

CAA AIRSPACE CHANGE DECISION

INTRODUCTION OF LANDS END AIRPORT GNSS RNAV INSTRUMENT APPROACH PROCEDURES

Organisation proposing the change: Lands End Airport Isles of Scilly Steamship Company (ISSC).

Date of Airspace Change Proposal: 30 November 2015

Documents considered by the CAA:

- Airspace Change Proposal dated 30th November 2015
- Consultation Report dated 4th November 2015
- CAA Operational Assessment
- CAA Consultation Assessment
- CAA Environmental Assessment

1. INTRODUCTION

2. In line with current UK policy and the Future Airspace Strategy (FAS) initiative, on 2 Dec 15 Lands End Airport, on behalf of the Isles of Scilly Steamship Company (ISSC) submitted an Airspace Change Proposal (ACP) to the CAA following a statutory shortened 8-week consultation period. The proposal aims to introduce GNSS (RNAV) Instrument Approach Procedures (IAPs) to all runways as the final part of a major investment programme to improve the year-round operational resilience of its services.
3. The introduction of GNSS (RNAV) IAPs aligns with government policy to reduce reliance on ground-based navigation aids and provides more accurate navigation guidance to help minimise the number of people affected by direct over-flight.

4. INFORMATION THAT HAS BEEN CONSIDERED

5. In making a decision, the CAA has considered a number of documents including the sponsor's consultation document, the change sponsor's ACP and the CAA's Operational Report, Consultation Report and Environmental Analysis. These documents will all be published on the CAA's website shortly.

6. PROPOSAL OVERVIEW

7. Lands End Airport, as Sponsor, proposed the introduction of GNSS (RNAV) IAPs for all Runways 16, 25 and 34. The GNSS (RNAV) IAP for Rwy 07 is positioned wholly overseas and has been introduced separately as outlined in CAP 1122, the framework for the introduction of IAPs at airfields without an Instrument Runway.
8. The ACP considered 2 main options: Do nothing, or develop new GNSS (RNAV) IAPs. A number of designs were considered for the procedures and the holds prior to the publication of the final proposal. It was assessed that the 'do nothing' option would perpetuate a number of disbenefits to the Isles of Scilly population in the following areas: lifeline services, tourism industry, essential and emergency supplies, an alternative to the summer ferry service, medical appointments and emergencies requiring treatment on the mainland.

9. CONSULTATION

10. The Sponsor undertook an 8-week public consultation (18 Aug - 12 Oct 15) and a consultation with aviation stakeholders through NATMAC. The Stakeholder Consultation Document will be published on the CAA's website shortly.
11. Additionally, the CAA's Safety and Airspace Regulation Group (SARG) has conducted its own assessment of the consultation. This assessment will also be published on the CAA's website shortly. The CAA concludes that the Consultation Report and associated material met CAA requirements.

12. Sponsors must conduct their consultation exercise in accordance with the criteria set out in the Cabinet Office's Consultation Principles (2013 Update).
13. The CAA has carefully considered this information and is satisfied that the consultation was conducted in accordance with the requirements of CAPs 724 and 725. This was a well-run consultation and the Sponsor demonstrated a willingness to engage with the various stakeholders in order to mitigate the issues raised.
14. **STATUTORY DUTIES**
15. The CAA's statutory duties are set out in Section 70 of the Transport Act 2000 (the Act), the CAA (Air Navigation) Directions 2001, as varied in 2004 (the Directions), and Guidance to the CAA on Environmental Objectives relating to the exercise of its air navigation functions.¹
16. In summary, the CAA's primary duty under section 70(1) of the Act requires that the CAA exercises its air navigation functions so as to maintain a high standard of safety in the provision of air traffic services. This duty takes priority over the remaining factors set out in section 70(2). Where an airspace change proposal satisfies all of the factors identified in section 70(2) and where there is no conflict between those factors, the CAA will, subject to exceptional circumstances, approve the airspace change proposal. Where an airspace change proposal satisfies some of the factors in section 70(2) but not others, this is referred to as a conflict within the meaning of section 70(3). In the event of a conflict, the CAA will apply the material considerations in the manner it thinks is reasonable having regard to them as a whole. The CAA will give greater weight to material considerations that require it to "secure" something than to those that require it to "satisfy" or "facilitate". The CAA regards the term to "take account of" as meaning that the material consideration in question may or may not be applicable in a particular case and the weight the CAA will place on such material considerations will depend heavily on the circumstances of the individual case. The analysis of my statutory duties is set out below.
17. **Safety**
18. The CAA's primary duty is to maintain a high standard of safety in the provision of air traffic services and this takes primacy over all other duties.²
19. In this respect, the CAA recognises that introduction of these procedures introduces an additional level of safety by providing instrument approach procedures where none previously existed. The introduction of these procedures will not introduce any additional risk as existing airspace constructs remain the same.
20. **The most efficient use of airspace**
21. The CAA is required to secure the most efficient use of the airspace consistent with the safe operation of aircraft and the expeditious flow of air traffic.³ The CAA considers that the most efficient use of airspace is defined as:

"The most aircraft movements through a given volume of airspace over a period of time in order to make best use of the limited resource of UK airspace from a whole system perspective."
22. In this respect the CAA is confident that the introduction of GNSS (RNAV) IAPs will also have a positive impact on efficiency as these procedures provide an alternative approach option that might prevent a go-around, associated delays and possibly diversions in poor weather conditions.
23. **Requirements of aircraft operators and owners**
24. The CAA is required to satisfy the requirements of operators and owners of all classes of aircraft.⁴
25. In this respect the CAA is content that all operators will be able to take advantage of these new procedures if their aircraft are suitably equipped. Those aircraft not yet fitted with RNAV compatible

¹ Revised in 2014 by the DfT (the Guidance).

² Transport Act 2000, Section 70(1).

³ Transport Act 2000, Section 70(2)(a).

⁴ Transport Act 2000, Section 70(2)(b).

equipment will still be able to conduct visual approaches. Additionally, the introduction of these procedures provides a training opportunity for those carrying RNAV compatible equipment.

26. The CAA's Operational Assessment will be published on the CAA's website shortly.

27. Interests of any other person

28. The CAA is required to take account of the interests of any person (other than an owner or operator of an aircraft) in relation to the use of any particular airspace or the use of airspace generally. The CAA examined a number of anticipated impacts, but no negative comment was received during the consultation process outlined above.

29. In this respect, the CAA is content that the consultation exercise attracted a range of diverse comments and no objections were highlighted. The CAA is also content that the impact of noise has been considered and the introduction of GNSS (RNAV) IAPs will, over time, minimise the numbers of people affected by direct overflight in line with governmental guidelines. The CAA and Lands End Airport considered an offset final approach track to avoid overflight of St Just. However, on examination the controlling obstacle dictated such an approach would not offer any significant operational advantage (reduced OCH) and would add an unnecessary level of complexity to the approach.

30. Guidance on environmental objectives

31. In performing its statutory duties, the CAA is obliged to take account of the extant guidance provided by the Secretary of State,⁵ namely the 2014 Guidance to the CAA on Environmental Objectives. Additionally, where a proposed PBN SID represents the replication of a conventional SID, it is the CAA's policy that further environmental requirements apply.⁶

32. The Environmental Research and Consultancy Department (ERCD) has undertaken an assessment of the environmental impact of this change, the findings of which will be published on the CAA's website.

33. Having carefully considered this information the CAA has concluded that, whilst any environmental benefits cannot currently be proven, this change is unlikely to have a negative overall environmental impact in the longer term and there is no reason to disagree with this proposal on environmental grounds.

34. Integrated operation of Air Traffic Services (ATS)

35. The CAA is required to facilitate the integrated operation of air traffic services provided by or on behalf of the Armed Forces of the Crown and other ATS.⁷

36. In this respect, the CAA is content that this proposal and its associated implementation will not change either the dimensions or class of local airspace structures. There will therefore be no impact in this regard.

37. Interests of national security

38. The CAA is required to take into account the impact any airspace change may have upon matters of national security.⁸ There are no implications for national security.

39. International obligations

40. The CAA is required to take into account any international obligations entered into by the UK and notified by the Secretary of State.⁹

41. In this respect the CAA is content that there are no international obligations as a result of the introduction of these procedures.

⁵ Transport Act 2000, Section 70(2)(d)

⁶ See the CAA's Guidance on PBN SID Replication for Conventional SID Replacement (paragraph 10)

⁷ Transport Act 2000, Section 70(2)(e).

⁸ Transport Act 2000, Section 70(2)(f).

⁹ Transport Act 2000, Section 70(2)(g).

42. **No conflicts**

43. In accordance with section 70(3) of the Act and the CAA published policy, the CAA is required to consider whether the airspace change proposal produces any conflicts between the material considerations identified in section 70(2). For the reasons given above, the CAA does not consider there is any conflict between the factors that must be considered.

44. **REGULATORY DECISION**

45. The CAA is content that the proposed airspace design is safe, which satisfies the primary statutory duty. For the reasons given above, the CAA is also content that the proposed change has a positive or neutral impact on each of the other factors identified in section 70(2) of the Act. In such situations, and in the absence of exceptional circumstances, it is CAA policy to approve the airspace change proposal. There are no exceptional circumstances in this case to justify departing from the CAA's standard practice.

46. The CAA has therefore decided to support the implementation of GNSS (RNAV) IAPs at Lands End Airport subject to successful completion of the design assessment by SARG IFP Procedure Designers and the safety case assessments by SARG Aerodromes.

47. It is currently estimated that the procedures will become effective from (AIRAC 9/2016) promulgated via a double AIRAC cycle on 18 Aug 16. If you have any queries, the SARG Project Leader, may be contacted on [REDACTED], or via email: [REDACTED].

48. In accordance with our standard procedures, the implications of the change will be reviewed after one full year of operation, at which point the CAA will engage with the affected parties to obtain feedback and data to contribute to this analysis.

Date: 30th March 2016
Civil Aviation Authority