



## Introduction of PBN Approaches at the City of Derry Airport

### ACP-2018-52

## Consultation Strategy

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| <b>Authors</b>        | Trax International Ltd, City of Derry Airport                   |

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## 1. Introduction

## 1.1 Purpose of this document

- 1.1.1 The purpose of this document is to detail City of Derry's (CoDA) strategy to ensure an effective consultation on the Introduction of PBN Approaches airspace change proposal [ACP-2018-52](#). It outlines CoDA's approach to the consultation and how we intend to engage our stakeholders.
- 1.1.2 For a consultation to be effective, those who are consulted should be able to base their views on a reasonable understanding of the situation, clear information about what is proposed, the potential impact of the changes on them and be able to express their views and have confidence that their views will inform the final proposal.
- 1.1.3 In this document CoDA outlines the engagement activity previously undertaken during Stages 1 and 2 of the CAP1616 process and details the strategy for the Stage 3C consultation.
- 1.1.4 CAP1616 provides guidance on the areas which this consultation must cover<sup>1</sup>:
- Audience: outlining which stakeholders are likely to be impacted, both positively and negatively; information needs of stakeholders; considerations for seldom-heard groups.
  - Approach: detailing how the audience will be informed of the consultation and how CoDA will ensure all stakeholders are able to respond effectively; response to unexpected events and challenges; timetable of consultation events; extension and contingency plans where appropriate.
  - Materials: detail how stakeholders will be provided with information to ensure they understand the issues and potential impacts of the proposal; how supporting and technical materials will be developed to suit a range of audiences and be accessible.
  - Length: provide the start/end dates of the consultation and confirm its length.
  - Post-Consultation: a summary of what will happen post-consultation and next steps.

## 1.2 Background on this airspace change proposal

- 1.2.1 City of Derry Airport (CoDA) is located seven miles northeast of Derry/Londonderry and serves as a main gateway for the entire Northwest of Ireland. It provides a vital air access link for the local community and performs a pivotal role in the economics of the region.
- 1.2.2 The past decade has seen a revolution in the European aviation market; 'Open Skies', globalisation and the advent of low-cost carriers resulted in a proliferation of air travel. The low-cost model has provided a safe and affordable alternative to the traditional full-service carriers, opening up the market to a new generation of traveller. CoDA has benefited from this proliferation and now provides an essential link to the UK and Ireland. It is expected that the recent downturn caused by the COVID-19 pandemic will recover and therefore the long-term demand facing the sector is expected to remain.

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<sup>1</sup> [CAP1616 Appendix C, Table C1, page 182](#)

1.2.3 CoDA is undertaking an Airspace Change Proposal (ACP) to introduce satellite-based approach procedures which will utilise Performance Based Navigation (PBN), meet the governments [Airspace Modernisation Strategy](#) (AMS), and provide a contingency for the existing ground based navigational aid infrastructure. As part of this ACP, CoDA is proposing the following:

- To introduce satellite-based (PBN) approaches to RWY 08 & RWY 26.
- To introduce satellite-based (PBN) direct arrival procedures to compliment the above.
- To introduce satellite-based (PBN) Missed Approach Procedures, Aircraft Holds and holding procedures.

1.2.4 As much as possible, the aim is to design PBN approaches and arrival procedures to replicate the existing routes which would result in little or no noticeable change to stakeholders.

### 1.3 Objectives of this consultation

1.3.1 It is recommended in CAP1616 that change sponsors be aware of the Gunning principles when developing a consultation strategy<sup>2</sup>:

- Consultation should occur when proposals are at a formative stage,
- The consultation should give sufficient reasons for any proposal to permit intelligent consideration,
- The consultation should allow adequate time for consideration and response,
- The product of consultation must be conscientiously taken into account.

1.3.2 The fundamental principles of effective consultation are targeting the right audience, communicating in a way that suits them and giving them the tools to make informative, valuable contributions to the proposal's development.

1.3.3 CoDA's objectives for an effective consultation are:

- To ensure that all stakeholders can learn about how we have developed airspace change options and understand the options that are being taken forward to Stage 3 for consultation.
- To ensure that stakeholders are aware that the aim of this proposal is to design PBN approaches and arrival procedures which replicate existing routes, so that there is little or noticeable change.
- To provide sufficient and comprehensive information, whilst being transparent and accessible, to enable informed stakeholder response to our consultation.

## 2. Summary of ACP to date

2.1.1 The CoDA Airspace Change Proposal is required to follow the CAP1616 process. Table 1 below summarises the CAP1616 stages already undertaken for this ACP and

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<sup>2</sup> [CAP1616 Appendix C, C31-C32, page 181](#)



the stage where we are at now, providing links to previous submission documents with further information.

| Airspace Change Stage  | Summary  | Link to Documents<br><small>(Also available on the <a href="#">ACP portal</a>)</small>         |
|------------------------|--|--|
| <p><b>Stage 1A</b></p> | <p>CoDA submitted a statement of need (SoN) to the CAA. The SoN explained that aircraft currently operate using the Instrument Landing System (ILS) when arriving at Derry and this is a ground based navigational system. CoDA would like to introduce satellite based PBN approach procedures for contingency purposes that, as far as practicable, replicate the existing procedures at EGAE.</p> <p>To ensure that the required contingencies are available, CoDA intends to introduce GNSS approach procedures (now known as RNP Approach) to both Runway 26 and Runway 08 as follows:</p> <ul style="list-style-type: none"> <li>• Introduction of PBN approaches to RWY 08 and RWY 26;</li> <li>• Introduction of PBN direct arrival procedures to compliment the above;</li> <li>• Introduction of PBN Missed Approach Procedures, Aircraft Holds and holding procedures.</li> </ul> | <p><a href="#">Full Statement of Need</a></p>  |
|                        | <p>CoDA participated in an assessment meeting with the CAA on the 20<sup>th</sup> March 2019 as part of Step 1A of the CAP1616 process. The purpose of the assessment meeting is for the change sponsor to present and discuss their SoN and to enable the CAA to consider whether the proposal falls within the scope of the formal airspace change process.</p>  | <p><a href="#">Assessment meeting minutes</a></p>  |
| <p><b>Stage 1B</b></p> | <p>At Stage 1B CoDA developed a set of design principles with identified Stakeholders.</p> <p>The aim of the design principles is to provide high-level criteria that the proposed airspace design options should meet. They also provide a means of analysing the impact of different design options and a framework for choosing between or prioritising options.</p> <p>The final design principles outlined within the Stage 1B submission were given a priority order, as this will help with the comparison of different design options developed at Stage 2 of the ACP process.</p>   | <p><a href="#">Stage 1B Design Principles Submission Report</a></p>                            |
| <p><b>Stage 2A</b></p> | <p>Stage 2A requires change sponsors to develop and assess options for the airspace change.</p> <p>In Stage 2A, the change sponsor develops a comprehensive list of options that address the Statement of Need and that align with the design principles from Stage 1.</p> <p>We then shared those options with our Stakeholder</p>  | <p><a href="#">Stage 2A Submission</a></p> <p><a href="#">Design Principles Evaluation</a></p> |

|                        |  |  |
|------------------------|--|--|
|                        | <p>representatives (the same ones engaged with on the Design Principles). Feedback from the engagement was then used to generate further options where feasible.</p> <p>Finally, we qualitatively assessed all options developed against the Design Principles and produced a Design Principles Evaluation.</p>  |  |
| <p><b>Stage 2B</b></p> | <p>Stage 2B requires the change sponsor to carry out an ‘Initial’ appraisal of the impacts of each of the viable options identified in Stage 2A. The Initial appraisal should, as a minimum, contain qualitative assessments of the different options and highlight to stakeholders and the CAA the relative differences between the impacts, both positive and negative of each option.</p> <p>The CAA’s assessment of the Initial Options Appraisal carried out by CoDA is available <a href="#">here</a>.</p> | <p><a href="#">Initial Options Appraisal</a></p>           |
| <p><b>Stage 3A</b></p> | <p>Stage 3A, is where the change sponsor is required to plan for a consultation and engagement by preparing a Consultation Strategy, Consultation documents and a Full Options Appraisal (FOA).</p> <p>This is where we currently are.</p>   | <p>Consultation Document</p> <p>Full Options Appraisal</p> |

Table 1:CoDA ACP to date



### 3. Audience

#### 3.1 Identifying the Audience

- 3.1.1 The following local organisations and stakeholder groups have been engaged throughout the ACP to date and CoDA intends to promote the consultation to these specific groups. These lists include the Chairman of the Airport Consultative Committee, local district councils and environmental bodies, major airlines operating at CoDA, corporate aviation stakeholders, local aerodromes and local airspace users.
- 3.1.2 Throughout the ACP CoDA has involved the National Air Traffic Management Committee (NATMAC) and the Ministry of Defence (MOD) and sought their feedback. These organisations will also be informed of the consultation prior the start date and invited to respond.
- 3.1.3 The consultation will also be open to the wider public online, via Citizen Space and the CAA Portal. More details can be found in Section 4.

#### *Aviation Industry*

3.1.4 The following Industry based stakeholders were identified at Stage 1 and 2:

| Name                     | Organisation/Representing                     |
|--------------------------|---|
| ██████████               | Loganair                                      |
| ██████████               | Ryanair                                       |
| ██████████               | City of Derry Air Traffic Control             |
| ██████████               | City of Derry Airport Managing Director       |
|                          | NetJets                                       |
|                          | XclusiveJet                                   |
|                          | Universal                                     |
|                          | Air Routing International                     |
|                          | Globeair AG                                   |
|                          | 2 Excel Aviation                              |
| ██████████<br>██████████ | Irish Aviation Authority                      |
| ██████████               | Causeway Airfield                             |
| ██████████               | Ballykelly Aerodrome                          |
| ██████████               | PDG Aviation Services                         |
| ██████████ (Chairman)    | CoDA Airport Transport Consultative Committee |

Table 2: Industry Stakeholders

### National Air Traffic Management Committee (NATMAC)

- 3.1.5 NATMAC is a non-statutory advisory board sponsored by the Safety and Airspace Regulation Group (SARG). The committee is consulted for advice and views on any major matter concerned with airspace management. NATMAC is to assist SARG in the development of airspace policies, configurations, and procedures in order that due attention is given to the various requirements of all users of the United Kingdom airspace, civil and military.

| NATMAC Committee Members   |  |
|--|--|
| Airlines UK  | Airspace4All                                   |
| Airport Operators Association  | Airfield Operators Group                       |
| Aircraft Owners & Pilots Association                                     | Airspace Change Organising Group               |
| Association of Remotely Piloted Aircraft Systems UK                      | Aviation Environment Federation                |
| British Airways  | Bae Systems                                    |
| British Airline Pilots Association                                       | British Balloon & Airship Club                 |
| British Business & General Aviation Association                          | British Gliding Association                    |
| British Helicopter Association   | British Hang Gliding & Paragliding Association |
| British Microlight Aircraft Association/ General Aviation Safety Council | British Model Flying Association               |
| British Skydiving  | Drone Major                                    |
| General Aviation Alliance  | Guild of Air Traffic Control Officers          |
| Honourable Company of Air Pilots   | Helicopter Club of Great Britain               |
| Heavy Airlines   | Iprosurv                                       |
| Isle of Man CAA  | Light Aircraft Association                     |
| Low Fare Airlines  | Military Aviation Authority                    |
| Ministry of Defence – Defence Airspace & Air Traffic Management          | NATS   |
| Navy Command HQ  | PPL/IR (Europe)                                |
| UK Airprox Board   | UK Flight Safety Committee                     |



|                                |  |
|--------------------------------|--|
| United States Air Force Europe |  |
|--------------------------------|--|

Table 3: NATMAC Organisations

*CoDA Based GA & other Airspace Users*

3.1.6 The General Aviation community is a large user of CoDA and the surrounding airspace. This list stakeholders engaged during Stages 1 and 2 and 3 new stakeholders who have either joined the local organisations or been identified since the start of this ACP.

| Name       | Organisation/Representing |
|------------|---------------------------|
| [REDACTED] | CoDA based GA             |
| [REDACTED] | CoDA based GA             |
| [REDACTED] | CoDA based GA             |
| [REDACTED] | CoDA based GA             |
| [REDACTED] | CoDA based GA             |
| [REDACTED] | CoDA based GA             |
| [REDACTED] | CoDA based GA             |
| [REDACTED] | CoDA based GA             |
| [REDACTED] | CoDA based GA             |
| [REDACTED] | CoDA based GA             |
| [REDACTED] | CoDA based GA             |
| [REDACTED] | CoDA based GA             |
| [REDACTED] | CoDA based GA             |
| [REDACTED] | Cutting Edge Helicopters  |
| [REDACTED] | Skydive Wild Geese        |
| [REDACTED] | Ulster Gliding Club       |
| [REDACTED] | Eglinton Flying Club      |
| [REDACTED] | CoDA based GA             |
| [REDACTED] | Northern Light Aviation   |
| [REDACTED] | CoDA based GA             |

Table 4: GA Stakeholders

*Additional Stakeholders*

3.1.7 During Stages 1 and 2 CoDA identified other stakeholders who will have an interest in any changes being made to the airspace, including the Ministry of Defence (MOD), the

<sup>3</sup> New GA stakeholder

<sup>4</sup> New GA stakeholder

<sup>5</sup> New GA stakeholder

local councils, and organisations involved in the management of the nearby Areas of Outstanding Natural Beauty (AONBs).

| Name       | Organisation/Representing  |
|------------|--|
| ██████████ | MOD (Danger Area 505)  |
| ██████████ | Derry City & Strabane District Council (DC&SDC)  |
| ██████████ | DC&SDC Head of Planning  |
| ██████████ | DC&SDC   |
| ██████████ | DC&SDC   |
| ██████████ | DC&SDC   |
| ██████████ | DC&SDC   |
| ██████████ | Causeway Coast & Glens Borough Council   |
| ██████████ | Department of Agriculture, Environment & Rural Affairs (Northern Ireland)                            |
| ██████████ | Natural Environment Division, Countryside, Coast & Landscape Unit (Northern Ireland)                 |
| ██████████ | Natural Environment Division, Countryside, Coast & Landscape Unit (Northern Ireland)                 |
| ██████████ | Natural Environment Division, Countryside, Coast & Landscape Unit (Northern Ireland)                 |
| ██████████ | Director of Economic Development, Emergency Services and Information Systems, Donegal County Council |
| ██████████ | Head of Economic Development, Donegal County Council   |

Table 5: Other identified stakeholders

### 3.2 Cross-border/ Irish Aviation Authority

- 3.2.1 Following the Stage 2 Gateway, the CAA required us to engage with the IAA around the assessment of our Airspace Change Options across the border, and whether there were any additional requirements outside of CAP1616 that the IAA would require us to review.
- 3.2.2 We have reviewed IAA documentation and cannot find any evidence of any additional requirements outside of those already outlined in CAP1616 and therefore we have progressed with the Full Options Appraisal. The IAA will be contacted as a stakeholder prior to the start of the consultation and will be offered an online session if requested.
- 3.2.3 Copies of our correspondence to the IAA are available in Appendix A.

### 3.3 Seldom-heard audiences

- 3.3.1 CAP1616 states that the consultation strategy must cover “who may be affected, positively or negatively, by the change and what their information needs are (including consideration of any seldom-heard audiences).<sup>6</sup>
- 3.3.2 The ICCAN toolkit discusses the importance of identifying and understanding sections of the community who may have difficulty engaging with the consultation and who might find some of the proposed activities challenging.
- 3.3.3 This airspace change proposal is seeking to replicate the traffic patterns which exist today and will not result in an increased amount of traffic arriving or departing at the airport.
- 3.3.4 Our FOA has demonstrated that there will be no significant impact to stakeholders on the ground.
- 3.3.5 The main stakeholder groups to be affected by this ACP are aviation/industry-based organisations and these will be specifically targeted prior to the consultation. However, the wider public will be informed of this consultation and welcomed to respond, for more information on how CoDA intends to reach all stakeholders please see Section 4 of this document.

### 3.4 Information needs of stakeholders

- 3.4.1 CoDA’s aim is to ensure that all impacted stakeholders can participate in the consultation in a meaningful way.
- 3.4.2 CoDA recognises that this is a technical airspace change proposal and believes that the stakeholders who are most interested in and who will respond to this consultation will have an industry/aviation background.
- 3.4.3 To ensure that the proposal and the process is fully understood CoDA intends to provide a range of consultation material that will be suited to all the different stakeholders. More information on this can be found in Section 4.5.1 of this document.
- 3.4.4 The consultation material will be supplemented by the ability to attend online events or to ask any further questions via the email address, [coda-acp@traxinternational.co.uk](mailto:coda-acp@traxinternational.co.uk).

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<sup>6</sup> [CAP1616 Page 49, Para 167](#)

## 4. Approach

### 4.1 Notification of Consultees

- 4.1.1 CoDA will notify existing stakeholders (outlined in section 3.1) of the consultation via email, following a successful result at the CONSULT gateway. They will be informed of the consultation start and finish dates and how they are able to respond.
- 4.1.2 The wider public will be notified of the consultation via social media posts on the CoDA's LinkedIn, Twitter, Facebook, and Instagram sites. There will also be a section added to the CoDA website.
- 4.1.3 To ensure the wider public are aware of the consultation and how they can respond, adverts will be placed in the online sections and in paper copies of the following newspapers. These will be placed at the start and the mid-point of the consultation.
- Derry Journal
  - Londonderry Sentinel
  - Strabane Chronicle
  - Donegal Democrat
  - Coleraine Chronicle

### 4.2 Advertising and Publicity

- 4.2.1 Notification of the consultation will take place as outlined in section 4.1. During the consultation CoDA will use social media to advertise the consultation at the mid-point. Local newspapers will also be utilised as outlined in section 4.1.
- 4.2.2 The online events proposed in section 4.3.2-4.3.3 will also be advertised on social media prior to them taking place.
- 4.2.3 The CoDA website will have a section on the consultation, directing people to Citizen Space throughout the consultation period.
- 4.2.4 Existing stakeholders will be emailed, and social media posts will be made, to remind consultees of the consultation deadline. This will take place approximately 2 weeks prior to the close of the consultation.

### 4.3 Method of Consultation

- 4.3.1 CoDA have made the decision that this consultation will be held online only. This is due to the scale of the airspace change, which our FOA has demonstrated does not significantly impact stakeholders on the ground. Also, as stated in section 3.4 we anticipate the majority of stakeholders who will respond to this consultation will be part of the aviation industry and therefore may not be local to the area.
- 4.3.2 Through our targeted emails, social media posts and newspaper adverts consultees will be directed to the Citizen Space portal to read the consultation material and respond to the consultation.

- 4.3.3 Two online events/Q&A sessions will take place via TEAMS during the consultation, where CoDA representatives provide an online briefing of the summary consultation documents, with the majority of time set aside for a Q&A session with stakeholders.
- 4.3.4 These will be approximately 1hr 30mins in length and take place towards the start and the mid-point of the consultation. Proposed dates are;
- 3 November 2021
  - 9 December 2021
- 4.3.5 Specific dates and timings of online events will be highlighted in the emails sent out to existing stakeholders, promoted on social media, the CODA website and in the newspaper advertisements.
- 4.3.6 Consultees will be advised to book a place at the online event by sending an email to [coda-acp@traxinternational.co.uk](mailto:coda-acp@traxinternational.co.uk).
- 4.3.7 The CoDA website and the newspaper adverts will contain details of how consultees can request paper-copies of the consultation material, how they are able to respond via non-online methods and details of the online events.
- 4.3.8 Consultees will be able to request paper-copies by phone or by post.
- Telephone: 0287 181 0784
  - Postal Address:  
FAO: ATS Manager  
City of Derry Airport  
Airport Road  
Eglinton  
Co. Derry  
BT47 3GY
- 4.3.9 Consultation material will also contain the email address [coda-acp@traxinternational.co.uk](mailto:coda-acp@traxinternational.co.uk) which will be monitored throughout the consultation for consultees to ask any questions, request additional online sessions or request hard copies of any consultation material.

#### 4.4 How we will encourage responses

- 4.4.1 For existing stakeholders, CoDA will send notification emails prior to the start of the consultation and a follow up at the mid-point, to encourage responses.
- 4.4.2 Social media, the CoDA website and adverts in the local newspapers will be used to encourage the wider public to respond. Posts will be sent at the start of the consultation, to advertise online events and at the consultation mid-point.
- 4.4.3 If there are further requests for online/Q&A events from consultees, CoDA will identify dates/times and will offer additional sessions if required. These will be promoted on social media.
- 4.4.4 Approximately 2 weeks prior to the end of the consultation, existing stakeholders will be emailed, and social media posts will be made, to remind consultees of the approaching consultation deadline.

## 4.5 Contingency Planning

- 4.5.1 As the consultation is taking place via mainly online methods, it is not anticipated that any resurgence of the COVID-19 pandemic would have an impact on the consultation.

## 5. Materials

### 5.1 Consultation Material

5.1.1 CoDA intends to have tiered consultation material for consultees to read.

| Tier | Document                            | Content   |
|------|-------------------------------------|---|
| 1    | Overview/Summary Document - General | Aimed to be a quick and easy to understand document, with diagrams for non-airspace users.  |
| 2    | Main Consultation Document          | Summary of the ACP so far, including links to documents on the CAA Portal. This will have more detail on the proposed changes and explain how CoDA have reached the final options now being consulted on. |
| 3    | Full Options Appraisal              | A link to the FOA submission, for consultees who wish to read the full technical data.  |

Table 6: Consultation Material

5.1.2 A 'Frequently Asked Questions' page will be developed for stakeholders, containing questions that arise during the consultation, either from any responses or from the online sessions. This will be updated during the consultation period as consultees respond.

5.1.3 There will be a feedback form included at the end of the Main Consultation Document. This will also be available in a hard copy on request.

### 5.2 Online Consultation

#### *Online Portal (Citizen Space)*

5.2.1 The online portal (Citizen Space) will be utilised as stated in section 4.3. The online portal will host all the information outlined in paragraphs 5.1.1-5.1.3 and links to the Stage 1 and Stage 2 submission documents.

#### *Feedback Form*

5.2.2 A feedback form will be available on the website for anyone wishing to respond in writing to the consultation. The feedback form will be a version of the information contained on Citizen Space. A copy of the feedback form is at the end of the Main Consultation Document.

5.2.3 Consultees will be required to respond to the consultation via an online form using the online portal. Any written responses received will be manually uploaded onto Citizen Space. Further details on how consultees can respond in writing will be in the consultation document.

## 6. Consultation Length

- 6.1.1 Commencing the consultation immediately after the CONSULT gateway and a standard 12-week consultation period would result in a consultation close date of 24 December 2021.
- 6.1.2 To avoid this, and to give organisations and consultees time to respond to the consultation after the traditional holiday period, CoDA is proposing to start the consultation 2 weeks after the CONSULT Gateway on Monday, 18 October 2021 and add an additional 2 weeks to the consultation.
- 6.1.3 CoDA intends to hold a 14-week consultation from Monday 18 October 2021 to Friday 21 January 2022.



## 7. Post-Consultation/Next Steps

### 7.1 Review and categorisation of responses

- 7.1.1 Following the close of the Stage 3 consultation, CoDA will collate, review, and categorise the consultation responses. Responses will be categorised into those which present information that may lead to a change in the design and those that could not.
- 7.1.2 The categorisation of responses will be reviewed by the CAA and published on the CAA Portal.

### 7.2 Next steps in the CAP1616 process

#### *Stage 4: Update & Submit*

- 7.2.1 Following the review of the responses CoDA will consider the need to update the design of the airspace change in the light of the information received during the consultation. If major modifications are required, then it may be appropriate to re-consult with stakeholders.
- 7.2.2 If CODA decides that re-consultation is not required, then they will prepare the final documentation for the submission to the CAA. The consultation response document and the Final Options Appraisal will be submitted to the CAA and published on the CAA Portal.
- 7.2.3 The full Airspace Change Proposal submission must follow the format identified in CAP1616, once finalised this document will be submitted to the CAA. We currently expect this to be in March 2022.