

# Leeds East Airport Airspace Change: Consultation Report

12 August 2021

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# 1. Introduction

## 1.1. Overview

This document provides an overview of the comments received as part of Leeds East Airport's (LEA) targeted stakeholder consultation on the introduction of RNP approaches and LEA's responses. It is supplemented by Appendix A which provides the consultation responses details and references to LEA's answers.

## 1.2. Background

LEA is seeking to introduce instrument approach procedures (IAP) to two of its runways (06/24). These approaches are intended to support the development of the airport into a Business and Executive Aviation hub for North Yorkshire, permitting safe use of the airport under a wider range of weather conditions. The IAPs will only be used for runways 06 and 24 with conditions and/or restrictions of use applied.

Further details on the change are provided in the consultation document, available [here](#).

The initial application for instrument flight procedures lodged with the CAA was undertaken in 2016 and was followed by two consultation processes in 2017, which was incomplete, and 2019.

Within the 2019 consultation, feedback was received from the gliding community about possible conflicts between gliders and aircraft on approach or conducting a missed approach in their vicinity. In order to mitigate these concerns, changes were made to the routes followed by aircraft should they not be able to land following an instrument approach (missed approach procedures or 'MAPs').

Following these comments, changes were made to the proposal and a new consultation was launched. Changes to the proposal from 2019 (reflected in the consultation just gone) are as follows:

- The Initial approach fix (waypoint) over Full Sutton Airfield was removed,
- All holds were removed, and
- Separate MAPs were introduced for smaller category A/B & larger category C/D aircraft to maximise separation between the MAPs and local flying sites where possible.

Further details on the consultation process are provided in section 2.

## 1.3. Document structure

The structure and contents of the remainder of the document are as follows:

- Section 2: Provides a summary of the consultation process, covering the stakeholders consulted, the types of response requested e.g. support/objection etc., and consultation timeline.
- Section 3: Provides a breakdown of the number of responses into stakeholder group and stance.
- Section 4: Outlines the themes of support and those for the proposal. This section also provides LEA's response to the themes against the proposal.
- Section 5: Provides the conclusions and next steps.
- Annex A: Summarises each objection and gives LEA's response to each.

## 2. Consultation process

### 2.1. Overview

The consultation period commenced on the 18 February 2021 and ran for 12 weeks to 13 May 2021. The primary method of communication with consultees was via email. The consultees were a combination of (1) a list of aviation and non-aviation stakeholders – agreed with the CAA – and (2) those who had engaged with previous consultations.

The main stakeholder groups consulted are presented in Table 1. A full distribution list, of over 340 consultees, was provided to the CAA.

Aviation stakeholders	Non-aviation stakeholders
Airports, Military airbases, airfields and private air strips	Parish and District Councils
Helicopter bases	Parliamentary Constituencies (MPs)
Helipads at hotels and racecourses	Additional respondents engaged from previous consultations
Representative aviation bodies AOPA, BGA, LAA	
Other aviation organisations and institutions e.g. members of the NATMAC committee, NATS, UK Flight Safety Committee, AUKFISO	

Table 1: Consulted stakeholders

All consultation material was made available on the Leeds East website, with LEA offering to provide copies by post (printed) to people that wanted it. Parish councils were encouraged to make consultation materials easily accessible for those without internet access.

Consultees were encouraged to respond by email, with a postal address also provided for consultees who wished to respond via post.

Consultees were requested to provide one of the following responses:

1. Support – in favour of the proposal
2. No comment – read the document and have nothing to add
3. No objection – neither in favour or not in favour
4. Object – not in favour, with reasoning provided for analytical purposes

Consultees were also able to submit queries. LEA prepared a Q&A document from the queries received. A first version was distributed at the end of March 2021, with an updated second version – taking into consideration further queries raised following the publication of the first version – distributed in April 2021. The Q&A document is provided separately.

A detailed timeline of the consultation is provided in section 2.2.

## 2.2. Timeline of consultation

There was a total of six (6) separate communications distributed to consultees and three (3) virtual workshops held. The timeline and summary of the communications and workshops are provided in Table 2.

Date	Purpose/contents
<b>18 Feb 21</b>	Start of consultation.
<b>18 Feb 21</b>	<p>Communication #1: Notification of start of consultation.</p> <p>Contained timeline for responses, advert for initial workshop to be held on 14 April, and where to find the consultation document.</p>
<b>24 Feb 21</b>	<p>Communication #2: Clarification</p> <p>Contained V2.1 of the consultation document that corrected an error regarding announcement to traffic by LEA on radio frequencies.</p>
<b>25 Mar 21</b>	<p>Communication #3: First reminder email.</p> <p>Contained joining instructions for the first workshop on 13 May and first Q&amp;A document. The Q&amp;A document provided responses to a number of queries received in the first few weeks of the consultation period.</p>
<b>14 Apr 21</b>	<p>Virtual Workshop #1</p> <p>LEA described the change and took feedback/questions on it. The first section of the meeting was on the overall change and impact on non-aviation stakeholders. The second part focussed on other airspace users</p>
<b>20 Apr 21</b>	<p>Communication #4: Second reminder email.</p> <p>Contained joining instructions for two additional workshops – as requested by aviation stakeholders at workshop #1 – and updated Q&amp;A document following further queries.</p> <p>The additional workshops covered the following:</p> <p>Workshop #2: Discussion on safety risks and mitigations</p> <p>Workshop #3: Discussion on IAPs</p>
<b>21 Apr 21</b>	<p>Virtual Workshop #2</p> <p>As above</p>
<b>29 Apr 21</b>	<p>Virtual Workshop #3</p> <p>As above</p>
<b>30 Apr 21</b>	<p>Communication #5: Final reminder</p> <p>Contained a reminder of the upcoming consultation deadline and draft Letter of Agreement (LoA) with York Gliding Club at request of glider clubs.</p>
<b>13 May 21</b>	Consultation ends
<b>17 May 21</b>	Communication #6: Completion

Date	Purpose/contents
	Notified consultees that the consultation period had closed

*Table 2: Consultation timeline*

### 3. Response summary

This section provides a breakdown of the responses received, including numbers per stakeholder group and response stance. A summary of the main themes in support and objection are provided in section 4.

#### 3.1. Overview

There was a total of 70 responses to the consultation, all of which were submitted via email. 12 of these responses were received after the consultation deadline, but have been included in the analysis. The following sections provide a further breakdown of the responses.

#### 3.2. Responses by stakeholder group

The breakdown of responses by stakeholder group is presented in Figure 1. The largest group to respond were individuals, which represent 36% of responses. The individuals are made up of almost all individual residents, with one councillor also responding. Parish Councils were the next largest group to respond, with their 18 responses making up 26% of responses. Representative aviation bodies made up 19% of responses; this group includes local gliding clubs and national aviation organisations covering a variety of aviation interests.

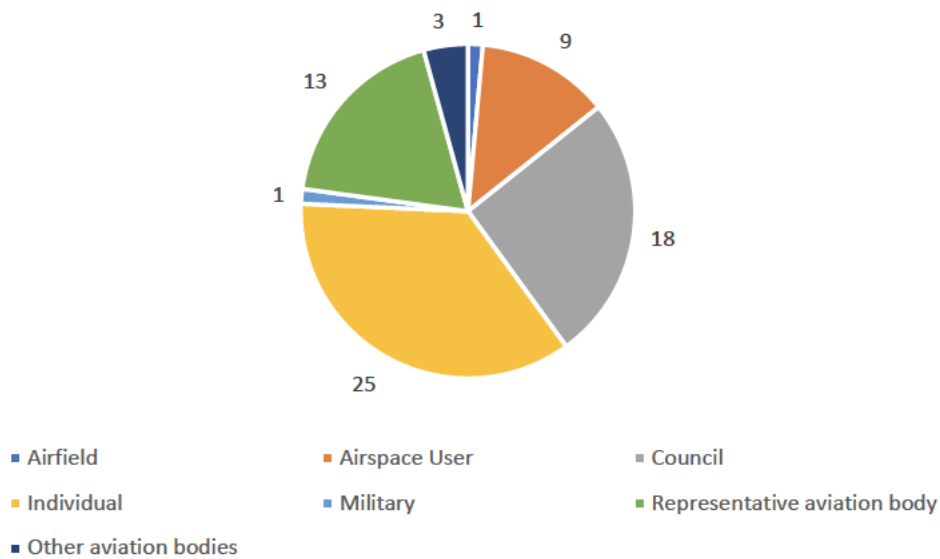


Figure 1: Responses by stakeholder group

#### 3.3. Responses by stance

The breakdown of responses by stance is presented in Figure 2. Of the 70 responses, 29 objected to the introduction of the IAPs, representing 43% of responses. 14 responses were in support of the proposals, whilst 10 responses provided either no comment or no objection. There was a single response which concluded they were too far away to be impacted and did not believe they were applicable to be included in the consultation. There were 14 responses which provided a query or general comment on the proposal i.e. these include statements declaring no comment or questions and comments on the proposal without a specific statement of support or objection.

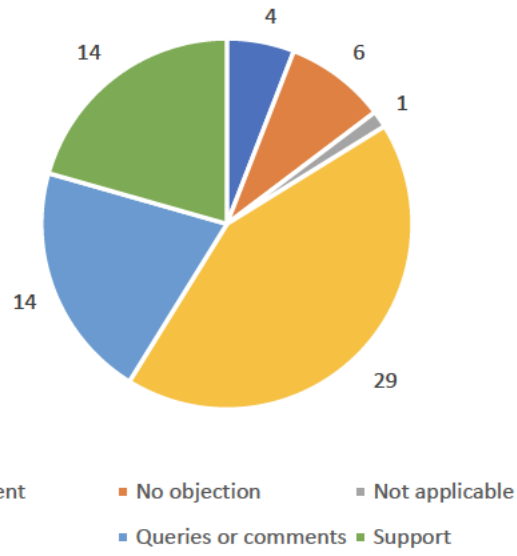


Figure 2: Responses by stance



## 4. Response themes

It was found that several common themes emerged when analysing the responses, both in support of, and against, the proposals. This section provides a summary of these themes.

LEA have provided a commentary in response to the objections identified against the proposal. Commentary on the main objection themes are provided in section 4.2, whilst LEA commentary on each individual response is provided in Annex A.

### 4.1. Themes of support

Of the 14 respondents who supported the proposal, 2 explicitly mentioned that they live directly under the proposed flight paths. 8 respondents provided a single statement of their support; the remaining 6 respondents, representing 43% of the support responses, provided explicit reasons for their support. The reasons for supporting the proposals covered an increase in safety, an economic benefit to the surrounding community, and LEA's contribution to improving national infrastructure. These reasons are expanded in the following sections.

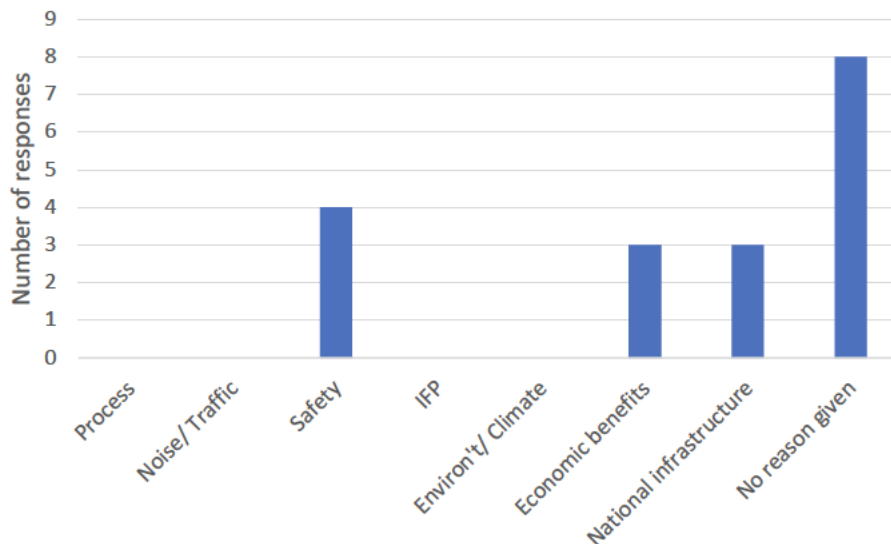


Figure 3: Themes of support

#### 4.1.1. Safety improvements

Four of the 14 respondents explicitly mentioned an improvement in safety. Two respondents referred to the increased predictability of an aircraft's flight path, with one of these respondents highlighting that the procedures will be published and documented. One respondent outlined that the introduction of IAPs would enhance the aids available and hence better support pilots on their approach, particularly in poor weather and low visibility.

#### 4.1.2. Economic benefits

Three of the 14 respondents explicitly mentioned the economic benefits that the IAPs would bring to the local community. One reason for the economic benefit was the ability to fly into the airport during periods of low visibility; this provides greater predictability and flight planning for those flying in for business and hence brings investment to the area. One response highlighted that an

increase in commercial air operations that would result from the introduction of the IAPs at Leeds East had the potential to provide an increase in jobs and hence local prosperity.

#### 4.1.3. National infrastructure

Three of the 14 respondents explicitly mentioned LEA’s contribution to improving national infrastructure as a reason for support. One response referred to a government objective for the country to ‘become the best place in the world for general aviation’; it stated that the UK has less than 20% of the operational LPV procedures of France and significantly less than the USA – for the UK to improve and strengthen general aviation in light of the country’s inclement weather, instrument approaches are a necessary investment. Another respondent highlighted the better connections that LEA has than larger airports in the region, whilst also having the space to expand and facing less topographical challenges than Leeds Bradford.

#### 4.2. Issues raised in the objections

This section provides a summary of the main issues raised in the objections that were received and LEA’s response to them.

The issue of increase in noise and traffic was the most raised issue, with 19 of 29 objections raising it. This was just ahead of a perceived inadequacy of the consultation process, which was raised by 18 of the 29 who objected. Other reasons for objecting to the process related to the safety of future operations in the vicinity of LEA, the appropriateness of the procedures themselves, impact on the environment and climate change, and potential impact on the local economy.

A breakdown of the issues raised is presented in Figure 4. The issues are further explained in the following subsections, alongside LEA’s responses. This is supplemented by Appendix A, which provides the details of the objections and LEA responses.

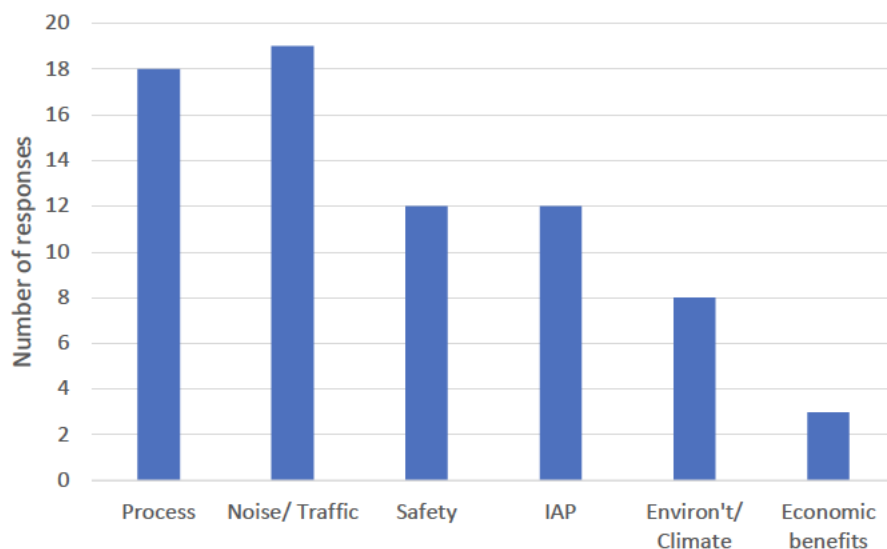


Figure 4: Issues raised

#### 4.2.1. Process

A main theme of the objections was that the process was inadequate. Several respondents complained that they were unaware of the consultation until it was too late and that the number of workshops held (one workshop that was initially advertised, with two more subsequently arranged) was inadequate for the number of consultees.

Furthermore, questions were raised as to why CAP 725 was being used as opposed to CAP 1616, which has superseded CAP 725 in recent years.

Three respondents outlined Sherburn's similar proposal for the introduction of RNAV procedures and, considering the overlapping nature of the procedures, stated that there should be a single ACP encapsulating both LEA and Sherburn proposals. They suggested that the separation of the proposals, as is currently the case, cannot enable the interdependencies to be properly assessed.

Finally, some objections were raised regarding a lack of transparency due to a full safety case not being presented as part of the consultation process. The respondents stated they did not have faith in the process and that there was not enough information to support the proposal.

#### *LEA response:*

##### Consultation Distribution

As part of the consultation strategy, impacted aviation and non-aviation stakeholders were identified and included as part of the consultation distribution. The consultation strategy and distribution list were reviewed by the UK CAA before consultation. The distribution list included over 340 consultees.

The distribution list covered national and local gliding and light aircraft associations, Parish Councils, District Councils and Members of Parliament (MPs). Emails were used as the primary means of consultation. Therefore, leaflets and flyers were not distributed to every resident, although all communication and intentions were passed through Parish Councils.

Further to this, all members of NATMAC (the National Air Traffic Management Advisory Committee) were individually included as consultees, which includes BGA, BMAA and LAA.

An initial email was sent to each consultee at the start of the consultation period, followed by four reminders. These communications advertised the consultation material, which has remained on LEA's website and Facebook page throughout the consultation period.

##### LEA and Sherburn proposals

The Leeds East (LEA) and Sherburn Aero Club (SAC) consultations have been conducted separately on advice from the CAA.

Co-ordinations have been implemented between the two airports via a Letter of Agreement to ensure their safe operations and deconflict the two approach paths. There is a slot system, that ensures two aircraft will not simultaneously use both LEA and SAC approach paths. This is the only interaction between the two ACP applications.

Furthermore, the CAA is aware of the proximity of the airfields to one another and will be assessing each ACP in light of the other.

## Workshops

The initial workshop was widely advertised (to more than 300 consultees) but a fairly small number of people – approximately 20 – attended and there were no requests from people that wanted a workshop but could not make the date. Only one consultee joined that did not represent a gliding club and this was a parish council representative.

The two follow-on workshops were run to address the technical concerns of the gliding clubs. If LEA had received requests from other stakeholders it would have set up other workshops.

## Consultation process

The consultation has followed the requirements of the CAP725 process. LEA also believes that the consultation process has been run in a meaningful manner and according to government principles on public consultation. See: <https://www.gov.uk/government/publications/consultation-principles-guidance>

The alignment with government principles covers:

- *Consultations should be clear and concise*: The consultation document was written in plain English and was clear on the proposal being put forward and the questions being asked.
- *Consultations should have a purpose*: The consultation purpose was outlined in the introduction of the consultation document
- *Consultations should be informative*: The consultation document provided a summary of the proposed changes as well as the expected impacts on local communities and aviation stakeholders. Three workshops were held to discuss the proposals, including specific workshops to discuss the safety risks and instrument approach procedures themselves.
- *Consultations are only part of a process of engagement*: The recent public consultation has followed previous engagement with local gliding clubs/ aviation stakeholders and have included adjustments to procedures following feedback.
- *Consultations should last for a proportionate amount of time*: The consultation lasted for 12 weeks, consistent with CAA guidelines. And late responses were accepted despite being beyond the published deadline.
- *Consultations should be targeted*: The consultation material was targeted at local communities and representatives e.g. Parish Councils and MPs, as well as local and national aviation stakeholders. It was also made available online for anyone to download.
- *Consultations should take account of the groups being consulted*: Consultation material was written in a clear way for non-aviation stakeholders as well as more technical consultees. 12 weeks provided adequate time for all parties to provide responses. Workshops were held and a regularly updated Q&A document was produced.
- *Consultations should be agreed before publication*: The consultation strategy and consultation material were reviewed by the CAA before the consultation.
- *Consultation should facilitate scrutiny*: The workshops allowed consultees to scrutinise the proposals. Email questions were responded to in the Q&A document. This consultation report analyses the responses and contains LEA's response.

- *Government responses to consultations should be published in a timely fashion:* Although not a government consultation, the report has been published within 12 weeks of the consultation closing.

- *Consultation exercises should not generally be launched during local or national election periods:* This is not applicable to an airspace change.

#### CAP 725

CAP 725 has been superseded by CAP 1616, but it was the applicable process when the airspace change process was initiated and, in discussion with the CAA, it was agreed that CAP 725 should continue to be used despite the new process being available. It has not been 'discredited' as described by some consultees.

#### *4.2.2. Noise / Traffic*

The main concerns were related to the increase in aircraft numbers expected at LEA and the additional noise that would create for local residents, particularly with respect to the larger aircraft – Category C and D. Five separate Parish Councils raised objections with respect to noise and aircraft numbers, with one respondent stating that the increase of one movement per hour proposed by LEA would represent a significant increase in aircraft and hence noise.

Considering the increase in aircraft proposed by LEA, 11 respondents stated that additional planning permission should be sought from Selby local council. Two respondents suggested that Selby's former Chief Planning Officer had the view that "intensification" of the airfield would require further planning permission. Furthermore, four respondents highlighted a 3,500-property settlement proposal at Selby as an additional reason for requiring further planning permission.

Nine respondents objected over their concern that the airfield will be used 24 hours a day, raising particular concern over operations during the night even though this is not the case.

#### *LEA response:*

##### Increase in noise and pollution

Although an increase in movements is predicted at LEA, it is not expected to provide a significant increase in noise disturbance. The increase will be no more than 1 arrival per hour and (because of sharing with Sherburn) it is expected to be 8 arrivals per day (16 movements).

It is expected that movements of the largest and noisiest aircraft (CAT C&D) will only be around 1 movement every 4 days.

Furthermore, the increase of movements is anticipated to be spread over several years given the impacts of the pandemic. The estimates given in the consultation report are based on a 2019 baseline and LEA do not expect these activity levels to return for a number of years.

Some respondents commented on a recent increase in traffic. LEA has seen a partial recovery following COVID lockdowns but this is not related to the proposed ACP.

##### Levels of noise

Some respondents asked for information on actual measured noise levels. The level of aircraft noise heard on the ground depends on numerous factors outside of the airport's control, for example weather conditions and pilot behaviour. The only method for measuring aircraft noise would be to

install noise monitors at several locations near to the airport. However, this solution is not feasible for the number of aircraft movements in and out of LEA.

#### Planning permission and Selby

Any other permissions required to increase airport movements are determined by the local council if deemed necessary.

Other impacts, such as changes in road traffic caused by additional movements, are reviewed by LEA in light of the overall benefits to the community that the introduction of the IAPs would bring.

The settlement at Selby is at a planning stage and has not been approved. The ACP is restricted to considering the impact of approved or actual developments.

#### Operating hours

There is no plan to regularly operate during the night, albeit there may be rare occasions when there will be limited movements late and early in the day. The airport operating hours are 01 Apr - 31 Oct 0730-1700, 01 Nov - 31 Mar 0830-1630 as described in the AIP. Extensions are by arrangement.

#### Ryther

Ryther is about 1.5km from the end of the runway for arrivals to RWY 24. All arrivals (whether current arrivals or the ones from flying new procedure) will take a similar path here just north of Ryther. Departures will also generally climb straight before turning. Again, the aircraft flying the new procedures will pass by Ryther on a similar track to the existing aircraft. The airfield has been active for many years, including as an RAF Station dating back to the second world war.

#### 4.2.3. *Safety*

There were several different concerns raised with respect to safety, particularly from the local gliding community and a local airfield. The main concern relates to the perceived high risk of mid-air collision that the use of an IAP in all weather conditions would create. This itself is in light of the general aviation activity conducted in the vicinity of the approach paths; four separate respondents highlighted the Area of Intense Aerial Activity (AIAA) and/or “intense gliding activity” (as represented on VFR navigation charts) in the Vale of York as main factors for the suggested high risk. Other specific areas were highlighted as having an increased risk, including the area north of Appleton Roebuck and the Upton Corridor (a route used by some gliders when particular weather conditions permit).

One safety risk relates to the concern that pilots flying by their instruments would have their head down and therefore not have a sufficient lookout. It was outlined that this could significantly increase risk. Furthermore, it was outlined that the risk of mid-air collision particularly increases when an aircraft on an approach path transits from cloud to visual conditions i.e. descending into an area of intense gliding activity without having adequate visibility prior to entering visual conditions.

Other safety concerns raised included in the following:

- Although it has been proposed that the missed approach paths are only expected to be flown 1% of the time, due to the proximity of the missed approach paths with respect to

gliding club bases, the gliders would need to assume that each aircraft could fly the missed approach and hence would not be able to fly in the airspace for risk of collision.

- IFR flights in Class G airspace.
- Use of LNAV procedure, which was suggested was not appropriate to be used in the North of England
- Not all pilots being aware of the use of instrument approach procedure prior to flying.
- Due to the overlapping nature of LEA and SAC proposed IAP tracks, pilots not knowing whether aircraft are on the LEA or SAC approach path, and hence misunderstanding the pilots' intentions.
- A concern that the airspace change might be approved without Letters of Agreement with all local airspace users being agreed.

### *LEA response:*

#### Safety

LEA has undertaken a safety assessment and there are a set of procedures and mitigations which LEA believes are sufficient to manage the risk to other airspace users. The safety assessment is a qualitative analysis, the approach of which has been discussed and agreed with the CAA, and is based on both historical analysis of risk within the Vale of York, expected traffic levels going forwards, and mitigations proposed.

The mitigations, which LEA believe brings the risk to as low as reasonably practicable (ALARP), include the following:

- use of slot systems, which restricts both the overall number of movements into the airport and avoids simultaneous aircraft on approach to LEA.
- mandatory visual lookout in VMC
- restrictions on LEA's movements i.e. there will be no CAT C and D training, and CAT C and D will only be used following coordination with the local aviation stakeholders
- communication channels to make other airspace users aware of the use of the IAPs
- pilot briefings, including information on local traffic, particularly gliding operations.

Furthermore, aircraft transiting the area would be expected to use normal procedures to plan their trip accordingly, and if in the vicinity of LEA call the airport to obtain local traffic information. Once established in VMC, pilots will be expected to use normal see and avoid techniques

Following the workshops, a traffic study is being conducted to better understand the traffic levels around LEA. This will be provided as an input to the safety assessment. LEA will review the safety assessment in the light of the traffic study. Additional mitigations may also be agreed with local clubs if additional LoAs are defined.

As LEA explained during the consultation process, it will not make public its safety assessment but that the assessment will be reviewed and assessed by the CAA.

#### Flying in Class G airspace

A general principle of Class G airspace is that it is open to all aircraft types and any user can fly without restriction as long as they adhere to the relevant rules and regulations. There is no air

traffic control and it is the responsibility of all pilots to avoid and manage separation from other aircraft.

Regardless of this or any other ACP seeking to introduce RNP IAPs into existing Class G airspace, the Air Navigation Order permits IFR flights in such airspace and has done for many years without further regulatory intervention.

Mitigations have been proposed to reduce the risk within the airspace, which include mandatory lookouts for all flights in VMC and warnings related to glider activity being provided in the Pilot Brief.

Furthermore, the introduction of instrument approach procedures provides other users greater predictability about where aircraft will be, thereby increasing safety.

Following the concerns raised in the consultation an additional traffic study has been conducted by the airport to gather more information on risks.

Note that the new procedures also offer an increase in some aspects of safety because they offer greater predictability of operations.

#### Denied access to Class G

LEA cannot, nor does it intend to, try to restrict access to other airspace users to the local airspace. Class G airspace is, and should, be available for all airspace users. The main aim of the mitigations is to ensure effective communication and coordination thereby ensuring each party is aware of the others' movements.

The Rules of the Air have specific collision avoidance requirements and all pilots are required to follow them.

The slot times are not airspace reservations, they are there to restrict the number of inbound instrument approaches to LEA and at the same time provide other airspace users greater predictability of inbound traffic.

Class G airspace provides no restrictions on who can fly and when. Through appropriate mitigations, which LEA believe to have provided, LEA believe the risk of MAC to be low and therefore expect all airspace users to be able to continue their operations.

#### LoAs

LEA has applied significant resources to draft LoA's with fair compromise but it has not agreed LoAs with all relevant airspace user groups.

At the time of writing, draft LoAs are agreed with Leeds Bradford Airport, Doncaster Sheffield Airport, Sherburn Aero Club, Yorkshire Air Ambulance, National Police Air Service Yorkshire and Garforth airfield. Elvington Airfield and LEA are in discussions to mitigate their respective operations.

LEA continues to offer resources to further agree LoA's with all stakeholders, however the safety case provides mitigation to reduce risks to ALARP.

All the draft LoAs will be submitted to the CAA with the ACP application.



## AIAA

LEA recognise that within the Vale of York an area of 'Intense Gliding Activity' is highlighted within VFR navigation charts, however taking consideration of the traffic levels (to be further analysed through a traffic study) and mitigations to be put in place, the risk is deemed ALARP.

Furthermore, the Area of Intense Aerial Activity noted within the AIP is related to historic military operations conducted from Church Fenton, RAF Leeming, RAF Linton on Ouse, RAF Dishforth, RAF Topcliffe. Many of these bases are now closed or have reduced levels of activity.

Nevertheless, LEA believes the level of gliding activity in the vicinity of the IAP approach paths is manageable with respect to safety when taking into consideration the mitigations proposed.

### Types of procedure

The following approaches are proposed for the new IAP, all of which are approved by ICAO and the CAA: LNAV, LNAV/VNAV and LPV. LEA is aware that LPV approaches may be unavailable because, post-Brexit, the UK is no longer eligible for the EGNOS Safety of Life service but it will implement LPV if this situation changes.

### CAT C&D operations

As per the consultation document, Category C & D movements will not be operated without coordination and agreement with all local aviation stakeholders.

It will be a rare event for a CAT C&D aircraft to fly a missed approach. CAT C&D will not conduct training on the new procedures. Also, due to the dependency on wind direction, the MAPs will not be used at the same runway end each time

#### *4.2.4. Instrument Approach Procedure (IAP) design*

The main objections related to the IAP centred on the concern that the designs had not given due consideration of the local gliding activity. Four respondents questioned why other routes could not be used, with one respondent illustrating alternative route options. One respondent made specific reference to the GAINS project (a European R&D project), which used advanced navigation techniques to overcome limitations in typical procedure design, and asked why the outputs of the project hadn't been fully incorporated into the designs.

Several respondents questioned why the procedures were not apparently based on standard 3° glide path.

#### *LEA response:*

### IAP

The designs have been developed by a CAA Approved Procedure Design Organisation to comply with the latest Edition of: ICAO DOC8168 Aircraft Operations Vol II Construction of Visual and Instrument Flight Procedures, Seventh Ed 2020, and relevant State guidance and criteria. They have been designed to minimise the impact as far as practicable for all stakeholders.

The designs were developed to adhere as closely as practicable to the suggested PANS OPS standard GNSS T or Y bar concept cognisant of such guidance in CAP1122 which was in force during initial development.

The IAPs have not made use of the advanced navigation techniques used in the European GAINS project because aircraft arriving at LEA will not generally be equipped with suitable equipment for these techniques. Examples of this include Radius-to-Fix (RF) legs and very high navigation accuracy (RNP) requirements.

Furthermore, non-standard procedures (eg course reversal for missed approach) would only be used for obstacle avoidance, and the CAA has told LEA that it would not consider them appropriate for airspace management and not desirable for a typical General Aviation approach procedure.

#### Recommended vertical profile

The final approaches are based on a standard vertical profile of 3°, which aircraft will be expected to adhere to. There are some waypoints along the approach path which have a corresponding 'not below' altitude. These are not to be read as the optimum flight profile and does not mean aircraft will always be at that height.

The designs provided in the consultation documentation are graphical representations of the procedure only and not meant as a chart for AIP publication. The charts were accurate but indicative. The final charts will be compliant with UK AIP standards

Note that the procedures are a standard PANS Ops design, and as such noise will not be made worse by the procedure design.

#### *4.2.5. Environment / Climate change*

Five respondents objected on the grounds that increased aircraft to LEA would have an adverse impact on climate change and questioned how the expansion of operations was in line with government climate change targets. Two respondents questioned whether a full environment impact assessment had been conducted and highlighted increases in carbon emissions from private jets over the previous 15 years.

#### *LEA response:*

An environmental impact assessment has not been conducted and is outside the scope of the ACP application.

However, LEA is a very small airport in national terms and believes that its additional movements would not prevent government meeting national climate objectives. Nevertheless, LEA, and its local aircraft operators, will of course be subject to government climate policies.

#### 4.2.6. *Economic benefits*

Three respondents raised concerns that the economic benefits the implementation IAPs would bring would not outweigh the negatives i.e. noise and pollution. Two respondents questioned whether an economic impact assessment had been conducted.

##### *LEA response:*

LEA has not produced a public economic evaluation but believes that the introduction of IAPs will bring an overall economic benefit both to the airport and local area.

## 5. Conclusions and next steps

This report has summarised the response to the LEA airspace change consultation. The consultation lasted for 12 weeks and the consultation materials were sent to over 300 consultees. Seventy responses were received of which:

- 29 objected to the introduction of the IAPs,
- 14 were in support of the proposals,
- 10 responses provided either no comment or no objection.

The themes of support and objection have been summarised in this document, as well as LEA's response.

As a response to some of the issues raised:

- LEA will undertake a traffic study to better understand the traffic levels around LEA. This will be an input to the safety assessment which will be updated as appropriate.
- LEA will invite local airspace users to propose wordings for the notices on the final charts.
- LEA continues to offer resources to agree LoAs with local airspace users.

## A. Summary of issues raised in the objections

This section contains a summary of the issues raised in the objections to the consultation as well as the responses or references to the main text where the response is given.

REF	Organisation	Key extracts from consultation response	Additional detail
05	N/A	<p>EGCM Runway 24 GNSS RNP - minimum altitude of 2300 at CM24I is inefficient for noise, should be at 3000 on a 3 degree glide slope.</p> <p>There is also a safety implication. A light aircraft transiting from East of York to the South will be above 2000' to avoid the various ATZ's in that area. In conditions of poor visibility, haze, winter sun etc a light aircraft is likely to be at 2300'/MSA, exactly at the altitude of an aircraft on approach to EGCM who will be on the GNSS approach because of poor visibility</p>	<p>Minimum altitudes are published to ensure aircraft remain the required vertical distance from terrain and obstacles and are not a recommended flight profile.</p> <p>It is expected that pilots would brief themselves of local operations before any flight, and therefore should be aware of any traffic using the IAP. It is possible to call LEA to understand traffic expectations.</p> <p>Topographical charts will have feathered arrows</p>
		<p>Similar considerations exists for the RWY06 approach. The consultation document proposed approach plate shows a not below altitude at CM06I of 2200'. CM06I is at 11NM from the MAPt, commensurate with a 3° angle of approach an aircraft would be expected to be at 3500'. However, an aircraft on approach to EGNM RWY32 would be 4000' descending on their ILS, so clearly a much lower level for an approach to EGCM RWY06 must be used.</p>	<p>There is an agreement and LoA with EGCM which provides coordination between approaching aircraft at each airfield.</p>
		<p>An aircraft on approach to EGCM RWY06 should be receiving a radar service from EGNM. An aircraft in IMC cannot/should not descend below MSA which from the EGCM chart in that sector is 3500'. However, the EGNM ATC Surveillance Minimum Chart (attached) depicts that whilst receiving a radar service from EGNM, aircraft may descend at the direction of EGNM ATC to 2200' in that sector. Have arrangements have been made with EGNM to provide radar service to aircraft inbound to EGCM RWY06?</p> <p>Any light aircraft transiting between Leeds and Castleford at the base of EGNM's CTA at</p>	<p>There is an LoA in place between LBA and LEA to coordinate between the two airports (note that arrivals will be using TAA, not MSA)</p>

REF	Organisation	Key extracts from consultation response	Additional detail
		2500', is likely to remain as high as possible without entering the CTA because of terrain. If an aircraft on approach to EGCM GNSS 06 were at 2300', they would be in proximity to any VFR traffic.	
06	British Gliding Association	We are disappointed that the BGA has not been directly engaged or consulted by LEA. Had the BGA been engaged, we would have helped to facilitate early local engagement and issue-resolution with gliding clubs	See Section 4.2.1 (Process)  LEA received comments from the BGA CEO and were informed by gliding clubs that they were coordinating with the BGA.
		The airspace described in the LEA consultation is class G. In the UK, class G airspace is uncontrolled. This means there must be no restrictions on which aircraft can enter it, what equipment the aircraft must carry, or which routes should be taken by aircraft.	See Section 4.2.3 (Safety)
		There is no safety case described within the consultation document. This lack of transparency is a hallmark of the now discredited CAP725 process. The absence of safety related detail, or even an unpublished description described in confidence to aviation stakeholders, results in lack of trust. That is in large part because without the information, it is not possible for consultees to understand the level of risk or its impact upon their safety.	See Section 4.2.1 (Process)
		The consultation document does not describe how LEA will mitigate any increased MAC risk where GNSS approach traffic may operate under IFR while other, non-LEA traffic, is flying under VFR. The LEA proposal identifies a mid-air collision hazard and notes that 'a safety case has been developed by the airport. This has given it confidence that the introduction of RNP approach procedures will be safe and that risks have been reduced by the application of mitigating operating procedures to an acceptable level'. The only stated mitigation is the use of 'one hour arrival slots (shared with Sherburn-In-Elmet) for aircraft using the RNP approach to reduce the risk of a mid-air collision.'	See Section 4.2.3 (Safety)
		Letters of Agreement (LoA) are an essential component of shared airspace where procedures have not been designed to avoid impacting on others. Letters of agreement must be developed collaboratively by those involved; an LoA cannot be drafted by a sponsor, agreed by CAA and then imposed. Where numerous stakeholders are impacted, it is important to ensure that each LoA does not introduce issues for others.	See Section 4.2.1 (Process)

REF	Organisation	Key extracts from consultation response	Additional detail
		The BGA understands that because safety concerns have not been satisfied, LEA has not yet been able to agree LoA's with several gliding stakeholder airfields.	
07	Yorkshire Gliding Club	Seeking to introduce new instrument approaches without explaining how they are to manage deconfliction in an area of Class G airspace that is already heavily used by GA and other traffic and which is a major cross-country route for glider pilots not just from Sutton Bank and the other local clubs but by clubs from all over the country	See Section 4.2.3 (Safety)
		as it has become clear from conversations with LEA that their intention is to use these approaches in all weather conditions, to use them for training purposes and potentially for aircraft up to Cat D, then the impact has become severe both in terms of risk and the potential harm to our operations and business.	See Section 4.2.3 (Safety)
		LEA should explain how it intends to manage deconfliction between the new traffic using its proposed IAPs and MAPs and the regular and heavy traffic that will already be in the area. That mitigation should not be predicated on restricting existing airspace users and passing the safety issue to them for mitigation.	See Section 4.2.3 (Safety)
		LEA have told us that they consider the risk of catastrophe and the overall risk to be "low" but we have had no visibility of how that has been arrived at either in the proposal as presented, in answers to our queries or at the two stakeholder workshops. The discredited CAP725 process being followed by LEA compounds this problem but we can see no reason why LEA would not want to share the principles of their safety case. From our perspective the introduction of these routes into an already congested area without ATS or radar surveillance is extremely high	See Section 4.2.1 (Process) and 4.2.3 (Safety)
		We know from our membership of the Yorkshire Local Airspace Infringement Team and the reports that we receive in that forum that there are human factors risks associated transitioning between IFR and VFR and those risks will certainly be present if the proposed IAPs are introduced. We are concerned that our pilots will be faced with IFR traffic following the IAPs emerging from cloud with the pilot's head still "in the cockpit" into an area of heavy VFR traffic. Despite repeated requests we have not been told how LEA propose to manage deconfliction in these circumstances.	See Section 4.2.3 (Safety)
08	Rufforth East Airfield	The approach to rwy 24 has an IAF at not below 3000ft and an IF not below 2300ft. This altitude is used by 75% of all aircraft in the country to transit between locations. The area covered is an AIAA not only by the Military, but at least 4 local airfields and 3 Gliding clubs, totally more than 250 flying machines. We at Rufforth East have 50.	See Section 4.2.4 (IAP)
		An aircraft on a 9 NM final in the landing configuration would have to come in with power to maintain glide slope. A noise abatement issue.	See Section 4.2.4 (IAP)

REF	Organisation	Key extracts from consultation response	Additional detail
		<p>The aircraft would not be descending at a reasonable rate, which would conflict with any other traffic heading north to south. ie Aircraft too high on approach not allowing other users the option to transit the area at the normal for GA aircraft travelling between local airfields of approximately 2000ft. The approach for 06 is even worse and effectively stops GA using the airspace between Doncaster and Leeds whenever an approach to LEA has been booked.</p>	<p>See Section 4.2.3 (Safety) and Section 4.2.4 (IAP)</p> <p>Any aircraft equipped with a suitable radio can request a UK Flight Information Service from LBA or DSA.</p>
		<p>The booking times seem to be very open and wide ranging, as the document declares no more than 1 aircraft an hour with no actual time, so if LEA has a fully booked day, then perhaps 10 aircraft will be arriving, effectively using 10 hours of airspace, which in real speak means the whole area will be blocked to GA between 1500ft and 3500ft all day. As we have over 8500 movements in a year, with Flexwing, Gyrocopter and GA operating from our airfield, this is going to be restrictive to us and the other airfields in the area who have many more movements than us.</p>	<p>See Section 4.2.3 (Safety)</p> <p>The one hour slot times are not restrictions on when other airspace users are able to operate, it is to give more predictability for IAP approaches and to ensure LEA and Sherburn approaches are not simultaneous.</p> <p>At an average airspeed in the region of 120 knots aircraft will traverse the vicinity in seconds.</p>
		<p>As a large proportion of Business Jets, Turboprops etc are single crew, we find it difficult to imagine that a single pilot can not only manage his CRM, but also use his airmanship to have a good lookout while following a GNSS track and maintain full control of his task. This is a major safety issue and using a GNSS approach in VFR conditions, where many aircraft of different types operate daily is, we believe extremely dangerous and is basically putting profit before the safety of other airspace users</p>	<p>See Section 4.2.3 (Safety)</p> <p>These types of procedures - IAPs in VMC - are being introduced elsewhere in the UK, and considering the points raised in #ACPO7 (Safety) LEA believe this risk is manageable. Furthermore, it will be a mandatory requirement for pilots using the IAP to have a visual lookout whilst in VMC and the risk is being assessed as part of the safety case.</p>
		<p>There is no joined up link with LARS providers and should an aircraft be working, Leeds, Humberside, Leeming, Doncaster, how would any GA pilot be expected to contact LEA on Air to Ground radio for traffic information, before returning to their LARS provider for onward transit?</p>	<p>Humberside did not feel arrangements were needed considering distance from LEA. Once RAF Linton-on-Ouse closed, Leeming was approached but</p>



REF	Organisation	Key extracts from consultation response	Additional detail
			did not feel arrangements were needed considering their distance away from LEA. Arrangements have been made with Leeds and Doncaster
		GNSS approaches in VFR is dangerous to other users and will restrict GA VFR flying to such an extent that pleasure flying in the Vale of York would be like playing Russian roulette	See Section 4.2.3 (Safety)
		The responsibility for airspace users being aware that an approach is to be made should not be the GA pilots, but it's difficult to work out how LEA could be certain "every" user is informed, therefore VFR GNSS should NOT be used unless under training with an instructor fully able to maintain a good lookout. Remember "On the right in the right" and a Flexwing aircraft at 55 mph would find it impossible to avoid an aircraft at 150kts if he can't see it over his wing. The single pilot, unless maintaining a good lookout would find it just as hard.	See Section 4.2.3 (Safety)
		From pilot statement:	
		I note the waypoint CM24I is at 9.3NM from the MAPt and has a minimum (not below) altitude of 2300' which is also MSA in that segment of EGCM. One would expect for an approach with a 318'/NM (3° descent angle) that an optimum altitude would be 3000' (accurately 2957'). There is an environmental impact of the platform altitude being 2300' at CM24I. If an aircraft were to fly level at 2300' from CM24I to CM24F, noise and pollution will be at it greatest.	See Section 4.2.4 (IAP)
		There is also a safety implication. A light aircraft transiting from East of York to the South will be above 2000' to avoid the various ATZ's in that area. In conditions of poor visibility, haze, winter sun etc a light aircraft is likely to be at 2300'/MSA, exactly at the altitude of an aircraft on approach to ECGM who will be on the GNSS approach because of poor visibility.	See Section 4.2.3 (Safety)
		Similar considerations exists for the RWY06 approach. The consultation document proposed approach plate shows a not below altitude at CM06I of 2200'. CM06I is at 11NM from the MAPt, commensurate with a 3° angle of approach an aircraft would be expected to be at 3500'. However, an aircraft on approach to EGNM RWY32 would be 4000' descending on their ILS, so clearly a much lower level for an approach to EGCM RWY06 must be used.	See Section 4.2.4 (IAP)

REF	Organisation	Key extracts from consultation response	Additional detail
		An aircraft on approach to EGCM RWY06 should be receiving a radar service from EGNM. An aircraft in IMC cannot/should not descend below MSA which from the EGCM chart in that sector is 3500'. However, the EGNM ATC Surveillance Minimum Chart (attached) depicts that whilst receiving a radar service from EGNM, aircraft may descend at the direction of EGNM ATC to 2200' in that sector. Have arrangements have been made with EGNM to provide radar service to aircraft inbound to EGCM RWY06?	LEA has an LoA with LBA to ensure safe operations for LBA and LEA
		Any light aircraft transiting between Leeds and Castleford at the base of EGNM's CTA at 2500', is likely to remain as high as possible without entering the CTA because of terrain. If an aircraft on approach to EGCM GNSS 06 were at 2300', they would be in proximity to any VFR traffic.	See Section 4.2.3 (Safety)
11	York Gliding Centre	No limits have been placed on visibility or cloudbase for execution of RNP approaches. From the consultation events, we are clear that RNP approaches will be conducted irrespective of the weather conditions and, hence, when cloudbase and visibility is adequate for glider and VFR power flying from local airfields, including Rufforth West	See Section 4.2.3 (Safety)
		<b>No account has been taken in the MAP design, of the fact that the Vale of York is designated as an Area of Intense Aerial Activity (AIAA), with the MAP path going through an area marked 'INTENSE GLIDING ACTIVITY' on CAA VFR charts.</b>	See Section 4.2.3 (Safety)
		<b>The estimation of the probability of conflict has been based on historical data which does not take account of the concentration of VFR traffic in the vicinity of the RNP Instrument Approach routes.</b> Moreover, any estimates of the probability of collision are based on historic airprox incidence in closer proximity to Leeds East Airport than is proposed for the RNP Instrument Approach Procedures. No evidence has been presented to support assertions that the probability of a collision or airprox is low throughout the IAP routes. Evidence is available of glider flights in the area that suggest strongly that these assertions are flawed.	See Section 4.2.3 (Safety)
		VFR traffic into Leeds East Airport is protected by an ATZ. Glider pilots operating locally navigate by ground features alone and the location and boundaries of the ATZ are clearly identifiable by reference to these markers (e.g Acaster Malbis disused airfield; the bifurcation of the main railway line; the proximity of ATZ to Tadcaster etc). Pilots operating from Rufforth West know to look out for these features when flying South of the A64 dual carriageway and to remain outside the ATZ either horizontally or vertically. The IAP extends far beyond the ATZ's footprint; <b>the proposed MAP is not identifiable by any significant ground feature while aircraft using it may still be climbing as they pass through the Area of Intense Gliding Activity associated with</b>	In VFR class G separation assurance is maintained by see and avoid. The LEA participating traffic will, when VFR conditions exist, be required to have a mandatory lookout.  The missed approach is a rare event, and the radio calls will provide advanced warning.

REF	Organisation	Key extracts from consultation response	Additional detail
		<p><b>Rufforth West airfield.</b> Consequently, <b>historical data based on airprox involving VFR traffic within or close to the LEA ATZ are of little value</b> when IFR traffic is being routed into areas in which high concentrations of VFR traffic is operating and the pilots of aircraft operating under VFR have no clear ground features of which to remain clear in order to avoid potential conflict. Briefing glider pilots about where to avoid flying if a Missed Approach at LEA is announced is extremely problematic if reference cannot be made to prominent ground features and altitudes to avoid</p>	<p>The altitude is known, at CMM09 it is not below 2500ft</p> <p>The VRP's are not on any of the procedures, it is worthy of consideration to add, for example, "Remain north of the VRP Naburn to add an additional safety margin</p> <p>We disagree there are no ground features. For instance, the 24 MAP around Tadcaster has Thorpe Arch trading estate, Wighill, Clifford, all of which could be used to ensure segregation from the 24 MAP traffic on the rare occasion it would be used. LEA are happy to work with YGC to identify such landmarks.</p>
		<p>Instrument Approach Charts have been designed without any reference to the capability of aircraft flying under Visual Flight Rules (VFR) to avoid mid-air conflict situations in terms of performance (typically 45 KIAS and 1:28 glide ratio in still air); in terms of ground features delineating 'area to avoid' and in terms of the need to identify a particular altitude at which aircraft on the missed approach will pass through the Area of Intense Gliding Activity</p>	<p>The designs provided in the consultation documentation are graphical representations of the procedure only and not meant as a chart for AIP publication. State approved charts will be produced by NATS for publication in the AIP following approval of the designs.</p> <p>LEA are happy to discuss what data users would like to see included in the final chart, which will be passed on to NATS for consideration and/or inclusion.</p>

REF	Organisation	Key extracts from consultation response	Additional detail
		<p>The <b>observation, in the current proposal document, that the closure of RAF Linton-on-Ouse frees up airspace to the North fails to take account of the need for locally soaring aircraft to operate upwind of the airfield.</b> When the wind favours runway 24 at LEA, gliders from Rufforth West need to concentrate to the SW of their airfield in the marked area as Intense Gliding Activity. In the current proposal, this is the area through which the associated Runway 24 MAP is routed. We believe that this is dangerous and unnecessary and requires more thorough exploration of the alternatives. We noted from the presentation by the IAP designer in the online Technical Workshop that the design routings as prescribed, could bring the area even closer to Rufforth West Airfield considering navigation accuracy and the tolerances required around a procedure.</p>	See Section 4.2.3 (Safety)
		<p>We note that the majority of authorised RNP (GNSS) approaches in Class G Airspace without ATC provision in the UK are in more remote areas of Scotland with little adjacent traffic to conflict. The only comparable ACP to LEA's has been for Northampton Sywell Airport but a key difference from LEA is that the nearest gliding sites to Sywell, Lyveden and Husbands Bosworth, are both some 11NM or more from airfield edge to airfield edge (10.0 NM and 9.7NM respectively from the edge of the ATZ). <b>Rufforth West airfield is 5.8NM from the edge of LEA and 3.9NM from the LEA ATZ and the area between us is designated as an area Intense Gliding Activity on CAA VFR charts. We see no recognition of this in terms of hazard mitigation in the proposal (See the authoritative guidance in Annex 1a and 1b)</b></p>	See Section 4.2.3 (Safety)
		<p>We do not believe that the full range of RNP IAP routings has been explored but we do believe that, if they were, routings could be proposed which would minimize collision risk for VFR traffic. During the consultation, CAA representatives stated that other options could be explored within the specification for RNP approaches but only standard designs have been presented.</p>	See Section 4.2.4 (IAP)
		<p>There has been insufficient investigation of alternative approach paths and missed approach paths that are cognizant of the high intensity of local traffic and the number of busy airfields within close proximity. In particular, we see no evidence that the outputs from the GAINS Project, led by AOPA and published by the EU ('GAINS D2.3 Navigation Concept' available at <a href="https://ec.europa.eu/research/participants/documents/downloadPublic?documentId=080166e5c936926e&amp;appId=PPGMS">https://ec.europa.eu/research/participants/documents/downloadPublic?documentId=080166e5c936926e&amp;appId=PPGMS</a>), or the full range of options (deemed permissible by the CAA) to have been seriously considered</p>	See Section 4.2.4 (IAP)

REF	Organisation	Key extracts from consultation response	Additional detail
		<p>Too little account has been taken of the fact that Rufforth West Airfield, besides being a gliding airfield with aerotow and winch operations, is host to a considerable number of powered aircraft and receives both recreational and business aircraft on a regular basis, seven days a week and that such home-based and visiting aircraft may use the airfield even when there are no volunteer or employed staff on site. Our office is currently staffed on Wednesdays and Thursdays (09:00 to 17:00) and on Saturdays and Sundays (10:00 to 14:00) only, although both gliding and power flying can occur any day of the week between sunrise and sunset. Wednesday, Saturday and Sunday are 'Club' flying days when volunteer instructors are rostered but qualified pilots may fly, and do fly, on any day of the week.</p>	<p>See Section 4.2.3 (Safety)</p>
		<p>AIP ENR 1-5-6-2 states that, for instrument approaches outside controlled airspace, ' A number of these aerodromes have notified Visual Reference Points (VRP) and Visual Routes (VR) which are geographically de-conflicted from the instrument patterns and, notwithstanding that their use is voluntary, VFR pilots may be requested to route with reference to these'. <b>The VRP at Tadcaster Junction and Naburn Lock appear to be within the missed approach path accuracy tolerance of 1NM (stated in the proposal) yet the proposal contains no information about how the separation of VFR and IFR traffic will be assured at these 'honey-pot' locations.</b> This could be addressed through a reconsideration of the MAP.</p>	<p>See Section 4.2.3 (Safety)</p> <p>The VRP's are not on any of the procedures. LEA will consider adding notes, for example, "Remain north of the VRP Naburn" to add an additional safety margin</p>
		<p>The proposal estimates 5 approaches per day, with each approach occupying a one-hour slot, but it acknowledges a low likelihood of a missed approach being flown. We note, however, that the stated low possibility of a missed approach does not equate to the requirement to keep this airspace available for a missed approach. Gliders are relatively slow moving and are dependent on the lifting conditions to be able to navigate themselves away from a threat (even over short distances given variable conditions). The MAP would unacceptably exclude gliders from this region on the basis of safety, which would have considerable commercial impact on our gliding club. With the MAP as proposed, York Gliding Centre would be required to take the safest approach to the threat posed, potentially keeping its fleet on the ground for each one-hour slot to be sure of being able to avoid an aircraft on the missed approach (which may or may not be used). This could mean no gliding at all if LEA fills all its daily slots. We accept that low volumes of IFR traffic are expected initially, but the purpose of the</p>	<p>See Section 4.2.3 (Safety)</p>

REF	Organisation	Key extracts from consultation response	Additional detail
		ACP is to grow traffic over time. This cannot be tolerated if it is at the expense of the viability of other airfield operators in the area.	
		LEA and Sherburn Aero Club (SAC) have separately and collectively proposed a shared slot system for RNP IAP arrivals. The volume of IFR traffic impinging on the operations of other airfields is a product of the shared slot system. Both collision and commercial risk to other airfields (from temporary grounding of VFR traffic) cannot be appraised accurately unless the procedures associated with the proposals for both LEA and SAC are considered together. However, the LEA RNP ACP has been presented for consultation in isolation.	See Section 4.2.1 (Process)
		LEA has proposed in the consultation events that training in operating the procedure would be confined, by agreement, to times when no gliding is taking place at Rufforth West airfield. However, multiple approaches would be permitted within each one-hour slot each of which, for training purposes, could include a missed approach. Although 'club gliding' is typically confined to three days a week, qualified pilots can arrange to fly on any day and the owners of motorised aircraft (including self-launching gliders) typically prefer to fly when the club is not being used for instructional gliding (club days). No account has been taken of the safety mitigations required to manage these scenarios or of the commercial impact on York Gliding Centre. These risks would be lessened if less intrusive missed approach routing could be found by LEA.	<p>Only one approach will be permitted per one hour slot.</p> <p>For pilots flying on non-club days, it would be anticipated that the pilot would coordinate with LEA to understand the traffic situation before flying. This is not to restrict the pilot's movements, but to give them an accurate picture of likely movements in and out of the airport.</p> <p>Furthermore, all training flights will have an LEA-approved instructor, or an LEA-approved safety pilot on board who will provide an additional visual lookout.</p>
		<b>We have not been given sight of the Safety Case for the proposal and so it is impossible to confirm that it is adequate to mitigate our concerns.</b> Our own analysis (Bowtie Diagram appended to this objection which is included as both a btw and as a jpg file) suggests strongly that risks can only be reduced to an acceptable level if written agreements are established with adjacent airfields and alternative IAP routings are agreed. Leeds East Airport has indicated in the consultation events that, although it would prefer to agree written protocols with nearby airfields, it is prepared to proceed	See Section 4.2.3 (Safety)

REF	Organisation	Key extracts from consultation response	Additional detail
		without them; but has failed to indicate how risks identified by other airfields will be mitigated	
		York Gliding Centre believes that Letters of Agreement are an essential component of the safety case and that those who share airspace with Leeds East Airport traffic have a right to contribute to the evaluation of risk and the verification that mitigation is adequate. <b>We feel strongly that Letters of Agreement must be negotiated collectively: involving all local airfield at the same time so that mitigations agreed with one airfield do not cause issues for another.</b> Furthermore, Letters of agreement must be developed alongside the substantive Airspace Change Proposal and, importantly, they must all relate to the IAPs and MAPs that will be used if the ACP is agreed by the CAA. These consultative mechanisms have not been followed despite the Yorkshire Gliding Clubs agreeing this with LEA in October 2020	See Section 4.2.3 (Safety)
		Although local gliding clubs have informed the Proposers on a number of occasions, <b>too little regard has been paid in the ACP to the special status of the Yorkshire area with regard to gliding potential and hence to the volume and nature of transiting traffic.</b> The potential for soaring in the area throughout the year has led to the location of four gliding clubs in close proximity (York Gliding Centre at Rufforth West, Yorkshire Gliding Club at Sutton Bank, Wolds Gliding Club at Pocklington and Burn Gliding Club near Selby).	See Section 4.2.3 (Safety)
		Very often, thermal soaring conditions favour North-South routes with gliders from the North heading South then returning later, and gliders from clubs in the South of England heading North. A letter of agreement between the British Gliding Association and Doncaster Sheffield Airport (DSA) has the effect of routing gliders either side of DSA's airspace producing a high concentration of gliders in the area LEA in thermal conditions (See Annex 2a and b). We can see no recognition of this focusing effect in LEA's ACP and nothing to indicate how associated risks will be mitigated.	See Section 4.2.3 (Safety)  LEA are more than happy to have an LoA with the BGA if this is useful for transiting aircraft
		Similarly, we can see <b>no recognition of the fact that gliders and motorgliders in the Yorkshire area, can access lift from mountain wave throughout the year when the wind conditions are favourable.</b> This is recognised nationally by the provision of Temporary Reserved Areas for Gliders (TRA(G)) in Class C airspace above Yorkshire from FL195 to FL600, and of Non-SSR Gliding Areas (NSGA) above Yorkshire to allow gliders to access the TRAG without a transponder when above FL100 (See AIP ENR 6-3-0-1; 6-64 & 6-66). Wave flights will place gliders, no longer on local gliding frequencies, above cloud or on the 'blind side' of cloud at a range of flight-levels extending much higher	See Section 4.2.3 (Safety)

REF	Organisation	Key extracts from consultation response	Additional detail
		<p>than in other areas of the country. Again, we see no recognition of the associated risks in the ACP indicating inadequate research into the likely hazards and the required mitigations.</p>	
		<p>From Annex 1a, Airprox board extract: The best advice is therefore to avoid a glider site by a good margin if at all possible, paying particular attention to the areas immediately above and upwind of the site.</p>	
15	Burn Gliding Club	<p>Of particular concern is the intention to allow use of the facility for IFR flights in VMC, including training. Subject to mutually agreed negotiations and adjustments to the track designs BGC may be able to accept the introduction of RNAV approaches if restricted to supporting the safe arrival of aircraft in bad weather. We consider the risks introduced by the proposed design and additional applications are significantly outside acceptable safety limits.</p> <p>Sherburn Aeroclub (SAC) is also applying for RNAV approaches. Their tracks overlap your proposed tracks, route through the same areas of 'Intense Gliding Activity' and are close to BGC. You and SAC have accepted they cannot be operated independently and they will be managed jointly. There is no reference to the SAC proposals in your Consultation Document.</p> <p>Tracks for both proposals route through an area of 'Intense Gliding Activity' and close to Burn airfield. There is a total of 7 tracks, 2 within 0.5 miles of Burn runways used for winch launches with approval to 3000' above site. This is a complex distribution of tracks with different heights which will be difficult to navigate, especially for transit aircraft.</p> <p>The Consultation Document offers no information relating to your risk assessment and mitigation. The Yorkshire Gliding Group (YSG) have undertaken a risk assessments which has identified numerous safety issues with your proposals. We cannot be sure these have been covered and mitigated correctly in your assessment. As a goodwill gesture we have previously passed you a copy of the summary to support your risk assessment. Given the extensive risks outlined in our document, we would have expected an appropriate response identifying your proposed mitigation, or even a full re-consideration of your proposal, which CAP 725 identifies a legitimate option during the consultation process.</p>	See Section 4.2.3 (Safety)
		<p>We are joint Class G airspace users and regard being denied access to your risk assessment as extremely unreasonable</p>	See Section 4.2.3 (Safety)



REF	Organisation	Key extracts from consultation response	Additional detail
		You advised us your assessment used historical information collected from past Airprox reports. GNSS approaches are relatively new and there will be few reports specific to this type of procedure. We had expected some forward thinking would be involved. Of more concern we understand your safety team was not aware of the 2020 Airprox at Cranfield until pointed out by the YSG at the last Workshop meeting. This supports our assertion that there could be omissions in your risk assessment and a joint risk assessment was essential from the outset of your proposal	There was a requirement on LEA to review airprox in the Vale of York, which was conducted. There were no airprox that indicated a cause for concern
		RNAV approaches in use elsewhere in the UK and Europe and are situated in areas less populated with airfields and aircraft. In all cases the footprints cover a smaller area than those proposed by LEA. This raises the question 'Why are the LEA footprints larger than those for other RNAV approaches?'	See Section 4.2.4 (IAP)
		You state the choice of heights for the MAP close to Rufforth and Burn are a problem for you due to the a design limitation of a maximum permitted MAP climb angle of 2.5%. This has increased the footprint of the MAPs to ensure aircraft are at 3000' when close to Burn airfield. If this is to mitigate risk for BGC it confirms LEA are not fully aware of how gliding clubs operate. For example, where rw06 MAP for CAT A&B pass close to BGC airfield you would be more likely to encounter a glider at 3000' than at 2200'.	There is no maximum permitted Missed Approach climb gradient. The Missed Approach Procedure is designed to accommodate a minimum climb rate of 2.5%
		We cannot imagine why a designer should choose to position the MAP for rw06 CAT C&D almost overhead BGC airfield, or how your Risk Assessment can conclude the consequences can be mitigated. This track also routes over Barlby, Selby and Brayton despite the designer's brief that built up areas should be avoided. There is something wrong with the parameters being used here.	See Section 4.2.3 (Safety) and 4.2.4 (IAP)
		If the weather is 'bad' BGC would normally be unable to fly or only be operating with a few gliders close to the airfield. If LEA were able to reliably limit use of the CAT A&B RNAV approaches for 'Bad Weather Conditions', the primary objective behind the GNSS procedures development, the risk of conflict would be significantly reduced.	See Section 4.2.3 (Safety)  Although the risk may be reduced with limiting operations to IMC, LEA believe the risk in VMC to still be acceptably low. LEA needs to provide the procedure at all times.
		In contrast, on a mid year 'good weather' VMC thermic day, between 10:00hr and 18:00hr there could be several gliders operating in local airspace shared with the proposed MAPs. If the MAPs are flown to IFR, BGC consider the risks introduced as outside acceptable limits, and could not be reliably managed. Although LEA state less	See Section 4.2.3 (Safety)

REF	Organisation	Key extracts from consultation response	Additional detail
		<p>than 1% of arrivals have to 'go-around' Burn would not know when the 1% would occur and therefore have to assume the MAPs could be needed for every arrival unless the 'go-around' was to be flown IFR by the pilot. If the MAPs are used for training then the MAPs would be in repeated use and lookout would depend on the instructor who could easily be distracted by trainee needs in the cockpit. There is a range of use between the 2 extremes. These will introduce different levels for risk of conflict dependent on the Approach/MAP design and the density of aircraft sharing the same airspace. It would appear that the LEA designer and risk assessment teams have not considered these options</p>	
		<p>We would be unable to consider acceptance of the rw06 CAT C&amp;D MAP under in any conditions due to the routing passing overhead Burn airfield when quoted lateral tolerances are added. We note this procedure fails to acknowledge BGC's stated winch launching height of 3,100' as identified on the CAA's chart.</p>	See Section 4.2.3 (Safety)
		<p>As most of the airfields support GA operations, the density of the aircraft is dependent on the time of year, and time of day. ie good weather days - very busy, poor weather days - not so busy. Hence, if the use use of calculated annual averages is used for the LEA Risk Assessment this will significantly underestimate the risk of conflict.</p>	See Section 4.2.3 (Safety)
		<p>LEA will have no control over how an operator/pilot will manage these flights, and if used for training even the best managed flights could fail on lookout due to distraction with the worst possible consequences. The MAPs route through airspace close to BGC and neighbouring gliding sites which can contain several gliders operating at heights similar to the MAP tracks. The layout and proposed use of the Approach and MAP tracks suggest to us that you are not fully aware of the risks involved resulting in omissions in your Risk Assessment. We would refer you to the 2020 Cranfield Airprox report.</p>	See Section 4.2.3 (Safety)
		<p>We believe the LEA approach of working at arm's length using a question-and-answer procedure will not enable you to understand the serious risks for all aircraft sharing the same airspace brought about by the introduction of you latest proposals. Open minds, the sharing of information, and direct discussion with design and safety personnel is the only way to safely manage the introduction and utilisation of the RNAV approaches in the crowded airspace we share.</p>	<p>LEA are bound by the processes outlined in the ACP CAPs and want to ensure as great a transparency and traceability as possible. This is aided by publicising our responses to each question received.</p> <p>LEA have organised a public workshop to discuss the proposals and</p>

REF	Organisation	Key extracts from consultation response	Additional detail
			<p>comments, as well as hosting additional workshops at the request of aviation stakeholders in a bid to engage in useful and constructive dialogue.</p> <p>LEA fully understands the risks and mitigations to safely operate</p>
		<p>It could be said that separating the LEA and SAC proposals when Consulting with aviation stakeholders is giving strategy priority over safety. LEA and SAC realise the safety implications for operating the 2 proposals separately and have introduced a formal joint operating procedure. However, they have chosen to omit reference to the SAC proposals and any agreement with SAC in their Consultation Document or in later Workshop meetings.</p>	<p>The LoA with SAC is noted in the consultation document (page 15).</p> <p>See Section 4.2.3 (Safety)</p>
		<p>In contrast, on a mid year 'good weather' VMC thermic day, between 10:00hr and 18:00hr there could be several gliders operating in local airspace shared with the proposed MAPs. If the MAPs are flown to IFR, <b>BGC consider the risks introduced as outside acceptable limits</b>, and could not be reliably managed.</p>	<p>See Section 4.2.3 (Safety)</p>
		<p>Burn would not know when the 1% MAP would occur and therefore have to assume the MAPs could be needed for every arrival unless the 'go-around' was to be flown IFR by the pilot. If the MAPs are used for training then the MAPs would be in repeated use and lookout would depend on the instructor who could easily be distracted by trainee needs in the cockpit</p>	<p>See Section 4.2.3 (Safety)</p>
19	RSAG	<p>RSAG also find it perturbing that, given the intense GA and gliding activity in this area, LEA did not include the BGA and LAA as aviation stakeholders given their national roles.</p>	<p>See Section 4.2.1 (Process)</p>
		<p>It is documented in the minutes of the Framework Briefing for this ACP (26/10/2016) that a specifically designed to avoid large conurbations and airfields; Brighton, Burn, Full Sutton, Pocklington, Rufforth and Sherburn".</p> <p>It is proposed to implement the IAPs and MAPs in the proximity of the three local and active gliding clubs mentioned. This will significantly impact their day-to-day operations and their ability to carry them out safely and thereby their businesses. This takes no account of the design consideration stated in the Framework Briefing.</p>	<p>LEA does not accept this statement. The routes and mitigations have been discussed in several meetings with the gliding clubs. The designers have modified the tracks to minimise impact on all stakeholders</p>

REF	Organisation	Key extracts from consultation response	Additional detail
		<p>The proposed new IAPs, MAPs cross the route of a major north/south, south/north cross- country route used by glider pilots from across the country and also by large numbers of GA and other traffic, which either cannot or seeks not to enter the Class D Controlled Airspace (CAS) at Doncaster Sheffield Airport (DSA) and Leeds Bradford Airport (LBA). The proposed routes are close to the northern mouth of the Upton Corridor, a known and already congested ‘pinch point’ on that route where northbound traffic will be ‘fanning out’ into the Vale of York, an Area of Intense Aerial Activity (AIAA), and where southbound traffic will be ‘funneling in’ to the corridor. The area to the north of the Upton Corridor and in the proximity of the three gliding clubs closest to LEA is also defined as an Area of Intense Gliding Activity (AIGA). This demonstrates at best LEA’s total lack of understanding of and, at worse, their total disregard for the modus operandi of the soaring and wider aviation community operating in these areas.</p>	<p>LEA does not accept this statement. The routes and mitigations have been discussed in many meetings with the gliding clubs. The designers have modified the tracks to minimise impact on all stakeholders</p> <p>See Section 4.2.3 (Safety)</p>
		<p>The proposed IAPs and MAPs are close to similar IAPs and MAPs proposed for nearby Sherburn Aero Club (SAC) and both ACPs are being ‘managed’ by the same consultant. It is intended that the procedures associated with the management/use of these routes are shared between LEA and SAC. Collectively, these routes provide increased complexity and, therefore, impact on the day-to-day operations of the clubs closest to LEA and their businesses. This takes no account of the design consideration stated in the Framework Briefing and, furthermore, RSAG believes that, given the interdependencies, these two proposals should be considered collectively by the regulator.</p>	<p>See Section 4.2.3 (Safety)</p>
		<p>LEA intend to use the proposed IAPs and MAPs in VMC with no cloud base minima and to use those proposed routes for training purposes. One consequence of this will be the possibility of aircraft using the approaches emerging from IMC into an area of Class G airspace in VMC where potentially high numbers of VFR GA (including gliding) traffic is operating. This again demonstrates at best LEA’s total lack of understanding of and, at worse, their total disregard for the modus operandi of the soaring and wider aviation community operating in these areas. Indeed, during a recent online workshop, an LEA representative acknowledged the risks of IFR/VFR conflict arising from the proposal.</p>	<p>LEA does not accept this statement. The routes and mitigations have been discussed in many meetings with the gliding clubs. The designers have modified the tracks to minimise impact on all stakeholders</p> <p>See Section 4.2.3 (Safety)</p>
		<p>All the situations described above impose new or increased risks to the local aviation community. These include the real risk of mid-air collision. LEA’s assessment of risks and proposed mitigations have not been presented as part of the proposal. Indeed, in response to queries raised through the consultation process, RSAG was advised the risk assessment was proprietary to LEA and not for the public domain. None of the</p>	<p>See Section 4.2.1 (Process) and 4.2.3 (Safety)</p>

REF	Organisation	Key extracts from consultation response	Additional detail
		<p>stakeholders, including the soaring community, have seen the risks LEA has identified that their proposal will introduce, nor any mitigations for them.</p> <p>We were asked for and provided our own highly detailed assessment of risks and potential alternative routes at two stakeholder workshops. CAP 725 allows for the modification of an ACP design following consultation, yet LEA representatives have been markedly reluctant to consider that option. Instead, we were advised that, if there were any that LEA considered relevant, they would address them in the consultation report. Given the absence of meaningful consultation and the failure of LEA to understand the modus operandi of the soaring community, there are serious concerns as to what LEA might consider 'relevant'. Accordingly, RSAG does not believe LEA meets its responsibility under CAP 725 as the Change Sponsor to "ensuring that it satisfies and/or enhances safety" – Section 11.</p>	
		<p>The consultation document refers to possible Letters of Agreement (LoAs) with the Yorkshire Clubs as a means of mitigating risk but no drafts relevant to the current proposal have been provided. It will not be acceptable if LEA follows the example set in earlier discussions and produce LoAs which seek to commit the gliding community to stay away from the proposed IAPs and MAPs, thus in effect allowing LEA its own CAS in Class G airspace! Given that it is LEA making the proposal, the onus must be on LEA to identify and categorise those risks and to put in place appropriate mitigation. That mitigation should not be predicated on restricting existing other airspace users and passing the safety issue to them for mitigation.</p>	See Section 4.2.3 (Safety)
		<p>A fundamental principle of consultation is that consultees should be provided with sufficient reasons for and information about the proposal to allow for intelligent consideration and response. In the Further Consultation, we have been presented with only half a proposal. Whilst the IAPs and MAPs are described together with projected usage; how they will be managed is only addressed superficially and how they will operate in an area already heavy with other traffic, including gliding, is not addressed at all. No assessment of risks or their mitigations has been presented. We do not know how it is intended to work in practice. The absence of any meaningful information on LEA's Concept of Operations is deeply worrying and, at best, raises concerns as to the depth of their thinking on these matters.</p>	See Section 4.2.3 (Safety)
		<p>The complexities of this proposed implementation should not be underestimated. When we have queried the rationale behind introducing RNP approaches into this already heavily used area of airspace without ATS or radar surveillance cover, we have</p>	See Section 4.2.3 (Safety)

REF	Organisation	Key extracts from consultation response	Additional detail
		<p>been directed to 'similar' RNP approach implementations at Sywell and Lasham. Having consulted with users of both these airfields, we find that at Sywell the MAPs and IAPs were specifically designed to keep away from an AIGA "for obvious reasons" and at Lasham the IAPs are intended to be used 10 times p.a. and not up to 11 times per day as at LEA and potentially more with training 'go- arounds'.</p>	
		<p>We have, from the outset offered to engage with LEA to try to achieve mutual acceptable outcomes from this ACP. However, the processes followed for stakeholders to submit queries and the two stakeholder workshops appeared to be no more than 'box-ticking' exercises and provided little, if any, of the information we requested and no opportunity for sensible and constructive dialogue. LEA's response that those queries they consider 'relevant' will be addressed in its consultation report and not before, these processes failed to add to our understanding of the proposal. Therefore, as LEA has not presented a full proposal for consideration by stakeholders this consultation is fundamentally flawed. RSAG does not believe LEA meets its responsibility under CAP 725 as the Change Sponsor to be "Accountable for identifying relevant stakeholders and conducting an effective consultation exercise".</p>	<p>The LEA consultation material is fully consistent with the scale of detail in an airspace change of this level. The purpose of the workshops was to provide more information to the consultees and this was achieved. In addition to this consultation, LEA and the glider community have held a number of meetings. An LoA was agreed with YGC. YGC had a change in strategy and withdrew from the LoA. In part this was due to an error by the APDO who incorrectly drew the MAP track. When corrected YGC objected as it was nearer their operations. LEA came up with alternative procedures for CAT A&amp;B (as per the original track which was accepted by YGC) and a CATC&amp;D track. It was stated that the CAT C&amp;D would not be flown without prior dialog specifically relating to that one movement. Additionally, LEA stated that the movements could be before 10am, and after 4pm where possible. The number of CAT C&amp;D is likely to be only 2 or 3 per week.</p>
		<p>RSAG has significant experience of engaging as stakeholders with sponsors of ACPs following CAP725 and CAP1616 and we understand that LEA has been directed to follow the former process. We do not know if this is because this proposal predates</p>	<p>See Section 4.2.3 (Safety)</p>

REF	Organisation	Key extracts from consultation response	Additional detail
		<p>CAP1961 which was introduced specifically for GNSS Approach proposals or because of the complexities of this implementation.</p> <p>Given the complexity and level of risk that we can see the proposal generates we understand that it requires a level of rigour beyond that required for standard 'out of the box' implementations of RNP approaches. Accordingly, we believe that the rigour and transparency offered by CAP1616 would have been a better approach for these ACPs in an AIAA.</p>	
20	Wolds Gliding Club	<p>Introducing an RNAV approach in an Area of Intense Aerial Activity which relies on Class G see and avoid separation requires careful consideration by all aviation stake holders. Through our Regional Soaring Airspace Group (RSAG) we identified multiple risks and presented them to the sponsors at the risk workshop on the 21st April 2021 using the Bow Tie risk assessment model. We have received no mitigations to the Bow Tie model or had sight of similar risk assessments. We can only conclude that either:- a) The risk assessment has not been done. b) The risk assessment is done but withheld from stakeholders. Either way it would be irresponsible for our club to support such a proposal until we have clear understanding of how risks and mitigations have been identified. We did receive a verbal assurance from Leeds East spokesman Mr Hallas that historically the chances of collision are very low. However, Airprox No 2020082 on 29th July 2020 involving a glider and twin engine aircraft performing an RNAV approach VFR in class G, identical to the arrangement proposed at Leeds, suggests we have a more immediate problem. Historical collision rates are meaningless if you are introducing a new form of risk. Without proper risk assessment these important lessons are too easily overlooked</p>	See Section 4.2.3 (Safety)
		<p>We attended an approach design workshop on 29th April 2021. We gave a comprehensive briefing about our movements and how we operate. We highlighted where the RNAV tracks would cause conflict with our operation and suggested multiple solutions (Annex D) which were backed up with similar industry standard examples. Despite our multiple suggestions nothing was changed. The approach design algorithms seem to be optimized to construct RNAV approaches in controlled airspace. It was unable to manage the constraints imposed by Class G airspace (multiple airports in close proximity operating at low levels). At some stage somebody needs to accept it just doesn't fit safely</p>	See Section 4.2.3 (Safety) and 4.2.4 (IAP)
		<p>By mathematically modelling movement numbers around Sywell and Leeds we have been able to compare risk points. Although it is difficult to define the actual risk we can</p>	See Section 4.2.3 (Safety)

REF	Organisation	Key extracts from consultation response	Additional detail
		make a risk comparison. Compared to Sywell, Leeds East has significantly more risk because the RNAV tracks run closer to multiple high movement gliding clubs.	
		Although it is difficult to define the actual risk we can make a risk comparison. Compared to Sywell, Leeds East has significantly more risk because the RNAV tracks run closer to multiple high movement gliding clubs.	See Section 4.2.3 (Safety)
		With the loss of RAF Linton on Ouse the LARS coverage across the area especially around the RNAV procedure is incomplete. This denies RNAV aircraft the safety benefit of primary radar returns from conflicting gliders.	Despite the lack of LARS coverage, LEA's view is the change is safe. A UK Flight Information Service is available from LBA/DSA
		We previously welcomed the use of flarm monitoring equipment at Leeds East. Many of our members have recently upgraded their Electronic Conspicuity using the CAA grant funding scheme. We oppose the introduction of IFR approaches which have no formal means of separating other Class G VFR users.	See Section 4.2.3 (Safety)
		We note that a message will be broadcast announcing the start of the procedure on gliding frequencies but assume that no information will be passed to gliders about the location of aircraft flying the procedure, therefore glider pilots will lack any situational awareness about conflicting traffic	See Section 4.2.3 (Safety)
		Because of airspace pinch points between Doncaster Sheffield and Leeds Bradford, gliders from outside our region funnel between the airspace gap and into the Vale of York. This will concentrate gliders into critical areas around the RNAV approach. Glider pilots will have limited knowledge of any transit arrangements or the complex RNAV layouts especially when we consider point 8.	For any cross-country flights, LEA would expect users to plan their flight and look into any potential movements out of LEA. This includes users who are in the vicinity of the airport calling Leeds East for traffic information.  A mitigation proposed by LEA is to have all movements broadcast on the glider frequency.
		Adding Sherburn's RNAV approach on top of Leeds East RNAV makes it incredibly difficult for glider pilots to maintain situational awareness and understand where instrument traffic is located on the procedure	No movements will be conducted simultaneously across LEA and Sherburn, and therefore aircraft using a specific slot should be known to other users, including which aerodrome they are using



REF	Organisation	Key extracts from consultation response	Additional detail
		<p>"It must be emphasized that the establishment / notification of IAPs to aerodromes without an instrument runway and/or approach control must be seen as exceptions to the normal standard"</p> <p>By comparing Leeds East to established RNAV procedures in class G we believe the introduction of an RNAV approach in this area cannot be regarded as normal as we have shown in point 3.</p> <p>"It is considered very unlikely that a cogent safety argument could be made for an IAP to be established which would introduce instrument traffic at a busy aerodrome with an active visual traffic pattern without provision of Approach Control. Conversely, a more persuasive safety case could be made in support of an application for a GNSS-based IAP to a minor aerodrome which is located within the control zone of an adjacent major aerodrome and has only a small number of daily movements. Similar risk-based arguments could be made in other specific circumstances, for example an aerodrome in a remote area with low levels of local traffic"</p> <p>We do not believe Leeds East fits any of these criteria.</p>	<p>LEA believe the current traffic levels, both at LEA and locally could be considered low. To this end, a traffic study is currently being conducted to better understand the quantity of flights in and around LEA airfield. This will be used as an input to the safety assessment, itself reviewed by the CAA.</p>
23	Church Fenton parish council	Concerns have been raised by council members regarding the potential increase in night flights into the early hours and there is no reference to this in the consultation.	See Section 4.2.2 (Noise / Traffic)
		There is a recognition of increased noise and air pollution with a doubling of air traffic annually especially as the potential type of aircraft increases will come from small jets as appose to propeller drive aircraft; which indirectly will cause more noise pollution than small propeller craft. If the majority of these arrivals are coming from business guests, then there is potential is for an increase in local traffic and noise pollution from the onward travel for these clients and back to LEA for return trips.	See Section 4.2.2 (Noise / Traffic)
		A new flying school is going to be based at the LEA provided training for pilots. There are currently no planning permission restrictions on any flights in and out of LEA which potentially raises concerns for the Parish Council.	See Section 4.2.2 (Noise / Traffic)
		The consultation has not taken into account the potential increase from new training facility service. This is not ideal as we feel that there is no economic benefit to Church Fenton directly, perhaps only for the local companies based on site such as the taxi firm.	See Section 4.2.6 (Economic benefits)
		EGNOS will not be available after 25 June 2021 as the UK has left the EU, therefore increasing the number of flights into Leads East Airport will increase the chances of an	See Section 4.2.4 (IAP)

REF	Organisation	Key extracts from consultation response	Additional detail
		<p>aircraft related accident.</p> <p>The fall-back position of using the LNAV system, a basic two-dimensional guidance system should only be used in VFR (Visual Flight Rules), and is totally unsatisfactory for an airport in the North of England trying to operate a commercial airline, where the pilots will be under pressure to reduce operating costs.</p>	
25	APPLETON ROEBUCK AND ACASTER SELBY PARISH COUNCIL	<p>Leeds East Airport contacted over three hundred consultees and yet only arranged one two-hour consultation workshop for stakeholders on 14 April 1000 – 1200, It also stated that joining details would be sent out in advance to all consultees. The Parish Council cannot trace receive any joining instructions for the meeting, even though we are close to the airport.</p> <p>We understand there were only twelve people present at the meeting and these were mainly from the local gliding clubs and one Parish Councillor from Church Fenton, and that your first consultation was rejected by the CAA, because of lack of consultation with local consultees.</p>	<p>All local parishes were included on the distribution list with details sent out. At request of participants on the April workshop, two further workshops were held to discuss specific concerns related to safety and the IAP themselves.</p> <p>Specifically the following email address was included in consultation distribution: clerk@appletonroebuckandacasterselby-pc.gov.uk.</p>
		<p>We feel that again the consultation process is inadequate, leaving many unanswered questions, one of which is how the proposals will interact with the Airport being put forward to create a new settlement of 3500 homes</p>	<p>See Section 4.2.2 (Noise / Traffic)</p>
26	STILLINGFLEET PARISH COUNCIL'S	<p>The proposed changes would have an environmental impact upon the people and community and contribute to the situation of environmental danger faced by all of our society - locally, nationally and internationally.</p> <p>LEA wishes to increase the number of aircraft movements by 300% and also increase the size of aircraft that can use an air corridor above the village. Additionally, the planes will be permitted to fly at less than ½ mile altitude from the village on approach to the airport. This will have a massive impact environmentally.</p>	<p>See Section 4.2.2 (Noise / Traffic)</p> <p>The location of Stillingfleet places it on the runway centre line, and cannot be avoided during an aircraft's final approach as has been the case since the runway was first used.</p>
		<p>Aviation emissions make up 15% of the UK's total carbon footprint and are already the single greatest offender in the UK. The proposed LEA changes - literally - fly in the face of national and global climate ambitions and agreed targets.</p> <p>In the National Planning Policy Framework (NPPF) used by Councils when evaluating planning applications, paragraph 7 states that the purpose of the planning system is to contribute to the achievement of sustainable development. The proposed LEA</p>	<p>See Section 4.2.5 (Environment / Climate change)</p>

REF	Organisation	Key extracts from consultation response	Additional detail
		<p>expansion does not meet the objectives set by the NPPF as it would compromise the ability of future generations to meet their own needs.</p>	
		<p>The consultation document states that LEA 'are confident that the introduction of RNP approaches will have no tangible impact on existing overall aviation noise levels or local air quality'. Given the following facts regarding the planned increases the validity of this statement is questionable.</p> <p>Current levels of noise are already unacceptable over Stillingfleet from low flying circling light aircraft and helicopters either pleasure or training. The average small jet at the local Sherburn Aero Club has a noise level of 72.9 dB (A) and are currently flying from 8'30 till sunset daily.</p> <p>The World Health Organisation recommends noise no louder than 45dB. Most of the LEA planes flying above our village create noise that is 55dB and are permitted to fly usually from dawn until sunset daily. The estimated increase in air traffic from LEA will compound this noise. The findings show that light aircraft (A) movements will increase by 30%, small jets (B/C) by 400% and large jets(D) by 100%.</p>	<p>See Section 4.2.2 (Noise / Traffic)</p>
		<p>Around 15% of the UK's climate impact comes from aviation. Expanding airports will undermine efforts to meet our legally binding commitments on climate change - we need to be slashing our emissions. Given the dangers of climate change, we need to be reducing the numbers of planes in the sky, not making space for more by expanding airports. At high altitudes, carbon dioxide has a greater warming effect than at ground level, so the impact of aviation is much greater than that from CO2 on its own. Airport expansion would cause more noise pollution and more traffic, and the economic benefits stated by the airport are not clear.</p> <p>Many of the approach roads to LEA can become quite congested and the increased traffic will only make this worse. All this traffic causes air pollution, quite apart from pollution from the aircraft themselves. It is now known that aviation produces Ultra Fine Particles (UFPs) which are even worse for humans than PM2.5 and PM10 (vehicle pollution) as they can gain more direct access to the body, especially lungs and brain. Several studies have found that aviation is a source of such particles and that the impact of major airports on air quality has been underestimated. These particles are now one of the major health concerns in relation to any airport expansion. Not only are these produced at take-off and landing but have been found 14 miles from an airport and on that basis would affect people and livestock in our parish. New research has</p>	<p>See Sections 4.2.5 (Environment / Climate change) and 4.2.6 (Economic benefits)</p>

REF	Organisation	Key extracts from consultation response	Additional detail
		<p>shown that these particles can have serious adverse health impacts even at levels lower than the current World Health Organisation guideline limits.</p>	
		<p>The proposals for the expansion of Leeds East Airport will inevitably have a severe impact on attempts to slow climate change. The significant increase in the number of flights and the increase in size of permitted aircraft will increase noise levels and pollution, especially for the inhabitants of villages like Stillingfleet under a flight path into the airport.</p>	See Section 4.2.2 (Noise / Traffic)
		<p>The airport is known to be susceptible to fog and ice due to its altitude, it has no rail connection and is served by an inadequate rural road network. It is hard to believe that this proposal could be considered 'sustainable' by the planning authorities under the terms of the NPPF. It lacks appropriate infrastructure and will increase environmental hazards.</p>	See Section 4.2.5 (Environment / Climate change)
27	Deighton Parish Council	<p>On the pages of the supporting document titled Proposed Routes – Runway 24, and Routes and Traffic, it is stated that the 'Introduction of RNP approaches will have no tangible impact on existing overall aviation noise levels or local air quality'. The graph showing movements per annum at the airfield shows projected future aircraft movements more than doubling from the 2019 baseline, with the proportion of Cat C/D aircraft also doubling, and of Cat B aircraft increasing four fold. This means that we are projected to see more than four times as many heavy jets, and eight times as many faster twins, turbo props and small jets as we do at present. These projections are in my view not consistent with the statement that there will be no tangible impact on local communities.</p> <p>At present, in our Parish, we see very few flights using the projected flightpath, one flight per hour would represent a large percentage increase in flights over our community. It was mentioned in the workshop that use of the RNP approach should be limited to bad weather, however I would suggest that since they are also to be used for training purposes that this will not be the case. Aircraft training sessions will generally be pre booked, and are likely to occur whatever the weather.</p> <p>The document states that the traffic mix using the new procedure will be predominately Cat A light aircraft. In my experience the vast majority of Cat A aircraft fly VFR, and would be far less likely to use this approach, but would usually join the airfield circuit direct. I believe that the majority of aircraft using this system will be Cat</p>	See Section 4.2.2 (Noise / Traffic)

REF	Organisation	Key extracts from consultation response	Additional detail
		<p>B, C and D larger aircraft. I also believe that the pressures that exist to train pilots for RNP approaches, would lead to a situation where every available landing slot was utilised.</p> <p>Overall, I believe that the adoption of the proposals will have a significant impact for our community with regard to noise and amenity, and that this impact has been misrepresented in the support document for this proposal.</p>	
29	Ackworth Parish Council	<p>Ackworth Parish Council have recently adopted a policy of prioritising the fight against Climate Change wherever possible. This means that we adopt a position of opposition to airport expansion as a matter of principle because of the negative impact of flights upon the environment. We feel that any development that could lead to increased air travel should be avoided and would therefore like to register our opposition to this scheme.</p>	See Section 4.2.5 (Environment / Climate change)
31	Elvington Parish Council	<p>The flightpath for all plane categories landing on runway 24 shows aircraft approaching the Elvington at a height of 3,000ft from a North westerly direction (310o) then turning once passed the village to the South West (235o) at a height of 2,300ft.</p> <p>We have asked for confirmation as to the noise levels at ground level to understand the increased noise pollution but only received details of noise levels when landing and not at the proposed flightpath altitudes.</p> <p>Given this we feel we must put forward an objection to ensure that our concerns over noise pollution are properly addressed to protect the local residents.</p>	See Section 4.2.2 (Noise / Traffic)
34	N/A	<p>Following our Parish council meeting tonight, I have one question which I would like to put forward. I have some flying experience, and have often seen on approach or joining instructions a request to avoid overflying certain villages in the locality, so my question is could a similar request not to overfly Deighton or Crockey Hill villages be included in the approach instructions for Leeds East please.</p>	IFR routes fly a specific track, designed around ICAO Doc 8168 Pans Ops. It is not possible to fly around specific points, however the designs have minimised flight over towns and villages where possible
37	N/A	<p>The risks have been reduced by the application of mitigating operating procedures to an acceptable level. Unfortunately, the EGNOS will not be available after 25 June 2021 as the UK has left the EU, therefore by increasing the number of flights into Leeds East Airport will increase the likelihood of an aircraft related accident.</p> <p>The Fallback position is using the LNAV system, which is a basic two-dimensional guidance system which should only be used in VFR (Visual Flight Rules) and is totally</p>	See Section 4.2.4 (IAP)

REF	Organisation	Key extracts from consultation response	Additional detail
		unsatisfactory for an airport in the North of England trying to operate a commercial Airline.	
		1. The approach for Runway 24 takes the aircraft directly overhead local villages including Acaster Selby and there is no circuit height reference given at this point. Obviously, the residents are concerned given the basic system that is being used to guide the aircraft.	The procedures are to enable a straight in approach to land and do not facilitate circuit flying.  Acaster Selby is in line with the runway centre line, which means a straight in approach aligned with PANS Ops placed the village underneath the approach path as has been the case since the Second World War.
		1. York area airspace is used by Light aircraft and gliders and the Rufforth York Gliding Centre have highlighted an area to the North of Appleton Roebuck as having an increased risk of a Mid-Air collision. Both York and Rufforth are used as Turning Points by gliders from many parts of the country. Yorkshire Gliding Club at Sutton Bank is also a seven-day operation.	See Section 4.2.3 (Safety)
		Leeds East Airport contacted over three hundred consultees and yet only arranged one two-hour consultation workshop for stakeholders on 14 April 1000 – 1200. I was unaware of the event and so did not attend but understand that only twelve people present at the meeting and these were mainly from the local gliding clubs and one Parish Councillor from Church Fenton. Given the importance of the matter being considered, and that the first consultation was rejected by the CAA in part because of lack of adequate consultation, I would have expected Leeds East Airport to have made extensive efforts to maximise the engagement in the consultation. Disappointingly, this has not been the case	Workshop timings were available online and details distributed to all consultees, which included all local parish councils, aviation stakeholders, district councils and MPs.  Further workshops were held following specific requests to discuss in more detail the safety risks and IAP themselves.  LEA believe the advertising of the workshops is aligned with the requirements in CAP 725
		Leeds East Airport has been submitted for consideration as a potential new settlement in the new Selby District Council Local Plan. This, along with the existing significant commercial activities on the site, appears to contradict the airports expansion plans.	See Section 4.2.1 (Process)

REF	Organisation	Key extracts from consultation response	Additional detail
		Notwithstanding this, I also understand that any intensification of the usage of the site will require planning permission	
43	N/A	I did notice that the approach line on your maps does show it going ever so slightly above/north of Ryther. However 80% of plane coming in to land at present come directly over the village, some are incredible low too!	See Section 4.2.2 (Noise / Traffic)
		This would be a major concern if more larger planes started to use the current flight path/approach.	The new IAPs are expected to bring an increase in traffic numbers and some larger aircraft as described in the consultation material.
49	N/A	a) the introduction of instrumentation to allow landings will increase the number of larger and noisier aircraft using your runways.	
		b) instrumentation will lead to landings being attempted in adverse weather and/or at night time increasing the risk to local residents.	The use of instrument approaches enables operations at night and adverse weather due to its safety characteristics. Due to lack of visual conditions, the airspace should not be used by other users during adverse weather or night time operations.  Approaches can only be used once approved, and similar approaches are used across the UK and further afield.
		c) the proposed MAP routes particularly those for Runway 24 will result in aircraft directly overflying my village of Appleton Roebuck. There is no detail of the altitude that this MAP will follow but by its very nature I would expect that an aircraft that has already overshoot its landing will be at low altitude and at high revs to attempt to recover height.	An aircraft flying a MAP is either training (in which case it would climb quickly) or not (in which case it may climb slower depending on the reason for the MAP). It is rare for an aircraft to fly a MAP outside of training.
		d) there are already expansion plans in place for Leeds Bradford Airport which is already equipped to allow instrumented landings. There is little justification for another airport with instrumentation within less than 15 minutes flying time of this existing facility.	The IAP procedures increase safety compared to visual approaches, and so are beneficial at all airports that can accommodate. Any increase in traffic at LEA is unrelated to Leeds Bradford operations.

REF	Organisation	Key extracts from consultation response	Additional detail
50	AUKFISO	<p>The regulations for Air/ Ground Communication Service (AGCS), (as provided by Leeds East using the callsign 'Fenton Radio'), or indeed an AFIS or ATC service provided elsewhere makes no provision for a transmission of information on any frequency other than that specifically allocated to the unit in question. Leeds East is allocated by CAA SARG a single frequency (126.505Mhz).</p> <p>This makes the concept of Leeds East announcing on the local gliding frequencies that an RNP approach is taking place at odds with the procedure and licensing arrangements in force. It also raises the question as to what action glider pilots listening out on the frequency may be expected to take. The Rules of the Air Regulations state that 'power-driven heavier-than-air aircraft shall give way to airships, sailplanes and balloons'. It would therefore be incumbent on aircraft flying the RNP approach to give way to gliders rather than vice-versa.</p>	<p>Our enquiries with the CAA support our proposal on this.</p> <p>The provisions will also be in accordance and agreement with the BGA requirements for use of the appropriate Sporting User frequency.</p>
		<p>Each of these IAFs are located outside of the Designated Operational Coverage area (DOC) of 10 nautical miles. Therefore if an aircraft carrying out an RNP approach is handed over to 'Fenton Radio' at / prior to the IAF then Leeds East would not be in a position to provide an AGCS to such an aircraft until it came in to the DOC area.</p>	<p>The DOC is being increased to an appropriate value.</p>
		<p>b) Whilst the normal operational hours of Leeds East fall within the normal operational hours of Leeds Bradford and Doncaster Sheffield It is unclear from the consultation document whether Leeds Bradford or Doncaster Sheffield are obliged to provide a service to aircraft undertaking an IAP at Leeds East, or whether this is to be provided on a 'best endeavours' basis. As has been seen during the Covid-19 pandemic either Leeds Bradford and/or Doncaster Sheffield could amend their operational hours, leaving Leeds East with no surveillance coverage for aircraft making an approach.</p> <p>Additionally neither Leeds Bradford or Doncaster are funded to provide Lower Airspace Radar Service (LARS) and therefore no general expectation of a service from them to traffic inbound to Leeds East could be assumed</p>	<p>There is no obligation on DSA or LBA provide a service, and they do not sequence participating aircraft to the IF.</p>
		<p>Leeds East will monitor the Pilot Aware/Atom surveillance system and announce local traffic to aircraft on the RNP approach</p>	<p>The statement in the original consultation document was in error. LEA will not be providing traffic information from such source as PilotAware/ATOM. The consultation document was updated and re-issued to correct this.</p>



REF	Organisation	Key extracts from consultation response	Additional detail
		<p>Alternative proposals:</p> <ol style="list-style-type: none"> <li>1) Leeds East continue to provide an AGCS however their agreement with Leeds and Doncaster Sheffield is reworked such that traffic is retained on the Approach/Radar frequencies of those units with traffic provided with the appropriate service until established on final and entering the Leeds East ATZ until handed over to 'Fenton Radio' – This arrangement must be available when RNP's are in use,</li> <li>2) Leeds East provide an Air Traffic Control Service making use of traditional Procedural, Radar and/ or FIDs</li> <li>3) Leeds East provide an AFIS, rather than an AGCS, making use of an approved FID with staff properly trained and regulated. AUKFISO would be pleased to assist Leeds East should they wish to examine this option in more detail.</li> </ol>	<p>Thank you for these suggestions, but LEA will retain its existing ACP proposal.</p>
56	Light Aircraft Association Vale of York Strut	<p>This consultation did not include the LAA Vale of York Strut as a consultee and it was only by chance that we became aware of this new consultation.</p> <p>...</p> <p>Consequently we believe that an adequate consultation should have at minimum also included the national representative bodies such as the Light Aircraft Association and the British Microlight Association. This appears not to be the case based upon the consultee list in the documentation – it appears the sponsors have actually aimed to restrict the group of consultees with the listing being mainly driven by airfield locations.</p> <p>Proposed procedures appear to disproportionately impact VFR airspace users The proposed IAPs are in very busy airspace and will significantly impact VFR airspace users from any of the Vale of York airfields (taken to include the airfields at Rufforth East and West and Bagby) who wish to fly North/South to either side of York, West/East from the Vale of York area to the south of Leeds/Bradford airport and North/South from the area routing to the West of Doncaster airspace.</p> <p>In addition, the areas which are compromised by the proposed IAPs are also significant corridors for VFR traffic from outside the area, transiting either East/West or North South and avoiding the controlled airspace of Leeds Bradford and Doncaster. The proposed IAPs significantly impinge upon these corridors in an unacceptable way. All these routes are used extensively by VFR traffic and yet would be substantially compromised by just one movement per hour using the proposed IAPs.</p> <p>The proposed Concept of Operations in the consultation document is insufficiently detailed and developed to allow understanding of how traffic not using the IAPs will be accommodated in the area which they cover so we have to assume that the IAPs will in</p>	<p>See Section 4.2.1 (Process)</p> <p>See Section 4.2.3 (Safety)</p>

REF	Organisation	Key extracts from consultation response	Additional detail
		<p>effect block the area which they occupy.  This is certainly how those from further afield will likely view the situation when planning flights through the area – it may be possible to reach a situation where locally based pilots are sufficiently familiar to continue to route through the area but we feel that others will simply have to assume that the procedures are in use and avoid the area.  This is not following the principle of Class G airspace being open to all and is not equitable.  The situation is caused primarily by the fact that the IAPs will be used in VFR conditions. If they were restricted to IFR conditions only, the VFR traffic would not be present.</p>	
		<p>Design of the IAPs still does not take sufficient account of other airspace users needs  The primary IAP is stated to be that for Runway 24 due to the prevailing wind.  Examination of this proposed procedure highlights that the IF (CM24I) is at 2300ft at 9.2nm from the THR yet normally accepted approach rates of descent of 300-350ft/nm (ref Skyway Code pg 73) would suggest that this IF could be at 2800 - 3200ft. The IAFs could also be higher as a result. Both measures would aid the ability for VFR traffic to operate some way below these tracks in this area.  The proposed varying of the missed approach tracks for A/B and C/D category aircraft adds undue complication since other airspace users will not know what category any aircraft falls into.  The IAP for Runway 06 has clearly been compromised due to the existing IAPs for Leeds/Bradford. This results in the proposed IAP having IAF and IFs being rather low. These effectively close off the airspace in this area to VFR traffic (which typically routes past LBA below the LBA airspace). This is not acceptable.</p>	See Section 4.2.4 (IAP)
		<p>Leeds East currently only provides an AGS (Leeds East Radio) – whilst this is clearly acceptable to the CAA as a baseline, is this acceptable as a basis for the proposed procedures considering the high levels of potential traffic in the local area?</p>	See Section 4.2.3 (Safety)
		<p>How will local VFR traffic obtain information regarding the status and use of the IAP (slots and also whether a booked slot is running to time? The principle based upon the Skyway code (pg 73) would be for all traffic within 10nm to contact the relevant ATSU but it is not clear if Leeds East Radio qualifies as an ATSU or whether this will be upgraded to a FISO service. Will there be sufficient capacity to cope with not just the traffic inbound/outbound from Leeds East but also all</p>	Pilots should call Air-Ground service and ask about traffic information, whilst also monitoring the air-ground radio as this will broadcast positions of participating aircraft

REF	Organisation	Key extracts from consultation response	Additional detail
		<p>the additional calls from VFR traffic transiting the area of the IAPs? A website publishing booked slots is not an acceptable solution especially for non local pilots.</p>	<p>LEA is not an Air Traffic Service Unit but upgrading to a FISO unit would not result in further information being provided.</p> <p>No problems are expected with radio capacity</p>
		<p>The proposed concept of operations results in the potential for transiting VFR traffic to have to work several frequencies in the immediate area as a result of the need to now contact Leeds East Radio – this will also mean aircraft changing frequency from possible local radar services including the LARs unit covering the Vale of York AIAA. This situation would be further worsened by the proposed Sherburn GNSS IAPs mentioned in this consultation document. Multiple frequency changes increase the chance of loss of overall traffic awareness for pilots transiting the area. Comment: It is not clear how two proposed Airspace Changes so close together can be considered fairly in isolation.</p>	<p>See Section 4.2.1 (Process)</p>
		<p>What consideration has been given to non-radio traffic that can currently happily operate in the affected areas? It would appear that this has not been considered and the creation of the IAPs would in effect close this airspace to non radio aircraft. This does not maintain the access to Class G for this type of traffic.</p>	<p>See Section 4.2.3 (Safety)</p>
		<p>Leeds East appears to propose to announce RNP approaches on local gliding frequencies – what is proposed for local powered VFR traffic if anything?</p>	<p>The proposal is to announce position of participating traffic. Local powered aircraft can call Fenton radio for further information</p>
		<p>As a further point, the proliferation of customised local procedures for this kind of IAP in Class G airspace is not sensible – the CAA should be establishing a Concept of Operation that can be used countrywide to ensure that all pilots are aware of what to expect at any given location. This should also cover overall RT, expanding on the information now available in Supplementary Instruction CAP 413 Radiotelephony Manual 2021/01 which does not cover all the likely radio interactions for this kind of operation – it only considers aircraft in the ATZ, GNSS IAP users and those requesting ATZ transit and ignores traffic routing in the area of the IAPs and local area.</p>	<p>This is a policy issue and not something LEA can comment on. This question should be addressed to the CAA.</p>

REF	Organisation	Key extracts from consultation response	Additional detail
57	N/A	The consultation document concerning the introduction of RNP approaches to the Leeds East Airport contains two important stated points :- The first is in the forward where it is stated 'committed to being a responsible neighbour'. The second is in the overview of the proposed routes 'to avoid built up areas where possible'.	LEA believe that these have both been achieved but also see Section 4.2.4 (IAP)
		Whenever I have spoken to LEA to report close or low direct over-flights of aircraft approaching or leaving on runway 24 I have always been met with courtesy and civility. Regretably the low over-flying of habitation still persists. Even as I write, 11.27am 15th April 2021, a relatively small twin engined jet passenger plane has taken off and flown overhead.	We ask all users of LEA to minimise flight over towns and villages, but the pilot has the ultimate responsibility to conduct the flight safely, this may at times need overflight of towns and villages
		Rarely does any aircraft either approaching or leaving this runway avoid built up areas, ie, here at Ryther village. What I fail to understand is (even if pilots use Ryther as a navigational guide) why all overfly, to some degree, the houses and gardens of Ryther?	See section 4.2.2 (Noise / Traffic)
		I have enclosed a map (1) indicating the path currently taken by the majority of aircraft approaching or leaving runway 24 (also included 1 video which represents a stock of over 50, which I have, showing the same route taken). The point I am trying to make here is that if the aircraft were to follow a direct path to runway 24 they would fly slightly North of Woodbine Grange Farm thereby fulfilling the stated wish 'to avoid built up areas where possible'. Map (2) also simultaneously fulfilling 'the wish to be a responsible neighbour'.	The RNP procedures do provide accurate lateral paths, unlike VFR approaches that are generally manually flown and could be more affected by winds.
		On Saturday the 20th February 2021 two separate incidents involving passenger jet aircraft occurred, one in Denver, Colorado, USA the other in Meerson, Holland. Engine parts fell on both sites causing damage. The one in Holland resulting in both damage and injury.	
		The presentation given in Ryther Village Hall on May 13 2019 does not fill me confidence as to the seriousness of LEA to take noise and safety concerns of residents into consideration. When I voiced my concerns about overflying and the flight path of aircraft to and from runway 24 the presenters' glib remark being " Ryther was built in the wrong place".	See section 4.2.2 (Noise / Traffic)
		If this new guidance system addresses the problem and guides aircraft along the direct path to the runway North of the village of Ryther the consultation will have confirmed it's purported sincerity.	See section 4.2.2 (Noise / Traffic)

REF	Organisation	Key extracts from consultation response	Additional detail
58	Barkston Ash Parish Council	<p>This technical CAA application should not be divorced from the wider planning context. Our understanding is that Keith Dawson, Selby' former Chief Planning Officer had the view that LEA could be used for private flights within the established use of the site but that further "intensification" (his word) for example to include commercial flights which are now happening - would need planning permission. This proposal to allow landing in all weathers would significantly increase the number of flights, passenger numbers, the size of planes and introduce night flying represents such an intensification. This is in addition to the commercial executive helicopter service you already provide, the flight school you are planning to host and the additional planes that will use the air field when you have refurbished the extra runways. All this will increase noise air and traffic pollution and we think addition planning permission should be sought to stop the exponential, unregulated growth of air port activities.</p>	See section 4.2.2 (Noise / Traffic)
		<p><b>CONSULTATION : LACK OF PUBLIC ENGAGEMENT AND TRANSPARENCY</b>  LEA had contacted over 300 consultees, mainly parish councils but has only arranged one consultation workshop for stakeholders which and this was only attended by 12 people. This is wholly inadequate with a proposal of this significance which needs maximum public engagement and consultation. Most people know little or nothing about it and the consultation document is opaque and technical with poor quality maps. This contradicts CAA document CAP1616 Part 3 Airspace information:  "474. When a change is identified, information about it should be made available in an accessible form which the layperson can understand, to help provide context as to why the noise effects they are experiencing may be changing".</p>	See Section 4.2.1 (Process)
		<p><b>INTENSIFICATION OF USE NEEDING FULL PLANNING</b>  Please see the point above. In addition, how does this proposal alongside significant commercial activities fit in with LEA's submission as a potential new settlement in the Selby District?</p>	See Section 4.2.1 (Process)
		<p>What demand analysis has been done for the increase in flights, especially in light of Covid and changing working and leisure habits? How many flights a day will there be during what hours? What size of planes? What expansion plans will you have if the proposal proceeds?</p>	See Section 4.2.2 (Noise / Traffic)
		<p><b>ENVIRONMENTAL IMPACT</b>  Has there been a full environmental impact assessment carried out which allows the public to effectively take part in decision making? This includes the full quantified and assessed cumulative emissions, including non CO2 effects at altitude, from inbound and</p>	See Section 4.2.5 (Environment / Climate change)

REF	Organisation	Key extracts from consultation response	Additional detail
		<p>outbound flights.</p> <p>We fundamentally challenge the assertion that these proposals will not significantly increase either noise or pollution because of the “high level of existing local aviation “ and “ no tangible impact on existing overall aviation noise levels or local air quality”. How does expanding flights not contribute to a cumulative increase in green house gases? This proposal takes no account of the climate emergency and government targets to reduce emissions by 78% by 2035.</p> <p>Carbon emissions from private jets rose by 31% in 2005-19 with private aviation rebounding to pre-pandemic levels by August 2020, when 60% of public flights were grounded. Travelling by private jet is the most polluting activity an individual can undertake with four hours of flying equivalent to the total annual emissions of the average European citizen. Clearly an electronic system that will enable aircraft to land in all weathers will increase flights, fill this gap in the market and maximise profits in a market that is set to increase by 50% between 2020-2030. There is talk of a ticket tax on private jet users to fund the acceleration of zero carbon technology but we are clearly some way off from that.</p>	
		<p><b>NOISE IMPACT AND RELATED PUBLIC HEALTH ISSUES</b></p> <p>The airport traffic is already very noisy with a noticeable recent increase in large low flying planes and helicopters. Noise is one of the main adverse environmental effects. It is a very serious concern of the local community which should carry heavy weight in this decision. We are particularly concerned about the use of night flights. Under RAF control, these were tightly controlled and time limited for training purposes only. The proposal contravenes the UK Aviation Policy Framework of 2013 which “expects the aviation industry to make extra efforts to reduce or mitigate noise from night flights”. Why are these needed at all when flights can be made during the day? We know noise is a psychological stressor and can effect both physical and mental health. It can affect children’s learning.</p> <p>Your proposed flight plans overfly primary and nursery settings in both Church Fenton and Barkston Ash. Homes and schools do not have adequate noise insulation to mitigate this pollution.</p>	See Section 4.2.2 (Noise / Traffic)
		<p><b>OVERALL IMPACT ON THE LOCAL COMMUNITY - HUMAN RIGHTS OBLIGATIONS</b></p> <p>The proposed development will have negative impacts on local residents. Flight paths will be directly over our villages. In particular night flying will have negative noise and emission impacts. There will be negative traffic impacts.</p>	LEA does not consider the ACP will breach Human Rights but the process to assess it has been defined by the

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		Article 8 of the European Convention on Human Rights which applies in the UK “entails a positive obligation on public authorities to protect individuals from environmental harms and risks”. This proposal does not offer such protection.	CAA which needs to consider all relevant statutory requirements.
		ECONOMIC BENEFITS What economic impact assessment has been done? What tangible benefits of having an executive travel hub bring to the ordinary residents affected by the proposal? How can these be fairly weighed against the demonstrable harms the proposal will bring. There is no prestige or kudos in “being on the map” for all the wrong reasons. It is significant that the decision on expanding Leeds Bradford Airport is being paused and reviewed by the Secretary of State.	See Section 4.2.6 (Economic benefits)
		LOCAL TRANSPORT The proposal will increase local traffic through local villages. This has already happened with the increase of heavy lorries through Ulleskelf from the existing commercial activities at LEA. This technical proposal cannot be divorced from the wider planning context. It represents a serious intensification of activity and requires proper planning consideration and wide consultation. The consultation has been opaque and has not transparently engaged the affected communities.	See Section 4.2.2 (Noise / Traffic)
59	N/A	As residents of Barkston we were not consulted, there were no leaflets, posters or public meetings.	See Section 4.2.1 (Process)
		We are already suffering with noise pollution from the planes and helicopters that overfly our village. I understand that you currently host Aware, a commercial pilot training company and operate commercial light aircraft and helicopters from your airfield	See Section 4.2.2 (Noise / Traffic)
		Your application to the Civil Aviation Authority to install a guided landing system will allow an increasing number of potentially larger planes to land in all weathers 24 hours per day. This serious intensification of activity will further increase, noise, air and traffic pollution in a time of climate crisis with new low approach flight paths directly over Barkston Ash.	See Section 4.2.2 (Noise / Traffic)
		We think it needs proper planning consultation, community engagement and consent by Selby District Council because of these wider implications, serious impact on local communities and potential for further development	See Section 4.2.1 (Process) and 4.2.2 (Noise / Traffic)
60	N/A	This is destroying our lives and causing disruption in our school and causing lots of anxiety for residents in the immediate area	See Section 4.2.2 (Noise / Traffic)

REF	Organisation	Key extracts from consultation response	Additional detail
61	N/A	<p>This technical CAA application should not be divorced from the wider planning context. Our understanding is that Keith Dawson, Selby' former Chief Planning Officer had the view that LEA could be used for private flights within the established use of the site but that further "intensification" (his word) for example to include commercial flights which are now happening - would need planning permission. This proposal to allow landing in all weathers would significantly increase the number of flights, passenger numbers, the size of planes and introduce night flying represents such an intensification. This is in addition to the commercial executive helicopter service you already provide, the flight school you are planning to host and the additional planes that will use the air field when you have refurbished the extra runways. All this will increase noise air and traffic pollution and we think addition planning permission should be sought to stop the exponential, unregulated growth of air port activities.</p>	See Section 4.2.2 (Noise / Traffic)
		<p>LEA had contacted over 300 consultees, mainly parish councils but has only arranged one consultation workshop for stakeholders which and this was only attended by 12 people. This is wholly inadequate with a proposal of this significance which needs maximum public engagement and consultation. Most people know little or nothing about it and the consultation document is opaque and technical with poor quality maps. This contradicts CAA document CAP1616 Part 3 Airspace information:</p> <p>"474. When a change is identified, information about it should be made available in an accessible form which the layperson can understand, to help provide context as to why the noise effects they are experiencing may be changing".</p>	See Section 4.2.1 (Process)
		<p>Please see the point above. In addition, how does this proposal alongside significant commercial activities fit in with LEA's submission as a potential new settlement in the Selby District?</p> <p>What demand analysis has been done for the increase in flights, especially in light of Covid and changing working and leisure habits? How many flights a day will there be during what hours? What size of planes? What expansion plans will you have if the proposal proceeds?</p> <p>On 1 July 2020, the Chief Economist of the International Air Transport Association showing "corporate travel will be weak and consumer confidence is weak, meaning leisure travel will be slow to recover". The IATA press release (7 July 2020) quoted its Director General saying "many airlines are not planning for demand to return to 2019 levels until 2023-4".</p>	See Section 4.2.2 (Noise / Traffic)



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		<p>Has there been a full environmental impact assessment carried out which allows the public to effectively take part in decision making? This includes the full quantified and assessed cumulative emissions, including non CO2 effects at altitude, from inbound and outbound flights.</p> <p>We fundamentally challenge the assertion that these proposals will not significantly increase either noise or pollution because of the “high level of existing local aviation “ and “ no tangible impact on existing overall aviation noise levels or local air quality”. How does expanding flights not contribute to a cumulative increase in green house gases? This proposal takes no account of the climate emergency and government targets to reduce emissions by 78% by 2035.</p> <p>Carbon emissions from private jets rose by 31% in 2005-19 with private aviation rebounding to pre-pandemic levels by August 2020, when 60% of public flights were grounded. Travelling by private jet is the most polluting activity an individual can undertake with four hours of flying equivalent to the total annual emissions of the average European citizen. Clearly an electronic system that will enable aircraft to land in all weathers will increase flights, fill this gap in the market and maximise profits in a market that is set to increase by 50% between 2020-2030. There is talk of a ticket tax on private jet users to fund the acceleration of zero carbon technology but we are clearly some way off from that.</p>	See Section 4.2.5 (Environment / Climate change)
		<p>The airport traffic is already very noisy with a noticeable recent increase in large low flying planes and helicopters. Noise is one of the main adverse environmental effects. It is a very serious concern of the local community which should carry heavy weight in this decision. We are particularly concerned about the use of night flights. Under RAF control, these were tightly controlled and time limited for training purposes only. The proposal contravenes the UK Aviation Policy Framework of 2013 which “expects the aviation industry to make extra efforts to reduce or mitigate noise from night flights”. Why are these needed at all when flights can be made during the day? We know noise is a psychological stressor and can effect both physical and mental health. It can affect children’s learning.</p> <p>“Several studies have shown neighbourhood noise can have a negative impact on physical and mental health in adults, and one study found...it is associated with conduct</p>	See Section 4.2.2 (Noise / Traffic)

REF	Organisation	Key extracts from consultation response	Additional detail
		<p>problems and hyperactivity in children”.</p> <p>Annual Report of the Chief Medical Officer 2017 Health Impacts of All Pollution.</p> <p>Your proposed flight plans overfly primary and nursery settings in both Church Fenton and Barkston Ash. Homes and schools do not have adequate noise insulation to mitigate this pollution.</p>	
		<p>The proposed development will have negative impacts on local residents. Flight paths will be directly over our villages. In particular night flying will have negative noise and emission impacts. There will be negative traffic impacts.</p> <p>Article 8 of the European Convention on Human Rights which applies in the UK “entails a positive obligation on public authorities to protect individuals from environmental harms and risks”. This proposal does not offer such protection.</p>	See Section 4.2.2 (Noise / Traffic)
		<p>What economic impact assessment has been done? What tangible benefits of having an executive travel hub bring to the ordinary residents affected by the proposal? How can these be fairly weighed against the demonstrable harms the proposal will bring. There is no prestige or kudos in “being on the map” for all the wrong reasons. It is significant that the decision on expanding Leeds Bradford Airport is being paused and reviewed by the Secretary of State.</p>	See Section 4.2.6 (Economic benefits)
		<p>The proposal will increase local traffic through local villages. This has already happened with the increase of heavy lorries through Ulleskelf from the existing commercial activities at LEA.</p>	See Section 4.2.2 (Noise / Traffic)
63	N/A	<p>We have not officially been informed of this consultation exercise nor have we seen any leaflets, flyers or posters.</p>	See Section 4.2.1 (Process)
		<p>We understand that this system will allow an increasing number of potentially larger planes to land in all weathers up to 24 hours a day.</p>	See Section 4.2.2 (Noise / Traffic)
		<p>If this goes ahead it will further increase noise, air and traffic pollution in a time of climate crisis with new low approach flight paths directly over Scarthingwell and Barkston Ash. We think it needs proper planning consultation, community engagement and consent by Selby District Council because of these wider implications and serious impact on local communities.</p>	See Section 4.2.2 (Noise / Traffic)

REF	Organisation	Key extracts from consultation response	Additional detail
64	N/A	I object to the application to the Civil Aviation Authority to install a guided landing system. This will allow an increasing number of potentially larger planes to land in all weathers, every hour, up to 24 hours a day.	See Section 4.2.2 (Noise / Traffic)
		Public consultation and engagement have been inadequate, with many residents ignorant of the plans.	See Section 4.2.1 (Process)
		This serious intensification of activity will increase noise and air traffic pollution in a time of climate crisis, with new low approach flight paths directly over Barkston Ash. I think it needs proper Planning consultation, community engagement and consent by Selby District Council because of these wider implications, serious impact on local communities and potential for further development of airport activity.	See Section 4.2.2 (Noise / Traffic)
65	N/A	The residents of Barkston Ash haven't been extended the courtesy of any form of information regarding these plans.	See Section 4.2.1 (Process)
		The noise has increased noticeably in recent months, fuelling suspicions that commercial activity is expanding exponentially. In view of these concerns we feel that a formal planning consultation, community engagement and consent by Selby District Council should be sought.	See Section 4.2.2 (Noise / Traffic)
		When Church Fenton Airfield was an RAF training base the local communities were treated with great consideration, most importantly by limiting night flying exercises to the hours before eleven o'clock.	See Section 4.2.2 (Noise / Traffic)
66	N/A	I object to the application to the Civil Aviation Authority to install a guided landing system. This will allow an increasing number of potentially larger planes to land in all weathers, every hour, up to 24 hours a day.	See Section 4.2.2 (Noise / Traffic)
		Public consultation and engagement have been inadequate, with many residents ignorant of the plans.	See Section 4.2.1 (Process)
		This serious intensification of activity will increase noise and air traffic pollution in a time of climate crisis, with new low approach flight paths directly over Barkston Ash. I think it needs proper Planning consultation, community engagement and consent by Selby District Council because of these wider implications, serious impact on local communities and potential for further development of airport activity.	See Section 4.2.2 (Noise / Traffic)

REF	Organisation	Key extracts from consultation response	Additional detail
67	N/A	As a resident of Barkston Ash I am directly impacted as aircraft over fly my property, at a lower level than is detailed in the documentation, yet I, nor my neighbours have not been contacted for consultation. While I understand that the consultation is closed I have not been consulted despite the direct impact. It is not unreasonable to have done so.	See Section 4.2.1 (Process)
		I would also like to understand that while the consultation states that this is not about expansion the document details a doubling of movements to over 11,000 per annum which is a significant expansion but also a proportional increase in larger types of aircraft.	See Section 4.2.2 (Noise / Traffic)
		While the RAF was in residence the community was informed and flight times were communicated to residents. This consultation has sadly failed to engage with the community and I request a wider consultation. I request that consultation is reopened.	See Section 4.2.1 (Process)
70	N/A	I live in Barkston Ash and have recently noticed an increase in larger aircraft and low flying aircraft flying directly over my property, and note that the approach the aircraft are following has changed. These are intrusive, so plans to further increase air traffic is a huge concern for local residents.	See Section 4.2.2 (Noise / Traffic)
		Public consultation and engagement has certainly been inadequate, as a resident of Barkston Ash I was completely ignorant of these plans until June 25th.	See Section 4.2.1 (Process)
		I have significant concerns about the plans to increase the executive and business travel hub, the opening of a flying school and the intention increase light aircraft activity by opening more runways.	The flying school is already operational and there are no proposals to open any more runways
		I object to the application by the CAA to install a guided landing system as it will allow larger planes to land in all weathers and potentially 24 hours a day.	See Section 4.2.2 (Noise / Traffic)
		This serious intensification of activity will increase noise, air and traffic pollution in a time of climate crisis with new low approach flight paths directly over Barkston Ash. I think this needs proper planning consultation, community engagement and consent from Selby District Council because of these wider implications, serious impact on local communities and the potential for further development of airport activity.	See Section 4.2.2 (Noise / Traffic)
71	N/A	I live in Barkston Ash and have recently noticed an increase in larger aircraft and low flying aircraft flying directly over my property, and note that the approach the aircraft are following has changed. These are intrusive, so plans to further increase air traffic is a huge concern for local residents.	See Section 4.2.2 (Noise / Traffic)
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		I have significant concerns about the plans to increase the executive and business travel hub, the opening of a flying school and the intention increase light aircraft activity by opening more runways.	The flying school is already operational and there are no proposals to open any more runways
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		This serious intensification of activity will increase noise, air and traffic pollution in a time of climate crisis with new low approach flight paths directly over Barkston Ash. I think this needs proper planning consultation, community engagement and consent from Selby District Council because of these wider implications, serious impact on local communities and the potential for further development of airport activity.	See Section 4.2.2 (Noise / Traffic)