



Carlisle Lake District Airport Airspace Change Proposal

Consultation Feedback Report

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Executive Summary

Carlisle Lake District Airport would like to extend thanks to all the organisations and individuals who took the time to participate and provide feedback to our Public Consultation that took place between 4th January 2018 and 29th March 2018.

Carlisle Lake District Airport is the Sponsor of a proposed change to the current procedures in the immediate airspace surrounding the airport. The proposed change will allow aircraft to make more successful approaches during poor weather conditions, taking advantage of modern aircraft navigation technology.

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], Carlisle Lake District Airport is required to submit a case to the CAA to justify its proposed Airspace Change, and to undertake consultation with all relevant aviation and non-aviation 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.

This document is a report on the Public Consultation carried out by Carlisle Lake District Airport between 4th January 2018 and 29th March 2018 in accordance with the requirements of CAA CAP 725 [Reference 1]. It includes an analysis of all submissions received throughout the consultation period, provides a summary of consultees that supported the proposed changes and identifies the key issues raised by those consultees that raised objections. It also provides Carlisle Lake District Airport's views in relation to those issues and outlines any post-consultation action taken, or planned to be undertaken, by Carlisle Lake District Airport.

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 procedures in the immediate airspace surrounding Carlisle Lake District Airport.

Subject of the Consultation

The purpose of the Public Consultation was to gather and analyse the views of the various aviation and non-aviation stakeholders concerning a proposal to change the current airspace arrangements in the immediate airspace surrounding Carlisle Lake District Airport. Fundamentally, the consultation enabled Carlisle Lake District Airport to obtain or confirm views and opinions about the potential impact of the proposed airspace change.

Consultee Organisations

The Consultation Document was circulated to a total of 70 organisations and individuals. Of these, no consultation emails were returned as undelivered. The aviation consultees included the Ministry of Defence (MOD), airlines, aircraft operators, adjacent aerodromes, local airspace users, environment and conservation charities 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 included Natural England, and local government at various levels from Parish Councils to District Councils.

Consultation Statistics

A total of 9 responses (12.9 %) were received from the 70 consultees contacted.

In addition, Carlisle Lake District Airport received a total of 30 responses from other individual members of the General Aviation (GA) community, local residents and Parish and County Councils.

Of the total of 39 responses received, 11 consultees supported the proposal; 21 consultees objected to the proposal; and 5 consultees provided a neutral response, whereby the consultee did not object or provided no specific comments on the proposal. Two responses included clarification questions, but the stakeholder did not formally provide a response.

Carlisle Lake District Airport Conclusions

The Public Consultation has produced some moderate opposition from the GA community supported by local and regional gliding clubs and the British Gliding Association (BGA).

The main emphasis of the concerns from the GA community are as follows:

- The positioning of the Runway 06 Hold was considered to be inappropriate as it is overhead a National Park popular with both local walkers and tourists;
- The position of the Runway 06 Hold was also considered to be an area of significant turbulence with the potential for icing that was considered by many to be unsafe for commercial operations;
- The position of the Runway 06 Hold is also a popular area for soaring glider flights and the introduction of a commercial flight route would result in an increased risk of mid-air collision (MAC);

Many of the responses from the GA community stated that they would remove their objection to the proposal if the Runway 06 Hold was moved to be over the Solway Firth.

The Consultation also raised concerns from Stanwix Rural Parish Council. The Council considered the consultation document to be flawed as an instrument of Public Consultation, and the adjustment to approach profiles would lead to enhanced levels of driver distraction and an associated increase in risk of road traffic accidents. Carlisle Lake District Airport hosted a visit on 24th August 2018 for members of Stanwix Rural Parish Council to discuss their concerns.

The Consultation also raised objections from Newcastle International Airport who were principally concerned with the position of the Runway 24 Hold and the potential for conflict with their routes to and from the west. Following the consultation, Carlisle Lake District Airport and Newcastle International Airport have drafted a Letter of Agreement to ensure that both airports can operate safely and efficiently if the proposed procedures are introduced.

Whilst not generating a formal objection, the MOD, through the Defence Airspace and Air Traffic Management (DAATM) organisation, highlighted a need for awareness of the nature of military operations that take place in Danger Area EGD510. Whilst confined to the Danger Area, some of the high energy military manoeuvres may result in triggering the Airborne Collision Avoidance System (ACAS) on commercial aircraft. Additionally, DAATM highlighted that the aircraft operating within EGD510 are not restricted to only operate within

the Danger Area; however once outside they would operate in accordance with the Rules of the Air.

NATS had no objections to the proposal. However, they sought clarity on whether the inbound procedures between NATS and Carlisle Lake District Airport were expected to change and requested clarification before, or as part of, the formal ACP submission. Carlisle Lake District Airport Air Traffic Control personnel are engaging with NATS to ensure that NATS remains informed of procedure developments.

Next Stages

The responses following the Public Consultation have been fully considered by Carlisle Lake District Airport. The responses concerning the proposed location of the Runway 06 Hold were examined carefully. The Airport considered that the hold is unlikely to be used frequently, since the hold in the overhead will be retained, and the number of aircraft likely to be using RNAV procedures will be very light. The issue of turbulence was also considered; the CAA does not consider the area to be 'Mountainous Terrain' which would require specific consideration in terms of ICAO PANS-OPS procedure design. Therefore, the Airport intends to submit the designs as they were presented during consultation.

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.

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1 Glossary

Acronym	Meaning
ACAS	Airborne Collision Avoidance System
ACP	Airspace Change Proposal
AIRAC	Aeronautical Information Regulation And Control
AOA	Airport Operators Association
AONB	Area of Outstanding Natural Beauty
ATC	Air Traffic Control
BALPA	British Airline Pilots' Association
BGA	British Gliding Association
CAA	Civil Aviation Authority
CAP	Civil Aviation Publication
CSC	Cumbria Soaring Club
DAATM	Defence Airspace and Air Traffic Management
DME	Distance Measuring Equipment
GA	General Aviation
GNSS	Global Navigation Satellite System
GPS	Global Positioning System
IAF	Initial Approach Fix
ICAO	International Civil Aviation Organisation
IFP	Instrument Flight Procedure
IFR	Instrument Flight Rules

Acronym	Meaning
LAA	Light Aircraft Association
LoA	Letter of Agreement
MAC	Mid-Air Collision
MOD	Ministry of Defence
NATMAC	National Air Traffic Management Advisory Council
NDB	Non-Directional Beacon
NIA	Newcastle International Airport
PBN	Performance Based Navigation
PinS	Point in Space
RNAV	Area Navigation
RW	Runway
SARG	CAA Safety and Airspace Regulation Group
VFR	Visual Flight Rules

2 Introduction

This document is a Report of the Public Consultation carried out by Carlisle Lake District Airport between 4th January 2018 and 29th March 2018, on the proposed change to the current airspace arrangement in the immediate surroundings of Carlisle Lake District 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 Carlisle Lake District Airport Airspace Change Proposal

Carlisle Lake District Airport is the sponsor of a proposed change to the current airspace arrangement in the immediate surroundings of Carlisle Lake District Airport, to allow aircraft to make more successful approaches during poor weather conditions using satellite positioning information. 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], Carlisle Lake District Airport is required to submit a case to the CAA to justify its proposed airspace change and to undertake consultation with aviation and non-aviation stakeholders. This ensures that stakeholders who may be directly or indirectly affected by the proposed change have an opportunity to provide comment on the proposal. Carlisle Lake District Airport has engaged Osprey Consulting Services Ltd (Osprey) to project manage the Airspace Change Process on their behalf.

This document is a report on the Public Consultation carried out by Carlisle Lake District Airport between 4th January 2018 and 29th March 2018. 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.

Carlisle Lake District Airport 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 subject of the consultation was Carlisle Lake District Airport's proposal to establish new RNAV arrival procedures. The overall aim of the Carlisle Lake District Airport Airspace Change Proposal (ACP) is to improve the existing facilities to support IFR operations, to provide resilience to existing IFR navigational facilities and to comply with the UK's commitment to ensure all airports have Performance Based Navigation (PBN) in service by 2024.

Carlisle Lake District Airport, as the sponsor of the proposed airspace change, is required to submit a case to the CAA to justify the change in airspace surrounding Carlisle Lake District Airport. In addition, as part of the CAA's Airspace Change

Process, it is Carlisle Lake District Airport's responsibility to consult with all relevant stakeholders who may be directly or indirectly affected by the proposal.

The purpose of the Public Consultation was to gather and analyse the views of the various aviation stakeholders and local authorities concerned regarding the effects of the proposed airspace change.

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, Carlisle Lake District Airport sent out notification to 70 consultees, comprising:

- 32 Aviation "National Organisations" (CAA National Air Traffic Advisory Committee (NATMAC list));
- 8 Airport Users;
- 7 Local Aerodromes/Flying Clubs;
- 15 Local Authorities;
- 6 Conservation and environmental charities; and
- 2 General Aviation organisations not included within the auspices of the NATMAC.

Of these, no emails or online forms were returned as undelivered or with errors. Therefore, the total number of consultees that received the consultation email was 70.

Further detail on the categories of consultee organisations is provided in Annex A2 of this report.

2.4 Consultation 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.

Carlisle Lake District Airport 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, they will not disclose personal details or content of responses or submissions to any third parties.

2.5 Document Structure

This document contains six main Sections and five 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 Carlisle Lake District Airport ACP; and

- Section 6 provides a list of references.

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;
- Annex A4 illustrates the consulted airspace design; and
- Annex A5 comprises a review of the proposed alternative suggestions.

3 Consultation Statistics

Carlisle Lake District Airport circulated the Consultation Document via email and online form to a total of 70 stakeholder consultee organisations or individuals. The Consultation Document was also posted on the Carlisle Lake District Airport website. 9 of the 70 organisations responded, and a further 30 responses were received by other individuals and organisations.

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 Carlisle Lake District Airport Consultation Document was circulated via email or online form to a total of 70 stakeholder consultee organisations, including 32 NATMAC organisations, and other individuals detailed in Annex A2.

The Consultation Document was made available for general distribution online through a dedicated link on the Carlisle Lake District Airport website.

Aviation stakeholder consultees included the MOD, airlines, aircraft operators, adjacent aerodromes, 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), and 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.

In addition, the following Local Authorities, and the Parish Councils that they are constituted by, were consulted:

- Carlisle City Council;
- Northumberland County Council;
- Allerdale Borough Council;
- Copeland Borough Council;
- Eden District Council;
- South Lakeland District Council;
- Tynedale District Council;
- Arthuret Parish Council;
- Beaumont Parish Council;
- Brampton Parish Council;
- Cummersdale Parish Council;
- Dalston Parish Council;
- Hayton Parish Council;
- Rockcliffe Parish Council; and

- Wetheral Parish Council.

The consultee groups are detailed in Figure 1 below.

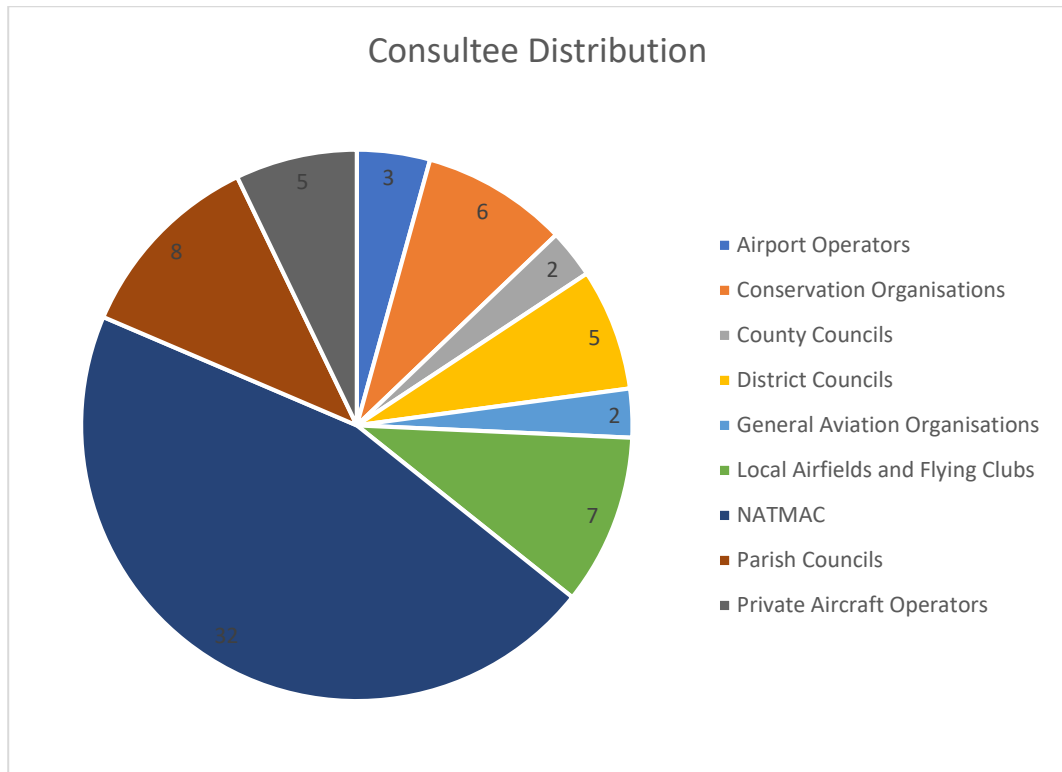


Figure 1 – Consultee Distribution

3.3 Consultation Responses

A total of 9 responses (12.9 %) to this consultation were received from the direct consultees. A breakdown of these is provided in Table 1 and Figure 2 below.

	Consultee Group	Number Consulted	Responses	% ¹
1	NATMAC	32	6	18.8%
2	Local Airfields and Flying Clubs	7	1	14.3%
3	Conservation Organisations	6	1	16.7%
4	County Councils	2	1	50.0%
5	District Councils	5	0	0.0%
6	General Aviation Organisations (not included in NATMAC)	2	0	0.0%
7	Parish Councils	8	0	0.0%
8	Airport Operators	3	0	0.0%
9	Private Aircraft Operators	5	0	0.0%
	Totals	70	9	12.9%

Table 1 - Consultee Responses

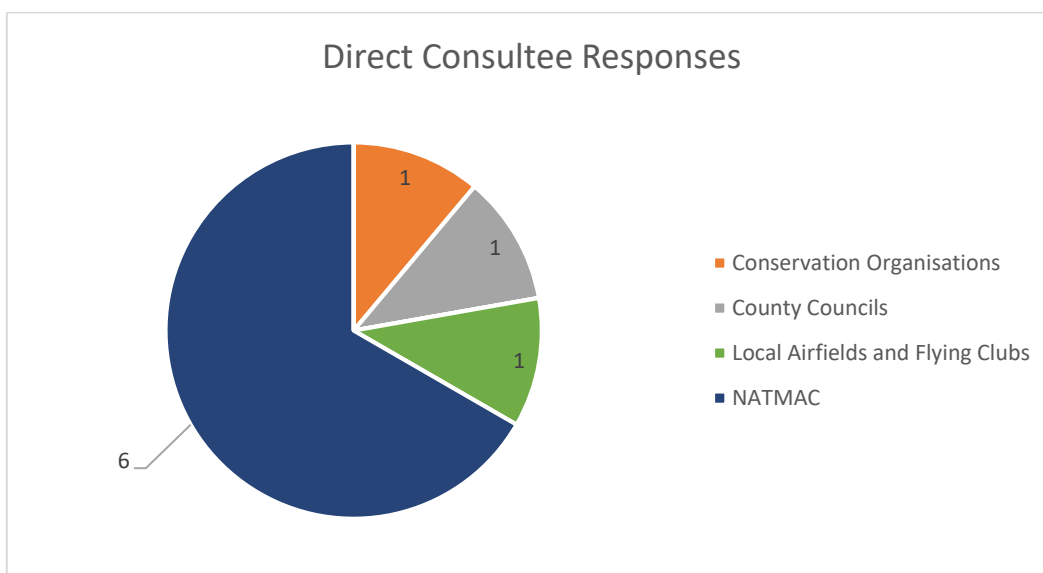


Figure 2 – Breakdown of Consultee Responses Received

¹ Percentage of those originally consulted.

In addition to the 9 responses received from direct consultees (distribution shown in Table 1), a further 30 submissions were received from other individuals or organisations making the total number of responses equal to 39.

It should be noted that “NATMAC” comprises 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.

The MOD provided a consolidated response, through the Defence Airspace and Air Traffic Management (DAATM) organisation, on behalf of all military consultees. This is standard MOD practice.

The majority of the responses received were from glider pilots and individuals associated with general aviation groups and organisations.

3.4 Meetings with Stakeholders

Prior to the commencement of the consultation period, Carlisle Lake District Airport representatives met with RAF Spadeadam representatives on 5th October 2017 to present the proposed RNAV routes and to discuss any impact the introduction of the routes might have on operations in Danger Area EGD510.

During the consultation period, Carlisle Lake District Airport hosted two drop-in sessions to allow anyone who may be affected by the proposed change to speak with members of the project team.

Details of the drop-in sessions that were organised are given in Table 2 below.

Meeting	Meeting Date	Notes
Drop-In Session at Carlisle Lake District Airport	13 th March 2018	Afternoon Session and Evening Session held

Table 2 - Stakeholder Meetings Held During the Consultation Period

3.4.1 Additional Meetings

Following the completion of the consultation period, meetings with stakeholders continued. Details of the post-consultation meetings are given in Table 3.

Stakeholder	Meeting Date	Notes
Newcastle International Airport (NIA)	June 2018	Representatives from Carlisle Lake District Airport met with NIA representatives to discuss the feasibility of a Letter of Agreement (LoA).
Stanwix Rural Parish Council Meetings	24 th August 2018	Members of the Stanwix Rural Parish Council visited Carlisle Lake District Airport to discuss the issues that they raised in their response

Table 3 - Additional Consultation Meetings

4 Analysis of Responses

Of the 39 individual responses received in total, 11 supported the proposal, 21 consultees objected to the proposal and 5 provided a neutral response or had no comments on the proposal. There were 2 consultees that did not register a formal response.

4.1 Overview

This section provides details on the number of responses received from the various organisations and individuals that were consulted. It also studies the percentage of stakeholder consultees that raised concerns about the proposal and 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 39 responses received during the consultation period:

- 11 consultees (28.2 %) supported the proposal;
- 21 consultees (53.9 %) objected to the proposal;
- 5 consultees (12.8 %) provided a neutral response or provided no comments on the proposal; and
- 2 consultees (5.1 %) asked questions for clarification purposes but did not formally provide a response.

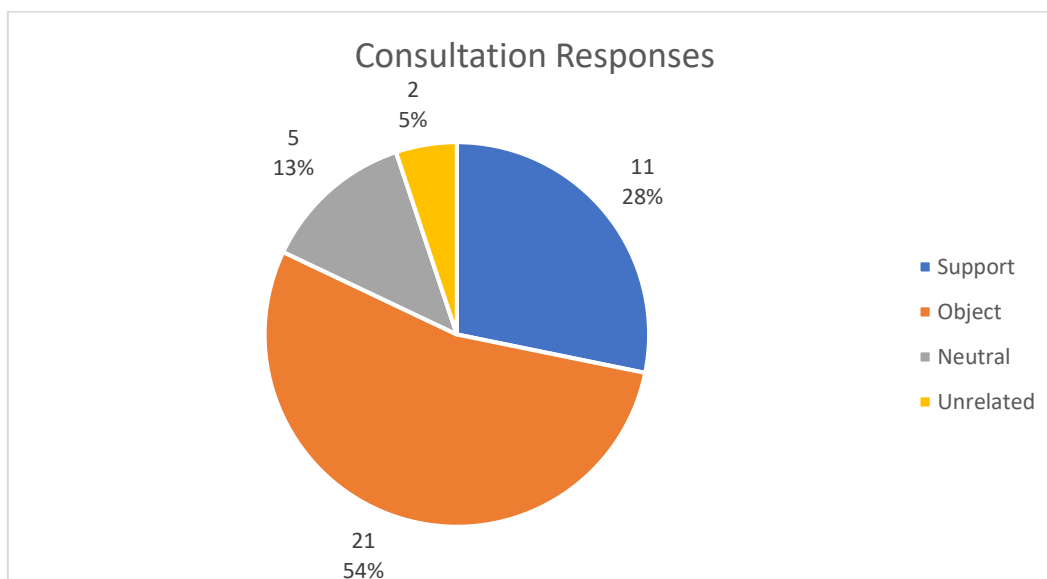


Figure 3 – Support Ratio from All Responses Received

4.3 Stakeholder Support Responses

A number of stakeholders have offered their support for the airspace and procedure developments. Support for the proposal came primarily from local residents, but also from members of the General Aviation community, who considered that development at Carlisle Lake District Airport would provide an economic boost to the local community, and from members of NATMAC.

4.4 Stakeholder Objection Responses

A total of 21 objections to the proposal were received throughout the consultation period. The consultee types and respective numbers are given below:

- 1 objection from NATMAC consultees;
- 1 objection from local authorities;
- 3 objections from local aerodromes or air sports clubs; and
- 16 objections from individuals within the aviation community.

The responses received are presented in more detail in Annex A3 of this report. The following sub-sections outline the nature of the objections received from local aviation consultees and NATMAC members (listed in alphabetical order).

4.4.1 British Gliding Association

The British Gliding Association (BGA) echoed a number of responses from local GA pilots who objected to the proposal based on the position of the Runway 06 Hold. They consider that the proposed position of the Hold is unsuitable because:

- The area surrounding the Hold is designated as the Lake District National Park and the overflight of commercial aircraft would affect the tranquillity of the area;
- The airspace the proposed Hold is located in is often used by soaring gliders and the BGA consider the introduction of a hold will institute a risk of collision; and
- The area in which the proposed Hold is located can experience weather conditions that lead to strong updrafts and downdrafts that can approach 1,500 ft per minute. Additionally, the area can experience weather conditions that promote strong icing conditions, therefore the BGA consider that the position of the Hold will create unnecessary danger to commercial air traffic.

However, the BGA supported the proposal to implement RNAV procedures overall if the Runway 06 Hold could be moved.

4.4.2 Newcastle International Airport

Newcastle International Airport (NIA) objected to the proposal because they considered that the Runway 24 Hold and approach procedure lie in the path of NIA's route to the west for both inbound and outbound traffic.

Following the response received from NIA, Carlisle Lake District Airport has liaised with NIA to ensure appropriate mitigations can be put in place to allow both airport's operations to continue safely.

4.4.3 Edensoaring Gliding Club

Edensoaring Gliding Club's response echoed the objections raised in the response from the BGA detailed above.

4.4.4 Cumbria Soaring Club

Cumbria Soaring Club (CSC) objected to the proposal primarily as a result of the position of the Runway 06 Hold. The CSC considers that when the wind is from the north-east, the area to the east and north-east of Blencathra (N54°38'26" W003°03'01" / NY323277) can be extremely busy with hang gliders and paragliders. They also consider that this increased activity would be at times when the Runway 06 Hold would be utilised and therefore there is a greater chance of conflict.

CSC also considers that the flying training schools at Carlisle Lake District Airport will utilise the Runway 06 Hold during Visual Flight Rules (VFR) conditions, and that the increased workload on the flying instructor will impair their ability to see hang gliders and paragliders operating in the area.

4.4.5 Stanwix Rural Parish Council

Stanwix Rural Parish Council expressed concerns over the continued use of the Non-Directional Beacon (NDB) at Carlisle Lake District Airport and considered that the consultation document did not adequately explain how the NDB will be phased out.

Stanwix Rural Parish Council considered that the information provided in the consultation document was not sufficiently clear to provide a meaningful exercise in public consultation.

Stanwix Rural Parish Council also considered that the displacement of approaches to Runway 06 by 250m will result in enhanced levels of driver distractions due to the increased proximity of low flying aircraft.

4.5 Objections from Individuals

Of the 30 responses to the consultation received from those not in the formal consultee list, the majority were from local residents and glider pilots; all of the glider pilots are also members of local flying clubs.

Notwithstanding that their representative organisations may have submitted detailed responses to the consultation on behalf of their membership, all of the additional individual submissions have been documented and analysed by Carlisle Lake District Airport and will form part of the formal ACP to be made to the CAA in due course. Any new issues identified in the individual submissions which had not already been raised by the formal consultees are embraced within the key issues (Table 4) and areas of concern listed in Annex A3 to this report.

The objections received from individuals came exclusively from members of the General Aviation community. All the responses received echoed the concerns raised by the organisations listed above, principally that the position of the Runway 06 Hold would restrict glider operations in an area popular for glider flying, and that area is prone to severe weather which would impact aircraft holding.

4.6 Key Issues Arising from Objections

The response analysis process identified a number of key themes in those responses that objected to the proposal. These are outlined in Table 4 below together with the number of consultees who expressed that view in their response.

Nature of Objection	Number of Responses
Restriction on glider flying / Runway 06 Hold area used extensively by gliders	18
Runway 06 Hold area has adverse weather conditions	13
Increased risk of mid-air collision	6
Impact of noise / Impact on National Park	4

Table 4 - Nature of Objections Raised by Consultees

The overwhelming majority of objections to Carlisle Lake District Airport's ACP centre around the position of the Runway 06 Hold on the related rationales that the area is one of high glider activity, the area is prone to adverse weather conditions and the area is a popular tourist destination, so a potential increase in noise would be unwelcome. The majority of objections recommend that the hold point is moved to be over the Solway Firth. Four objections, including the response of Edensoaring Gliding Club, stated that they would remove their objections if the Runway 06 Hold was moved in this manner.

The key concerns and Carlisle Lake District Airport's consideration of them, are detailed at Annex A3 to this report.

4.7 Stakeholder Neutral Responses

4.7.1 NATS

NATS provided no objection to the establishment of the proposed procedures; however, they sought clarification as to whether the existing inbound procedures for traffic from the en-route network would be changed in any way. Additionally, NATS requested that they receive sufficient notice of a planned implementation date to allow NATS Prestwick to conduct any necessary internal procedure/system changes and controller training/briefing.

4.7.2 Ministry of Defence

The MOD via Defence Airspace and Air Traffic Management (DAATM) provided no objections to the proposal but offered a number of observations to be taken into account.

Due to the proximity of the proposed procedures to the Danger Area EGD510, Carlisle Lake District Airport should be aware that some of the high-energy manoeuvres undertaken in the area may result in Airborne Collision Avoidance

System (ACAS) alerts for aircraft undertaking the proposed procedures. Additionally, whilst training activities will be undertaken within EGD510, military aircraft may choose to manoeuvre outside of the Danger Area, however they will be operating in accordance with the Rules of the Air.

DAATM also stated that in the interests of safety and to maintain operational output, the final proposal for Carlisle Lake District Airport procedures must not create any restrictions for MOD activity inside the Danger Area.

5 Post Consultation Actions

Following the consultation process Carlisle Lake District Airport has undertaken a period of review based on the feedback provided during the consultation phase prior to submitting a formal ACP to the CAA.

5.1 Post-Consultation Review

Following the 4th January 2018 to 29th March 2018 consultation period, all comments received have been thoroughly reviewed by Carlisle Lake District Airport in order to identify the key issues of concern. Carlisle Lake District Airport remains committed to mitigate, as far as is practicable, the principal concerns of those consultees who objected to this proposal.

The approach taken by Carlisle Lake District Airport was to review the procedure design in the light of the significant points of objection raised by consultees and to continue a dialogue with the principal objectors to assuage, as far as is practicable, the concerns raised.

5.2 Post-Consultation Airspace Development

5.2.1 Position of Runway 06 Hold

Figure 4 to 8 in Annex A4 shows the designs of the Carlisle Lake District Airport RNAV procedures as defined for the 4th January 2018 to 29th March 2018 consultation.

Following a thorough review of the objections received and the potential options, Carlisle Lake District Airport has decided to submit the designs as they were presented within the Consultation Document to the CAA for consideration. The reasons for this are:

- RW 06 is only in use for approximately 30% of the time due to the prevailing wind being mainly from the south-west/west.
- The hold is unlikely to be used frequently. The existing hold in the overhead will be retained, and this will be the preferred hold to use as it keeps aircraft closer to the Airport. However, the new holds at the IAFs provide additionally flexibility should this hold not be available for any reason.
- The area is not considered by the CAA to be Mountainous Terrain and therefore the design does not have to take this into consideration.
- The hold has been designed to comply with the minimum safety altitude for the regions and will be terrain safe.
- Any gliders operating within this area will be VFR; any aircraft operating within the hold will be IFR. Aircraft operating VFR are responsible for maintain safe separation from other aircraft and obstacles under the 'see and avoid' principle.

- On the rare occasion that the RW 06 is used, Carlisle Lake District Airport could consider a broadcast or other notification mechanism to alert gliders or GA that the hold is active, and that VFR aircraft should be extra vigilant. This could be formalised within a Letter of Agreement, perhaps with Edensoaring Gliding Club.

5.2.2 Interaction with Newcastle International Airport

Newcastle International Airport raised objections based on the potential for conflict with aircraft under its control routing to and from the west. This route is heavily utilised for aircraft routing to Belfast, Dublin and the Isle of Man.

Following discussions with Newcastle International Airport, a Letter of Agreement (LoA) has been drafted to ensure that both airports are able to continue to operate safely and efficiently following the implementation of the proposed procedures. The LoA is in the process of being reviewed by Carlisle Lake District Airport.

5.2.3 Interaction with Stanwix Rural Parish Council

Stanwix Rural Parish Council raised objections on a number of issues. Representatives from Stanwix Rural Parish Council were invited to the airport to discuss the issues they had raised.

5.2.4 Interaction with Edensoaring Gliding Club

As a prominent local gliding club, Carlisle Lake District Airport is proposing a visit to Edensoaring Gliding Club to discuss the concerns raised in their response.

5.3 Carlisle Lake District Airport Conclusions

The Consultation has produced some moderate opposition from the GA community supported by the BGA and local gliding clubs. The main emphasis of the concerns are as follows:

- The proposed location of the Runway 06 Hold is an area popular with the gliding community and would restrict the ability of gliders to operate there and increase their risk of mid-air collision;
- The proposed location of the Runway 06 Hold is prone to severe weather conditions that would adversely affect aircraft operating there;
- The proposed location of the Runway 06 Hold is directly overhead a National Park, and the noise of commercial aircraft would negatively impact tourism to the area.

Additionally, the Consultation has received an objection from Newcastle International Airport based on the potential risk of conflict for aircraft under their control routing to and from the west and aircraft operating in the Runway 24 Hold. A meeting held with the Manager Air Traffic Services (MATS) at Newcastle International Airport resulted in the drafting of an LoA to ensure that both airports are able to continue to operate safely and efficiently following the implementation of the proposed procedures.

5.4 ACP - Next Stages

The consultation process constitutes the fourth stage of the CAA's overall process detailed in CAP 725 [Reference 1] leading to an ACP.

It is a requirement of the consultation process that Carlisle Lake District Airport provides the CAA with full details of the consultation (including copies of responses and correspondence) together with all documentation necessary for the promulgation of the proposed airspace change.

Following receipt of the formal ACP, the CAA requires a 16-week period to conduct its own internal analysis of the final proposal and consultation results, before arriving at a Regulatory Decision.

Carlisle Lake District Airport would like to notify consultees that should any representative organisation wish to present new evidence or data to the Group Director, SARG for his consideration prior to making his regulatory decision regarding a Change Sponsor Proposal, the representative organisation must submit, in writing, the information to the following address:

Group Director,
Safety and Airspace Regulation Group,
CAA House,
45-59 Kingsway,
LONDON
WC2B 6TE

In the event that the CAA accepts the ACP, without the need for further design optimisation or analysis, then it is proposed that implementation takes place on a single date. All new Instrument Flight Procedures (IFPs) would be activated simultaneously, on a double AIRAC (Aeronautical Information Regulation and Control) cycle.

6 References

Reference	Name	Origin
1	CAP 725 CAA Guidance on the Application of the Airspace Change Process Fourth Edition 15 th March 2016	CAA
2	Code of Practice on Consultation July 2008	Cabinet Office URN 08/1097

Table 5 - Table of References

A1 Consultation Background and Methodology

A1.1 Background to the Consultation

Carlisle Lake District Airport has embarked on an exciting programme of development that will see an upgrade to the runway and associated infrastructure, including runway and approach lighting, alongside the construction of a new terminal building. These improvements were intended to ensure that the Airport was ready when passenger services between its sister airport at London Southend, as well as Belfast and Dublin were introduced.

In addition to these planned improvements, Carlisle Lake District Airport has commenced a project to introduce new Instrument Flight Procedures (IFPs) to assist aircraft making approaches to the airport during inclement weather. The existing arrangements for poor weather arrivals rely upon Non-Directional Beacon (NDB) and Distance Measuring Equipment (DME) navigational aids. Many airports in the UK are transitioning from conventional navigation equipment, to newer satellite-based approaches which use Global Positioning Satellites (GPS) similar to those used for car navigation systems.

The key drivers for introducing the new procedures are as follows:

- Improvement to existing facilities to support IFR operations;
- To provide resilience to the existing IFR navigational facilities;
- To comply with the UK's commitment to ensure all airports have Performance Based Navigation (PBN) in service by 2024.

Whilst the Airport has declared its intention to introduce passenger services, the requirement for the introduction of RNAV (GNSS) procedures is not based upon these services.

Carlisle Lake District Airport, as the Sponsor of the proposed airspace change, is required to submit a case to the CAA to justify the change in the airspace surrounding the airport. In addition, as part of the CAA's ACP, it is Carlisle Lake District Airport's responsibility to consult with relevant stakeholders who may be directly or indirectly affected by the proposal.

A1.2 Methodology

The Carlisle Lake District Airport ACP Public Consultation was conducted in accordance with the principles set out in the Cabinet Office Code of Practice on Consultation [Reference 2], as required by the CAA.

A comprehensive Consultation Document was prepared by Carlisle Lake District Airport, presenting the proposal, rationale for the change, the perceived effects, and mitigation measures considered by the airport.

A link to the Consultation Document was made available on the Carlisle Lake District Airport website. Consultees were notified by email, or online form, alerting them to the consultation and how to access the Consultation Document.

The development of the proposed procedures tried to replicate, where practicable, the existing IFR procedures. There is no request for Controlled or Regulated Airspace to support this application, and there will be very minimal impact on other aviators operating within the Carlisle area.

Full consultation commenced with wide circulation of the electronic Consultation Document and conceptual procedure designs to all identified stakeholders on 4th January 2018. The required minimum period for formal consultation is twelve weeks and the consultation ended on 29th March 2018.

Consultees were asked to consider the proposal and submit a response to Carlisle Lake District Airport using a dedicated email address (CarlisleAirportConsultation@ospreydsl.co.uk). Written responses submitted by post were also accepted.

A2 Stakeholder Consultee List

A2.1 National Bodies

National Bodies	
3rd Air Force USAF-E	British Helicopter Association
Airfield Operators Group	CAA IoM
Airport Operators Association	Defence Airspace and Air Traffic Management
Aircraft Owners and Pilots Association	General Aviation Alliance
Aviation Division NCHQ	General Aviation Safety Council
Aviation Environment Federation	Guild of Air Traffic Control Officers
British Airways	Heavy Airlines
BAE Systems	Helicopter Club of Great Britain
British Airline Pilots' Association	Honourable Company of Air Pilots
British Business and General Aviation Association	Light Aircraft Association
British Gliding Association	Low Fares Airlines
British Hang Gliding and Paragliding Association	NATS
British Microlight Aircraft Association	PPL/IR Europe
British Model Flying Association	UAVS
British Parachute Association	UK Airprox Board
British Balloon and Airship Club	UK Flight Safety Committee

A2.2 Airport Operators

Airport Operators	
Stobart Air	
FlyBe	
Air Ambulance	

A2.3 Local Airfields and Flying Clubs

Flying Clubs	
Berrier Airfield	Cumbria Microlight Training Centre
Border Air Training	Kirkbride Airfield
Carlisle Flight Training	Skelling Farm (Edensoaring Gliding Club)
Cumbria Gyroplanes	

A2.4 Private Aircraft Operators

Private Jets
Apollo Air Services
Flightworx (WA Developments)
JetFly
JOTA Aviation
NetJets

A2.5 Conservation Organisations

Conservation Organisations	
Environment Agency	
Historic England	
National Trust	
Natural England	
RSPB	

A2.6 General Aviation Organisations not included in NATMAC

General Aviation Organisations	
All Parliamentary Group for General Aviation	
General Aviation Awareness Council	

A2.7 County Councils

County Councils	
Carlisle City Council	Northumberland County Council (by post)

A2.8 District Councils

District and Borough Councils	
South Lakeland District Council (by post)	Eden District Council (by post)
Allerdale Borough Council (by post)	Copeland Borough Council (by post)
Tynedale District Council	

A2.9 Parish Councils

Parish Councils	
Arthuret Parish Council	Beaumont Parish Council
Brampton Parish Council (by post)	Cummersdale Parish Council
Dalston Parish Council	Hayton Parish Council
Rockcliffe Parish Council	Wetheral Parish Council

A3 Key Issues and Areas of Concern Arising from the Consultation

No	Issue	Carlisle Lake District Airport Comment
1	The position of the Runway 06 Hold restricts glider operations	<p>The presence of the hold should not in itself restrict glider operations. The proposed location is within Class G airspace where the onus is on VFR aircraft to maintain separation from IFR aircraft by using 'see and avoid' principles. There is already an existing IFR procedure that utilises the NDB/DME so VFR aircraft should expect IFR aircraft to be flying within the area to the south-west of the Airport.</p> <p>RW 06 is used for approximately 30% of the time since the prevailing wind dictates more frequent use of RW 24. The existing hold in the Airport overhead is to be retained and will be the most frequently used holding area. The establishment of additional holds at the IAF for the procedures provides additional flexibility should it be required.</p>

No	Issue	Carlisle Lake District Airport Comment
2	The weather conditions at the Runway 06 Hold is unsuitable for holding aircraft	Several consultees expressed concern that the weather phenomena experienced over the proposed Runway 06 Hold location would deem it unsuitable for use by passenger aircraft. The Procedure Designer confirmed that where an area is deemed to be Mountainous terrain then specific criteria applies to the design process. However, confirmation from the CAA has determined that this area of the Lake District is not considered to be Mountainous terrain and therefore the MSA applied is 300m (1,000ft). The hold is not expected to be used frequently. Should an aircraft experience challenging weather conditions this will be reported to ATC and handled accordingly.
3	The position of the Runway 06 Hold increases the risk of mid-air collisions for gliders.	Glider operations must take place in VFR conditions. In Class G airspace the minimum requirements for VFR flight operating below FL 100 (approximately 10,000 ft) are that aircraft should remain 1,000 ft vertically from cloud, 1,500m horizontally from cloud and have an inflight visibility of at least 5 km.

No	Issue	Carlisle Lake District Airport Comment
4	The position of the Runway 06 Hold impact on the enjoyment of a National Park.	<p>Those consultees who objected to the proposed location of the RW 06 Hold suggested that the hold should be relocated to the Solway Firth. However, not only would this mean that aircraft potentially hold further away from the Airport, the Solway Firth is designated as an Area of Outstanding Natural Beauty (AONB).</p> <p>As explained within point 1 above, RW 06 is only used for approximately 30% of the time. In addition, Carlisle Lake District Airport does not consider that the hold will be used frequently and that when it is in use, the minimum holding level of any aircraft will be at least 1,000 ft above the highest obstacle. This should not be intrusive to walkers within the area.</p>

No	Issue	Carlisle Lake District Airport Comment
5	The position of the Runway 24 Hold conflicts with routes flown by aircraft under the control of Newcastle International Airport routing from and to the west.	<p>The RW 24 procedure has been designed to be broadly similar to the profile used by the existing NDB/DME procedure for RW 24. The addition of a hold at the IAF is purely to provide additional flexibility to both pilots and ATC should an aircraft not be able to position for an approach immediately. However, the hold in the overhead will be retained, and this will be the preferred hold to be used.</p> <p>Should the Runway 24 Hold be required by an aircraft, Carlisle ATC will have already issued a squawk for the aircraft to use which will notify any ATC unit with secondary surveillance capability to see which ATC unit is controlling the aircraft. Newcastle ATC will be able to either avoid the aircraft, by using lateral and vertical separation (if the aircraft is Mode C/S equipped). Alternatively, Newcastle will be able to see that Carlisle is working the aircraft, and a telephone call could be made to agree to a course of coordination. Carlisle and Newcastle Airports could formalise an arrangement to obligate one or both parties to provide traffic information about aircraft within the Haltwhistle area should this be deemed necessary. Agreement in principle for a Letter of Agreement has been made.</p>
6	The consultation document is flawed as an instrument of public consultation.	The Consultation Document was viewed by the CAA prior to commencement of the Public Consultation period and it was deemed to be suitable. A representative from the CAA attended the Public Drop-In sessions and ensured that they were conducted in accordance with CAP 725 policy.

A4 The Consulted Carlisle Lake District Airport Procedure Design Proposal

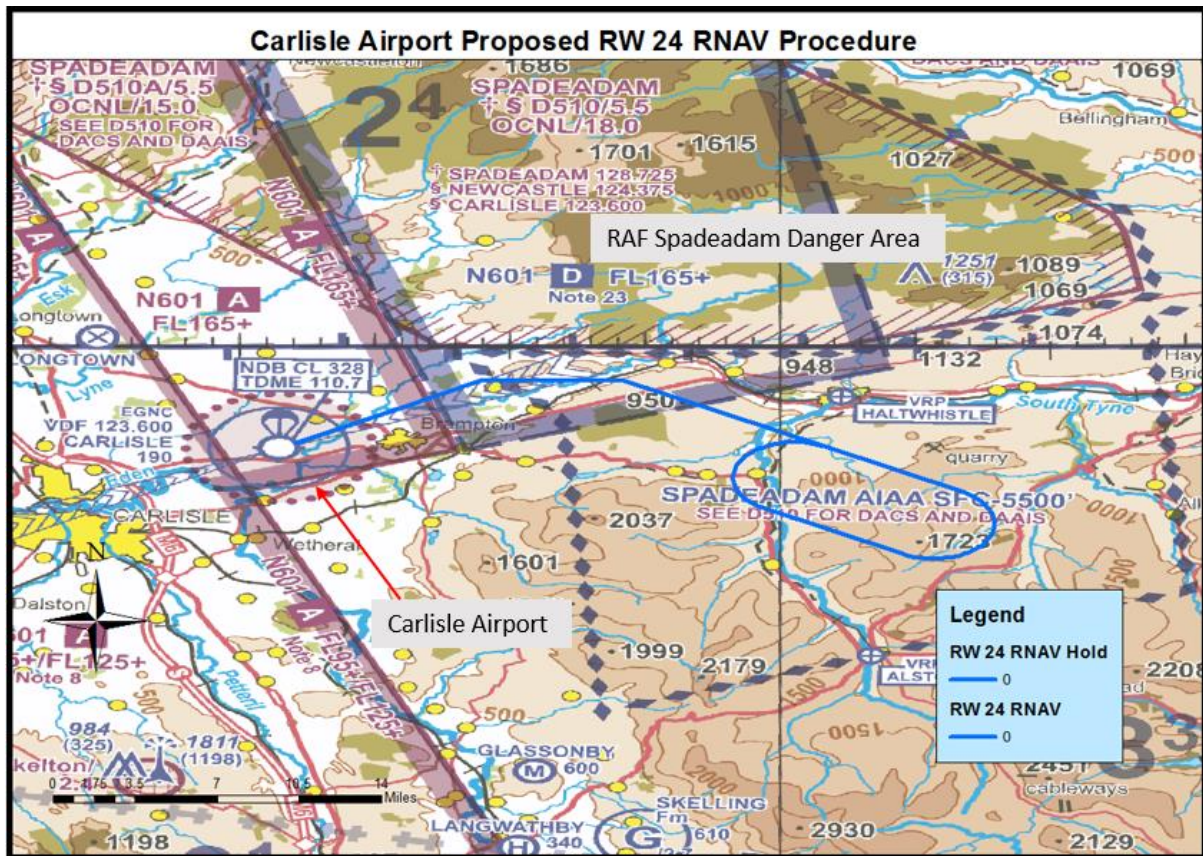


Figure 4 – Consulted RW 24 RNAV Design Concept

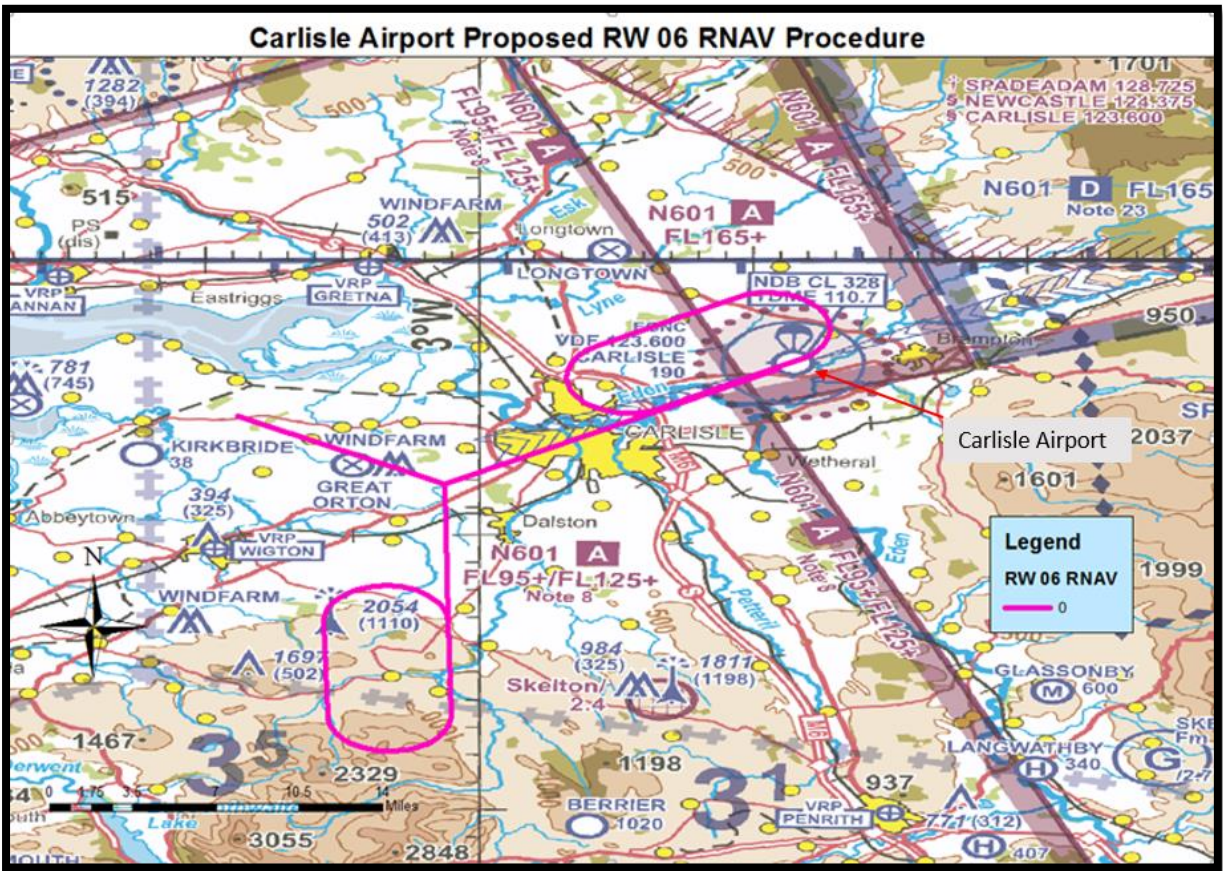


Figure 5 – Consulted RW 06 RNAV Design Concept

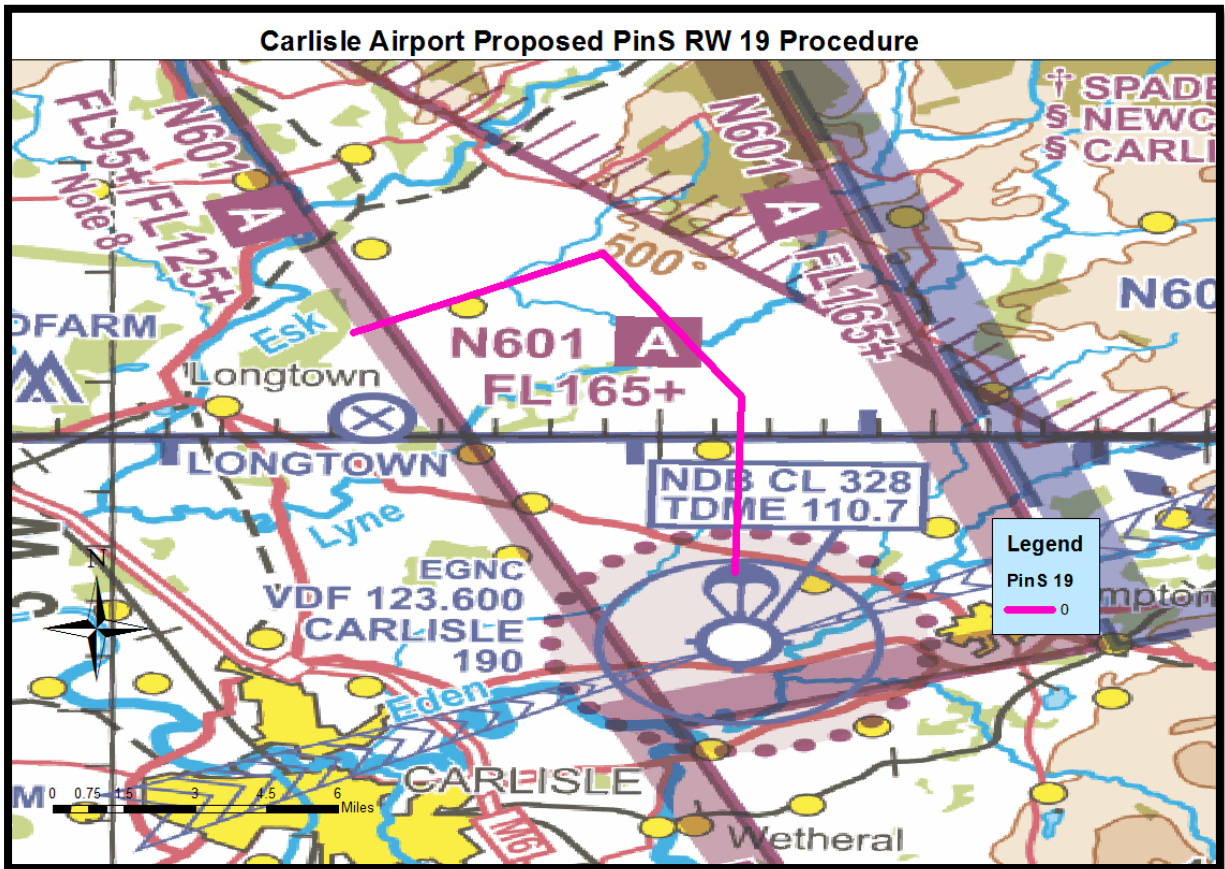


Figure 6 – RW 19 PINS Consulted Procedure Design Concept

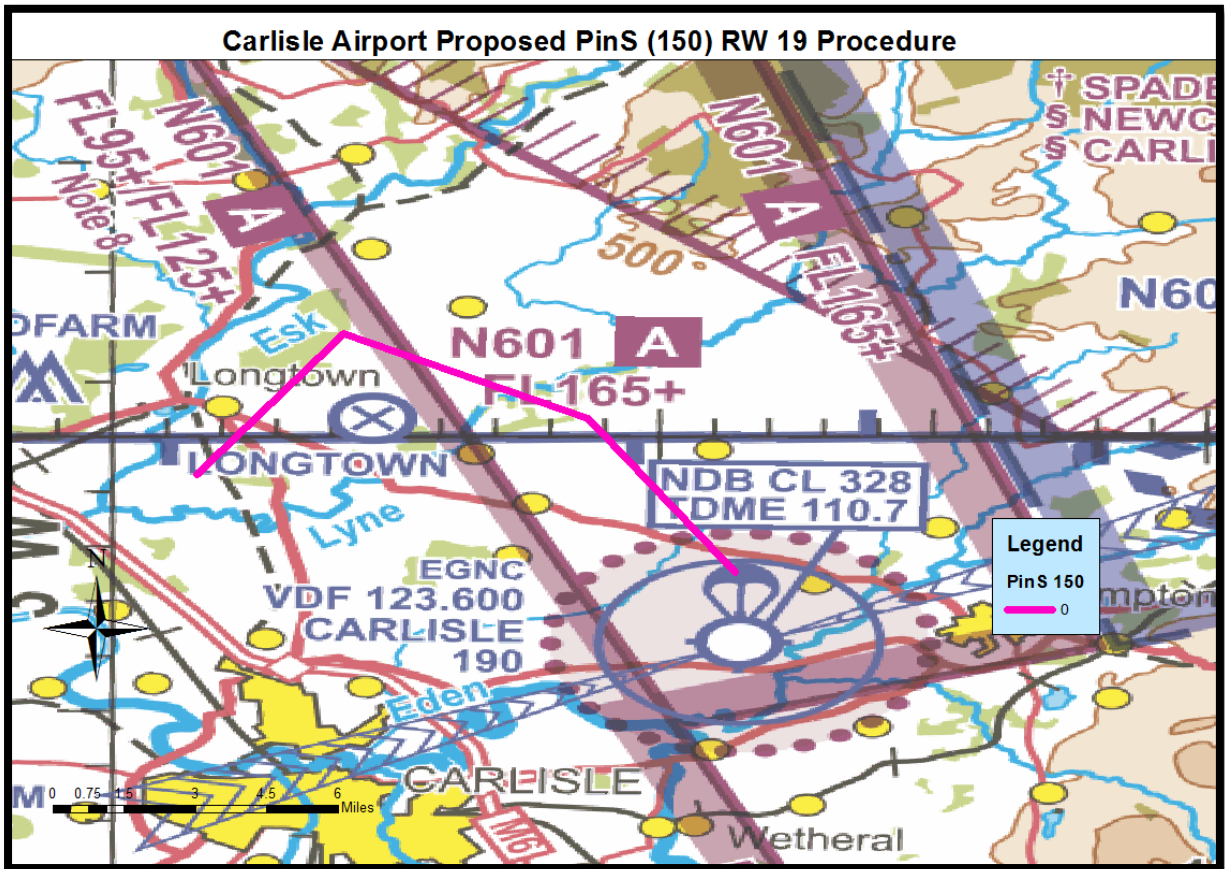


Figure 7 – Consulted Offset RW 19 PINS (150) Design Concept

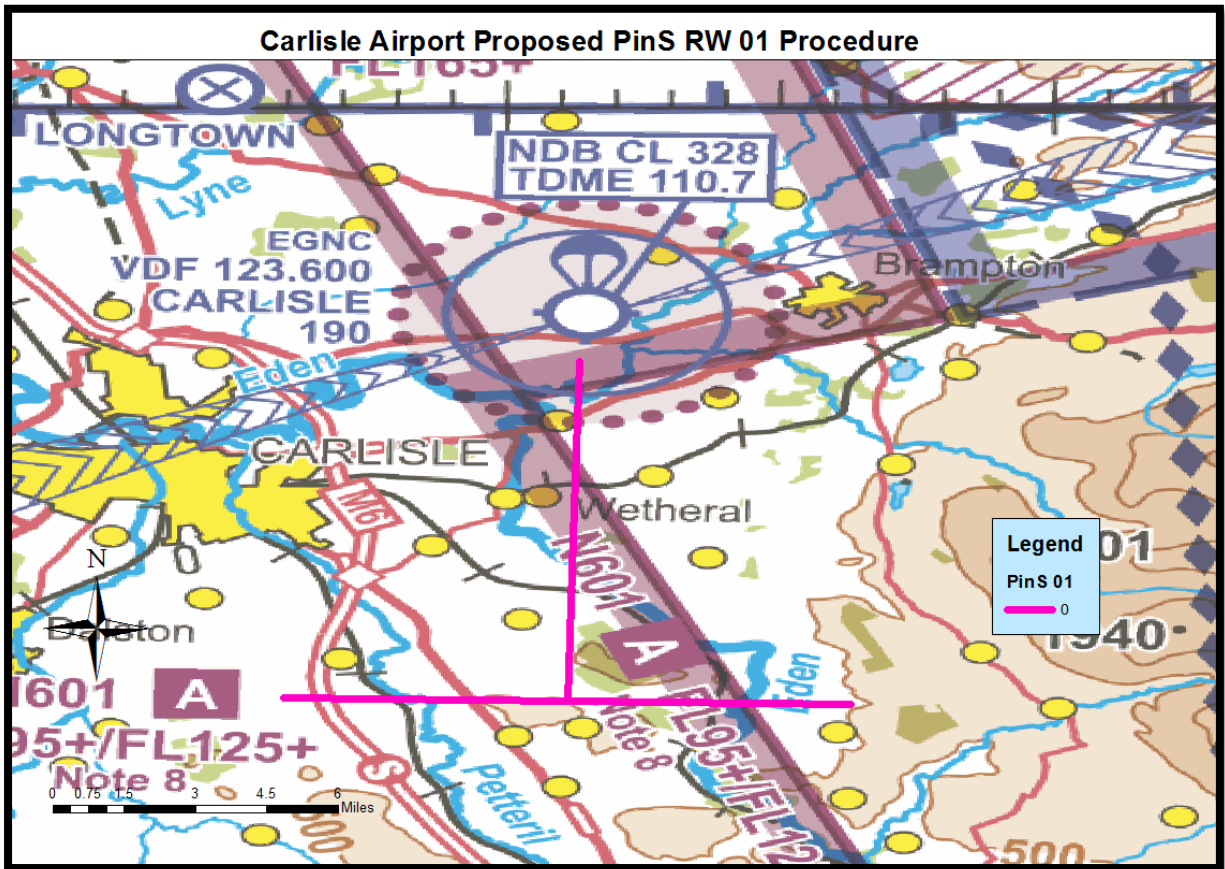


Figure 8 – Consulted RW 01 PINS Design Concept

A5 Review of Proposed Alternative Suggestions

Procedure	Summary of proposed changes	Summary of Discussion
Runway 06 Approach	<ul style="list-style-type: none"> – Move position of Runway 06 Hold over the Solway Firth 	<p>This is not considered to be practical since the Solway Firth is an AONB and is further away from the Airport. The existing hold in the overhead is to be retained, and this will be the preferred hold. The Runway 06 Hold will be used very infrequently.</p>
	<ul style="list-style-type: none"> – Move position of Runway 06 Hold further north 	<p>See above</p>
Runway 24 Approach	<ul style="list-style-type: none"> – Move position of Runway 24 Hold to be overhead Carlisle Lake District Airport (and install a radar) 	<p>The existing hold in the overhead will be retained as well as the proposed holds at the IAFs. It is envisaged that the preferred hold will continue to be the hold in the overhead. However, having a hold at the commencement of the RNAV procedure provides additional flexibility should an aircraft require to hold prior to commencing the procedure – for example, if the pilot is dealing with a minor emergency.</p> <p>Although Carlisle Lake District Airport is embarking on a significant infrastructure upgrade, there are currently no plans to install a surveillance capability (radar). IFR control procedures will continue to be provided in a procedural environment.</p>