



## **Report of Engagement Activity**

### **Previously Consulted on Airspace to the North East and East of LSA**

#### **Introduction**

London Southend Airport (LSA) is proposing to submit to the Civil Aviation Authority (CAA) a case to implement two pieces of airspace to the North East and East of the airfield. LSA originally requested the airspace as part of the Airspace Change Proposal to re-establish controlled airspace back in 2014 but at the time it was not granted by the CAA. LSA in agreement with the CAA elected to carry out further engagement to ensure stakeholders, who maybe impacted by the implementation of the airspace, were fully informed.

This is a report of the engagement activity that was carried out by LSA between 19<sup>th</sup> July 2019 and 30<sup>th</sup> August 2019. During this period a number of stakeholders requested an extension of time to be able to provide their feedback / responses which LSA granted. LSA has not formally closed the Engagement Activity and will continue to liaise with stakeholders should further questions / feedback be raised.

#### **Methodology**

A comprehensive Engagement Document was prepared by the team at LSA. The CAA also provided advice on the development of the Engagement Document prior to it being published.

The engagement invitation was distributed to stakeholders via email, which also provided a link to the Engagement Document which was available to download from the LSA website. Copies of the previous Airspace Consultation Document and Airspace Consultation Report were also available to download. Two hard copy letters sent to those without email contact.

Within the engagement period stakeholders were asked to provide any feedback on the proposals or raise any queries that they may have. Feedback was requested to be sent to a dedicated email address or in writing if preferred.

Details of the proposal were publicised on a dedicated page on the LSA website, which contained links to the Engagement Document as well as the original Airspace Consultation Document and the Airspace Consultation Report. Between 19<sup>th</sup> July 2019, when the engagement launched and 30<sup>th</sup> August 2019 there were 427 page views, with an average time of 4 minutes spent on the page. Of the 427 views, 402 entrances to the website began on that page. Between 31<sup>st</sup> August 2019 until 30<sup>th</sup> November 2019, whilst the webpage has remained live and we have had additional responses to the engagement, there have been a further 81 page views, with 33 entrances to the website beginning on that page.

To ensure that stakeholders or anyone with an interest in the proposals had the opportunity to be able to discuss the proposals or ask any questions, an open evening was held on the 20<sup>th</sup> August 2019, where members of the team from LSA were available. The event was publicised in the Engagement Document, on the website and in an invite to all sent to all stakeholders.

The open evening was held at the airport between 1700-2100, with 3 attendees visiting, to find out more about the proposals. Following the open evening 2 of the attendees submitted their feedback to the engagement.

In order to try and promote maximum feedback and responses, LSA was proactive throughout the Engagement process, ensuring that stakeholders were reminded and encouraged to provide their feedback and respond to the engagement process.

A representative for the LSA Airspace Team attended the Airport Consultative Committee (ACC) meeting held on 4<sup>th</sup> September 2019 to provide more information on the proposals. The members of the ACC comprise local councils, resident's associations, trade councils and airport tenants.

Following a response from Natural England, dated 13<sup>th</sup> September 2019, which provided useful feedback, LSA felt further discussion would be beneficial. A conference call was arranged on 14<sup>th</sup> November 2019 to talk through all of the points raised and offer further information to the team at Natural England. This was followed by a written letter (28<sup>th</sup> November 2019) summarising the key points discussed. Natural England responded to LSA's written letter on 9<sup>th</sup> December 2019 by email seeking some clarifications and further information, LSA responded by email on 11<sup>th</sup> December 2019. Natural England provided a further response to LSA on 19<sup>th</sup> December 2019 by email to summarise their overall position. Natural England raised the possibility that the proposals may have effects to European protected sites, they are content for the CAA to determine whether a HRA (Habitats Regulations Assessment) is required.

## **Stakeholders**

The stakeholder list was developed using the consultee list from the original airspace consultation and specifically targets those stakeholders who would be affected by the two pieces of airspace proposed. Other stakeholders have been added to list who have shown an interest or may be affected since the introduction of controlled airspace in 2015.

The stakeholder list comprised of

- 39 Members of NATMAC
- 15 Representatives of National Bodies / Organisations
- 20 Airlines & Tenants
- 15 Airfields
- 51 Private Jet Companies / Owners (of which 3 are no longer in existence)
- 35 Essex Councils
- 10 Members of Parliament & Local Councillors

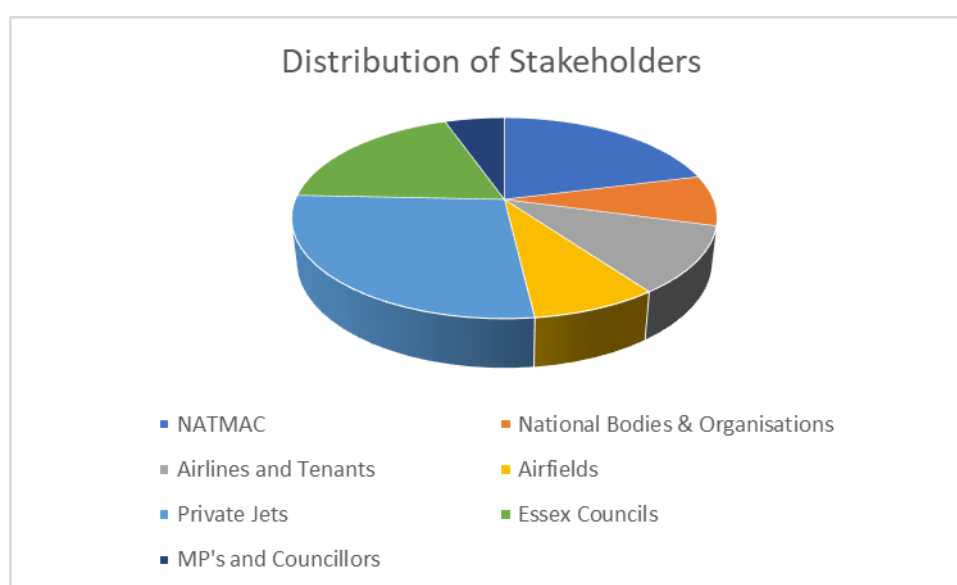
## **Confidentiality**

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

LSA undertakes that, apart from the necessary submission of material to the CAA and essential use by LSA's own members of staff for analysis purposes in developing this report and subsequent ACP material, LSA will not disclose the personal details or content of responses or submissions to any third parties.

## Statistics

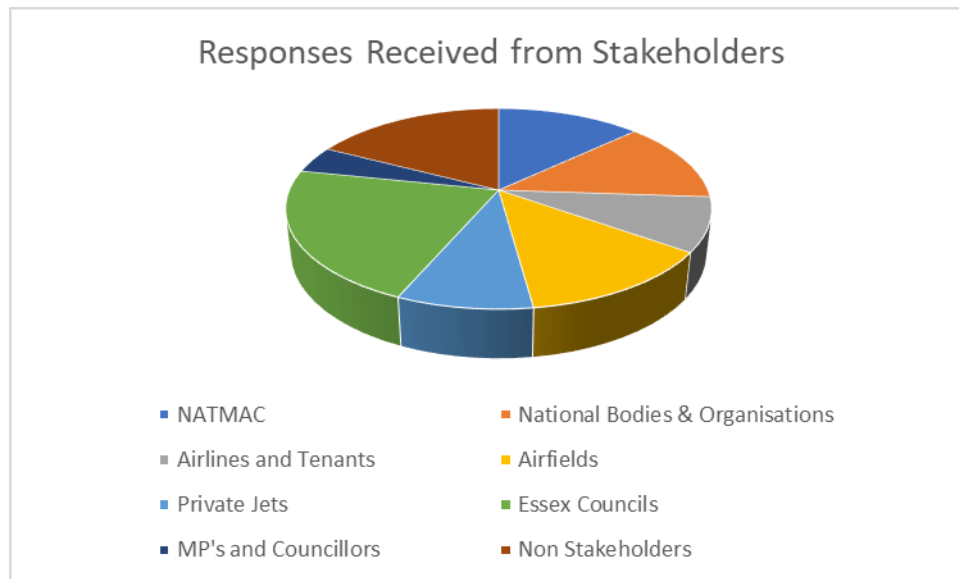
A total of 185 engagement invitations were sent to stakeholder organisations or individuals detailed in Appendix 03 of the Engagement Document, comprising airlines and other local airspace users, local aerodrome operators, members of the National aviation organisations represented on the CAA's National Air Traffic Management Advisory Committee (NATMAC). For non-aviation consultees, Officials of County, District, Borough, Town and Parish Councils over whose areas of interest the proposed controlled airspace would lay were consulted. Certain other representative environmental organisations were included, together with Members of Parliament and Local Councillors.



Submissions were received from individual members of the aviation community or members of the public, who were not on the stakeholder invitation list but were aware of the proposals and wanted to provide feedback. These have been included in the analysis of responses. A total of 4 submissions were received from Non-Stakeholders.

Responses were received from 23 stakeholders as follows

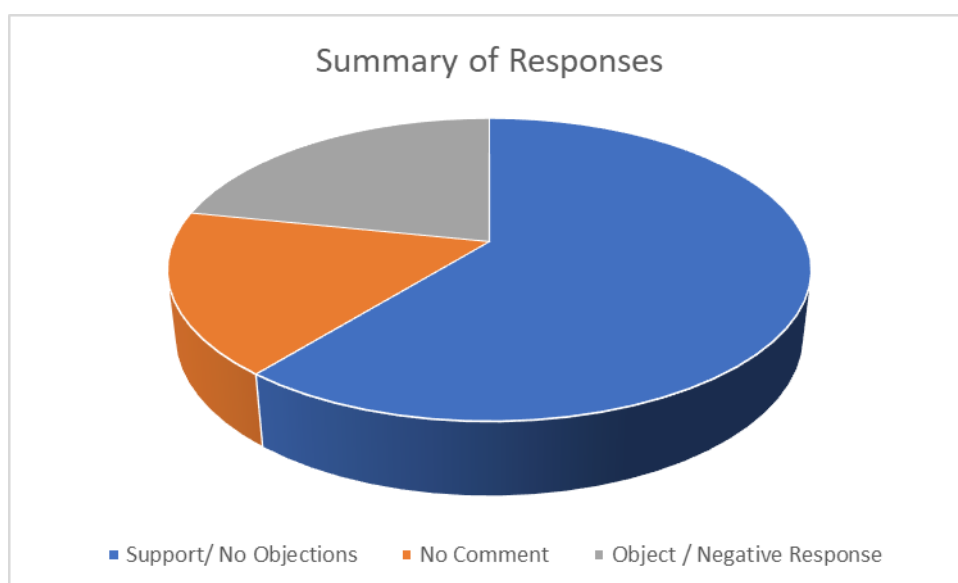
	<b>Stakeholder Group</b>	<b>Number Invited</b>	<b>Responses</b>	<b>%</b>
1	NATMAC	39	3	7.7
2	National Bodies / Organisations	15	3	20
3	Airlines & Tenants	20	2	10
4	Airfields	15	3	20
5	Private Jets	51	2	3.9
6	Essex Councils	35	5	14.3
7	MPs & Councillors	10	1	10
8	Non Stakeholders	N/A	4	N/A



### Analysis of Responses

Of the 23 responses received from stakeholders and non-stakeholders;

- 14 supported or had no objections to the proposal
- 4 stated they had no comment to make on the proposal
- 4 objected to the proposal or had a negative response to the proposal
- 1 objected, pending further information



## Key issues and themes arising from the Responses / Feedback

Ref	Feedback Raised	LSA Comment
1	Improvement to safety	As the traffic environment at LSA grows in complexity the proposed airspace will ensure a known and managed traffic environment
2	Improvement to operation	Improvements to Continuous Descent Approach (CDA). Provides a known and managed environment. Will allow 'tactical shortcuts' reducing track miles. Ability to utilise holding levels at GEGMU rather than using SND hold.
3	Revitalisation of LSA of great significance to whole area	LSA supports this statement and this was reflected in the engagement document as key drivers for requesting the additional airspace.
4	Noise and pollution impact minimised as majority of the airspace is over the sea	LSA supports this statement and this was reflected in the engagement document as key drivers for requesting the additional airspace. The introduction of this airspace will allow LSA ATC to utilise airspace over the sea rather than over the land which has major noise and environmental benefits.
5	Aircraft can be held over the sea, rather than over residential areas	Today, LSA primarily use the 'SND' hold which is overhead the airfield at levels 2000ft and 3000ft. As well as aircraft operating at lower levels whilst holding, it also limits the height of departing aircraft, for example if there is an aircraft holding at 3000ft a departing aircraft would be limited to 2000ft until clear of the hold. By introducing CTA10X LSA will have the option to use the GEGMU hold at levels 4000ft and 5000ft, therefore improving the height at which aircraft hold, as well as holding aircraft over the sea, rather than overhead land and populated areas.
6	Commercial efficiency	Fewer track miles – saving in fuel. CDAs. Unlikely to get avoiding instructions taking aircraft off planned routes. Tactical shortcuts can be taken advantage of.
7	Fuel saving	The increased area of CTA 10 and introduction of CTA 11 would allow LSA ATC to offer many fuel saving opportunities, often being able to keep aircraft higher than the present airspace configuration allows. In principle, aircraft flying at higher levels will burn less fuel.
8	Time saving due to better flow of traffic	The additional airspace will allow arriving aircraft to reduce their track miles (shorter approaches).

		This also allows LSA to use the airspace more efficiently.
9	Aircraft will be forced to conduct low sea crossings under CTA 10X – concern for flight safety (esp single engine planes). (Impact of CTA 11 is noted as minimal with regard to the above comment)	Base of CTA 10X is 3500ft, therefore aircraft not wishing to enter controlled airspace may fly up to the base of CTA 10X without speaking to LSA ATC. Aircraft wishing to conduct a sea crossing at higher altitude may contact LSA ATC to receive clearance through controlled airspace. Since the introduction of Controlled Airspace in 2015, LSA ATC have managed the airspace appropriately and have given fair access to airspace users. LSA ATC have accepted over 99% of the requests for entry into the current controlled airspace.
10	Aircraft forced to fly increased track miles over the sea – concern for flight safety	Base of CTA 10X and CTA 11 are 3500ft, therefore aircraft not wishing to enter controlled airspace may fly up to the base of CTA 10X without speaking to LSA ATC. Aircraft wishing to conduct a sea crossing at higher altitude may contact LSA ATC to receive clearance through controlled airspace. Since the introduction of Controlled Airspace in 2015, LSA ATC have managed the airspace appropriately and have given fair access to airspace users. LSA ATC have accepted over 99% of the requests for entry into the current controlled airspace.
11	Increase controller workload and traffic, therefore access to the airspace will be delayed or access refused	Since the introduction of Controlled Airspace in 2015, LSA ATC have managed the airspace appropriately and have given fair access to airspace users. LSA ATC have accepted over 99% of the requests for entry into the airspace. LSA ATC have the ability to operate two radar positions which manage access to and aircraft operating within the airspace. The additional airspace that is proposed will allow the controller to be able to move aircraft out over the sea to give capacity to accommodate transit flights in other parts of the airspace.
12	Increase movements over Dengie Hundred Peninsula	The current airspace that was implemented in 2015, sits above the Dengie Peninsular at various altitudes. This proposal does not seek to change the existing airspace arrangement. The 2 pieces of airspaces that are proposed do not sit above the Dengie Peninsula. The majority of CTA 10X sits over the sea, with the remaining portion over the district of Tendring and a small slither of Mersea Island, which falls under the borough of Colchester. CTA 11 sits wholly over the sea to the East of Southend. Aircraft need to form a stabilised approach prior to landing so will line up with the runway a number of miles out, the

		Dengie Peninsular is under the extended approach path for aircraft, this proposal will not change the way aircraft complete their final approach to LSA. Under the existing Section 106 agreement LSA is permitted 53,300 movements per annum. Separate proposals are being progressed to develop departure routes, currently aircraft that are departing from runway 05 (to the north east) take off and will route across the Dengie Peninsula prior to making a turn towards their onward destination. These departure routes have been consulted on.
13	Increased night flights over Dengie Hundred Peninsula	This proposal does not affect or seek to change the amount of night flights that LSA is permitted to operate. Under the existing Section 106 agreement, LSA is limited on the number and type of aircraft that can operate at night (2300-0630).
14	The increased volume of controlled airspace would complicate flight planning by confining aircraft not wishing to enter CAS to smaller areas	The majority of the airspace being proposed is over the sea, therefore it is not anticipated that there are a lot of flights that will be displaced or confined to smaller area as a result of these proposals. The airspace being proposed has a base of 3500ft therefore aircraft not wishing to enter can transit underneath. The majority of CTA 11 and part of CTA 10X sits over the D138 complex and therefore those portions of the airspace will only be available to use when the Danger Area is not active. Aircraft operating in those areas today would need to avoid the D138 complex when active.
15	This process should follow CAP1616 guidance and an options appraisal should have been presented for stakeholders to comment upon	The ACP for CTA10X and CTA 11 was submitted to the CAA in March 2017 before CAP 1616 was published. LSA has worked with the CAA extensively to ensure that the correct process is followed and that our stakeholders have been refreshed and have the ability to provide feedback on the proposals.
16	Existing agreements and procedures with stakeholders to be amended if required or new agreements created	LSA has a good relationship with its stakeholders and will work with them to update any existing agreements or procedures or create new ones if required.
17	If the airspace is approved implementation dates will need to be coordinated	Should the proposals be approved, LSA will work with the relevant stakeholders to ensure that the implementation date would be coordinated.

<p>18</p>	<p>Newly created air zones will create impact pathways from additional aircraft in these areas to bird species protected by nearby designated sites.</p>	<p>The proposed airspace that London Southend Airport (LSA) is looking to introduce is the same airspace that was presented during the consultation in 2013 but not implemented. The only change is that CTA 11 will only extend up to 5500ft rather than 8500ft as NATS now control the portion of airspace between 5500 – 8500ft. This change was introduced with the LAMP Phase 1A. The GEGMU holding pattern located to the South of Clacton-on-sea was implemented in 2015 and is published and available for use today.</p> <p>The airspace that is proposed, is to provide protection to those aircraft operating today. Currently, aircraft on approach to the airport using runway 23 (landing in a South Westerly direction) cannot complete a true Continuous Descent Approach (CDA) without dropping below controlled airspace (CAS). The proposed airspace would support CDA's which are the most efficient form of approach that prevent aircraft continually levelling off. When operating outside of CAS there is a chance that the aircraft will be given avoiding action if there is an unknown aircraft operating in the vicinity as appropriate deconfliction minima would have to be applied (5nm laterally or 3000ft vertically). If the aircraft chooses to remain within the current CAS structure to complete the approach, then they perform a less efficient approach remaining in CAS and then stepping down into LSA's CAS.</p>
<p>19</p>	<p>Concerns over displacement of smaller aircraft to lower flight heights or other areas.</p>	<p>Although aircraft could currently be operating in the existing uncontrolled part of the airspace, aircraft tend to be higher, as flying in these areas require long sections of flight over water. As a consequence, smaller general aviation aircraft will always tend to operate much closer to the land if they wish to operate at lower altitudes. This will not change with the introduction of the new airspace.</p> <p>The majority of these 2 pieces of airspace are over water. This generally discourages General Aviation (GA) from operating in these areas as most aircraft will not want to fly long distances over water, especially single engine aircraft. However, the base of the proposed airspace is at 3500ft, therefore aircraft can still continue to fly between 0-3499ft as they do today. Since the</p>



		<p>CAS at LSA has been introduced, ATC work hard to ensure that all requests are accepted, the current acceptance is over 99%. Stakeholders (ie pilots) can contact the CAA if they have any concerns over how LSA manages the airspace. LSA have not received any negative feedback or concerns from the CAA in relation to LSA management of the Class D airspace. LSA works with any airspace user wishing to access the airspace and has in the past made arrangements for access, where possible, for those aircraft without radios, for example. Stoke Microlight site to the south west of the airfield has its own designated local flying zone which was implemented with the CAS in 2015.</p>
20	<p>Concerns over the predicted number of movements and increase from original consultation.</p>	<p>LSA has always spoken publicly about its plans for development. Under a section 106 agreement the airport is limited to 53300 movements per annum. As required by the CAA, the 2013 consultation provided forecast traffic numbers for 5 years. The engagement for these 2 pieces of airspace provides forecast traffic numbers up to 2021, so the two forecasts will naturally be different.</p>
21	<p>Package of mitigations measures provided in original consultation should be updated based on increased traffic numbers.</p>	<p>The mitigation measures detailed in 2013 consultation are still applicable to these 2 proposed pieces of airspace.</p>
22	<p>Concerns about flight heights and stacking when the minimum is 3500ft.</p>	<p>The base of both pieces of airspace is 3500ft, however, aircraft will normally operate 500ft above the base to ensure required separation between different airspace is met, therefore the lowest height that aircraft would be operating routinely in this airspace is 4000ft, unless the aircraft is starting its descent into the next piece of existing airspace that has a lower base.</p> <p>The hold at GEGMU is already published for use today. The procedure is designed for aircraft to hold at 4000ft, 5000ft (outside CAS) and 6000ft (inside NATS CAS). Aircraft would not hold at different levels unless they are transitioning through the holding pattern ready to make an approach.</p> <p>Today, LSA use the 'SND' hold which is overhead the airfield at levels 2000ft and 3000ft. As well as aircraft operating at lower levels whilst holding, it also limits the height of departing aircraft, for example if there is an aircraft holding at 3000ft a</p>

		<p>departing aircraft would be limited to 2000ft until clear of the hold. By introducing airspace that affords protection to those aircraft operating in the GEGMU hold at levels 4000ft and 5000ft it will allow LSA to use this holding position routinely therefore improving the height at which aircraft hold, as well as holding aircraft over the sea, rather than overhead land and populated areas.</p>
23	<p>Commercial and private flights do not always comply with heights indicated</p>	<p>On occasions, aircraft will have to make changes to their planned flight path and this can be for a number of reasons, including weather, proximity of other air traffic or requests from adjacent airspace units to provide the aircraft to a certain point when joining the adjacent airspace but ultimately this comes down to maintaining safety. This is no different to what aircraft do today.</p>
24	<p>Consideration should be given to potential Bird Strikes particularly Brent Geese around Mersea Island.</p>	<p>The majority of Mersea Island is covered by CAS today (3500ft – 5500ft). Therefore, there will be no change to the way aircraft operate in that area with the introduction of the 2 proposed pieces of airspace. Those aircraft which do not wish to enter CAS will continue to operate up to the base (3499ft) and those aircraft who wish to operate in CAS will continue to do so as they do today.</p> <p>There is no evidence to suggest that the changes proposed would have any impact on the bird strike risk to aircraft. LSA have received no reported birdstrikes in the areas of the proposed change in at least the last 3 years and we are not expecting this to change even with an increased volume of traffic.</p> <p>The existing air navigation advice to pilots, given in the UKAIP with respect to bird concentrations, will continue to apply and is not affected by this proposal.</p>
25	<p>LSA should consider / provide the following</p> <ul style="list-style-type: none"> <li>• Changes to the Outer Thames SPA since 2013</li> <li>• Habitats Regulation Assessment (HRA)</li> <li>• In Combination Assessment of other plans and projects and changes to surface traffic and aircraft traffic</li> </ul>	<p>LSA will seek further guidance from the CAA on these points.</p>

## **Conclusions**

The engagement has been carried out in accordance with the requirements set by the CAA. LSA has targeted a cross section of industry, environmental and community consultees to ensure a wide and varied number of stakeholders have been made aware and have an opportunity to provide feedback on the proposals.

Although the response rate was not as high as LSA hoped (12.4%), a wide range of responses were received from different stakeholder groups. The number of page views on the website (445), indicates that a wide audience reviewed the proposals or were aware of the proposals but chose not to provide feedback.

LSA has found no issues have arisen which would materially affect the introduction of the 2 pieces of controlled airspace to provide for the safe and efficient conduct of aircraft and for the safe operation of other aircraft in the vicinity.

LSA concludes, therefore that given the safety responsibilities and accountabilities placed upon it under the Air Navigation Order and EC Regulations 550/2004 and 1035/2011 there are no material issues arising from objections to the proposal that would justify withdrawal of the proposal.

## **What happens next?**

It is planned that LSA will submit the Addendum to the ACP, submitted in March 2017, by 31<sup>st</sup> January 2020. The CAA will then thoroughly review the documentation submitted and will make a decision on whether to approve the airspace that is being requested.

If approved, the airspace could be implemented in Autumn 2020 (AIRAC 10/2020)