

CAA Consultation Assessment

Title of airspace change proposal	Land's End Transit Corridor
Change Sponsor	Land's End Airport
Project Reference	ACP-2019-75
SARG Lead	[REDACTED]
Case study commencement date	10 May 2021
Case study report as at	17 June 2021
<p><i>Instructions</i></p> <p>In providing a response for each question, please ensure that the 'status' column is completed using the following options:</p> <ul style="list-style-type: none"> • YES • NO • PARTIALLY • N/A <p>To aid the SARG Lead it may be useful that each question is also highlighted accordingly to illustrate what is:</p> <p>resolved YES not resolved PARTIALLY not compliant NO</p>	
<p>Executive Summary</p> <p>The change sponsor proposed introducing for all users an improved airspace solution to an established block of airspace linking Land's End Airport to the Isles of Scilly known as the Land's End Transit Corridor (LETC) that could provide mitigation to the current unknown traffic environment. The Corridor is situated within Class G airspace and within the Royal Naval Air Station (RNAS) Culdrose Area of Intense Aerial Activity (AIAA) The need for an airspace change was identified as a result of an increase in air traffic movements within the LETC, the commencement of a second commercial operator and the introduction of multiple Instrument Flight Rules (IFR) approaches. This airspace change was categorised as a level 2C change. The proposal was not related to stimulating new traffic or altering any existing routes.</p> <p>A targeted consultation was conducted over 10-weeks with the change sponsor presenting option 4, a combined Radio Mandatory Zone/Transponder Mandatory Zone (RMZ/TMZ) together with an alteration to the size of the corridor as their preferred option. Sixty-three responses were received. The change sponsor's original final proposal was their preferred option 4. A subsequent revision was made to their final proposal to make it a reclassification of the LETC as an RMZ together with an alteration to the size and refining the shape of the corridor (original consultation option 3). The new airspace would be known as the Land's End RMZ (LRMZ). This revision to the nature of the proposal is reflected in updated stage 4 documentation submitted to the CAA.</p>	

PART A – Summary of Airspace Change Process to date		
A.1	Airspace change proposal public view Land's End Airport ACP 2019-75	
A.2	Stage 1 DEFINE Gateway	YES
A.2.1	The required documentation was presented on time and we were satisfied that the change sponsor had met the requirements of the Process up to that point. Progress to the next Step of the Process was therefore approved.	
A.3	Stage 2 DEVELOP & ASSESS Gateway	YES
A.2.1	The required documentation was presented on time and we were satisfied that the change sponsor had met the requirements of the Process up to that point. Progress to the next Step of the Process was therefore approved.	
A.3	Stage 3 CONSULT Gateway	YES
A.3.2	The required documentation was presented on time and we were satisfied that the change sponsor had met the requirements of the Process up to that point. Progress to the next Step of the Process was therefore approved.	
A.4	Stage 4 UPDATE & SUBMIT	YES
A.4.1	The change sponsor formally submitted their proposal, which included all of the required documentation.	
PART B – Consultation Assessment		
B.1	AUDIENCE	
B.1.1	Did the consultation target the right audience?	YES
	<p>The change sponsor's consultation targeted a range of stakeholders including those affected by current airport operations and those that could be affected by any changes associated with an airspace change proposal, even though the change sponsor expected any changes to have negligible impact, together with those who may have non-aviation opinions to share. The change sponsor stated that they used previous airspace change proposal engagement experience to assist with their selection. Stakeholders included aviation users, representatives of the general aviation community and local councils. Even though no change to environmental impact was anticipated, two environmental groups were targeted. Within this overall group of 63 stakeholders the change sponsor identified 14 key stakeholders that they actively sought responses from in order to maximise participation in the consultation.</p> <p>The stakeholders included:</p> <ul style="list-style-type: none"> - 14 key stakeholders including: RNAS Culdrose, Tresco and Penzance Heliports, St.Mary's and Newquay Cornwall Airports, Isles of Scilly Skybus, Perranporth Flying Club, Cloud 9 Hang Gliding and Paragliding Association, Natural England and the Environment Agency 	

	<ul style="list-style-type: none"> - 35 groups and national aviation organisations represented on the National Air Traffic Management Advisory Committee (NATMAC) including the Ministry of Defence (MoD) Defence Airspace and Air Traffic Management (DAATM), NATS and the British Gliding Association - Cornwall Council, St Just Town Council and the Constituency MP - The National Trust and the Duchy of Cornwall <p>The change sponsor included a full list of stakeholders consulted with at Appendix B of ACP-2019-75 Land's End Airport Stage 4 Step 4B Airspace Change Proposal v2.docx. Whilst the consultation was targeted at those users of the airspace and other stakeholders for whom the proposals were most relevant, it was conducted on the CAA's public facing citizen space platform and so all stakeholders had the opportunity to respond. In their consultation document, the change sponsor stated that they welcomed feedback from any interested parties.</p>								
B.1.2	Please provide a summary of responses below								
	<p>The change sponsor received 63 responses of which 44 were submitted via the online citizen space portal and 19 were sent directly to the change sponsor by email. The latter were uploaded to the portal. Two responses were received after the consultation closing date and the change sponsor accepted the first (received one day late) but did not include the second which was received nine days after the closing date. The explanation given was the length of time that had elapsed since the close of the consultation and that the content was already adequately covered by other stakeholder responses.</p> <p>Responses were received from a range of stakeholders including the local airports and heliports, Ministry of Defence (MoD) - Defence Airspace and Air Traffic Management (DAATM), NATS, representatives of gliding, paragliding and paramotoring groups, Council of the Isles of Scilly and Perranporth Flying Club.</p> <p>The following table shows a summary of all stakeholder responses:</p> <table border="1" data-bbox="358 1066 1509 1407"> <thead> <tr> <th data-bbox="358 1066 907 1185">Types of responses</th> <th data-bbox="907 1066 1509 1185">Number of responses and percentage of overall number of consultation responses</th> </tr> </thead> <tbody> <tr> <td data-bbox="358 1185 907 1238">Support the proposals</td> <td data-bbox="907 1185 1509 1238">29 (46%)</td> </tr> <tr> <td data-bbox="358 1238 907 1291">Prefer no change</td> <td data-bbox="907 1238 1509 1291">28 (44%)</td> </tr> <tr> <td data-bbox="358 1291 907 1407">Suggested alternative option to options consulted on</td> <td data-bbox="907 1291 1509 1407">2 (3.17%)</td> </tr> </tbody> </table>	Types of responses	Number of responses and percentage of overall number of consultation responses	Support the proposals	29 (46%)	Prefer no change	28 (44%)	Suggested alternative option to options consulted on	2 (3.17%)
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No comment (i.e. no preference given, or alternative options suggested)	4 (6.39%)
Total	63

The following table shows how the change sponsor's 14 key stakeholders responded to the proposal:

Types of key stakeholder responses	Number of responses and percentage of overall number of key stakeholder responses
Support the proposals	10 (71.42%)
Prefer no change	2 (14.28%)
Suggested alternative option to options consulted on	2 (14.28%)
Total	14

47 of the 63 responses were from members of the General Aviation (GA) community. The following table shows how the GA community responded to the proposals:

Types of responses from the GA community	Number of responses and percentage of overall number of GA stakeholder responses
Object to the proposals	28 (60%)
Support the proposals	14 (29.7%)
Undecided	5 (10.64%)

Total	47
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A total of 29 of the 63 stakeholders expressed support for the proposal and the following table shows which of the 4 options they expressed a preference for:

Types of responses	Number of responses and percentage of overall number of consultation responses
Support RMZ	11 (17%)
Support TMZ	0 (3%)
Support RMZ plus altering size of the LETC	2 (1.3%)
Support RMZ/TMZ plus altering size of the LETC	16 (25%)
Total	29 (46%)

The change sponsor invited feedback and comments from stakeholders regarding the height and breadth of the corridor and also for DP 9 -The airspace design shall consider operation by a single authority. The comments provided have been addressed at paragraph B.5.4 below.

Letters of Agreement (LoA)

MoD DAATM responding on behalf of RNAS Culdrose, the main operator of military aircraft in the LETC and surrounding area, stated there would be no negligible impact to their operations as all their aircraft should be operating a radio and transponder in flight. LoA's were in place with both Land's End and Penzance heliport and both could be amended in due course to ensure all parties were satisfied. There were no objections to the proposals from MoD airspace users.

Concerns were raised regarding the change sponsor's intentions regarding allowing paraglider operators continued access to the airspace at Sennen Cove for activities including training, tandem flights and pilot

	development in line with an existing LoA.	
B.2	APPROACH	
B.2.1	Did the change sponsor consult stakeholders in a suitable way?	YES
	The change sponsor conducted their consultation using citizen space in line with CAP 1616 requirements. Stakeholders were also given the option to submit their response by post, with the postal address included within the consultation document.	
B.2.2	What steps did the change sponsor take to encourage stakeholders to engage in the consultation?	
	<p>The following steps were taken to encourage engagement in the consultation:</p> <ul style="list-style-type: none"> - Stakeholders were sent a launch email on 4 January 2021. The email requested views on the proposal, provided a link to the consultation information and feedback form on citizen space and included a chart showing the LETC together with the consultation closing date. - A reminder email drawing attention to the consultation's closing date and including the link to the ACP's citizen space page was sent to stakeholders on 8 February 2021, i.e. 5 weeks prior to the closing date. - Emails were sent or phone calls made to some of the 14 key stakeholders who had not responded, inviting them to do so. - A final reminder was sent to all stakeholders, irrespective of whether they had already responded, on 9 March 2021 i.e. 1 week prior to the closing date. - The consultation was publicised on Land's End Airport's website. - Stakeholders were provided with the option of requesting a paper copy of the consultation and feedback form. No requests for a paper copy were received. <p>Evidence has been provided by the sponsor to demonstrate that the steps set out above were taken.</p>	
B.2.3	Was the change sponsor required to respond to any unexpected events and/or challenges?	YES
	On the evening of the first day of the consultation, the Prime Minister announced a third Covid-19 lockdown. The change sponsor considered that the consultation could proceed without any detriment to its efficacy. The majority of their key and other stakeholders were still operating as usual or working from home but contactable. The consultation was being conducted via electronic methods with no face to face meetings or seminars planned during the period of consultation. The decision to proceed was kept under review as the consultation progressed.	
B.3	MATERIALS	
B.3.1	What materials were used by the change sponsor during the consultation?	
	The materials used during the consultation comprised the following:	

	<p>Consultation document – the contents set out the scope and purpose of the consultation, the reasons identified for a change, justification for and objectives of the airspace change, the five options that were considered at stage 2 which included a no change option, an outline of the current airspace situation and an overview of the 4 options being consulted on (Option 1: Establish RMZ, Option 2: Establish a combined RMZ/TMZ, Option 3: Establish an RMZ and alter the size of the LETC and Option 4: Establish a combined RMZ/TMZ and alter the size of the LETC), predicted scale of impacts and benefits and how to respond to the consultation. Appendices set out a stakeholder list, feedback form for postal responses and final design principles 1 – 9.</p> <p>Consultation feedback form – stakeholders were invited to place the 4 options in order of preference: option 1 change to RMZ, option 2 change to combined RMZ/TMZ, option 3 change to RMZ and alter the size of the LETC and option 4 change to combined RMZ/TMZ and alter size of LETC. Stakeholders were asked to provide their reasons for their preferences, outline potential impact and suggest possible mitigations. Some stakeholders expressed their dissatisfaction at the lack of a no change option. The change sponsor has stated that it had been established earlier on in the process that doing nothing was not an option as a safety concern had been identified and that stakeholders still retained the option of using the comments section and asking for any rankings to be ignored due to their preference for no change.</p> <p>Citizen Space platform – the change sponsor provided an overview of their proposal on the citizen space platform, uploaded their consultation document, provided links to supporting information and invited stakeholders to provide their feedback electronically.</p> <p>Slide Show – the change sponsor included a slide show on the citizen space platform. This was a user-friendly overview of the proposal explaining key terminology and the reasons for the airspace change with the use of graphics and language that could be understood easily by any non-aviation stakeholders.</p> <p>Consultation strategy – the consultation strategy followed the structure set out in the CAA’s consultation strategy template and addressed the content required by CAP 1616, paragraph 167.</p>	
B.3.2	Did the materials provide stakeholders with enough information to ensure that they understood the issue(s) and potential impact(s) on them?	YES
	<p>The consultation document clearly outlined the safety issue regarding unknown traffic identified by the change sponsor, referenced the Airspace Modernisation Strategy and the initiative for introducing more aircraft utilizing electronic conspicuity and included a summary of the predicted scale of impact and benefits for the RMZ and combined RMZ/TMZ options.</p> <p>The separate slide pack provided an explanation of the proposal and key terms within it and was written in very plain and simple language so that it could be easily understood by those without technical aviation knowledge. This slide pack did not address potential impact of the proposals on stakeholders so reference to the consultation document would have been required for this information.</p> <p>There was criticism by some stakeholders of the clarity of some of the consultation text. For example a section</p>	

	<p>regarding paragliding activities at Sennen Cove being able to continue by entering into Letters of Agreement, referred to operators without radio equipment getting airborne from within the RMZ and then establishing 2-way radio contact and in a similar way referred to operators without transponders getting airborne from sites within the RMZ/TMZ and then operating a transponder. It has not been possible to evidence that stakeholders were provided clarification on this section.</p> <p>There was also feedback that no vertical dimensions of the corridor were included in the material, but that the change sponsor provided this information directly when asked.</p> <p>Stakeholders were also signposted to the Full Options Appraisal for a full assessment of impacts and benefits for all options.</p> <p>The materials, taken in their entirety, provided sufficient information to enable stakeholders to provide an informed response.</p>	
B.4	LENGTH	
B.4.1	Please confirm the start/end dates and the duration of the consultation below	
	<p>Start date: 04 January 2021</p> <p>End date: 15 March 2021</p> <p>Length: 10 weeks</p>	
B.4.2	If duration was less than 12 weeks, what was the justification?	YES
	The change sponsor provided rationale at the stage 3 gateway for a 12-week consultation length that spanned the Christmas and New Year holiday season which effectively rendered the consultation 10 to 11 weeks in length. The rationale was that the change is limited and primarily technical in nature, stakeholders were already well-informed and fully engaged in the process and the change sponsor had detailed plans for the consultation including the issue of prompt notifications. This rationale was accepted at the stage 3 gateway assessment meeting with the recommendation that a consultation length of 10-weeks commence after the Christmas and New Year holidays.	
B.4.3	Was the period of consultation proportionate?	YES
	Although a couple of stakeholders referred to the short duration of the consultation and considered more time should have been allowed for its wider promotion, the period of consultation was proportionate considering this is a level 2C airspace change proposal and the CAA had agreed a targeted approach at the stage 3 gateway assessment meeting.	
B.5	GENERAL	
B.5.1	Was the conduct of the consultation aligned with the consultation strategy?	YES
	The conduct of the consultation was aligned with the strategy.	

B.5.2	Has the change sponsor categorised the responses in accordance with CAP 1616?	YES
	<p>The change sponsor produced version 1.2 of their categorisation report dated April 2021 ACP-2019-75 Land's End Airport Stage 3 Step 3D Collate v1.2.docx. The responses were categorised in accordance with CAP 1616 requirements, split into those responses which may impact the final proposal and those that may not.</p> <p>The change sponsor was asked to review a response categorised as one that may not impact the final proposal although it was the same as other responses that had been categorised as those that may impact the final proposal. This was addressed and an updated version of the Step 3D document produced.</p> <p>All responses, including all those asking for no change, which were categorised as having the potential to impact the final proposal were taken forward to stage 4.</p>	
B.5.3	Has the change sponsor correctly identified all of the issues raised during the consultation and accurately captured them in the consultation response document?	YES
	The raw consultation data has been reviewed. The change sponsor correctly identified all of the issues raised by consultees in their Step 3D Categorisation of Responses document. The key issues have been accurately captured within their consultation response document.	
B.5.4	Does the consultation response document detail the change sponsor's response to the identified issues?	YES
	<p>Identified issues are outlined below:</p> <p><u>Objection to any change to the LETC.</u> 28 respondents from the GA community were against any change to the current format of the LETC. Their reasons included: all traffic must be allowed to fly around the mainland coast regardless of equipment level, there was no or insufficient evidence of a decrease in safety levels/near miss/airprox events to justify a change, the low number of movements at Land's End compared to other GA airfields with no more than basic ATZ protection did not warrant additional measures to increase exclusivity, the change was not justified on commercial grounds, Land's End Airport should invest in radar, the safety of the individual should be down to their individual choice, the RMZ/TMZ solution would ban paraglider pilots who use the area regularly and compress users into a smaller space which would create safety issues with the ACP having the unintended consequence of displacing the hazard of conflicting traffic from within the LETC to outside at the boundary.</p> <p>Response: While implementation of class A airspace and installation of radar would solve the problem entirely, this solution was neither achievable nor desirable so a more proportionate measure was required which would achieve the same aims without causing unnecessary restrictions for airspace users. It had been identified earlier on in the process that doing nothing was not a viable option since a safety concern had been raised and identified. The statement of need, accepted and approved by the CAA, highlighted that there was a case for an improved situation within the LETC and so a no change option was not consulted upon. The need to enhance safety had not altered. There are no preferred or required points of entry into the LETC</p>	

with ATC giving joining instructions or transit advice in line with the runway in use or traffic in the vicinity. Air traffic capacity has not been reached with regards to the number of aircraft that could be accommodated within the corridor. Any change to the classification of the LETC would not change this and so there would be no reason why choke points would be created but the eastern boundary of the corridor would be moved to make it more conspicuous on relevant charts.

Consultation options had not included a “no change” option. Concern was expressed that the consultation feedback form had not included a “no change” option and that the form had been devised so that a ranking had to be provided against each of the 4 consultation options to allow the respondent to move through the form to reach the general feedback sections. Some stakeholders considered this to be a grave omission, unfair and biased towards change.

Response: It had been identified earlier on in the process that doing nothing was not a viable option as a safety concern had been raised and identified. The general feedback and comments sections, including an overall feedback section at the end of the form, allowed respondents to ask that any rankings provided for the 4 options to be ignored and to state that they would prefer no change. All no change responses were noted and included in the Step 3D categorisation of responses report.

As outlined at paragraph B. 5.2 above, all no change responses were categorised as “may impact the final proposal” and were taken forward for consideration by the change sponsor at Stage 4.

RMZ option. The responses to this option included: this was a poor option as pilot reports are unreliable, pilots of non-radio equipped aircraft would be prevented from enjoying class G airspace and flying along the coast, many paraglider paramotor microlight pilots fly without radio, RMZ should be restricted to the existing corridor, an offshore RMZ is sufficient to achieve a fully known traffic environment for manned air platforms and recommendation of creation of an RMZ with open Flight Information Region (FIR) surface (SFC) to 2000ft along the coast. Traffic wishing to enter the LETC may be denied entry by being asked to “standby” since this does not establish the necessary two-way communication. Traffic in this standby state will potentially orbit in the St.Ives Bay area, not receiving any air traffic service and presenting a collision hazard.

Response: The RMZ option is now being progressed. The correct use of radio equipment offers the greatest safety benefits to all users of the airspace and its use needs to be mandated to reduce the potential for conflict in the airspace and to reduce the unknown traffic element. The usefulness of this relies on the accuracy of pilot position and level reports. Hand-held radios can be purchased for around £500. There may be a small number of aircraft that do not or would not wish to use 2-way radio equipment and so would not be permitted to enter the airspace without prior agreement. Agreements could be entered into to allow limited operation of these aircraft subject to other factors agreed with ATC.

The likelihood of traffic having to hold outside the LETC until adequate 2-way radio communication with ATC is established is a

remote possibility. It is judged to be remote as Land's End ATC has a Designated Operational Coverage (DOC) of 30NM and up to 8000ft. This has proved to more than adequate, and the only times communication has been disrupted between ATC and aircraft has been when Royal Navy helicopters have been flying near the surface of the sea in the Mounts Bay area.

The creation of an RMZ with open FIR SFC to 2000ft along the coast would not eliminate unknown traffic flying in close proximity to the LETC and the Land's End Aerodrome Traffic Zone (ATZ) This would result in a serious safety concern for arriving and departing traffic as three of the final approaches at Land's End have tracks that cross the coast at relatively low levels. . As the runways have IAP's likely to be used in poor weather, Land's End ATC are required to eliminate unknown traffic and potential conflict to the greatest extent possible. Search and Rescue (SAR) and MoD aircraft operate along the coast and need to retain contact with ATC. Paragliding and hang-gliding flights in the area are co-ordinated in advance with ATC who can warn other pilots of the activity.

TMZ option: The responses to this option included: A TMZ alone establishes a picture of traffic in the area but does not identify to an air traffic service the intention of the aircraft, the changes would restrict the area to general aviation and would preclude coastal flights of the mainland coast without a transponder if a TMZ was initiated. Many microlights, most privately operated hot air balloons and no paragliders have transponders. Many aircraft are unable to equip with a transponder due to weight penalty and power requirements. The cost of installing a transponder is excessive and the TMZ option serves no purpose for the two air traffic control units as they don't have radar and whilst it would alert a Traffic Collision Avoidance System (TCAS) it creates an unnecessary burden on air users. Restricting electronic conspicuity (EC) enabled aircraft to those fitted with a transponder would go against the current encouragement by the CAA and the Department for Transport (DfT) to equip with EC devices that need not be transponders. Some stakeholders stated that the TMZ option should be pursued but with Automatic Dependent Surveillance – Broadcast (ADS-B) mandated.

Response: The RMZ option is now being progressed. At some point in the future ADS-B would potentially be a preferred form of TMZ, but current legislation does not support its use at this time.

Combined RMZ/TMZ option: Concerns raised that this would only be able to operate H24.

Response: The RMZ option is now being progressed. The hours of operation of the RMZ would coincide with operating hours of the airports within the corridor.

DP8 – Feedback was invited on the height and breadth of the corridor. Responses received included: no justification for increasing the size based on predicted traffic volume levels, preference for a much smaller area over the Cornish mainland and with a lower limit to allow coastal transits of unequipped aircraft, area should be kept as small as possible as currently enjoyed

by so many, the dimensions should be increased to ensure GNSS procedures, Instrument procedures and GNSS PinS procedures all have protection from the revised LETC structure and that the breadth should be increased to encompass the holding points to the North and South of Land's End Airport for the RNP approaches. Concern was expressed about the impact an increase in vertical limit would have on Newquay Lower Airspace Radar Service (LARS).

Response: Most of the size change takes place over the sea and won't have an adverse effect on most of the traffic using that portion of the LETC. No increase in the vertical limit is planned as the change sponsor is of the view that the current 400ft vertical limit is correct in terms of traffic management and safety. The LETC shape has been refined with the eastern boundary moved further away from the St.Ives Bay area to ensure airspace is not unnecessarily taken up and to make it more conspicuous on relevant charts. The overall shape takes into account Instrument Approach Procedures (IAP's) at Land's End and St.Mary's airports and proposed PinS approaches at Penzance. The change sponsor proposes that the amendments to the shape take place in stages with stage 1 incorporating the IAP's at Land's End. Stage 2 relating to the PinS approaches at Penzance and stage 3 the IAP's at St.Mary's to be incorporated in due course once the corresponding airspace change proposals have been approved.

Design Principle (DP) 9 – The airspace design shall consider operation by a single authority. Some stakeholders thought this was a sensible option with the reasons including having multiple authorities increases pilot workload and that this DP could in itself offer a proportionate solution to reduce the incidence of unknown traffic. Others considered the flexibility of coordination from both airfields should be retained and cited the proven co-operation of the current arrangements.

Response: The current set up works well and is widely known by pilots and ATS units and will be retained. RMZ requirements could be met by being in two-way radio communication with any of the currently operating ATS units or operating within the terms of a LoA.

The issues below were included with those categorised as not having the potential for impact on the final proposal, but the change sponsor captured actions or considerations arising from their comments within their submission.

Paragliding activities in the area. Respondents provided example of recreational paragliding/hang gliding activities that could be shut down: for example, flying at Sennen or Morvah and flying coast to coast paragliding cross-country flights from Morvah cliff to near Lamorna.

Response: These paragliding and hang-gliding operators that utilise an area near to Sennen Cove which is situated within the ATZ to the west of Land's End Airport are not radio-equipped. All activities are subject to an agreement with the airport authority allowing the clubs to operate within the ATZ when other operations are taking place. Specific ATC approval is required on the day. A new LoA has been drafted dated 10 May 2021 (and included within the final submission) for the paragliding operators at Sennen Cove regarding allowing continued access to the airspace for these activities.

	<p><u>Impact on wildlife</u> Natural England asked that the change sponsor fully consider the requirements of the Habitats Directive, particularly with regards to disturbance to wildlife such as birds and seals.</p> <p>Response: Sensitive wildlife areas are already identified within the LETC and procedures are in place to ensure their safety.</p>	
B.5.5	Is the change sponsor's response to the issues raised appropriate/adequate?	YES
	<p>Following assessment of responses categorised as those that may affect the final proposal and areas of concern addressed at B.5.4 above, the change sponsor is progressing with consultation option 3 RMZ as they consider that this option is of direct benefit to airspace users and air traffic control alike and will be the mainstay of improving safety. The change sponsor has also made alterations to the size and shape of the corridor. The refining of the LETC shape at this time encompasses Land's End approaches. As the RNP approaches at St.Mary's Airport and the PinS approach at Penzance Heliport are in the early stages of separate airspace change proposals, the change sponsor plans to propose amending the size of the corridor further in due course should those separate proposals be successful. As a result their plans for alteration to the size of the corridor will be phased – stage 1 to incorporate Land's End approaches, stage 2 to incorporate PinS approach at Penzance and stage 3 to incorporate the IAP's at St.Mary's Airport.</p> <p>The change sponsor recognises that if they were to redefine now the shape of the corridor to include all approaches, whether approved already or proceeding via airspace change proposals, then the size of the corridor would be larger than it needs to be for the time being. This approach reflects feedback received on this point.</p> <p>The change sponsor plans to rename the corridor so that the new airspace is known as the Land's End RMZ (LRMZ). By renaming the corridor, the change sponsor states that the realisation of a new airspace and new requirements will be brought to the forefront of pilots' minds when planning their flights.</p> <p>The change sponsor has submitted a new LoA (dated 10 May 2021) for paragliding operations at Sennen Cove. The eastern portion of the LETC falls within the RNAS Culdrose AIAA. An existing LoA (dated 20 July 2020) has been submitted for the Air Traffic Service Units (ATSU's) within the LETC and RNAS Culdrose.</p>	
B.5.6	Is the formal airspace change proposal aligned with the conclusions of the consultation response document?	YES
	The consultation response document addresses the fact that the original final proposal submitted to the CAA was to progress the change sponsor's preferred consultation option 4, combined RMZ/TMZ with alteration in size of the LETC. However, after further consideration the change sponsor now considers that option 3 RMZ with corridor size alteration is a fairer and more workable	

	solution to the safety issues in the current LETC and addresses the needs of the design principles, regular airspace users and ATC. This formal airspace change proposal is now aligned with the conclusions of the revised consultation response document.	
B.6	RECOMMENDATIONS/CONDITIONS/PIR DATA REQUIREMENTS	
B.6.1	Are there any Recommendations which the change sponsor <u>should try</u> to address either before or after implementation (if approved)? If yes, please list them below.	YES
	<p><i>GUIDANCE NOTE:</i> Recommendations are something that the change sponsor <u>should try</u> to address either before or after implementation, if indeed the airspace change proposal is approved. They may relate to an area in which the change sponsor is reliant upon a third party to actually come to an agreement and consequently they do not carry the same 'weight' as a Condition.</p> <p>The change sponsor should inform the stakeholders of the decision (when published) and next steps.</p>	
B.6.2	Are there any Condition(s) which the change sponsor <u>must fulfil</u> either before or after implementation (if approved)? If yes, please list them below.	YES
	<p><i>GUIDANCE NOTE:</i> Conditions are something that the change sponsor <u>must fulfil</u> either before or after implementation, if indeed the airspace change proposal is approved. If their proposal is approved, change sponsors <u>must</u> observe any condition(s) contained within the regulatory decision; failure to do so <u>will usually</u> result in the approval being revoked. Conditions should specify the consequence of failing to meet that condition, whether that be revoking the ACP or some alternative.</p> <p>All LoA's must be agreed and signed prior to implementation of this airspace change, if approved.</p>	
B.6.3	Are there any specific requirements in terms of the data to be collected by the change sponsor for the Post Implementation Review (if approved)? If yes, please list them below.	YES
	<p><i>GUIDANCE NOTE:</i> PIR data requirements concerns any specific data which the change sponsor should be instructed to collate post-implementation, if indeed the airspace change proposal is approved. Please use this section to list any such requirements so that they can be captured in the regulatory decision accordingly.</p> <p><u>STAKEHOLDER OBSERVATIONS</u></p>	

	<p>The change sponsor is required to collate related stakeholder observations (enquiry/complaint data) and present it to the CAA. Any location/area from where more than 10 individuals have made enquiries/complaints must be plotted on separate maps displaying a representative sample of:</p> <ul style="list-style-type: none"> • aircraft track data plots; and • traffic density plots <p>The plots should include a typical days-worth of movements from the last month of each standard calendar quarter (March, June, September, December) from each of the years directly preceding and following implementation of the airspace change proposal.</p>
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PART C – Consultation Assessment Conclusion(s)

C.1	Does the consultation meet the CAA’s regulatory requirements, the Government’s guidance principles for consultation and the Secretary of State’s Air Navigation Guidance?	YES
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	<p>The fundamental principles of effective consultation are targeting the right audience, communicating in a way that suits them, and giving them the tools to make informative, valuable contributions to the proposal’s development. I am satisfied that these principles have been applied by the change sponsor before, during and after the consultation. I am also satisfied that the change sponsor has conducted this consultation in accordance with the requirements of CAP 725, that they have demonstrated the Government’s consultation principles and that the consultation has:</p> <ul style="list-style-type: none"> • Taken place when the proposal was at a formative stage – evidenced by the consultation document in which the change sponsor demonstrated that they were willing to be influenced by feedback by stating that all feedback would be considered in producing the final design which could differ from the proposal consulted on. • Presented the consultation material clearly and outlined the potential impacts that needed to be considered – evidenced by the consultation document which outlined the safety issue regarding unknown traffic identified by the change sponsor giving rise to the proposal and set out a summary of the predicted scale of impact and benefits for the RMZ and combined RMZ/TMZ options. • Provided a sufficient timeframe to allow considered responses – evidenced by a consultation length of 10 weeks which was a proportionate period of time for a level 2c airspace change adopting a targeted approach. • Taken into account the product of the consultation – evidenced by the moving away from the change sponsor’s preferred option 4 to a final proposal of consultation option 3 RMZ which the change sponsor considers to be a more equitable way forward. Also evidenced by the alteration of the size and refining of the shape of the corridor to ensure airspace was not unnecessarily taken up.
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PART D – Consultation Assessment Approval			
	Name	Signature	Date
Consultation assessment completed by (Airspace Regulator – Engagement and Consultation)	[REDACTED]	[REDACTED]	17 June 2021
Consultation assessment approved by (Principal Airspace Regulation)	[REDACTED]	[REDACTED]	8 July 2021
PART E – Group Director Safety and Airspace Regulation – Comment/Approval			
N/A Level 2C			
Name		Signature	Date