

Safety and Airspace Regulation Group		
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Title of Airspace Change Proposal	Leeds Bradford Airport (LBA) (ACP-2015-10)
Change Sponsor	LBA (Osprey CSL as project management)
SARG Project Leader	
Case Study commencement date	08/04/2019
Case Study report as at	23/04/2019
File Reference	ACP-2010-15

Instructions
In providing a response for each question, please ensure that the 'Status' column is completed using the following options: • Yes • No • Partially • N/A To aid the DAP Project Leader's efficient Project Management it may be useful that each question is also highlighted accordingly to illustrate what is resolved Green not resolved Amber or not compliant Red as part of the DAP Project Leader's efficient project management.

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1.	Consultation Process	Status
1.1	Is the following information complete and satisfactory?	
	• A copy of the original proposal upon which consultation was conducted.	YES
	• A copy of all correspondence sent by the sponsor to consultees during consultation.	YES
	• A copy of all correspondence received by the sponsor from consultees during consultation.	YES
	• A referenced tabular summary record of consultation actions.	YES
	• Details of and reasons for any changes to the original proposal as a result of the consultation.	YES
	• Details of further consultation conducted on any revised proposal.	YES

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1.2	Were reasonable steps taken to ensure all necessary consultees actually received the information e.g. postal/e-mail/meeting fora?	YES
	The sponsor undertook a comprehensive set of briefings in anticipation of the consultation through the airport Consultation Committee and other fora. Whilst some stakeholders questioned the level of publicity, on balance, the sponsor achieved an acceptable level of publicity.	
1.3	What % of all operational consultees replied? (Include actual numbers).	16(3.9%)
	There were no responses to the consultation from airport operators, although that can be attributed to the relatively benign nature of the proposal for those operators. MoD responses were channelled through DAATM via NATMAC. Of the targeted stakeholders, only 2 of 19 identified Aerodromes, Clubs and Flying Clubs sent responses. Of interest, a further 10 aerodromes, Flying Schools and Flying Clubs submitted responses; that calls into question the stakeholder identification process. More significantly, other airspace users challenged the proposal on the grounds of justification, proportionality and access with GA and NATMAC organisations forming the body of response endorsed by local clubs through the Regional Airspace Users Working Group. A large number of responses were also received by private pilots (252) objecting to the proposal.	
1.4	What % of all environmental consultees replied? (Include actual numbers).	4 (1.29%)
	Of those environmental stakeholders identified, the response was extremely low. That said, a number of affected community representatives engaged strongly on behalf of their local populace and continue to do so. Only 1 MP out of 30 MPs consulted responded to the consultation. Three non-aviation bodies supported the proposal, on economic grounds whilst other responses voiced concerns over environmental impact borne from the technical nature of the information presented in the consultation document. A further 144 responses from private individuals/interested bodies were received, with the majority objecting to the proposal on environmental grounds.	
1.5	Were reasonable steps taken to ensure as much substantive feedback was obtained from the consultees e.g. through follow-up letters/phone calls?	NO
	The sponsor maintained an ongoing dialogue with the stakeholders concerned. In certain cases, however, the response time for feedback was inadequate leading to antagonism from stakeholders which slowed the progress of the proposal. Whilst the sponsor subsequently extended the response period, this occurred following pressure from the CAA.	
1.6	Have all objections to the change proposal been resolved (or sufficiently mitigated)?	NO
	The objections to the proposal fell into a number of categories:	

- **Justification.** The sponsor explained that change was required due the current situation being unsustainable, that future growth predictions required change, and that DVOR rationalisation/PBN/FASI(N) made change inevitable. Whilst the latter justifications were entirely valid, the issues surrounding current situation/future expansion were not adequately justified and the subsequent responses to stakeholders were ambiguous and indicated a reactive approach by the sponsor. The publication of safety-related incidents did not clearly establish a causal link to airspace structure.
- **Proportionality.** The sponsor chose to justify the final airspace design on the containment requirements for the IFP designs submitted, most notably for the CTAs proposed for the north and east of the area. These CTAs were considered most contentious by GA stakeholders, as they allegedly introduced barriers to operations for non-radio/non-transponder equipped. That effectively precluded cross-country gliding operations from a number of sites. The sponsor's suggested mitigation, that access was available for those who participated in ATC, was insufficient given that those GA organisations raising the objection clearly stated that the impact would be on those unable to participate in ATC. Whilst the sponsor also looked to mitigate the issue through Letters of Agreement, the issue of cross-country gliding/paragliding/hang-gliding has not been adequately addressed. It is significant that the sponsor did not appear to reassess IFP designs in order to further mitigate impact or attempt to reduce the volume of airspace requested, nor at this time have those original designs been formally validated. Consequently, if those designs fail to validate, for whatever reason, it is likely that further consultation would be required, as redesign may materially change aircraft tracks over the ground.
- **Complexity.** A large number of respondents to the consultation objected to the complexity of the airspace design and the number of different CTA/CTRs proposed. That said, the complexity occurred due to the interface with the en-route airspace above the proposed airspace rather than below; consequently, this was adequately explained by the sponsor.

In addition, environmental stakeholders commented on the technical complexity of the consultation material. It is notable that the consultation material contains a large number of technical IAP plates/environmental impact diagrams that have very little explanation for those without detailed subject knowledge. The inclusion of an existing turbo-prop aircraft route in the original consultation document, but then not subject to the proposal, further exacerbated the issue and, in part, lead to the addendum consultation.