Proposed changes to

London Luton Airport Arrivals

Consultation Feedback Report – CAP1616 Step 3D

Collate and Review Responses

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NATS-LLA Public

Roles

Action	Role	Date
Produced	**Airspace Change Expert** NATS Airspace and Future Operations	10/06/2021
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Issue	Month/Year	Changes this issue
Issue 1.0	06/21	Published to CAA Portal

References

Ref No	Description	Hyperlinks
1	SAIP AD6 CAA web page – progress through CAP1616	Link to CAA portal Link to consultation site
2	Stage 1 Statement of Need	Link to document
3	Stage 1 Assessment Meeting Minutes	Link to document
4	Stage 1 Design Principles	Link to document
5	Stage 2 Design Options	Link to document
6	Stage 2 Design Principle Evaluation	Link to document
7	Stage 2 Initial Options Appraisal and Safety Assessment	Link to document
8	Stage 3 Consultation Document	Link to document
9	Stage 3 Full Options Appraisal	Link to document
10	Stage 3 Consultation Strategy	Link to document
11	Airspace change: Guidance on the regulatory process for changing the notified airspace design and planned and permanent redistribution of air traffic, and on providing airspace information CAP1616	Link to document (Edition 4, March 2021)
12	Environmental requirements technical annex CAP1616A	Link to document
13	Definition of Overflight CAP1498	Link to document
14	Airspace Modernisation Strategy AMS CAP1711	Link to document
15	UK Government Department for Transport's 2017 Guidance to the CAA on its environmental objectives when carrying out its air navigation functions, and to the CAA and wider industry on airspace and noise management (abbreviated to ANG2017)	Link to document

Contents

1. Introduction

1.1. This public consultation was about a proposed change to the flightpaths of aircraft arriving at London Luton Airport (LLA). The proposal is sponsored jointly by NATS and LLA.

1.2. During periods where the workload of air traffic controllers is predicted to become too intense, safety dictates that temporary limits (known as flow restrictions) are applied to the numbers of aircraft that a controller can manage, before safe limits are exceeded. This causes delay to the travelling public (at both LLA and Stansted), and is a short-term, temporary solution to the underlying problem.

1.3. We have identified that, unless we do something now, the intensity of air traffic control workload in this region may become unsustainable for air traffic controllers in the longer term.

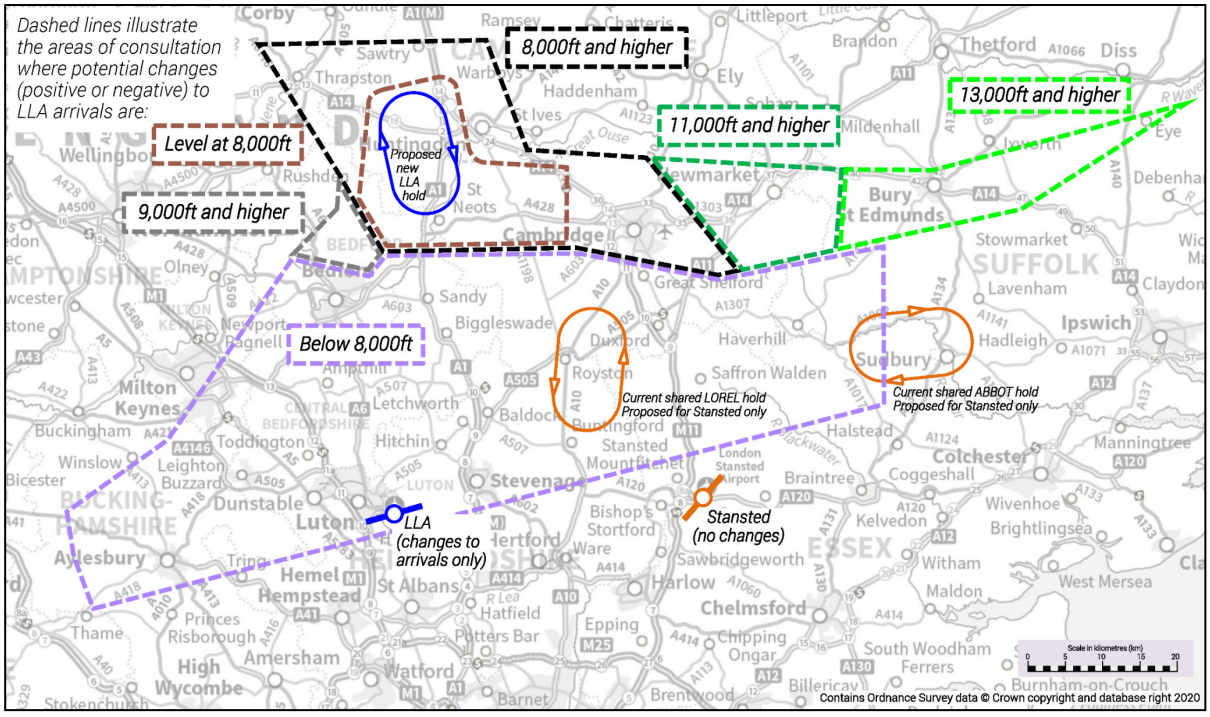


Figure 1 Consultation Areas

1.4. The coloured regions in Figure 1 above illustrate the scope of this consultation, at different altitudes. We propose to reduce complexity by moving LLA's arrival flightpaths (to a new holding pattern in blue), leaving Stansted's arrival flows unchanged (current shared holding patterns, in orange).

1.5. This would reduce air traffic controller workload because the arrival flows to each airport would be separated further out and higher up, assuring a safe and efficient operation for the future.

1.6. We are not proposing any change to the way aircraft depart from LLA, nor would there be changes to the way Stansted arrivals and departures fly under this proposal.

1.7. The foundation of a good consultation is adherence to the four 'Gunning Principles', long-established in the UK, which set out the legal expectations for what constitutes an appropriate consultation. They are integrated into the Civil Aviation Authority (CAA)'s airspace change process document CAP1616 (Ref 11).

1.8. The Gunning Principles are:

- Consultation should occur when proposals are at a formative stage
- Consultation should give sufficient reasons for any proposal to permit intelligent consideration
- Consultation should allow adequate time for consideration and response
- The product[1] of consultation must be conscientiously taken into account

1.9. The airspace consultation opened early morning of Monday 19th October 2020 and ended in the late evening of Friday 5th February 2021, a period of 15 weeks 5 days.

[1] The 'product' of consultation, in this context, is the summary of emerging themes extracted from the feedback analysis.

2. Where are we in the airspace change process?

2.1. This document is associated with Step 3D as per the airspace change process chart in Figure 2 below:

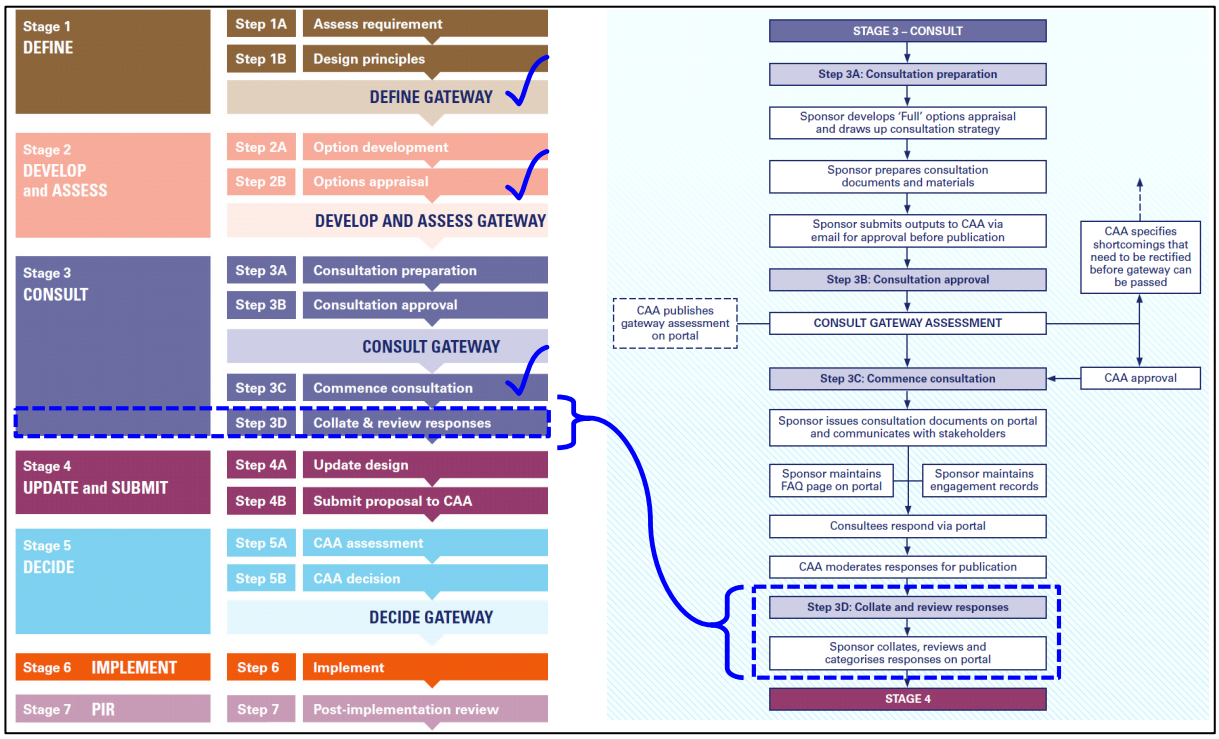


Figure 2 Airspace Change Process – Overview (left) and Stage 3 Consult (right)

Supporting documentation for all stages of this proposal (Stages 1, 2 and the first part of 3) can be found on the CAA's airspace change portal (see table of references).

2.2. The timeline for consultation activities is illustrated below, as per Consultation Strategy (Ref 10).

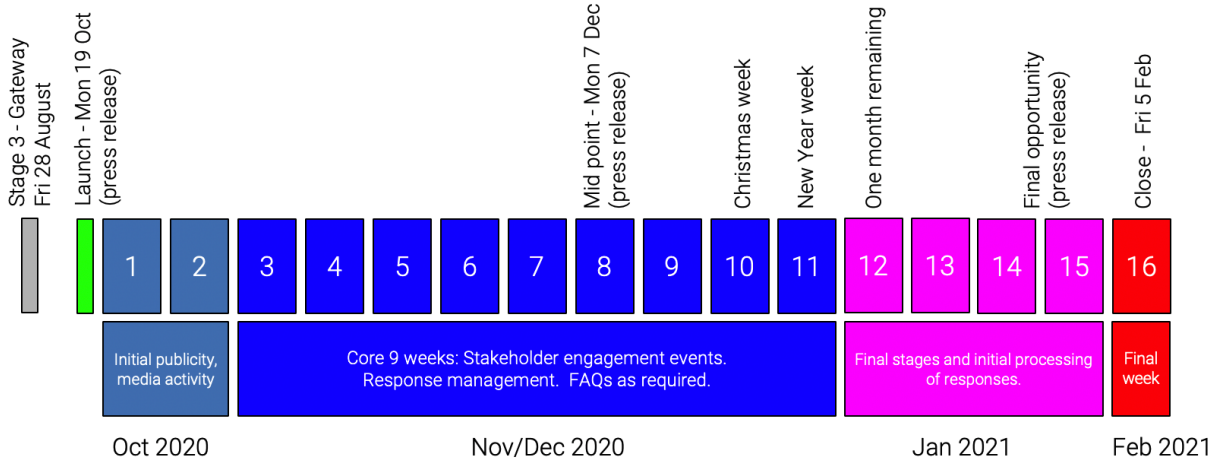


Figure 3 Overview of Stage 3 consultation activities, by week

3. What is this document?

3.1. The full consultation process accords with the simple concept 'we asked, you said, we did'.

3.2. The consultation itself was how 'we asked…'.

3.3. This document addresses 'you said…', meaning that we state facts and data about the consultation feedback, we draw inferences from the feedback analysis that may lead us to conclusions about the final product of this consultation, but do not yet decide how the feedback may influence the design of this airspace change proposal .

3.4. As per Step 3D in the Figure 2 flowchart above, it also provides a summary of how we conducted the consultation, and details on how we collated, reviewed, and categorised the responses.

3.5. There will be a second consultation report, Step 4A in the flowchart, detailing the 'we did…' part. That document will take into account the 'product' of consultation (see the fourth Gunning Principle in paragraph 1.8 above), including redesign suggestions, which will be considered and addressed, and any amendments to the design will be explained.

3.6. In this document Step 3D, we will provide analysis showing how responses were themed, how those themes were analysed, how that analysis identifies themes that 'may impact final proposals' and themes that 'do not impact final proposals'. The former will progress to the companion document, the second consultation feedback report known as Step 4A which will describe the changes made as a result of consultation feedback.

3.7. The airspace change process CAP1616 Table C2 describes how consultation responses should be generally categorised:

Table C2: Categorisation of consultation responses

	Type	Responses which may impact final proposals		Responses which do not impact final proposals
First feedback report Step 3D	Description	Responses which have been categorised as having the potential to impact on the proposal would include new information or ideas that the change sponsor believes could lead to an adaptation in a lead design option or a new design option.		The content of this response would not include new information or ideas that could lead to an adaptation in a lead design option or a new design option but may include other information that should be logged and considered. For example responses which criticise the consultation format should give sponsors insight to improve future engagement; sentiments identified around trust will help to identify areas where additional future engagement may improve relationships; and criticism of historic activity may help to avoid similar situations in future. The change sponsor must be able to show how it has heard, understood and classified responses which do not impact its final proposal, and set out clearly why.
Second feedback report Step 4A	Sub type	Responses which have impacted the final proposal	Responses which have not impacted the final proposal	
	Description	The change sponsor must show how the response has been acted on and what changes have occurred to their proposal.	The change sponsor must show why the response has not been acted on and explain why the proposal cannot be modified to meet the recommendation.	

Figure 4 Response categorisation: CAP1616 Edition 4 Table C2 p.185

4. What consultation activity was undertaken?

Our consultation was conducted in accordance with the Consultation Strategy document (Ref 10) which was approved by the CAA. For full details please refer to that document.

Annex A: Consultation Data and Evidence contains a summary of our communications and engagement exercises, including the following data:

- Outreach
- Media coverage
- Social media information
- Weekly response rate
- Digitally excluded/seldom heard
- Media campaigns at three significant milestones – launch, midpoint, and final opportunity.

We also emailed the stakeholders identified in the Consultation Strategy document (Ref 10) at these three significant moments.

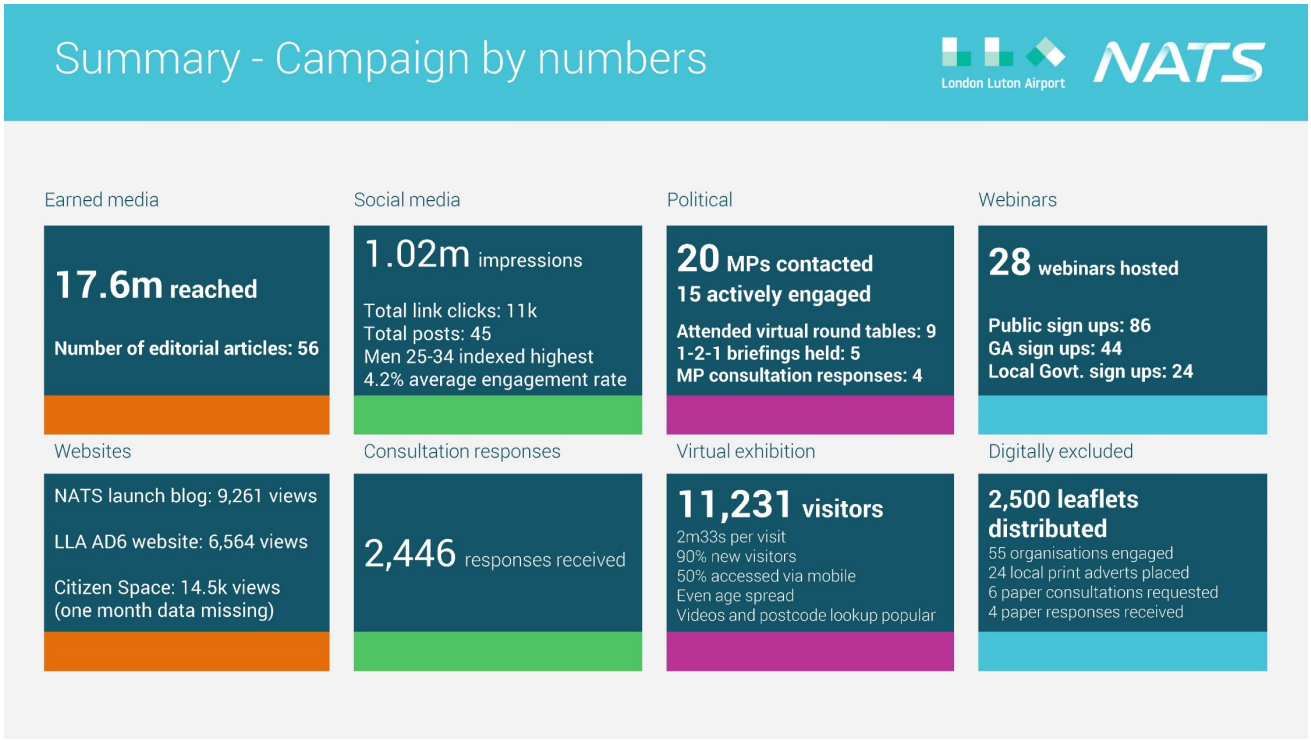


Figure 5 Summary of consultation campaign

The following paragraphs are examples and evidence of our consultation activities.

4.1. **CAA-Hosted Website:** The consultation website can be permanently found here: https://consultations.airspacechange.co.uk/london-luton-airport/ad6_luton_arrivals/

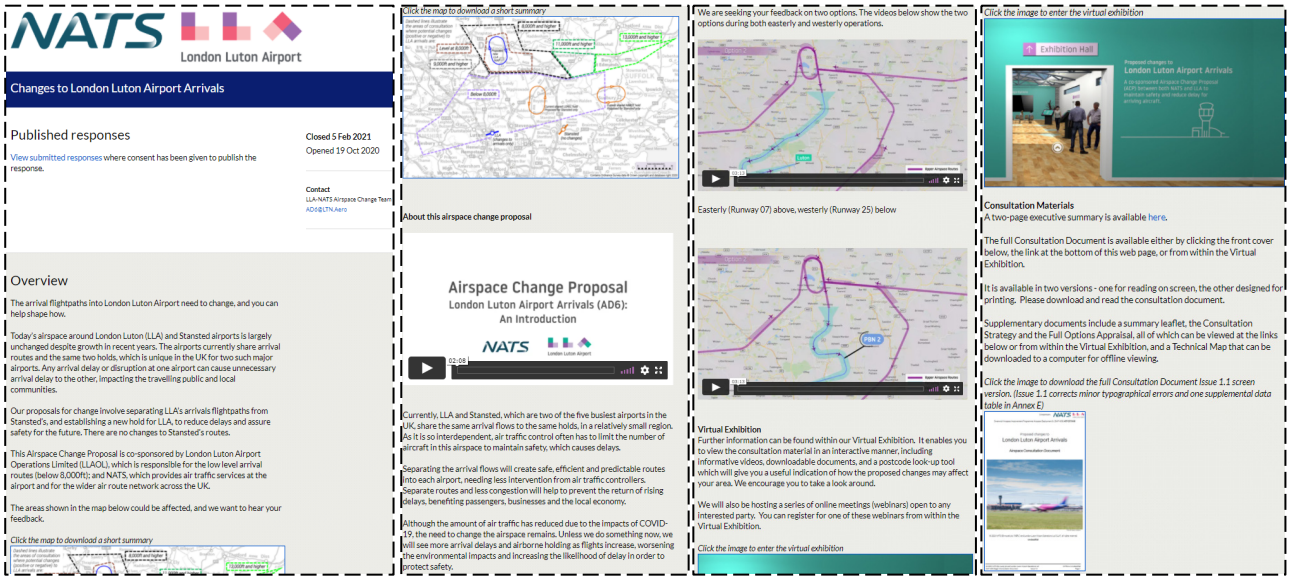


Figure 6 Example Screenshots of some of the Consultation Website

4.1.1. We did not have full access to the CAA's website statistics. The CAA did inform us that the consultation website had at least 14,500 views, with one month of data unavailable.

4.1.2. This website is a sub-area of the CAA's airspace change process portal, which can be found here: https://airspacechange.caa.co.uk/PublicProposalArea?pID=51

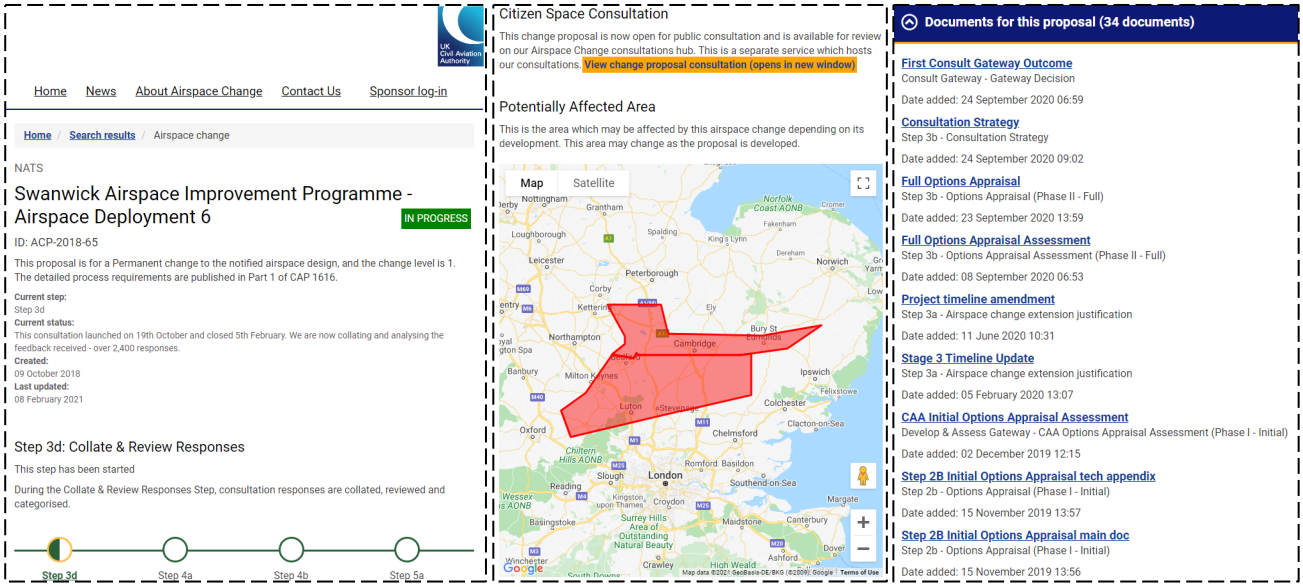


Figure 7 Example Screenshots of some of the CAA Airspace Change Portal for this proposal

4.1.3. The CAA's portal is considered to be a permanent, transparent record of all airspace change proposals.

4.2. **Virtual exhibition:** Our special website was a bespoke build for NATS-LLA and will remain 'live' until at least September 2023. The URL is https://www.nats.aero/vr/ad6/

Figure 8 Screenshot Examples from the Virtual Exhibition

4.2.1. The Virtual Exhibition statistics apply from consultation opening (19th Oct 2020) to closing (5th Feb 2021):

- 11,231 unique visitors, with 42,207 'room views'
- Average visit lasted 2min 33sec
- Total visiting time 23 days 20 hours 17 minutes 35 seconds
- Around 50% used a mobile device (smartphone, tablet) demonstrating that the virtual exhibition was accessible on smaller devices
- The age range 25-34 indexed the highest, with an even spread across age ranges including good results for ages 65+
- The postcode-checking tool was the most popular item, with over 18,800 look-ups performed over the course of the consultation.
- This link https://www.nats.aero/vr/ad6/content/postcode/sectormap/dist/ is a 'live' report on the total number of postcode enquiries, and shows the most frequently input postcode regions.

4.3. Video conferencing (webinars): Recordings of the public webinars are available within the virtual exhibition https://www.nats.aero/vr/ad6/ - please find them in the 'library' area (see Figure 8 above).

4.3.1. We hosted a series of online video meetings to give stakeholders the opportunity to engage as directly as possible with us. Video conferencing was the best way of achieving this, given the social distancing and travel constraints due to the COVID 19 pandemic. A 'stand' in the virtual exhibition website provided dates, times and registration details, and subsequently hosted video recordings of the presentations and Q&A sessions.

4.3.2. Initially we used the Microsoft 'Teams Live' broadcast platform as it is designed to host a large audience. However, it became apparent that a lot of people were using the virtual exhibition to self-brief and find their own answers to their questions and registration numbers for the video conferences meant the regular Microsoft 'Teams' interactive platform became more appropriate. The 5th and subsequent public webinars used 'Teams' which provided more flexibility for a smaller number of attendees to actively participate, on camera and on microphone, to ask questions and have a more direct dialogue with the hosts and experts.

4.3.3. We originally intended to hold at least 3 public video conference sessions, however we ultimately scheduled 10 dates. A total of 86 people registered for these sessions, with typically about half those registered actually attending and participating. Ultimately we held 9 full sessions – in the final (10th) session, none of those registered to attend actually joined the event within the first 15 minutes, thus the event was closed early.

4.3.4. An additional separate public session targeted the private pilot/general aviation community. 44 registered to attend, and there were 26 participants on the day.

4.3.5. During each public webinar, the presenters encouraged attendees to respond to the consultation, instead of attempting to record feedback on the participants' behalf.

4.3.6. For the avoidance of doubt, none of these webinars produced direct feedback to the consultation because their purpose was to answer participants' questions and to encourage them to submit a response. However, the sessions provided useful feedback to update the FAQs and to abridge the consultation document into a shorter format. It also resulted in an additional significant item displayed within the Virtual Exhibition (an infographic dedicated to detailing the proposed holding pattern) plus the additional upload of some noise technical data files suitable for use in geographic information systems such as Google Earth. See Section 5.9, from p.15, for details.

4.3.7. To ensure webinars were as accessible as possible we held them at different times of day, evenings, and at weekends.

4.3.8. We also received feedback that the recordings should be made available. Therefore we made recordings of each webinar, which were uploaded to the virtual exhibition for accessibility and for

reference. The recordings were viewed a total of 162 times. At the time of publishing, the public webinar recordings and updated FAQs can be found within the 'library' area of the Virtual Exhibition. See also paragraph 5.7 on p.14

4.3.9. We also held several closed webinars. Some - not all - of these webinars were recorded; those that were will be available to the CAA upon request, however they will not be published. The number of closed webinars we held are as follows:

- 9 MPs via virtual round-tables
- 5 briefings directly with MPs
- 5 local government briefings (from Parish through District to County Council), for officers and elected representatives.
- 6 briefings with general aviation (GA) stakeholders and experts in GA-specific fields
- 4 briefings and workshops with the Ministry of Defence
- 2 presentations to a wide group of air operators (airline forum and business jet forum) as part of the wider NATS customer engagements on airspace change
- 2 wider briefings with LLA aircraft operators, followed by 2 briefings with specific airlines
- 1 briefing with adjacent Stansted Airport

4.4. Social media: Links to the consultation website were included in sub-pages of our websites, including our social media platforms. They were coordinated and content was varied, with each organisation considering their different audiences. The statistics for organic posts are:

4.4.1. Facebook: 11 posts by NATS, 3 posts by LLA
- 72,900 impressions[2]
- 2,342 clicks

4.4.2. Twitter: 11 posts by NATS, 20 posts by LLA
- 193,000 impressions[2]
- 3,460 clicks

4.4.3. LinkedIn: 3 posts by NATS, 3 posts by LLA
- 30,600 impressions[2]
- 333 clicks

4.5. Traditional Media: We maintained consistent communications activity, including local newspaper articles and broadcast interviews, which helped raise awareness and directed stakeholders to the online consultation. Significant broadcast media, including BBC Look East and ITV Anglia, contributed to particularly wide reach across the consultation area over the launch period. Traditional media are likely to be more relevant to those considered 'digitally excluded' or 'seldom heard'. Statistics for the consultation for traditional media were:

4.5.1. Launch (19th October 2020)

- 10.5m reach
- 9 print and online publications, 1 aviation trade publication
- 25 broadcasts (tv interviews and spots, radio interviews and spots)

4.5.2. Midpoint (the week from 7th – 14th December 2020)

- 6.5m reach
- 11 print and online publications, 2 aviation trade publications
- 1 website broadcast (exclusive interview with the online side of a local newspaper)

[2] The count of social media 'impressions' is the number of times an instance of a post is on screen for the first time. Source https://www.facebook.com/business/help/675615482516035 (Twitter and LinkedIn have similar definitions)

4.5.3. Final opportunity (18th January 2021)

- 602,000 reach
- 5 print and online publications
- 2 broadcasts (radio spots)

4.5.4. Paid advertisements in 16 paper media (local newspapers/community magazines), reaching c.328,000

4.6. CAA Regulatory Liaison Meetings: In accordance with our Consultation Strategy (Ref 10), we held two CAA liaison meetings to discuss progress, consider if further guidance was needed, and to consider the effectiveness of the consultation and activities associated with the Strategy.

4.6.1. These meetings were held late November and mid-December. They were minuted, names redacted and uploaded to the consultation website:

- First liaison meeting 20th November 2020 (Link)
- Second liaison meeting 15th December 2020 (Link)

4.6.2. These two CAA liaison meetings provided assurance that the co-sponsors were taking reasonable steps to ensure the effectiveness of the consultation under unusual circumstances, updating the Regulator with progress on the Consultation Strategy (Ref 10).

5. How did our approach to consultation evolve?

We constantly monitored feedback to the reception, content, and presentation of the consultation material.

We considered on an ongoing basis how we could adapt and improve the materials, enhance the experience of the user, and how the video conferences could be adapted based on experience.

The following topics summarise these changes:

5.1. Virtual exhibition

We considered this to be a great success, with a large number of visitors (see paragraph 4.2.1 on p.10). It was an effective method of providing the user with the right level of detail according to their individual needs – the greater the detail sought, the further into the virtual exhibition the user could explore. The final option was to email us at the dedicated address, and we also encouraged registration to the video conference events where people could ask questions directly.

The virtual exhibition main layout remained unchanged with a minor mid-point refresh during the week from 7th – 14th December 2020. We also added individual elements and updated/populated others as described below. As per Section 4 above, all the virtual exhibition and consultation websites are still available to view and are planned to remain available for reference until at least September 2023.

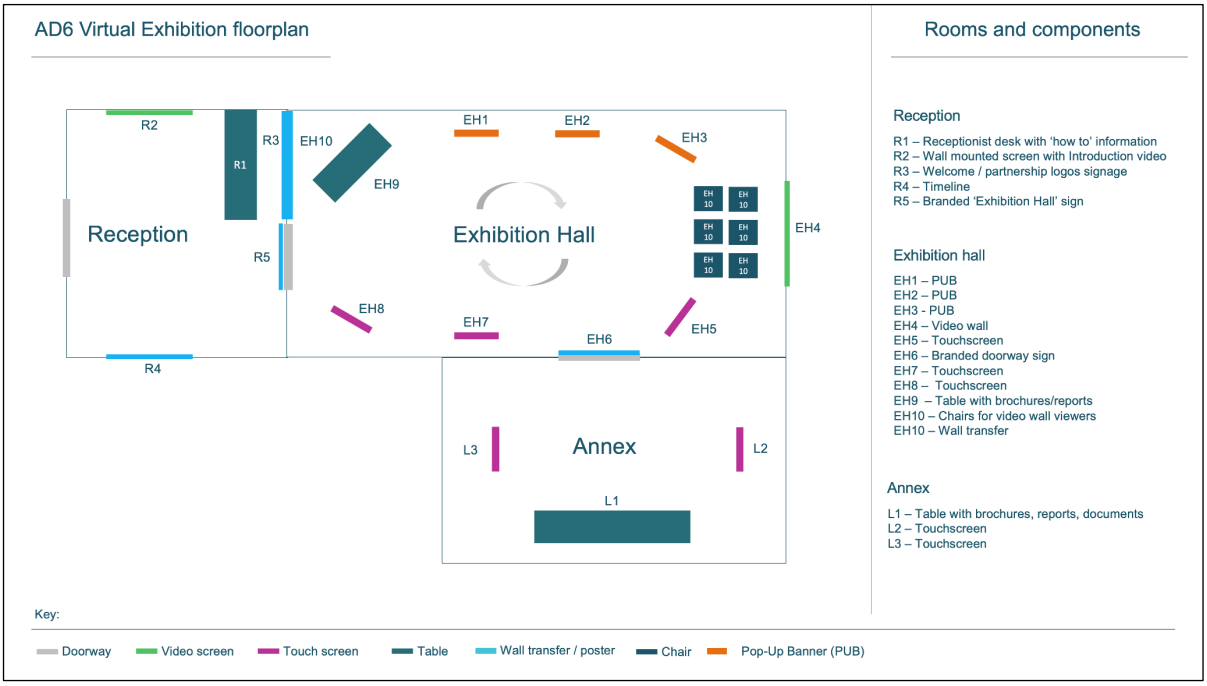


Figure 9 Virtual Exhibition Floorplan Construction

5.2. FAQs (within the library area of the virtual exhibition)

5.2.1. We pre-populated the FAQ section with more than 30 questions and answers, based on our experience with previous airspace consultations, and the topics we expected would benefit from an FAQ.

5.2.2. After several webinars, and emails to our dedicated email address, we added further FAQs, to make a final total of 57. Some were technical in nature, others concerned the airspace change process and engagement, several concerned the proposed holding pattern and the PBN routes. These FAQs remain available for reference within the library area of the virtual exhibition.

5.3. Postcode lookup tool

5.3.1. We found this tool to be the most popular element of the virtual exhibition.

5.3.2. Its purpose was to provide a basic illustration of the potential changes in impact for a given postcode, and to direct the user to the consultation document for them to explore potential impacts in more detail.

5.3.3. The tool was never intended to be a definitive, primary source of analysis for any given postcode.

5.3.4. We received feedback that some outputs of the tool overstated the likely impacts at some postcodes.

5.3.5. We needed to decide whether to attempt to refine the tool's results, thus changing the tool part way through the consultation, or to leave it unchanged.

5.3.6. We decided to refine the tool and its output wording. This work progressed behind the scenes in late November, and an updated tool was deployed to the virtual exhibition in mid-December.

5.3.7. We placed additional text in the output explaining that the tool had been updated, and that some previous users of the tool may get different results following the update, while referring all users to the consultation document for full details.

5.4. Consultation document – abridged version

5.4.1. During the first few weeks of the consultation, some stakeholders were concerned that the full consultation document was very long.

5.4.2. Changing a significant volume of airspace such as this is complex, and publishing the full unabridged information is necessary in order to be accurate, thorough, and transparent.

5.4.3. About five weeks into the consultation (late November 2020), we provided a shorter version. This explored the proposal's basic information and associated context, but removed some of the detail and data, reducing the total number of pages from 122 to 30. This abridged version was available for 10 weeks (approximately two thirds) of the consultation..

5.4.4. The full document remained available at all times as the 'master' source of data, should the reader wish to explore further.

5.5. Open Correspondence

5.5.1. On 20th November 2020 the MP for North East Bedfordshire, Richard Fuller, wrote an open letter to the Secretary of State for Transport regarding this proposal, to which we responded, offering a one-to-one briefing. That offer was accepted, and we met via video conference.

5.5.2. In the 'Library' area of the Virtual Exhibition, we created a sub-section of the Consultation Materials stand, in which this correspondence was placed. This allowed for the collation of further open letters from any source, providing a single transparent repository for them. Ultimately this turned out to be the only such correspondence.

5.6. Technical Map – layered PDF

5.6.1. The library contained a layered PDF map, which was accessible to all with a laptop/desktop computer (not suitable for smartphones or tablets).

5.6.2. This was an extremely useful tool for explaining, by switching map layers off and on, how the impacts on a village or town might change under this proposal.

5.6.3. The technical map was originally published without a scale. This was corrected, and an updated map was provided in late November 2020 that included scales in kilometres, statute miles and nautical miles.

5.7. Video Conferences

5.7.1. During the earliest video conference presentations there was a lot of interest in the choice of holding location; and requests to access recordings of the webinars.

5.7.2. We immediately updated the original presentation to include a new animated slide, summarising the existing surrounding airspace constraints. This demonstrated why the hold would need to be placed in the general location, which was illustrated within the consultation document and associated Stage 2 material (Ref 5).

5.7.3. This particular element of the presentation became an effective explanatory tool and was regularly referred to, in the live Q&A sessions.

5.7.4. We recorded all the presentations and those recordings are available, see paragraph 4.3.7 above.

5.8. Holding infographic

5.8.1. The holding location became the most common topic of interest throughout the consultation period. We decided to create an infographic to act as a stand-alone explanation why the hold needed to be in that general location, how high the hold would be, and how holds work in practice.

5.8.2. The infographic was ready for the mid-point press release (the week from 7th – 14th December 2020). It was added to one of the 'stands', position 8 in the virtual exhibition, and our launch stakeholders were informed of this infographic in the mid-point email campaign.

5.9. Noise contour and data files - KMZ

5.9.1. A small number of stakeholders told us they were having difficulties with some of the contour maps provided in the consultation document's Annexes D, E and F.

5.9.2. We received requests for either increased size, greater resolution, or for the contour files to be published so they could be examined more closely.

5.9.3. There was an expectation by the enquirers that the Geographical Information System (GIS) data would be easy for us to provide; however it proved more difficult than expected for our noise consultants to produce the data files, leading to a delay in their acquisition.

5.9.4. We published them in the library area of the virtual exhibition on 12th January 2021, using the commonly used & freely available Google Earth format known as KMZ. This allowed those with an interest in the raw geographical data to explore further, and to 'zoom in' on areas of interest.

5.10. Consultation document – erratum correction

5.10.1. On Friday 8th January 2021 a local council officer reported that they had identified an issue with the consultation document. It concerned one of the supplemental data tables in one of the data annexes, on page E-10:

- The supplemental data table in question was an unintended duplicate of one of the 47 other data tables, split into 24 daytime and 24 night-time – the correct table was omitted.

5.10.2. We immediately took preparatory action as follows:

- Confirmed that no other data tables/contour maps etc were affected
- Confirmed that this was a documentation preparation error (essentially a copy/paste error of the data table) and was not reflected in the formal analysis calculations, which used the correct raw data files
- Confirmed that the data table was a supplemental metric for additional context. The unaffected main body of the consultation document, maps and data would be the primary method for explaining how the airspace change impacts could change. Stakeholders could use the primary information to ascertain those changing impacts with full context and without needing to refer to the supplemental data
- Confirmed that the only document affected was the full consultation document – the abridged document did not contain the data tables
- Identified two separate, minor, typographical errors that could be corrected at the same time

- Replaced the supplemental data table on p. E-10 with the correct table, N65 daytime population and household counts for CAP1498 48.5° overflight (Ref 13) – N65 overflight is described in CAP1616A (Ref 12) and the Air Navigation Guidance 2017 (abbreviated as ANG, Ref 15) as a supplementary data metric, with LAeq as the primary metric
- Updated the consultation document ready for publication, all changes highlighted with a bright cyan background, and an update to the publication history (and page footers) from Issue 1.0 to Issue 1.1, ensuring the correction and associated highlighting was explained transparently

5.10.3. We contacted the CAA to explain the situation and agreed the following course of action to ensure we remained within the scope of the airspace change process CAP1616 (Ref 11):

- The consultation document issue 1.0 would be removed from all websites and replaced with issue 1.1. (Replacing the document, rather than simply providing an additional document, would ensure visitors to the websites would only be able to access the corrected version from that point on; we agreed it was better to not have the original document remain available in order to avoid confusion.)
- The stakeholders identified in the Consultation Strategy document (Ref 10) would be informed, also anyone requesting a paper copy.

5.10.4. The documentation corrective actions were completed within five working days, with the updated consultation document issue 1.1 live on all websites Friday 15th January 2021.

- The list of stakeholders as detailed in Annex A of the Consultation Strategy document (Ref 10) were sent an email with explanatory text the following Tuesday 19th, a link to the updated issue 1.1, and a reminder of the closing date – this was part of the 'last chance to respond' hastening campaign
- Those who were sent a paper copy of the consultation document were sent a covering letter and a replacement page E-10 by post

5.10.5. We contend that the actions taken, with the CAA's agreement, were proportional, appropriate, and remain within the airspace change process.

6. What questions did we ask?

6.1. This section lists the questions asked, as per the Consultation Document (Ref 8).
This was designed to be printable should anyone wish to send a paper response.
The online questionnaire asked the same questions in a similar format.

6.2. The first questions were about the respondent themselves, with the core ten questions asking opinions on aspects of the proposal for each airspace option, and for each runway.

6.2.1. Each question had multiple choice buttons (known as 'closed questions'), and also had a text box area, inviting the respondent to explain their answers (known as 'open questions').

6.2.2. This combination of 'closed' with 'open' questions is consistent with the advice supplied in the consultation toolkit by the Independent Commission on Civil Aviation Noise (ICCAN).

6.3. The questionnaire was as follows:

If you wish your response to be published anonymously, your personal details (name, postcode, email) will be redacted and only be seen by LLA, NATS and the CAA

☐ YES, I want my response to be published with my details
☐ NO, I want my response to be published anonymously

Name: _____

Representing (Self or an Organisation): _____

Postcode: _____

Email: _____

Question 1

To what extent do you agree that Option 1 is an acceptable solution for Runway 07 (easterly)?
☐ Strongly agree ☐ Agree ☐ Neither agree nor disagree ☐ Disagree ☐ Strongly Disagree
Tick **one** box above, and add your reason for your answer below if you wish:

_____

_____

_____

_____

Question 2

To what extent do you agree that Option 1 is an acceptable solution for Runway 25 (westerly)?

☐ Strongly agree ☐ Agree ☐ Neither agree nor disagree ☐ Disagree ☐ Strongly Disagree
Tick **one** box above, and add your reason for your answer below if you wish:

_____

_____

_____

_____

Question 3

To what extent do you agree that Option 2 is an acceptable solution for Runway 07 (easterly)?

☐ Strongly agree ☐ Agree ☐ Neither agree nor disagree ☐ Disagree ☐ Strongly Disagree
Tick **one** box above, and add your reason for your answer below if you wish:

_____

_____

_____

_____

Question 4

To what extent do you agree that Option 2 is an acceptable solution for Runway 25 (westerly)?

☐ Strongly agree ☐ Agree ☐ Neither agree nor disagree ☐ Disagree ☐ Strongly Disagree
Tick **one** box above, and add your reason for your answer below if you wish:

_____

_____

_____

_____

Question 5

Do you prefer Option 1 or Option 2?

☐ Option 1 Vectoring ☐ Option 2 PBN Routes and Vectoring ☐ No preference ☐ Don't know
Tick **one** box above, and add your reason for your answer below if you wish:

_____

_____

_____

_____

Question 6

If Option 2 is progressed, how frequently would you like to alternate between the routes, from the hold to the runway in use, to provide a degree of respite?

☐ Daily ☐ Every two days ☐ Weekly ☐ No preference ☐ Other (specify below) ☐ Don't know
Tick **one** box above, and add your reason for your answer below if you wish:

_____

_____

_____

_____

Question 7

If Option 2 is progressed, at what time of day would you like to change between the two routes from the hold to the runway in use?

☐ Around midnight ☐ Early morning ☐ Mid-morning ☐ No preference ☐ Don't know

Tick **one** box above, and add your reason for your answer below if you wish:

_____

_____

_____

Question 8 Technical Question (no requirement to respond)

What classification of airspace would you like the high level additional controlled airspace to the north of Luton to be?

☐ Class A ☐ Class C ☐ Class E ☐ No preference

Tick **one** box above, and add your reason for your answer below if you wish:

_____

_____

_____

_____

Question 9 Technical Question (no requirement to respond)

How much would the proposed Class D airspace required to contain the RNAV1 Transition to runway 07 north of Leighton Buzzard (PBN Route 2) impact your operation?

☐ No impact ☐ Some impact ☐ Moderate impact ☐ Significant impact ☐ Major impact

Tick **one** box above, and add your reason for your answer below if you wish:

_____

_____

_____

_____

Question 10

If you have any other comments you would like to make, please provide them here:

_____

_____

_____

_____

_____

_____

_____

_____

_____

_____

_____

_____

You may include more pages, a separate letter, picture or diagram if you wish

(The online version of this form allowed for a file to be uploaded, e.g. a letter, document, picture to provide more context for the respondent's answers).

7. How many responses were there?

7.1. There were 2,453 responses to this consultation, of which 2,426 were useable and were analysed.

7.1.1. A total of 27 online responses were removed and were not analysed:

- 1 test response from the consultation administrator
- 2 responses were withdrawn at the request of the respondent themselves
- 3 responses were removed due to abusive content
- 21 duplicate responses (respondents submitting more than one response without being clear why, e.g. the same person could legitimately represent themselves individually and also represent an organisation, or more than one organisation). Where such multiple responses were identified without a clear reason, the later response was generally retained on the assumption that they had taken time to reconsider or had found new information, and the earlier response was removed.

7.1.2. There were 4 paper (postal) responses which were subsequently input manually into the CAA's Citizen Space consultation website. One paper (postal) response was identified as a duplicate of an online response by the same person, and was removed as per the previous bullet point. Three were included in the analysis.

7.1.3. One paper (postal) response was dated 10 days after the closing date of the consultation, and was received a few days after that. This response was deemed too late, and it was not analysed.

7.2. Of the 2,426 responses analysed, 2,349 were published on the main consultation website.

7.2.1. A technical setting within the online questionnaire meant that 78 responses were received without clarity as to whether they consented to publish their names along with their responses. All 78 were submitted in the first 10 days of the consultation, after which the setting was updated, and the consent question was made mandatory rather than optional.

7.2.2. This affected c.10% of all responses received in that first 10 day period (782); the other 90% voluntarily answered the consent question. One of these responses was duplicated and was removed as per paragraph 7.1.1 above. The remaining 77 responses were analysed and are available for the CAA to audit.

7.2.3. We decided that these 77 responses should not be published along with the other 2,349, because the consent-to-publish-names question was not answered – this is in accordance with guidance we sought from the CAA's consultation experts.

7.2.4. Upon submission, all respondents were sent an acknowledgement email containing a reference code in this format: ANON-SJ4M-9xxx-x or BHLF-SJ4M-9xxx-x

7.2.5. The 77 respondents discussed in this section can check and confirm their response was included in the analysis by finding their 'ANON' reference code within Annex D: List of 77 Response Reference Codes not published, on page D-1.

7.3. For short periods during the consultation and after it closed, some responses remained temporarily in the moderating queue under the CAA's control, and were not immediately visible. As CAA moderation progressed, these responses were published. This is in line with the airspace change process CAP1616.

7.3.1. Several responses included an uploaded file via question 10. The uploaded files were not initially publicly visible when the main part of the response was published. There was a preventative website construction setting which was adjusted after the consultation closed. The uploaded files were moderated by the CAA and subsequently published with the main response.

8. How did we analyse the responses?

8.1. We analysed the 'closed' questions numerically, with each response to the answer buttons becoming a single datum, and collectively we could display charts and tables based on these statistical data.

8.2. However, the 'open' questions required interpretation of text and context. For this, we prepared a list of expected themes based on our experience of ACP consultations in general, and from the engagement that took place during the previous stages of this proposal.

8.3. We also pre-analysed a batch of responses to this consultation, to identify additional themes not otherwise included in the theme list.

8.4. Alphabetically, the 19 major themes are:

ACP Accessibility	Aircraft Operator Impact	Forecasts	Out of scope
ACP General	Aviation Technical	Noise at & above 8,000ft	Profiting
ACP Guidance	Design Change	Noise below 8,000ft	Safety Impact
ACP Publicity	Environmental Impacts	Option 1 Impact	Wildlife Impact
Air Quality	Financial Impact	Option 2 Impact	

Table 1 Major themes in this consultation

Dividing into sub-themes

8.5. These major themes were divided into sub-themes, and each sub-theme was allocated a 'tag' for analysis purposes. Each tag was associated with a topic, phrase or other context to allow the analysts to determine the intent of each element of the response text.

8.5.1. This meant that, should the topic be mentioned in the comments text submitted by respondents, the tag would be allocated, and recorded by the CAA's Citizen Space consultation analysis system.

8.5.2. The use of sub-themes allows for the analysis of each theme in greater detail, while retaining the overview of the major themes. There are a total of 117 tags, one for each sub-theme.

8.5.3. See Annex C: List of Tags for Major Themes and Sub-themes from page C-1 (Table 3).

Major themes and sub-themes per question

8.6. Initially, we expected to set up themes and tags specific to the scope of the question. We designed each question to be a combination of closed (check box choice) then open (text comments to provide context or an explanation), as described in paragraph 6.2.1 and consistent with ICCAN advice as per paragraph 6.2.2.

8.7. However, during the pre-analysis phase, it was clear that a large proportion of the text comments in the open answers did not answer the specific question we asked.

8.7.1. Very often, it was clear that the respondent had written their comments in the first comment box and had then copied/pasted them across many of the available text boxes, regardless of the question asked.

8.7.2. Regularly, the same text appeared in all ten text boxes.

8.7.3. Thus we found it necessary to make all 117 tags available for all questions, so that each question could be analysed on all themes, regardless of the original scope of the question.

8.7.4. This means that, for responses where the same text is copied/pasted in each text box, the same set of tags would be used up to ten times for that single response.

8.8. We would typically base consultation analysis on the combined responses to both 'closed' (check box) and 'open' (text comments) elements of each question, expecting the text answers to directly relate to the question asked (consistent with ICCAN advice as per paragraph 6.2.2 and noted in paragraph 8.6 on p.21 above).

8.8.1. Given that the text responses often did not directly relate to the question asked, our analysis needed to be based on:
- Answers to the 'closed' questions (i.e. the numerical data[3] based on counting the answers to each answer button);
- The themes discussed in the answers to each group of questions; and
- The overall themes from all questions.

8.8.2. This increases the complexity of both the analysis itself, and how we display the results.

The 'Design Change' major theme and sub-theme tags

8.9. Most of the themes and tags listed are self-explanatory, directly developed from responses to the consultation. One of the major themes is 'Design Change', with seven sub-theme tags.

8.10. We used these tags where we identified a suggestion to change the consulted-upon airspace design. Example suggestions are:

8.10.1. Change one of the PBN routes (move part, or all, or delete, one of the routes);

8.10.2. Change the hold (move it, change its orientation, or change its altitude);

8.10.3. Change an element of the controlled airspace (CAS) volumes (change the boundary of, the base altitude of, or delete one of the CAS Areas).

8.11. The CAA's airspace change process CAP1616 (Ref 11) requires us to categorise consultation responses into those 'which may impact the final proposals', and those 'which do not impact the final proposals'.

8.11.1. All responses tagged 'Design Change' automatically progress to Step 4A.

8.11.2. In the second feedback report Step 4A document, we will review each response containing a 'Design Change' tag, and perform a new, separate, theme analysis in more detail.

8.11.3. We will sub-divide these response themes and sub-themes into 'those which have impacted the final proposal', and 'those which have not impacted the final proposal', along with an explanation of how and why.

8.12. See Section 3 on p.6, especially Figure 4, for more details on this part of the CAA's airspace change process CAP1616 (Ref 11).

Map of respondents' postcodes

8.13. This link[4] displays a zoomable density map of all responses we received with a valid UK postcode, of which there were 2,392.

8.14. There are 34 fewer than the total number of 2,426. Some respondents did not supply a valid postcode that could be plotted by our postcode mapping system, or they had a non-UK address.

[3] Data is displayed in several charts as percentages; these have been rounded to integers, thus the displayed totals may not add up to precisely 100%. The raw data behind the charts is unrounded.

[4] Full URL is https://www.nats.aero/vr/ad6/content/postcode/responsemap/dist/

9. What did the responses say? Overview

9.1. By Area

We looked at the postcode supplied by the respondent, and noted if it was within the two major consultation areas (at & above 8,000ft and below 8,000ft[5]), or was not in the overflight area at all.

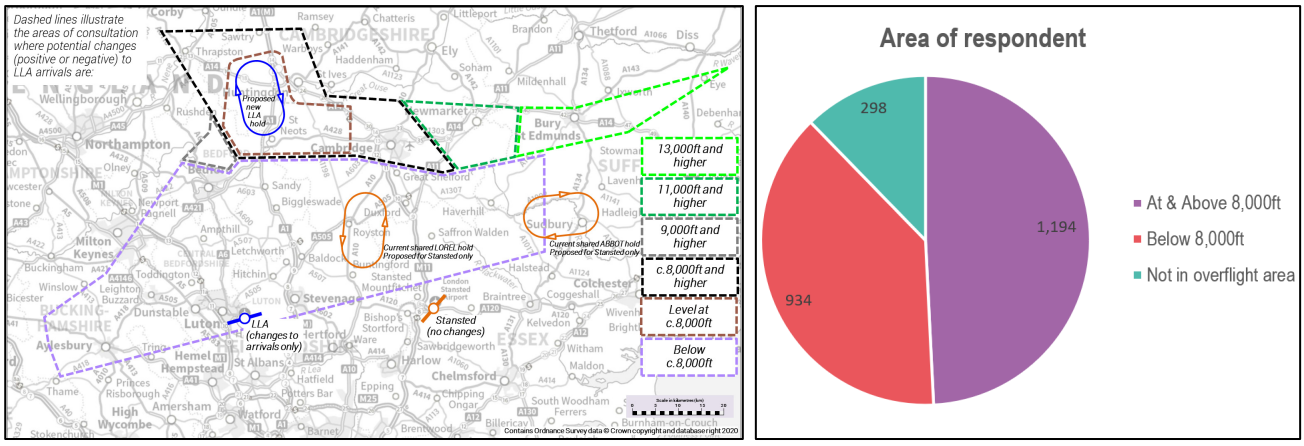


Figure 10 Consultation Areas (L), Area of Respondents (R)

The light purple area in Figure 10 (L) illustrates the general area where changes would be expected below 8,000ft. The other coloured areas are where changes would be expected at & above 8,000ft.
About half of all respondents' postcodes were within these upper areas.

9.2. Respondent Type, and by Area

This overview briefly summarises whether respondents considered themselves as representing themselves, or as representing an entire organisation (for example, a business, a local council, or a residents' association).

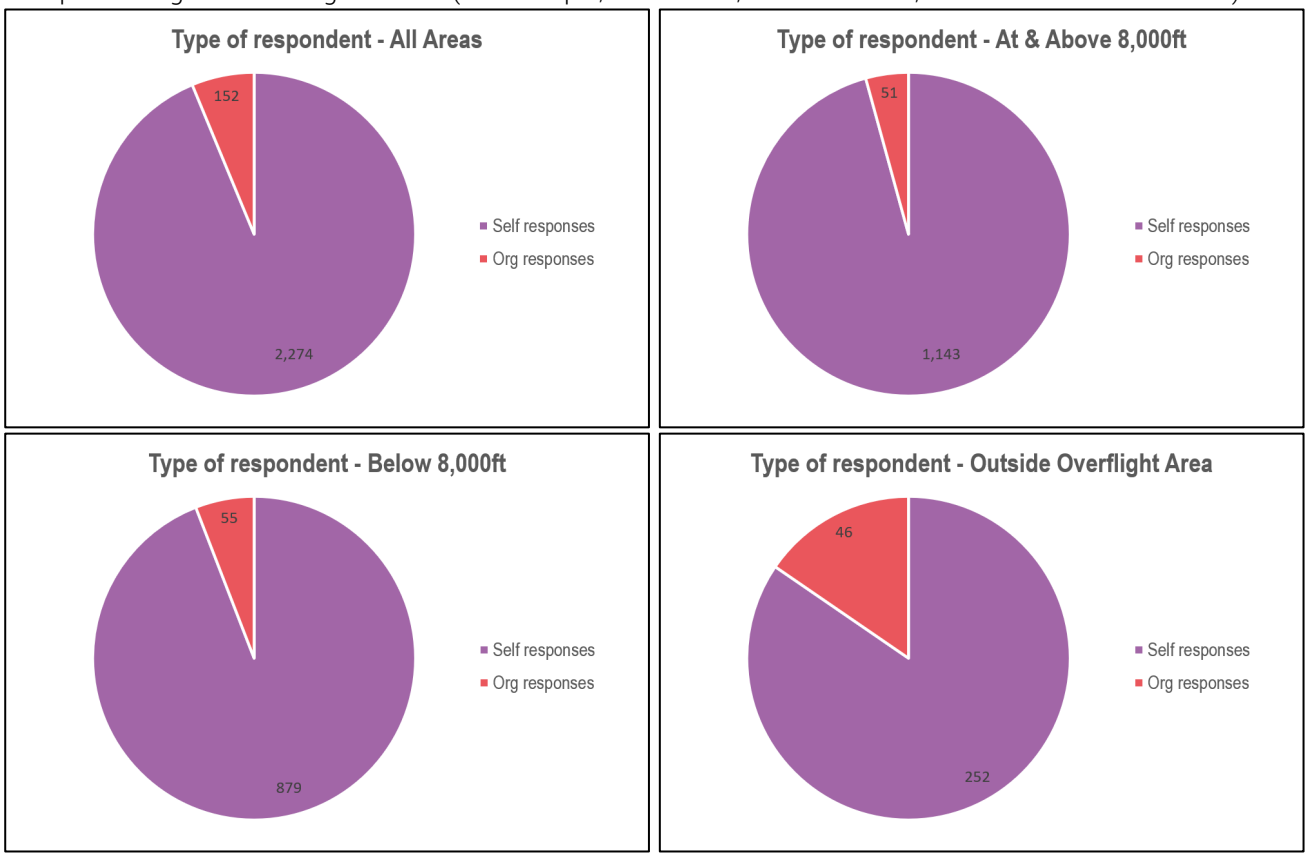


Figure 11 Type of respondent by consultation area

Outside the overflight area there were far fewer respondents, and a greater proportion was organisational.

[5] The Stage 2 documents (Refs 5, 6, 7) and the Consultation Document (Ref 8) describe how the changes were developed into upper design areas (descending towards the hold, at & above 8,000ft) and lower design areas (descending from 8,000ft towards the runway).

9.3. Transparency – Depth of theme analysis: All 19 major themes have been broken down into fully detailed analyses of sub-themes. This level of detail, and the raw data behind it, has been made available to the CAA. In this document we will present all 19 major themes in charts highlighting particular areas, ranked from the greatest number of tags to the least. We will also provide charts and tables that display how we broke down themes with the greatest number of tags, and show how we analysed them.

9.4. Examples of tagged comments: Almost all responses[6] are available to view publicly, and we have explained in Section 8 (p.21) how we themed and sub-themed each comment. As above, we will show how we analysed the top ranking themes in more depth, and in the first dataset of deeper analysis we will include examples of some of the comments that were tagged. This will explain how we took each response, applied tags to the comments, built the tags into charts and tables in order to present them effectively.

9.5. Narrative: After the first dataset of deeper analysis, we will stop providing examples of tagged comments and instead provide a brief explanation of what we understood from the charts and tables. This will explain how we interpreted the displayed data charts and tables.

[6] 77 responses were analysed but are not available to view, see paragraph 7.2 on page 20 for details.

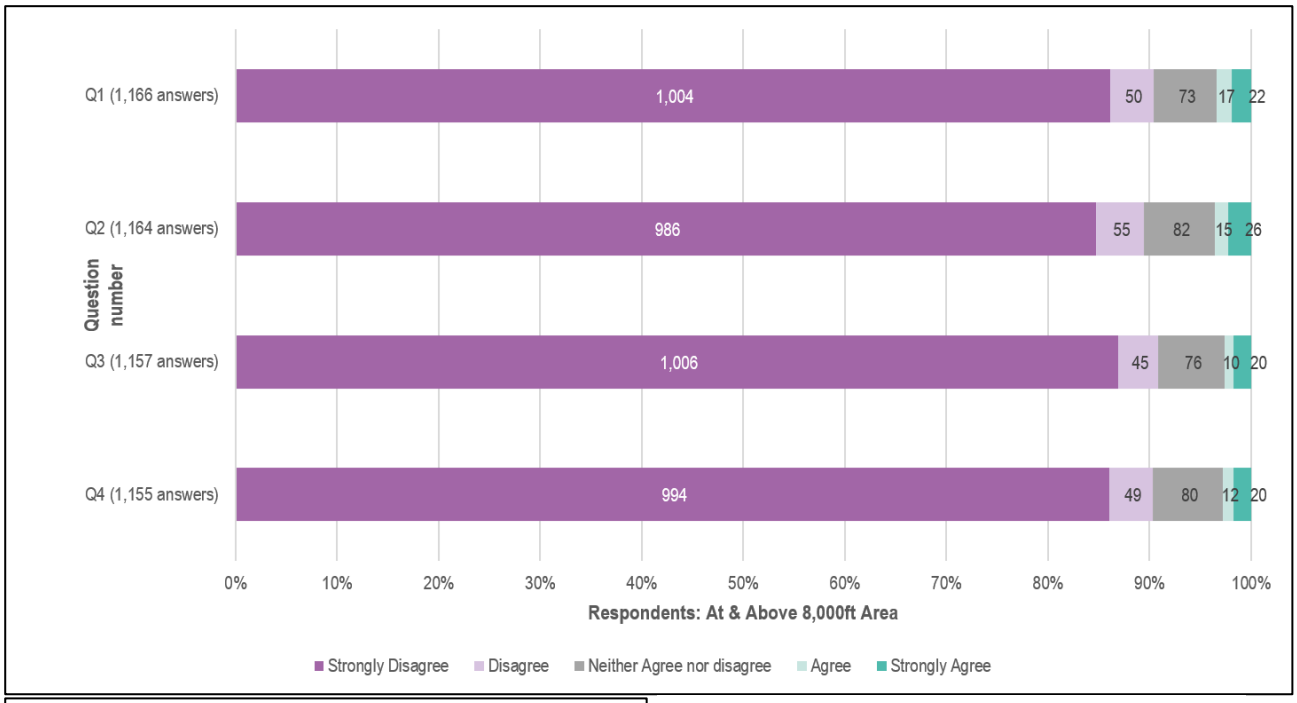
10. What did the responses say? Questions 1-5 Preference for Option 1 or 2, by Area

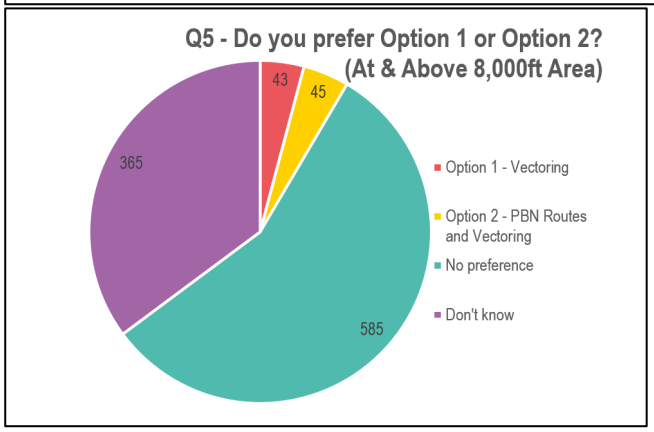
This section summarises the results for Questions 1-5, for each consultation area (At & Above 8,000ft, Below 8,000ft, and Outside Overflight Area). The questions were:

1. To what extent do you agree that Option 1 is an acceptable solution for Runway 07 (easterly)?
2. To what extent do you agree that Option 1 is an acceptable solution for Runway 25 (westerly)?
3. To what extent do you agree that Option 2 is an acceptable solution for Runway 07 (easterly)?
4. To what extent do you agree that Option 2 is an acceptable solution for Runway 25 (westerly)?
5. Do you prefer Option 1 or Option 2?

Q1-Q4 can be grouped into a single chart, with Q5 illustrating overall preferences per area.

10.1. At & Above 8,000ft Area: Q1-Q5 Statistical Data





The bar chart above illustrates that c.90% of respondents in this area disagreed that either of the two Options was an acceptable solution.

The pie chart to the left illustrates that c.92% of respondents in this area who answered this question either had no preference for Option 1 or Option 2, or did not know which to prefer.

Those who did express a preference were evenly split with c.4% for each Option.

Figure 12 At & Above 8,000ft Area: Q1-Q4 (top) and Q5 (above)

10.2. At & Above 8,000ft Area: Q1-Q5 Themes

10.2.1. Some respondents stated in the comments box for Q5 that their answer of 'No preference' or 'Don't know' should be considered a proxy for 'Neither option' or 'Do nothing', which was not presented as a choice.

10.2.2. In the consultation document we explained that doing nothing was not an option, and that the design options presented were the only viable concepts. Therefore we used the numerical answers as they were given in the survey and did not ascribe an alternate meaning.

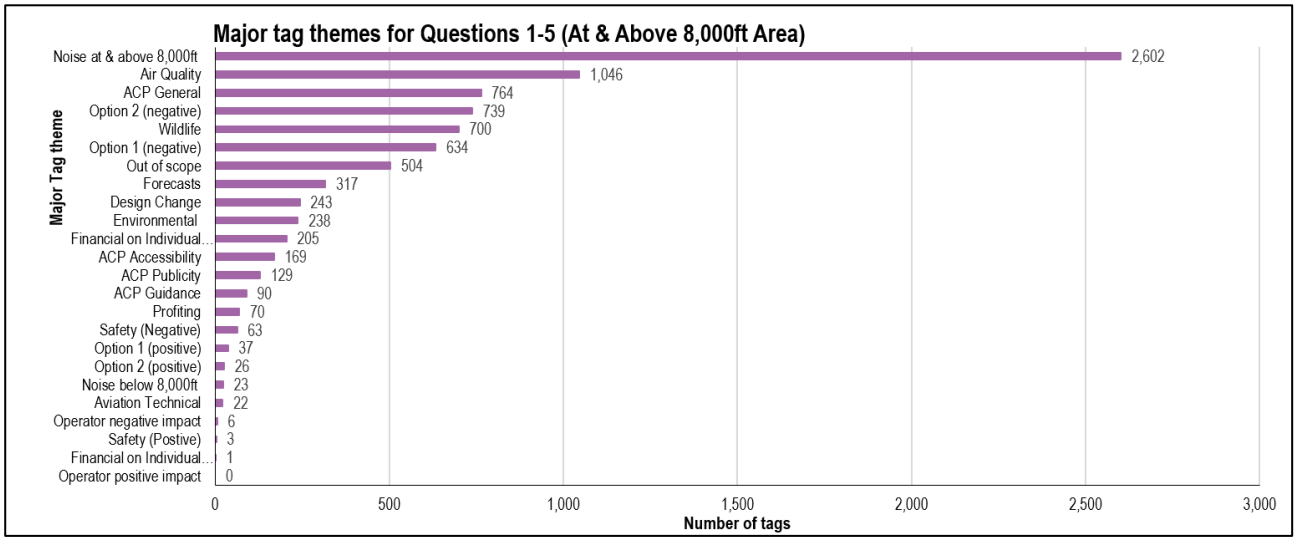
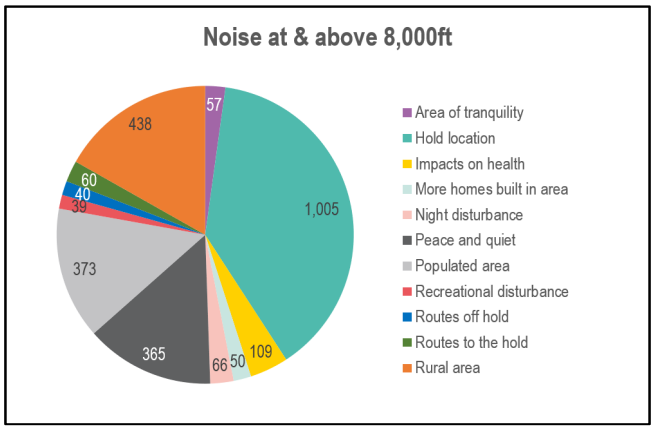


Figure 13 At & Above 8,000ft Area: Major themes for Q1-Q5

10.2.3. Figure 13 illustrates and groups the major themes extracted from Q1-Q5 comments boxes during the tagging analysis. The following charts provide further analysis of the major themes with the greatest number of tags, in descending order, and include example comments extracted from the overall response to illustrate tagging.



Example tagged comments:

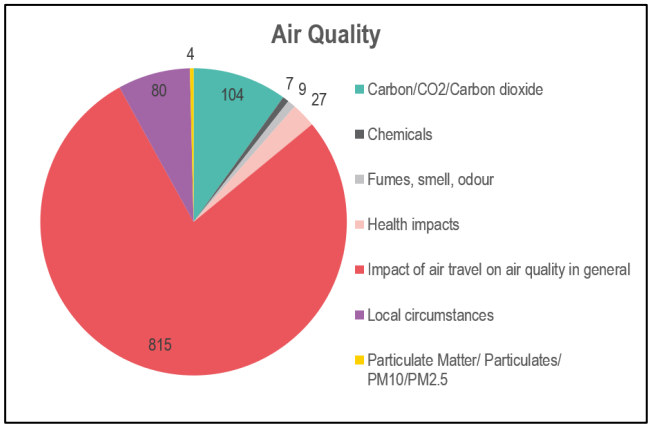
Hold location:
"I do not want a holding pattern to be circulating above the St Neots area"

Rural area:
"The proposal would route aircraft over an area that is largely made up of villages that currently enjoy a quiet rural setting."

Populated area:
"Proposed stack is over an area with considerable population, there are many less densely populated areas that would be more suitable and cause less disturbance"

Peace and quiet:
"St Neots is a quiet town away from airports deliberately for a quiet peaceful home"

Figure 14 Sub-theme analysis: Noise at & above 8,000ft



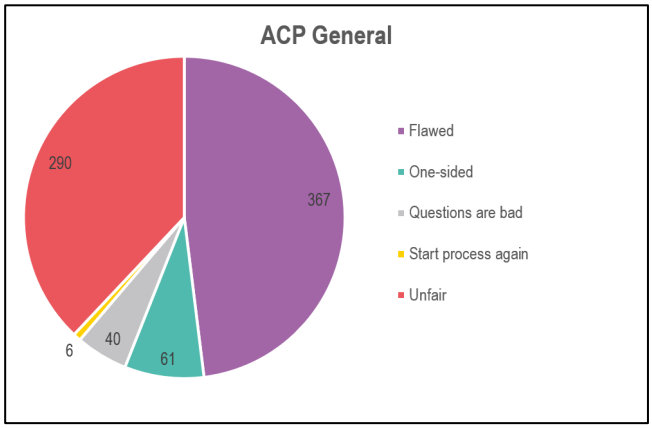
Example tagged comments:

Impact of air travel on air quality in general:
"Increased pollution in St Neots area"
"I don't want the additional air and noise pollution"

Carbon/CO_2/Carbon dioxide:
"The people of Huntingdonshire are aiming for Carbon Zero and this would counteract this"

Local circumstances:
"I have already been affected by the significant development of the new A14/A1 road"

Figure 15 Sub-theme analysis: Air quality



Example tagged comments:

Flawed:

"a change to the timings of many of these flights(that's if they are ever to come back the [sic] their previous timetable) is an option that removes the need for your proposals. You have achieved your 'Tick Box' exercise"

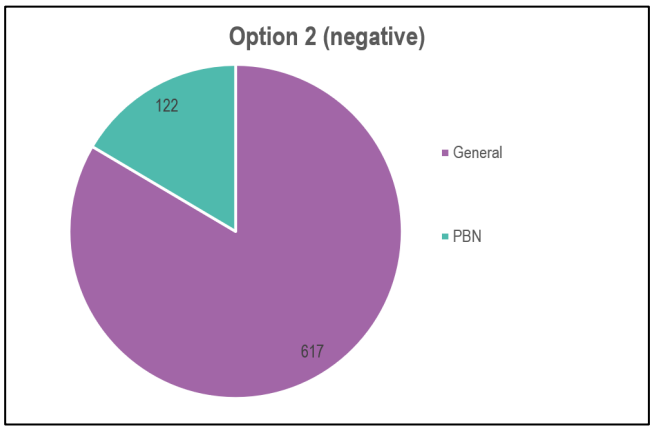
"There [sic] is a flawed proposal which has been overtaken by events"

Unfair:

"There is also seemingly no direct consultation on this issue - it appears a fait accompli"

"Unhappy with all options"

Figure 16 Sub-theme analysis: ACP General



Example tagged comments:

PBN:

"The proposed routing over a narrow swathe results in severe outcomes for those newly overflown"

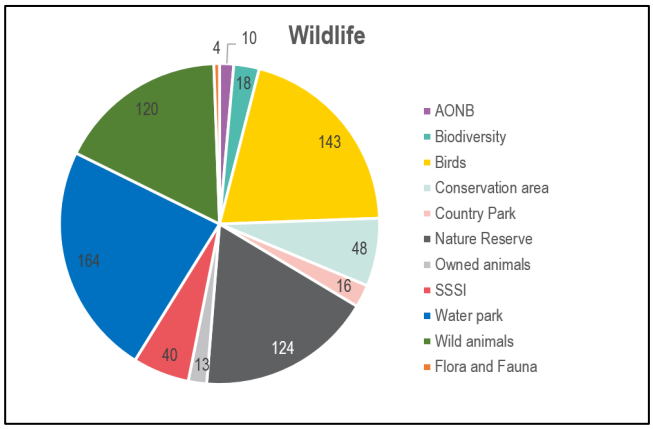
"…Option 2 is even less acceptable due to the narrower flight path, and therefore more concentrated air traffic"

General:

"The 'holding' area for circling aircraft will be directly above my home for all options"

"No option is good if it means that there is a new holding stack above my village of Buckden and surrounding areas"

Figure 17 Sub-theme analysis: Option 2 (negative)



Example tagged comments:

Water park:

"I live on the shores of Grafham Water"

Birds:

"High numbers of rare birds"

Nature Reserve:

"Fen Drayton & Godmanchester nature reserves directly below this plan"

Wild animals:

"1500 acres of countryside, teeming with wildlife"

Figure 18 Sub-theme analysis: Wildlife

Sub-theme analysis: Option 1 (negative) had no further depth because all comments were tagged as General in this instance – hence there is no need for a chart with a single data item.

We expected comments on a sub-theme of Dispersion for this theme, however there were none in this Respondent Area dataset.

Example comments tagged as Option 1 (negative) General:

> "I seem to be effected [sic] by both options"
>
> "I don't agree with any holding areas over the Huntingdon/ St. Neots areas"
>
> "The proposed new hold area is above my house, and I don't want to be overflown, even if it is at or above 8,000 ft."

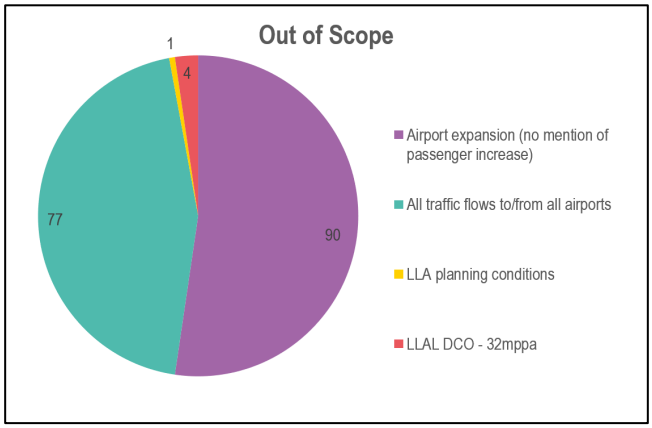


Figure 19 Sub-theme analysis: Out of scope

Example tagged comments:

Local circumstances:

"Brampton already has enough noise from A1 and A14"

"The local area has faced years of disruption to relocate the A14 main road"

Airport expansion:

"The justification for the new proposals is the need to plan for further expansion at London Luton"

All traffic flows to/from all airports:

"Nearby US/RAF Air Bases"

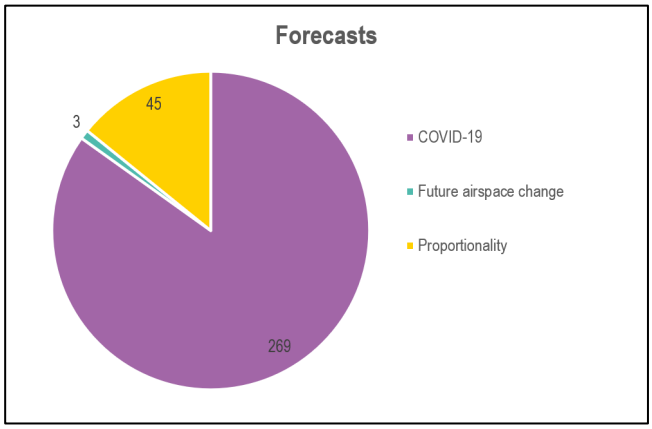


Figure 20 Sub-theme analysis: Forecasts

Example tagged comments:

COVID-19:

"I do not believe there will be a rise in air traffic beyond pre-COVID levels for some time"

"I disagree with the fundamental premise that travel pattern will/should return to and then increase beyond pre-COVID levels"

Proportionality:

"Future flight traffic is likely to decrease not increase; there is no genuine reason for this change"

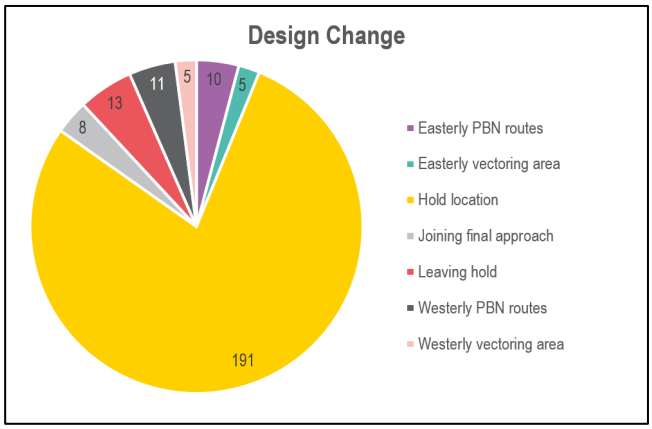


Figure 21 Sub-theme analysis: Design Change

Example tagged comments:

Hold location:

"The stack should be relocated to areas such as the Fens where there is little population"

"Move the hold pattern just a few miles West and you avoid creating noise in the large town of Huntingdon"

"Move it a couple of miles north and you move away from the large town of St Neots"

"Put it over large population centres and busy roads (A1, A14, A428) to the east, where noise would be barely noticeable"

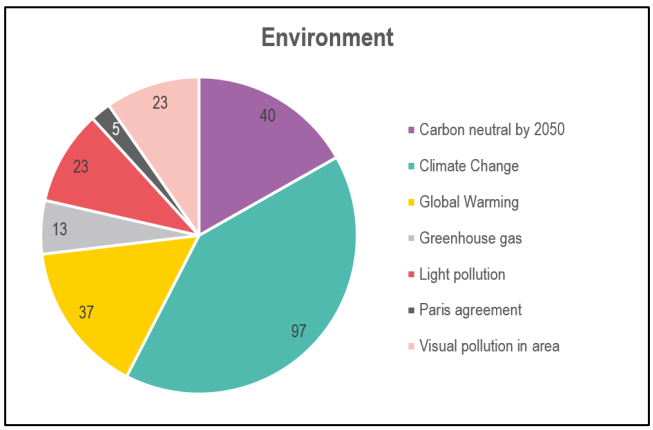


Figure 22 Sub-theme analysis: Environment

Example tagged comments:

Climate change:

"I don't feel that the options take into account any serious climate change considerations"

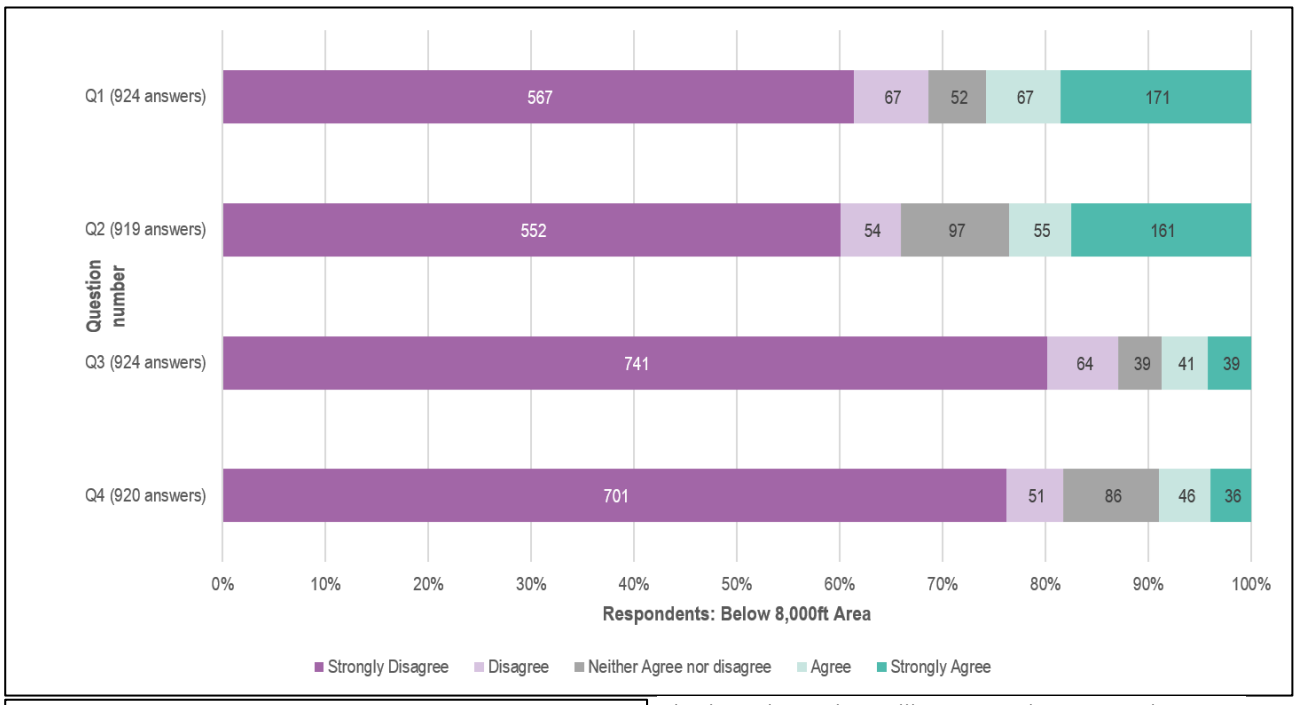
Carbon neutral by 2050:

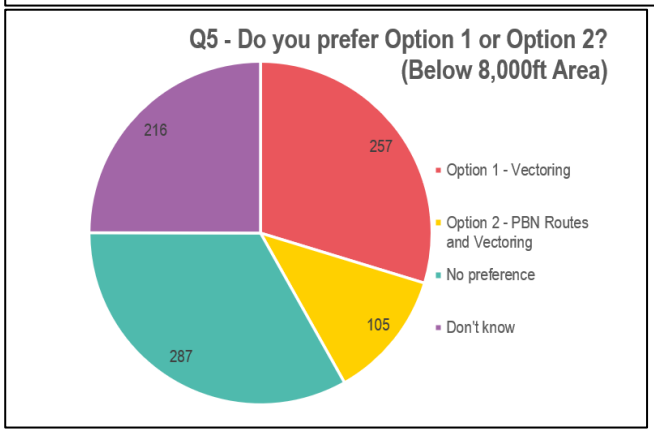
"Goes against the Government's own target of net zero carbon emissions by 2050"

Global warming:

"The whole proposal is invalid because the impact of global warming climate change initiatives and covid-19 is as yet unknown"

10.3. Below 8,000ft Area: Q1-Q5 Statistical Data





The bar chart above illustrates that Q1 and Q2 (asking about Option 1) resulted in less negative feedback, and more positive feedback, than Q3 and Q4 (Option 2) in this area.

The pie chart to the left illustrates that Option 1 was preferred by two and a half times as many respondents as Option 2 in this area

Figure 23 Below 8,000ft Area: Q1-Q4 (top) and Q5 (above)

10.4. Below 8,000ft Area: Q1-Q5 Themes

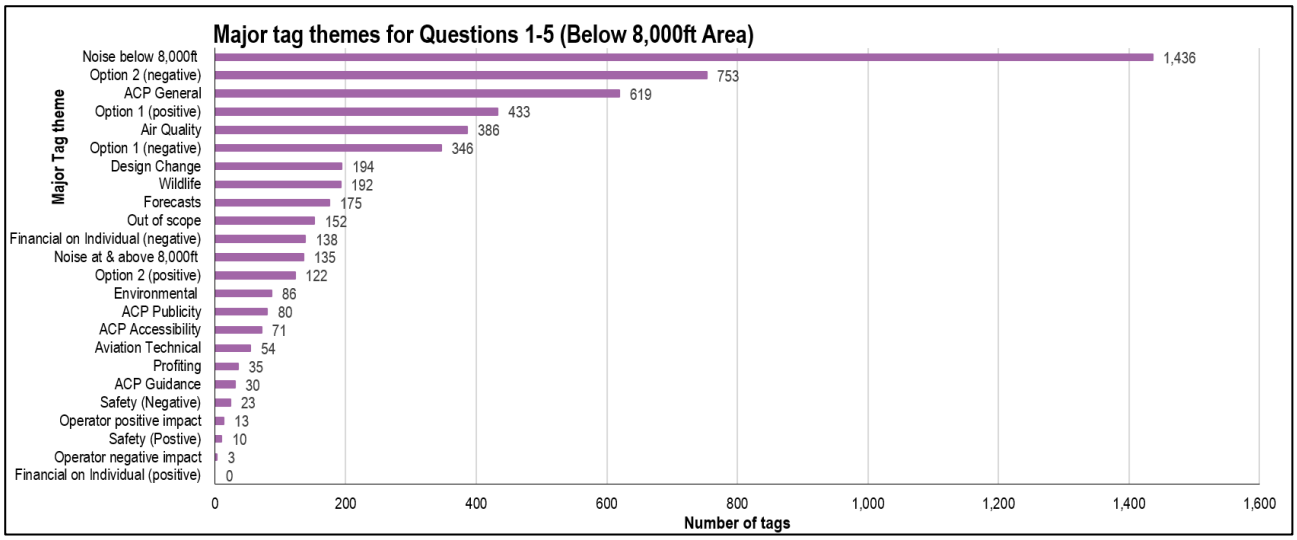


Figure 24 Below 8,000ft Area: Major themes for Q1-Q5

10.4.1. Figure 24 illustrates and groups the major themes extracted from Q1-Q5 comments boxes during the tagging analysis. The following charts provide further analysis of the major themes with the greatest number of tags, in descending order, with Design Change included.

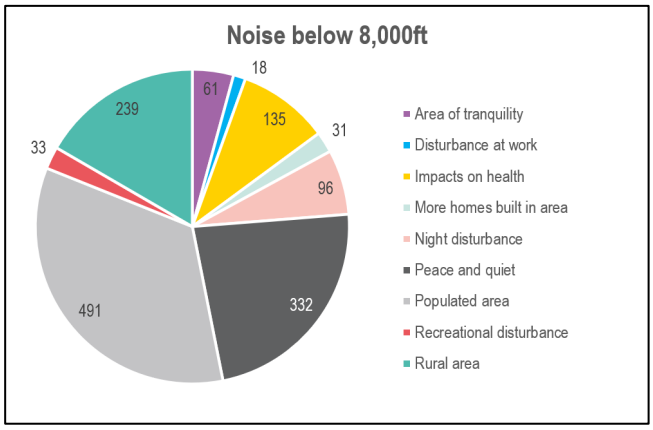


Figure 25 Sub-theme analysis: Noise below 8,000ft

Narrative:

Noise below 8,000ft over a populated area was tagged most, with noise over a rural area tagged third.

Peace and quiet was tagged second.

Comments in these three sub-themes contradicted each other. Some suggested that new noise would be more noticeable in quiet areas and it would be better suited to an already-noisy urban area. Others suggested that new noise should not be near populated areas and would instead affect fewer people in sparsely populated rural areas.

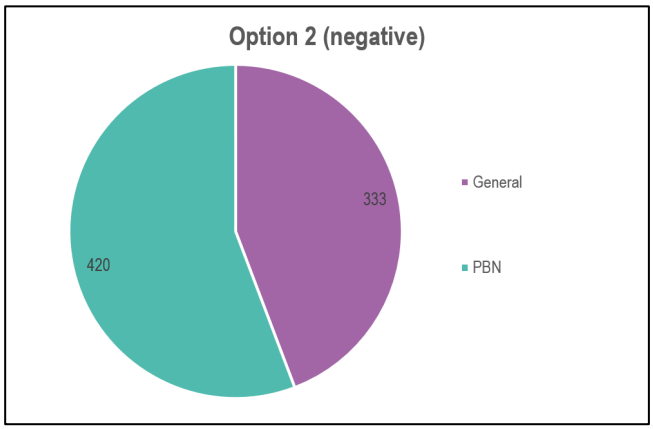


Figure 26 Sub-theme analysis: Option 2 (negative)

Narrative:

This included the tagging of comments that highlighted the greater concentration of air traffic due to the PBN routes described in the consultation, as a negative impact. More tags were allocated on the sub-theme of PBN than other, more general negative comments about Option 2.

See also Figure 28 on p.31.

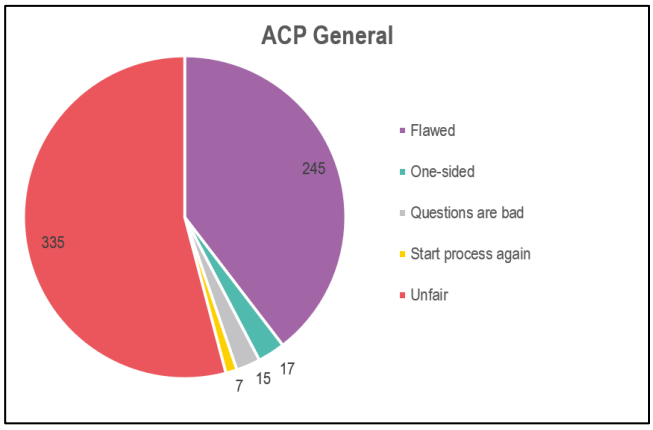


Figure 27 Sub-theme analysis: ACP General

Narrative:

The majority of tags in this ACP General theme relate to perceived unfairness of the proposal itself, sometimes that it is a foregone conclusion/fait accompli or similar.

The next ranked tag came from comments that the consultation process, or the proposal as a whole, was flawed. For example, claims that we were not adhering to process or that the entire concept of this change was in error. This contrasts with the process description in the consultation document, and the CAA's approval for the consultation to take place in accordance with a pre-approved strategy and pre-approved materials.

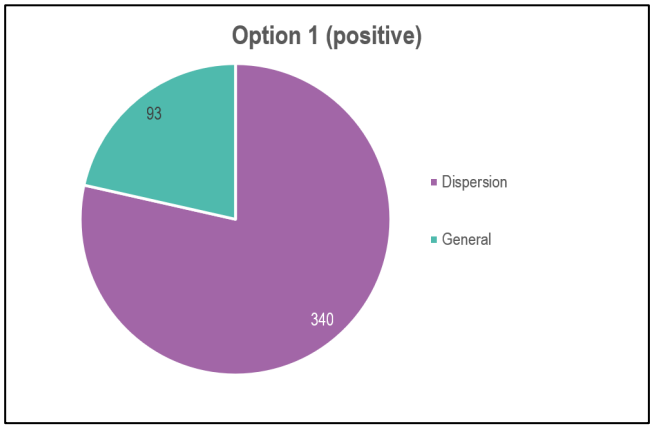


Figure 28 Sub-theme analysis: Option 1 (positive)

Narrative:

The majority of positive comments about Option 1 were related to the fact that dispersion of flightpaths was more likely – and less likely that change would be perceived at lower altitude.

This is consistent with Figure 26 above, in which more tags were allocated in a negative manner against Option 2's PBN routes that would tend to concentrate the flightpath.

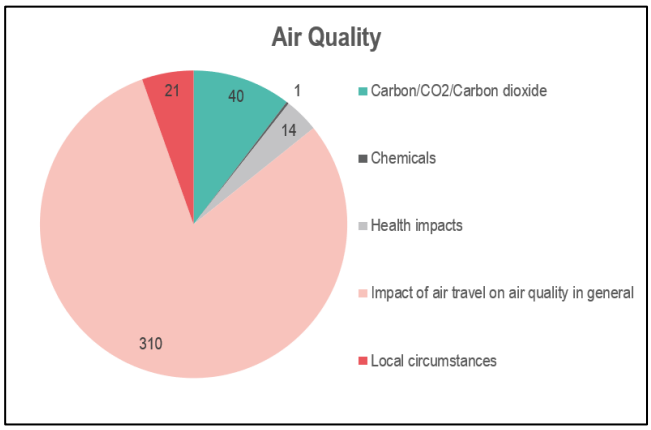


Figure 29 Sub-theme analysis: Air quality

Narrative:

The impact of air travel on air quality in general was tagged most often in this theme. This contrasts with the Consultation Document (Ref 8) which stated, on page B-2, that Government guidance says that aircraft flying higher than 1,000ft are unlikely to have a significant impact on local air quality, and no changes at such a low altitude are proposed here.

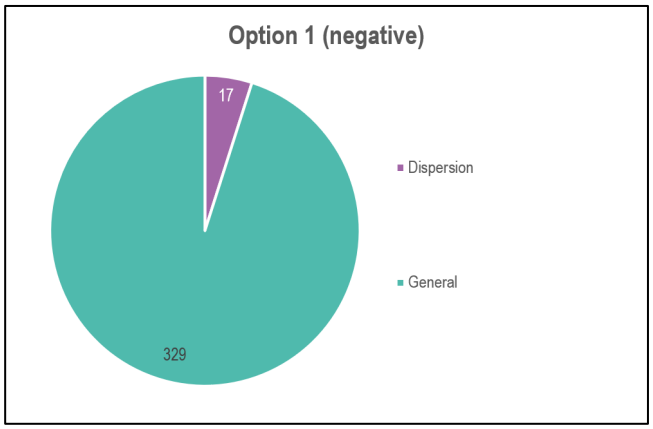


Figure 30 Sub-theme analysis: Option 1 (negative)

Narrative:

Here, relatively few tags were allocated concerning the negative aspects of the relative dispersion that would come with Option 1's airspace design.

This is consistent with Figure 28 in which Option 1's relative dispersion was seen as positive.

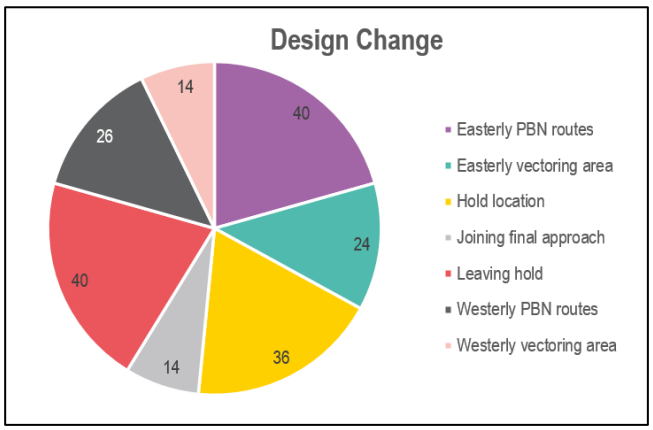


Figure 31 Sub-theme analysis: Design Change

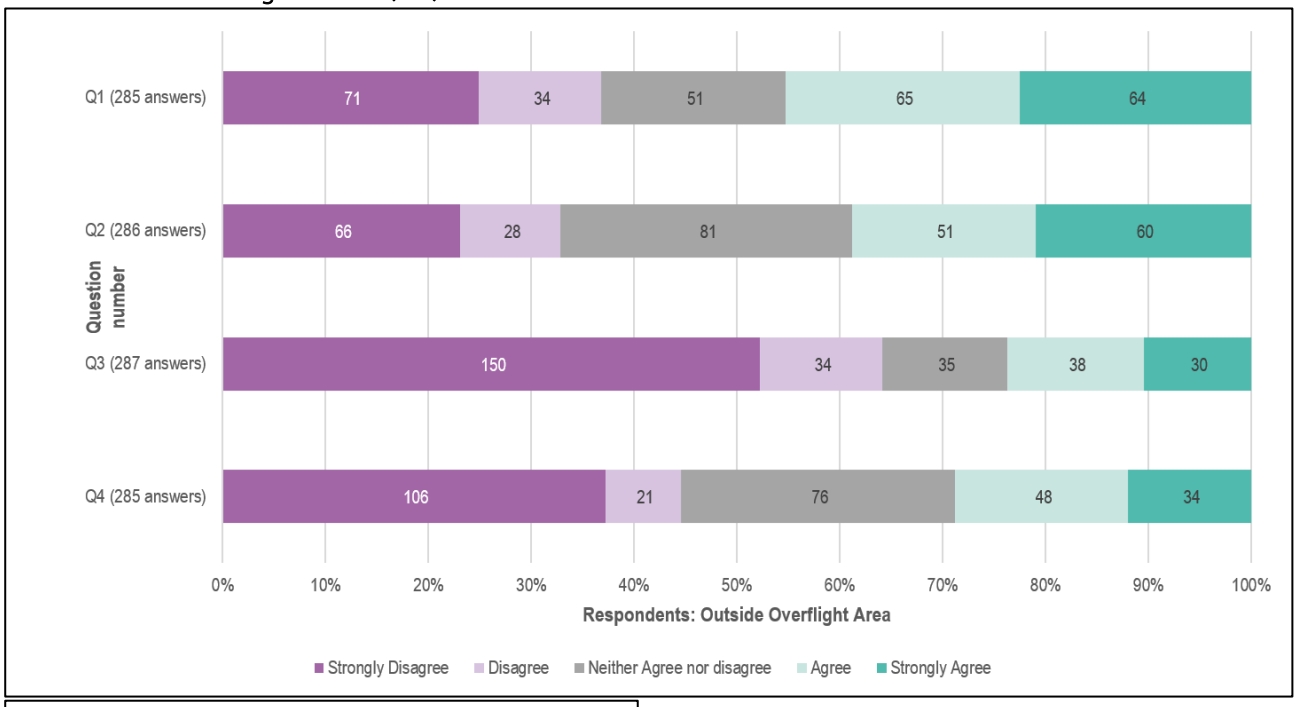
Narrative:

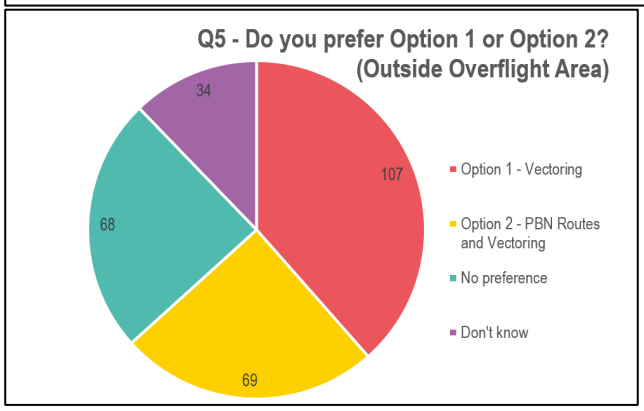
Three sub-themes of design change suggestions were allocated a similar proportion of tags: Hold location, leaving the hold, and easterly PBN routes.

Several specific recommendations to change the hold location were received and tagged, likewise suggestions to change the flightpath leaving the hold.

Several recommendations to change or delete the easterly PBN routes came from the local gliding community, who would be more impacted by a technical airspace consequence of the easterly PBN routes.

10.5. Outside Overflight Area: Q1-Q5 Statistical Data





The bar chart above illustrates that Q1 and Q2 (asking about Option 1) resulted in less negative feedback and more positive feedback than Q3 and Q4 (Option 2), outside the overflight area.

The pie chart to the left illustrates that Option 1 was preferred by one and a half times as many respondents as Option 2, outside the overflight area.

Figure 32 Outside the Overflight Area: Q1-Q4 (top) and Q5 (above)

10.6. Outside the Overflight Area: Q1-Q5 Themes

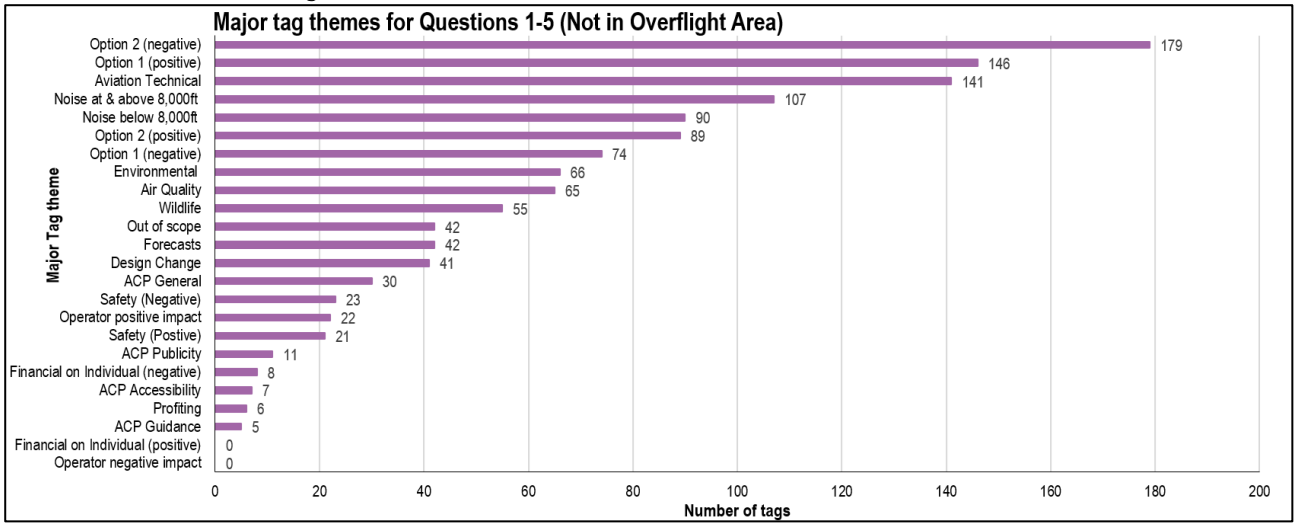


Figure 33 Outside the Overflight Area: Major themes for Q1-Q5

There were far fewer responses from respondents outside the overflight area, hence fewer tags were allocated. It would therefore not be proportional to present the in-depth sub-theme analysis for this much smaller dataset. This data has been considered as part of the review, has been analysed to the same depth, and is available for the CAA to review upon request.

10.7. Inferences drawn from this Section: Q1-Q5 Option Preference

At & Above 8,000ft:

10.7.1. There was no clear preference between Option 1 and Option 2.
We infer that respondents understood that the options are identical until descending below 8,000ft.

10.7.2. Noise had by far the greatest number of tags, more than 2.5 times as many as the next major theme (see Figure 13 on p.26).

10.7.3. Looking deeper into the Noise tags, by far the greatest number of sub-theme tags was Hold Location (more than twice as many as the next ranking sub-theme tag, some 39% of the total Noise tags, see Figure 14 on p.26). We infer that perception of new noise impacts due to the establishment of a hold in the consulted-upon location (between Huntingdon and St Neots in Cambridgeshire) was the cause of this number of responses.

10.7.4. The Air Quality theme was sub-themed into Impact of Air Travel On Air Quality In General, and Carbon Dioxide. Local air quality is unlikely to be impacted by this proposal (see 'Below 8,000ft' Figure 29 p.31 for details, which are the same for 'At & Above 8,000ft'). However, this consultation stated an increase in CO_2, a consequence of the separation of LLA arrivals from Stansted arrivals, causing LLA arrivals to travel slightly further which is not entirely outweighed by the far greater airspace systemisation. Its importance was noted during the comment tagging and manifested both under this theme and the separate, but associated, Environment theme (see Figure 22 on p.28).

Below 8,000ft:

10.7.5. There was a clear preference for Option 1 over Option 2, inferred from the lesser negative feedback and greater positive feedback for Option 1 (Q1-Q4) combined with the results of Q5. We also infer that respondents understood that there would be a difference between Options below 8,000ft.

10.7.6. Noise had by far the greatest number of tags, with twice as many as the next major theme, however we can also infer that the next ranking major theme – Option 2 (Negative) – is related, if we go deeper into the sub-themes of both. See Figure 24 on p.29.

10.7.7. Looking deeper into the Noise tags (Figure 25 on p.30), the top ranked sub-theme tags were in contrast. We infer that those who responded from rural areas would prefer to place new noise over already-noisy urban areas; and that those who responded from populated areas would prefer to place new noise in sparsely populated areas. Both would prefer to maintain peace and quiet via different means, and the perceived fairness of noise dispersal vs. concentration over smaller areas was also commented upon.

10.7.8. Looking deeper into the Option 2 (Negative) tags (Figure 26 on p,30), the greatest number of tags was allocated to comments mentioning Performance Based Navigation (PBN). We infer that the flight concentrations and associated noise impacts, which are more likely under Option 2, were understood by this group of respondents and commented upon negatively.

10.7.9. The Air Quality theme's highest-ranking sub-theme tags are extremely similar in proportions to the equivalent 'At & Above 8,000ft' in paragraph 10.7.4 above, which therefore applies here in the 'Below 8,000ft' area.

Outside the Overflight Area:

10.7.10. There was a preference for Option 1 over Option 2, inferred from the lesser negative feedback and greater positive feedback for Option 1 (Q1-Q4) combined with results of Q5.

10.7.11. The top three major themes were Option 2 (Negative), Option 1 (Positive) and Aviation Technical. We infer that respondents from outside both consultation overflight areas nevertheless had negative opinions on Option 2, positive opinions on Option 1, and had technical aviation expertise. This could be consistent with a response campaign by members of the local gliding community living outside the consultation area, who perceived they would be negatively impacted by Option 2 due to an airspace consequence of the PBN routes underpinning that Option.

11. What did the responses say? Questions 6 and 7 Option 2 Route Alternation, by Area

This section summarises the results for Questions 6 and 7 which were exclusively about Option 2 Route Alternations, for each consultation area (At & Above 8,000ft, Below 8,000ft, and Outside Overflight Area). The questions were:

6. If Option 2 is progressed, how frequently would you like to alternate between the routes, from the hold to the runway in use, to provide a degree of respite?
7. If Option 2 is progressed, at what time of day would you like to change between the two routes from the hold to the runway in use?

11.1. At & Above 8,000ft Area: Q6-Q7 Statistical Data

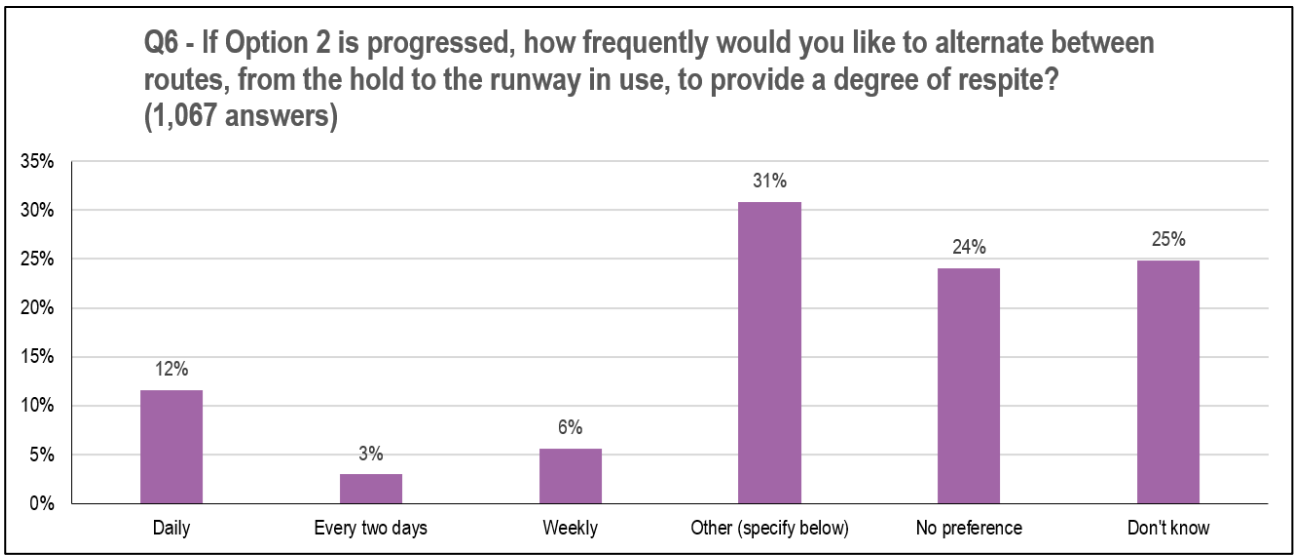


Figure 34 At & Above 8,000ft Area: Q6 Statistical Data

The chart above illustrates that about $^{1}/_{5}$ of respondents who answered this question in the At & Above 8,000ft area chose one of the suggested alternation frequencies, with Daily being the most preferred. The option 'Other (specify below)' invited a different frequency to be suggested, however this was generally used to provide feedback not relevant to this question.

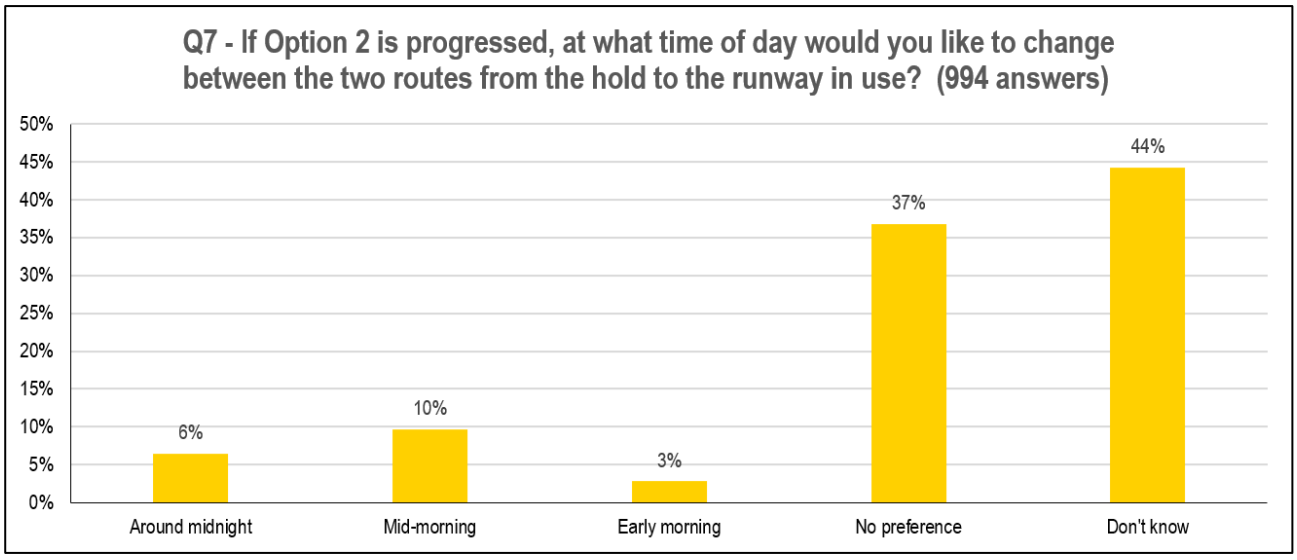


Figure 35 At & Above 8,000ft Area: Q7 Statistical Data

The chart above illustrates that about $^{1}/_{5}$ of respondents who answered this question in the At & Above 8,000ft area chose one of the suggested alternation frequencies, with Mid-morning being the most preferred. As per Q6, the feedback received in the accompanying text box was often not relevant to this question.

Note: Option 2's PBN route alternation and timing would have no direct impact on respondents in the At & Above 8,000ft area because the flightpaths would be the same until descending below 8,000ft.

11.2. At & Above 8,000ft Area: Q6-Q7 Themes

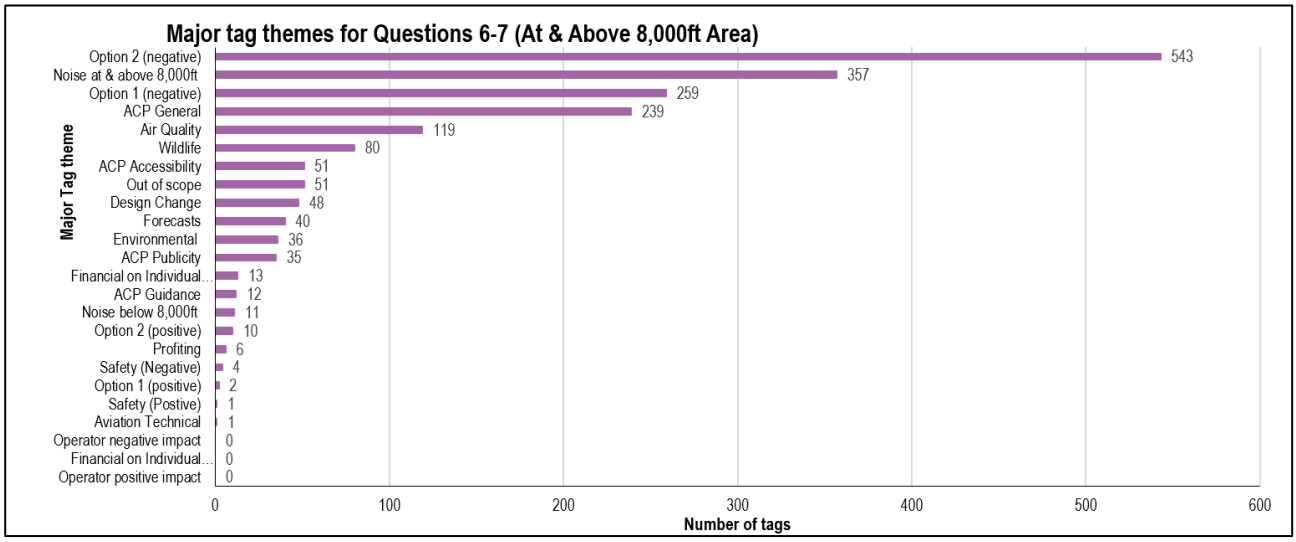
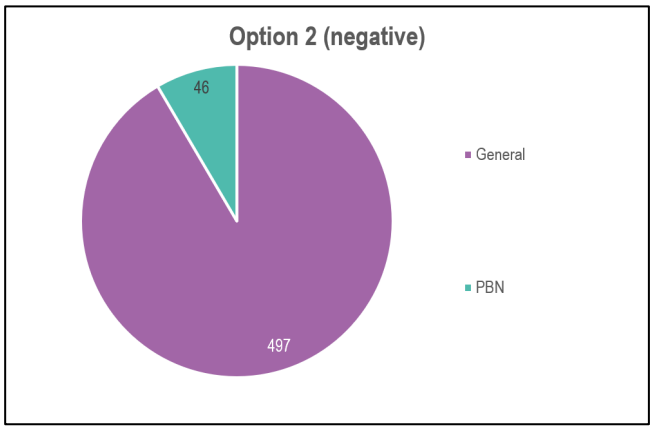


Figure 36 At & Above 8,000ft Area: Q6-Q7 Themes

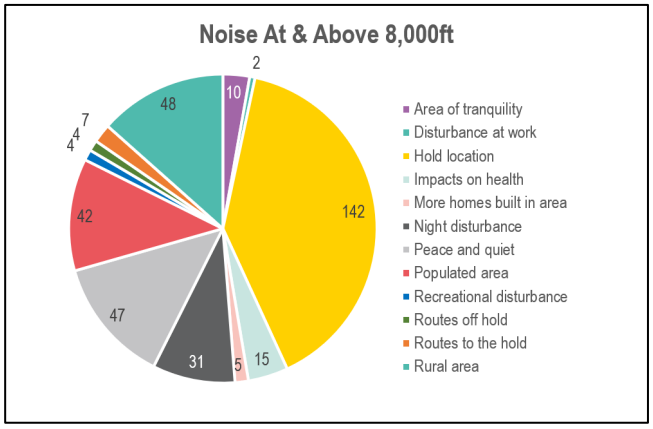
11.2.1. Figure 36 illustrates and groups the major themes extracted from Q6-Q7 comments boxes during the tagging analysis. The following charts provide further analysis of the major themes with the greatest number of tags, in descending order, with Design Change included.



Narrative:

Given that this question was about Option 2's route alternation frequency, there were proportionally fewer tags allocated to the PBN concept and the general nature of negative tags was noted.

Figure 37 Sub-theme analysis: Option 2 (negative)



Narrative:

Given that the impact of route alternation on noise impacts at & above 8,000ft would be nil, it is likely that many respondents in this area had provided similar text comments while completing the survey and had not attempted to answer the specific questions asked.

This may have been recognised by the tagging analysis because the relative proportions of tags in this sub-theme are noticeably similar to the proportions of the equivalent chart at Figure 14 on p.26.

Figure 38 Sub-theme analysis: Noise At & Above 8,000ft

Sub-theme analysis: Option 1 (negative) had no further depth because all 259 comments were tagged as General in this instance – hence there is no need for a chart with a single data item.

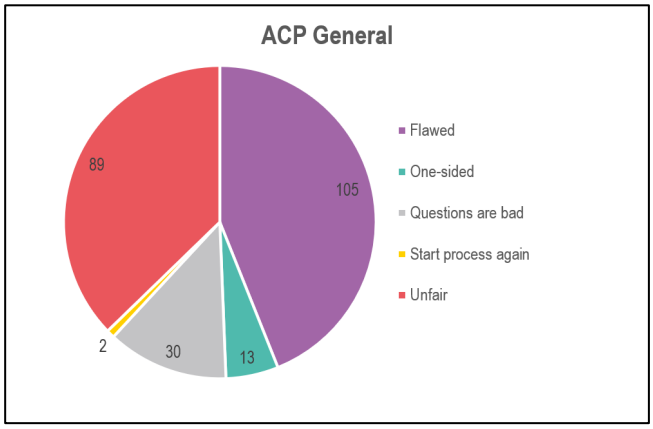


Figure 39 Sub-theme analysis: ACP General

Narrative:

We tagged comments about running a sham consultation, using flawed concepts, proceeding without justification and of fait accompli.

It is also likely that many respondents in this area had provided similar text comments while completing the survey and had not attempted to answer the specific questions asked.

This may have been recognised by the tagging analysis because the relative proportions of tags in this sub-theme are noticeably similar to the proportions of the equivalent chart at Figure 16 on p.27.

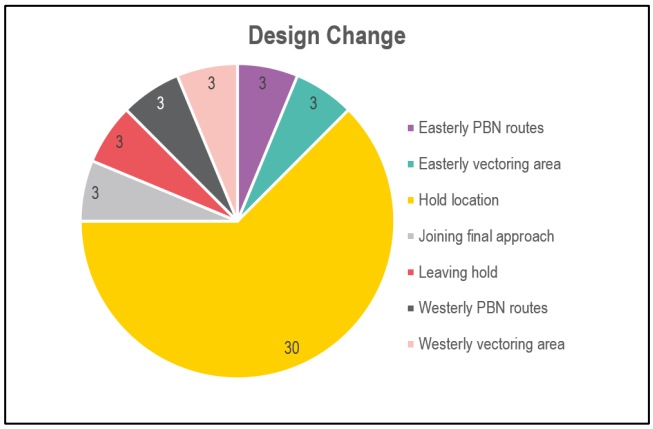


Figure 40 Sub-theme analysis: Design Change

Narrative:

The greatest number of design change tags was allocated to comments specifically recommending changes to the hold location or altitude.

11.3. Below 8,000ft Area: Q6-Q7 Statistical Data

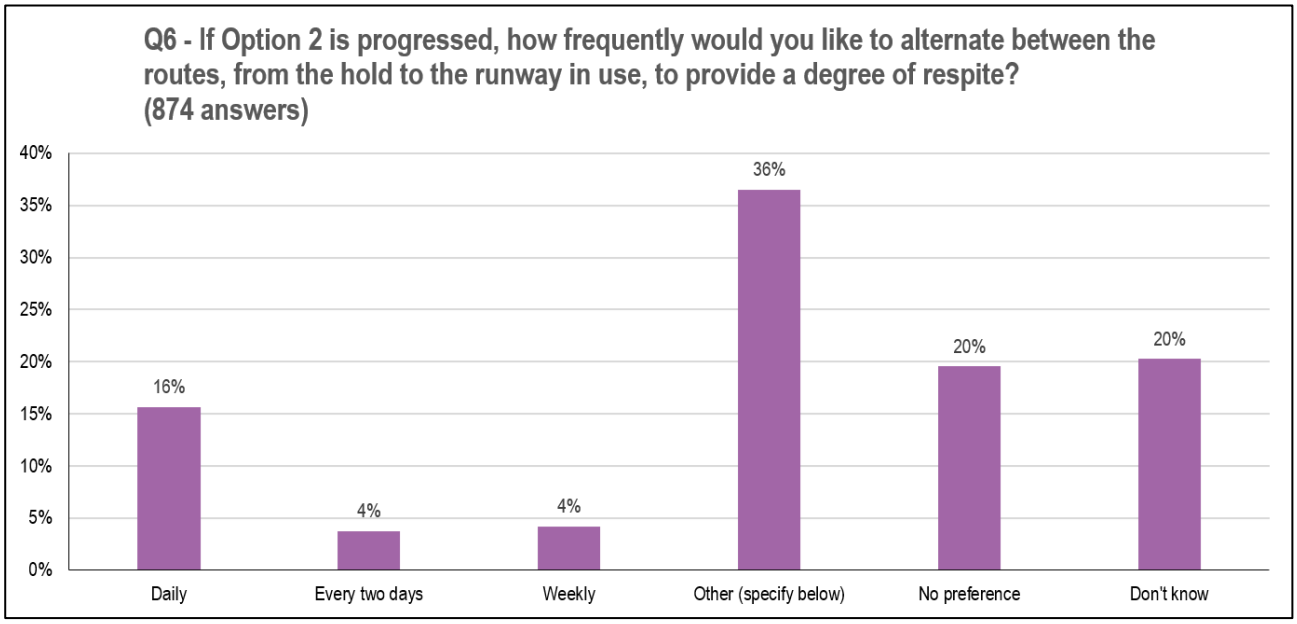


Figure 41 Below 8,000ft Area: Q6 Statistical Data

The chart above illustrates that about ¼ of respondents who answered this question in the Below 8,000ft area chose one of the suggested alternation frequencies, with Daily being the most preferred. The option 'Other (specify below)' invited a different frequency to be suggested, however this was often used to provide feedback not relevant to this question.

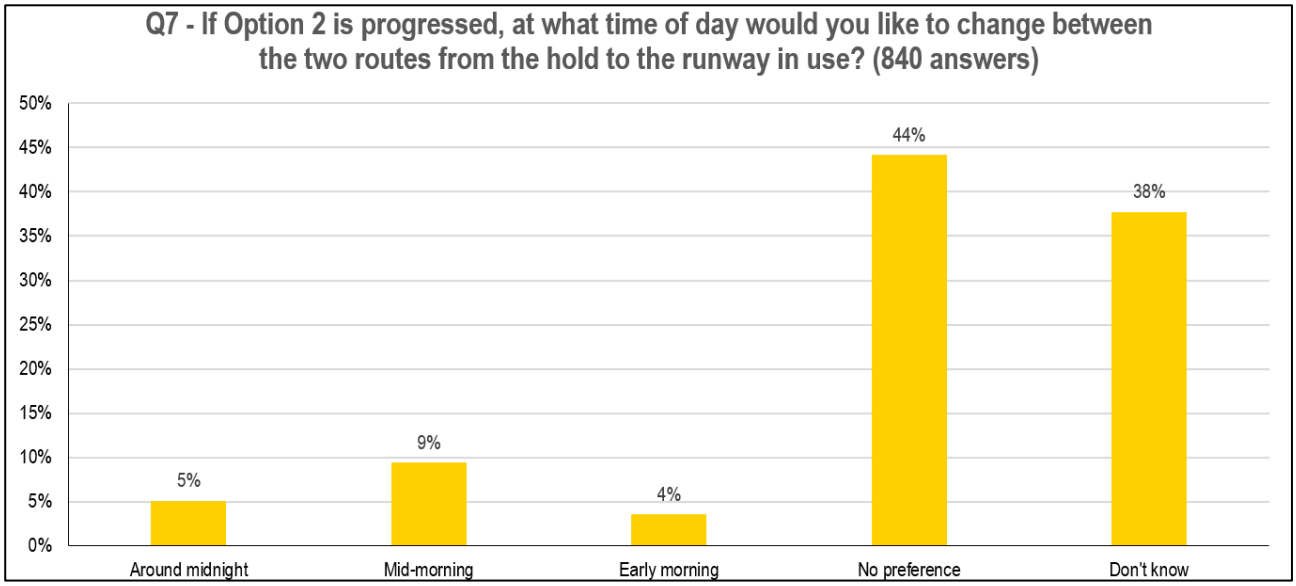


Figure 42 Below 8,000ft Area: Q7 Statistical Data

The chart above illustrates that about $^{1}/_{5}$ of respondents who answered this question in the Below 8,000ft area chose one of the suggested alternation frequencies, with Mid-morning being the most preferred. As per Q6, the feedback received in the accompanying text box was often not relevant to this question.

Note: Option 2's PBN route alternation and timing would have most impact in this Below 8,000ft area.

11.4. Below 8,000ft Area: Q6-Q7 Themes

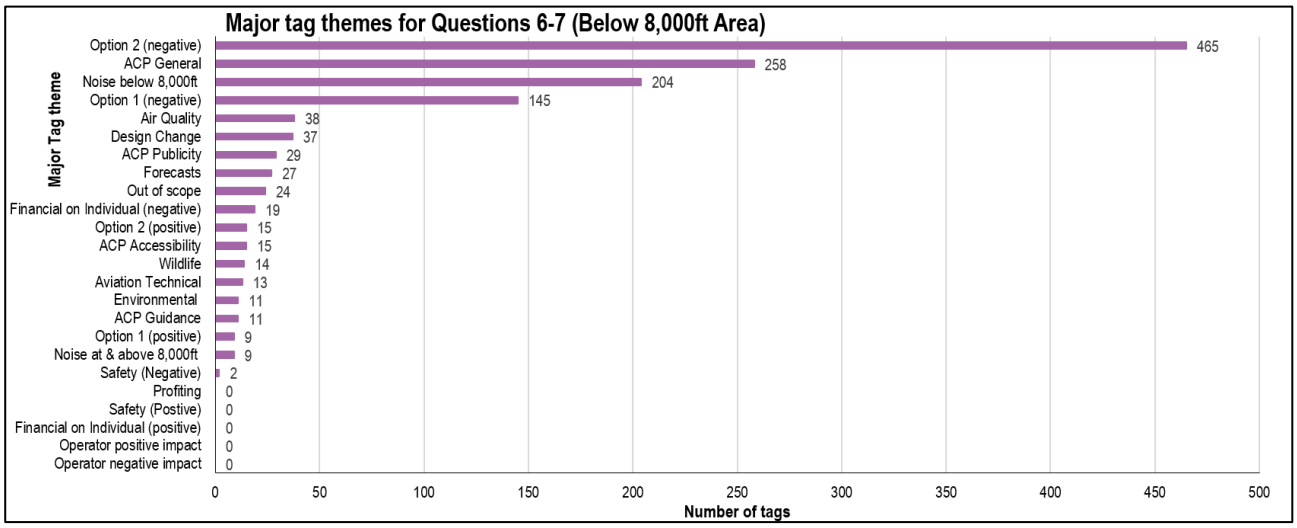


Figure 43 Below 8,000ft Area: Q6-Q7 Themes

11.4.1. Figure 43 illustrates and groups the major themes extracted from Q6-Q7 comments boxes during the tagging analysis. The following charts provide further analysis of the major themes with the greatest number of tags, in descending order, with Design Change included.

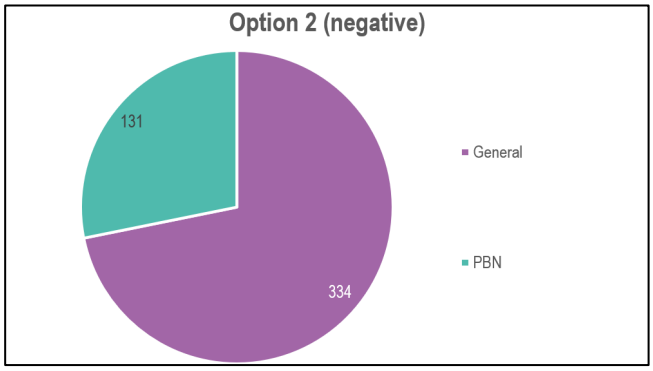


Figure 44 Sub-theme analysis: Option 2 (negative)

Narrative:

Proportionally, approximately ¼ of tags allocated to this theme concerned the negative aspects of the PBN concept with the remaining negative tags general in nature.

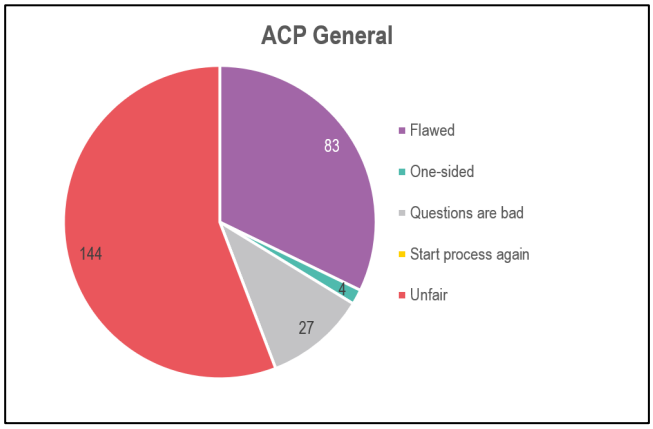


Figure 45 Sub-theme analysis: ACP General

Narrative:

This major theme continues to be dominated by comments tagged as Flawed and Unfair, similar to the equivalent charts elsewhere in this document.

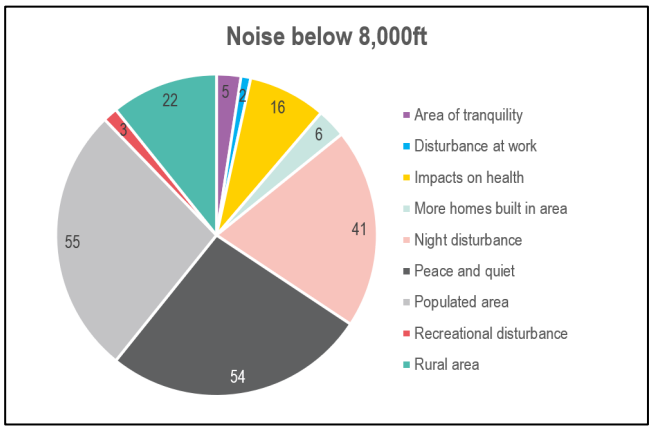


Figure 46 Sub-theme analysis: Noise Below 8,000ft

Narrative:

This theme provided useful information should Option 2 progress because, alongside the commonly-tagged Populated Area and Peace & Quiet, comments regarding Night Disturbance were this time tagged more frequently than the typically third-placed Rural Area. This is consistent with the Q7 numerical data at Figure 42 on p.37.

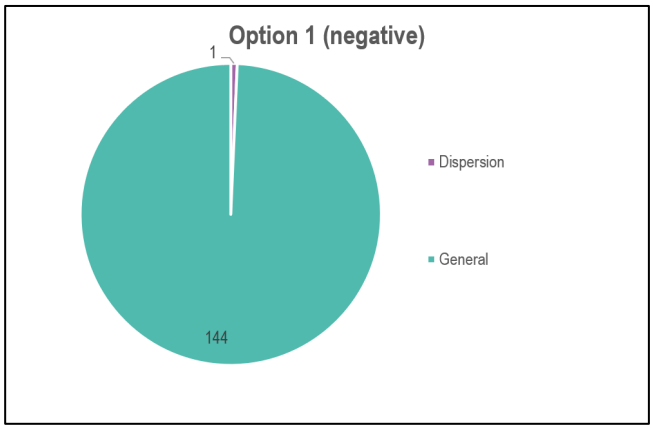


Figure 47 Sub-theme analysis: Option 1 (negative)

Narrative:

Given this question concerned Option 2, the general nature of Option 1 negative comments tagged here is consistent with pasting similar text comments from other areas of the survey without attempting to answer the specific questions asked.

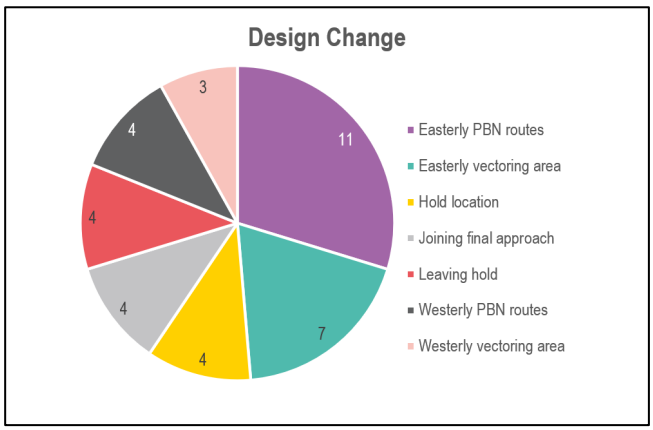


Figure 48 Sub-theme analysis: Design change

Narrative

Half the tagged comments for this sub-theme concerned Easterly operations, far more than for Westerly or other sub-themes.

11.5. Outside Overflight Area: Q6-Q7 Statistical Data

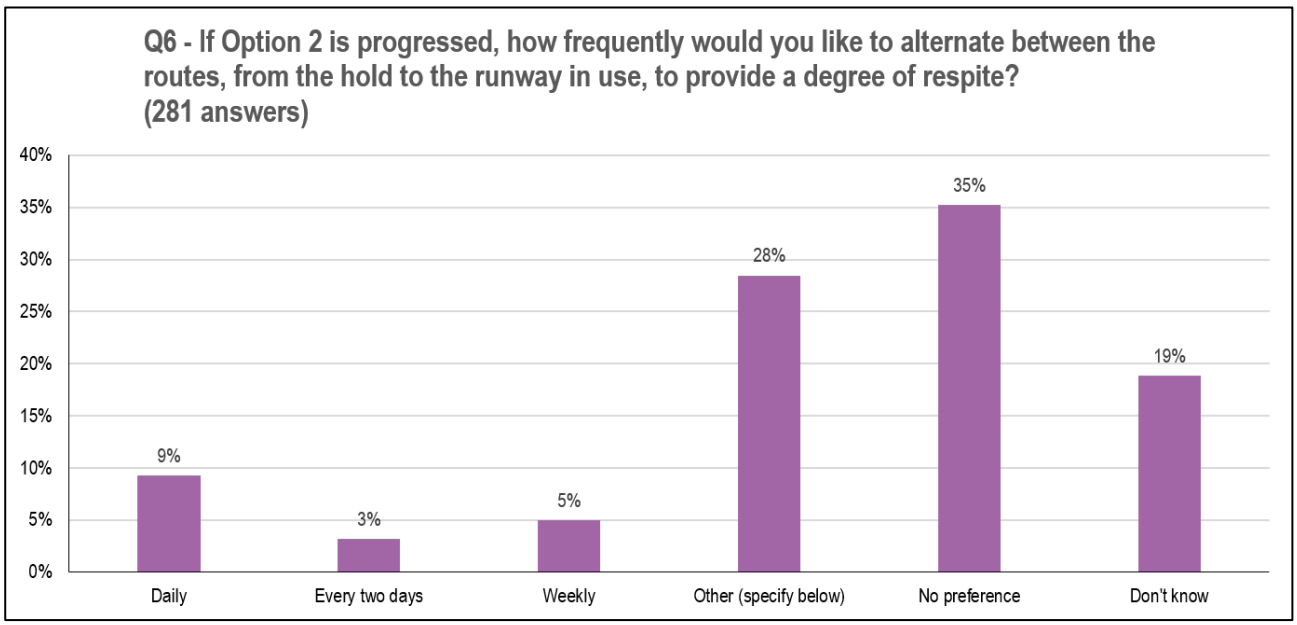


Figure 49 Outside Overflight Area: Q6 Statistical Data

The chart above illustrates that fewer than $^1/_5$ of respondents who answered this question in the Outside Overflight area chose one of the suggested alternation frequencies, with Daily being the most preferred. The Other (specify below) allowed for text entry, however this was generally used to provide feedback not relevant to this question.

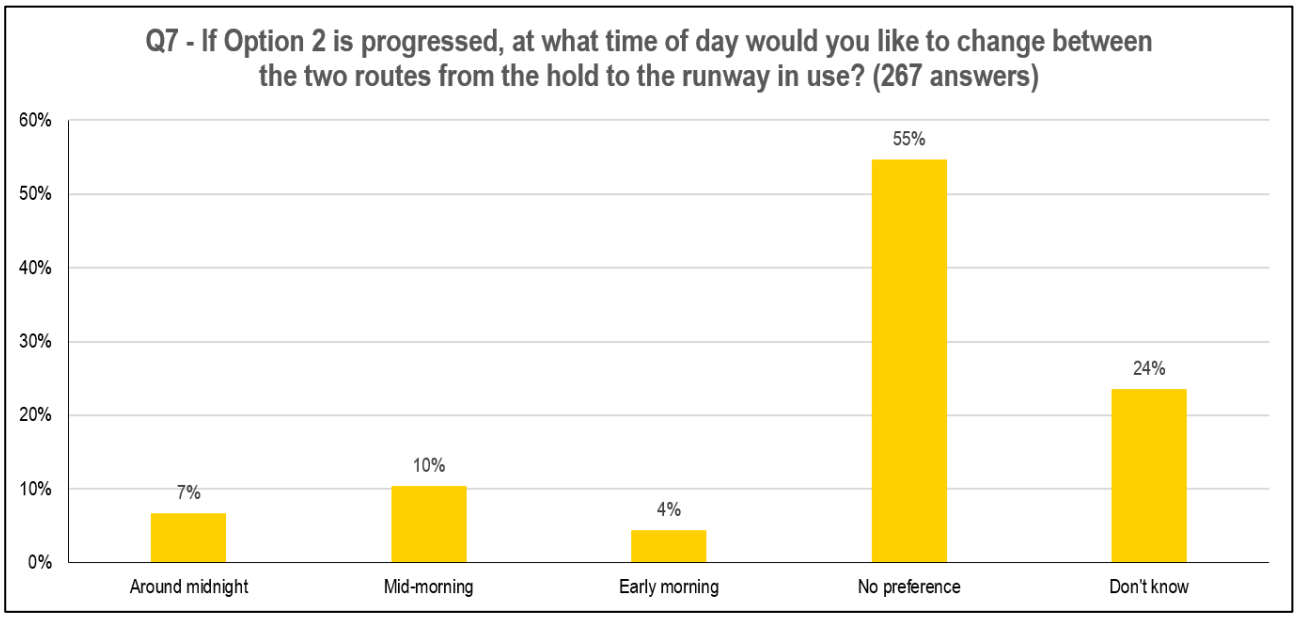


Figure 50 Outside Overflight Area: Q7 Statistical Data

The chart above illustrates that about $^1/_5$ of respondents who answered this question in the Outside Overflight area chose one of the suggested alternation frequencies, with Mid-morning being the most preferred.

Note: Option 2's PBN route alternation and timing would have no direct impact on respondents outside the overflight area.

11.6. Outside Overflight Area: Q6-Q7 Themes

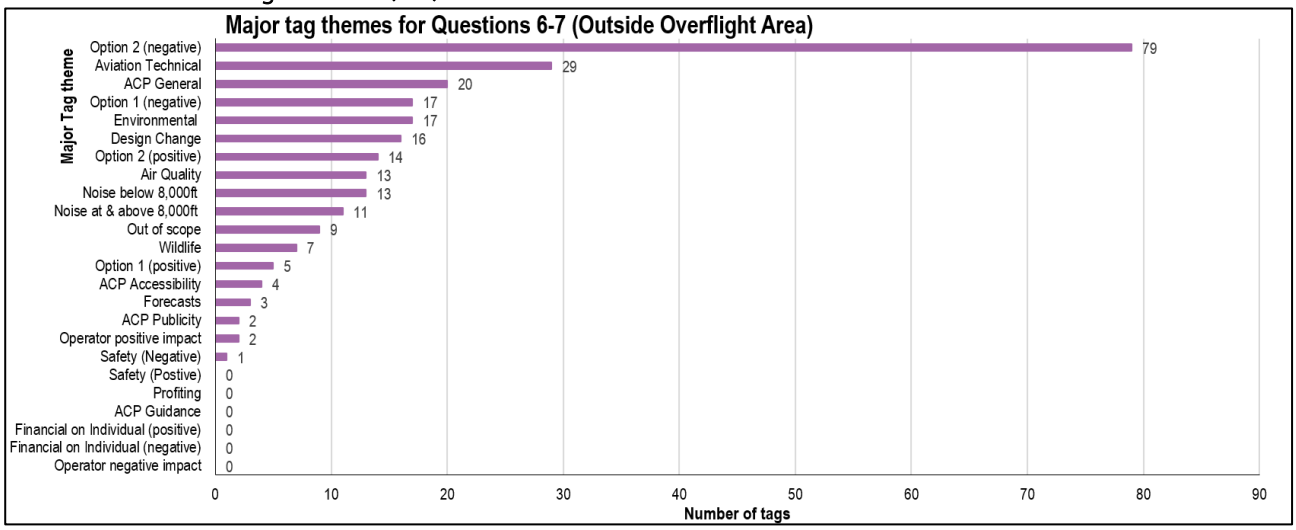


Figure 51 Outside Overflight Area: Q6-Q7 Themes

There were far fewer responses from respondents outside the overflight area, hence fewer tags were allocated. It would therefore not be proportional to present the in-depth sub-theme analysis for this much smaller dataset. This data has been considered as part of the review, has been analysed to the same depth, and is available for the CAA to review upon request.

11.7. Inferences drawn from this Section: Q6-Q7 Option 2 Route Alternation

For all three areas, there was a preference for daily alternation, mid-morning.

At & Above 8,000ft:

11.7.1. This area would not be directly impacted by route alternation regardless of frequency or timing. We infer that respondents intended to influence the behaviour of flights in a different area from where they live.

11.7.2. The comments received, and consequently the tags allocated to each theme and sub-theme, did not provide additional insight into, or context for, the Option 2 route alternation closed numerical questions.

Below 8,000ft:

11.7.3. This area would be most impacted by route alternation. We inferred that respondents sought to influence the behaviour of flights to their advantage.

11.7.4. Looking deeper into the Noise Below 8,000ft theme (Figure 46 on p.38), the Night Disturbance sub-theme was highlighted as a concern. We infer that asking these questions on frequency and timing triggered respondents to consider whether an overnight change in flightpath would be noticeable or disturbing, leading to this feedback.

11.7.5. The Design Change sub-themes had more tags relating to easterly operations, half as many as the total for the theme. We infer that there was more desire amongst this group of respondents to make changes to the proposed easterly operation than to change the westerly operation.

Outside the Overflight Area:

11.7.6. This area would not be directly impacted by route alternation regardless of frequency or timing. We infer that respondents sought to influence the behaviour of flights in a different area from where they live.

11.7.7. There was a preference for daily alternation, mid-morning.

11.7.8. The two top ranking major themes were Option 2 (Negative) and Aviation Technical. We infer that respondents from outside both consultation overflight areas had negative opinions on Option 2 and had Aviation Technical expertise. This could be consistent with a response campaign by members of the local gliding community living outside the consultation area, who perceived they would be negatively impacted by Option 2 due to an airspace consequence of the PBN routes underpinning that Option.

12. What did the responses say? Questions 8 and 9 Aviation Technical

12.1. This section summarises the results for Questions 8 and 9 which were questions targeted at airspace users with a technical understanding of airspace classifications. All responses to these questions were analysed together; they were not split into areas. The questions were:

8. What classification of airspace would you like the high level additional controlled airspace to the north of LLA to be?
9. To what extent would your flight operations be impacted by the proposed Class D airspace, which is required to contain the RNAV1 Transition to Runway 07 north of Leighton Buzzard (PBN Route 2)?

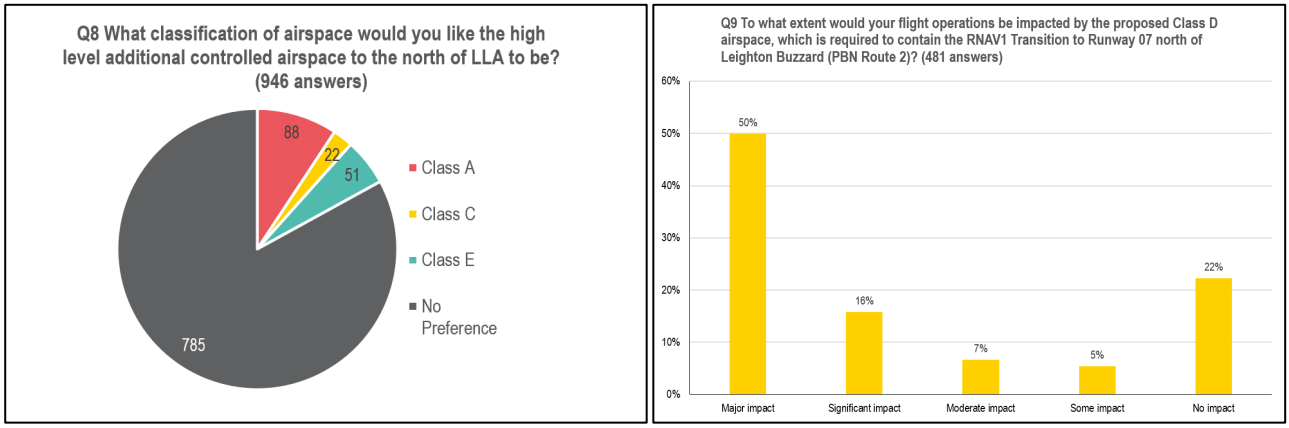


Figure 52 Q8-Q9 Statistical Data (all responses)

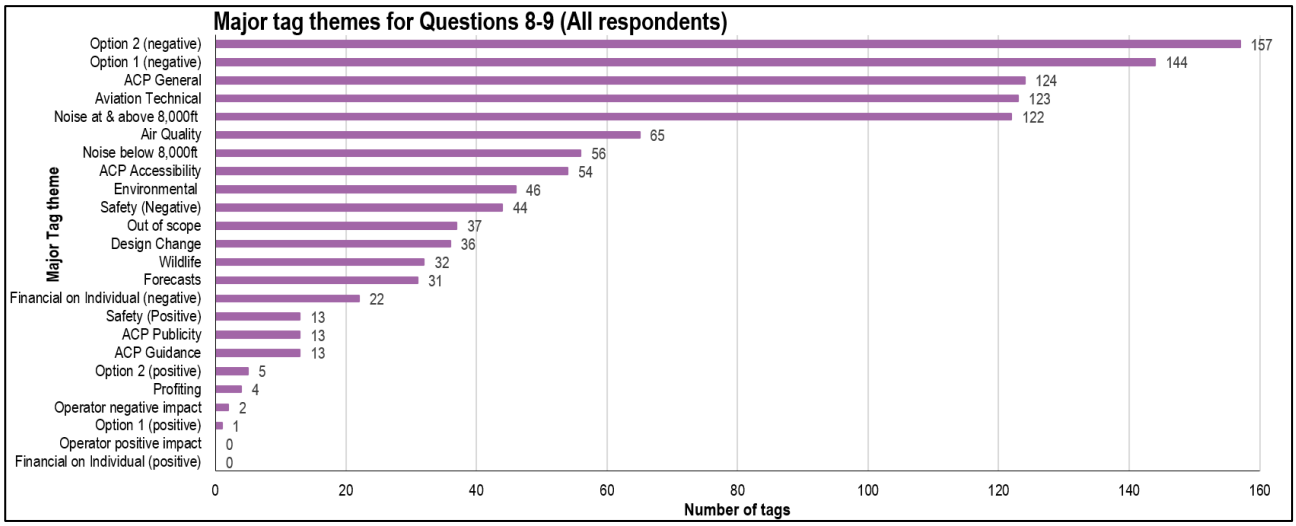


Figure 53 Q8-Q9 Major Themes (all responses)

12.2. Many non-aviator respondents answered these questions and supplied text comments. However, due to the technical nature of the questions and the desired technical information we needed to elicit, where a specific rational for a Class of airspace was provided, this was noted.

12.3. Comments tagged 'Glider Impact' dominated this theme, twice as common as other tags. 'GA Disbenefit' was the other main sub-theme. These two sub-tags formed 98% of this entire theme.

12.4. Inferences drawn from this Section: Q8-Q9 Aviation Technical

12.4.1. Some non-aviator responses to very technical aviation questions were used as an additional opportunity to give negative feedback. Most of the additional text comments had no actual relevance to the technical question being asked.

12.4.2. By far the largest number of responses to Q8 was 'No Preference'. Hence the majority do not have a preference for which classification of airspace would be introduced to the north of LLA.

12.4.3. The largest response to Q9 was 'Major Impact'. We infer that the greatest GA impact in this proposal would be due to the implementation of the airspace volume described in the question. We were also already aware of how this airspace volume was negatively viewed by the local gliding community, and these responses reinforce this objection to the new lower-altitude CAS.

13. What did the responses say? Question 10

13.1. This section summarises the results for Question 10. This was an open question designed to allow respondents to supply additional information, opinions, context or explanations about their earlier answers, or on any other relevant topic. All responses to these questions were analysed together; they were not split into areas.

The question was:

10. If you have any other comments you would like to make, please provide them here, you may upload a file if you wish.

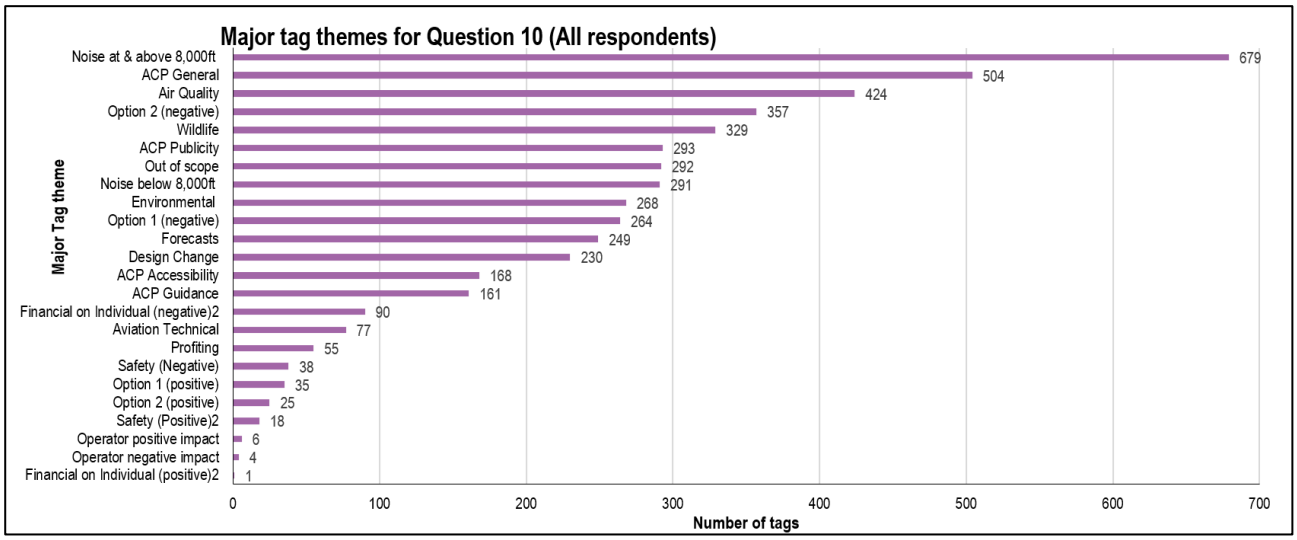


Figure 54 Question 10 Themes

13.2. Figure 54 illustrates and groups the major themes extracted from Q10 response area, including uploaded files, during the tagging analysis.

13.3. The following charts provide further analysis of the major themes with the greatest number of tags, in descending order. This time we are comparing them to the same tags from earlier questions in the survey. This helps us understand the similarities to, and differences from, how this general question was answered when compared with the earlier more specific questions.

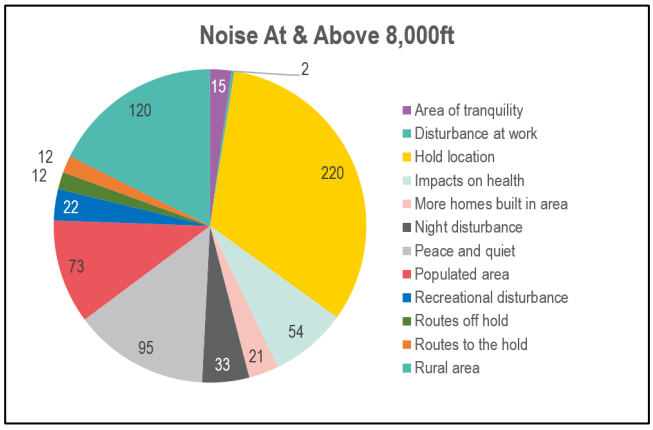


Figure 55 Sub-theme analysis: Noise At & Above 8,000ft

Narrative:

Comments tagged Hold Location consistently ranked highly in this major theme, which itself regularly ranks highly in answers to other questions.

Likewise comments tagged Rural area, Populated area and Peace & Quiet also consistently rank highly in this theme.

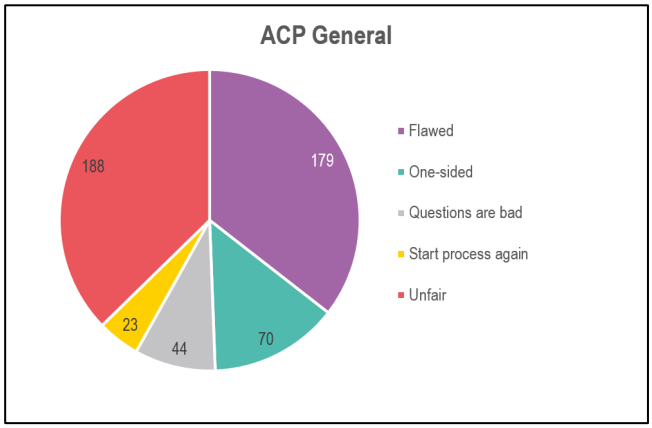


Figure 56 Sub-theme analysis: ACP General

Narrative:

Comments tagged Unfair and Flawed dominate this sub-theme, consistent with equivalent charts from other questions.

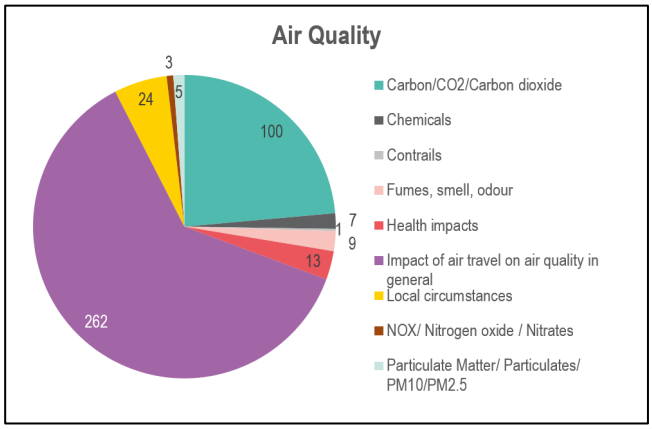


Figure 57 Sub-theme analysis: Air Quality

Narrative:

Comments tagged Impact of air travel on air quality in general dominate this sub-theme, which it does in equivalent charts from other questions, but under Q10 its proportion is reduced.

The second ranked tag of Carbon Dioxide has a much greater proportion in Q10 than the other Air Quality themed charts. This leads us to infer that more respondents chose this question to bring up the subject than when answering other questions.

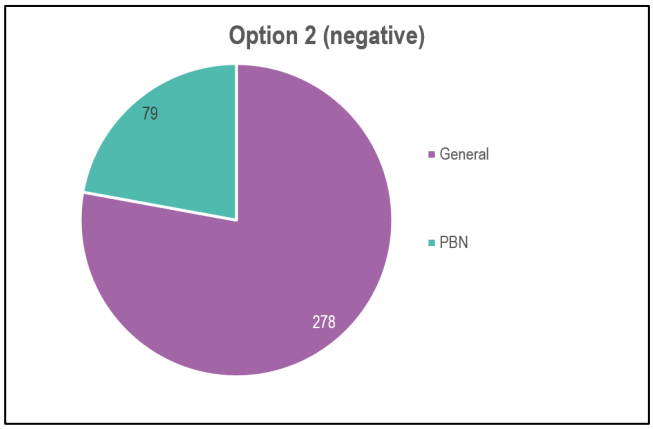


Figure 58 Sub-theme analysis: Option 2 (negative)

Narrative:

The pattern shown in this chart is common to other equivalent Option 2 (Negative) charts in this document with the exception of Figure 26 on p.30. That chart, summarising the analysis of Q1-Q5 comment tags in the Below 8,000ft area, was closer to 50/50, with tags allocated to PBN exceeding those for General negative impacts.

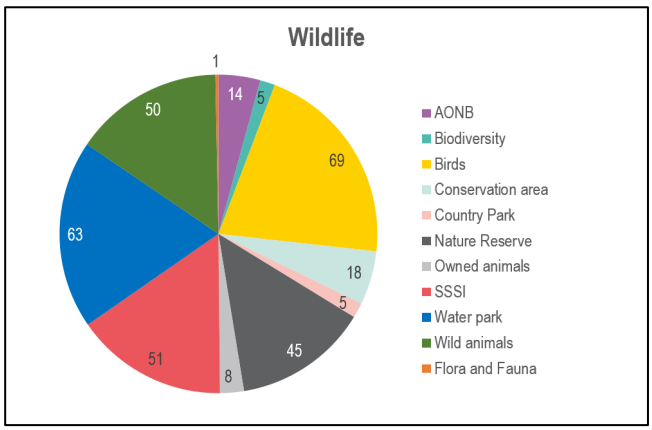


Figure 59 Sub-theme analysis: Wildlife

Narrative:

The other chart displaying the Wildlife sub-theme results in this document is Figure 18 on p.27, for Q1-Q5 in the At & Above 8,000ft area. Both charts have similar apportionments of tags allocated to Birds, Water Park, SSSI, Wild Animals and Nature Reserve.

Other charts on the theme of wildlife in the wider analysis (not presented in this document but available for CAA review) tend to be similarly proportioned.

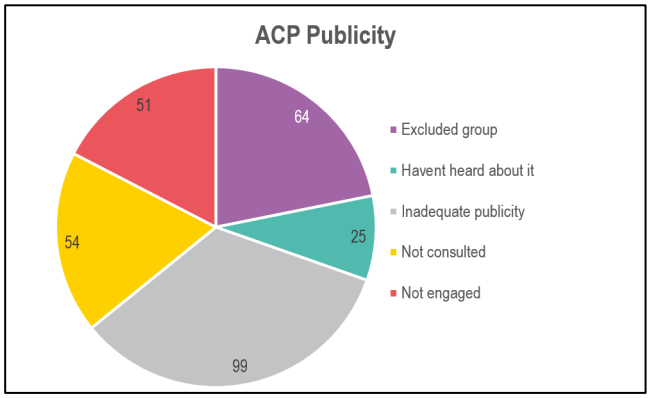


Figure 60 Sub-theme analysis: ACP Publicity

Narrative:

Comments with tags allocated in this theme for Q10 tended to be similarly allocated for the Q10 charts in the three areas At & Above 8,000ft, Below 8,000ft and Out of Overflight area.

However, the proportions of the pie chart tended to be dominated by 'Not Consulted' when studying the grouped questions Q1-Q5, Q6-Q7 and Q8-Q9.

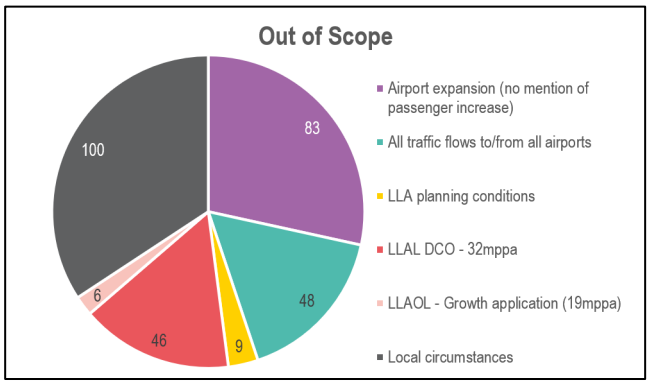


Figure 61 Sub-theme analysis: Out of Scope

Narrative:

The other chart displaying the Out of Scope sub-theme results in this document is Figure 19 on p.28, for Q1-Q5 in the At & Above 8,000ft area. They are quite different, with tags allocated to Local Circumstances dominating that chart but around one third of this chart.

The other main difference includes a greater allocation of tags on LLA's DCO here, compared with a very small proportion on the other chart.

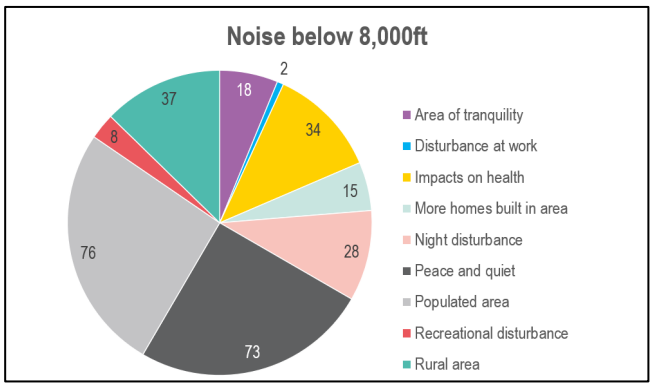


Figure 62 Sub-theme analysis: Noise Below 8,000ft

Narrative:

The layout of this chart is generally consistent with the equivalent tags and sub-themes in the other charts of this theme. The main difference is Figure 46 on p.38, wherein there is a greater proportion of tags associated with Night Disturbance.

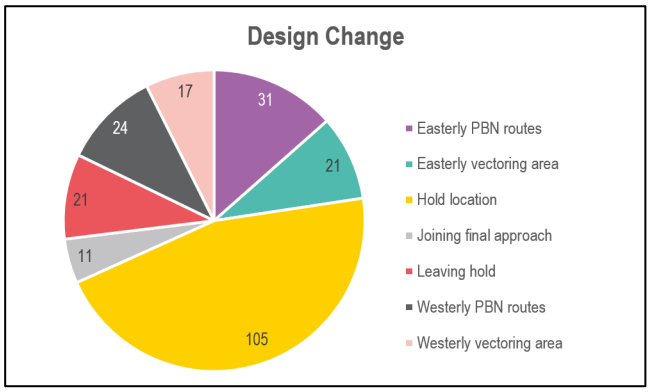


Figure 63 Sub-theme analysis: Design Change

Narrative:

This theme's sub-themes changed noticeably depending on which area was being considered.

Considering the At & Above 8,000ft area, Hold Location totally dominated every question grouping.

In the Below 8,000ft area, there was a more even spread of recommendations.

Outside the overflight area, the dominating sub-theme was Easterly PBN routes.

13.4. This catch-all Q10 allowed us to analyse uploaded files and larger pieces of text. It also allowed us to compare and contrast how feedback comments changed through the survey process, and gave context when the data was divided up for analysis. In some cases, we inferred that themes were relatively consistent throughout, in others there were marked differences based on the respondents' area.

14. Aviation Technical Response Focus

From an aviation technical point of view, apart from the overriding requirement to improve the air safety of the region, we must consider the potential impacts on other airspace users such as the military, local airports, aircraft operators (airlines and business jet operators), and other airspace users such as General Aviation (GA).

As per our Consultation Strategy document (Ref 10), we engaged representative aviation organisations, including member organisations of the National Air Traffic Management Advisory Committee (NATMAC).

As representative organisations of *bona fide* users of the airspace, we are required by the airspace change process CAP1616 (Ref 11) to ensure this group of stakeholders' technical concerns are considered.

This section necessarily uses aviation technical language, with brief explanations where appropriate.

14.1. Military air traffic operations

14.1.1. Our primary engagement efforts were with the Defence Airspace and Air Traffic Management unit (DAATM), the Ministry of Defence's (MoD) department responsible for assessing airspace change impacts on all MoD operations.

14.1.2. For this proposal, we were given permission by DAATM to engage directly with the United States Air Force in Europe (USAFE) bases at RAF Lakenheath and RAF Mildenhall (both northeast of Newmarket). These USAFE bases are close together and operate as a single air traffic control unit.

We also engaged with RAF Wittering (northwest of Peterborough), and RAF Swanwick (military controllers operating in the same room as civilian controllers).

We held extensive engagement sessions noted in Stage 2 documentation (Ref 5), pre-consultation as noted in the Consultation Document (Ref 8), and webinars during the consultation leading to a formal response (link to MoD response).

This response contained objections to potential impacts due to the planned airspace change if it were to go ahead without negotiation, collaboration and mutual understanding. However, it did not state a preference for Option 1 or Option 2.

14.1.3. The three areas of USAFE concern were:

- F35 practice flameouts (PFOs) to RAF Lakenheath's easterly runway, the requirement for 10,000ft AMSL/10nm descent is extremely adjacent or inside CAS Area 4 under certain scenarios;
- CAS joins and departures via BKY being pushed further north; and
- USAFE holding patterns outside CAS adjacent to CAS Area 1 above FL70.

These three items were, essentially, conditional objections. This means that the USAFE objection would be removed should negotiations succeed on suitable mutually agreed operational working practices that sufficiently mitigate these impacts.

14.1.4. RAF Wittering's concern was about Areas 1 and 2, due to their regular training sorties in the vicinity and semi-regular need to climb above FL75.

Like USAFE above, RAF Wittering's objection would be removed should negotiations succeed on suitable mutually agreed operational working practices that sufficiently mitigate these impacts.

14.1.5. RAF Swanwick did not object to the proposal, however they stated there would need to be revised coordination and redefinition of an airspace element known as the Daventry (DTY) Radar Corridor. The DTY Radar Corridor is a long-established procedure allowing a simple way for military aircraft to cross perpendicular to the major civilian north/south air traffic flows that make up the air traffic 'spine' of England. This proposal would require a slight widening of that corridor, with associated procedural negotiations.

14.2. London Stansted Airport

14.2.1. We held an engagement session with London Stansted Airport's airspace representative during the consultation. This led to Stansted's response (link) which was that they preferred Option 2 over Option 1, primarily because Option 2 more closely aligns with the AMS (Ref 14).

14.2.2. Their response was also clear that the region around both airports is complex, and that shared holding is sub-optimal in a modern airspace network.

14.2.3. Stansted explained that they support this change because it benefits their operation through reduced complexity and delay at network level. We infer this would provide a safety improvement due to reduced complexity.

14.2.4. Stansted also stated that neither Option would cause negative impacts to their operations, and that Class C airspace was their preference.

14.3. Cambridge Airport

14.3.1. We held an engagement session with Cambridge Airport in advance of the consultation as part of the Stage 2 options development (Ref 5), and also a direct telephone engagement during the consultation period.

14.3.2. This led to Cambridge Airport's response (link) which was that they had no preference for Option 1 or Option 2. Their response discussed RAF Lakenheath and Mildenhall, separately considered earlier in this section. It also discusses gliding operations (considered separately later in this section) and vintage aircraft operating out of the Imperial War Museum Duxford (Duxford aerodrome was contacted as part of the consultation, but did not respond).

14.3.3. Cambridge Airport stated that the routes from the south and east may give rise to label clutter (where the radar displays multiple radar contacts and their label data overlaps, making it harder to read). It also discussed the possibility that some IFR pilots may request to remain inside CAS for longer, and that they would prefer Class E airspace.

14.4. London Heathrow Airport

14.4.1. Heathrow Airport Ltd's response (link) preferred Option 2, as it is a more modern air traffic control concept and is more aligned with the AMS (Ref 14).

14.4.2. Their response discussed alignment with the AMS (Ref 14), network airspace capacity, and the potential to realise (and to future-proof) environmental benefits via the Future Airspace Implementation Strategy South (FASI-S).

14.4.3. They also considered and supported the concept of Flexible Use Airspace (FUA) CAS Area 6 provided it can be operated safely.

14.5. Cranfield Airport, and the National Flying Laboratory Cranfield (NFLC)

14.5.1. We held engagement sessions with Cranfield Airport in advance of the consultation as part of the Stage 2 options development (Ref 5), and a joint engagement session with NFLC during the consultation period.

14.5.2. This led to Cranfield Airport's response (link) and to NFLC's response (link).

14.5.3. Cranfield Airport stated that Area 6 may cause an additional restriction to procedural instrument training patterns for Runway 21, and that they prefer Option 1 because Area 6 is not required under that Option. They also stated that the CAS required for the proposed hold (Areas 1, 2 and 3) could impact locally based aircraft, with NFLC making a separate submission.

14.5.4. NFLC explained some of their typical flying classroom airspace requirements. They also explained that the impacts of this proposal could partially be mitigated by allowing NFLC to access the CAS areas via Letter of Agreement, as well as increasing the CAS base and moving the hold eastwards. NFLC had no preference regarding Option 1 vs. Option 2.

14.6. Aircraft operators: Airlines, executive jets and the British Airline Pilots' Association

14.6.1. Three airlines operating at LLA responded to this consultation: EasyJet (link), TUi (link) and Ryanair (link) which operates at both LLA and Stansted.

One airline (Jet2), operating at Stansted but not LLA, also responded (link).

Three executive jet operators at LLA responded: NetJets (link), London Executive Aviation Lux UK (link) and Signature (link).

14.6.2. Q1-Q5 Option Preference: Most operators (5 of 7) agreed that either Option would be an acceptable solution, with 2 disagreeing.

Most operators (5 of 7) expressed a preference for Option 2 in order to exploit the modern technology already employed in most aircraft. One had no preference, with the other stating that Option 1 would have greater flexibility. Predictability and reduced complexity, enhancing safety, were also relevant factors.

14.6.3. Q6-Q7 Option 2 Route Alternation: There was no preference expressed by any of the air operators. However, a common technical theme emerged: that the specific route in use should be issued to the pilot as early as possible. This would improve flight deck predictability, give them time to prepare the aircraft's Flight Management Computer (FMC), with no more than one change per day.

14.6.4. Q8-Q9 Aviation Technical: Most operators (5 of 7) preferred Class A, the most stringent of airspace classifications. One had no preference, and one stated Class C or higher.

Most operators (5 of 6, one chose not to answer) replied that CAS Area 6 would have no impact on their operations, with one claiming a moderate impact. We infer this response was linked to their preference for Option 1.

14.6.5. Q10 Other comments: Two responses concerned fuel use, with one explicitly disappointed that the proposal would cause negative fuel impacts and associated carbon disbenefits. Others included the desire for aircraft speeds to be managed via Continuous Descent Approaches (CDA), where speed limits should be designed to minimise fuel use and reduce ground noise impacts due to idling engines. There was also reiteration that, should Option 2 progress, the specific route in use should be issued in a timely fashion to enable safe programming and crosschecking of the aircraft's systems.

The operator using Stansted supported the proposal and asks that any negative impact on departures be mitigated.

14.6.6. BALPA's response (link) preferred Option 2 to make the best use of aircraft technology, and supported the proposal in general due to the separation of holding areas with the increased predictability and consistency this would enable.

14.7. General Aviation: Gliding Community

14.7.1. We held engagement sessions with both the national British Gliding Association and the local London Gliding Club in advance of the consultation as part of the Stage 2 options development (Ref 5), and a direct engagement session during the consultation period.

14.7.2. During the engagement sessions, we asked both organisations to encourage their members to respond.

14.7.3. This led to BGA's response (link) and LGC's response (link), as well as c.60 responses from individual members of the latter organisation emphasising their opposition to the CAS fillet described in Question 9 of the survey.

14.7.4. Both organisations provided qualified support for this proposal's Option 1, accepting the logic that separation of arrival flows reduces complexity and enhances safety. Both also responded that an unmodified Option 2 could cause significant impacts to gliding operations (including 'land-out' safety concerns), but that the impact of CAS Areas 1-5 would have minimal impact FL75 and above. This was consistent with the individual responses from club members.

14.7.5. Both suggested modifications to Option 2 which would either not require CAS Area 6, or would limit CAS Area 6's use to night-time only (with gliders using that volume daytimes).

14.7.6. The responses from individual members of LGC reflected LGC's response, amplifying its effectiveness.

14.8. General Aviation: Airspace4All

14.8.1. We held engagement sessions with Airspace4All in advance of the consultation as part of the Stage 2 options development (Ref 5), and a direct engagement session during the consultation period.

14.8.2. This led to A4A's response (link). A4A generally objects to this proposal. Their response indicates a mixed preference for Option 2 westerly due to greater alignment with the AMS (Ref 14), and Option 2 not being preferred under easterly conditions due to its requirement for CAS Area 6. The CAS volumes being removed under this proposal, southeast of Stansted, were welcomed but also considered a potential distraction.

14.9. General Aviation: British Balloon and Airship Club

14.9.1. The BBAC's response (link) preferred Option 2, and if it were progressed, would recommend daily route alternation around midnight.

14.10. General Aviation: Airfield Operators Group

14.10.1. AOG's response (link) had no preference regarding the Options, and expected minimal potential impact on airspace users.

14.11. General Aviation: East Anglian Rocketry Society

14.11.1. We held engagement sessions with EARS in advance of the consultation as part of the Stage 2 options development (Ref 5), and a direct engagement session during the consultation period.

14.11.2. This led to EARS' response (link) which had no preference regarding the Options. Their primary concern was their continued ability to launch high power rockets up to 10,400ft AMSL, albeit launches above 5,000ft are unusual and above 7,500ft rare. The proposed CAS Area 2, base FL75 (c.7,500ft AMSL depending on local air pressure) has the potential to prevent EARS high power launches.

14.11.3. EARS' response is a conditional objection which would be removed should negotiations succeed on suitable mutually agreed operational working practices that sufficiently mitigate these impacts.

14.12. General Aviation: British Skydiving and Little Staughton Drop Zone LSDZ

14.12.1. We held engagement sessions with British Skydiving, and their representative who is progressing a proposed Drop Zone in the vicinity of Little Staughton, Cambridgeshire on behalf of a client. These sessions were carried out as part of the Stage 2 options development (Ref 5), and a direct engagement session during the consultation period.

14.12.2. This led to BSD's response on behalf of LSDZ (link). Should LSDZ progress with its own CAP1616 airspace change process, further engagement and formal consultation with NATS (driven by LSDZ) would be required as part of that process. At that point, further discussions re: LSDZ accessing CAS volumes could occur.

14.13. Inferences drawn from this Aviation Technical Section:

14.13.1. We infer that several airspace users would withdraw their objections subject to ongoing negotiations regarding suitable mutually agreed operational working practices that sufficiently mitigate the impacts caused by this proposal.

14.13.2. We infer that the concept of separating LLA arrivals from the shared Stansted flows is considered logical and safe by local airports, with some differing views on the specifics.

14.13.3. We infer that commercial aircraft operators using the region's airspace consider the proposed change logical and safe. Most would prefer Option 2 because it exploits the extant technology with which most commercial aircraft are equipped. Option 1 was also considered an acceptable solution by majority. Commercial operators also had concerns about negative fuel/CO_2 impacts; one was explicitly disappointed in potential disbenefits.

14.13.4. We infer that the greatest perceived impact for most GA airspace users, especially the local gliding community, would be the establishment of CAS Area 6. Their preference for Option 1 is based primarily on the fact that CAS Area 6 is not required, however there were suggestions for a modified version of Option 2 where that impact could be mitigated. We also infer that the higher level proposed CAS of Areas 1-5 is not generally considered impactful to the GA community (see earlier mention of negotiating agreed operational working practices to mitigate impacts).

14.13.5. We were surprised that the proposed release of CAS southeast of Stansted did not draw a significant response from the GA community, as we expected it to be broadly welcomed and commented upon. We were not expecting it to be considered a distraction from the main proposal's aims.

This concludes the analysis sections of the Step 3D document.

15. How do we decide which themes may impact the final proposal, and which would not?

15.1. The analysis of responses and categorisation of results has revealed 19 major themes with 117 sub-themes, and is described in Sections 9-14 above.

15.2. The inferences we have drawn in each section of the analysis allow us to understand and articulate the response themes. Alphabetically, the 19 major response themes are listed below. We concluded ten themes **in bold** may impact the final proposals:

ACP Accessibility	**Aircraft Operator Impact**	Forecasts	Out of scope
ACP General	**Aviation Technical**	**Noise at & above 8,000ft**	Profiting
ACP Guidance	**Design Change**	**Noise below 8,000ft**	**Safety Impact**
ACP Publicity	**Environmental Impacts**	**Option 1 Impact**	Wildlife Impact
Air Quality	Financial Impact	**Option 2 Impact**	

15.3. **Response themes which may impact final proposals**

(Where there is clearly an influential overlap between themes and/or sub-themes, we have included them **in bold** also.)

15.3.1. **Noise At & Above 8,000ft**

Relevant Government guidance (ANG2017, Ref 15) has altitude based priorities that can be summarised by the statement: 'From 7,000ft upwards the minimising of CO_2 emissions is of greater priority than minimising noise'.

We made very clear in the consultation materials, public engagement sessions and FAQs that existing airspace flows constrain the general location of the hold, the general flows to the hold, and those leaving the hold towards the runway. We were also clear that we would follow the altitude based priorities as per the guidance, but that we would listen to responses from all respondents in all locations under changing flightpaths at all altitudes.

We inferred from the analysis that potential noise impact at upper altitudes was important to these respondents, primarily driven by the sub-theme **Hold Location**.

Given the quantity and quality of responses and suggestions received, we will progress this theme to Step 4A for further consideration.

15.3.2. **Noise Below 8,000ft, Option 1 Impact** and **Option 2 Impact**

The altitude based priorities of Government guidance (ANG2017, Ref 15) can be summarised by two statements:

'Between 4,000ft-7,000ft minimising the impact of aviation noise should be prioritised unless this disproportionately increases CO_2 emissions'.

'Below 4,000ft the impact of aviation noise should be prioritised, with preference given to options which are most consistent with existing arrangements'.

We inferred from the analysis that the first theme is inextricably linked to respondents' preference for **Option 1** or **Option 2**, with those impacts analysed in their namesake themes.

Given the quantity and quality of responses and suggestions, Option 1 was clearly preferred by stakeholders on the ground beneath the proposed changes. Therefore we will progress these themes to Step 4A for further consideration.

15.3.3. **Aviation Technical**, **Aircraft Operators** and **Aviation Safety**

Inferences drawn from the **Aviation Technical** Response Focus mean that the GA community (the local gliding community in particular) prefer **Option 1**.

Aircraft Operators preferred Option 2 however most found Option 1 an acceptable solution.

Aviation Safety was inferred from comments that the separation of arrival flows would decrease complexity in the region, and also that there could be negative impacts on GA should CAS Area 6 progress under an unmodified **Option 2**.

Therefore we will progress these themes to Step 4A for further consideration.

15.3.4. Air Quality and Environmental Impacts

These two themes include the sub-themes of the Impact of Air Travel on Air Quality in General, Carbon Dioxide, Climate Change, Greenhouse Gas and Global Warming, all of which were inferred to be important issues due to the quantity and quality of responses.
Also, Aircraft Operator impacts mentioned increased fuel use as a cost disbenefit, from which also comes increased Carbon Dioxide and Greenhouse Gas emissions. Therefore we will progress these themes to Step 4A for further consideration.

15.3.5. Design Change

This theme is separate from the others and includes suggestions and recommendations. See paragraphs 8.9-8.11on p. 22 for details.

15.4. Response themes which would not impact final proposals

15.4.1. Themes relating to the administration, process compliance, and conduct of the consultation (ACP Accessibility, ACP General, ACP Guidance, ACP Publicity and Forecasts) would not impact the final proposals because they do not contain new information or ideas that could lead to an adaptation of an airspace design option. For example, a common response thread was that this was not a consultation at all because we were not consulting on 'no-change', or the hold location, therefore the outcome was predetermined. We made very clear in the consultation materials, public engagement sessions and FAQs that existing airspace flows constrain the general location of the hold, the general flows to the hold, and those leaving the hold towards the runway. We were also clear that previous documentation had studied the no-change scenario and other hold locations, and that these alternate upper designs were not safe to progress, hence were discarded at Stage 2 (Refs 5, 6, 7).
However, these themes do contain insights into how the airspace change process and consultation are perceived, which can inform future airspace change engagements.

15.4.2. Response comments making up the Financial Impact theme would not contain new suggestions or recommendations that could lead to amending either design, or to the creation of a new design. The Financial Impact theme was dominated by the sub-theme Property Value Decrease, Compensation, and Forced to Move House, for reasons of noise. Themes on the subject of noise are already progressing to Step 4A as noted above in paragraphs 15.3.1 (Noise At & Above 8,000ft) and 15.3.2 (Noise Below 8,000ft, Option 1 and Option 2).

15.4.3. Themes relating to Out of Scope subjects would not impact the final proposals because they do not contain new information or ideas that could lead to an adaptation of an airspace design option. For example, several responses related to Local Circumstances such as noise from nearby roads. Other responses erroneously conflated LLAL's ongoing work for a Development Consent Order DCO as the reason for this proposal, and started their objection accordingly. However we explained in the consultation material, public engagement sessions and FAQs that this proposal was required to resolve the region's complexity and latent safety reduction for when traffic recovers to and grows beyond pre-pandemic levels with or without LLAL's DCO. We also explained that the materials had necessarily taken account of both scenarios – without DCO and with DCO – and we had provided appropriate data for both.

15.4.4. Response comments about LLA, NATS, Airlines (or all three) Profiting from this proposal do not contain new suggestions or recommendations that could lead to amending either design, or to the creation of a new design.

15.4.5. Response comments relating to Wildlife do not contain new information or ideas that could lead to adapting either design option. The responses varied from comments on Wild Animals, Owned Animals (for example, from representatives of the local horse racing industry), Conservation Areas, Chilterns Area of Outstanding Natural Beauty (AONB) and Birds. The CAP1616 process (Ref 11) states that airspace change proposals are unlikely to have an impact upon biodiversity because they do not involve ground based infrastructure changes. It would be erroneous of respondents to conflate this proposal with LLAL's DCO (which, if progressed, would require infrastructure changes and associated environmental reports under its own entirely separate process).

16. Summary list of actions for Step 4A which may impact the final proposal

16.1. Consider how the design may be adapted to minimise noise impacts at & above 8,000ft, with attention given to the hold.

16.2. Consider how the design may be adapted to minimise noise impacts below 8,000ft, including choosing between Option 1 and Option 2.

16.3. Consider how the design may be adapted to minimise any increase in the use of aviation fuel as part of the complexity-reducing, safety-enhancing primary aim of this proposal, consequently minimising increases in greenhouse gas emissions and costs for aircraft operators.

16.4. Consider how the design may be adapted to minimise impacts on other airspace users, by reducing the requirement for controlled airspace while still enhancing safety, and by agreeing operational practices to mitigate airspace access impacts.

16.5. Consider the specific design change suggestions and recommendations received, decide to what extent those suggestions could be achieved (from fully to partially), and explain why.

17. Conclusion, and what happens next

17.1. The consultation successfully engaged stakeholders at a formative stage of the proposal. It used innovative methods during the challenging conditions of an ongoing pandemic to provide stakeholders with sufficient reasons for their intelligent consideration. We provided adequate time for that consideration, and we have explained how the product of this consultation will be taken into account at the next step 4A.

17.2. Our use of a Virtual Exhibition, and multiple online webinar video meetings, was successful. We believe that, had we relied on more traditional village hall / roadshow types of engagement, we would have received fewer responses and would not have been able to reach as far as we did.

17.3. The airspace change process requirement summarised in CAP1616 Edition 4 Table C2 (see Figure 4 on p.6 for copy) has been met, because each response has been heard, understood and classified by analysing each answer component, then by organising and amalgamating those components into response themes and sub-themes as described in this document.

17.4. We drew conclusions from those themes and explained how we categorised them.

17.5. Next we will thoroughly review the themes which may lead to a change in the proposed design and consider whether each item will or will not lead to an actual change – reasons will be provided either way, and the output will become the second consultation feedback report. We will also publish the revised final design, and complete a final options appraisal based on that revised design.

17.6. These documents comprise Step 4A of the CAP1616 process – and address the 'we did…' part of the 'we asked, you said, we did' consultation report document set. Step 4A will be followed by the formal application for an airspace change proposal under Step 4B.

17.7. Subject to CAA regulatory approval, the proposal is planned for implementation in February 2022.

Annex A. Consultation Data and Evidence

This annex is a summary of the communications and engagement exercises held during the consultation period. It includes performance statistics and other data.

Intro: The ACP background

Who and where?

NATS and London Luton Airport (LLA) are joint sponsors of the Swanwick Airspace Improvement Plan (SAIP) Airspace Deployment 6 (AD6). It proposes removing the dependency of Luton arrivals on Stansted arrivals in Essex airspace.

Why?

This will reduce the complexity of flights and in turn reduce air traffic controller workload, assuring a safe and efficient operation for the future.

What?

The proposed changes affect lower level airspace, hence this is a Level 1 airspace change. Requirements set out in the CAA's CAP1616 dictate that stakeholder engagement and public consultation must be carried out, and should also be supported by a significant communications campaign to make people aware and encourage responses.

When?

The consultation started on Monday, 19 October 2020 and ran for more than 15 weeks, closing on 5 February 2021.

Summary - Campaign by numbers

London Luton Airport NATS

Earned media

17.6m reached

Number of editorial articles: 56

Social media

1.02m impressions

Total link clicks: 11k
Total posts: 45
Men 25-34 indexed highest
4.2% average engagement rate

Political

20 MPs contacted
15 actively engaged

Attended virtual round tables: 9
1-2-1 briefings held: 5
MP consultation responses: 4

Webinars

28 webinars hosted

Public sign ups: 86
GA sign ups: 44
Local Govt. sign ups: 24

Websites

NATS launch blog: 9,261 views

LLA AD6 website: 6,564 views

Citizen Space: 14.5k views
(one month data missing)

Consultation responses

2,446 responses received

Virtual exhibition

11,231 visitors

2m33s per visit
90% new visitors
50% accessed via mobile
Even age spread
Videos and postcode lookup popular

Digitally excluded

2,500 leaflets distributed

55 organisations engaged
24 local print adverts placed
6 paper consultations requested
4 paper responses received

Summary - Outputs, outtakes, outcomes

Exposure **Outputs**	Engagement **Outtakes**	Result **Outcomes**
Three press releases issued to the media.	Reach of 17.6 million people in the affected areas through a mix of TV, radio, newspapers and online coverage.	The media campaign generated widespread awareness driving over 2000 people to the virtual exhibition to find out more. Figure obtained from VE Google Analytics - actual figure likely to be higher.
45 social media posts with a supportive paid campaign targeted by demographic and location.	1.02m total impressions and 11k link clicks sparking significant social conversation.	A highly targeted and optimised digital campaign made the information more relevant to more people with Facebook being the top driver of traffic overall to the virtual exhibition (2,278). A noticeable majority of younger demographics (25-34) were driven to consultation material as a result.
The virtual exhibition was built in-house providing an experiential platform for users to engage with tailored content in a package specifically designed with a low barrier to entry in mind.	Over 11k users accessed the virtual exhibition, 22% of whom went on to submit a response to the consultation. An average of over 100 users per day throughout the consultation window.	A cumulative total of 572 hours were spent in the virtual exhibition, with an average of 2m33s per user. The postcode lookup function allowed people to work out their own factor of change and was used over 18k times.
Digitally excluded - 2,500 leaflets were distributed, 24 local print adverts were placed and 55 gatekeeper organisations were contacted.	Reach of over 300k through a significant advertising campaign. Six paper copies of the consultation were requested.	Four paper responses to the consultation were made.
20 MPs contacted with pre-briefings.	15 MPs responded leading to three virtual round tables and five private virtual meetings.	Some MPs used their channels to communicate the consultation to their constituents. Four MPs responded to the consultation.
10 public webinars held on Teams or Teams Live. 18 webinars held for other stakeholders.	84 public sign-ups with a 50% no-show. 44 GA webinar sign-ups and very good levels of engagement at webinars from other stakeholders. Recordings of the webinars put online were watched by 162 people.	Public sign-up numbers were generally lower than expected despite significant promotion; this may be due to the effectiveness of the virtual exhibition providing enough detail for most. The direct two-way engagement in webinars worked well with the ultra-engaged. Difficult questions were answered openly and transparently. Anecdotal feedback from those that did attend was positive.
Other content created: Postcode look-up function, two design option videos, introduction to AD6 video and an explainer hold infographic.	Over 26k video views on LLA channels. The postcode lookup function allowed people to work out their own factor of change and was used over 18k times.	Making a complex topic easier to digest and more relevant allowed the public to gain personalised understanding in a relatable way. The content worked hard across all our channels and acted as an effective shop window into a very detailed consultation document.

In detail: Consultation performance

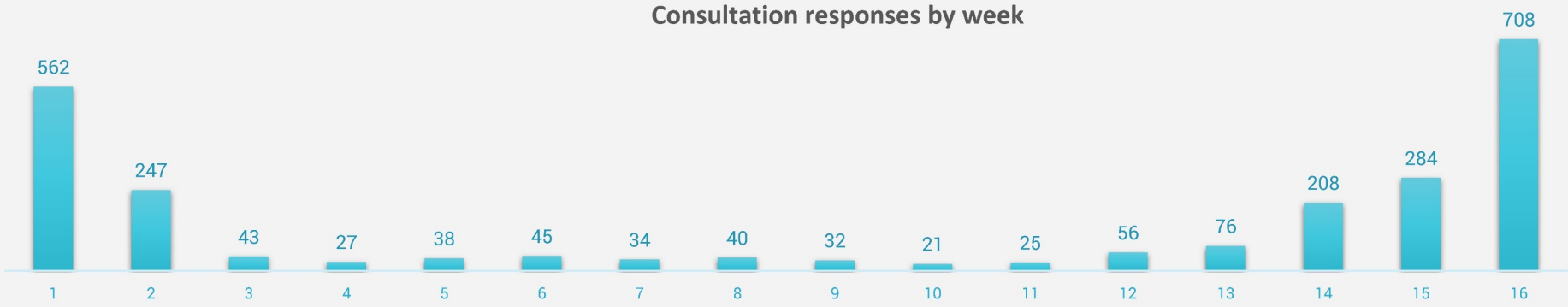
Launch week and the final reminder comms were effective in helping convert directly to response submission; they added encouragement given that these times tend to be when most responses are made to consultations. Despite reaching over 6.5m people our midpoint activity saw no obvious increase in consultation responses. This could be due to the midpoint falling over the Christmas period around week 10. On the whole, responses were made through Citizen Space with six paper copies of the consultation requested.

Key highlights:

Total responses: 2,446
- 6 paper copies of consultation requested and 4 submitted

22% conversion from virtual exhibition users to responses received

Primary themes:
-Hold
-Air quality
-Airspace change



NB the statistical data in this slide includes duplicate responses that had yet to be identified.

In detail: Media coverage – at a glance

Our media strategy divided the consultation into 3 key editorial moments: consultation launch, midpoint and final opportunity to respond

Launch – 19 Oct 20

Reach: 10.52m
Print and online : 9 publications
Broadcast: 25 pieces
Trade: 1 publication

Luton Today | The Luton News Herald & Post

Bishop's Stortford Independent

heart

Dunstable Today | Dunstable Gazette Herald & Post

Midpoint – 14 Dec 20

Reach: 6.52m
Print and online: 11 publications
Broadcast: 1 exclusive interview
Trade: 2 publications

The Hunts Post
We put your questions on proposed holding stack to airport and aviation officials

Leighton Buzzard Observer

FLYER Pilot Britain's best-selling GA magazine

Bedford Today

Biggleswade Chronicle

Final opportunity – 18 Jan 21

Reach: 602k
Print and online: 5 publications
Broadcast: 2 pieces

Not long left to respond to Huntingdonshire flight path plans

Royston Crow

Leighton Buzzard Observer

BBC RADIO Cambridgeshire

BBC RADIO Three Counties

The Herts ADVERTISER

Combined reach:
17.6m
(approximate)

In detail: The digital divide

We were acutely aware that while a digital approach would work for many, for some it would not. Social restrictions on traditional methods of engagement would not help this. Hearing from the digitally excluded and seldom heard population affected by this airspace change was a central part of our approach and accounted for the majority of our budget. Aside from the targeted local media engagement which ensured we had a baseline of awareness, we also committed to the following…

Contacted 55 digitally excluded and seldom heard (local and regional) gatekeeper organisations with the offer of leaflets and paper copies of the consultation materials

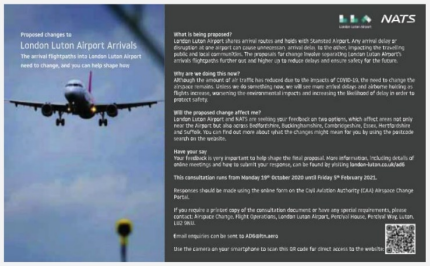
24 print ads run

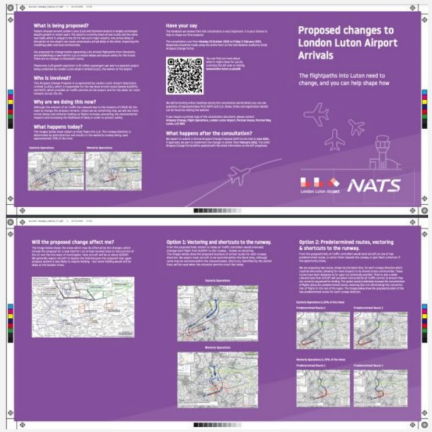
327,906
Reached through community magazines delivered directly through people's doors and local newspapers

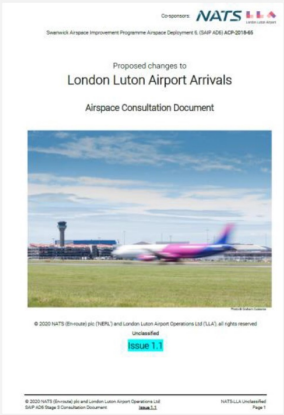
2,500
Leaflets distributed to organisations and individuals, including MPs

6
Paper copies of the consultation requested

- ✓ Elderly groups
- ✓ Disability groups
- ✓ Ethnic minority groups
- ✓ Community groups
- ✓ Libraries







In detail: MP engagement

Our approach to MPs began before the consultation window to ensure they were pre-briefed. MPs were targeted based on their constituency's relevance to the ACP shown in the map below. Across the duration of the consultation they were regularly fed information, invited to webinar sessions and sent packs of leaflets to distribute, resulting in 4 MPs providing a response to the consultation. Some also shared their views on social media.

A total of 20 MPs contacted

15 MPs responded or engaged

3 'virtual roundtables' took place with MPs across the affected areas attended by 9 MPs

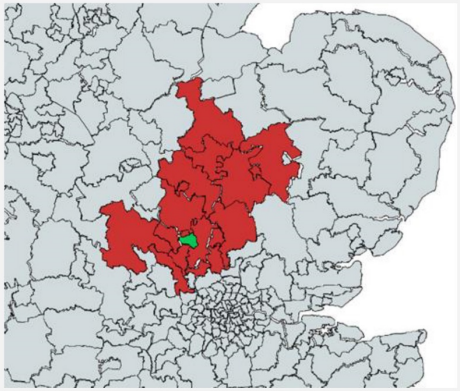
5 private 1-2-1 meetings took place with MPs.

4 email briefings to all 20 MPs at key moments

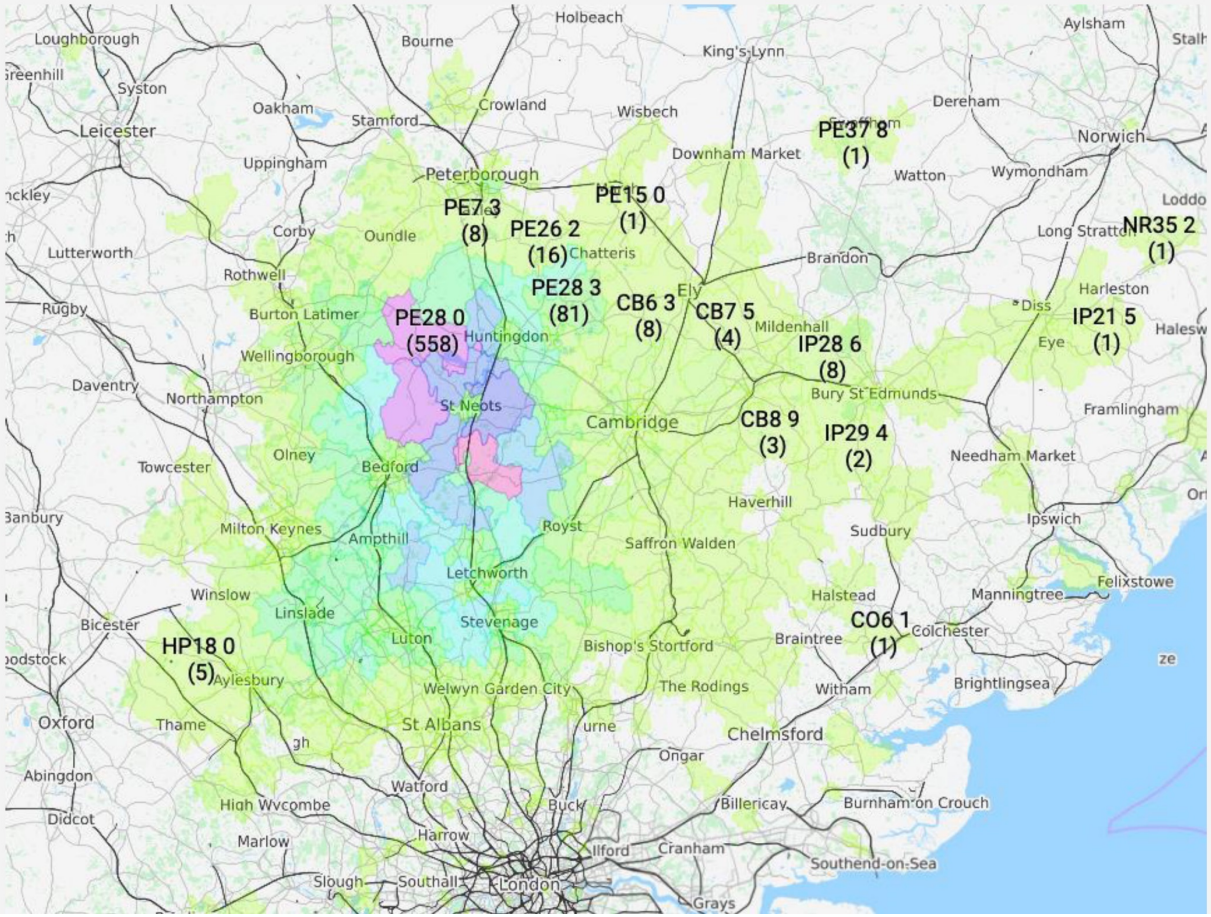
Physical packs of leaflets and a cover letter sent to all 20 MPs

A total of 4 consultation responses from MPs

3 webinars with representatives of Local Governments attended by 24 councillors, officers and representatives



In detail: Virtual exhibition - postcode look-up



Number of postcodes looked up: 18,811

Our top performing modal within the virtual exhibition was the postcode look-up function. This took significant development but was well worth the effort, allowing the public to understand at the click of a button whether or not the proposal would mean any noticeable change for their area.

PE280BJ

Higher altitude over 8000ft

Negative change - Effects likely to be noticeable. This postcode is within the region where changes to London Luton Airport arrivals are expected, noticeably increasing impacts such as noise. Please read the consultation document, especially sections 1 to 6.

* This statement is intended to illustrate the degree of flightpath change based on the postcode entered, if the proposed airspace changes were implemented. This tool was refined to provide improved accuracy in mid-December 2020; if you have used this tool previously then there is a very small chance today's results may differ to those previously output. The results are not definitive and should only act as a guide – we recommend reading the abridged or the full length consultation document sections 1-6 for full details of the proposal and its potential impacts in your area.

Annex B. Digitally Excluded and Seldom Heard Audience Groups

B.1. The Consultation Strategy document (Ref 10) paragraphs 9.6 and 9.7 contained a table explaining how we would attempt to engage with umbrella organisations, to offer online or paper information such as leaflets to promote awareness. The following table lists the organisations we attempted to contact, and is in addition to the list of stakeholders from the Consultation Strategy Annex A (Ref 10).
NB wherever email addresses or contact forms could be found on websites, organisations were provided details of the consultation at least once.

Audience Group type	Name of organisation	Location	Two-way contact at least once?
Organisations supporting older people	Age UK (Beds)	Bedfordshire	Yes
	Royal British Legion	Beds & Herts	Yes
	Age Concern	Luton	Yes
	Bedford Caribbean Senior Citizens Association	Bedford	Yes
	Leighton Linslade Senior Citizens Association	Leighton Linslade	Yes
	North Herts 50 Plus	North Herts	No
	Age UK (Herts)	Hertfordshire	No
	Oakley Rural Day Centre	Bedford	No
Organisations supporting people with a disability	Families United Network	Bedfordshire	Yes
	Social Interest Group	Luton	Yes
	Bedfordshire ME support group	Bedfordshire	Yes
	Bedfordshire opportunities for learning difficulties	Bedfordshire	Yes
	Disability Resource Centre	Bedfordshire	Yes
	Luton & Dunstable Hospital Radio	Luton & Dunstable	Yes
	Motor Neurone Disease Association - Luton	Luton & South Beds Branch	Yes
	Motor Neurone Disease Association - North Beds	North Bedfordshire	Yes
	Multiple Sclerosis Society – Bedford	Bedford	Yes
	Multiple Sclerosis Society - Leighton Buzzard	Leighton Buzzard & District	Yes
	Ability Net	(National organisation)	Yes
	Headway Luton	Luton	No
	Bedford Cerebral Palsy Society	Bedford & District	No
	Lifegeta Emotional Support Group	Hitchin (Hertfordshire)	No
	Stroke Association	Central Bedfordshire	No
Organisations supporting ethnic minorities	Luton Irish Forum	Luton	Yes
	Luton Roma Trust	Luton	No
	Luton Council of Faiths	Luton	No
	Polish British Integration Centre	Bedford	No
Other support organisations	Citizens Advice Ampthill	Ampthill	Yes
	Citizens Advice Biggleswade	Biggleswade	Yes
	Citizens Advice Dunstable	Dunstable & District	Yes
	Bedfordshire & Luton Community Foundation	Luton	Yes
	Community Voluntary Service	Bedfordshire	Yes
	Beacon Villages Community Library	Ivinghoe	Yes
	Herts Help	Hertfordshire	Yes
	Luton Access	Luton	No
	Virtual Library	Bedfordshire	No
	Citizens Advice Luton	Luton	No
	Citizens Advice Leighton-Linslade	Leighton-Linslade & District	No
	Luton Adult Learning	Luton	No
	Bedfordshire Rural Communities Charity	Bedfordshire	No
	Community Action Bedfordshire	Bedfordshire	No
	Love Luton	Luton	No
	Beds & Cambs Rural Support Group	Beds & Cambs	No

Table 2 List of Support Organisations where we attempted engagement

B.2. Libraries

Typically, under non-pandemic situations with no social distancing restrictions, we would contact local libraries and request they hold copies of the Consultation Document (Ref 8) and a batch of leaflets.

We did engage several local libraries to make this request, but were not successful as libraries were generally closed during the pandemic due to lockdown and the subsequent English 4-tier system, thus the public could not have made use of the facility.

Annex C. List of Tags for Major Themes and Sub-themes

The following tables list the tags used to analyse the 'open' text comments for each of the 10 survey questions.

Primary Theme	Sub-Theme Tag
ACP Accessibility	Documents are confusing
	Documents do not contain adequate data
	Documents too complex or too technical
	Documents too long
ACP General	Flawed / justification
	One-sided
	Questions are bad
	Start process again
	Unfair
ACP Guidance	Democracy implication
	Illegal
	Not following Government's Air Navigation Guidance
	Not following CAA's process CAP1616
	Not following the Gunning principles of consultation
	Not following other guidance
ACP Publicity	Excluded group
	Haven't heard about it
	Inadequate publicity
	Not consulted
	Not engaged
Air Quality	Carbon / CO_2 / Carbon Dioxide
	Chemicals / Fuel dumping
	Contrails
	Fumes, smell, odour
	Health impacts
	Impact of air travel on air quality in general
	Local circumstances
	NOX/ Nitrogen oxide / Nitrates
	Particulate Matter / Particulates / PM10/ PM2.5
Aviation Technical	Design criteria
	General Aviation disbenefit
	Glider impact
	Other London airport routes
Design Change	Easterly PBN routes
	Easterly vectoring area
	Hold location
	Joining final approach
	Leaving the hold
	Westerly PBN routes
	Westerly vectoring area
Environmental Impacts	Carbon neutral target by 2050
	Climate Change
	Global Warming
	Greenhouse gas
	Light pollution
	Paris agreement
	Visual pollution in area

Primary Theme (continued)	Sub-Theme Tag (continued)
Financial Impacts (negative)	Compensation
	Forced to move house
	Noise Insulation
	Property value decrease
	Unemployment of individual
Financial on individual (positive)	New employment of individual
Forecasts	COVID-19 impact
	Future airspace change
	Proportionality
Aircraft Operator Impact (negative)	Additional track miles
	Fuel disbenefit
Aircraft Operator Impact (positive)	Less delay
	Pilot workload
	Systemised airspace
Noise at & above 8,000ft	Area of tranquillity
	Disturbance at work
	Hold location
	Impact on health
	More homes built in area
	Night disturbance
	Peace and quiet
	Populated area
	Recreational disturbance
	Routes leaving the hold
	Routes towards the hold
	Rural area
Noise below 8,000ft	Area of tranquillity
	Disturbance at work
	Impacts on health
	More homes built in area
	Night disturbance
	Peace and quiet
	Populated area
	Recreational disturbance
	Rural area
Option 1 (positive)	Dispersion
	General
Option 1 (negative)	Dispersion
	General
Option 2 (positive)	Dispersion
	General
Option 2 (negative)	Dispersion
	General
Out of scope	Airport Expansion - no mention of passenger increase
	All other air traffic flows to/from all airports
	LLA planning conditions
	LLAL DCO - 32mppa
	LLAOL - Growth application (19mppa)
	Local circumstances
Profiting	Airlines
	Commercial gain
	LLA
	NATS

Primary Theme (continued)	Sub-Theme Tag (continued)
Safety Impact (negative)	Airline operator
	Public
	General aviation
Safety Impact (positive)	Airline operator
	Public
	General aviation
Wildlife Impact	AONB (Area of Outstanding Natural Beauty)
	Biodiversity
	Birds
	Conservation area
	Country Park
	Flora and Fauna
	Nature Reserve
	Owned animals
	SSSI (Site of Special Scientific Interest)
	Water Park
	Wild animals

Table 3 List of Primary Themes and Sub-Theme Tags

Annex D. List of 77 Response Reference Codes not published

As per paragraph 7.2 on p.20, of the 2,426 responses analysed, 2,349 were published on the CAA's Citizen Space consultation website (link[7] to published responses webpage)

This list gives the reference codes of the remaining 77 that could not be published.

All respondents were sent an automatic acknowledgement containing such a reference code.

Response Reference Code	Date and Time Submitted
ANON-SJ4M-9HBK-C	2020-10-19 18:15:56
ANON-SJ4M-9HBX-S	2020-10-19 18:26:44
ANON-SJ4M-9HB9-T	2020-10-19 18:27:55
ANON-SJ4M-9HBR-K	2020-10-19 19:17:47
ANON-SJ4M-9H74-A	2020-10-19 19:58:46
ANON-SJ4M-9H7A-Q	2020-10-19 20:27:42
ANON-SJ4M-9H7X-E	2020-10-19 20:38:43
ANON-SJ4M-9H7B-R	2020-10-19 20:58:10
ANON-SJ4M-9HU1-5	2020-10-20 06:37:41
ANON-SJ4M-9HU3-7	2020-10-20 07:29:53
ANON-SJ4M-9HU5-9	2020-10-20 08:22:55
ANON-SJ4M-9HUB-P	2020-10-20 08:24:03
ANON-SJ4M-9HUY-D	2020-10-20 09:09:34
ANON-SJ4M-9HDP-K	2020-10-20 09:16:39
ANON-SJ4M-9HDC-6	2020-10-20 09:52:02
ANON-SJ4M-9HDB-5	2020-10-20 10:11:49
ANON-SJ4M-9HAR-J	2020-10-20 11:46:33
ANON-SJ4M-9HAV-P	2020-10-20 11:53:44
ANON-SJ4M-9HPP-Y	2020-10-20 12:21:47
ANON-SJ4M-9HPK-T	2020-10-20 12:55:07
ANON-SJ4M-9HPB-H	2020-10-20 13:16:50
ANON-SJ4M-9HZX-H	2020-10-20 13:58:22
ANON-SJ4M-9HZ9-J	2020-10-20 13:58:36
ANON-SJ4M-9HZD-W	2020-10-20 14:01:24
ANON-SJ4M-9HQD-M	2020-10-20 16:05:45
ANON-SJ4M-9HQE-N	2020-10-20 16:39:58
ANON-SJ4M-9HV1-6	2020-10-20 18:01:27
ANON-SJ4M-9HVV-B	2020-10-20 18:51:17
ANON-SJ4M-9HG1-Q	2020-10-20 20:24:18
ANON-SJ4M-9HG2-R	2020-10-20 20:56:17
ANON-SJ4M-9HG6-V	2020-10-20 21:02:56
ANON-SJ4M-9HX1-8	2020-10-20 21:46:06
ANON-SJ4M-9HX3-A	2020-10-20 22:24:06
ANON-SJ4M-9HS4-6	2020-10-20 23:16:51
ANON-SJ4M-9HS9-B	2020-10-21 07:59:54
ANON-SJ4M-9HSV-8	2020-10-21 08:46:31
ANON-SJ4M-9H5A-N	2020-10-21 10:35:29
ANON-SJ4M-9H5J-X	2020-10-21 13:21:26
ANON-SJ4M-9H5V-A	2020-10-21 13:37:31
ANON-SJ4M-9H58-C	2020-10-21 14:57:03
ANON-SJ4M-9HWF-V	2020-10-21 18:13:15
ANON-SJ4M-9HWJ-Z	2020-10-21 18:48:45
ANON-SJ4M-9HYS-B	2020-10-21 22:00:10
ANON-SJ4M-9HYG-Y	2020-10-21 22:51:52
ANON-SJ4M-9HYY-H	2020-10-22 13:30:55
ANON-SJ4M-9HJU-X	2020-10-22 13:55:34
ANON-SJ4M-9HJ4-W	2020-10-22 14:42:56
ANON-SJ4M-9HJZ-3	2020-10-22 18:41:32
ANON-SJ4M-9HJN-Q	2020-10-22 21:10:32
ANON-SJ4M-9HJC-C	2020-10-22 21:27:28
ANON-SJ4M-9HJR-U	2020-10-22 22:11:50
ANON-SJ4M-9HJ5-X	2020-10-22 22:25:10
ANON-SJ4M-9HTH-U	2020-10-23 07:41:59
ANON-SJ4M-9HTX-B	2020-10-23 14:27:20
ANON-SJ4M-9HHK-J	2020-10-24 19:53:24
ANON-SJ4M-9HH9-Z	2020-10-25 06:32:40
ANON-SJ4M-9HHJ-H	2020-10-25 13:58:28
ANON-SJ4M-9HHE-C	2020-10-26 01:22:43
ANON-SJ4M-9HE1-N	2020-10-27 08:12:34
ANON-SJ4M-9HEB-6	2020-10-27 10:45:33
ANON-SJ4M-9HEY-W	2020-10-27 14:27:13
ANON-SJ4M-9H9B-T	2020-10-28 07:43:06
ANON-SJ4M-9H97-F	2020-10-28 07:48:17
ANON-SJ4M-9H4F-S	2020-10-28 08:14:58
ANON-SJ4M-9HN4-1	2020-10-28 08:39:07
ANON-SJ4M-9HN1-X	2020-10-28 08:52:54
ANON-SJ4M-9HNF-K	2020-10-28 09:09:32
ANON-SJ4M-9HNE-J	2020-10-28 09:40:55
ANON-SJ4M-9HM1-W	2020-10-28 12:00:45
ANON-SJ4M-9HM5-1	2020-10-28 14:18:21
ANON-SJ4M-9HMT-Z	2020-10-28 14:30:51
ANON-SJ4M-9HMY-5	2020-10-28 14:47:31
ANON-SJ4M-9H8W-E	2020-10-28 17:02:00
ANON-SJ4M-9H88-F	2020-10-28 18:51:46
ANON-SJ4M-9H2U-6	2020-10-28 20:42:44
ANON-SJ4M-9H22-3	2020-10-29 08:33:47
ANON-SJ4M-9H26-7	2020-10-29 12:12:56

Table 4 List of 77 Response Reference Codes for responses not published

(NB these reference codes are not 'searchable' using the keyword search function within the CAA's website, this is a functionality issue over which we have no control)

End of document

[7] Full URL is https://consultations.airspacechange.co.uk/london-luton-airport/ad6_luton_arrivals/consultation/published_select_respondent