## LEA ACP clarification questions

This note provides answers to clarification questions that have been received regarding the Leeds East Airport (LEA) Airspace Change Proposal (ACP). It is to help clarify the proposed change and the consultation process as a result of any questions that we have received. It does not contain the consultation responses.

This note contains clarifications to questions received to 20 April 2021 and will be updated again during the consultation period.

## 1. Questions received 13 Mar 21

1. The consultee objected to the intended procedure to 'monitor the Pilot Aware/Atom surveillance system and announce local traffic to aircraft on the RNP approach' because this is not approved by the CAA.

## LEA response

The consultation document was incorrect, and this statement was an error. Consequently, the consultation material was updated by removing this statement and re-published.

## 2. Questions received 11 Mar 21

"1. Other than this consultation document have you contacted / presented the introduction of the new procedures in any other way to the local community? e.g. formal / informal letter or comms."

## **LEA response**

Other than in the consultation document, the new procedures have not been presented to the local community. However, various development procedures have been discussed with several local stakeholders. We will be holding an on-line event on Wednesday 14th April 2021 at 10.00 am at this link:



Please inform us if you intend to join so we can update you in case there is a need to change the link. If you send questions in advance, we will attempt to address them in the workshop.

"2. Can you clarify the movements please?"

## LEA response

A movement is counted as either a take-off or landing. So generally, 50 visiting aircraft would create 100 movements.

## "2.1 When is the Estimated Future Date?"

## LEA response

Like many businesses predicting the future post Covid-19 is very difficult and we do not have a specific year when we expect full recovery. Our aspiration is to grow our business but recognise recovery could take a long time.

"2.2 Can you give access to the actual movement figures? I have assumed 2019 movements are approx 5100 increasing to 11000 at that future date."

## LEA response

Recent movements at Leeds East are: 2019: 5274 2020: 4318 2021: 29 to end January, estimated 30 in February.

"2.3 Can you clarify the aircraft categories by type please? Cat A, Cat B, Cat C/D?"

## LEA response

This classification relates to the speed at which different a/c types fly during their final approach to land. It helps Instrument Approach Procedure Designers work out the radius of turns for instance. This link gives more details <a href="https://www.skybrary.aero/index.php/Approach">https://www.skybrary.aero/index.php/Approach</a> Speed Categorisation

"3. Maybe it's me :) but I am not sure how the proposed slot process will work? One movement per hour on RNP to a maximum of 8 at LEA. Does that mean the other 22 movements per day will be existing arrival procedures for all types or will CAT C/D movements only use RNP?"

## LEA response

All aircraft arriving at LEA must seek prior permission. Those wishing to use the RNP instrument approach will be issued with a slot if one is available. During this period no other aircraft can use the instrument approach procedure. Aircraft requesting permission to arrive not needing the RNP Instrument approach can arrive at any time we are open except during an actual RNP approach.

"4. Will any runway or apron developments or upgrades be required?"

# LEA response

No. None are required nor planned.

"5. Will the airfield boundary fence/security be upgraded for larger aircraft types?"

## LEA response

No, the current airfield perimeter is satisfactory.

"6. What will be the future airport opening hours?"

## LEA response

We have no plans to change the airport's opening hours.

## 3. Questions received 16 Mar 21

 "It was noted from the minutes of the Framework Briefing (26/10/2016) that a design consideration was that the approaches should be "specifically designed to avoid large conurbations and airfields; Breighton, Burn, Full Sutton, Pocklington, Rufforth and Sherburn". However, the proposal is to introduce new Instrument Approach Procedures (IAPs), Missed Approach Procedures (MAPs), including routes and associated procedures, in the proximity of the three local and active gliding clubs mentioned. They have the potential to impact their day-to-day operations (and their ability to carry them out safely), and therefore also their businesses.

What risks have LEA identified that they are introducing in association with this consequence and how do they intend to mitigate them?"

## **LEA response**

The safety assessments that support ACPs, including any identified risks, are not placed into the public domain. They are proprietary to the sponsor and are submitted to the CAA as part of the formal process submission after the consultation is complete. The CAA will then assess the acceptability of the submission, including the safety elements, in making its decision to approve or not the airspace change.

One aim of the consultation is to identify risks and issues that the sponsor may not have been aware of. Consultees are encouraged to submit particular concerns they may have for the specific proposal and it will be the sponsor's responsibility to address these. The consultation report, produced by the sponsor after the end of the consultation period and submitted to the CAA, will describe the sponsor's response to these.

Consultees are therefore welcome to identify specific risks of concern to them in the consultation response. The on-line workshop on 14 April will be an opportunity to raise some of these concerns.

Regarding the requirement to 'specifically designed to avoid large conurbations and airfields' – we believe that the current design achieves this.

2. "The proposal is to introduce new IAPs, MAPs and associated procedures, across the route of a major north/south, south/north cross-country gliding 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 positions of the proposed routes are in close proximity 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 "funnelling in" to the corridor.

What risks have LEA identified that they are introducing in association with this consequence and how do they intend to mitigate them?"

## LEA response

See response to question 1.

3. "The proposal is to introduce new IAPs and MAPs, in close proximity to similar IAPs and MAPs proposed to be introduced to a similar timeframe at Sherburn Aero Club. It is intended that the procedures associated with the management and use of these routes are shared between LEA and SAC. When looked at collectively, these proposed routes and their associated procedures compound the consequences identified at 1 and 2 above.

What additional and/or collective risks (including human factors risks) have LEA and SAC identified they are introducing as a result of the proximity of their proposed new routes and how do they intend to mitigate them?

Given their collective impact why are these proposals not being consulted on jointly?"

#### LEA response

See response to question 1.

The additional risks, including human factors risks, posed by LEA and SAC proximity is an example of a specific issue that can be raised by a consultee.

The decision not to link LEA and SAC consultations was taken by the CAA and the ACP sponsors. The CAA determined that the SAC change did not require consultation unlike the LEA one. Even though they are being progressed separately, risks or issues arising from their interdependencies need to be considered, as illustrated above.

4. "The local gliding and motor gliding community has had sight of the ongoing development of proposals for the LEA (and SAC) IAPs and MAPs and notes that, despite the consequences identified, which the clubs have already articulated to LEA (and SAC), with the exception of minor alterations the route designs have not changed significantly. We are aware of alternative methods of or approaches to route design, some of which have already been implemented at UK airfields, which could be used to reduce the impact and consequences identified but we see no evidence that LEA (or SAC) have looked at alternative approaches.

Can LEA (and SAC) demonstrate how the fullest range of route design options have been used to eradicate or at least minimise the consequences identified in 1 to 3 above?

Can LEA (and SAC) justify their proposed IAPs and MAPs considering there are alternatives with potentially less impact on GA including gliding traffic?"

## **LEA response**

The route design has been prepared by LEA's APDO (Approved Procedure Design Organisation) and using their experience to comply with ICAO/CAA requirements.

The alternative methods implemented at UK airfields are not clear from the question and LEA would welcome specific information on these design alternatives.

5. "We note that under "Operational Procedures" conditions are described, some of which restrict the use of those procedures to limit the impact on local gliding clubs. These address only a small portion of the consequences to the local gliding community introduced by the proposed LEA (and SAC) IAPs and MAPs and which have already been articulated by the clubs to LEA (and SAC),

Can LEA (and SAC) demonstrate how their operational procedures and any conditions applied to them will contribute to eradicating or at least minimising the consequences identified in 1 to 3 above."

## LEA response

See response to question 1.

Regarding information already articulated to LEA: As stated in the consultation document, due to staff changes, not all records of previous engagement are available to LEA and this consultation anyway has differences from previously consulted materials. Therefore, LEA request that consultees re-submit any material that they consider relevant to this proposal and not rely on previous consultation submissions.

6. "We note that, unlike SAC, 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 into an area of Class G airspace where potentially high numbers of VFR GA (including gliding) traffic is operating.

What risks, including human factors risks, have LEA identified that they are introducing in association with this consequence and how do they intend to mitigate them?"

**LEA response** See response to question 1.

#### Below here are additional Q&A added in V2

4. Question received 24 Mar 21

Good day, please could you tell me to what effect the new approaches would effect large model aircraft flying at Elvington airfield, we would normally be operating up to around 2,000 ft AGL.

#### **LEA response**

Aircraft on the RNP approaches will be about 2,000ft at Elvington. Therefore, a coordination will be required with the model aircraft club. Leeds East will contact the club to discuss this.

#### 5. Questions received 3 Apr 21

We have extracted the questions from this letter as follows:

 We fail to understand why risks which are being created through the introduction of LEA's proposed new procedures and which LEA is very much aware will impact the wider aviation community are not shared with that wider community as part of the consultation process.

#### **LEA response**

We will hold another workshop to allow risks and mitigations to be discussed. Details will be circulated to the participants.

2) You state that "risks or issues arising from their interdependencies [*LEA AND SAC*] need to be considered, as illustrated" but you do not identify what they are nor do you illustrate how you have considered or addressed them.

#### **LEA response**

We will address these in the risks workshop described above.

3) We would have, at the very least, expected LEA to have required their APDO to examine all appropriate design possibilities to minimise the impact of LEA's proposal on the local aviation community; a stated aim of the proposal. It is not clear from your response above if or how that has been done.

#### **LEA response**

LEA have worked with the procedure designers to minimise risk and impact with local stakeholders. We will hold another procedure design workshop (separate to

the risks workshop described above) to allow the procedure design to be discussed. Details will be circulated to the participants.

4) The attached BowTie diagram shows the potential hazards that LEA's proposal introduces as identified by the clubs we represent. We need to understand how LEA intend to mitigate those risks to enable us to see your proposal in the round before we can formulate considered responses to it. If LEA are unable to provide us with those answers, we are willing, as a group, to engage with its representatives to have full and frank discussions about these risks and their mitigations to try to ensure mutual acceptability of the proposal.

## **LEA response**

We are grateful for the offer to hold a meeting and the BowTie diagrams. As mentioned above will set up a workshop on risks and mitigations propose to discuss the diagrams there. We will ensure the identified risks are added to our analysis, if they are not already present, before we submit it to the CAA.

#### 6. Questions received 13 Apr 21

1) Can you please provide us with the current flightpaths and heights for traffic landing on Runway 24 so we can differentiate the current & proposed procedures?

#### **LEA response**

Presently there are no defined routes for a/c landing at LEA. It is normal practice to line up with the landing runway and to navigate to that position using a visual circuit. This is described in the UK AIP EGCM AD 2.22 FLIGHT PROCEDURES:

*"Circuit Procedures* 

Aircraft taking off, 'going around' or making 'touch and go' landings may be subject to noise procedures as instructed by Tower. Circuit direction: Runway 24 and 34 right hand; Runways 06 and 16 left hand. Fixed wing circuit height 1000 FT QNH. Helicopters circuit height 700 FT QNH."

 According to the document aircraft will be flying over Elvington at 2,300ft, what noise will be generated at ground level from the proposed categories of aircraft (Cat A-D) so as we can understand whether this will cause a nuisance to the residents?

## LEA response

The following table shows noise levels from FAA and EASA data for some aircraft (examples of CAT A - D) on approach (ie when landing). The figures show the relative loudness of the different aircraft:

Piper PA28	61.0 dB	CAT A
Pilatus PC- 12	73.2 dB	CAT B
Cessna Conquest II	76.5 dB	CAT B
Canadair 604 Challenger	80.4 dB	CAT C
Boeing B737/Airbus A320	85.0 dB	CAT C (Some are CAT D)
Boeing B747	90.0 dB	CAT D

3) Although we appreciate you say that Cat B-D aircraft will form only a minority of the landings on Runway 24, what are the future plans for the airport inc any forecasted aircraft numbers over the next 5-15 years as we assume you wish to increase the number of daily flights to increase income so this will obviously necessitate increased noise and pollution?

## LEA response

The number of aircraft using the new procedure is limited to 1 arrival per hour as described in the consultation document. There are no plans to increase the number of larger aircraft beyond what is in the consultation document. More detail on the numbers is given below.

4) Have any other routes been considered not using Elvington as a waypoint, and if so why were these not actioned?

#### **LEA response**

We have looked at multiple options and the Procedure Designer (who sets the aircraft track) has made several modifications to minimise the impact as best we can.

Due to the limitations imposed on the Procedure Designer by international standards for the lengths of each segment of an instrument approach along with the need to establish on a Final Approach Fix, the defined route cannot be varied.

One leg in the original design (before previous consultations) started over Full Sutton and this has already been deleted to remove the impact of aircraft joining in this area.

5) You may not be aware but in the York local plan there is a new housing settlement (Site ST15) of approx. 3,340 houses to be built on part of the former Elvington airfield, see attached plan, given this would this make a difference to the consultation and the proposed flightpaths?

#### **LEA response**

We are aware of this proposal but understand that no decisions have been taken at this time.

## 7. Questions received prior to the workshop on 14 Apr 21

1) 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.

#### LEA response

The RNP procedures are fixed tracks over the ground and the pilots should not deviate from them.

The track passes to the NW of Deighton. The procedures use GPS and are flown very accurately, hence they would not be expected to fly over the village



The Final Approach Fix CM24F is shown below.



At this late stage of the approach aircraft will be fully established and lateral deviation from the track is very unlikely.

2) Tell me to what effect the new approaches would effect large model aircraft flying at Elvington airfield, we would normally be operating up to around 2,000 ft AGL.

This question was covered under 4) above "Questions received on 24 Mar 21".

#### 8. Clarification question received on 14 Apr 21

1) The graphical data on page 6 shows an increase of small jets from 6% of 5,000 to 24% of 11,200 – in reality this is an increase in small jets from 300 per year to 2,700 per year. This is a significant shift in the size and volume of aircrafts using the LEA airfield. Please could we have a copy of the data in tabular format for this graph so that we can see clearly the increases in volume and size of aircraft from the proposals so that we do not misquote in our consultation response?

#### **LEA response**

The additional movements due to RNP approaches assumes 16 extra movements per day, ie 1 arrival and 1 departure per hour for 8 hours a day, each day of the year (8x2x365 = 5840 movements).

The figures assume 3% of arrivals on the new approach will be CAT C/D (175) aircraft, 40% CAT B (2,336) and the rest CAT A (3,329).

				Total	
Aircraft type	2019 actuals		RNP approach	(2019 + RNP approach)	
	Movements	%	New movements	Movements	%
CAT C/D	71	1%	175	246	2%
CAT B	314	6%	2,336	2,650	24%
CAT A	4,889	93%	3,329	8,218	<b>76</b> %
Total	5,274		5,840	10,868	

The following table summarises the figures.

Note that although 365 days/year are used in the calculations, Leeds East airport is not open on some days such as Christmas.

2) Is it possible to have this information drilled down to a "daily increase" from/to of volume of aircraft and also by type of aircraft?

#### LEA response

The average daily increase is shown below.

Aircraft type	Extra arrivals/day	Extra departures/day	Extra movements/day
CAT C/D	0.24	0.24	0.48
CAT B	3.20	3.20	6.50
CAT A	4.56	4.56	9.12
Total	8	8	16

3) Can you please explain how this consultation has been shared with local parishioners in Church Fenton and Ulleskelf Parishes - other than through the Parish Council.

#### **LEA response**

The consultation has been shared through Parish and District councils as well as parliamentary representatives and aviation stakeholders. Contacts from the previous consultations have been included.

4) [Do you have] any benchmark data on number/type of aircraft from the era of 20 years ago (1999/2000) to compare with 2019/2020 figures so that it is obvious to parishioners how this compares with present day figures?

## LEA response

Unfortunately, we don't have any information on aircraft numbers and type from 20 years ago.