



HIAL Consultation Report

Proposal for the Introduction of Controlled Airspace and Optimisation of Instrument Flight Procedures at Inverness Airport

Consultation Report

Release Date: 10th August 2015

Prepared for: Highlands and Islands Airports Limited (HIAL)
Contract Number: HIAL841
Sponsor Consultation Document

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INVERNESS AIRPORT AIRSPACE CONSULTATION
Issue 2



Revision History

Issue	Change	Date	Information
7550/037			
Issue 002.0	IGAFG Members	10 Aug 15	

Distribution

Copy	Organisation
Controlled	HIAL Website



Executive Summary

Highlands and Islands Airports Limited (HIAL) is the Sponsor of a proposed change to the current arrangements and procedures in the immediate airspace surrounding Inverness Airport. The proposed change will provide enhanced protection to aircraft on the critical stages of flight in departure and final approach.

As part of the Civil Aviation Authority's (CAA) Guidance on the Application of the Airspace Change Process (Civil Aviation Publication (CAP) 725) [Reference 1], HIAL is required to submit a case to the CAA to justify its proposed Airspace Change, and to undertake consultation with all relevant stakeholders. This ensures that all stakeholders who may be directly or indirectly affected by the proposed change have an opportunity to provide comment on the proposal, as well as highlighting any environmental impacts that the proposed airspace change may have.

HIAL has engaged Osprey Consulting Services Ltd (Osprey) to project manage the Airspace Change Process on their behalf. The Inverness Airport airspace change is hereafter referred to as 'the proposal'.

This document is a Report on the consultation carried out by HIAL between 29th September and 19th April in accordance with the requirements of CAA CAP 725 [Reference 1]. It includes an analysis of all submissions received throughout the consultation and identifies the main issues raised by consultees. It also provides HIAL's views in relation to those issues and outlines, importantly, post-consultation action taken, or planned, by HIAL in order to mitigate the concerns reflected in stakeholder responses.

This document will form part of the Airspace Change Proposal (ACP) submission to the CAA. The ACP will detail the case for the proposed change to the current arrangements and procedures in the immediate airspace surrounding Inverness Airport.

Subject of the Consultation

The purpose of this consultation was to gather and analyse the views of the various stakeholders concerning a proposal to change the current arrangements and procedures in the immediate airspace surrounding Inverness Airport. Fundamentally, the consultation enabled HIAL to obtain or confirm views and opinions about the potential impact of the proposed airspace change.

Consultees

The Consultation Document was circulated to a total of 145 consultee organisations or individuals. Of these, 10 consultation emails were returned as undelivered, making the total number of consultees equal to 135. The aviation consultees included aviation parties such as the Ministry of Defence (MOD), airlines, aircraft operators, adjacent aerodromes, all local airspace users and the national bodies representing all UK aviation interests who may be affected by the proposed changes. National bodies such as the Light Aircraft Association (LAA), the British Airline Pilots' Association (BALPA), and the Airport Operators Association (AOA) were represented through the auspices of the National Air Traffic Management Advisory Committee (NATMAC), sponsored by the CAA. A number of military organisations are also members of the NATMAC.



Non-aviation stakeholders for consultation included environmental and heritage organisations, local planning authorities and the general public. In addition, the views of individual members of the public were welcomed.

Consultation Statistics

A total of 26 responses (19.3 %) responses were received from the 135 consultees contacted.

In addition, HIAL received a total of 90 responses from other individual members of the General Aviation (GA) fraternity and other parties who were not included in the formal consultee list.

Of the 116 responses received; 5 consultees supported the proposal; 99 consultees objected to the proposal; and 12 consultees provided a neutral response, whereby the consultee did not object or provided no comments on the proposal.

HIAL Conclusions

The Consultation has produced a significant opposition from the local GA community supported by the GA Alliance and the LAA Highland and Islands Strut. The foci of concern are as follows:

- The extent of the suggested Controlled Airspace (CAS) is disproportionate to density of commercial activity at Inverness Airport;
- Access arrangements to the CAS;
- The base level of some Control Areas within the overall CAS design; and
- The future impact of the Standardised European Rules of the Air (SERA), specifically the changes to visual flight requirements within CAS.

The Consultation has also raised objection from the MOD based predominantly upon access arrangements to the proposed Controlled Airspace.

HIAL is addressing these concerns in further discussions with the MOD and local GA communities (led by the GA Alliance). It is anticipated that following these discussions a further period of Consultation will take place in the latter part of 2015.

Next Stages

HIAL will submit a formal ACP, following a further stage of consultation, reflecting changes made to the airspace design to mitigate the expressed stakeholder concerns detailed in this document. The ACP will be submitted to the Safety and Airspace Regulation Group (SARG) of the CAA detailing the case for the proposed change in airspace once further analysis has been completed.

Following receipt of the formal ACP, the CAA will assess the documentation to determine if there is sufficient information presented on which to base a decision. Thereafter a 16-week period follows during which the CAA conducts its own internal analysis of the final proposal and consultation results, before arriving at a Regulatory Decision.

HIAL extend their thanks to all consultees and other individuals who took the time to participate in this consultation and for their very useful feedback.



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1 Glossary

Acronym	Meaning
ACC	Airport Consultative Committee
ACP	Airspace Change Proposal
ADI	Aerodrome Control Instrument
ADR	Advisory Route
AEF	Air Experience Flight
agl	Above ground level
AIP	Aeronautical Information Publication
AIRAC	Aeronautical Information Regulation and Control
AOA	Airport Operators Association
AOPA	Aircraft Owners and Pilots Association
APS	Approach Control Surveillance
AR	Airspace Regulation
ARPAS	Association for Remotely Piloted Aircraft Systems
ASL	Above Sea Level
ATC	Air Traffic Control
ATM	Air Traffic Management
ATS	Air Traffic Service
AWY	Airway
BAA	British Airports Association
BABO	British Association of Balloon Operators
BALPA	British Airline Pilots' Association
BATA	British Air Transport Association



Acronym	Meaning
BBAC	British Balloon and Airship Club
BBGA	British Business and General Aviation Association
BGA	British Gliding Association
BHA	British Helicopter Association
BHPA	British Hand Gliding and Paragliding Association
BMAA	British Microlight Aircraft Association
BMFA	British Model Flying Association
BPA	British Parachute Association
CAA	Civil Aviation Authority
CAP	Civil Aviation Publication
CAS	Controlled Airspace
CAT	Commercial Air Traffic
CCD	Continuous Climb Departure
CDA	Continuous Descent Approach
CFIT	Controlled Flight Into Terrain
CNS	Communication, Navigation & Surveillance
CTA	Control Area (Class D UK Airspace)
DAATM	Defence Airspace and Air Traffic Management
DAP	Directorate of Airspace Policy (part of the CAA – now SARG)
DfT	Department for Transport
ELFAA	European Low Fares Airline Association
FIR	Flight Information Region
FMS	Flight Management System
ft	Feet
GA	General Aviation



INVERNESS AIRPORT AIRSPACE CONSULTATION
Issue 2



Acronym	Meaning
GASCo	General Aviation Safety Council
GAT	General Air Traffic
GAPAN	Guild of Air Pilots and Air Navigators
GATCO	Guild of Air Traffic Control Officers
GPS	Global Positioning System
HCGB	Helicopter Club of Great Britain
HQ DAAvn	Headquarters Director Army Aviation
HTZ	Helicopter Traffic Zone
IAIP	Integrated Aeronautical Information Package
IFP	Instrument Flight Procedure
IGAFG	Inverness General Aviation Focus Group
IMC	Instrument Meteorological Conditions
IoMA	Isle of Man Airport
LAA	Light Aircraft Association
LoA	Letter of Agreement
MAA	Military Aviation Authority
MATZ	Military Air Traffic Zone
MSA	Minimum Safe Altitude
MOD	Ministry of Defence
NAP	Noise Abatement Procedure
NATMAC	National Air Traffic Management Advisory Committee
NATS	The National Air Traffic Service Provider
NERL	NATS En-Route Ltd
NCHQ	Navy Command Head Quarters
NM	Nautical Miles



Acronym	Meaning
NPC	NATS Prestwick Centre
NPR	Noise Preferential Route
OS	Ordnance Survey
PSR	Primary Surveillance Radar
RAF	Royal Air Force
RMZ	Radio Mandatory Zone
RPAS	Remotely Piloted Aircraft Systems
RTF	Radiotelephony
SARG	CAA Safety and Airspace Regulation Group
SERA	Standard European Rules of the Air
SRG	Safety Regulation Group (part of the CAA)
SVFR	Special Visual Flight Rules
TMA	Terminal Control Area
TMZ	Transponder (SSR) Mandatory Zone
UAS	University Air Squadron
UAV	Unmanned Air Vehicles
UKAB	UK Airprox Board
UKFSC	UK Flight Safety Committee
VFR	Visual Flight Rules
VGS	Volunteer Gliding Squadron
VMC	Visual Meteorological Conditions
VOR	VHF Omni Directional Radio Range; a type of short-range radio navigation system for aircraft
WAL	Wallasey VOR



2 Introduction

This document is a Report of the consultation carried out by Highlands and Islands Airports Limited (HIAL) between 29th September 2014 and 19th April 2015, on the proposed change to the current arrangements and procedures in the immediate airspace surrounding Inverness Airport. The aim of this report is to present details on the statistical data arising from the responses to the consultation, together with an analysis of the feedback received.

2.1 General

HIAL is the sponsor for a proposed change to the current arrangements and procedures in the immediate airspace surrounding Inverness Airport, to provide enhanced protection to aircraft on the critical stages of flight in departure and final approach.

As part of the Civil Aviation Authority's (CAA) Guidance on the Application of the Airspace Change Process (Civil Aviation Publication (CAP) 725) [Reference 1], HIAL is required to submit a case to the CAA to justify its proposed airspace change, and to undertake consultation with all relevant stakeholders. This ensures that all stakeholders who may be directly or indirectly affected by the proposed change have an opportunity to provide comment on the proposal, as well as highlighting any environmental impacts that the proposed airspace change may have.

HIAL has engaged Osprey Consulting Services Ltd (Osprey) to project manage the Airspace Change Process on their behalf. The Inverness Airport airspace change is hereafter referred to as 'the proposal'.

This document is a Report on the consultation carried out by HIAL between 29th September 2014 and 19th April 2015. The background to this consultation and the methodology used are detailed in Annex A1 to this document. The aim of this report is to present details on the statistical data arising from the responses to the consultation, together with an analysis of the feedback received. This Report replaces the Interim Report published on the HIAL website on 8th December 2014.

HIAL would like to thank all consultees and other individuals who took the time to participate in this consultation and for their very useful feedback.

2.2 Subject of the Consultation

The purpose of this consultation was to gather and analyse the views of the various stakeholders concerning a proposal to establish Controlled Airspace (CAS), Class D and Class E + Transponder Mandatory Zone (TMZ), surrounding Inverness Airport.

Fundamentally, the consultation will enable HIAL to obtain or confirm views and opinions about the impact of the proposed airspace change.



The overall aim of the HIAL Airspace Change Proposal (ACP) is to enhance safety and improve the efficiency of Inverness Airport operations. This will be achieved through:

- The design of CAS to adequately contain current and future Inverness Airport published Instrument Flight Procedures (IFPs); and
- The provision of lateral separation of arrival and departure routes introducing Continuous Descent Approaches (CDAs) and Continuous Climb Departures (CCDs).

HIAL, as the sponsor of the proposed airspace change, is required to submit a case to the CAA to justify the change in airspace surrounding Inverness Airport. In addition, as part of the CAA's ACP, it is HIAL's responsibility to consult with all relevant stakeholders who may be directly or indirectly affected by the proposal. This document provides HIAL's views in relation to stakeholder concerns and outlines post-consultation action taken, or planned, by HIAL in order to mitigate these stakeholder concerns.

2.3 Development of the Consultee List

A full list of consultees was developed with the advice of the CAA and is given at Annex A2.

At the start of the consultation, HIAL sent out notification to 145 consultees, comprising:

- 38 Aviation "National Organisations" (CAA National Air Traffic Advisory Committee (NATMAC list);
- 19 Airport Users;
- 10 Local Aerodromes/Aviation Consultees;
- 4 Members of Parliament (MP);
- 11 Members of The Scottish Parliament (MSP);
- 13 Council Wards and Local Authorities;
- 6 Local/National Environmental Organisations; and
- 44 General Aviation (GA) Individuals (GA Focus Group (IGAFIG) members).

Of these, 10 emails were returned as undelivered. Therefore the total number of consultees that received the consultation email was 135.

Further detail on the categories of consultee organisations is provided in Section 3.2 of this report.

2.4 Confidentiality

The CAA Safety and Airspace Regulation Group (SARG) requires that all consultation material, including copies of responses from consultees and others, is included in any formal submission to the CAA of an ACP.

HIAL undertakes that, apart from the necessary submission of material to the CAA and essential use by Osprey for analytical purposes in developing this Report and subsequent ACP material, HIAL will not disclose personal details or content of responses or submissions to any third parties. Osprey and HIAL consultants are signatories to confidentiality agreements in this respect.



2.5 Document structure

This document contains six main sections and four Annexes, outlined below for convenience:

- Section 1 provides a glossary;
- Section 2, this section, introduces the document;
- Section 3 details the consultation statistics;
- Section 4 provides an overview of the responses, support ratio and objections raised;
- Section 5 outlines the next stages with respect to the HIAL ACP; and
- Section 6 provides a list of references.

There are four Annexes:

- Annex A1 details the background to this consultation and the consultation methodology;
- Annex A2 lists the consultees;
- Annex A3 details the key issues and areas of concern arising from this consultation; and
- Annex A4 illustrates the consulted airspace design.



3 Consultation Statistics

The HIAL Airspace Change consultation invitations were circulated to a total of 145 stakeholder consultee organisations or individuals, of which 10 were returned as undelivered. The Consultation Document was also posted on the HIAL/Inverness website. A total of 116 responses to this consultation were received, of which 90 were submitted by individuals or parties that were not included in the original consultee list.

3.1 Overview

This section describes the categories of consultee organisations and individuals that were contacted and gives a breakdown of the responses received.

3.2 Consultee Organisations

The HIAL Airspace Change consultation invitations were circulated to a total of 145¹ stakeholder consultee organisations or individuals detailed in Annex A2.

As stated in Section 2.3, 10 consultation emails were returned as undelivered, making the total number of consultees equal to 135.

The consultation document was distributed via a dedicated link on the HIAL website² through email to all listed consultees.

Consultees broadly fall into two categories:

- Aviation consultees; and
- Non-aviation consultees.

Aviation consultees included aviation parties such as the MOD, airlines, aircraft operators, adjacent aerodromes, all local airspace users and the national bodies representing all UK aviation interests who may be affected by the proposed changes. National bodies such as the Light Aircraft Association (LAA), British Airline Pilots Association (BALPA), Airport Operators Association (AOA) etc. are represented through the auspices of the NATMAC, sponsored by the CAA. A number of military organisations are also members of the NATMAC.

Non-aviation stakeholders consulted includes environmental and heritage organisations, local planning authorities and the public. The consultee groups are detailed in Figure 1 below.

¹ It should be noted that NATMAC comprises a total of 38 organisations; this analysis reflects the views of the organisations as a whole and not of the individuals representing them.

² <http://www.hial.co.uk/inverness-airport/jet-centre/nats-nautical-information-service/>

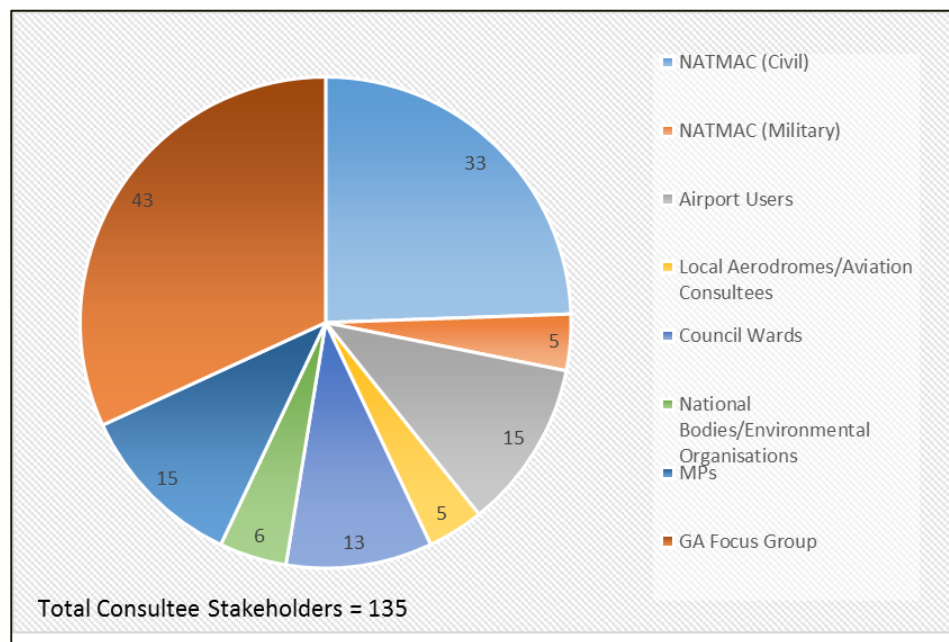


Figure 1 Distribution of Consultees

3.3 Responses

A total of 26 responses (19.3 %) to this consultation were received from consultees. A breakdown of these is provided in Table 1 and Figure 2 below.

	Consultee Group	Number Consulted	Responses	%
1	NATMAC (Civil)	33	11	33.33
2	NATMAC (Military) ³	5	1	20.00
3	Airport Users	15	3	20.00
4	Local Aerodromes/Aviation Consultees	5	4	80.00
5	MPs	15	0	0
6	Council Wards	13	2	15.38
7	National Bodies/Environmental Organisations	6	2	33.33

³ The Defence Aviation and Air Traffic Management (DAATM)



	Consultee Group	Number Consulted	Responses	%
8	GA Focus Group	43	3	6.82
	Totals	135	26	19.3 %

Table 1 Responses from Consultees

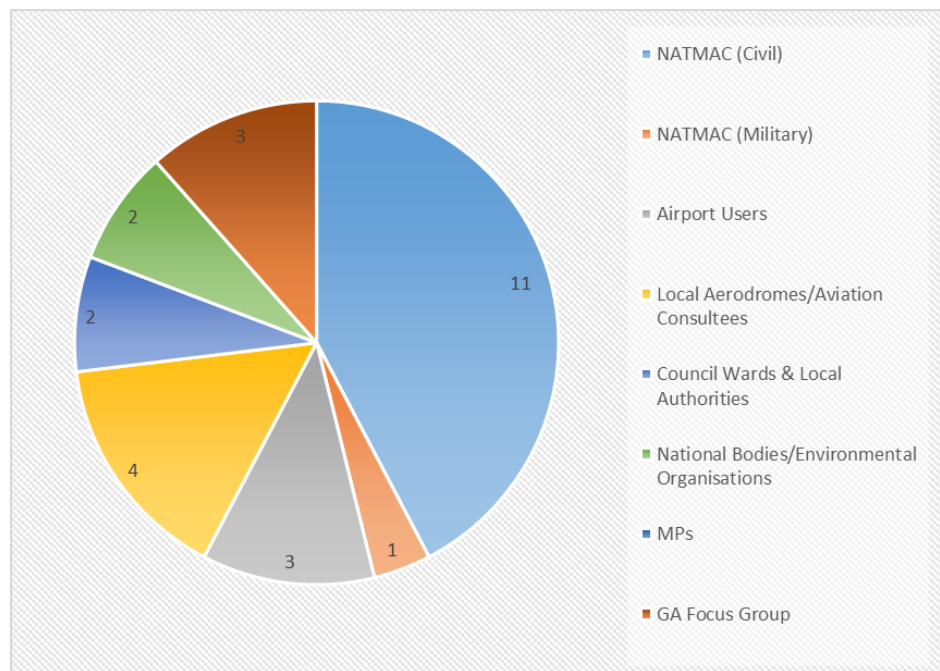


Figure 2 Breakdown of Consultee Responses Received

In addition to the 26 responses received from consultees (distribution shown in Figure 1), a further 90 submissions were received from other individuals or parties that were not included in the original consultee list, making the total number of responses equal to 116.

It should be noted that “NATMAC (Civil)” and “NATMAC (Military)” comprise those organisations who are members of the CAA’s NATMAC. The NATMAC consultee list includes some CAA Departments who, for reasons of CAA impartiality, do not respond to consultations.

MOD provided a consolidated response, through Defence Airspace and Air Traffic Management (DAATM), on behalf of all military consultees. This is standard MOD practice. Thus, all military consultees are deemed to have responded.

It is noted that the majority of responses received to date were from individuals that were not included in the formal consultee list detailed in Annex A2.



3.4 Meetings with Major Stakeholders

Prior to the commencement of the consultation period, a number of meetings were held with some of the major stakeholders. Although most of these organisations had been contacted during the initial requirements capture phase, the purpose of these meetings was to present the detail that would be incorporated into the Consultation Document to ensure there were no surprises for stakeholders when it came to formal comment.

Details of the pre-consultation meetings that were organised with the major stakeholders are given in Table 2 below.

Stakeholder	Meeting Date	Notes
Inverness General Aviation Focus Group (IGAFG)	21 st August 2013 31 st October 2013 4 th March 2014	Dialogue with this group, which contains representatives of the GA Alliance, local LAA & BGA, is continuing.
General Aviation Presentation	29 th July 2013	
Inverness Airport Consultative Committee (ACC)	30 th July 2013 4 th September 2013	
RAF Lossiemouth	28 th January 2013	On-going dialogue through the RAF Lossiemouth Airspace Users Group
Defence Airspace and Air Traffic Management (DAATM)	8 th July 2013 9 th September 2013	Along with the SARG Case Officer

Table 2 Pre-Consultation Stakeholder Meetings



4 Analysis of Responses

Of the 116 responses received in total, 5 supported the proposal, 99 consultees objected to the proposal and 12 consultees provided a neutral response, whereby they did not object or provided no comments on the proposal.

4.1 Introduction

This section provides details on the number of responses received from the various organisations and individuals that were consulted. It also explores the support ratio of consultee responses received to give a general indication on the stakeholder acceptance of this proposal.

4.2 Response Support Ratio

Of the 116 responses received during the consultation period:

- 5 consultees (4.3 %) supported the proposal;
- 99 consultees (85.3 %) objected to the proposal; and
- 12 consultees (10.3 %) provided a neutral response, whereby the consultee did not object or provided no comments on the proposal.

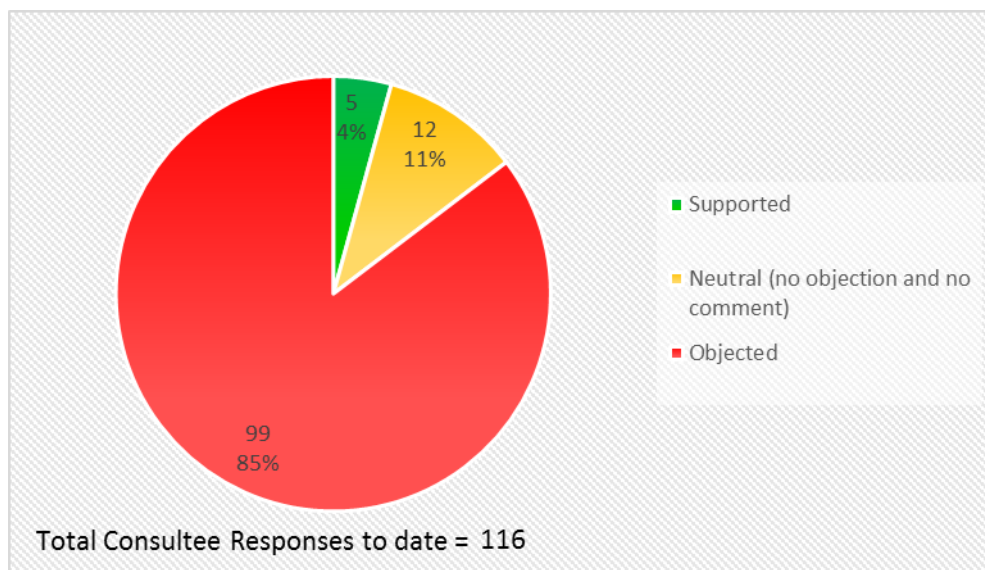


Figure 3 Support Ratio from All Responses Received

4.3 Submissions from Individuals and Other Parties

Of the 90 responses to the consultation received from those not in the formal consultee list, the majority were from GA and private pilots, some of whom are members of a local flying/gliding club.