

Aberdeen International Airport

Airspace Change Proposal

Consultation Categorisation Document

Date: September 2024
Document Version: v1.1
Status: For submission to CAA

Contents

Contents	2
1. Introduction	3
1.1 Airspace Modernisation	3
1.2 Airspace Change Process	3
1.3 Aberdeen Airport’s Airspace Change Proposal (ACP) Stage 3 Consultation	4
1.4 This consultation categorisation document	4
2. Aberdeen Airport’s consultation – We asked	5
2.1 Consultation Questions	5
3. Aberdeen Airport’s Consultation – You said, we did	7
3.4 Responses to our questions about PBN arrivals	7
3.5 Responses to our questions about Controlled Airspace (CAS)	13
4. Conclusion and next steps	24
5. Appendix A Full Consultation Feedback and Categorisation	25

1. Introduction

1.1 Airspace Modernisation

- 1.1.1 The UK’s airspace is some of the busiest in the world. In 2017 the Department of Transport (DfT) notified aviation stakeholders that, as the demand for aviation is forecast to continue growing, delays and environmental impacts are expected to increase if the UK’s airspace is not upgraded to introduce additional capacity.
- 1.1.2 In response, the Civil Aviation Authority (CAA) was tasked to develop the UK Airspace Modernisation Strategy (AMS) which was first published in December 2018.
- 1.1.3 The overall programme of changes required to implement the AMS is considered one of the most significant airspace and Air Traffic Management (ATM) developments ever undertaken. Some of the most important changes described in the AMS concern the widespread adoption of satellite-based navigation technology, known as Performance Based Navigation (PBN).

1.2 Airspace Change Process

- 1.2.1 Since January 2018 any changes to airspace are required to follow the CAA’s CAP1616 regulatory guidance. CAP1616 outlines a 7-stage process for changing airspace design including community engagement requirements.
- 1.2.2 The airspace change process should be open and transparent. Stakeholders should be engaged by the change sponsor throughout the airspace change process and have the opportunity to submit feedback in relation to the development of the airspace change proposal.
- 1.2.3 The CAA monitors the progress of an airspace change proposal (ACP) against the requirements of the airspace change process at key defined points called gateways. At each gateway, the CAA will assess whether the relevant airspace change process requirements have been met. The gateways are there to determine whether the process has been followed up to that point, and whether to approve progress to the next stage.

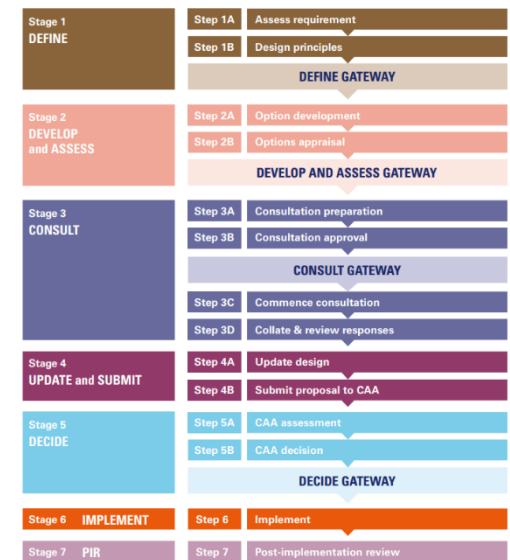


Figure 1 CAP1616 7-stage process

1.2.4 The first 2 stages of Aberdeen Airport's ACP were carried out between November 2019 and December 2022 and are based on the regulations in the fourth edition of CAP1616. In October 2023 the CAA published the fifth edition of CAP1616 and in December 2023 the CAA confirmed that Aberdeen should continue to follow the CAP 1616 Version 4 process requirements up to the Stage 3. From Stage 4 onwards, Aberdeen Airport is required to follow version 5 of CAP1616.

1.3 Aberdeen Airport's Airspace Change Proposal (ACP) Stage 3 Consultation

1.3.1 Aberdeen Airport is undertaking an ACP to improve resilience and meet the UK's AMS. A key element of the strategy is to introduce modern satellite-based navigation, called Performance Based Navigation (PBN), by the end of the decade. For Aberdeen Airport, this means offering modern PBN arrival procedures for resilience and training, alongside our current arrival procedures. It also means reviewing our airspace structures to ensure we are using the minimum volume of airspace necessary.

1.3.2 In January 2024 we submitted our draft proposals for Consultation to the CAA and in March 2024 Aberdeen Airport was approved by the CAA to proceed to Consultation. From Monday 29 April to Sunday 21 July 2024 Aberdeen Airport consulted on our proposals for the ACP. These were:

- 1. The introduction of modern satellite-based arrival procedures¹ which would be used by a very small percentage of arrivals for resilience and training purposes; and**
- 2. The release of a section of the Controlled Airspace (CAS), which is not used by the aircraft arriving or departing from Aberdeen Airport, for the benefit of other airspace users.**

1.3.3 18 consultation responses were received during the consultation period and 2 late responses were received shortly after the Consultation closed.

1.4 This consultation categorisation document

1.4.1 This document is the consultation categorisation document which is required as part of the Stage 3 activities in CAP1616 Edition 4. At this stage, CAP1616 (189) requires us to categorise the consultation feedback into those 'that may lead to a change in the design and those that could not'. Feedback categorised as 'may impact the final proposal' will be carried forward to Stage 4 for further consideration.

¹ Required Navigation Performance (RNP 1) Approaches

2. Aberdeen Airport's consultation – We asked

2.1 Consultation Questions

2.1.5 As part of the consultation, we asked consultees 19 questions. The consultation was split into two distinct parts, firstly regarding the introduction of the PBN arrivals and secondly regarding the release of a section of Controlled Airspace.

2.1.6 Following the initial introduction questions (1-7), consultees could skip to question 10 if they did not wish to answer questions on the PBN arrivals. Additionally, question 10 allowed consultees to identify if they were an airspace user or not, and subsequently answer the questions most appropriate for them (either questions 11-15 or 16-18). The list of consultation questions was:

1. Name
2. Email address
3. Postcode
4. Are you responding to this consultation as an individual or on behalf of an organisation?
5. If you are responding on behalf of an organisation, what is the name of that organisation?
6. What is your interest in this airspace change proposal? [multi-choice response]
7. Would you like your name to be published alongside your response?
8. What are your thoughts on the proposal to introduce PBN arrivals?
9. Do you have any further comments you would like to share about the introduction of PBN arrivals at Aberdeen Airport?
10. Are you an airspace user?
11. As an airspace user, how satisfied are you with the proposed change?
12. Can you provide details on why you feel that way?
13. As an airspace user, in particular for GA (General Aviation) pilots, can you think of any visual features that could better define the boundary?
14. Thinking specifically of Controlled Airspace, do you have any further comments?
15. Please select here to move straight to the "Final Thoughts" section
16. As a non-airspace user, do you support this proposal?
17. Please expand on your answer

18. Thinking specifically of Controlled Airspace, do you have any further comments?

19. Do you have any further feedback on this Airspace Change Proposal?

2.1.7 During the consultation period, a total of 18 responses were received. All responses were received via Aberdeen's Citizen Space portal. No postal responses were received.

2.1.8 Following the end of the consultation period, we also received 2 further responses, bringing the **total number of responses to 20**.

3. Aberdeen Airport’s Consultation – You said, we did

- 3.1.1 Within this section, we have included details of the qualitative feedback raised for each question and our response to that feedback.
- 3.1.2 At this stage, CAP1616 (189) requires us to categorise the consultation feedback into ‘that may lead to a change in the design and those that could not’. Feedback categorised as ‘may impact the final proposal’ will be carried forward to Stage 4 for further consideration.
- 3.1.3 Within the tables below, we have included all qualitative feedback provided, unless the respondent has answered in a way to say they have no feedback to that question, for example by saying ‘None’, ‘n/a’ or ‘Nil’. For the full details of each consultation response received, please see [Appendix A](#). Any feedback which will be carried forward for consideration as part of Stage 4 has been highlighted in red.

3.4 Responses to our questions about PBN arrivals

Responses to ‘8. What are your thoughts on the proposal to introduce PBN arrivals?’

- 3.4.1 18 out of 20 consultees responded to the question ‘What are your thoughts on the proposal to introduce PBN arrivals?’.
- 3.4.2 Table 1 shows the details of the feedback and our response to question 1 ‘What are your thoughts on the proposal to introduce PBN arrivals?’.

Table 1 ‘You said, we did’ (Question 8)

‘You said’	‘We did’ CAP1616 categorisation	Aberdeen Airport response
From an ATC point of view, the introduction of PBN approaches is supported and encouraged. Reducing the reliance on ground based infrastructure adds better resilience to the operation without noticeably changing the profiles of	Will not impact the proposal	Thank you for your support of our proposals to introduce PBN arrivals to Aberdeen Airport.

‘You said’	‘We did’ CAP1616 categorisation	Aberdeen Airport response
inbound aircraft. Workload for controllers during ground based outages would potentially be decreased.		
Loganair are broadly supportive of the introduction of PBN/RNP approaches. Many of the airports that we operate to, both in the UK or Europe already utilise these approaches. Loganair aircraft/crew can typically fly to LNAV minima, which tends to be higher than the equivalent ILS approach. For this reason, it is unlikely that we would utilise the RNP approaches often, unless for training purposes. The RNP approaches would provide good resilience if either ILS system were to be unserviceable.	Will not impact the proposal	Thank you for your support of our proposals to introduce PBN arrivals to Aberdeen Airport.
Good. About time. However a lot of expense for little reward. Perhaps work on lowering charges for airlines and passengers to draw them back to the airfield instead of raising them.	Will not impact the proposal	Thank you for your support of our proposals to introduce PBN arrivals to Aberdeen Airport. The feedback about charges has been shared with the appropriate airport team.
Fantastic idea to modernise the process of landing	Will not impact the proposal	Thank you for your support of our proposals to introduce PBN arrivals to Aberdeen Airport.
They should be implemented sooner rather than later and be used for all air traffic.	Will not impact the proposal	Thank you for your support. We are working to implement PBN arrivals as quickly as possible within the timelines of the CAP1616 process. Within our consultation document (4.2.8 and 4.2.9) we have explained why it is not possible for all air traffic to use PBN arrivals at Aberdeen Airport.
The way forward. many, many airports have these procedures (including smaller, local aerodromes) and are a back up to existing navigational aids if	Will not impact the proposal	Thank you for your support of our proposals to introduce PBN arrivals to Aberdeen Airport.

'You said'	'We did' CAP1616 categorisation	Aberdeen Airport response
they were to fail. Also aircraft that fly these PBN approaches tend to fly at the optimum level, speeds, therefore reducing emissions etc		
I believe that the introduction of PBN arrivals will further aid controllers with traffic separation and flow, with an ultimate view to saving time for pilots, passengers etc. More importantly, the PBN arrivals can be introduced without having any effects on current approach procedures into Aberdeen. The PBN arrivals also streamline the options available to many types of aircraft. Although in the very early stages, I believe that we could see PBN arrivals become more common up and down the UK. Finally, the PBN arrivals will extend the options available to pilots in different meteorological conditions and operations environments.	Will not impact the proposal	Thank you for your support of our proposals to introduce PBN arrivals to Aberdeen Airport.
The PBN arrivals are probably a necessary next step in the airspace modernisation programme, even though they will be little used due to the more flexible traffic vectoring that occurs at Aberdeen. We cannot see that the existence of these arrivals will have any significant negative impact, and so we are supportive.	Will not impact the proposal	Thank you for your support of our proposals to introduce PBN arrivals to Aberdeen Airport.
Great. 👍	Will not impact the proposal	Thank you for your support of our proposals to introduce PBN arrivals to Aberdeen Airport.
A sensible enough step but assuming there is an increase in the use of PBN systems is a single waypoint sufficient?	Will not impact the proposal	Thank you for your support. As the proposed procedures are being introduced predominantly for resilience and training purposes, it is expected that the PBN arrivals design (using a single waypoint for each runway end) will be appropriate for the traffic at Aberdeen Airport. We expect the vast majority of aircraft to continue to use the

'You said'	'We did' CAP1616 categorisation	Aberdeen Airport response
		Instrument Landing System (ILS) when arriving at Aberdeen Airport.
Long overdue 😊	Will not impact the proposal	Thank you for your support of our proposals to introduce PBN arrivals to Aberdeen Airport.
As a GA representative, PBN arrival have no material impact upon our activity so cannot express an informed opinion on this proposal.	Will not impact the proposal	n/a
The BMAA supports the proposal to introduce PBN arrivals, although this is unlikely to affect our members.	Will not impact the proposal	Thank you for your support of our proposals to introduce PBN arrivals to Aberdeen Airport.
I think PBN arrivals are an excellent idea and the sooner they are introduced, the sooner the benefit will be experienced by airspace users.	Will not impact the proposal	Thank you for your support of our proposals to introduce PBN arrivals to Aberdeen Airport.
HIAL, Dundee, Inverness and Wick Airports have no comments on the introduction of PBN approached at Aberdeen Airport	Will not impact the proposal	n/a
Predominantly nil impact to MoD. The introduction of PBN arrivals to Aberdeen may positively influence the airport's availability as a diversion for suitably equipped MoD aircraft.	Will not impact the proposal	Thank you for your support of our proposals to introduce PBN arrivals to Aberdeen Airport.
Sensible proposals	Will not impact the proposal	Thank you for your support of our proposals to introduce PBN arrivals to Aberdeen Airport.
NATS NERL plc believes that the introduction of PBN operations is a positive step	Will not impact the proposal	Thank you for your support of our proposals to introduce PBN arrivals to Aberdeen Airport.

Responses to '9. Do you have any further comments you would like to share about the proposed introduction of PBN arrivals at Aberdeen Airport?'

3.4.3 11 of the 20 respondents either said they had no further comments or left the question blank when asked 'Do you have any further comments you would like to share about the proposed introduction of PBN arrivals at Aberdeen Airport?'

3.4.4 Table 2 shows the details of the feedback and our response to question 9 ‘Do you have any further comments you would like to share about the proposed introduction of PBN arrivals at Aberdeen Airport?’.

Table 2 'You said, we did' (Question 9)

‘You said’	‘We did’ CAP1616 categorisation	Aberdeen Airport response
<p>In keeping with our previous responses regarding the introduction of PBN arrivals, we'd like reassurance that the existing conventional approaches will remain available. These conventional methods will usually allow us to fly to slightly lower minima, and also allows for the rare occasion that an aircraft cannot fly an RNP approach. This could be due to an aircraft defect, or if the area/airport is subject to GPS jamming.</p>	<p>Will not impact the proposal</p>	<p>The PBN arrivals are intended to be available alongside the existing conventional approach procedures. Aberdeen Airport has no current plans to withdraw any of the existing conventional approach procedures.</p>
<p>They are fine but not essential. What is essential seems to be bypassing the airport management.</p>	<p>Will not impact the proposal</p>	<p>Thank you for your feedback which has been shared with the appropriate airport team.</p>
<p>I would like to see more data that shows how current emissions of greenhouse gases, noise and air pollution are going to be affected, once the ball gets rolling with the introduction of PBN arrivals.</p>	<p>Will not impact the proposal</p>	<p>The Full Options Appraisal document contains lots of detailed noise and environmental information on the proposals based on scenarios with and without the airspace change. The assessments within the FOA reflected the uptake of PBN arrivals we expect at the year of implementation and 10 years after implementation. The assessment methodology meets the requirements of CAP1616 and was assessed by the CAA as part of the Stage 3 gateway.</p>
<p>The recent proliferation of not just GPS jamming but GPS spoofing in some areas of the world, demonstrates how fragile a PBN approach could be.</p>	<p>Will not impact the proposal</p>	<p>In the rare event of a GNSS outage, the existing conventional approaches will continue to be</p>

'You said'	'We did' CAP1616 categorisation	Aberdeen Airport response
Perhaps ANSPs such as Aberdeen need to have a strategy for detecting and dealing with such an event, even though it may be relatively unlikely to occur in UK airspace.		promulgated and available for aircraft arriving at Aberdeen Airport. Further details around Air Traffic Control (ATC) procedures in the event of GNSS outage will be included as part of our Stage 4 submission to the CAA.
The material available at the public consultation on 21st May at the Science Centre was instructive and informative. Our questions were answered by the representatives from Arup and AGS	Will not impact the proposal	Thank you for your feedback around the consultation event.
Excellent idea	Will not impact the proposal	Thank you for your support of our proposals to introduce PBN arrivals to Aberdeen Airport.
No just good luck with the implementation.	Will not impact the proposal	Thank you.
Positive move	Will not impact the proposal	Thank you for your support of our proposals to introduce PBN arrivals to Aberdeen Airport.
Noting the limited use of the PBN approach - if there were a change in circumstance, then the environmental element would need to be re-examined.	Will not impact the proposal	The assessments within the FOA reflect an optimistic uptake of PBN arrivals we expect at the year of implementation and 10 years after implementation. This is based on the expectation that the PBN arrivals will be used for resilience and training. A change in circumstance, for example if the PBN arrivals were to become used on a routine basis above the levels shown in this ACP, would require a separate CAP1616 proposal. In the event of this, the environmental impacts would require reassessment at the traffic levels anticipated.

3.5 Responses to our questions about Controlled Airspace (CAS)

- 3.5.1 For the next set of questions around Controlled Airspace (CAS), our Citizen Space questionnaire initially directed respondents to the appropriate set of questions by asking whether they were an airspace user. For those not interested in the CAS proposals, there was also an option to skip the questions and go straight to the final section of the form.
- 3.5.2 9 selected that they were airspace users and were directed to question 11 onwards.
- 3.5.3 10 selected that they were not an airspace user, but they wanted to answer questions about CAS and were directed to question 16 onwards.
- 3.5.4 1 respondent did not respond to the CAS questions and was directed to question 19.

Responses to '11. As an airspace user, how satisfied are you with the proposed change?'

- 3.5.5 9 respondents were directed to question 11 'As an airspace user, how satisfied are you with the proposed change?' and were given the option to select 'satisfied', 'neither satisfied nor dissatisfied' or 'dissatisfied'.
- 3.5.6 All 9 respondents selected that they were satisfied.

Responses to '12. Can you provide details on why you feel that way?'

- 3.5.7 Following question 11 above, the 9 respondents were asked 'can you provide details on why you feel that way?'
- 3.5.8 Table 3 shows the details of the feedback and our response to question 12 'Can you provide details on why you feel that way?'

Table 3 'You said, we did' (Question 12)

'You said'	'We did' CAP1616 categorisation	Aberdeen Airport response
<p>As we fly from Aboyne we are right on the edge of current airspace it is to easy to find ourselves straying into airspace.</p> <p>With easterly winds the current 3000 ft is a nightmare we end up way downwind struggling to get back as we are unable to be downwind to the east this change would allow for safer flying ensuring no airspace infringements.</p>	<p>Will not impact the proposal</p>	<p>Thank you for your support of our proposals to release a section of CAS.</p>
<p>The proposed change provides a range of benefits to pilots at Deeside Gliding Club, in that cross country flights will be easier to plan, and execute. The change also reduces the chances of potential airspace infringements, and makes entry negotiations easier.</p>	<p>Will not impact the proposal</p>	<p>Thank you for your support of our proposals to release a section of CAS.</p>
<p>Aberdeen airport is to be congratulated on agreeing to raise the level of the CAS fillet adjacent to Deeside Gliding club, and in this latest iteration extend the raised portion further east. Airports voluntarily giving up airspace is a rare event! Thank you.</p>	<p>Will not impact the proposal</p>	
<p>Release of airspace no longer needed by Aberdeen would be welcome.</p>	<p>Will not impact the proposal</p>	
<p>Any release of controlled airspace is a good thing after all gliders existed before power planes</p>	<p>Will not impact the proposal</p>	<p>Thank you for your support of our proposals to release a section of CAS.</p>
<p>This comment was created by former CFI (myself) and Club Airspace Officer, who both attended the meeting 13 June</p> <p>Summary Deeside Gliding Club supports the proposed raising of lower height limit in the western part of what is currently CTA3.</p>	<p>Will not impact the proposal</p>	

‘You said’	‘We did’ CAP1616 categorisation	Aberdeen Airport response
<p>There are potential operational and. safety gains for the club.</p> <p>Operations.</p> <p>When There is an Easterly wind, gliders at present, can only be towed approximately 1 nm to the east until reaching the CTA boundary at 2500 feet AAL, (3000 ft AMSL)</p> <p>The increased height limit will permit less constrained training flights, is not having to compensate for the westerly drift, since we will be able to tow further upwind.</p> <p>It will also open lower altitude soaring opportunities well to the East, without requiring ATC contact.</p> <p>Safety.</p> <p>Occasionally gliders flying above cloud may be caught out by closing " wave gaps", ie the clear air gap between lenticular clouds closes as more humid air blows from SW through W to NW.</p> <p>Those who do not descend in time may require to descend through cloud, or penetrate the CTA to descend further downwind in VMC.</p> <p>The workload of navigating, maintaining control in reducing visual conditions and talking to ATC is significant, and this raising of the lower limit may relieve a glider pilot of the communications task in the designated area below the</p>		

'You said'	'We did' CAP1616 categorisation	Aberdeen Airport response
<p>new limit. Or indeed permit a VMC descent, again respecting these new boundaries, albeit probably downwind of the club..</p> <p>Deeside Gliding Club welcomes this proposed change.</p>		
<p>As a representative of the GA community, in particular, Gliding at the Deeside Gliding Club based just to the east of Aboyne, the release of airspace markedly impacts both safety close to the site and increases operational efficiency.</p> <p>Safety is improved as take off and landing activity in close proximity to controlled airspace will not be so tightly constrained with an increase in ceiling to 4,500 asl. immediately to the east of the airfield.</p> <p>Operational efficiency will be improved. The glider drop zone has been limited to overhead or west of the airfield due to the restricted base of the airspace. This limits dropping gliders upwind of the airfield in easterly wind directions. Also, soaring to the east is similarly limited. Raising the base of airspace to effectively 4,000' above the site will markedly increase access to the east.</p>	<p>Will not impact the proposal</p>	<p>Thank you for your support of our proposals to release a section of CAS.</p>
<p>It is general BMAA policy to support the release of unnecessary controlled airspace.</p>	<p>Will not impact the proposal</p>	<p>Thank you for your support of our proposals to release a section of CAS.</p>
<p>The raising of CAS base level simplifies low level flying operations in this area.</p>	<p>Will not impact the proposal</p>	

Responses to ‘13. As an airspace user, in particular for GA (General Aviation) pilots, can you think of any visual features that could better define the boundary?’

3.5.9 The 9 respondents were then directed to a question asking about visual features to help define the Controlled Airspace boundary.

3.5.10 Table 4 shows the details of the feedback and our response to question 13 ‘As an airspace user, in particular for GA (General Aviation) pilots, can you think of any visual features that could better define the boundary?’. 3 of the 9 respondents either said no or left the question blank.

Table 4 ‘You said, we did’ (Question 13)

‘You said’	‘We did’ CAP1616 categorisation	Aberdeen Airport response
Unfortunately very little obvious markers currently exist.	Will not impact the proposal	n/a
Visual features could include the addition of more visual reference points (VRPs) near the boundary, or VFR checkpoints.	May impact the proposal	Based on feedback from this consultation, we will consider additional VRPs based on any feedback provided by airspace users.
All glider pilots flying from Deeside Gliding Club will have moving map displays showing the airspace boundaries, and so it does not particularly matter to us if the boundaries are not well defined by ground features. We are content with the proposed boundary.	Will not impact the proposal	Thank you for your feedback.
I don’t access CTA3 so I couldn’t say	Will not impact the proposal	n/a
Insch VRP at north, unsure from supplied maps about southern point.	May impact the proposal	Thank you, we will consider this suggestion as part of the work to finalise the proposal in Stage 4.
Invercannie Water Works might be a useful feature on the eastern edge of the airspace release area.	May impact the proposal	Thank you, we will consider this suggestion as part of the work to finalise the proposal in Stage 4.

Responses to ‘14. Thinking specifically of Controlled Airspace, do you have any further comments?’

3.5.11 The 9 respondents were then directed to a final question around CAS asking if they had any further comments.

3.5.12 Table 5 shows the details of the feedback and our response to question 14 ‘Thinking specifically of Controlled Airspace, do you have any further comments?’. 7 respondents left this question blank or said they had no further comments.

Table 5 ‘You said, we did’ (Question 14)

‘You said’	‘We did’ CAP1616 categorisation	Aberdeen Airport response
Clearances into controlled airspace should still be as straightforward after the base level raise.	Will not impact the proposal	Thank you for your feedback.
I don’t use controlled airspace as a refusal is the normal ATC response	Will not impact the proposal	ATC refusal of clearance in an exception rather than normal practice. We have no local indications of regular refusal, and we would always encourage contact with ATC.

3.5.13 After this final CAS question, the 9 respondents who had answered ‘yes’ to ‘are you an airspace user’, were directed to question 19.

Responses to ‘16. As a non-airspace user, do you support this proposal?’

3.5.14 The 10 respondents who answered that they were not an airspace user, but wished to provide feedback on the CAS proposal, were directed to question 16.

3.5.15 Question 16 asked ‘As a non-airspace user, do you support this proposal?’. Three answer options were available to select: ‘yes’, ‘no’ and ‘unsure’.

3.5.16 9 answered ‘yes’ and 1 answered ‘no’.

Responses to '17. Please explain why? (if required)'

3.5.17 Following question 16 above, the 10 respondents were asked to expand on their answer. Table 6 shows the details of the feedback and our response to question 17 'please explain why'. 5 respondents either left the question blank, said 'n/a', or had 'no objection'.

Table 6 'You said, we did' (Question 17)

'You said'		'We did'	
As a non-airspace user, do you support this proposal?	Please explain why	CAP1616 categorisation	Aberdeen Airport response
No	Do NOT release this airspace! The gliding and other users have hundreds of miles of open air. ATC at Aberdeen and the airlines do not. Aircraft struggle to get the height off as it is for Runway 34 and you want to make them stay higher for longer? This just shows a lack of investigation into the airspace usage. This will not stop the infringements! And it will not stop here. The constant chipping away will continue. This has the potential to cause more issues than it solves!	May impact this proposal	Aberdeen Airport analysed surveillance radar data and liaised with ATC regarding the release of a portion of CAS. The data showed that no departures utilise that portion of airspace and on average only 1 fixed wing and 1 rotary aircraft arrival per week. This feedback has been categorised as "may impact the final proposal" and has been raised with the NATS ATC safety team for consideration within their consultation response (see below for Aberdeen ATC response).
Yes	It would make for safer airspace in that area	Will not impact the proposal	Thank you for your feedback
Yes	More space for general aviation to fly. Less chance of a CAS infringement. With the high ground nearby the MSA	Will not impact the proposal	Thank you for your feedback

‘You said’		‘We did’	
As a non-airspace user, do you support this proposal?	Please explain why	CAP1616 categorisation	Aberdeen Airport response
	(minimum sector altitude) will be such that IFR aircraft won't descend below that level anyway		
Yes	It's a good idea to reduce CAS volume where safe to do so.	Will not impact the proposal	Thank you for your support of our proposals
Yes	HIAL, Dundee, Inverness and Wick Airports have no objection to this change	Will not impact the proposal	Thank you.
Yes	Yes, releasing this section of airspace will be of great benefit to the GA community, without adversely affecting the overall ATC operation. There is an expected benefit in the reduction of Controlled Airspace infringements, particularly in the vicinity of Aboyne gliding site.	Will not impact this proposal.	This feedback was provided by Aberdeen ATC following the close of the consultation and after the feedback with concerns regarding safety (see above) had been shared with them.

Responses to ‘18. Thinking specifically of Controlled Airspace, do you have any further comments?’

3.5.18 The 10 respondents were then directed to a final question around CAS asking if they had any further comments.

3.5.19 Table 7 shows the details of the feedback and our response to question 18 ‘Thinking specifically of Controlled Airspace, do you have any further comments?’.

Table 7 'You said, we did' (Question 18)

'You said'	'We did' CAP1616 categorisation	Aberdeen Airport response
We need more not less!	May impact this proposal	This feedback has been categorised as "may impact the final proposal" and has been raised with the NATS ATC safety team for consideration within their consultation response.
Class D airspace is available to VFR traffic. All they need to do is call.	Will not impact the proposal	n/a

Responses to '19. Do you have any further feedback on this Airspace Change Proposal?'

- 3.5.20 All respondents were given a final opportunity to provide any further feedback on the overall Airspace Change Proposal as part of the 'Final thoughts' section on Citizen Space.
- 3.5.21 Table 8 shows the details of the feedback and our response to question 19 'Do you have any further feedback on this Airspace Change Proposal?'. 5 respondents either left the question blank or said they had no further feedback.

Table 8 'You said, we did' (Question 19)

'You said'	'We did' CAP1616 categorisation	Aberdeen Airport response
This seems a pointless and waste of money exercise to the detriment of Aberdeen Airport. Whoever thought this was a good idea should consider a new angle of attack to make Aberdeen airspace better.	Will not impact the proposal	No feedback provided that can be used to influence the design of the final proposal.
A good idea	Will not impact the proposal	Thank you for your support of our proposals
In the years I have never seen any aircraft within miles of the current airspace boundary and certainly not at the proposed height. I don't believe it will make any difference to commercial aircraft	Will not impact the proposal	Thank you for this information.
No real opinion on the PBN approaches, but certainly no objection to it. We welcome the proposal for the raised base of CTA-3	Will not impact the proposal	Thank you for your support of our proposals
Tay CTA is Class A and should be reclassified to Class D or E to permit VFR transits.	Will not impact the proposal	Changes to the Tay CTA are outside the scope of Aberdeen Airport's airspace change and would be undertaken by NATS NERL. We have shared your feedback with the NATS NERL Airspace Change team for their consideration
ASAP	Will not impact the proposal	Thank you for your support. We are working to implement the changes as quickly as possible within the timelines of the CAP1616 process.
Sooner if possible, please 😊	Will not impact the proposal	
The fact that there was a consultation exercise could have been much better publicised - it was really only by luck that we found out that changes which required to be consulted on were being considered	Will not impact the proposal	Thank you for your feedback. Due to the very limited scope of the changes with respect to local residents we proposed to undertake a targeted consultation (for more details, please see our consultation strategy).
The Deeside Gliding Club are very aware of the need for its pilots to avoid any breach of Airspace. This release will improve our ability to achieve that goal.	Will not impact the proposal	Thank you for your support of our proposals

'You said'	'We did' CAP1616 categorisation	Aberdeen Airport response
Good presentation and like the ideas. Hope the rest of the process goes well.	Will not impact the proposal	Thank you for your support of our proposals
MoD has no objection to either of the proposals in this ACP. Both are perceived as likely to be positive changes by defence airspace users.	Will not impact the proposal	Thank you for your support of our proposals
I welcome it	Will not impact the proposal	Thank you for your support of our proposals
I am supportive of this ACP and appreciate the engagement taken by Aberdeen Airport.	Will not impact the proposal	Thank you for your support of our proposals

4. Conclusion and next steps

- 4.1.1 Aberdeen Airport has carefully collated, reviewed and responded to all consultation feedback on the proposals to introduce PBN approaches for resilience and training, and to release a small section of CAS. For the proposed PBN approaches, we did not receive any consultation feedback which would impact the design. For the CAS proposal, we received three suggestions around visual features which will be considered, and one piece of feedback regarding safety which will be considered by ATC and, if applicable, fed into the safety assessment work undertaken in Stage 4. Throughout this document, the feedback which is highlighted in red will be carried forward to Stage 4 for further consideration.
- 4.1.2 As part of the next steps of the process, we will consider the feedback carried forward to Stage 4 when developing our final airspace change proposal. This proposal will then be appraised as part of the Final Options Appraisal. The information from the Final Options Appraisal will form part of the overall Stage 4 Airspace Change Proposal submission to the CAA.

5. Appendix A Full Consultation Feedback and Categorisation

5.1.1 Table 9 shows all the consultation responses received. At this stage, CAP1616 (3.29) requires us to categorise the feedback into ‘those that present information that may impact the final airspace change proposal, and those which do not’. Feedback categorised as ‘may impact the final proposal’ will be carried forward to Stage 4 for further consideration.

5.3.2 Any feedback categorised as 'may impact the final proposal' which will be carried forward for consideration as part of Stage 4 has been highlighted in red.

Table 9 Consultation feedback and categorisation (Red = may impact the final proposal)

Unique ID	What are your thoughts on the proposal to introduce PBN arrivals?	Do you have any further comments you would like to share about the proposed introduction of PBN arrivals at Aberdeen Airport?	Are you an airspace user?	As an airspace user, how satisfied are you with the proposed change?	Can you provide details on why you feel that way?	As an airspace user, in particular for GA (General Aviation) pilots, can you think of any visual features that could better define the boundary?	Thinking specifically of Controlled Airspace, do you have any further comments? (airspace user)	As a non-airspace user, do you support this proposal? – (Non-airspace user)	Please expand on your answer? (if required)	Thinking specifically of Controlled Airspace, do you have any further comments? (Non-airspace user)	Do you have any further feedback on this Airspace Change Proposal?
Received post consultation close	From an ATC point of view, the introduction of PBN approaches is supported and encouraged. Reducing the reliance on ground based infrastructure adds better resilience to the operation without noticeably changing the profiles of inbound aircraft. Workload for controllers during ground based outages would potentially be decreased.	None	No	Not Answered	Not Answered	Not Answered	Not Answered	Yes	Yes, releasing this section of airspace will be of great benefit to the GA community without adversely affecting the overall ATC operation. There is an expected benefit in the reduction of Controlled Airspace infringements, particularly in the vicinity of Aboyne gliding site.	None	I am supportive of this ACP and appreciate the engagement taken by Aberdeen Airport.

Unique ID	What are your thoughts on the proposal to introduce PBN arrivals?	Do you have any further comments you would like to share about the proposed introduction of PBN arrivals at Aberdeen Airport?	Are you an airspace user?	As an airspace user, how satisfied are you with the proposed change?	Can you provide details on why you feel that way?	As an airspace user, in particular for GA (General Aviation) pilots, can you think of any visual features that could better define the boundary?	Thinking specifically of Controlled Airspace, do you have any further comments? (airspace user)	As a non-airspace user, do you support this proposal? – (Non-airspace user)	Please expand on your answer? (if required)	Thinking specifically of Controlled Airspace, do you have any further comments? (Non-airspace user)	Do you have any further feedback on this Airspace Change Proposal?
Received post consultation close	Loganair are broadly supportive of the introduction of PBN/RNP approaches. Many of the airports that we operate to, both in the UK or Europe already utilise these approaches. Loganair aircraft/crew can typically fly to LNAV minima, which tends to be higher than the equivalent ILS approach. For this reason, it is unlikely that we would utilise the RNP approaches often, unless for training purposes. The RNP approaches would provide good resilience if either ILS system were to be unservicable.	In keeping with our previous responses regarding the introduction of PBN arrivals, we'd like reassurance that the existing conventional approaches will remain available. These conventional methods will usually allow us to fly to slightly lower minima, and also allows for the rare occasion that an aircraft cannot fly an RNP approach. This could be due to an aircraft defect, or if the area/airport is subject to GPS jamming.	Not Answered	Not Answered	Not Answered	Not Answered	Not Answered	Not Answered	Not Answered	Not Answered	Not Answered
410362162	Good. About time. However a lot of expense for little reward. Perhaps work on lowering charges for airlines and passengers to draw them back to the airfield instead of raising them.	They are fine but not essential. What is essential seems to be bypassing the airport management.	No, but I would like to respond	n/a	n/a	n/a	n/a	No	Do NOT release this airspace! The gliding and other users have hundreds of miles of open air. ATC at Aberdeen and the airlines do not. Aircraft struggle to get the height off as it is for Runway 34 and you want to make them stay higher for longer? This just shows a lack of investigation into the airspace usage. This will not stop the infringements! And it will not stop here. The constant chipping away will continue. This has the	We need more not less!	This seems a pointless and waste of money exercise to the detriment of Aberdeen Airport. Whoever thought this was a good idea should consider a new angle of attack to make Aberdeen airspace better.

Unique ID	What are your thoughts on the proposal to introduce PBN arrivals?	Do you have any further comments you would like to share about the proposed introduction of PBN arrivals at Aberdeen Airport?	Are you an airspace user?	As an airspace user, how satisfied are you with the proposed change?	Can you provide details on why you feel that way?	As an airspace user, in particular for GA (General Aviation) pilots, can you think of any visual features that could better define the boundary?	Thinking specifically of Controlled Airspace, do you have any further comments? (airspace user)	As a non-airspace user, do you support this proposal? – (Non-airspace user)	Please expand on your answer? (if required)	Thinking specifically of Controlled Airspace, do you have any further comments? (Non airspace user)	Do you have any further feedback on this Airspace Change Proposal?
555556404	Fantastic idea to modernise the process of landing	None	No, but I would like to respond	n/a	n/a	n/a	n/a	Yes			None
835854694	They should be implemented sooner rather than later and be used for all air traffic.		No, but I would like to respond	n/a	n/a	n/a	n/a	Yes	It would make for safer airspace in that area		No
744519638	The way forward. many, many airports have these procedures (including smaller, local aerodromes) and are a back up to existing navigational aids if they were to fail. Also aircraft that fly these PBN approaches tend to fly at the optimum level, speeds, therefore reducing emissions etc		No, but I would like to respond	n/a	n/a	n/a	n/a	Yes	More space for general aviation to fly. Less chance of a CAS infringement. With the high ground nearby the MSA (minimum sector altitude) will be such that IFR aircraft won't descend below that level anyway		A good idea
17392519			Yes	Satisfied	As we fly from Aboyne we are right on the edge of current airspace it is to easy to find ourselves straying into airspace. With easterly winds the current 3000 ft is a nightmare we end up way downwind struggling to get back as we are unable to be downwind to the	Unfortunately very little obvious markers currently exist.		n/a	n/a	n/a	In the years I have never seen any aircraft within miles of the current airspace boundary and certainly not at the proposed height. I don't believe it will make any difference to commercial aircraft

Unique ID	What are your thoughts on the proposal to introduce PBN arrivals?	Do you have any further comments you would like to share about the proposed introduction of PBN arrivals at Aberdeen Airport?	Are you an airspace user?	As an airspace user, how satisfied are you with the proposed change?	Can you provide details on why you feel that way?	As an airspace user, in particular for GA (General Aviation) pilots, can you think of any visual features that could better define the boundary?	Thinking specifically of Controlled Airspace, do you have any further comments? (airspace user)	As a non-airspace user, do you support this proposal? – (Non-airspace user)	Please expand on your answer? (if required)	Thinking specifically of Controlled Airspace, do you have any further comments? (Non-airspace user)	Do you have any further feedback on this Airspace Change Proposal?
-----------	---	---	---------------------------	--	---	--	---	---	---	---	--

east this change would allow for safer flying ensuring no airspace infringements.

34070209	I believe that the introduction of PBN arrivals will further aid controllers with traffic separation and flow, with an ultimate view to saving time for pilots, passengers etc. More importantly, the PBN arrivals can be introduced without having any affects on current approach procedures into Aberdeen. The PBN arrivals also streamline the options available to many types of aircraft. Although in the very early stages, I believe that we could see PBN arrivals become more common up and down the UK. Finally, the PBN arrivals will extend the options available to pilots in different meteorological conditions and operations environments.	I would like to see more data that shows how current emissions of greenhouse gases, noise and air pollution are going to be affected, once the ball gets rolling with the introduction of PBN arrivals.	Yes	Satisfied	The proposed change provides a range of benefits to pilots at Deeside Gliding Club, in that cross country flights will be easier to plan, and execute. The change also reduces the chances of potential airspace infringements, and makes entry negotiations easier.	Visual features could include the addition of more visual reference points (VRPs) near the boundary, or VFR checkpoints.	n/a	n/a	n/a	n/a
----------	--	---	-----	-----------	--	--	-----	-----	-----	-----

Unique ID	What are your thoughts on the proposal to introduce PBN arrivals?	Do you have any further comments you would like to share about the proposed introduction of PBN arrivals at Aberdeen Airport?	Are you an airspace user?	As an airspace user, how satisfied are you with the proposed change?	Can you provide details on why you feel that way?	As an airspace user, in particular for GA (General Aviation) pilots, can you think of any visual features that could better define the boundary?	Thinking specifically of Controlled Airspace, do you have any further comments? (airspace user)	As a non-airspace user, do you support this proposal? – (Non-airspace user)	Please expand on your answer? (if required)	Thinking specifically of Controlled Airspace, do you have any further comments? (Non airspace user)	Do you have any further feedback on this Airspace Change Proposal?
344767410	The PBN arrivals are probably a necessary next step in the airspace modernisation programme, even though they will be little used due to the more flexible traffic vectoring that occurs at Aberdeen. We cannot see that the existence of these arrivals will have any significant negative impact, and so we are supportive.	The recent proliferation of not just GPS jamming but GPS spoofing in some areas of the world, demonstrates how fragile a PBN approach could be. Perhaps ANSPs such as Aberdeen need to have a strategy for detecting and dealing with such an event, even though it may be relatively unlikely to occur in UK airspace.	Yes	Satisfied	Aberdeen airport is to be congratulated on agreeing to raise the level of the CAS fillet adjacent to Deeside Gliding club, and in this latest iteration extend the raised portion further east. Airports voluntarily giving up airspace is a rare event! Thank you.	All glider pilots flying from Deeside Gliding Club will have moving map displays showing the airspace boundaries, and so it does not particularly matter to us if the boundaries are not well defined by ground features. We are content with the proposed boundary.		n/a	n/a	n/a	No real opinion on the PBN approaches, but certainly no objection to it. We welcome the proposal for the raised base of CTA-3
298029762	Great. 👍	None.	Yes	Satisfied	Release of airspace no longer needed by Aberdeen would be welcome.		Clearances into controlled airspace should still be as straightforward after the base level raise.	n/a	n/a	n/a	Tay CTA is Class A and should be reclassified to Class D or E to permit VFR transits.
737826910			Yes	Satisfied	Any release of controlled airspace is a good thing after all gliders existed before power planes	I don't access CTA3 so I couldn't say	I don't use controlled airspace as a refusal is the normal ATC response	n/a	n/a	n/a	ASAP
681522923	A sensible enough step but assuming there is an increase in the use of PBN systems is a single waypoint sufficient?	The material available at the public consultation on 21st May at the Science Centre was instructive and informative. Our questions were answered by the representatives from Arup and AGS	No, but I would like to respond	n/a	n/a	n/a	n/a	Yes			The fact that there was a consultation exercise could have been much better publicised - it was really only by luck that we found out that changes which required to be consulted on were being considered

Unique ID	What are your thoughts on the proposal to introduce PBN arrivals?	Do you have any further comments you would like to share about the proposed introduction of PBN arrivals at Aberdeen Airport?	Are you an airspace user?	As an airspace user, how satisfied are you with the proposed change?	Can you provide details on why you feel that way?	As an airspace user, in particular for GA (General Aviation) pilots, can you think of any visual features that could better define the boundary?	Thinking specifically of Controlled Airspace, do you have any further comments? (airspace user)	As a non-airspace user, do you support this proposal? – (Non-airspace user)	Please expand on your answer? (if required)	Thinking specifically of Controlled Airspace, do you have any further comments? (Non-airspace user)	Do you have any further feedback on this Airspace Change Proposal?
751952168	Long overdue 😊	Excellent idea	Yes	Satisfied	<p>This comment was created by former CFI (myself) and Club Airspace Officer, who both attended the meeting 13 June</p> <p>Summary Deeside Gliding Club supports the proposed raising of lower height limit in the western part of what is currently CTA3.</p> <p>There are potential operational and safety gains for the club.</p> <p>Operations. When There is an Easterly wind, gliders at present, can only be towed approximately 1 nm to the east until reaching the CTA boundary at 2500 feet AAL, (3000 ft AMSL)</p> <p>The increased height limit will permit less constrained training flights, is not having to compensate for the westerly drift, since we will be able to tow further</p>	Insch VRP at north, unsure from supplied maps about southern point.	None	n/a	n/a	n/a	Sooner if possible, please 😊

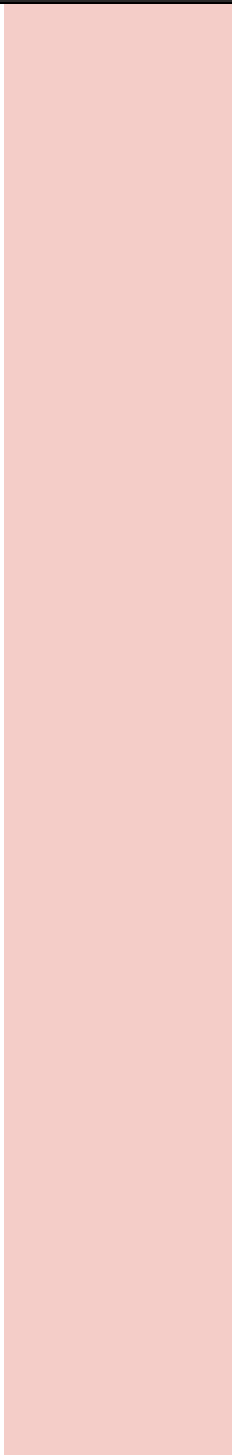
Unique ID	What are your thoughts on the proposal to introduce PBN arrivals?	Do you have any further comments you would like to share about the proposed introduction of PBN arrivals at Aberdeen Airport?	Are you an airspace user?	As an airspace user, how satisfied are you with the proposed change?	Can you provide details on why you feel that way?	As an airspace user, in particular for GA (General Aviation) pilots, can you think of any visual features that could better define the boundary?	Thinking specifically of Controlled Airspace, do you have any further comments? (airspace user)	As a non-airspace user, do you support this proposal? – (Non-airspace user)	Please expand on your answer? (if required)	Thinking specifically of Controlled Airspace, do you have any further comments? (Non-airspace user)	Do you have any further feedback on this Airspace Change Proposal?
-----------	---	---	---------------------------	--	---	--	---	---	---	---	--

upwind.
 . It will also open lower altitude soaring opportunities well to the East, without requiring ATC contact.

Safety.
 Occasionally gliders flying above cloud may be caught out by closing "wave gaps", ie the clear air gap between lenticular clouds closes as more humid air blows from SW through W to NW.

Those who do not descend in time may require to descend through cloud, or penetrate the CTA to descend further downwind in VMC.

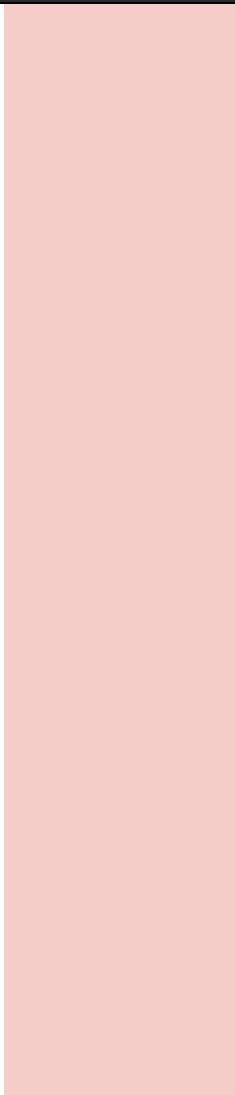
The workload of navigating, maintaining control in reducing visual conditions and talking to ATC is significant, and this raising of the lower limit may relieve a glider pilot of the communications task in the designated



Unique ID	What are your thoughts on the proposal to introduce PBN arrivals?	Do you have any further comments you would like to share about the proposed introduction of PBN arrivals at Aberdeen Airport?	Are you an airspace user?	As an airspace user, how satisfied are you with the proposed change?	Can you provide details on why you feel that way?	As an airspace user, in particular for GA (General Aviation) pilots, can you think of any visual features that could better define the boundary?	Thinking specifically of Controlled Airspace, do you have any further comments? (airspace user)	As a non-airspace user, do you support this proposal? – (Non-airspace user)	Please expand on your answer? (if required)	Thinking specifically of Controlled Airspace, do you have any further comments? (Non-airspace user)	Do you have any further feedback on this Airspace Change Proposal?
-----------	---	---	---------------------------	--	---	--	---	---	---	---	--

area below the new limit.
Or indeed permit a VMC descent, again respecting these new boundaries, albeit probably downwind of the club..

Deeside Gliding Club welcomes this proposed change.



Unique ID	What are your thoughts on the proposal to introduce PBN arrivals?	Do you have any further comments you would like to share about the proposed introduction of PBN arrivals at Aberdeen Airport?	Are you an airspace user?	As an airspace user, how satisfied are you with the proposed change?	Can you provide details on why you feel that way?	As an airspace user, in particular for GA (General Aviation) pilots, can you think of any visual features that could better define the boundary?	Thinking specifically of Controlled Airspace, do you have any further comments? (airspace user)	As a non-airspace user, do you support this proposal? – (Non-airspace user)	Please expand on your answer? (if required)	Thinking specifically of Controlled Airspace, do you have any further comments? (Non-airspace user)	Do you have any further feedback on this Airspace Change Proposal?
571146832	As a GA representative, PBN arrival have no material impact upon our activity so cannot express an informed opinion on this proposal.	NO	Yes	Satisfied	As a representative of the GA community, in particular, Gliding at the Deeside Gliding Club based just to the east of Aboyne, the release of airspace markedly impacts both safety close to the site and increases operational efficiency. Safety is improved as take off and landing activity in close proximity to controlled airspace will not be so tightly constrained with an increase in ceiling to 4,500 asl. immediately to the east of the airfield. Operational efficiency will be improved. The glider drop zone has been limited to overhead or west of the airfield due to the restricted base of the airspace. This limits dropping gliders upwind of the airfield in easterly wind directions. Also, soaring to the east is similarly limited. Raising the base of airspace to effectively 4,000' above	Invercannie Water Works might be a useful feature on the eastern edge of the airspace release area.		n/a	n/a	n/a	The Deeside Gliding Club are very aware of the need for its pilots to avoid any breach of Airspace. This release will improve our ability to achieve that goal.

Unique ID	What are your thoughts on the proposal to introduce PBN arrivals?	Do you have any further comments you would like to share about the proposed introduction of PBN arrivals at Aberdeen Airport?	Are you an airspace user?	As an airspace user, how satisfied are you with the proposed change?	Can you provide details on why you feel that way?	As an airspace user, in particular for GA (General Aviation) pilots, can you think of any visual features that could better define the boundary?	Thinking specifically of Controlled Airspace, do you have any further comments? (airspace user)	As a non-airspace user, do you support this proposal? – (Non-airspace user)	Please expand on your answer? (if required)	Thinking specifically of Controlled Airspace, do you have any further comments? (Non-airspace user)	Do you have any further feedback on this Airspace Change Proposal?
162204030	The BMAA supports the proposal to introduce PBN arrivals, although this is unlikely to affect our members.		Yes	Satisfied	the site will markedly increase access to the east. It is general BMAA policy to support the release of unnecessary controlled airspace.	No	No	n/a	n/a	n/a	No
1012726339	I think PBN arrivals are an excellent idea and the sooner they are introduced, the sooner the benefit will be experienced by airspace users.	No just good luck with the implementation.	No, but I would like to respond	n/a	n/a	n/a	n/a	Yes	It's a good idea to reduce CAS volume where safe to do so.	Class D airspace is available to VFR traffic. All they need to do is call.	Good presentation and like the ideas. Hope the rest of the process goes well.
19700895	HIAL,Dundee,Inverness and Wick Airports have no comments on the introduction of PBN approached at Aberdeen Airport	No	No, but I would like to respond	n/a	n/a	n/a	n/a	Yes	HIAL,Dundee,Inverness and Wick Airports have no objection to this change	Nil	None
489389850	Predominantly nil impact to MoD. The introduction of PBN arrivals to Aberdeen may positively influence the airport's availability as a diversion for suitably equipped MoD aircraft.	Nil.	Yes	Satisfied	The raising of CAS base level simplifies low level flying operations in this area.	N/A	Nil.	n/a	n/a	n/a	MoD has no objection to either of the proposals in this ACP. Both are perceived as likely to be positive changes by defence airspace users.

Unique ID	What are your thoughts on the proposal to introduce PBN arrivals?	Do you have any further comments you would like to share about the proposed introduction of PBN arrivals at Aberdeen Airport?	Are you an airspace user?	As an airspace user, how satisfied are you with the proposed change?	Can you provide details on why you feel that way?	As an airspace user, in particular for GA (General Aviation) pilots, can you think of any visual features that could better define the boundary?	Thinking specifically of Controlled Airspace, do you have any further comments? (airspace user)	As a non-airspace user, do you support this proposal? – (Non-airspace user)	Please expand on your answer? (if required)	Thinking specifically of Controlled Airspace, do you have any further comments? (Non-airspace user)	Do you have any further feedback on this Airspace Change Proposal?
-----------	---	---	---------------------------	--	---	--	---	---	---	---	--

525476046	Sensible proposals	Positive move	No, but I would like to respond	n/a	n/a	n/a	n/a	Yes			I welcome it
1008238268	NATS NERL plc believes that the introduction of PBN operations is a positive step	Noting the limited use of the PBN approach - If there were a change in circumstance, then the environmental element would need to be re-examined.	No, but I would like to respond	n/a	n/a	n/a	n/a	Yes	N/A	Nil	N/A