



LAND'S END AIRPORT

CAP 1616 – AIRSPACE CHANGE PROPOSAL

FOR THE

LAND'S END TRANSIT CORRIDOR (LETC)

-

STAGE 3 : CONSULT CONSULTATION DOCUMENT

ID : ACP-2019-75



LAND'S END AIRPORT
CONSULTATION DOCUMENT
4th January 2021 – 15th March 2020 (10 Weeks) v3.0

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Issue	Month/Year	Change Requests
1.0	Nov 2020	Draft version sent to CAA
2.0	Dec 2020	Draft v2 sent to CAA with updates
3.0	Dec 2020	Final version sent to CAA for Stage 3 Gateway

i Abbreviations & Glossary of Terms

ACAS	Airborne Collision Avoidance System	Equipment fitted to an aircraft that will provide information on other aircraft regarding range, altitude and bearing.
ACP	Airspace Change Proposal	The process by which a sponsor applies for a change to the design of a part of the UK airspace
ADS-B	Automatic Dependant Surveillance Broadcast	A way for an aircraft to determine its position via satellite navigation and periodically broadcast it, enabling it to be tracked
AIAA	Area of Intense Aerial Activity	
ATC	Air Traffic Control	
ATCA	Air Traffic Control Assistant	
ATCO	Air Traffic Control Officer	
ATCU	Air Traffic Control Unit	
ATM	Aerodrome Traffic Monitor	A type of radar used to assist in the safe operation of runways and airport utilisation
CAA	Civil Aviation Authority	The UK's aviation regulator ensuring that aviation reaches the highest safety standards
CAP	Civil Aviation Authority Publication	
CAT	Commercial Air Transport	
DP	Design Principle	
EC	Electronic Conspicuity	A means of aircraft transmitting their position to other ground or air-based systems
HEMS	Helicopter Emergency Medical Service	
GA	General Aviation	
IFR	Instrument Flight Rules	A term used to describe a pilot flying and navigating the aircraft with reference to the instruments in the flight deck
ISSC	Isles of Scilly Steamship Company	

ISSG	Isles of Scilly Steamship Group	
LETC	Land's End Transit Corridor	
MLAT	Multilateration	A navigation and surveillance technique used to provide information on the position of an aircraft
PAX	Passengers	
PINS	Point In Space	A non-precision instrument approach mainly used by helicopters
RMZ	Radio Mandatory Zone	A designated piece of airspace that requires all aircraft to be fitted with and operate suitable two-way radio equipment
RNAS	Royal Naval Air Station	
RNAV	Area Navigation	A method of navigation that allows an aircraft to choose any course within a network of navigation beacons
SAR	Search and Rescue	
TCAS	Traffic Collision Avoidance System	Suitably equipped aircraft communicate digitally, between themselves, information regarding range, altitude and bearing to provide advice on airborne collision avoidance
TMZ	Transponder Mandatory Zone	A designated piece of airspace that requires all aircraft to be fitted with and operate electronic conspicuity equipment
UK	United Kingdom	

1 Introduction

- 1.1 This document forms part of the document set required in accordance with the requirements of the CAP1616 airspace change process.
- 1.2 For previous stages of the airspace change process, including the statement of need, design principles and design options, please see the [CAA Website](#) detailing the progress of this proposal. For ease of reference a table listing the final Design Principles is included in Appendix C of this document.
- 1.3 Although many of our stakeholders are considered to be well versed in aviation matters there are also many that are not and so we plan to issue the main consultation document in plain English. A PowerPoint slideshow will be created with full information on the proposed changes and then summarising the main points, impacts and benefits of each.

2 Overview: Scope and Purpose of This Consultation

- 2.1 This airspace change proposal (ACP) is sponsored by us, Land's End Airport Ltd and supported by St Mary's Airport and Penzance Heliport who are also situated within the Land's End Transit Corridor (LETC). In this consultation document, when the term Sponsor is used, it is referring to Land's End Airport Ltd.
- 2.2 We intend to introduce a change to the LETC to improve safety standards.
- 2.3 This proposal is related to improving the safety of existing services and not about stimulating new traffic or altering any existing routes.
- 2.4 The purpose of this consultation document is to provide information to you, our stakeholders, to allow you to respond effectively. This document can be read in conjunction with the Consultation Strategy and Full Options Appraisal which outlines the consultation process.
- 2.5 We are seeking feedback from stakeholders who may be affected by the proposal. Primarily this is likely to be users of the airspace and other aviation stakeholders. Nonetheless we welcome feedback from any interested parties.
- 2.6 You have the opportunity to provide relevant feedback, which may conflict with that of other stakeholders. After the consultation has ended, we will consider all your feedback and produce the final design proposal, which may differ from those described in this document.
- 2.7 You have a crucial role in providing relevant and timely feedback to us the Sponsor in the form of your views and opinions on the impact these proposals might have on your operation, and any mitigations you might suggest, supported by evidence where possible.

- 2.8 We intend to carry out this consultation over a 10 week period, starting on the 4th January 2021 and consider this is adequate due to the mainly technical nature and the lack of environmental impact of the proposed changes.

3 Background: Why do we need a change?

- 3.1 In 2013 Land's End airport recorded almost 11,000 air traffic movements. These are flights that have landed, departed or overflown the airport and operated within the LETC. In 2019 that figure had risen to over 15,000 and before COVID, 2020 was expected to be even higher with the introduction of a new operator from Penzance Heliport. Because of the popularity of the Isles of Scilly and the key role that Land's End Airport plays in maintaining essential travel links between them and mainland UK we are forecasting a rapid return to pre-COVID traffic levels and then a continuation in the growth of air transport movements.
- 3.2 In recent years we have concluded and evidenced that there are aircraft flying within the LETC that are not in contact with an air traffic control unit. The nature of the airspace, Class G uncontrolled, means that pilots do not need to be in contact with ATC but because of the vast number of air traffic movements in the LETC, not being in contact with ATC is not the safest course of action to take. When there is unknown traffic operating in such a busy corridor of airspace the chances of aircraft coming into close proximity with one another or even having a mid-air collision, increases. Since recognizing this risk, we have been trying to identify ways to make the airspace safer for all users and since the majority of the flights in the LETC are passenger carrying for members of the public too.
- 3.3 The CAA have published an [Airspace Modernisation Strategy](#) in which they detail the ways in which airspace within the United Kingdom may be improved and modernised in line with government expectations and requirements. In this document is a section regarding uncontrolled airspace and the initiative for introducing more aircraft utilising electronic conspicuity. Aircraft carrying and operating transponders features in this initiative and so introducing a TMZ element into the LETC would not only increase safety standards but align with this strategy.
- 3.4 In conclusion then, we need a change to the LETC airspace to make things safer, to meet the needs of current and future users and to provide the best possible levels of customer service that we can offer.

4 Stakeholders

- 4.1 Stakeholders are third-party groups or individuals interested in an airspace change proposal.
- 4.2 Land's End Airport has decided to target a number of different types of organisations and stakeholders regardless of whether they are aviation orientated or otherwise. We identified several groups that wouldn't ordinarily have contact with an airport and have included them to ensure that they have an opportunity to have their voices heard

regarding any proposed change. We chose this approach because of the high-profile nature of the lifeline air link between Land's End Airport and the Isles of Scilly. We felt that it was important for as many potentially interested or effected organisations to be identified and engaged with at the earliest opportunity.

4.3 This consultation targets two groups of stakeholders: Key and Other

- Key stakeholders are those whose responses are essential
- Other stakeholders are those whose responses are welcomed

4.4 Even though there is no change to the environmental impact of aviation of any of the proposed changes we have targeted environmental organisations and have included two such as key stakeholders.

4.5 A full list of stakeholders that we have targeted so far can be found in Appendix A of this document.

4.6 For details on how to respond to this consultation see Section 10 of this document.

5 Justification and Objectives

5.1 The justification for this airspace change is that it has been identified that safety could be enhanced for all users within the LETC by making a change to the current LETC airspace.

5.2 Almost all flights to and from the Isles of Scilly occur within the existing LETC. There is a mix of commercial, general, military, charter, business, public service (HEMS, air ambulance, SAR) and recreational.

5.3 One of our greatest challenges operating within the LETC is that sometimes there are aircraft flying within it that are not in contact with air traffic control. We know they are there because of reports from other pilots or sometimes a local radar unit will see something on their screens for a short while, but no one is talking to them. This is called Unknown Traffic.

5.3 The objectives of this proposal are to

- Remove the unknown traffic element from the LETC.
- Provide the safest environment possible for all present and future users of the LETC

6 Options for Consultation

6.1 After the previous development stage of the airspace change process (Stage 2), the following options remained for progression.

- Do Nothing (Section 7) – we **do not prefer** this option because this would not remove the unknown traffic element and the risks that it poses.
- Establish an RMZ (Section 8) – we **do not prefer** this option because even though it would remove the unknown traffic element it does not provide the safest environment possible, within current limitations, nor consider the future needs of traffic operating within the LETC.
- Establish combined RMZ/TMZ (Section 9) – we **do not prefer** this option because although it removes the unknown traffic element and caters for future users of the LETC by introducing the need for electronic conspicuity within the corridor, it doesn't encompass the IAP's at Land's End and St Mary's airports within the LETC.
- Establish an RMZ and alter the size of the LETC (Section 10) - we **do not prefer** this option because even though it would remove the unknown traffic element and encompass the IAP's at Land's End and St Mary's airports, it does not provide the safest environment possible, within current limitations, nor consider the future needs of traffic operating within the LETC.
- Establish combined RMZ/TMZ and alter the size of the LETC (Section 10) – we **prefer** this option because it removes the unknown traffic element, provides the safest environment possible, within current limitations, caters for future users of the LETC by introducing the need for electronic conspicuity within the corridor and encompasses the IAP's at Land's End and St Mary's airports.

7 Current Airspace: The Do-Nothing Option

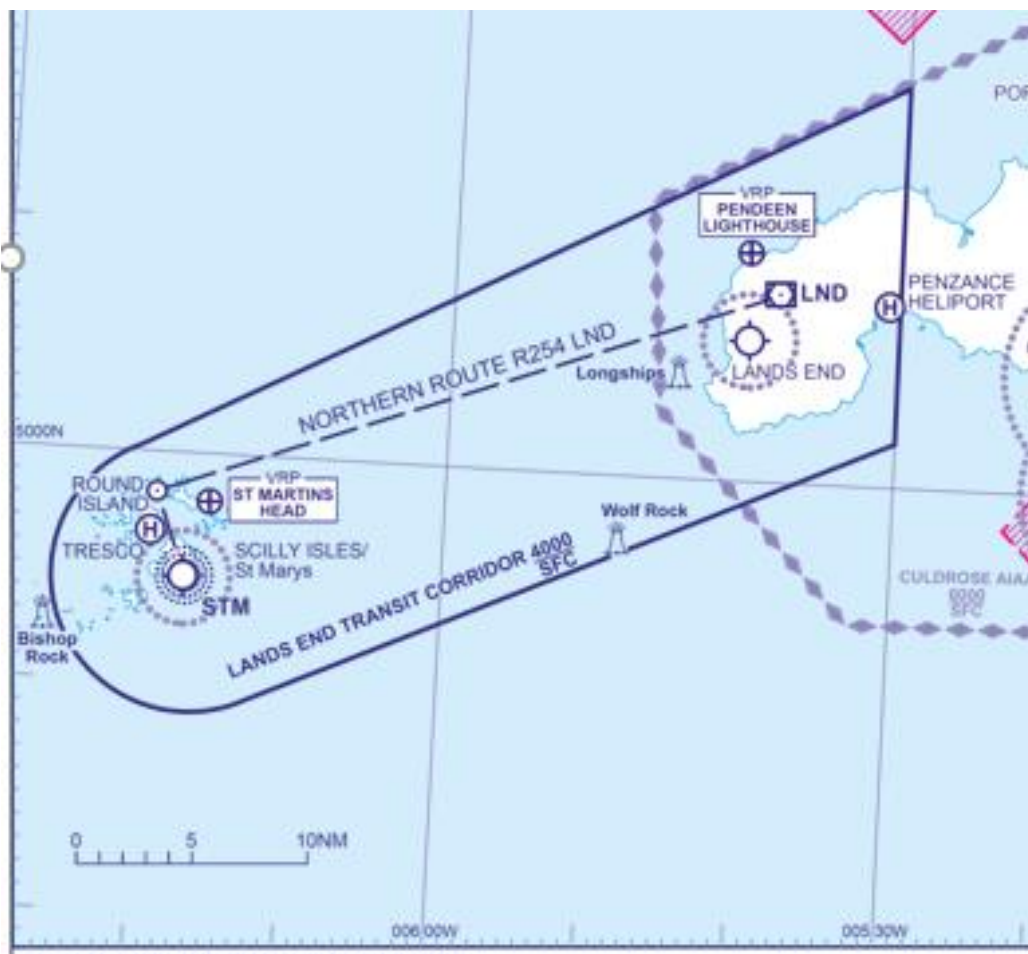


Figure 1 Current LETC Airspace
AIRAC AD 2-EGHC-3-1 Land's End Transit Corridor

- 7.1 This is the current LETC and also the do-nothing option
- 7.2 This is the base-line option that does nothing to address the unknown traffic element in the LETC and so does not meet any of the design principles.

8 Proposed Option - RMZ

- 8.1 This proposed option would mean that any aircraft wishing to operate within the LETC would have to have adequate 2-way radio equipment installed in the aircraft and establish and maintain 2-way communications with Air Traffic Control before entering the airspace.
- 8.2 The establishment of an RMZ would mean that the airspace remains Class G but also allows for enhanced situational awareness for all users and for ATC. This therefore increases safety for all aircraft flying in the LETC while imposing the minimum of impact on aircraft operations.

- 8.3 This proposal is safety related and not designed to increase the number of aircraft within the LETC so there would be no change to ATC workload, aircraft routings and the number of aircraft within the LETC.
- 8.4 There are circumstances under which certain activities take place without radio contact at present (e.g. para gliding at Sennen Cove) and with careful planning and formal agreements these activities could continue. Again, by entering into letters of agreement, aircraft could get airborne from sites within the RMZ and establish 2-way radio communication at the earliest opportunity.
- 8.5 The RMZ may not need to be active 24/7 and could be promulgated to coincide with the commercial operations of the airports/heliport within the LETC thus making the LETC as accessible as possible in line with increased safety margins.

9 Proposed Option – Combined RMZ/TMZ

- 9.1 The establishment of a TMZ would mean that the airspace remains Class G but also allows for aircraft equipped with an Airborne Collision Avoidance System (ACAS) to receive information from other aircraft to help avoid mid-air collision.
- 9.2 ACAS is an aircraft system based on Secondary Surveillance Radar (SSR) transponder signals. It interrogates the Mode C and Mode S transponders of nearby aircraft and from the replies tracks their altitude and range and issues alerts to the pilots, as appropriate. ACAS will not detect non-transponder-equipped aircraft and will not issue any resolution advice for traffic without altitude reporting transponder.
- 9.3 ACAS is increasingly common in light aircraft as well as commercial aircraft. Some of the aircraft that we know of that operate an ACAS are exemplified below
- HEMS
 - SAR
 - Some General Aviation (GA) aircraft
 - Commercial fixed wing and helicopter operators
- 9.4 This proposed option would mean that any aircraft wishing to operate within the LETC would have to have adequate 2-way radio equipment and a transponder installed in the aircraft. They must establish and maintain 2-way communications with Air Traffic Control before entering the airspace and also operate the transponder in accordance with ATC instructions or promulgated procedures.
- 9.5 Other air traffic control units equipped with surveillance equipment will be able to see all of the aircraft operating within the LETC and so their situational awareness will be enhanced and the service and information that they offer to traffic approaching the LETC will also be enhanced.

- 9.6 Currently all aircraft carrying out IAPs at Land's End airport carry a discreet transponder code and are visible on surveillance equipment and ACAS systems (there is no requirement for Land's End to verify the code just to confirm with the pilot that the code is selected and used) and so having all aircraft within the LETC doing so (different code to the IAPs) would make all airspace users visible.
- 9.7 Having both these elements combined would remove the potential of unknown traffic operating within the LETC and add another level of safety enhancement directly to the airspace users themselves.
- 9.8 A future plan of the airport is to operate UAVs for freight/cargo flights to and from Land's End Airport to the Isles of Scilly. Several companies have approached Land's End Airport with one trial successfully carried out to the Isles of Scilly earlier this month. Other trials are being undertaken with NATS Aberdeen concerning the integration of manned and unmanned aircraft. A potential future requirement of the UAVs would be that they could only integrate with manned aircraft if operating within a TMZ, and so would need conspicuity and to be electronically visible on ACAS and ground-based surveillance equipment. The TMZ element of this option would future proof the LETC for this potential requirement.
- 9.9 Just as with an RMZ there are circumstances under which certain activities take place without having a transponder equipped (e.g. para gliding at Sennen Cove) and with careful planning and formal agreements these activities could continue. Again, by entering into letters of agreement, aircraft could get airborne from sites within the RMZ/TMZ and establish 2-way radio communication at the earliest opportunity and then operate the transponder in accordance with ATC instructions or promulgated procedures.
- 9.10 The combined RMZ/TMZ may not need to be active 24/7 and could be promulgated to coincide with the commercial operations of the airports/heliport within the LETC thus making the LETC as accessible as possible in line with increased safety margins.

10 Proposed Option – Establish an RMZ and alter the size of the LETC or RMZ/TMZ and alter the size of the LETC



Figure 2 Proposed LETC airspace with increased size applied

AIRAC AD 2-EGHC-3-1 Land's End Transit Corridor

- 10.1 The proposal of either an RMZ or combined RMZ/TMZ combined with altering the size of the LETC, to encompass IAPs at both Land's End and St Mary's airports, would look the same on the airspace chart. The exact dimensions of such would be confirmed at a later date but figure 2 shows a fair representation of the proposed shape and relative size.
- 10.2 In figure 2 you can see that when the Land's End IAPs for RWY16/34 are placed on the airspace chart they protrude outside the current LETC boundary (Dark blue line). By increasing the size of the LETC all the IAPs at Land's End would be inside the LETC (Red line). This is important because aircraft carry out an instrument approach primarily when the weather is bad and so may spend some of the approach in cloud, thus needing as much protection as possible. At present the IAPs at St Mary's airport are not finalised and so are just represented on the chart but provision has been made to encompass them within the proposed size change.

11 Predicted scale of impacts and benefits

Option - RMZ			
Subject	Scale of Impact/Benefit	Evidence	Notes
Noise	None	No change to flight paths in the LETC	
Air Quality	None	No change to flight paths in the LETC	
CO2 Emissions	None	No change to the number of flights in the LETC	
Capacity	None	No expected change to ATC workload	
Access	Negligible	There may be a very small number of aircraft, estimated to be <1% that do not, or would not wish to, use 2-way radio equipment and therefore would not be permitted to enter the airspace. Neither Land's End nor St Mary's airports accept non-radio equipped aircraft to take-off or land.	Land's End airport handled 15042 air traffic movements during 2019 (Jan – Dec). ATC did not receive one telephone request to operate a non-radio aircraft within the LETC during that time. However due to the type of airspace there was still unknown traffic seen within the LETC
Safety	Enhanced	All aircraft would be in 2-way radio communication with ATC before entering the LETC	Unknown traffic would be eliminated from the LETC

Option – Combined RMZ/TMZ			
Subject	Scale of Impact/Benefit	Evidence	Notes
Noise	None	No change to flight paths in the LETC	
Air Quality	None	No change to flight paths in the LETC	
CO2 Emissions	None	No change to the number of flights in the LETC	
Capacity	None	No expected change to ATC workload	
Access	Negligible	<p>There may be a very small number of aircraft, estimated to be <1% that do not, or would not wish to, use 2-way radio equipment or operate a transponder and therefore would not be permitted to enter the airspace.</p> <p>Neither Land's End nor St Mary's airports accept non-radio equipped aircraft to take-off or land.</p>	Land's End airport handled 15042 air traffic movements during 2019 (Jan – Dec). ATC did not receive one telephone request to operate a non-radio aircraft within the LETC during that time. Feedback received from local stakeholders shows that the majority (90%) of locally based aircraft are transponder equipped.
Safety	Enhanced	All aircraft would be in 2-way radio communication with ATC before entering the LETC and be operating a transponder in accordance with any promulgated LETC procedures. All aircraft would be visible on radar and collision avoidance equipment in the cockpit	Unknown traffic would be eliminated from the LETC due to the operation of radio equipment and ACAS equipped aircraft would have even greater situational awareness in the LETC. Radar units will be able to see all of the aircraft operating in the LETC.

- 11.1 Above is a summary of the predicted impacts and/or benefits of the options in Sections 8, 9 and 10. For full details see Stage 3 Full Options Appraisal document on the [CAA Website](#).
- 11.2 The benefits would be for the safety of the airspace users and that's why we prefer the option of RMZ/TMZ + alter the size of the LETC. It ensures that every user is talking to air traffic control, that all aircraft are visible on collision avoidance equipment and the instrument approaches are encompassed within the LETC.

12 How to respond to this consultation

- 12.1 The consultation begins on the 4th of January 2021 and ends on the 15th of March 2021, a period of 10 weeks.
- 12.2 All our target stakeholders have been emailed a link to the consultation area of the CAA Website

- <https://consultations.airspacechange.co.uk/lands-end-airport/airspace-change-for-the-lands-end-transit-corridor>

And we expect the online survey to be the primary method of consultation and response gathering.

- 12.3 The consultation is not limited to stakeholders as anyone may respond.
- 12.4 If you need a paper copy of the consultation please write to us at the address below including a stamped, self-addressed envelope.
- 12.5 If you wish to respond on paper please send your letter recorded delivery to the address below as we do not commit to acknowledging receipt. If you require a reply please also include a stamped, self-addressed envelope.
- 12.6 POSTAL ADDRESS:

Airport Manager
2019-75 ACP
Land's End Airport
Kelynack
St Just
Penzance
Cornwall
TR197RL

- 12.7 When submitting feedback please provide the following information:
- Your name and roll if you are responding on behalf of an organization
 - Your contact details (email AND/OR postal address)
 - A feedback category: SUPPORT, NO OBJECTION, OBJECT
 - Your reasons for choosing the category above, your feedback on any impacts that options may have on your operation, how often those impact might occur, any suggested mitigations
 - Your feedback on the consultation itself
- 12.8 We have provided a feedback form suitable for handwritten postal responses – see Appendix B. This asks the exact same questions as the online survey. Online responses will have the option of uploading a supporting document – if you wish to send more information by post then please attach it to a copy of the form in Appendix B and send them to the above address in 12.6
- 12.9 All responses will be analysed, with any common themes extracted and summarized. We will monitor the consultation portal and will formally respond back to any queries, uploading FAQs if necessary.
- 12.10 All online responses go direct to the CAA who will moderate submissions. Responses will be publicly visible by being published on the CAA website. You will have the option to anonymise your online response so it is not publicly visible, but you cannot be anonymous to us or the CAA – we will need to see your name and contact details.
- 12.11 Postal responses will be scanned, redacted and uploaded to the CAA website.
- 12.12 All responses will be visible to us and the CAA.
- 12.13 If this airspace proposal does not affect your operation then please respond so. That fact itself is useful data for us and the CAA.

13 Reversion Statement

- 13.1 After the full consultation process and selection of one of the proposed change options has taken place, should the proposal be approved and implemented, it would be possible to revert to the pre-implementation state, however this would greatly affect the ATC operations of all of the ANSPs within the LETC.
- 13.2 In the unlikely event that there are unexpected issues caused by the implementation of this proposal then short notice changes could be made via NOTAM.
- 13.3 All the ANSP and air traffic service providers affected would then, in consultation with the CAA, carefully consider the next steps and future of the LETC airspace.

14 Compliance with the Airspace Change Process

- 14.1 This proposal is confirmed by the CAA as Level 2C.
- 14.2 If you have any questions or comments regarding the conduct of the airspace change process (such as adherence to the CAP1616 process), please contact the CAA. A link to the relevant page on the CAA website is [here](#). Should you have difficulty or be unable to access documents on the internet please contact Land's End Airport at the address in 12.6 above and we will endeavor to make these documents available to you. Due to current COVID-19 restrictions this can only be via pre-arranged appointment.

15 What happens next?

- 15.1 After the consultation period closes, we will analyse the feedback and publish a report summarizing the findings and how each item might affect the airspace design.
- 15.2 We will consider those findings, determine if the airspace design does need to change in light of the feedback, and publish a second report detailing the amended design (if amendment is merited).
- 15.3 Finally we will submit an Airspace Change Proposal to the CAA based on this consultation document and the feedback reports.
- 15.4 The CAA will then study the proposal to decide if it has merit and will publish a decision on its website.
- 15.5 If the CAA approves this proposal, we plan to implement the changes in the Autumn of 2021.

Appendix A

Land's End Airport Ltd

List of Targeted Stakeholders in Stages 1, 2 & 3

Stakeholders marked in red strikethrough were included in Stages 1 & 2 but have requested not to be included in stage 3 so will not be contacted further

Key Stakeholders
RNAS Culdrose
Sloane Helicopters
Environment Agency
Natural England
St Mary's Airport
Isles of Scilly Skybus
Perranporth Flying Club
PDG Helicopters
Tresco Heliport
Penzance Heliport
Newquay Cornwall Airport
Fly Newquay
Cloud 9 Hang Gliding and Paragliding Association
Cobham Aviation Services Ltd
Other Stakeholders
British Microlight Aircraft Association (BMAA)
St Just Town Council
Honourable Company of Air Pilots (HCAP)
Skybus Flight Safety Manager
Cornwall Protection of Rural England CPRE
Cornwall Council
National Trust
Duchy of Cornwall
Health Watch
Island Partnership
Derek Thomas MP
British Helicopter Association
Airprox Board
AOPA
Director of Aviation Affairs
Seahawk Gliding Club @ RNAS Culdrose
35 out of 39 NATMAC Organisations
Airlines UK

Airspace4All
Airport Operators Association – Neil Thompson
Airport Operators Association – Terry Marsden
Airfield Operators Group
Aircraft Owners and Pilots Association – George Done
Aircraft Owners and Pilots Association – Martin Robinson
Association of Remotely Piloted Aircraft Systems UK
Aviation Environment Federation
BAe Systems
British Airline Pilots Association – James Gaskell
British Airline Pilots Association – Mike Thrower
British Airline Pilots Association – Zoe Reeves
British Balloon and Airship Club
British Business and General Aviation Association
British Gliding Association
British Helicopter Association
British Hang Gliding and Paragliding Association
British Microlight Aircraft Association/general Aviation Safety Council
British Model Flying Association
British Parachute Association
General Aviation Alliance
Guild of Air Traffic Control Officers
Honourable Company of Air Pilots
Helicopter Club of Great Britain
Light Aircraft Association
Military Aviation Authority
Ministry of Defence – Defence Airspace and Air Traffic Management
NATS – Brendan Kelly
NATS – Paul Jones
Navy Command HQ
PPL/IR Europe – Group Mailbox
PPL/IR Europe – Timothy Nathan
UK Flight Safety Committee
United States Airforce Europe

Appendix B – Feedback for Postal responses

Your Name:	
Your Address:	
Postcode:	
Your email address:	
Delete one of the following boxes, as applicable	
I am responding as a private individual	I am responding on behalf of an organisation My organisation is My position in that organisation is
All responses will be published online. You may ask for your name to be published or removed. Delete one of the following boxes	
Publish my name along with my response	Remove my name before publishing my response
Please put the following in order preference E.g. Preferred option = 1, next = 2 etc	
Option 1 - changing the LETC to an RMZ	
Option 2 - changing the LETC to a Combined RMZ/TMZ	
Option 3 - changing to an RMZ and altering the size of the LETC	
Option 4 - changing to a Combined RMZ/TMZ and altering the size of the LETC	

What are your reasons for providing the above responses? Please consider:

- Your reasons for choosing the category above,
- Your feedback on any impacts that options may have on your operation
- How often those impact might occur
- Any suggested mitigations

Please provide evidence.

If you wish to supply more documentary evidence than would fit on these pages, enclose it with this form

Design Principle 8 states *“As feedback was received regarding the size of the airspace (some requesting a small volume and others a larger volume), both the height and breadth of the LETC will be fully considered.”*

Do you have any comments or ideas regarding this?

Design Principle 9 states *“The airspace design shall consider operation by a single authority”*

Do you have any comments or ideas regarding this?

Do you have any comments on the consultation itself?

Appendix C

Land's End Airport Ltd

Final Design Principles

DP1	The airspace design and its operation must be as safe or safer than today for all airspace users that are affected by the airspace change.
DP2	Subject to the overriding design principle of maintaining a high standard of safety, the highest priority principle of this airspace change is that it accords with the CAA's published Airspace Modernisation Strategy (CAP 1711) and any current or future plans associated with it.
DP3	Ensure that all airspace users, current & future, retain the ability to have safe and efficient access to the airspace.
DP4	Ensure that all possible technical solutions – both existing and emerging – are considered (e.g. RADAR, ADSB, MLAT, TCAS). The lifecycle cost of options shall be affordable to the Airport's and commercial operator's income, the equipment costs for GA and other users.
DP5	Controlled airspace options should ensure there is safe and efficient access for other types of operations, and should explore measures, including classification and flexible use of airspace, where possible and appropriate, to improve access and decrease airspace segregation.
DP6	Options should consider an RMZ and/or TMZ solution.
DP7	Ensure that any changes fully consider any environmental impact – to include noise, air pollution and social issues.
DP8	As feedback was received regarding the size of the airspace (some requesting a small volume and others a larger volume), both the height and breadth of the LETC will be fully considered.
DP9	The airspace design shall consider operation by a single authority.