

HIAL Consultation Report

Proposal for the Introduction of CAS Optimisation of IFPs at Inverness Airport

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Sponsor Addendum Consultation Document.

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Executive Summary

Inverness Airport supports a vital and effective national and international flight network to both the local community and wider Highlands area. Highlands and Islands Airports Limited (HIAL), owner and operator of Inverness Airport, has identified the need for changes to the current arrangements and procedures in the immediate airspace surrounding Inverness Airport. Advances in Air Traffic Management (ATM), airliner navigation and routing procedures plus General Aviation (GA) navigation are driving these changes. The purpose of this proposal is to deliver improved and efficient use of the surrounding airspace and provide procedures' protection to passenger airliners during critical stages of flight into and out of Inverness Airport; some environmental improvements and economic benefits (for airline operators) are anticipated. Arrival procedures for Visual Flight Rules (VFR), including General Aviation (Sports and Recreation) flights, will also be protected.

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'.

HIAL is developing the Airspace Change Proposal (ACP) in the interest of the travelling public and it's Air Traffic Service provision through the methodology directed by the Civil Aviation Publication (CAP) 725 Civil Aviation Authority (CAA) Guidance on the Application of the Airspace Change Process [Reference 1]. This process requires consultation on the proposed changes with all affected stakeholders. HIAL completed a first stage of consultation on an initial design of Controlled Airspace (CAS) for Inverness Airport in April 2015. Valuable and well-informed feedback was received from all those consulted and analysis of the responses highlighted some common themes. These concerns have led to a significant change in the design, in geographic extent, volume and type, of the proposal for CAS surrounding Inverness Airport in order to increase the flexibility for GA and Ministry of Defence (MOD) VFR operations within and around this CAS.

This document is a Report on the second stage of consultation carried out by HIAL between 5th August and 6th November 2016 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 proposal to amend 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 the proposal to amend 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 amendment.

Consultees

The Consultation Document was circulated to a total of 101 consultee organisations or individuals. Of these, 6 consultation emails were returned as undelivered, making the total number of consultees equal to 95. The 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), 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.

Addendum Consultation Statistics

A total of 17 responses (17.9 %) were received from the 95 consultees contacted.

In addition, HIAL received 88 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 105 responses received, 7 consultees supported the proposal; 94 consultees objected to the proposal; and 4 consultees provided a neutral response, whereby the consultee did not object or provided no comments on the proposal.

Next Stages

HIAL will submit a formal proposal, reflecting amendments 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 airspace proposal once further analysis has been completed.

Following receipt of the formal proposal, 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 or Area Control Centre
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
amsl	Above Mean Sea Level
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 or Air Traffic Movements
ATS	Air Traffic Service
AWY	Airway

Acronym	Meaning
BAA	British Airports Association
BABO	British Association of Balloon Operators
BALPA	British Airline Pilots' Association
BATA	British Air Transport Association
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)
CTR	Control Zone

Acronym	Meaning
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
FAI	Federation Aeronautic International
FAT	Final Approach Track
FIR	Flight Information Region
FL	Flight Level
FLARM	An EASA-approved electronic system used to selectively alert pilots to potential collisions between aircraft. It is not formally an implementation of ADS-B, as it is optimized for the specific needs of light aircraft, not for long-range communication or ATC interaction.
FMS	Flight Management System
ft	Feet
GA	General Aviation
GAA	General Aviation Alliance
GASCo	General Aviation Safety Council
GAT	General Air Traffic
GAPAN	Guild of Air Pilots and Air Navigators
GATCO	Guild of Air Traffic Control Officers
GNSS	Global Navigation Satellite Service
GPS	Global Positioning System
HCGB	Helicopter Club of Great Britain
HAL	Highlands and Islands Airports Ltd

Acronym	Meaning
HQ DAAvn	Headquarters Director Army Aviation
IAIP	Integrated Aeronautical Information Package
IFP	Instrument Flight Procedure
IFR	Instrument Flight Rules
IGAFG	Inverness General Aviation Focus Group
IMC	Instrument Meteorological Conditions
LAA	Light Aircraft Association
LEA	London Executive Aviation
LoA	Letter of Agreement
MAA	Military Aviation Authority
MP	Member of Parliament
MSP	Member of the Scottish Parliament
MOD	Ministry of Defence
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
NPC	NATS Prestwick Centre
OS	Ordnance Survey
PAR	Preferred Arrival Route
PBN	Performance Based Navigation

Acronym	Meaning
PDR	Preferred Departure Route
PSR	Primary Surveillance Radar
RAF	Royal Air Force
RMZ	Radio Mandatory Zone
RTF	Radiotelephony
SARG	CAA Safety and Airspace Regulation Group
SERA	Standard European Rules of the Air
SRG	Safety Regulation Group (part of the CAA)
SSR	Secondary Surveillance Radar
STAR	Standard Terminal Arrival
SVFR	Special Visual Flight Rules
TMA	Terminal Control Area
TMZ	Transponder (SSR) Mandatory Zone
UKAB	UK Airprox Board
UKFSC	UK Flight Safety Committee
VFR	Visual Flight Rules
VGS	Volunteer Glider Squadron
VHF	Very High Frequency
VMC	Visual Meteorological Conditions
VOR	VHF Omni Directional Radio Range; a type of short-range radio navigation system for aircraft

2 Introduction

This document is a Report of the second stage of consultation carried out by Highlands and Islands Airports (HIAL) between 5th August and 6th November 2016, on the proposed amendment 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

Inverness Airport supports a vital and effective national and international flight network to both the local community and wider Highlands area. Highlands and Islands Airports Limited (HIAL), owner and operator of Inverness Airport, has identified the need for changes to the current arrangements and procedures in the immediate airspace surrounding Inverness Airport. Advances in Air Traffic Management (ATM), airliner navigation and routing procedures plus General Aviation (GA) navigation are driving these amendments. The purpose of the proposal is to ensure that environmental and economic benefits are achieved through efficient use of surrounding airspace and procedures, providing protection on critical stages of flight following departure and prior to arrival for Instrument Flight Rules (IFR) commercial air transport flights and arrival for Visual Flight Rules (VFR) flights.

The Inverness Airport airspace change is hereafter referred to as ‘the proposal’.

HIAL is developing the Airspace Change Proposal (ACP) through the methodology directed by the Civil Aviation Publication (CAP) 725 Civil Aviation Authority (CAA) Guidance on the Application of the Airspace Change Process [Reference 1]. This process requires consultation on the amendment with all affected stakeholders. HIAL completed a first stage of consultation on an initial design of Controlled Airspace (CAS) for Inverness Airport in April 2015. Valuable and well-informed feedback was received from all those consulted and analysis of the responses highlighted some common themes. These concerns have led to a significant change in the design, in geographic extent, volume and type, of the proposal for CAS surrounding Inverness Airport in order to increase the flexibility for GA and MOD VFR operations within and around this CAS.

This document is a Report on the second stage of consultation carried out by HIAL between 5th August and 6th November 2016 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 ACP submission to the CAA. The ACP will detail the case for the proposed amendment to the current arrangements and procedures in the immediate airspace surrounding Inverness Airport.

2.2 Subject of the Consultation

The previous consultation document (HIAL Consultation Document: Proposal for the Introduction of Controlled Airspace and Optimisation of Instrument Flight Procedures at Inverness Airport dated 19th September 2014 [Reference 2]), on the HIAL website¹, provided the full background to the need for a change to the airspace classification and the new procedures that HIAL intends to introduce at Inverness Airport. This document contains information from which stakeholders can gain an understanding of the changes made to the proposed airspace design, and why, and how the new design will affect flight operations.

The changes include:

- Reduction in the lateral extent of the Class D airspace;
- Reduction in the vertical limit of the Class D Control Zone (CTR), previously from surface to Flight Level (FL)95, now surface to 2,000 ft above mean sea level (amsl);
- Reduction in the number of Class D Control Areas (CTA) from seven to six;
- Reduction in the common ceiling altitude of the Class D CTAs from FL95 to 5,500 ft amsl;
- Increase in the number of Class E+ Transponder Mandatory Zone (TMZ) CTAs from two to four, to be contiguous with the Class E + TMZ airways above the Airport forming part of the UK en-route airways structure.

The previously consulted airspace design is presented in Annex A3 to this document.

HIAL, as the sponsor of the proposal, 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 that 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 101 consultees, comprising:

- 39 members of Aviation "National Organisations" (CAA National Air Traffic Advisory Committee (NATMAC list²));
- 18 Airport Users;

¹ www.hial.co.uk/inverness-airport/jet-centre/nats-nautical-information-service/

² Includes organisations represented by more than one NATMAC member

- 10 Local Aerodromes/Aviation Consultees;
- 4 Members of the UK Parliament (MP);
- 11 Members of the Scottish Parliament (MSP);
- 13 Council Wards and Local Authorities; and
- 6 Local/National Environmental Organisations.

Of these, 6 emails were returned as undelivered. Therefore, the total number of consultees that received the consultation email was 95.

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.

2.5 Document Structure

This document contains 6 main sections and 4 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.
- Annex A1 details the background to this consultation and the consultation methodology;
- Annex A2 lists the consultees; and
- Annex A3 illustrates the previously consulted airspace design (2014 Proposal).

3 Consultation Statistics

The HIAL Airspace Change consultation invitations were circulated to a total of 101 stakeholder consultee organisations or individuals, of which 6 were returned as undelivered. The Second Phase Consultation Document was also posted on the HIAL/Inverness website. A total of 105 responses to this consultation were received, of which 88 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 second phase consultation invitations were circulated to a total of 101³ stakeholder consultee organisations or individuals detailed in Annex A2.

As stated in Section 2.3, 6 consultation emails were returned as undelivered, making the total number of consultees equal to 95.

The consultation document was distributed via a dedicated link on the HIAL website⁴ 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 that may be affected by the proposed changes. National bodies such as the Light Aircraft Association (LAA), British Airline Pilots Association (BALPA), and the 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 include environmental and heritage organisations, local planning authorities and the public. The consultee groups are detailed in Figure 1 below.

³ It should be noted that NATMAC comprises a total of 39 organisations; this analysis reflects the views of the organisations as a whole and not of the individuals representing them.

⁴ <http://www.hial.co.uk/inverness-airport/jet-centre/nats-nautical-information-service/>