected the proposal and three consultees (6%) provided a neutral response (no opinion/do not know) although the associated text was supportive. All 49 consultees who participated via the Airspace Change Portal (Citizen Space) provided a rationale for their choice of answer which helped the Sponsor when analysing consultee feedback. The single consultee who did not support the proposal highlighted safety and ATM concerns of an AFISO unit operating a PBN/GNSS approach.</p> <p>Question 7 asked consultees for their preference for either Option 1 and Option 2 or those who had no option preference. Option 1 (straight in approach to both runways) was preferred by 5 consultees (10%), whilst Option 2 (straight in approach to Runway 08 and a T bar approach to Runway 26) was preferred by 14 consultees (29%). The majority (27 consultees – 55%) had no preference and supported either option. Three consultees (6%) opted for 'neither option/not supported'.</p> <p>According to the Sponsor, analysis of consultee postcodes resulted in a wider engagement area than would be expected from the targeted list of stakeholders. This is a product of social media and online/offline GA magazine presence. It illustrated a good representation regionally and within the areas underneath the proposals flight tracks (albeit each pin is a single response, which in some cases accounted for a Council's response on behalf of their constituents). The plotted map presented in Step 4A 'Consultation Review Document' illustrates all consultation responses across the UK and within the local region.</p>		
B.2	APPROACH		
B.2.1	<table border="1"> <tr> <td data-bbox="338 1066 1771 1118">Did the change sponsor consult stakeholders in a suitable way?</td> <td data-bbox="1771 1066 1995 1118">YES</td> </tr> </table>	Did the change sponsor consult stakeholders in a suitable way?	YES
Did the change sponsor consult stakeholders in a suitable way?	YES		
	<p>The Sponsor ensured that all stakeholders were consulted in a suitable way which enabled them to respond effectively and in a timely manner. The Sponsor utilised the Airspace Change Portal (Citizen Space) functionality to consult with stakeholders and consequently their approach was aligned with the requirements of CAP 1616. For those without internet access, postal requests for printed copies of the consultation document were to be accommodated but it appears that the Sponsor did not receive any such requests as there were no postal responses received. The feedback form (a separate annex within the consultation document) could also be printed off, completed and posted to the Sponsor where it would be manually uploaded to the Airspace Change Portal (Citizen Space). Hard copies of the consultation document were also provided to the local Parish Councils and were available at an information stand/display point in the airport's AV8 restaurant.</p>		

	<p>It was important that the Sponsor allowed consultees the opportunity to respond offline as this conforms to 'best practice' consultation principles.</p>
<p>B.2.2</p>	<p>What steps did the change sponsor take to encourage stakeholders to engage in the consultation?</p>
	<p>The Sponsor participated across a variety of online/offline platforms to generate an appropriate level of participation and response. Whilst online channels (Portal, social media, GA magazines and the airport's website) were primarily employed as the main driving force to promote the consultation, offline channels were employed to target the local community and those without internet access.</p> <p>The Sponsor produced a Consultation Activity Log (published under Step 3D) to account for emails, meetings, social media announcements and other interactions with stakeholders. This activity log was kept for the duration of the consultation exercise (10 February to 6 April 2020) and provides a useful summary of key events, in chronological order, for both online and offline communications channels.</p> <p>The engagement activities conducted by the change sponsor during the 'DEFINE' and 'DEVELOP & ASSESS' stages of the Airspace Change Process helped to ensure that the targeted set of stakeholders, who would be affected by this change, were both prepared and informed.</p> <p>Online</p> <p>The Airspace Change Portal (Citizen Space) acted as the primary public source where stakeholders were able to view, download the consultation document along with supporting consultation materials and respond online.</p> <p>All targeted stakeholders were sent a notification email on 10 February 2020 informing them of the consultation launch. The email included a brief description of the proposal, the consultation start/end date and a link to the Airspace Change Portal (Citizen Space) where stakeholders could download the consultation materials and give their views via a short questionnaire. A reminder email was sent to all targeted stakeholders midway through the consultation on 9 March 2020. A further follow up email to those targeted stakeholders who had not yet responded was sent on 30 March 2020, reminding them they had one week remaining to respond. This has been verified as the Sponsor has provided the raw email correspondence as part of their Formal ACP Submission. A consultation document was provided as an electronic copy directly to the local Parish Councils, via the airport's Parish Council Liaison Committee Chair. The launch, and subsequent two reminder emails, were sent as originally planned in accordance with the consultation strategy.</p>

Social media announcements, via the airport's Facebook and Twitter accounts, were issued at the same time as the three emails detailed above. Each announcement provided an explanation of the proposal and a link to the Airspace Change Portal (Citizen Space). This targeted not only aviation stakeholders but also members of the local community who 'follow' the airport on social media. Annex F (Consultation Social Media Reach Analysis), of the Step 4A 'Consultation Review Document', provides an interesting insight and gives statistics on 'reach, reactions, comments and shares'. The initial post (10 February 2020) was locked/pinned as the top post on the airport's Facebook account to maintain visibility throughout the consultation period. Analysis for Facebook when the consultation closed on 6 April 2020 showed that 4,523 people viewed the posts, of which 145 users clicked the URL to the Airspace Change Portal (Citizen Space). Meanwhile, analysis for Twitter when the consultation closed had 2,567 'impressions' (times people saw this tweet), of which 98 users clicked the URL to the Airspace Change Portal (Citizen Space).

A short article promoting the consultation which signposted the reader to the Airspace Change Portal (Citizen Space) was published online on Flyer Forum (10 Feb 2020), Pilot magazine (10 Feb 2020) and in the Light Aircraft Association's (LAA) 'Light Aviation' magazine (March 2020 issue). This has been verified as the Sponsor has provided supporting evidence as part of their Formal ACP submission.

The airport's website hosted a webpage (www.cotswoldairport.com/gnss) dedicated to the ACP which signposted the reader to the Airspace Change Portal (Citizen Space).

Offline

Throughout the consultation period, a display board 'information point' was placed within the entrance to AV8, the airport's restaurant, and within Flying Operations to promote the consultation which provided guidance on how best to respond online, via the Airspace Change Portal (Citizen Space). Printed feedback response forms were also available for stakeholders without internet access. The AV8 restaurant is used by pilots and their passengers as well as members of the public.

A short article promoting the consultation which signposted the reader to the Airspace Change Portal (Citizen Space) was published within Flyer magazine (April 2020 issue), Pilot magazine (Spring 2020 issue) and the LAA's 'Light Aviation' magazine (March 2020 issue). This has been verified as the Sponsor has provided supporting evidence as part of their Formal ACP submission.

The consultation strategy explained how residents living under the final approach, who may not be connected to the internet, would be informed via their respective local Parish Council. The Sponsor's consultation appeared as an agenda item at the Kemble and Ewen Parish Council Meetings held on 14 February and 10 March 2020 respectively (verified by minutes published on Kemble and Ewen Parish Council website – airport is a standing item agenda). The Consultation Activity Log stated that leaflets were supplied to the Parish Council Chair, but the Sponsor has not provided a copy of the leaflet as supporting evidence as part of their Formal ACP Submission.

	<p>A meeting with the Parish Council representatives of the Airport Liaison Committee was held on 20 February 2020 where the Parish Councils were asked for their help in publicising the consultation as widely as possible. The meeting provided the opportunity for the Sponsor to discuss their consultation and signpost the Airspace Change Portal (Citizen Space). The Consultation Activity Log confirmed that meeting minutes were produced but the Sponsor has not provided a copy of these minutes as supporting evidence. A separate meeting was held with Crudwell Parish Council on 12 February 2020 who agreed to publish a weblink to the Airspace Change Portal (Citizen Space) in their magazine and on their website. The Sponsor has not provided copies of the articles that were published in Parish Council magazines to advertise the consultation.</p>	
B.2.3	<p>Was the change sponsor required to respond to any unexpected events and/or challenges?</p>	YES
	<p>The Sponsor's consultation strategy explained how they would respond to unexpected events and challenges, including escalation and extension plans. According to the Sponsor, the risk of their consultation failing was thought to be driven by two main factors. Firstly, a concern of receiving little or no responses led the Sponsor to issue three notification/reminder emails and to utilise online/offline communication channels (as detailed in B.2.2) to ensure sufficient levels of response. Secondly, the prospect of stakeholders expressing the need for additional time to consider the proposal. There is no evidence to suggest that any stakeholder expressed their concerns to either the Sponsor, or directly to the CAA, on the reduced consultation period or through an apparent lack of opportunity to respond.</p> <p>It should be noted that the last 3 weeks of the Sponsor's consultation exercise (approved at the January 2020 Gateway), which ran from 10 February to 6 April 2020, did overlap with COVID-19 lockdown restrictions. The consultation had been running for 5 weeks before the UK Government's decision to formally impose lockdown restrictions on 16 March 2020. Whilst the Sponsor makes a brief reference to COVID-19 in their Step 4A 'Consultation Review Document', they do not give any recognition or explanation as to how the pandemic affected their consultation activities and plans. For example, the airport's AV8 restaurant would have been forced to close on 16 March 2020 meaning that the information point/display board promoting the consultation was now redundant. A separate meeting was scheduled with Swindon Borough Council but delayed due to COVID-19, although this meeting was classified by the Sponsor as out-of-scope of this ACP as it was focussed towards mutual business development after the implementation of PBN approaches.</p>	
B.3	MATERIALS	
B.3.1	What materials were used by the change sponsor during the consultation?	
	<p>As documented above, the Sponsor utilised the Airspace Change Portal (Citizen Space) to create a related consultation site. The site included a narrative which provided an overview of the main aim/purpose of the consultation and articulated the scope of it. The consultation document itself was embedded on the site and available for download.</p>	

The 23-page consultation document included the following sections:

Introduction

Explained how the consultation forms part of the requirements of the CAP 1616 Airspace Change Process and provided general introductory remarks.

Consultation Scope

Explained that the scope of the consultation was limited to the proposed implementation of new PBN Instrument Approach Procedures to support existing arrivals for certain types of aircraft.

Background

Reiterated the aim of the proposal and the benefits that it could bring to the airport. It was highlighted that whilst ‘in-scope’ aircraft only comprise of 0.7% of Cotswold Airport’s annual movements, these aircraft have a disproportionate positive economic effect, generating around one third of Cotswold Airport’s revenue based on 2019 financial data.

What is a PBN Approach?

Explained how PBN approaches uses GPS information, derived from navigation satellites, to allow an aircraft to fly a pre-determined Instrument Approach Procedure that is defined by a series of way points. This was supported with an illustration of a generic PBN approach.

The Local Context

Provided an overview of Cotswold Airport with regard to geography, the local community, the airport’s history, aircraft movements per annum and a summary of the different operations conducted. This was supported with the use of a diagram which gave an example of the current ‘scatter effect’ taken from individual aircraft routes from a commercial radar tracking application. Stakeholders were provided with a map which gave the boundary of the Cotswold AONB in relation to the location of Cotswold Airport. The section also provided basic information on the current local airspace with details of nearby airfields and included a screenshot of a CAA 1:500,000 VFR Chart.

Current Operations

Provided a breakdown of aircraft movement statistics for 2018 and 2019 (in-scope vs out-of-scope) and included information on runway operations (easterly and westerly).

Drivers for Change

Explained the main aim of this proposal (to “*increase operational capacity for in-scope aircraft*”) and outlined the associated benefits (economic, environmental and operational safety).

	<p>Development of Solutions Explained how the Design Principles were developed and tested through engagement with aviation and non-aviation stakeholders and how the options had evolved as a result of their input. Stakeholders were reminded why the 'Do Nothing' option and Option 3 were both discounted during Stage 2 of CAP 1616.</p> <p>Proposed Options Considered (Option 1 and Option 2) Provided a description of both options with the use of diagrams.</p> <p>Effect of Proposed Options Explained the anticipated impacts on aviation stakeholders, the local community, the environment and economic impacts.</p> <p>Consultation Process Provided stakeholders with the consultation start/end dates. Explained how stakeholders could participate and respond via the Airspace Change Portal (Citizen Space) as the preferred method or via post. The Sponsor provided a '<i>what happens next?</i>' section to help stakeholders understand the process.</p> <p>Annex A - Consultation Feedback Form (for stakeholders with no internet access) The feedback form contained eight questions in total, five of which related to the respondent's personal information. Two questions were specifically related to the actual proposal and were easy to understand and answer (tick box and free text box available). The last question allowed the respondent to provide any additional comments to the Sponsor.</p> <p>Annex B – Charts illustrating Option 1 and Option 2.</p>	
B.3.2	Did the materials provide stakeholders with enough information to ensure that they understood the issue(s) and potential impact(s) on them?	YES
	<p>The Sponsor set out their rationale for pursuing an ACP in their consultation document. Stakeholders were provided with sufficient information to help them understand the current situation and determine what the likely impact of the proposal would be on them, if it was approved and implemented. The Sponsor stated that their consultation document "<i>has been written in 'plain English' so that readers with no technical aviation knowledge can understand the information presented to them</i>". Whilst the Sponsor made efforts throughout their materials to write in 'plain English', there was a blend of technical and non-technical language as opposed to having a separate section dedicated to those with no technical aviation knowledge. That being said, the Sponsor made a reasonable effort at explaining the options, including their benefits and disbenefits, in a way that could be understood by non-technical individuals, although the layout of the consultation materials and the descriptions of some aspects could have been simplified.</p>	

B.4	LENGTH	
B.4.1	Please confirm the start/end dates and the duration of the consultation below	
	Start date: Monday 10 February 2020 End date: Monday 6 April 2020 Duration: 8 weeks	
B.4.2	If duration was less than 12 weeks, what was the justification?	YES
	<p>Whilst acknowledging that the accepted standard for consultation is 12-weeks, the Sponsor pursued an 8-week consultation and presented the following rationale in their consultation strategy:</p> <p><i>“Cotswold Airport believes that most people likely to respond to a formal consultation request have been identified through engagement and pre-existing contacts. Due to the relatively small local populations, the level of engagement thus far, the small size and assessed impact of this proposals, we have opted to reduce the consultation period from the 12 weeks recommended in CAP 1616 to a scaled and proportionate 8-week period, commencing Monday 10 February 2020 and closing Monday 6 April 2020 and prior to the Easter Holidays (Starting on Good Friday 10 April 2020). To help ensure this length of consultation is appropriate a targeted communications plan will run contemporaneously encouraging stakeholders to respond as quickly as possible. A reminder will be sent out 30 days before the deadline and a final reminder 1 week prior to the consultation closing. The possibility of issues arising which may force an extension has been acknowledged. Should this occur, accounting for the Easter break will add additional extra time”.</i></p> <p>The Sponsor also provided a standalone justification by email, ahead of the Stage 3 ‘CONSULT’ Gateway.</p>	
B.4.3	Was the period of consultation proportionate?	YES
	<p>The CAA considered at the Stage 3 ‘CONSULT’ Gateway that an 8-week consultation was entirely appropriate and proportionate for the level and impact of the change. The CAA was prepared to exercise some flexibility and in this instance were happy to accept the rationale provided by the Sponsor. As previously stated, there is no evidence to suggest that any stakeholder expressed concerns to the Sponsor, or directly to the CAA, on the reduced consultation period or through an apparent lack of opportunity to respond. Stakeholders were responding from an informed position based on engagement undertaken at Stage 1 and Stage 2 of CAP 1616. This is also likely to be a valid reason for some stakeholders not feeling the need to formally respond to the consultation.</p>	

B.5	GENERAL	
B.5.1	Was the conduct of the consultation aligned with the consultation strategy?	Yes
	The consultation was aligned with the consultation strategy that was approved at the Stage 3 'CONSULT' Gateway. The consultation was launched on time, notifications/reminders emails were issued as scheduled and the communication channels employed (online/offline) appear to have been executed as planned. That being said, the Sponsor has not provided a full suite of supporting evidence (see B.2.2 – leaflet and articles published in Parish Council magazines not provided).	
B.5.2	Has the change sponsor categorised the responses in accordance with CAP 1616?	YES
	Within the Step 3D 'Collate and Review Responses' document, the Sponsor has categorised the responses in accordance with CAP 1616 (see Appendix C, Table C2). The CAA has reviewed the consultation responses and accepts that the Sponsor has completed a fair, transparent and comprehensive review and categorisation of consultation responses; this exercise was completed on 2 June 2020.	
B.5.3	Has the change sponsor correctly identified all of the issues raised during the consultation and accurately captured them in the consultation feedback report?	YES
	After reviewing the raw consultation responses (downloaded from Citizen Space), the CAA is satisfied that the Sponsor has accurately identified and transposed the key themes, issues and concerns raised by the consultees in the Step 4A 'Consultation Review Report' (para 10-18).	
B.5.4	Does the consultation feedback report detail the change sponsor's response to the identified issues?	YES
	<p>The Sponsor deemed that only one response may impact the final proposed design. This was a suggestion to increase the missed approach altitude from 2,300ft, considering the track miles of the circuit. This idea prompted a review of the missed approach altitude and to the IAF altitude. The Sponsor has amended the final design to incorporate this response.</p> <p>The following responses were identified as containing useful and relevant comments but were not considered to have the potential to impact the final proposed design:</p> <p>GNSS Outage: The comment on reversionary mode is noted and will be included in the Final Appraisal and Safety Case. In this instance, the failure of GNSS Signal in Space (SiS), would be one of the factors that would temporarily suspend the use of the procedure until the SiS can be verified, defaulting back to the current operations of pilots self-defined routings. The APDO is providing a GNSS monitoring station, which has been gathering SiS data for the past 16 months.</p>	

	<p>Data has shown a consistent 98.8% performance for both APV-I and LPV-200. Although a reversionary mode is required, according to the Sponsor, they assess the risk of this as very low to minimal, based on the data and analysis on GNSS performance. This response was assessed as not impacting the final design because it is known information.”</p> <p>“BGA/GAA response: Although accessibility for all GA airspace users was identified as a key theme and surfaced in 10 other consultee responses, the Sponsor explained that this specific issue falls out of scope for this ACP. However, the issue of GA accessibility is recognised by the Sponsor and will be considered in the Post-implementation Review (Stage 7). The two highlighted concerns regarding South Cerney airfield and the temporary Class D airspace to safeguard royal flights were noted but both issues fall out of scope. The Sponsor stated how they have previously highlighted the South Cerney/artificial choke point concern to the CAA, in both direct interaction and within the Bowtie and safety arguments.”</p> <p>“MoD response: The specific detail contained within the MoD’s response is known and already the subject of either, the extant Letter of Agreement (LoA), or previously identified within the Bowtie and is noted for refinement of the LoA before submission of the proposal. The comment regarding consideration of the Brize Norton ACP was noted but it was explained that the final shape and size of the airspace is yet to be approved by the CAA. Whilst acknowledging the ongoing Brize Norton ACP, it is not unreasonable to suggest that integration of current and planned operations within uncontrolled airspace is an issue that the MoD’s ACP will need to address, if it wishes to enlarge its own controlled airspace into areas where this activity already takes place.”</p> <p>The single consultee who did not support the proposal pointed to safety and ATM concerns of an AFISO unit operating a PBN/GNSS approach. The Sponsor cited the now withdrawn CAP1122 and explained that the consultee’s concerns have already been addressed within the Bowtie Safety Assessment Framework (included in the safety case as part of the Formal ACP submission). These comments, although useful, were not considered to impact the final proposal.</p>	
<p>B.5.5</p>	<p>Is the change sponsor’s response to the issues raised appropriate/adequate?</p>	<p>YES</p>
	<p>The Sponsor’s response to the issues raised by consultees is appropriate and adequate.</p>	
<p>B.5.6</p>	<p>Is the formal airspace change proposal aligned with the conclusions of the consultation feedback report?</p>	<p>YES</p>
	<p>The Formal ACP is aligned with the conclusions of the consultation feedback document. It confirms the output from the consultation in that the overwhelming response from consultees was very supportive of the proposal, across all stakeholder groups. The Executive Summary refers to the consultation statistics and explains how a minor design modification has been included. Paragraph 8.2.4 of the Formal ACP explains how consultees demonstrated a marginal preference for Option 2, although it was recognised that most simply supported the proposal without preference for Option 1 or Option 2.</p>	

	According to the Sponsor, following the Final Appraisal in Step 4A which considered the feedback from the consultation, the final design (Option 2 with minor design modification) is submitted because it best meets the Design Principles and takes account of consultation feedback. That being said, the Sponsor could have articulated this better in Step 4A 'Consultation Review Document' (Conclusion and next steps section) by explaining that the final design taken forward would be based on Option 2. Similarly, in the Formal ACP submission, the Sponsor could have explicitly stated in the Executive Summary that the final design is based on Option 2 with a minor design modification as a result of consultation feedback.	
B.6	RECOMMENDATIONS/CONDITIONS/PIR DATA REQUIREMENTS	
B.6.1	Are there any Recommendations which the change sponsor <u>should try</u> to address either before or after implementation (if approved)? If yes, please list them below.	YES
	Not applicable in this instance.	
B.6.2	Are there any Condition(s) which the change sponsor <u>must fulfil</u> either before or after implementation (if approved)? If yes, please list them below.	N/A
	Not applicable in this instance.	
B.6.3	Are there any specific requirements in terms of the data to be collected by the change sponsor for the Post Implementation Review (if approved)? If yes, please list them below.	YES
	<p><u>STAKEHOLDER OBSERVATIONS</u></p> <p>The change sponsor is required to collate related stakeholder observations (enquiry/complaint data) and present it to the CAA. Any location/area from where more than 10 individuals have made enquiries/complaints must be plotted on separate maps displaying a representative sample of:</p> <ul style="list-style-type: none"> aircraft track data plots; and traffic density plots <p>The plots should include a typical days-worth of movements from the last month of each standard calendar quarter (March, June, September, December) from each of the years directly preceding and following implementation of the airspace change proposal.</p>	

PART C – Consultation Assessment Conclusion(s)

<p>C.1</p>	<p>Does the consultation meet the CAA’s regulatory requirements, the Government’s guidance principles for consultation and the Secretary of State’s Air Navigation Guidance?</p>	<p>YES</p>
<p>The fundamental principles of effective consultation are targeting the right audience, communicating in a way that suits them, and giving them the tools to make informative, valuable contributions to the proposals development. I am satisfied that these principles have been applied by the change sponsor before, during and after the consultation. I am also satisfied that the change sponsor has conducted this consultation in accordance with the requirements of CAP 1616 and that they have demonstrated the Government’s consultation principles, the Gunning principles and that the consultation has:</p> <ul style="list-style-type: none"> • Taken place when the proposal was at a formative stage – Within their consultation document, the Sponsor presented Option 1 and Option 2 and provided a brief background as to why a ‘Do Nothing’ option was discounted. Stakeholders were also informed why Option 3 (T bar join to both runways) was discounted as a result of engagement and mutual design work in Stages 1 & 2 of the CAP 1616 Process. The Sponsor’s consultation materials suggested that they were open minded and willing to be influenced by feedback and make modifications to their proposals. • Presented the consultation material clearly and outlined the potential impacts that needed to be considered – evidenced by the Airspace Change Portal (Citizen Space) consultation webpage and the 23-page consultation document which explained the purpose and scope of the consultation, the current situation/environment and outlined the benefits/disbenefits of both options in a way that could be understood by all stakeholders (aviation and non-aviation). As previously stated, whilst the layout of the consultation materials and the descriptions of some aspects could have been simplified, it allowed consultees to make informed decisions and give meaningful responses based on the material that they were presented with. • Provided a sufficient timeframe to allow considered responses – evidenced by an 8-week consultation which was entirely appropriate and proportionate for the scale and impact of the proposal. The engagement activities conducted by the Sponsor during the ‘DEFINE’ and ‘DEVELOP & ASSESS’ stages of the Airspace Change Process helped to ensure that stakeholders were both prepared and informed. The CAA was prepared to exercise some flexibility and were happy to accept the rationale provided by the Sponsor to hold an 8-week consultation. There is no evidence to suggest that any stakeholder expressed concerns to either the Sponsor, or directly to the CAA, on the reduced consultation period or from an apparent lack of opportunity to respond. 		

- **Taken into account the product of the consultation** – evidenced by taking forward Option 2 as the final design (with a minor modification) as a result of consultee feedback. The Sponsor has considered important points made by consultees (see B.5.4) which were identified as containing useful and relevant comments even though these did not lead to a modification of the final design. Only one response was identified as having the potential to impact the final proposal, a suggestion to increase the missed approach altitude from 2,300ft, considering the track miles of the circuit. This idea prompted a review of the missed approach altitude and to the IAF altitude. The Sponsor subsequently amended the final design to incorporate this response. The issues raised by the sole consultee who rejected the proposal have also been addressed appropriately and fairly.

PART D – Consultation Assessment Approval

	Name	Signature	Date
Consultation assessment completed by (Airspace Regulator – Engagement and Consultation)	[REDACTED]	[REDACTED]	04/09/2020
Consultation assessment approved by (Manager Airspace Regulation)	[REDACTED]	[REDACTED]	23/10/2020

PART E – Head of Airspace, ATM and Aerodromes – Comment/Approval

Name	Signature	Date
[REDACTED]	[REDACTED]	28/10/2020