

CAA Consultation Assessment

Title of airspace change proposal	Manchester Low Level Route
Change sponsor	UK Civil Aviation Authority
Project reference	RCL-2024-001
Account Manager	[REDACTED]
Case study commencement date	17 September 2024
Case study report as at	3 October 2024
<i>Instructions</i> In providing a response for each question, please ensure that the 'status' column is completed using the following options: • YES • NO • PARTIALLY • N/A To aid the SARG Lead it may be useful that each question is also highlighted accordingly to illustrate what is: resolved YES not resolved PARTIALLY not compliant NO	

Executive Summary

The sponsor for this change proposal is the UK Civil Aviation Authority (CAA) in accordance with the CAP 1991 process for the CAA to review classification of airspace. The proposal made by the CAA's Airspace Classification (AC) team as the sponsor is to amend the corridor of airspace currently known as the Manchester Low Level Route (MLLR). The MLLR is 4 nautical miles (nm) wide at its narrowest point, aligned on a North to South axis between Manchester and Liverpool airports with a maximum altitude of 1300 ft Above Mean Sea Level (AMSL). It provides a route through the Manchester Control Zone (CTR) for aircraft wishing to transit between the two airports. The Low-Level Route (LLR) sits within Class D airspace. Unlike the rest of UK Class D airspace, no verbal clearance from Air Traffic Control (ATC) is required to operate within the LLR providing that a set of conditions prescribed in the UK Aeronautical Information Publication (AIP) are adhered to.

The CAA announced its intention to review the classification of this airspace in May 2022 and published the result of its review in July 2023. Whilst the airspace was not deemed unsafe, some risks and potential improvements to lower risk were identified.

At the time of the review Official Record Series 4 (ORS4) No.1545 permitted the operation of the MLLR in accordance with the stipulated conditions until its expiry on 31 May 2024, after which time the airspace would have reverted to a standard class D operation requiring verbal clearance. ORS4 was

superseded by the issue of ORS4 No.1596 which extends the expiry date of the current procedures until 31 May 2025. The sponsor has confirmed that on expiry of the procedures, the MLLR will undergo a change regardless of the outcome of this airspace change proposal.

The sponsor used preliminary engagement activities with key stakeholders to shape the proposals that they then formally engaged on over an 11-week period from 21 May 2024 to 5 August 2024. Views were sought online on proposals to raise the upper limit of the LLR by 200 ft to 1,500 ft AMSL, widen the area south of the M56 motorway to the east by 0.65nm and re-classify the area as Class G airspace. The final element of the proposal comprised applying a Restricted Area (RA) to the entire volume of airspace permitting access to any aircraft operating in accordance with 4 specified criteria, i.e., a speed restriction of 140 knots, a 5km minimum visibility rule, operating on a QNH altimeter setting and a maximum weight of 40,000 kg.

A total of 322 responses were submitted with 89% of these being submitted by members of the General Aviation (GA) community. Feedback received during preliminary engagement activities with stakeholders helped to shape the proposals that were formally engaged upon. No amendments were made to the proposals on account of feedback submitted during the formal engagement window.

PART A – Summary of Airspace Change Process to date		
A.1		
A.2	Stage 1 DEFINE Gateway	N/A
A.2.1		
A.3	Stage 2 DEVELOP & ASSESS Gateway	N/A
A.3.1		
A.4	Stage 3 CONSULT Gateway	N/A
A.4.1		
A.5	Stage 4 UPDATE & SUBMIT	
A.5.1	The Airspace Classification team formally submitted their proposal which included all the required documentation.	

PART B – Consultation Assessment		
B.1	AUDIENCE	
B.1.1	Did the consultation target the right audience?	Yes
	CAP 1919 (para 182) envisages that affected stakeholders may include airspace users, airports using the neighbouring airspace or air navigation service providers that might experience consequential impacts. Where a change may impact the GA community, communication will take place with local GA users and national bodies representing GA activity. If impacts on specific communities are identified, consideration will be given to who needs to be contacted. The sponsor's approach to stakeholder identification is aligned with CAP 1991. The Airspace Classification (AC) team conducted a stakeholder mapping exercise at the outset and adopted a tiered approach based on those most impacted by proposed amendments. The types of stakeholders mapped into the tiers are explained below: <u>Tier 1 stakeholders</u> were the airports responsible for controlled airspace (CAS) in the area and their Air Navigation Service Providers (ANSPs): • Manchester Airport • Liverpool Airport • NATS The AC Team has advised that Liverpool Airport perform their Air Traffic Service (ATS) in-house and are referred to as ATCSL or Liverpool interchangeably and that by engaging with Liverpool Airport, the sponsor has also engaged with their ANSP. <u>Tier 2 stakeholders</u> comprised regular users of the LLR and surrounding airspace or highly informed on how it is used namely: • Local aerodromes, for e.g., Manchester Barton Airport and Blackpool Airport. • Commercial operators and other users of the MLLR and airspace around Manchester and Liverpool including PDG Aviation, GB Helicopters, Sloane Helicopters and the Ministry of Defence (MoD) via Defence Airspace and Air Traffic Management (DAATM). • Emergency Services including National Police Air Service (NPAS) and Northwest Air Ambulance/Babcock International. <u>Tier 3 stakeholders</u> included the General Aviation (GA) community which are stated by the sponsor to be the majority of MLLR users: • Elected representatives for wards situated under the MLLR (namely c.100 councillors representing Wigan Council, St. Helens Borough Council, Cheshire West and Chester Council and also Cheshire East Council). • Individual members of the General Aviation (GA) community. • Members of the communities under and adjacent to the MLLR.	

	Any other interested parties. The AC team contacted the CAA's Skywise audience (12,931 stakeholders who have signed up to receive CAA alerts about airspace matters), those on the CAA's Airspace mailing list (1,261 stakeholders who have signed up to receive more detailed messages about airspace matters) and 109 stakeholders who had responded to the AC's call for evidence for a previous AC review and who had commented on the MLLR review. Although individual members of the GA community are not listed on the sponsor's stakeholder list, the AC team have clarified that GA stakeholders have been targeted via multiple channels including GA-specific trade media outlets such as "Flyer" and use of the CAA's Skywise alert system and Airspace mailing list as discussed above. The sponsor has advised that the Skywise and Airspace mailing lists include key representatives from GA stakeholder national organisations such as the Aircraft Owners and Pilots Association (AOPA), the General Aviation Alliance (GAA), the British Hang Gliding and Paragliding Association (BHPA) and the Light Aircraft Association (LAA). The sponsor used these organisations as intermediaries to disseminate information on the MLLR proposal to their members. The NATMAC list of stakeholders includes the national GA organisations mentioned above and the sponsor has advised that briefings on the proposed changes to the MLLR were provided to the NATMAC membership in October 2023 and April 2024.														
B.1.2	Please provide a summary of responses below														
	The AC team received 322 responses to their online engagement survey with 300 (93%) from individuals and 22 (6.83%) from organisations. The quantitative data obtained from engagement responses is set out below. After being asked for their name and whether they were responding on behalf of an organisation, stakeholders were asked to select the best description for them as a respondent: <table border="1"> <thead> <tr> <th colspan="2">Question 3 Are you answering as...</th></tr> </thead> <tbody> <tr> <td>Resident affected by aviation</td><td>8 (2.48%)</td></tr> <tr> <td>Airline passenger</td><td>2 (0.62%)</td></tr> <tr> <td>Member of GA community</td><td>288 (89.44%)</td></tr> <tr> <td>Unmanned Aerial System</td><td>1 (0.31%)</td></tr> <tr> <td>Member of the commercial aviation industry</td><td>15 (4.66%)</td></tr> <tr> <td>Central or local government body including military</td><td>4 (1.24%)</td></tr> </tbody> </table>	Question 3 Are you answering as...		Resident affected by aviation	8 (2.48%)	Airline passenger	2 (0.62%)	Member of GA community	288 (89.44%)	Unmanned Aerial System	1 (0.31%)	Member of the commercial aviation industry	15 (4.66%)	Central or local government body including military	4 (1.24%)
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Elected political representative (for e.g., councillor or MP).	0
National representative organisation (for e.g., trade association).	3 (0.93%)
Local organisation (for e.g., community action group).	1 (0.31%)
Not answered	0
Totals	322

GA community members were asked to provide further detail.

If you are a member of the General Aviation community, which sub-category are you answering as?	
Balloon	0
Fixed-wing 0 – 2 tonne MTOW	213 (66,15%)
Fixed-wing 2+ tonne MTOW	14 (4.35%)
Glider	0
Hang Gliding and Paragliding	0
Helicopter	15 (4.66%)
Microlight	49 (15.22%)
Model Aircraft	0
Other	3 (0.93%)
Not answered	28 (8.70%)
Total	322

Members of the commercial aviation industry were asked to provide further detail.

If you are from the commercial aviation industry, which sub-category are you answering as?	
Airline	9 (2.80%)
Airport	2 (0.62%)
Air Navigation Service Provider	2 (0.62%)
Business Aviation	6 (1.86%)
Other	18 (5.59%)
Not answered	285 (88.51%)
Total	322

Those falling within the “other” category above included a helicopter instructor and the police.

Question 6 asked respondents about the proposal to reclassify the LLR to Class G airspace. A free-text box provided stakeholders with an opportunity to provide their reasoning. The qualitative data obtained from this question is discussed later in this assessment at question B.5.4 below.

Question 6 What are your views on the proposal to reclassify the MLLR to Class G uncontrolled airspace?	
Strongly support	202 (62.73%)
Support	72 (22.36%)
No strong feelings either way	31 (9.63%)
Oppose	12 (3.73%)
Strongly oppose	5 (1.55%)
Not answered	0
Total	322

Question 7 asked for views on raising the altitude of the MLLR. A free-text box provided stakeholders with an opportunity to provide their reasoning. The qualitative data obtained from this question is discussed at question B.5.4 below.

Question 7 What are your views on the proposal to raise the altitude of the MLLR from 1300 ft to 1500 ft?	
Strongly support	269 (83.54%)
Support	45(13.98%)
No strong feelings either way	5 (1.55%)
Oppose	1 (0.31%)
Strongly oppose	2 (0.62%)
Not answered	0
Total	322

Question 8 sought views on the proposal regarding the proposal to implement a Restricted Area (RA) with stakeholders asked to indicate their level of support to the use of speed restriction, 5km visibility, the QNH altimeter setting and weight restriction of 40,000 kg or less. The responses are captured in the following four tables. There was also a free-text box to capture reasoning for responses provided. The qualitative data obtained from this question is discussed at question B.5.4 below.

Question 8 What are your views on the proposal to implement a Restricted Area covering the MLLR?	
Speed restriction.	
Strongly support	140 (43.48%)
Support	77 (23.91%)
No strong feelings either way	75 (23.29%)
Oppose	16 (4.97%)
Strongly oppose	13 (4.04%)

	Not answered	1 (0.31%)
	Total	322
Question 8 What are your views on the proposal to implement a Restricted Area covering the MLLR? 5km visibility		
	Strongly support	127 (39.44%)
	Support	94 (29.19%)
	No strong feelings either way	62 (19.25%)
	Oppose	26 (8.07%)
	Strongly oppose	9 (2.80%)
	Not answered	4 (1.24%)
	Total	322
Question 8 What are your views on the proposal to implement a Restricted Area covering the MLLR? QNH setting		
	Strongly support	164 (50.93%)
	Support	92 (28.57%)
	No strong feelings either way	51 (15.84%)
	Oppose	4 (1.24%)
	Strongly oppose	4 (1.24%)
	Not answered	7 (2.17%)

	Total	322
	Question 8 What are your views on the proposal to implement a Restricted Area covering the MLLR? Weight restriction of 40,000 kg or less	
	Strongly support	159 (49.38%)
	Support	57 (17.70%)
	No strong feelings either way	78 (24.22%)
	Oppose	12 (3.73%)
	Strongly oppose	11 (3.42%)
	Not answered	5 (1.55%)
	Total	322
	Question 9 asked about increasing the width of the MLLR. A free-text box provided stakeholders with an opportunity to provide their reasoning. The qualitative data obtained from this question is discussed at question B.5.4 below.	
	Question 9 What are your views on the proposal to increase the width of the MLLR to the east?	
	Strongly support	233 (72.36%)
	Support	63 (19.57%)
	No strong feelings either way	19 (5.90%)
	Oppose	2 (0.62%)
	Strongly oppose	4 (1.24%)
	Not answered	1 (0.31%)
	Total	322

Question 10 sought views on safety concerns.

Question 10 Do you have any concerns about the safety of the airspace if the proposed amendment is implemented?	
Yes	60 (18.63%)
No	259 (80.43%)
Not answered	3 (0.93%)
Total	322

Question 11 asked respondents about environmental impacts. There was also a free-text box to capture reasoning for responses provided. The qualitative data obtained from this question is discussed at question B.5.4 below.

Question 11 Do you have any concerns about the impact on local communities or the environment if the proposed amendment is implemented?	
Yes	14 (4.35%)
No	306 (95.03%)
Not answered	2 (0.62%)
Total	322

Question 12 asked stakeholders whether they would fly in the area more if the proposals were to be implemented. There was a typographical error in the question with the word “it” omitted.

Question 12 If implemented, how likely is (it) that this proposed amendment would increase how often you fly in this area?	
Extremely likely	37 (11.49%)
Likely	97 (30.12%)

	About the same	155 (48.14%)	
	Unlikely	9 (2.80%)	
	Extremely unlikely	6 (1.86%)	
	N/A	17 (5.28%)	
	Not answered	1 (0.31%)	
	Total	322	
	Question 13 asked respondents whether there were any additional considerations or issues they wanted the CAA to take into account. The qualitative data obtained from the 140 responses to this question is discussed later in this assessment. The sponsor identified common themes running through the feedback and has provided their response to these within their submission.		
B.2	APPROACH		
B.2.1	Did the change sponsor consult stakeholders in a suitable way?	Yes	
	CAP 1991, para 185 refers to the terms engagement and targeted consultation. The sponsor has predominantly referred to their activity as engagement both during the activity and throughout the submission but on occasion both the terms “consultation” and “engagement” have been used. For example, an item posted on LinkedIn on 08.07.24 refers to an extension of the public engagement period while including a graphic entitled “Manchester Low Level Route Consultation”. In response to a request for clarification (MLLR Clarification Questions Template), the AC team have stated that using the term “engagement” was considered a more suitable approach with concerted efforts made to engage with stakeholder groups over an extended period of time to ensure the development of an optimal solution. The sponsor achieved a good level of response and has demonstrated a proactive approach to the activity conducted. The activity was conducted in line with the government’s consultation principles and gunning principles (as discussed in C1 below). The engagement activity was conducted using the CAA’s consultation website through which stakeholders were invited to complete an online survey form. This was supplemented by activities held in-person such as public information drop-in sessions. CAP 1991 (para 185) references the use of the CAA’s consultation website and/or the dedicated pages on airspace classification when consulting. Although the latter does not appear to have been utilised, the engagement was conducted via the CAA’s consultation website and so stakeholders were engaged in a suitable way.		
B.2.2	What steps did the change sponsor take to encourage stakeholders to engage in the consultation?		
	The sponsor used a mix of communication methods and channels to encourage stakeholders to engage both prior to and during the		

formal engagement period. Activities were tailored to suit the nature of the stakeholder audiences being targeted.

Preliminary engagement

Prior to commencement of the formal engagement period in May 2024, preliminary engagement was conducted with tier 1 and 2 stakeholders. For tier 1 stakeholders, this activity included an initial meeting held in October 2023 followed by a HAZID session in January 2024. In October 2023, tier 2 stakeholders were signposted to a report on the MLLR (that had been published in July 2023), highlighting issues identified and proposals for change under consideration. Subsequently, these stakeholders were invited to attend an in-person briefing (held February 2024 in Manchester) and encouraged to provide their feedback on initial proposals presented.

In addition, the AC team presented their proposals at four Local Airspace Infringement Team (LAIT) meetings held between July 2023 and April 2024. These are meetings that are open to the flying community to attend.

Formal engagement period

The steps taken to encourage participation in the formal engagement period are as follows.

- On the first day of the engagement period, namely 21 May 2024, emails were sent to targeted stakeholders.
- Publicising of the engagement period and the drop-in session details was via a Skywise alert issued on 21 May 2024, a local media briefing issued to newspapers circulating in the Manchester/Liverpool area and a briefing issued to GA trade media via email.
- A dedicated email address was provided for any questions to be submitted to the AC team.
- A public drop-in session was held on 4 June 2024 in Northwich. Information boards were displayed, and members of the project team were available to answer questions and encourage completion of the online survey form. The event was attended by 25 stakeholders.
- An email was circulated to stakeholders on 8 July 2024 (4 weeks prior to engagement closing) informing that the engagement period was being extended.
- Publicity materials were refreshed and issued on 8 July 2024 to publicise the extension. This was supported by social media posts on X and LinkedIn and social media paid adverts which specifically targeted communities under the Restricted Area (RA).
- Updates were posted on the sponsor's social media platforms on 5 August 2024 informing stakeholders that the engagement period was closing that day.
- Although the engagement activity was hosted on the CAA's consultation website, provision was made for postal responses to be submitted if stakeholders were unable to respond electronically. The address for postal returns was included in the engagement document and on the presentation used at the public drop-in session. No postal responses were received.

There was a minor typographical error in the trade media briefing for editors issued on 21 May 2024 which referred to a 6-week engagement period when it was originally 8-weeks. However, the briefing did contain a link to the online response platform which

	showed the dates of the engagement window and there is no evidence of this causing an issue with any stakeholders. The sponsor has provided evidence in support of the engagement activities conducted and the evidence has been reviewed (Appendix L Engagement Materials).	
B.2.3	Was the change sponsor required to respond to any unexpected events and/or challenges?	Yes
	Yes, two challenges were experienced at the beginning of the public engagement exercise: • An incident on Singapore Airways flight 321 on 21 May 2024 resulted in the temporary suspension of all CAA social media activities. • On 22 May 2024 the Prime Minister called for a UK Parliamentary General Election to be held on 4 July 2024. This meant that the CAA, being an arm's length body, was bound by the restrictions on communications that apply to the UK Civil Service in the pre-election period. Following the issue of media briefings, a SkyWise alert and launch email to targeted stakeholders on 21 May 2024, other forms of communication and publicity ceased until after the General Election. The engagement duration was extended by three weeks. This provided a four-week period after the Election for the AC team to raise awareness of the exercise and generate an appropriate level of response. After the General Election communications and publicity channels were used to inform stakeholders of the extension. An email was issued to targeted stakeholders and a local media briefing, SkyWise alert and social media posts/adverts were utilised.	
B.3	MATERIALS	
B.3.1	What materials were used by the change sponsor during the consultation?	
	The following materials were used: • Public Engagement Document CAP 2992. Version 1 was published May 2024. Version 2 was published June 2024 to address typographical errors. This was a 47-page document that set out the history of the MLLR and how it works today as well as its current users. An explanation was provided on the reasons for proposing change and solutions already considered and discounted. The design objectives used to create the design were discussed and the four elements of the proposal presented. Text was supported by visual depictions of the proposals. The anticipated effects were explained including an assessment of no negative impacts on safety in the surrounding controlled airspace. Stakeholders were informed how they could provide feedback and provided with a glossary of terms. • Public Engagement Summary CAP 2992A. Version 1 was published 21 May 2024. Version 2 was published 22 May 2024 which included the engagement window closing date and a link to the online platform for responses. The summary was an 8-page document providing the salient points of the proposal and anticipated effects. • Overview page and survey form hosted via the CAA's consultation website. • Presentation for public information drop-in session held on 4 June 2024 for Tier 3 stakeholder audience.	

B.3.2	Did the materials provide stakeholders with enough information to ensure that they understood the issue(s) and potential impact(s) on them?	Yes
	Yes, the materials were comprehensive with explanations of technical aviation terms in language that could be understood by a non-aviation audience. For e.g., detail was provided via footnotes for terms including control zone, Visual Flights Rules (VFR) flights and FLARM etc. Visual depictions of the proposals were included to aide understanding of what was being presented. The summary document was written in a very easy to read format outlining the four elements of the proposal and anticipated effects as well as signposting respondents to the online response platform. Feedback was received that the definition of the RA within the engagement materials was confusing. The sponsor responded expressing confidence that their materials were written clearly as evidenced by the number of stakeholders who engaged in the process.	
B.4	LENGTH	
B.4.1	Please confirm the start/end dates and the duration of the consultation below	
	Start date: 21 May 2024 Original end date: 16 July 2024 Duration: 8 weeks On 22 May 2024, a UK Parliamentary General Election was called with polling to take place on 4 July 2024. Planned communications for the public engagement exercise were put on hold during the pre-election period. The decision was taken to extend the duration of the exercise to maximise participation. Revised end date: 5 August 2024 Overall duration: 11 weeks.	
B.4.2	Was the period of consultation proportionate?	Yes
	The proposal to amend the MLLR was conducted by reference to CAP 1991 requirements which state that two months will normally be allowed for responses when feedback is sought (CAP 1991, para 123). The overall duration of 11 weeks exceeded CAP 1991 expectations. A proactive approach was adopted to engagement and a good level of response was achieved. Considering the nature of the change proposed, the period of engagement was reasonable and proportionate.	
B.5	GENERAL	

B.5.1	Was the conduct of the consultation aligned with the consultation strategy?	Yes
	Yes, the conduct of the engagement was for the most part aligned with the strategy. There was a deviation on the approach regarding planned tier 3 engagement with elected representatives. Although not exactly specified in the strategy the AC team has explained that they originally planned to contact MPs representing those constituencies under the MLLR/Restricted Area (RA). However, due to the dissolution of parliament, all MPs lost their seats. The AC team state that after the General Election, as a public body, they were not in a position to immediately contact all newly elected MPs. However, views were sought from local authority elected representatives covering the area. There was also a minor deviation regarding the approach being taken on engagement with GA representatives which were included in the tier 2 group of stakeholders in the strategy but placed in tier 3 when the engagement activity was carried out. The AC team have clarified (MLLR Clarification Questions Template) that their approach evolved such that they determined it would be more effective to obtain input from GA representatives via engagement with smaller local airports and some of their key users. The revision in approach is reasonable and is an example of the proactive manner in which this sponsor has conducted their engagement.	
B.5.2	Has the change sponsor categorised the responses in accordance with CAP 1991?	Yes
	CAP 1991, para 188 requires categorisation and close consideration of those responses that have the potential to impact the proposal. Responses were analysed and categorised. Given the overall level of support to the changes proposed the AC team have focussed on addressing more critical feedback and suggestions to further refine the proposal (MLLR Engagement Response Document (Appendix A)).	
B.5.3	Has the change sponsor correctly identified all of the issues raised during the consultation and accurately captured them in the consultation response document?	Yes
	Yes, the AC team is progressing with a final proposal that was shaped to take account of feedback in earlier engagement activities. The response data outlined within this assessment demonstrates a high level of support for the proposal. The sponsor did not revise their design following the formal engagement activity conducted in May to August 2024.	
B.5.4	Does the consultation response document detail the change sponsor's response to the identified issues? Is the change sponsor's response to the issues raised appropriate/adequate?	Yes
	Feedback received has been themed within the engagement response document. The main themes and the sponsor's response to each are outlined below. <u>Further increasing height or width of LLR</u> Many respondents expressed the view that increasing the height and width would increase safety, but it was also suggested that the height be raised further than proposed for e.g., to 2000 ft to offer a vertical escape route downward in the event of conflicting traffic	

	coming the other way. Manchester Airport stated that concerns existed about the reduced vertical separation from aircraft arriving on to RWY 05R and RWY 05L. A wider corridor was sought by some respondents to allow for greater separation of aircraft using the corridor and to reduce choking and risk of mid-air collision (MAC). There was a suggestion that the airspace be widened further to the east to ease transit into Barton. Manchester Airport sought for no further extension east than articulated within the engagement materials as they were concerned that any further widening might impact future airspace designs yet to be finalised and still subject to public consultation. Sponsor's response: Further expansion would interfere significantly with either current operations at Manchester and/or Liverpool airports or interfere with their ongoing airspace change proposals. Going beyond the proposed dimensions and requiring changes to existing procedures would require application of a regulatory process outside the CAP 1991 framework. The height and width proposed are the maximum feasible without negatively impacting surrounding operations. Manchester Airport Group (MAG) and Liverpool airport are expected to minimise CAS requirements as part of their Future Airspace Strategy Implementation (FASI) proposals. <u>Alternative classification</u> Various views were expressed on classification including that Class D airspace be maintained with a listening squawk or that the airspace be re-classified as Class E airspace. Alternatively, it was considered that class G would encourage pilots that currently avoid the LLR due to its class D classification, provide flexibility, reduce workload for pilots and improve safety. Many were of the view that the current arrangement provides no more than the equivalent of a class G environment anyway. Manchester Airport stated that reclassification would be the best option available once the ORS4 expires. They stated that retaining the LLR as Class D airspace without this exemption would lead to an increased workload on the airport's ANSP and potentially a reduction in the safety of Manchester Airport's operation. Sponsor's response: The MLLR will cease to exist due to the expiration of the current exemption in ORS4 No.1596. Continued class D would result in a degradation of safety barriers and likely all but remove service provision due to high ATC workload. Safety related issues and risks identified in our review have to be addressed via this amendment. The amount of CAS must be kept to a minimum to maintain a high standard of safety. There is no requirement for the MLLR to remain as controlled airspace under Class E or any other classification. Class E does not require ATC interaction for Visual Flights Rules (VFR) traffic and only applies separation to Instrument Flight Rules (IFR) traffic. The airspace dimensions are not appropriate to provide separation standards and the lack of control over VFR operations offers no improvement to safety, or risks lowering, over Class G. <u>Restricted Area</u> Concerns were expressed that the changes proposed to the RA, could create confusion, deter use, and add complexity. Some respondents raised concerns regarding the potential closure of the RA when other airspace users require access. It was suggested that the exemption list be extended to include military traffic. Enquiries were made regarding how the RA would be enforced. Sponsor's response: RAs are common across the UK and are designed to enhance safety without significantly impacting accessibility. Restrictions for entry to the RA will be published on VFR charts. A communication campaign will be conducted to raise awareness of the changes. The "Fail Safe" design of the changes will ensure that any pilots erroneously entering the airspace in alignment with current day procedures will by default adhere to the RA conditions and so safety will not be inadvertently compromised. In the event a temporary
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	closure of the RA is required, this would be managed in accordance with established procedures and any closures communicated in advance with alternative routing provided where necessary to minimise disruption. There has been no request from the military for an exemption to be applied to the RA's proposed ruleset and a blanket exemption for all military traffic is not considered appropriate particularly given the size and speed of some military traffic. Enforcement of the RA will be in line with established practices used in other RAs across the UK. <u>Restricted Area and speed restriction</u> Various suggestions were made for higher and lower speed limits within the RA or to eliminate the speed restriction entirely. The MoD via DAATM opposed the speed restriction proposal and stated that without dispensation for military aircraft to cross at above 140kts with a service, or for fast jet aircraft to cross flying at 250kts below 10,000 ft, they would have to remain clear of the expanded MLLR and seek crossing of congested airspace potentially closer to Manchester or Liverpool, potentially causing higher workloads for both crews and controllers. Sponsor's response: The speed limit of 140 knots (kts) has been carried over from the existing MLLR ruleset and is designed to enhance safety by giving pilots more time to employ see-and-avoid techniques and so reduce the risk of MAC. The 140 kts limit is justified in SERA.5001 Table S5-1 note 3 as giving a pilot more time to avoid a collision. It is not lower than the limit that users of the MLLR are currently used to. CAA note: In response to a clarification question put to the AC team (MLLR Clarification Questions Template) regarding whether there has been any supplementary engagement with DAATM regarding their feedback, the sponsor has advised that they did not engage further with DAATM because the 140 kts is a cornerstone of their safety case to enable the change proposed. They state further that maintaining the restriction is essential for achieving the desired safety outcomes. The solution being proposed does not alter how the military interact with this volume of airspace compared to the current scenario. Military aircraft will continue to operate as they do today and there should be no additional impact on their operations. <u>Restricted Area and 5km visibility</u> Some respondents considered the 5km visibility limit to be unnecessary or excessive compared to other class G airspace. An alternative suggestion was to make the transit zone mandatory for ADS-B and mandate that all aircraft transmitting it are equipped with ADS-B Out to be electronically conspicuous to each other. Sponsor's response: The visibility requirement is carried over from the current ruleset and designed to reduce the risk of MAC in an area of busy and complex airspace by giving pilots more time to visually identify and avoid other aircraft. The enhanced visibility supports more accurate visual navigation which helps to minimise the risk of airspace infringements near the CAS of Manchester and Liverpool Airports. It provides enhanced situational awareness for pilots and will aid them in identifying ground features which can assist in ensuring aircraft remain outside CAS structures. Introducing mandatory electronic conspicuity would represent a significant change. EC technology is not yet mature enough for consideration as a mandatory requirement in this airspace.
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Restricted Area and QNH (altimeter setting for measuring altitude above mean sea level (AMSL))

Concerns were raised regarding the mandatory QNH requirements, for e.g., that it would provide insufficient mitigation against airspace infringements. It was suggested that Manchester QNH should be mandated.

Sponsor's response: To ensure consistency of altitude readings and to reduce the risk of aircraft inadvertently reducing vertical separation against aircraft within CAS, mandating a QNH setting is essential to maintain an acceptable level of safety. Due to the proximity of Manchester and Liverpool the QNH at these airfields is usually the same or varies by 1hPa and extremely rarely by 2hPa. With such a small variance the safety assessment of using either QNH was conducted by Manchester ATC and Liverpool ATC and the suggestion adopted into this proposal. We are confident using either QNH is appropriate and safe, and it remains appropriate that individual pilots have the flexibility to choose local QNH that best suits their flight or operation.

Suggestion to use QFE (atmospheric pressure at aerodrome elevation or at runway threshold)

One GA (microlight) respondent, while welcoming the proposed increase in height, sought the use of QFE for either Manchester or Liverpool as a safer option for terrain clearance in the MLLR and as it would be far better in the event of a precautionary outlanding.

Sponsor's response: The use of QFE would increase risk by offering only a reference against a single point of elevation at either airport. QFE is of no use when navigating away from an airfield. QNH is safer for en-route navigation and is essential in maintaining consistent altitude references against airspace volumes with limits also defined as an altitude. Better separation is ensured from terrain and other aircraft.

Restricted Area and weight restriction of 40,000 kg or less.

Concerns were raised regarding the chosen weight restriction for the RA. The view was expressed that the weight restriction should be much lower as a 40-tonne aircraft was considered too big and not sufficiently manoeuvrable.

Sponsor's response: This restriction represents an improvement over today's operation of the MLLR and is important to maximise safety. It is not intended to open the RA up to larger aircraft and will officially exclude any aircraft of wake turbulence category "Medium" and above. The weight limit proposed is due to feedback from local airfields that the "Small" category allows them to continue accommodating aircraft such as Chinooks which are vital to their operations and growth.

Impact on safety

Concerns were expressed that safety would decrease and a funnelling effect would result. Reference was made to current mid-air collision (MAC) risk.

Sponsor's response: The changes proposed will result in a reduction of risk. The safety assessment confirms that the proposal meets all safety requirements and is deemed acceptably safe. The elements of the proposal are designed to enhance safety. The RA conditions will improve safety by enforcing appropriate speed limits, visibility minima, the use of consistent QNH settings and weight restrictions. These measures will reduce the risk of MAC and emergency landings.

Engine failure

Concerns were raised by a commercial operator of a negative impact on safety, regarding a straight-ahead engine failure procedure for example from RWYs 23L and 23R at Manchester. Aircraft experiencing one-engine out would be entering a hold within class G airspace at an altitude where it could easily conflict with uncontrolled GA traffic. TUI stated they had calculated that aeroplanes would be outside CAS for 4 – 5nm or more in an extremely high workload scenario and this was likely to be worse in the summer with higher temperatures and decreased aeroplane performance when more Visual Flights Rules (VFR) traffic would be active. When combined with no requirement to have an ATC listening watch, TUI expressed their objection.

Sponsor's response: Procedure designers for a long-haul airline at Manchester have informed the AC team that the procedure is designed to avoid obstacles on the ground and terrain – airspace is not considered as an air traffic service (ATS) is provided. The situation of an aircraft leaving CAS and entering Class G airspace at low level when employing this procedure is common at virtually all airports in the UK. Liverpool Airport's safety assessment concluded the risk associated with engine-out procedures in this context is deemed tolerable with appropriate mitigations in place and in alignment with comparable procedures at other airfields nationwide.

Specific routes for northerly and southerly traffic flow within the RA.

Separation between northbound and southbound traffic was suggested in the form of a dual carriageway to mitigate against the risk of MAC even further or that a "keep right" recommendation be implemented.

Sponsor's response: This option has been previously discounted but on re-consideration on account of feedback it is assessed as not feasible as the limited airspace prevents the establishment of safe buffer zones between opposite-direction tracks and the surrounding CAS. Also, this option would conflict with the principles of class G airspace which provides the flexibility to navigate freely.

Request for mandatory designated frequency or squawk

Some stakeholders stated that a designated monitoring frequency or squawk should remain mandatory or that they would want to receive assistance from ATC. One respondent stated that even with improvements the LLR would still be a dangerous area of airspace and that if mandatory squawk was removed and radar coverage reduced, then it would be a backward step.

Sponsor's response: We are no longer in a position to mandate these elements. Class G airspace is designed to provide greater flexibility and accessibility for airspace users and so mandatory frequency, or squawk codes do not align with the principles of class G airspace. Airspace users will still be able to request a service outside CAS from ATC. The use of Frequency Monitoring Codes (FMC) is actively encouraged in the area.

Transponder Mandatory Zone (TMZ)/Radio Mandatory Zone (RMZ)

Making the MLLR a TMZ and RMZ was suggested. One respondent considered that making the area an RMZ would achieve the same outcome but be more logical. Another felt that a TMZ would reduce airspace infringements.

Sponsor's response: We do not want to exclude airspace users who currently have access to the airspace. Without access, users would

	need to either request an alternative clearance through CAS from Manchester or Liverpool airports which could significantly increase ATC workload or fly a much longer route around CAS with increased risk of overflying high ground or open water. <u>Position of the LLR over schools</u> One respondent explained that the route passes over a very high pupil population with Hartford being an educational hub and sought a re-location of the LLR well away from this high-density school population. Sponsor's response: We understand the concerns regarding the presence of schools and potential safety implications. Our primary goal is to enhance safety for both aircraft and those on the ground, including in areas where schools are located. The proposed amendments are designed to reduce the risk of incidents and provide greater protection for all individuals beneath the airspace. <u>Potential impact on Ashcroft Airfield</u> An aircraft operator from Ashcroft Airfield, while supporting the raising of the height of the LLR as it would potentially increase separation from Ashcroft circuit traffic, remained concerned regarding the potential for conflicts between LLR traffic and circuit traffic at Ashcroft. <u>Sponsor's response:</u> This feedback was considered to be out of scope. <u>Environmental concerns</u> As outlined at B1.2 above, 95% of respondents had no environmental concerns. One respondent asked if the CAA had carried out due diligence checks on environmental impact. The view was expressed that the route should be higher both for safety and to alleviate noise impact and reference was made to the extension to the east possibly causing some residents not currently affected to experience increased noise disturbance. Sponsor's response: Environmental assessment has concluded that no impact on the environment or noise levels is expected. Neither traffic volume nor noise will increase. Higher flight altitudes and possible greater noise dispersal due to the extra width may reduce noise in areas that are currently overflowed. Noise increases in newly overflowed areas will be minimal with significant noise events expected to occur less than once a week. Overall impact is assessed as zero. The changes will not result in increased emissions, breaches of air quality limits or a negative impact on local biodiversity. <u>Concerns regarding engagement activity</u> Some respondents stated that the engagement should have been more closely aligned with CAP 1616 requirements and that the activity was impacted by the General Election. Sponsor's response: The engagement was conducted in accordance with CAP 1991 which allows for a proportionate approach, while referencing CAP 1616 best practise principles. The engagement period was extended due to the General Election and comprehensive efforts made to communicate this to stakeholders. Additional engagement activities were utilised to maximise participation.
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	<u>Other feedback</u> Some stakeholders expressed the view that the change proposal was not required as they had not experienced any issues while using the MLLR. Guild of Air Traffic Controllers (GATCO) expressed support on condition that there would be no adverse impact on IFR operations or commercial traffic. There was a concern that traffic levels would increase. One respondent considered that the positive change would create a potential safety issue as pilots adapt to the change. A suggestion was made regarding supporting the MLLR with published waypoints for entry and exit. <u>Sponsor's response:</u> Critical safety concerns have been identified that must be addressed and the expiration of the current exemption means that maintaining the status quo is not an option. IFR operations and commercial traffic will not be adversely affected. Manchester and Liverpool airports have confirmed that their operations will be unaffected by the amendments. No significant increase in traffic levels is expected. Restriction for entry to the RA will be published on VFR charts and a communication campaign will be launched to raise awareness of the changes. Introducing specific waypoints would add complexity which is contrary to our goal of maintaining a straightforward and efficient airspace design. <u>Out of scope</u> Some comments made during the course of feedback were noted by the sponsor as being out of scope, however the sponsor has listed them within their submission (Engagement Response Document, para 5.108) and has committed to sharing them with the appropriate areas within the CAA for consideration. <u>Liverpool Airport</u> Liverpool Airport was mapped into the sponsor's tier 1 group of stakeholders. The airport did not submit a formal response to the engagement exercise. In response to a question on this (MLLR Clarification Questions Template) the sponsor confirmed that no formal response had been submitted but that Liverpool Airport has been instrumental in the development of the proposed amendment and collaboration has continued with them up to the point of submission. Their safety assurance work is included within the sponsor's safety case submission. <u>Letters of Agreement (LoAs)</u> Manchester Airport have LoAs in place with smaller airfields located within the confines of the MLLR. The sponsor anticipates these agreements will no longer be required as the airfields will no longer sit within CAS and so they will be cancelled. Agreements, referred to as inter-unit agreements, are in place between Manchester and Liverpool ATC and will require amendments.	
B.5.5	Is the formal airspace change proposal aligned with the conclusions of the consultation response document?	Yes
	The sponsor has demonstrated that prior to the formal engagement period they took on board feedback received from tier 1 stakeholders and used it to help shape the proposals formally engaged upon. For e.g., feedback from the Hazard Identification (HAZID)	

	workshop influenced the restrictions for the proposed RA and proposed adjustment to the width of the area. The sponsor also incorporated into their proposal feedback received from tier 2 stakeholders at the information sessions held in February 2024. This resulted in the proposals for visibility exemptions for NPAS and Helimed services as well as the weight restriction being amended from “Light” wake turbulence to “Small” (i.e. aircraft with a Maximum Certificated Take-Off Mass (MCTOM) of less than 40,000 kg) to allow for the continued operation of Chinook aircraft. No amendments were made to the proposals on account of feedback submitted during the formal engagement window.	
B.5.6	Was a Public Evidence Session required for this proposal? If yes, was any new evidence presented which could alter the conclusions of the consultation response document and/or formal airspace change proposal submission?	N/A
	CAP 1919 does not contain a requirement for a Public Evidence Session to be considered/conducted.	
B.6	RECOMMENDATIONS/CONDITIONS/PIR DATA REQUIREMENTS	
B.6.1	Are there any Recommendations which the change sponsor <u>should try</u> to address either before or after implementation (if approved)? If yes, please list them below.	None
	<u><i>GUIDANCE NOTE:</i></u> Recommendations are something that the change sponsor <u>should try</u> to address either before or after implementation, if indeed the airspace change proposal is approved. They may relate to an area in which the change sponsor is reliant upon a third party to actually come to an agreement and consequently they do not carry the same ‘weight’ as a Condition.	
B.6.2	Are there any Condition(s) which the change sponsor <u>must fulfil</u> either before or after implementation (if approved)? If yes, please list them below.	Yes
	<u>Condition 1</u> – Inter-unit agreements must be finalised prior to implementation, if approved, and submitted to the CAA for review.	
B.6.3	Are there any specific requirements in terms of the data to be collected by the change sponsor for the Post Implementation Review (if approved)? If yes, please list them below.	Yes
	<u><i>GUIDANCE NOTE:</i></u> PIR data requirements concern any specific data which the change sponsor should be instructed to collate post-implementation, if indeed the airspace change proposal is approved. Please use this section to list any such requirements so that they can be captured in the regulatory decision accordingly.	
	<u>STAKEHOLDER OBSERVATIONS</u> As there will be no controlling authority, the CAA expects the Airspace Classification team as the sponsor of this change to adhere as closely as possible to the requirements for a review.	

	The sponsor is required to collate related stakeholder observations (enquiry/complaint data) and present it to the CAA. Any location/area from where more than 10 individuals have made enquiries/complaints must be plotted on separate maps displaying a representative sample of: • aircraft track data plots; and • traffic density plots The plots should include a typical days-worth of movements from the last month of each standard calendar quarter (March, June, September, December) from each of the years directly preceding and following implementation of the airspace change proposal.
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PART C – Consultation Assessment Conclusion(s)		
C.1	Does the consultation meet the CAA's regulatory requirements, the Government's guidance principles for consultation and the Secretary of State's Air Navigation Guidance?	Yes
	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. I am satisfied that these principles have been applied by the change sponsor before, during and after the consultation. I am also satisfied that the change sponsor has conducted this consultation in accordance with the requirements of CAP 1991, that they have demonstrated the Government's consultation principles, and that the consultation has: • Taken place when the proposal was at a formative stage evidenced by the Public Engagement Document CAP 2992 which stated that the aim was to gather feedback and understanding of stakeholders' perspectives on the impact of the proposal. The sponsor stated that information and opinions received through engagement would be used to inform and influence the final airspace proposal. Although no amendments were made to the proposal on account of online feedback received, the sponsor has demonstrated that feedback received both earlier on and throughout the engagement process has directly influenced the development of their proposal and iterative improvements were made that were subsequently presented to stakeholders during the May to August 2024 engagement period. • Presented the consultation material clearly and outlined the potential impacts that needed to be considered – evidenced by the Public Engagement Document which was comprehensive with explanations of technical aviation terms in language that could be understood by a non-aviation audience. Visual depictions of the proposals were included to aid understanding of the information	

	being presented. The supporting engagement materials, notably the Public Engagement Summary, were written in plain language and an easy-to-read format. • Provided a sufficient timeframe to allow considered responses – evidenced by a formal engagement period of 11 weeks which exceeded the expectation for engagement length set out in CAP 1991. Although the engagement period ended in the summer holiday season, this was due to the extension allowed for responses on account of a UK Parliamentary General Election being held on 4 July 2024. The extension was a reasonable response and the overall period allowed was sufficient and proportionate. • Taken into account the product of the consultation. Although the AC team determined that their proposals did not require revision on account of feedback received during the formal engagement window from May to August 2024, this gunning principle is evidenced by the sponsor taking account of feedback received during a variety of preliminary engagement activities which helped to shape the proposals formally engaged upon.
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PART D – Consultation Assessment sign-off			
	Name	Signature	Date
Consultation assessment completed by Airspace Regulator (Engagement and Consultation)			3 Oct 24
Consultation assessment approved by Manager Airspace Regulation			17 Nov 24
Consultation assessment conclusions approved by Head AAA			18 Nov 24