

**PROPOSAL TO ESTABLISH
TEMPORARY CONTROLLED AIRSPACE
IN THE VICINITY OF
MANSTON AIRPORT**

**SPONSOR CONSULTATION
REPORT**

MANSTON CAS (T) - SPONSOR CONSULTATION REPORT

1. Overview

1.1 Having developed the proposed CAS (T) requirement and configuration, this consultation followed a process agreed by the CAA (CAP 724, Appendix F, Ref 2) which gives consideration to the nature of this proposed temporary airspace change. In accordance with the guidance provided in CAP 725 (Ref 3), Manston Airport consulted with Aviation Stakeholders, including members of the National Air Traffic Management Advisory Committees (NATMAC).

1.2 Manston did not consider that there would be any environmental impacts involving the CAS (T) and Remote Hold proposals. The proposed CAS (T) CTR around the Manston area would not require aircraft to operate in areas in which they do not normally operate. The Remote Hold is located wholly in Class G Airspace, over the sea, in an area not regularly utilized by any specific airspace users. Also, the CAS (T) and the remote hold in Class G airspace will only be in force for the period of the 2012 London Olympics and due to its temporary status and exceptional circumstances, the CAA agreed that consultation with environmental consultees was not required.

2. Sponsor Consultation

2.1 A list of sponsor consultees was drawn up with the assistance of CAA DAP, comprising;

- 15 Airport Based Operators.
- 9 Aerodrome Operators.
- 28 Aviation “National” Organizations (from NATMAC list).
- 2 Military Users.
- 1 Local environment organizations.
- 9 Information only.

2.2 The Sponsor Consultation Document was posted at a discrete link on the Manston Airport website. Consultees were invited to participate and given details of access to the Sponsor Consultation Document by e-mail.

2.3 The CAA agreed that, due to the temporary nature of the Airspace change, an 8 week period was appropriate for this consultation. Consultation began on Thursday 12th May 2011 and close on the Wednesday 6th July 2011.

2.4 Within the consultation period consultees were asked to consider the proposal and submit a response to Manston, either through a discrete e-mail address or by post. Additionally consultees had the opportunity to seek clarification of the terminology used or any aspects of the consultation or the proposed airspace change.

2.5 In order to promote a maximum response, Manston remained proactive throughout the consultation and, for those who had not responded, a reminder e-mail was sent. Subsequently this was followed up, where necessary, with individual telephone calls to organizations or representatives in the last week to elicit a response.

2.6 Access to the Sponsor Consultation Document was not limited in any way. Members of the public (including individual aviators) together with the listed consultees had access to the document through the Manston website. Submissions received from organizations or individuals who were not listed consultees have been included in this analysis.

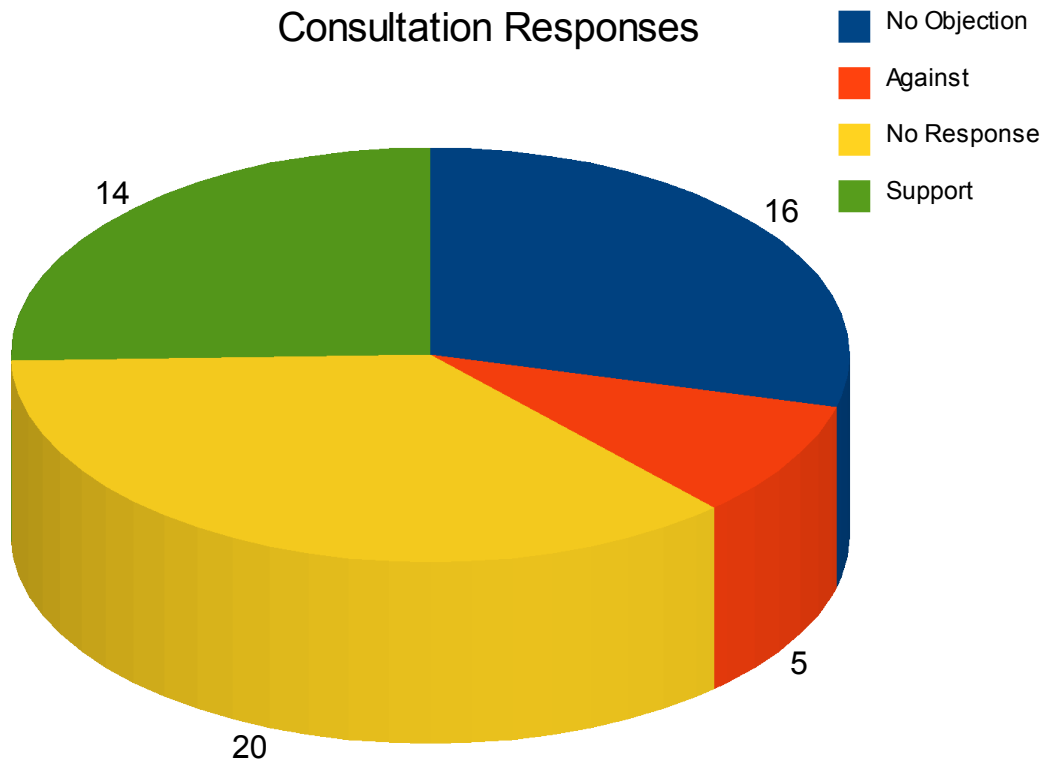
3. Response Analysis

3.1 Despite the proactive approach taken by Manston, the response rate for the consultation was average. Of the 55 organizations consulted, 35 (64%) responded to the consultation, variously by e-mail, letter or telephone call. 20 consultees (36%) did not respond.

3.2 Of the 35 consultees who responded

- 14 (40%) supported the proposal;
- 16 (46%) stated that they did not object to the proposal;
- 5 (14%) stated that they did object to the proposal;

3.3



4. Issues Raised by Sponsors

4.1 A number of issues were raised by more than one consultee, and were responded to individually. A summary of these issues, along with the responses provided, are listed in the following paragraphs.

4.4.1

Issue 1

Maypole Airfield, which operates a few non-radio aircraft, would be provided with a VFR Corridor, embedded in the CTR, to allow them to

continue to operate non radio. Aircraft from Maypole would route to/from the airfield via Canterbury VRP, to the Southwest of Manston. Aircraft were to route via the A291 to Sturry and the A28 from Sturry to Canterbury, at a height not above 1000ft QNH, until clear of the CTR. This would not be possible because of Rule 5 and the 560 ft mast NW of the Canterbury VRP. The corridor needs to be parallel to the A291, east of the A291 to intercept our circuit and then directly south.

Response 1

With regards to the routing of a VFR corridor for Maypole Airfield, I am quite happy to take the route you have suggested, parallel to the A291, east of the A291, over Blean Woods, crossing the A28 and then directly south to the CAS (T) boundary, and the reverse for the return to Maypole. With regards to altitude, we will vector aircraft at 2500ft, so the corridor will be available with a Max altitude of 1500ft QNH. This will provide you with the vertical separation you require, plus a bit more. Higher levels for your aircraft, above 1500ft could be negotiated with the Manston Radar Controller on 132.450 MHz.

4.4.2

Issue 2

On a more general point, from my perspective the entire Olympics Airspace Restriction plan seems ill thought out and designed by people who have little appreciation of General Aviation. I believe the safety implications of squeezing large numbers of aircraft into tiny corridors around the restricted area should be reconsidered. Too many organisations' ability to undertake their legitimate business will be severely and adversely affected whilst the potential benefits of the plan, including the safety considerations, appear to have been grossly overestimated.

Response 2

Whilst I understand your concerns regarding a lack of appreciation of the needs of General Aviation, it is important that Manston Airport protects its Approaches during what is likely to be an unusually busy period for the

Airport. The increased number of aircraft likely to be visiting this airspace, both General Aviation and Commercial Aviation, is likely to be of levels not experienced before. The number of pilots operating locally to us, who are not familiar with the airspace, is also likely to be at higher levels than usual. It is therefore vital that the best service provision is achieved during the busiest time. Manston Radar will be available during the daylight opening hours of the CAS (T), providing a crossing service on request, should any of your aircraft wish to transit the Manston CAS (T), rather than using the VFR Corridor to the South.

4.4.3

Issue 3

As has been discussed at a recent meeting at CAA House, one of the main aims within the NATS CAS (T) proposals, especially for Emergency Service aircraft, is to allow minimum disruption to normal operations. As Police operations are, of their nature, unplanned, it will be just as important for aircraft of this consortium to continue to operate freely over the areas of the above counties, with the addition of Kent. In practice, it will most likely only be the Essex aircraft that is likely to venture into the Manston airspace. It is also expected that, in order not to overload ATSU's, a basic service will be adequate, given an added advantage that all our aircraft are fitted with TCAS, mode C & mode S.

Response 3

I can confirm that Manston Radar will continue to provide an Air Traffic Service to all emergency aircraft on request. Manston will be providing a Radar Service during the daylight hours, and a procedural service during the quiet hours. This will provide all emergency aircraft with full access into the Manston CAS (T) airspace for the duration of its existence. We have never had any problems with the requests made of us by emergency aircraft in the past, and I would not expect anything different when our requested CAS (T) is in place. In fact, as our new radar comes on line at the end of this year, I would expect our radar coverage to improve considerably, particularly at lower levels. Therefore, we are more likely to see your aircraft, and be able to provide

assistance when requested, if not actually able to provide a full radar service due to your usual operating profiles below the Manston MSA (2300ft).

4.4.4

Issue 4

Will Manston be increasing the number of controllers to cater for the stated increased traffic, or will it merely rely on the CAS to enable it to keep its costs the same whilst getting greater income at the expense (financial and safety) of the traffic unable to gain a crossing service?

Response 4

There is no need for Manston to employ more ATCOs; we have enough to meet the requirements of our CAS (T) proposal. Manston LARS will continue to operate for current published hours, and beyond. When radar is not available, during the hours of darkness, Manston Approach will be available.

4.4.5

Issue 5

The proposed activation dates are excessive. They are not supported by the figures from the Atkins Report. We believe that the CAS should only be in place for when it is actually needed.

Response 5

The CAS (T) period of activity proposed by Manston will be dictated by NATS CAS (T) proposal. This will not only ensure that Manston Traffic is afforded the best Flight Safety we can offer, but also reduce any confusion. It was agreed with the CAA at the time of the proposal that to open and close the CAS (T) during the Olympics period was just not practical. We do still not know the levels of Traffic expected at Manston, but we are expecting our traffic levels to be much greater than usual. The proposed CAS (T) will ensure unusually high

levels of large (B747) and fast (C550) aircraft are able to operate safely, away from the areas where GA can enjoy the freedom of the sky, in Class G airspace.

4.4.6

Issue 6

In the consultation it states, "Hang-glider and Para-Glider operations would not be permitted within the CTR." Why?

Response 6

For Controlled Airspace to work, it must become a known environment. This requires all aircraft to be in communication with all aircraft within the airspace. Additionally, there will be not only an increased volume of traffic, but also a considerable diversity of air traffic utilizing the airspace. Such variations of aircraft size and performance does not lend itself to a particularly safe environment, when ATCOs will be vectoring and sequencing B747s, HS125s, DH8s etc, potentially at the same time. This not only requires the airspace to be known, to ensure separation can be maintained between known aircraft, but consideration has to be taken for the Wake Turbulence created by such aircraft.

4.4.7

Issue 7

In the consultation it states, "..., due to the ability of such aircraft [hang gliders and Para gliders] to operate from remote sites ..." What does this mean? All aircraft can operate from remote sites.

Response 7

Not all aircraft are able to operate from Remote sites. Most require at least a licensed strip or more. Hang gliders and Para-gliders are able to operate generally without restriction, due to their operating capability. The creation of

a known environment is the key to Controlled Airspace, and how it is controlled, providing a safe environment within which an Air Traffic Service is provided. Remotely operating Hang gliders and Para-gliders, potentially appearing in Controlled Airspace, not in communication with the Controllers, removes the “Known” aspect of the airspace, reducing the operational safety of the airspace for aircraft at critical stages of flight during take-off and landing.

5. Post Consultation Negotiation

5.1 Manston ATC has agreed that, should this ACP for CAS (T) be approved, they will enter into further negotiations with certain sponsor consultees. Such agreements will be established in accordance with the guidelines laid down in MATS Pt 1 (CAP493), Section 3, Chapter 4 – Integration of VFR Flights with IFR Traffic in Class D Airspace, subject to necessary Approval by CAA SRG.

6. Conclusions from the Sponsor Consultation

6.1 As a consequence of the response rate and the quality of responses received, both for and against this CAS (T) proposal, Manston has concluded that the Sponsor Consultation process was both satisfactory and adequate.

6.2 A total of 35 consultees responded to the Sponsor consultation for the establishment of CAS (T) around Manston Airport, for the duration of the London 2012 Olympic Games. From the responses received, 86% were either in favour of the CAS (T) proposal or had no objection. Only 14% of the Sponsor Consultees were against this Airspace Change proposal.

6.3 The objections of all of the five objectors were completely understandable, since the airspace change proposed will have the greatest effect on their operations. As stated in paragraph 7.5, Manston has agreed to enter into further negotiations with some of these objectors, should this ACP be approved. It has been emphasized throughout that this CAS (T) was in the interest of flight safety for all airspace users, and was only temporary in nature, during exceptional circumstances.

6.4 The airspace was developed with the consideration of all airspace users in mind, in negotiation with NATS. One revision has been made, concerning access to/from Maypole Airfield, and further discussions have been agreed with Manston Airport based flying club, to ensure business as normal, as far as possible.