

Safety and Airspace Regulation Group

Title of Airspace Change Proposal	Biggin Hill RNAV Procedures
Change Sponsor	Biggin Hill Airport Limited
SARG Project Leader	██████████
Case Study commencement date	30/07/2020
Case Study report as at	11/11/2020
File Reference	ACP-2013-08

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 SARG 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 SARG Project Leader's efficient project management.

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1.	Consultation Process	Status
1.1	<p>Is the following information complete and satisfactory?</p> <ul style="list-style-type: none"> • A copy of the original proposal upon which consultation was conducted. • A copy of all correspondence sent by the sponsor to consultees during consultation. • A copy of all correspondence received by the sponsor from consultees during consultation. • A referenced tabular summary record of consultation actions. • Details of and reasons for any changes to the original proposal as a result of the consultation. • Details of further consultation conducted on any revised proposal. 	<p align="center">YES</p> <p align="center">PARTIALLY</p> <p align="center">YES</p> <p align="center">PARTIALLY</p> <p align="center">YES</p> <p align="center">YES</p>

1.2 Were reasonable steps taken to ensure stakeholders actually received the information e.g. postal/e-mail/meeting fora?

YES

Having been advised by the CAA that there was no process requirement to re-consult with those communities where there had been no modification to the proposed (Instrument Approach Procedure (IAP), the change sponsor developed a list of 122 targeted stakeholder organisations (70 aviation and 52 non-aviation) for a supplementary consultation. Stakeholders were contacted by email/post to confirm the launch of the supplementary consultation, but copies of this correspondence were not provided and therefore it was not possible to review and comment on its contents. The primary means of accessing the consultation document was through the airport’s website, but the change sponsor confirmed their intention to make hard copies available on request. To promote the consultation to a wider audience, the change sponsor stated that local media were informed and that related news items were published. However, it was not possible to validate this as no relevant supporting evidence was provided.

The change sponsor has provided a ‘consultation consultee spreadsheet’ which suggests that read receipts were used and that hastening telephone calls were used to encourage/ elicit responses, indicating that they were proactive in terms of tracking feedback from the targeted stakeholders. An acceptable response rate of 15% (18 responses from 122 targeted stakeholders) was achieved and this, alongside the additional responses from 79 non-targeted stakeholders, indicates that reasonable steps were taken by the change sponsor to distribute/promulgate the consultation.

1.3 What % of the targeted aviation stakeholders replied? (Include actual numbers).

13% (9/70)

During this assessment, it was noted that there were discrepancies when cross-checking the raw data consultation responses, consultation consultee spreadsheet (which appears incomplete) and the consultation response document. The following numbers are based on a comprehensive review of the raw data consultation responses provided and therefore it should be noted that they differ from those presented in the change sponsor’s consultation response document.

The change sponsor targeted 70 aviation stakeholders and 9 responded; these numbers can be grouped and broken down as follows:

Aviation Stakeholder Group	Targeted	Responded
Airport Users	25	0
Other Affected Aviation	12	3
NATMAC – Civil	28	6
NATMAC – Military	5	0
TOTALS	70	9

The 9 aviation consultee responses can be further broken down as follows:

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- 2 (22%) supported the proposal. Whilst both consultees offered general support for the implementation of PBN procedures, they highlighted that there are were several issues to be addressed/considered before the proposed IAP could be implemented.
- 1 (11%) had no objection to the proposal. The consultee clearly stated that they had “no issues with the 03 runway plan” but the change sponsor had categorised this as a response which supported the proposed IAP.
- 5 (56%) objected to the proposal

The status for the 1-remaining consultee is marked as ‘pending’ on the change sponsor’s consultation consultee spreadsheet. This consultee responded on the 19th March 2017, seeking clarification on several points. Whilst the change sponsor provided a comprehensive response, they did not do so until the 15th May 2017, 1-month after the consultation had closed. Without the required clarification, it is assumed that this consultee was unable to finalise their consultation response, hence why it has been marked as ‘pending’.

1.4 What % of the targeted non-aviation stakeholders replied? (Include actual numbers).

**17%
(9/52)**

During this assessment, it was noted that there were discrepancies when cross-checking the raw data consultation responses, consultation consultee spreadsheet (which appears incomplete) and the consultation response document. The following numbers are based on a comprehensive review of the raw data consultation responses provided and therefore it should be noted that they differ from those presented in the change sponsor’s consultation response document.

The change sponsor targeted 52 non-aviation stakeholders and 9 responded; these numbers can be grouped and broken down as follows:

Non-Aviation Stakeholder Group	Targeted	Responded
Airport Consultative Committee	1*	0
Members of Parliament	13	1
County/City/District Councils	10	3
Parish Councils (or equivalent)	22	4
Other Organisations/Individuals	6	1
TOTALS	52	9

* 15 stakeholders representing different areas of interest sit on the Airport Consultative Committee.

The 9 non-aviation consultee responses can be further broken down as follows:

- 2 (22%) had no objection to the proposal. One consultee clearly stated that they had “no objection to the changes proposed” but the change sponsor had categorised this as a response which supported the proposed IAP.
- 4 (44%) objected to the proposal
- 3 (34%) made no comment about the proposal. Although categorised as a ‘no comment’ response, one consultee raised several issues which needed to be fully considered before the proposed IAP was introduced; these were addressed/acknowledged in the consultation response document and are summarised in Section 1.6 below.

The consultation consultee spreadsheet suggests that a late response was received from an ‘other organisation/individual’ consultee on the 18th May 2017. It confirms that the contents would not be included within their analysis, but that it would be included within the formal airspace change proposal submission, but no further evidence was located as part of this assessment.

In addition to the feedback received from the targeted aviation and non-aviation consultees detailed above, the change sponsor also received feedback from 79 consultees responding in an individual or representative capacity. These responses can be broken down as follows:

- 8 (10%) supported the proposal
- 1 (1%) had no objection to the proposal
- 69 (88%) objected to the proposal

The status for the 1-remaining consultees is marked as ‘pending’ on the change sponsor’s consultation consultee spreadsheet. This consultee responded on the 8th March 2017 requesting clarification on the anticipated impact of the proposed IAP for a particular community. The consultation consultee spreadsheet suggests that the change sponsor considered responding via the Chair of the relevant resident’s association, but it was not possible to determine whether the required follow up action was taken from reviewing the evidence provided.

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?

PARTIALLY

The consultation was formally launched on the 27th February 2017 with the targeted stakeholders being contacted primarily by email, with hard-copy correspondence being distributed to those where no-known email address existed. The invitation to participate in the consultation has not been provided and therefore it was not possible to review and comment on its contents. Whilst the primary means of accessing the consultation document was through the airport’s website, hard copies were made available on request. To promote the consultation to a wider audience, the change sponsor stated that local media were informed and that related news items were published, but it was not possible to validate this as no related supporting evidence was provided.

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	<p>The change sponsor was proactive in terms of monitoring the response rate from the targeted stakeholders, using hastening telephone calls as required. However, there are some examples (see Section 1.3 and 1.4 above) of 'pending' consultation responses and it was not possible to determine whether the required follow up action was taken by the change sponsor.</p> <p>Stakeholders were given a period of 6-weeks to review the consultation document and respond accordingly. Whilst this is less than the widely recognised standard of 12-weeks, the CAA had previously advised the change sponsor that this would be 'adequate' given the scope and scale of this supplementary consultation.</p>	
<p>1.6</p>	<p>Have all objections to the change proposal been resolved (or sufficiently mitigated)?</p> <p>The raw data consultation responses have been reviewed and whilst there are some examples where specific points of feedback have not been acknowledged/addressed by the change sponsor, I am satisfied that the list of 'themes and issues of concern' contained within the consultation response document is a fair and adequate representation of consultee feedback. The change sponsor has included their response to each within the consultation response document and in some cases, they felt it necessary to respond directly to the consultee (examples of outgoing correspondence have been provided and reviewed as part of this assessment).</p> <p>The following summarises the 'themes and issues of concern' specifically relevant to those consultees which objected to the proposed IAP and the change sponsors response to them:</p> <p>Interaction with Heathrow SIDs via DET</p> <ul style="list-style-type: none"> • Heathrow airport confirmed that they were unable to support the proposal until after they had completed an operational trial, designed to test the operational and environmental impact of changes to the Detling (DET) SID which would include procedural separation from the change sponsors proposed IAP. The change sponsor confirmed that they were reluctant to defer seeking CAA approval and implementation of the proposed IAP. They confirmed that they would maintain dialogue and pursue an interim solution that would facilitate the introduction of the proposed IAP whilst awaiting the permanent procedural solution. The change sponsor has stated that following the permanent implementation of a steeper climb gradient on the DET SID, this issue has been resolved and that Heathrow have confirmed that they are content with the proposed IAP. However, the proposed IAP has not yet been assessed and approved by a CAA IFP Regulator. <p>Redhill Aerodrome</p>	<p align="center">PARTIALLY</p>

- Redhill aerodrome expressed concerns about the potential for conflict between their operations and the proposed IAP. They suggested that there was nothing in the consultation document which explained how this would be mitigated. They also stated that no discussions had taken place with Redhill ATC regarding potential procedures which could be incorporated into a Letter of Agreement (LOA). They also sought clarification on H24 operations taking place outside of ATC hours and the consideration given to the helicopter operators that have specific company IFR let-down procedures for Redhill aerodrome. In response, the change sponsor confirmed that it was developing a draft LOA to facilitate the provision of pertinent traffic information between Biggin Hill and Redhill and a copy was included as supporting evidence within the formal airspace change proposal. A related 'condition' has been captured in Section 2.2 below.

Mix of VFR and IFR flights in a very narrow corridor

- Consultees suggested that the consultation document did not contain data concerning the level of VFR traffic utilising the airspace within which the proposed IAP was located and that there was no risk assessment regarding the IFR/VFR traffic mix. Having discussed this matter with the CAA, the change sponsor explained that there was no recognised or meaningful methodology for undertaking a risk assessment in Class G airspace. However, they confirmed that they would liaise with FASVIG to discuss the results of any risk assessment completed using the TRAX International modelling tool.
- Concerns were expressed about the proposed IAP being unsafe, with many consultees highlighting the potential for a mid-air collision between VFR and IFR flights operating in a narrow corridor of Class G airspace. The change sponsor cited numerous examples when explaining that the proposal to introduce an IAP in Class G airspace is not unique. They also explained that all operations in Class G airspace rely on good airmanship, inferring that so long as this is observed, both IFR and VFR flights will be aware of each other's potential activity.
- Consultees noted the potential for conflict between Redhill traffic utilising the notified Visual Reporting Points (VRPs) and traffic following the proposed IAP. The change sponsor advised that an LOA and the use of an Aerodrome Traffic Monitor would ensure that meaningful traffic information was passed between the two units and to aircraft operating in the area of concern.
- Consultees pointed out that some of the aircraft operating within Class G may be communicating with numerous ATC agencies or indeed none at all. The change sponsor advised that an LOA will be developed with the Farnborough Lower Airspace Radar Service (LARS) to enhance the passing of meaningful traffic information between the ATC units at Farnborough and Biggin Hill and to aircraft under the jurisdiction of both units. They confirmed that aircraft following the proposed IAP would be carrying the Biggin Conspicuity Code and therefore identifiable to Farnborough LARS. Evidence has been provided to confirm that the change sponsor has discussed the matter with Farnborough

LARS and that both parties have agreed to discuss the matter further, if the proposed IAP is approved by the CAA. A related 'condition' has been captured in Section 2.2 below.

- Some consultees questioned what options there would be to take avoiding action, highlighting the potential to enter/infringe a busy portion of controlled airspace (CAS). The change sponsor does not acknowledge/address this point in their consultation response document.
- The change sponsor also failed to acknowledge/address a suggestion that the 'squeeze' on the narrow VFR corridor could be alleviated by raising the base of a small section of the Gatwick Control Area (CTA), that which is located to the north of the CTR.
- Consultees also suggested that the current visual circling approach seemed a safer option, but this was not acknowledged/addressed by the change sponsor.

Within Part B of their formal airspace change proposal, the change sponsor has stated that the results of the HAZID analysis along with the use of good airmanship protocols, have led them to conclude that the proposed procedure remains "*viable and tolerably safe for Class G airspace operations*" (see Para 5.6.8).

IAP should have restricted availability

- A counter proposal was made that the proposed IAP be published with a specification that it was only usable when the cloud ceiling was below the height of the proposed IAP at the ATZ boundary. The change sponsor stated that this was an unviable suggestion as it would render the proposed IAP unavailable to the type of aircraft routinely operating in to Biggin Hill.

Potential increase in gliding activity at Kenley

- Concern was expressed that the change sponsor had not fully considered the impact of the proposed IAP on operations at Kenley aerodrome, particularly given the likelihood of increased operations. The change sponsor highlighted that Kenley aerodrome had not responded to either consultation, and explained that they were unaware of a planned increase in their activity. They stated that it was their intention to meet with the military and civil gliding operators at Kenley aerodrome to determine whether any formal arrangements (e.g. LOA) were required. The change sponsor has provided a document summarising their communications with Kenley; it confirms that as of 26th April 2018, attempts to agree a Memorandum of Understanding (MOU) had been unsuccessful, but that Kenley would be prepared to discuss an MOU further should the proposed IAP be approved. A related 'condition' has been captured in Section 2.2 below.

Green Dragon Flying Club, Woldingham

- Disappointment was expressed that the Green Dragon Flying Club, a local aviation stakeholder had not been targeted and despite two approaches that were made to the change sponsor to request a meeting to discuss the proposed IAP, no such meeting was facilitated. The change sponsor explained that the club is located approximately 1-nautical mile away from the nominal flight path of the proposed IAP and clear of the Runway 03 final approach path. Whilst no formal arrangements exist between Biggin Hill and the club, the change sponsor confirmed that they would approach the Chief Flying Instructor to determine whether an LOA was required. No evidence of follow-up discussions has been submitted, so it's not possible to comment further on this matter.

Woldingham (including the Ridge)

- Whilst consultees noted that the modified IAP benefited certain communities that were affected by the original design, they suggested that it would be detrimental to Woldingham and Caterham, highlighting that high ground meant that aircraft would be lower when passing overhead and therefore the noise impact would be greater. Consultees also pointed out that the proposed IAP failed to adequately address one of the principal suggestions for an alternative flight path from the original consultation feedback, in that it was not completely aligned with the M25. Whilst the change sponsor acknowledged that the location of the nominal flight path over the higher ground of the Ridge was not ideal, they cited regulatory requirements and explained that it was necessary to ensure that the 'Primary Area' of the proposed IAP did not overlap the boundary of the Gatwick CTA. They also confirmed that the procedure designers had been instructed to review this aspect to determine whether the nominal flight path could be moved further south without compromising London Gatwick's operation. Part B of the formal airspace change proposal submission confirms that it was subsequently found possible to adjust the alignment of the IAP by approximately 240 metres to the south, thereby moving it away from the high ground, and to raise the altitude of the Final Approach Fix (FAF) to 1,800 feet. Whilst this modification meant that the northern extremity of Godstone would be overflown, the change sponsor determined that this was a more appropriate solution (see Para 5.4.11).
- A single consultee suggested that the change sponsor had been 'selective' with regards to its choice of aircraft data in the consultation document. They suggested that there had been no mention of the heavier and noisier aircraft (e.g. the Boeing 757, Airbus A320, ATR72 and Dash86) and therefore questioned the noise data that had been presented. The change sponsor confirmed that none of the aircraft types referenced had operated at Biggin Hill during 2016, the timeframe covered by the noise assessments presented in the consultation document. The consultation document also stated that the Cessna 560XL and Learjet35 aircraft types on which the noise assessment was based are "*recognised as the noisiest and most common types likely to operate to LBHA in the early morning period*".

- Noting that the proposed IAP was a Non-Precision (LNAV) Instrument Approach Procedure, a single consultee suggested that the change sponsor had failed to produce a design which delivered against their “*highly desirable*” objective of implementing an Approach with Vertical Guidance (APV) IAP. In their formal airspace change proposal, the change sponsor explained that this change was unavoidable due to the need to consider and overcome concerns raised regarding the interactions of aircraft operating on the proposed IAP alongside those of London Gatwick airport. They also noted that the proposed IAP was considered acceptable for an aerodrome located outside of controlled airspace.

Bromley & Orpington

- Consultees expressed concern about the potential impact on residents of Bromley and the Crofton Ward of Orpington, noting that the Missed Approach Point (MAP) was located over Princess Royal University Hospital. Whilst the change sponsor acknowledged this to be the case, they explained that the MAP, an integral and mandatory part of an IAP design, is seldom used in practice by those aircraft unable to complete a landing in the unlikely event that the runway is blocked, or the weather deteriorates below the pilots landing minima. They re-iterated that Runway 03 was only required for approximately 30% of the time and that the actual usage of the proposed IAP was likely to be low. They also cited the need to meet Instrument Flight Procedure (IFP) design criteria in terms of the location of the MAP.

Reigate & Banstead

- Reigate & Banstead Borough Council registered concerns around the rigour of the environmental assessment with respect to CAP 725 methodology. The change sponsor suggested that they had fully complied with CAP 725 requirements and referenced the quantitative analysis completed by Bickerdike Allen Partners, specialist noise consultants and the CAA’s Environmental Research and Consultancy Department. They also explained that the CAA would ultimately determine whether the process requirements had been met when they review and analyse their formal airspace change proposal submission.
- With regards to concerns expressed about inadequate forecasting of future movements, the change sponsor explained that this had been addressed in the original consultation document, which highlighted that it was difficult to specify predicted growth as the Corporate and Business aviation market is a highly competitive and challenging one. They explained that the scope of the supplementary consultation was limited to the modifications made to the proposed IAP and not about the basic principle of introducing an IAP.
- Referencing Tables 7 and 8 in the consultation document, the Council suggested that the proposed IAP would increase fuel burn by 30-50% and questioned the claim in the original consultation document that introduction of an

IAP to Runway 03 would “*prove neutral in terms of overall fuel burn*”. The change sponsor explained that the proposed IAP would alleviate the fuel burn and emissions, together with the operating costs and commercial inconvenience, of airport users having to divert to alternative aerodromes in periods of bad weather.

- The Council sought clarification on the level of monitoring that would be put in place, both pre and post implementation if the proposed IAP was approved and implemented. They also queried what would happen should it be found that the new route causes significant noise problems for residents. The change sponsor explained that the CAA would specify the monitoring requirements as part of their decision-making process and that the Post Implementation Review (PIR) would help the CAA determine whether the original objectives had been achieved and if not, what further action was required. Section 2.3 below places a requirement on the change sponsor to collate PIR-related information, if the proposed IAP is approved and implemented.
- Highlighting that residents in Hooley and Merstham would be newly affected if the proposed IAP was approved and implemented, the Council asked whether the change sponsor intended to make compensation payments. The change sponsor confirmed that their position had not changed from that set out in the original consultation report and advised that the implementation of the proposed IAP would not result in “*significantly increased overflight*”.

About the Consultation

- Consultees disagreed with the targeted stakeholder approach and suggested that the list of stakeholders was missing some relevant Parish Councils and local associations (e.g. Woldingham Association Limited). The change sponsor referenced related discussions with the CAA and confirmed that their recommendations in terms of stakeholder coverage had been adopted.
- They also felt that the consultation document made it seem as though a decision had already been made and did not believe that all the alternative options to resolve previous design issues had been explored. The change sponsor explained that the implementation of the proposed IAP was not a foregone conclusion, highlighting that it required the acceptance and approval from the CAA before it could be implemented.
- The quick timescales were questioned as was the shortened consultation period. The change sponsor referenced related discussions with the CAA and confirmed that shorter timescales are standard recommendations for supplementary consultations. In terms of overall timescales, the change sponsor explained that they have an urgent operational requirement to implement an IAP to Runway 03.

Although not raised by consultees which objected to the proposal, the following points of feedback are worth noting:

Other outstanding aviation aspects

A comprehensive response was submitted by NATS, within which several issues and considerations were raised as needing to be addressed before the planned implementation date. The following are worth noting:

- They suggested the addition of 'direct routeing' waypoints to allow more efficient use of airspace. The change sponsor agreed to investigate this with the procedure designer.
- Concerned about the increased potential for inadvertent penetration of CAS, they sought assurance on the lateral and vertical accuracy of the proposed LNAV only procedure. The change sponsor stated that in their view, the vertical profile of the proposed IAP was adequately separated from CAS as it was at least 300 feet below any flight operating within it. They also highlighted that the proposed IAP was located outside of the lateral boundary of Gatwick's CTA.
- They stated that the LOA between Biggin Hill and Thames Radar needed to be finalised and suggested that new or revised Air Traffic Service (ATS) coordination procedures between Biggin Hill and NATS Farnborough for ATS provision outside of controlled airspace needed to be discussed. The change sponsor advised that the LOA between Biggin Hill and Thames Radar was being developed and would be agreed before the formal airspace change proposal is submitted to the CAA. They also confirmed that a review of inter-unit coordination procedures with NATS Farnborough was in progress and that if required, a related LOA would be developed, agreed and submitted to the CAA. See section 2.2 for related 'conditions'.

Consider an LNAV+V procedure

- Consultees suggested that the proposed IAP should be designated 'LNAV+V' so that it provided an advisory glidepath, which has the potential to improve safety and reduce the noise footprint. The change sponsor confirmed that LNAV+V is not a recognised term in PANS-OPS procedure design nomenclature or application and confirmed that the design, designation and operating minima for the proposed IAP is LNAV in accordance with PANS-OPS criteria.

Other environmental comments

- A single consultee queried whether respite measures had been considered and asked whether trials would be undertaken to understand the actual impact of the proposed IAP. The change sponsor explained that it was their expectation that no more than 10 arriving aircraft in a peak hour would utilise the proposed IAP and suggested

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therefore that 'natural respite' would occur. They advised that the design, flyability and ground track of the proposed IAP would be validated in a simulator evaluation.

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2.	Recommendations / Conditions / PIR Data Requirements	
2.1	<p>Are there any Recommendations which the change sponsor <u>should try</u> to address either before or after implementation (if approved)? If yes, please list them below.</p>	N/A
	N/A	
2.2	<p>Are there any Condition(s) which the change sponsor <u>must fulfil</u> either before or after implementation (if approved)? If yes, please list them below.</p>	YES
	<p>If the proposed IAP is approved, the change sponsor must ensure that the following documents are finalised and agreed (as required) with the relevant stakeholders prior to implementation:</p> <ul style="list-style-type: none"> • LOA between Biggin Hill ATC and Redhill ATC • LOA between Biggin Hill ATC and Farnborough LARS • LOA between Biggin Hill and NATS Swanwick • LOA between NATS Swanwick and NATS Farnborough • MOU between Biggin Hill ATC and Surrey Hills Gliding Club (Kenley Gliding Site) • LOA/MOU between Biggin Hill and Green Dragon Flying Club 	
2.3	<p>Are there any specific requirements in terms of the data to be collected by the change sponsor for the Post Implementation Review (if approved)? If yes, please list them below.</p>	YES
	<p>The change sponsor is required to collate related stakeholder observations (enquiry/complaint data) and present it to the CAA. Any location/area from where more than 10 individuals have made enquiries/complaints must be plotted on separate maps displaying a representative sample of:</p> <ul style="list-style-type: none"> • aircraft track data plots; and • traffic density plots <p>The plots should include a typical days-worth of movements from the last month of each standard calendar quarter (March, June, September, December) from each of the years directly preceding and following implementation of the airspace change proposal.</p>	

Conclusions	Yes/No
Does the consultation meet the CAA's regulatory requirements, the Government's guidance principles for consultation and the Secretary of State's Air Navigation Guidance?	YES
<p>The fundamental principles of effective consultation are targeting the right audience, communicating in a way that suits them, and giving them the tools to make informative, valuable contributions to the proposal's development. I am satisfied that these principles have been applied by the change sponsor before, during and after the consultation. I am also satisfied that the change sponsor has conducted this consultation in accordance with the requirements of CAP 725, that they have demonstrated the Government's consultation principles and that the consultation has:</p> <ul style="list-style-type: none">• Taken place when the proposal was at a formative stage.<ul style="list-style-type: none">○ Consultees did suggest that the consultation document gave the impression that a decision had already been made and whilst the scope was limited to the modifications made to the proposed IAP in response to the feedback received during the original consultation, further modifications were made in-light of feedback received during this supplementary consultation. The change sponsor has therefore demonstrated that they were prepared to make alterations in response to the feedback received from consultees.• Presented the consultation material clearly and outlined the potential impacts that needed to be considered.<ul style="list-style-type: none">○ Several concerns were raised by consultees which suggested that they felt that there was insufficient information contained within the consultation document and consequently that it failed to make the likely impact(s) clear. However, it is my view that the change sponsor had provided various sources of information/data and as much as they possibly could in the circumstances to allow stakeholders to determine the likely impact(s). This view is shared with the Airspace Regulator (Environment) who has confirmed that the change sponsor has met process requirements in terms of presenting the environmental impacts of the proposed IAP in both the original and supplementary consultation documents.• Provided a sufficient timeframe to allow considered responses.<ul style="list-style-type: none">○ Consultees did suggest that the consultation period was too short and whilst it is important to acknowledge that the 6-week consultation period is less than the widely recognised standard of 12-weeks, the CAA had advised the change sponsor that this would be 'adequate' given the scope and scale of this supplementary consultation.	

- **Taken into account the product of the consultation.**

- This is evidenced by the comprehensive list of 'themes and issues of concern' that were identified by the change sponsor, the follow-up discussions with stakeholders, and the subsequent modifications to the proposed IAP prior to its formal submission to the CAA, all of which demonstrate that the change sponsor was prepared to be influenced by the feedback received from consultees.

General Summary

The scope of this consultation was limited to the modifications made to the proposed IAP following the original consultation. Whilst consultees suggested that there was insufficient information in the consultation document, it was structured in a logical order, with an appropriate amount of context being provided in terms of the principal concerns arising from the original consultation, the change sponsors response to them, the modified design and the related anticipated impacts.

A comprehensive list of 122 (70 aviation and 52 non-aviation) stakeholders were targeted by the change sponsor and an acceptable response rate of 15% (18 responses) was achieved. This, alongside the additional responses from 79 non-targeted stakeholders, indicates that reasonable steps were taken by the change sponsor to distribute/promulgate the consultation to the targeted stakeholders and a wider audience.

It was noted during the assessment that there were discrepancies when cross-checking the raw data consultation responses, consultation consultee spreadsheet (which appears incomplete) and the consultation response document. It was also noted that there were several pieces (6 in total) of correspondence which had been listed as 'pending' and in some cases, it was not possible to determine whether the required follow up action was taken from reviewing the submitted evidence. However, I am satisfied that the change sponsor has fairly and adequately identified several 'themes and issues of concern' from the feedback received and for the most part, that these have been sufficiently acknowledged and addressed in their consultation response document. In light of feedback received, further modifications were made and the change sponsor has continued to engage with relevant aviation and non-aviation stakeholders since the end of this supplementary consultation.

Having reviewed all the relevant material, it is my conclusion that the change sponsor completed a meaningful supplementary consultation. Whilst there were elements that could have been done better (e.g. categorisation of responses, the tracking responses and related follow-up actions), it does meet the required regulatory standards and therefore it should be approved.





Ongoing Engagement

It is worth noting that the change sponsor has continued to engage with relevant aviation and non-aviation stakeholder since the submission of their formal airspace change proposal in May 2017. This is summarised in a report dated 1st July 2020 which:

- details the results of the original and supplementary consultations

- explains the minor modifications made post submission of the formal airspace change proposal to reduce the number of communities affected; and
- sets out why further amendments to the proposed IAP are not possible (e.g. constraints of surrounding airspace, alignment of the runway and IFP design criteria).

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Consultation Assessment Sign-off/ Approvals	Name	Signature	Date
Consultation Assessment completed by:	 Airspace Regulator (Engagement & Consultation)		11/11/2020
Consultation Assessment approved by:	 Mgr AR		19/11/2020
Mgr AR Comments: As well as the two consultation documents, also read 'LBHA Runway 03 RNAV ACP Woldingham Parish Council – Update'.			