



# Airspace Classification Review

**AMEND**

**MANCHESTER LOW LEVEL ROUTE**

*ENGAGEMENT RESPONSE DOCUMENT – CAP 3027A*

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## CHAPTER 1

# Introduction

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- 1.1 In July 2023 the UK Civil Aviation Authority (CAA) published a detailed investigation<sup>1</sup> of the Manchester Low Level Route (MLLR) as part of its ongoing Airspace Classification Review.
- 1.2 The MLLR, currently designated as Class D controlled airspace (CAS), benefits from a temporary exemption permitting aircraft to fly through it without contacting ATC, provided specific conditions are met. This exemption, crucial for MLLR operations, is set to expire on 31st May 2025. The comprehensive review, which incorporated stakeholder input and safety data analysis, identified safety concerns such as an increased risk of mid-air collisions (MACs). The current configuration of the airspace, along with its temporary exemption status, does not align with our long-term operational objectives to simplify airspace. Consequently, we propose reclassifying and modifying the MLLR to enhance safety and efficiency while aligning it with these objectives.
- 1.3 This document details our engagement strategy, prepared in accordance with the regulatory requirements of the CAA. It also provides a detailed analysis of the feedback received through our engagement exercise and explains how this feedback has informed and influenced our final airspace proposal submission to Airspace Regulation.
- 1.4 Given the anticipated minimal impacts of the proposed amendment, our engagement strategy was designed to be proportionate, allowing all stakeholders to familiarise themselves with the proposal, understand its potential effects, and share their opinions.
- 1.5 For clarity, this proposal to amend the MLLR is being carried out through the Civil Aviation Authority's procedure for reviewing the classification of airspace, as detailed in [CAP1991](#).

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<sup>1</sup> [CAP 2564: Airspace Classification Review: Manchester Low Level Review](#).

## CHAPTER 2

# CAP1991's Stakeholder Engagement Requirements

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- 2.1 While CAP1991 emphasises that the primary consideration for any amendment is its safe implementation and operational workability, it also requires that the implications for airspace users and other affected parties are considered. The procedure includes clear requirements for consulting and engaging with stakeholders to make sure they are adequately informed and have the opportunity to provide feedback on proposed changes.
- 2.2 CAP1991 references the best-practice principles on consultation and engagement set out in CAP 1616. However, it also recognises that the engagement process must be proportionate to the scale and impact of the proposed changes. For relatively minor changes with few impacts, such as this proposal for the MLLR, a more streamlined approach to consultation and engagement may be appropriate. Regardless of the approach, the procedure must remain transparent, and all stakeholder feedback must be considered.
- 2.3 For each proposal, a stakeholder consultation and engagement strategy must be developed, detailing who will be engaged and how. This strategy includes a stakeholder map that identifies those affected, such as airspace users, local communities, and air navigation service providers. It also outlines how stakeholders will be informed, how engagement materials will be developed, and how opportunities for engagement and response will be provided.
- 2.4 While adhering to the CAP1991 requirements, we have made concerted efforts to go above and beyond to ensure the development of an optimum solution. These efforts are detailed further in *Chapter Three: Our Approach to Stakeholder Engagement*. However, key highlights include:
- Holding multiple in-person meetings with both Tier 1 and Tier 2 stakeholders. These face-to-face interactions allowed us to collaboratively build our proposals iteratively and gather direct feedback beyond written responses.
  - Organizing an 11-week public engagement exercise for all stakeholders, exceeding the usual expectations for a change with the anticipated impacts of the amendment.
  - Extending the engagement window when necessary to provide stakeholders with additional time to review and comment on proposals, ensuring a comprehensive and inclusive consultation process.
  - Focusing efforts on stakeholders with lower response rates, such as local communities directly affected by the changes, to ensure their voices are heard and considered.

- Hosting a public information drop-in session where members of the public could freely come and speak to the project team and learn more about the proposed changes.

### **Guiding Principles: The Gunning Principles**

2.5 Throughout our engagement process, we have adhered to the Gunning Principles, which are key principles for fair consultation. These principles include:

- **Consultation Must Be at a Formative Stage:** Ensuring that consultations were conducted when proposals were still at a formative stage, allowing stakeholders to influence the outcome.
- **Sufficient Information:** Providing stakeholders with enough information to understand the proposals and provide informed feedback.
- **Adequate Time:** Allowing adequate time for stakeholders to consider the information and respond.
- **Conscientious Consideration:** Conscientiously considering all feedback received and demonstrating how stakeholders' input influenced the final proposals.

2.6 By following the Gunning Principles, we have ensured that our engagement process is fair, transparent, and effective in gathering valuable stakeholder feedback.

## CHAPTER 3

# Our approach to stakeholder engagement

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- 3.1 At the beginning of our work to amend the MLLR, we undertook a thorough stakeholder mapping exercise to structure our audiences for the engagement process. To maximise efficiency and efficacy, we implemented a tiered approach to prioritise discussions with those most affected by any amendments to the MLLR, ensuring our engagement remains proportionate to the level of impact.
- 3.2 This approach not only ensured the relevance and value of the feedback received at each stage of the amendment design process but also maintained a proportionate focus on our efforts. This facilitated the submission of this safety-enhancing proposed amendment as efficiently as possible.
- 3.3 Additionally, our strategy allowed for an iterative process, ensuring stakeholder support, and incorporating their views at each stage to maximise the benefits of our proposed solution. This iterative engagement guaranteed that stakeholders were supportive of our approach before progressing further in the project.
- 3.4 Ultimately, our goal has been to collect a wide array of perspectives on proposals, and our phased engagement plan ensures that every voice is heard at the most appropriate stage of the amendment process. This iterative strategy has been instrumental in refining our proposals and securing stakeholder endorsement throughout the project.
- 3.5 An anonymised list of our stakeholders and their tiers can be found in Appendix One.

## Tier 1

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- 3.6 Our first-tier stakeholders were the major airports responsible for the controlled airspace in this area. Manchester and Liverpool Airports, along with their Air Navigation Service Providers (ANSPs). Their support for any proposal is integral to the progression of the MLLR amendment process and as such we have looked to work with them from the outset of this project.

## How we engaged

### Pre-meeting discussions

- 3.7 Representatives from our team made multiple visits to both Manchester and Liverpool Airports ATC teams to speak with SMEs regarding the MLLR as part of the research into the production of CAP2654. Through these conversations Manchester and Liverpool Airports were instrumental in aiding our understanding into the issues the MLLR and its traffic presented to ATC units as well as aiding our thought processes on potential solution elements.

- 3.8 A positive relationship was maintained with both airports through regular communication of developments and discussions with other stakeholders both internal and external. As key stakeholders, both airports had insight into our report ahead of publication to fact check and approve the sensitivity of information being published. This allowed all parties to pre plan and consider evaluation of the same suggestions when assessing the potential acceptability of future solutions at the commencement of the “Amend” phase of CAP1991.

### **Project Kick-off meeting (3<sup>rd</sup> October 2023)**

- 3.9 The project kick-off meeting initiated a collaborative working relationship with our Tier One stakeholders. The agenda focused on presenting our rationale behind the project and evaluating the four potential solution elements that had been identified in our review of the MLLR. During the meeting, we thoroughly discussed which options would be most appropriate to advance and which might not be suitable. Our stakeholders provided extensive and valuable feedback, leading to a consensus that all four options would be able to move forward to the next phase of proposal design. This collaborative approach was able to help us make sure that our stakeholders' insights and perspectives played an integral role in the development of our proposal.

### **Project Follow Up meeting (29<sup>th</sup> November 2023)**

- 3.10 The Project Follow Up Meeting focused on addressing concerns previously raised by our Tier One stakeholders, particularly regarding the potential impact an amendment to the MLLR could have on their ACP concerns. We reviewed the initial impact assessment provided by the stakeholders for each solution element, facilitating a detailed discussion on their implications. Following this, we agreed on the options that would be taken forward to a HAZID session. Additionally, we sought and obtained endorsement for the Tiered Engagement Strategy. This meeting was instrumental in ensuring that stakeholder concerns were thoroughly considered and integrated into our project planning and decision-making processes.

### **HAZID Session (8<sup>th</sup> and 9<sup>th</sup> January 2024)**

- 3.11 In January, we held a HAZID session to thoroughly evaluate each of the solution elements. This session was critical in securing Tier One stakeholder endorsement to progress with all four solution elements. During the discussion, stakeholders provided detailed insights into necessary restrictions for the Restricted Area element and ensuring comprehensive risk management. Additionally, we identified a suitable widening to the MLLR that was well-reasoned and met the needs of Tier One stakeholders, particularly Manchester Airport and its ANSP NATS. This session reinforced our commitment to integrating stakeholder feedback into our project development, ensuring that all perspectives were considered in our planning.



## Ongoing direct correspondence

- 3.12 Throughout the project, we have maintained frequent contact between the Civil Aviation Authority and Tier One stakeholders through email, ad-hoc phone calls, and MS Teams meetings. This consistent communication has enabled us to sustain a collaborative approach, ensuring that we could gather immediate feedback on suggestions and potential changes to our proposal as they were suggested by either the CAA or other stakeholders. This proactive engagement has been crucial in addressing concerns promptly and refining our proposals in alignment with stakeholder insights, fostering a transparent and responsive project development process.

## Tier 2

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- 3.13 Our second layer of stakeholders is built around stakeholders that are either regular users of the MLLR and surrounding airspace or are highly informed on how it is used. Level 2 stakeholders include:
- Smaller local aerodromes such as Manchester Barton Airport.
  - Commercial operators and other relevant entities using the MLLR and airspace around Manchester and Liverpool.
  - NPAS and Helimed services.

## How we engaged

### Early Awareness Email (19 October 2023)

- 3.14 On 19 October 2023, we sent an email out to our Tier 2 stakeholders to inform them about our plans to amend the MLLR. This email signposted them to our report into the MLLR and provided a short update on our progress to that point. We also invited stakeholders to contact us with any comments or queries at this time. A copy of the email can be found in our accompanying Engagement Materials document (CAP3027L).
- 3.15 Despite the invitation for direct engagement, no stakeholders took up the offer to speak with us at this stage. However, this early communication was important in setting the stage for our subsequent engagement efforts and ensuring stakeholders were aware of the forthcoming changes and the opportunities to participate in the process.

### Tier 2 Information Session (26 and 27 February 2024)

- 3.16 To further engage with our Tier 2 stakeholders, we organised information sessions at the Civil Aviation Authority's Manchester office. Invitations for these sessions were sent on 12 February 2024, with a follow-up on 21 February 2024. These emails included both an invitation to the sessions and basic details of the proposals, ensuring stakeholders had sufficient information to come prepared.

Both emails can be found in our accompanying Engagement Materials document (CAP3027L).

- 3.17 The events were held on 26 and 27 February 2024 and during these sessions, stakeholders were provided with a comprehensive overview of our proposals for amending the Manchester Low Level Route (MLLR). The agenda included introductions, an explanation of why changes to the MLLR are necessary, and a detailed discussion of our design objectives and proposed solution elements. A copy of the presentation can be found in in our accompanying Engagement Materials document (CAP3027L), but the key points covered in the session were:
- Why the MLLR Must Change
  - Our Design Objectives
  - The Proposed Solution Elements
  - Further details on the specific restrictions for the proposed Restricted Area
  - Next steps
- 3.18 The sessions were designed to be a two-way conversation and included considerable time for stakeholders to ask questions and provide their feedback on our proposals.
- 3.19 A total of **five** stakeholders attended these sessions representing the following organisations:
- Manchester Barton Airport (two attendees)
  - GB Helicopters
  - North West Air Ambulance / Babcock International
  - National Police Air Service
- 3.20 These information sessions were crucial for gathering feedback and ensuring that our Tier 2 stakeholders are well-informed and engaged in the amendment process. The detailed discussions and feedback received during these sessions helped us shape our final proposal before taking it out to the broader public for engagement.
- 3.21 Feedback at the sessions was highly supportive, with robust discussions about the intricacies of the proposal and how the changes would either support or not interfere with their operations. All four solution elements received support, with a particular request for a weight category restriction which would allow Chinooks to continue using this airspace, which is a vital part of one aerodrome's business model. It was noted from airspace users also at the session that Chinooks themselves did not pose a significant risk from wake turbulence. This stance was further investigated by the team and has been corroborated by data from the

CAA Safety Intelligence team. It was confirmed that there have been no wake turbulence encounter reports made in the MLLR in the past three years.

- 3.22 Additionally, stakeholders felt that exemptions would be required for Air Ambulance and NPAS operations. While this was already anticipated, the feedback reinforced and firmed up our thinking on this matter.

## Tier 3

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- 3.23 Our third layer is the broadest group and encompasses the remaining stakeholders that would have an interest in any amendment to the MLLR. This includes:
- Individual members of the GA community
  - Members of the communities under and adjacent to the MLLR
  - Elected representatives at a Local Authority level
  - and any other interested parties.

## How we engaged

### Public Engagement Exercise

- 3.24 The key tenet of Tier Three engagement was through our comprehensive public engagement exercise. This exercise invited all stakeholders to comment on each of the four proposed solution elements through an online survey hosted on the Civil Aviation Authority's dedicated consultation website:  
<https://consultations.caa.co.uk/safety-and-airspace-regulation-group/proposed-amendment-to-mllr/>.
- 3.25 The survey was designed to collect detailed feedback from stakeholders, asking a series of questions about their identity and their views on each of the solution elements. Additionally, we sought their perspectives on safety and the potential impact on communities living under the MLLR. A full list of the questions asked can be found in our accompanying Engagement Materials document (CAP3027L).
- 3.26 Originally planned for an eight-week period from 21 May 2024 to 15 July 2024, the engagement window was extended to 11 weeks to maximise participation. Additional reasoning for this extension can be found in the '*Extension to the Engagement Exercise*' section below.
- 3.27 To support the survey, we developed an engagement document that thoroughly explained our proposal, the rationale behind it, and the process that led us to draft proposal we were presenting. This document was designed to make sure that stakeholders had all the necessary information to make informed comments. Additionally, a summary document was created to present the key points of the proposal in an easily understandable format.

- 3.28 A total of 322 stakeholders have responded to the online survey. A full analysis of the feedback received can be found in Chapter 4: Public Engagement Exercise Feedback.

### Public Information Drop-In Session

- 3.29 To compliment our online public engagement exercise, we held an in person public information drop-in session to allow all stakeholders to come and speak to the project team and learn more. The details of this session were:

**Date:** 4 June 2024

**Time:** 12:45 – 18:15

**Venue:** Hartford Village Hall, 244 Chester Rd, Hartford, Northwich CW8 1LW

- 3.30 Four sets of nine information boards were printed and displayed on tables in the village hall. These can be found in in our accompanying Engagement Materials document (CAP3027L) and provided details on the proposed amendment.
- 3.31 Attendees were able to examine the information boards and engage with members of the project team from various disciplines, who discussed the plans and answered questions.
- 3.32 Although the project team encouraged attendees to complete the survey online, copies of the engagement survey were also made available, allowing attendees to provide feedback on the proposals if they did not have internet access.
- 3.33 25 people attended the public information drop-in session including members of the GA flying community, airports and local residents. Anecdotal feedback received at the session was positive with support for the proposed safety led amendment. Examples of the discussions we had include:
- Several residents attended with initial concerns, mistakenly believing that the proposal related to Manchester Airport's commercial traffic and that it might lead to overflights of their properties. After we explained the history and purpose of the MLLR, as well as the issues and reasons behind the change, these residents supported the proposal terming it "common sense" and "no brainer".
  - A local councillor attended who was initially unaware of the proposal attended the session with some scepticism. However, after speaking with the project team she left happy, recognising the changes as sensible and necessary.
  - A number of pilots, already in favour of the changes, attended to ask specific questions regarding the implementation timeline and how the Restricted Area (RA) would be depicted on VFR charts. Their engagement underscored the strong support for the proposal within the GA community.

- Professional pilots and former air traffic controllers from Manchester attended out of personal interest, seeking to understand the reasons for the changes. Their inquiries were largely technical, and they left with a better understanding of the proposal.
- A representative from a moving map company also attended the session. Although attending in an unofficial capacity, their feedback aligned with the general support we received from the rest of the attendees.
- A local pilot suggested further changes to the northwest corner of the MLLR, near the northeast corner of Liverpool's Control Zone (CTR). These suggestions were considered and evaluated further after the event, however they were not included in the final proposal due to potential conflicts with ongoing FASI work.
- Some residents sought a better understanding of what types of traffic would be using the airspace under the proposed changes. While they understood that commercial traffic was not involved, there was some confusion about what constitutes GA. We used this an opportunity to make this clearer on our dedicated engagement website, as well in any future communications material.

### **How we publicised our engagement exercise**

- 3.34 Prior to the launch of our public engagement exercise, a comprehensive communications plan was developed in collaboration with the Civil Aviation Authority's Communications Department. This plan aimed to maximise awareness of the proposal among relevant stakeholders using the full range of the Civil Aviation Authority's communication channels, while maintaining a proportionate approach. We prioritised balancing the need to inform and engage stakeholders without causing undue concern, given the sensitivities surrounding airspace changes. This was particularly important as both Manchester Airport and Liverpool Airport have significant upcoming airspace change proposals that they will be consulting on shortly, which could heighten sensitivities in local communities.
- 3.35 We therefore used the following communications to publicise our public engagement exercise:
- Local Media Briefing – 21 May 2024:
  - Trade Media Briefing – 21 May 2024:
  - Skywise Alert – 21 May 2024
  - Email to known stakeholders including elected representatives covering the MLLR and its immediate area – 21 May 2024

- 3.36 A copy of all these materials can be found in in our accompanying Engagement Materials document (CAP3027L)
- 3.37 Social media posts across the Civil Aviation Authority's channels were scheduled for May 21, 2024. However, due to sensitivities following an incident on a Singapore Airways flight, all social media activities on the Civil Aviation Authority's channels were temporarily suspended. While we anticipated resuming social media activity as soon as possible, our plans were further disrupted by the announcement of the General Election the day after our launch.

### **Extension to the Engagement Exercise**

- 3.38 On 22nd May 2024, the day after our public engagement exercise was launched, the UK's Prime Minister called a General Election for 4th July 2024
- 3.39 As an arm's length body, the UK Civil Aviation Authority is bound by the pre-election sensitivity restrictions that apply to the UK's Civil Service. As such, all planned communications that we had arranged to be put out up until the election were no longer able to be sent out until after the election.
- 3.40 The engagement exercise was launched successfully, and we had received a good level of feedback from stakeholders through our online survey. However, we were concerned that without the full suite of communications and publicity we had planned, our engagement exercise would not reach all our stakeholder audiences and would prevent us from the receiving all the feedback possible.
- 3.41 It was therefore decided that we would extend the engagement exercise's opening window by three weeks – from 15 July 2024 to 5 August 2024. This extension provides an additional four-week period after the election for further communications and awareness-raising, specifically targeting stakeholders with lower response rates than anticipated, such as local community members living under the proposed RA. According to the engagement requirements outlined in CAP1991, this extension, combined with the seven weeks of previous engagement, is appropriate and proportionate to the scale and impact of our proposed changes. It also ensures that all stakeholders have sufficient time to review and comment on our proposal.
- 3.42 As well as extending the closing date we carried out the following extra communications and publicity to raise awareness of the extension of the engagement exercise after the election period:
- Local Media Briefing – 8 July 2024
  - Skywise – 8 July 2024
  - Social Media – 8 July 2024
  - Social media paid ads specifically targeted at communities under the RA – 8 July 2024 onwards

- Stakeholder Email – 8 July 2024
- Social Media – 5 August 2024

3.43 A copy of all these materials can be found in in our accompanying Engagement Materials document (CAP3027L).

3.44 It is also worth noting that while we had originally planned to contact MPs representing the constituencies under the MLLR / RA, the election presented challenges as there were no MPs in office. Once the election was over, as a public body, we were not in a position to immediately contact all newly elected MPs to raise awareness about the MLLR engagement exercise. However, we are confident that this does not affect the validity of our engagement process when considering our overall efforts to raise awareness. For example, we contacted local authority elected representatives who cover this area, and they were informed through our stakeholder email. Additionally, a local councillor even attended our public drop-in information session in Hartford. This ensured that the necessary information reached all relevant parties and maintained the integrity of our engagement exercise.

### **NW Local Airspace Infringement Team meetings**

3.45 Local Airspace Infringement Team (LAIT) meetings are an integral part of the Civil Aviation Authority's engagement with General Aviation (GA) pilots. The insights and feedback gathered from attendees of the NW LAIT meetings were invaluable in shaping the conclusions of CAP2564.

3.46 These meetings, which are open to the flying community, focus on reducing the likelihood of airspace infringements. In recognition of the valuable contributions made by participants, we ensured that they were regularly informed of our progress and provided with opportunities to give direct feedback on proposed solutions during these sessions.

3.47 We presented our proposals at the following NW LAIT meetings:

- Monday 24<sup>th</sup> July 2023 at Blackpool Airport
- Monday 23<sup>rd</sup> October 2023 at Hawarden Airport
- Monday 22<sup>nd</sup> January 2024 at Manchester Airport
- Thursday 18<sup>th</sup> April 2024 at Manchester Barton Aerodrome

## **Department for Transport**

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3.48 In parallel to our tiered engagement approach, we have also worked closely with colleagues at the Department for Transport (DfT). Particularly concerning the establishment for of the Restricted Area and its associated restrictions. The DfT holds the ultimate responsibility for the implementation of the RA and our close

collaboration with them throughout this process has ensured that it is fully satisfied with the reasoning behind RA's establishment, the legal basis in which this will stand, as well as the broad stakeholder support for this part of our proposal.

- 3.49 Recognising the importance of a seamless implementation process, we have also proactively worked with the DfT to draft the Statutory Instrument (SI) that will formalise the RA. This SI will be published by the DfT following a positive decision on this proposal, with the aim of helping to guarantee that the RA is well known about ahead of its implementation early next year.
- 3.50 It is our view that this engagement has been instrumental in securing the DfT's support for our proposal and confirming that all of the necessary legal requirements are fulfilled ahead of the implementation of this amendment.



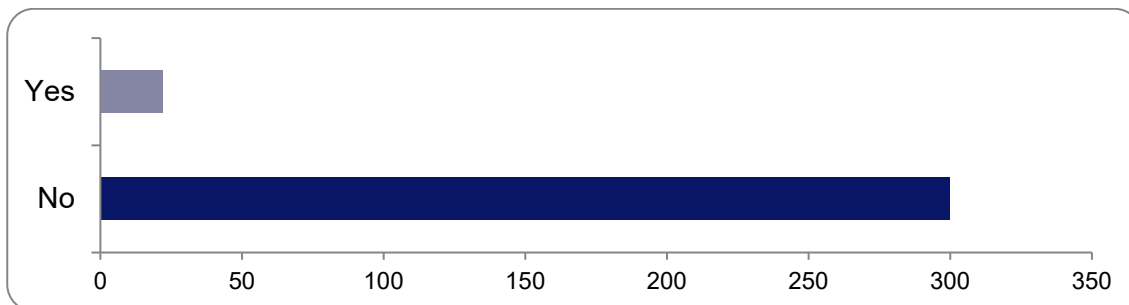
## CHAPTER 4

# Public Engagement Exercise Feedback

- 4.1 We are pleased to report that our engagement exercise received an excellent response, with a total of 322 stakeholders participating. This section provides a comprehensive summary of both the quantitative and qualitative data collected during the consultation process. To facilitate analysis and ensure a thorough response, the qualitative feedback has been carefully themed.
- 4.2 The feedback has been overwhelmingly supportive, affirming the effectiveness of our tiered engagement approach and the robustness of the proposal. This strong endorsement underscores the hard work and collaborative effort that has gone into developing this proposal.
- 4.3 For transparency, all responses that have not been anonymized can be viewed at <https://consultations.caa.co.uk/safety-and-airspace-regulation-group/proposed-amendment-to-mlr>

### Are you responding in an official capacity on behalf of an organisation?

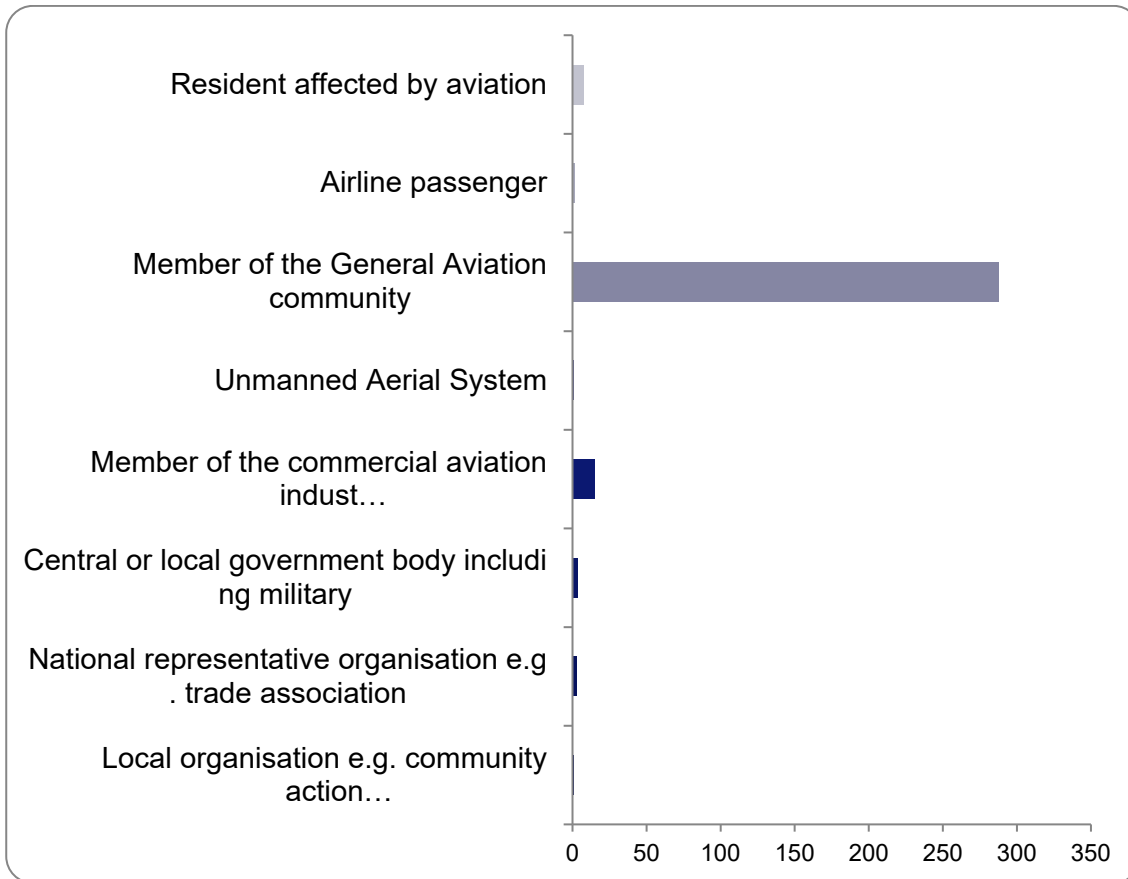
There were 322 responses to this part of the question.



Option	Total	Percent
Yes	22	6.83%
No	300	93.17%
Not Answered	0	0.00%

### Are you answering as:

There were 322 responses to this part of the question.

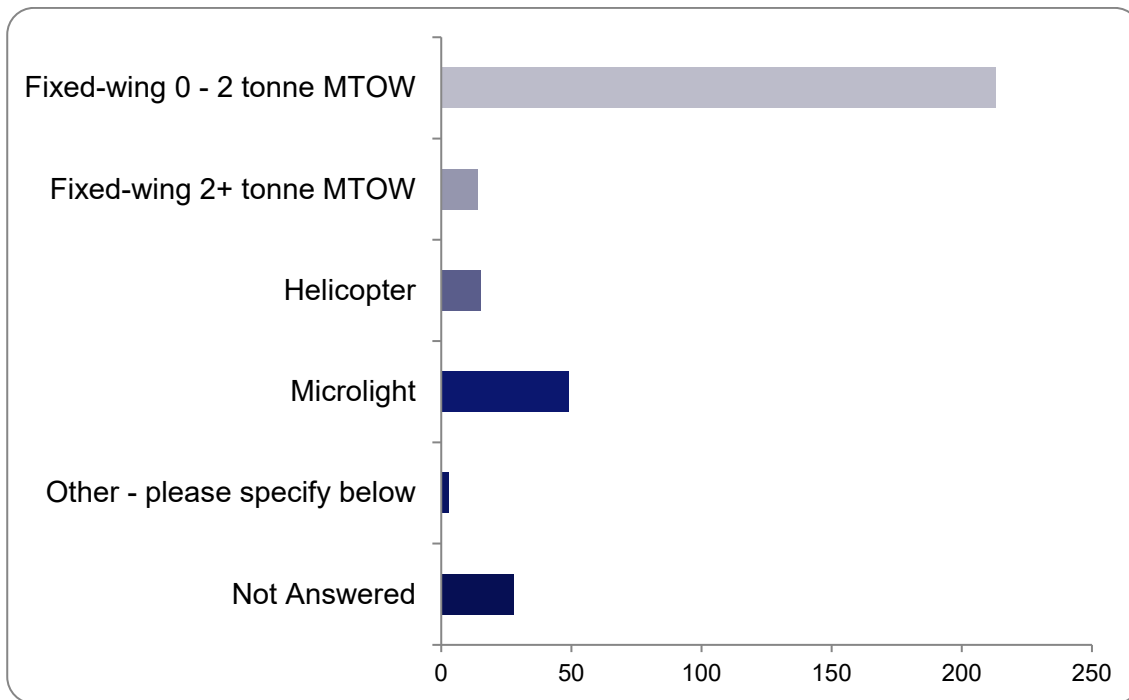


Option	Total	Percent
Resident affected by aviation	8	2.48%
Airline passenger	2	0.62%
Member of the General Aviation community	288	89.44%
Unmanned Aerial System	1	0.31%
Member of the commercial aviation industry	15	4.66%
Central or local government body including military	4	1.24%
Elected political representative e.g. councillor or MP	0	0.00%
National representative organisation e.g. trade association	3	0.93%

Option	Total	Percent
Local organisation e.g. community action group	1	0.31%
Not Answered	0	0.00%

**GA sub-category**

There were 294 responses to this part of the question.

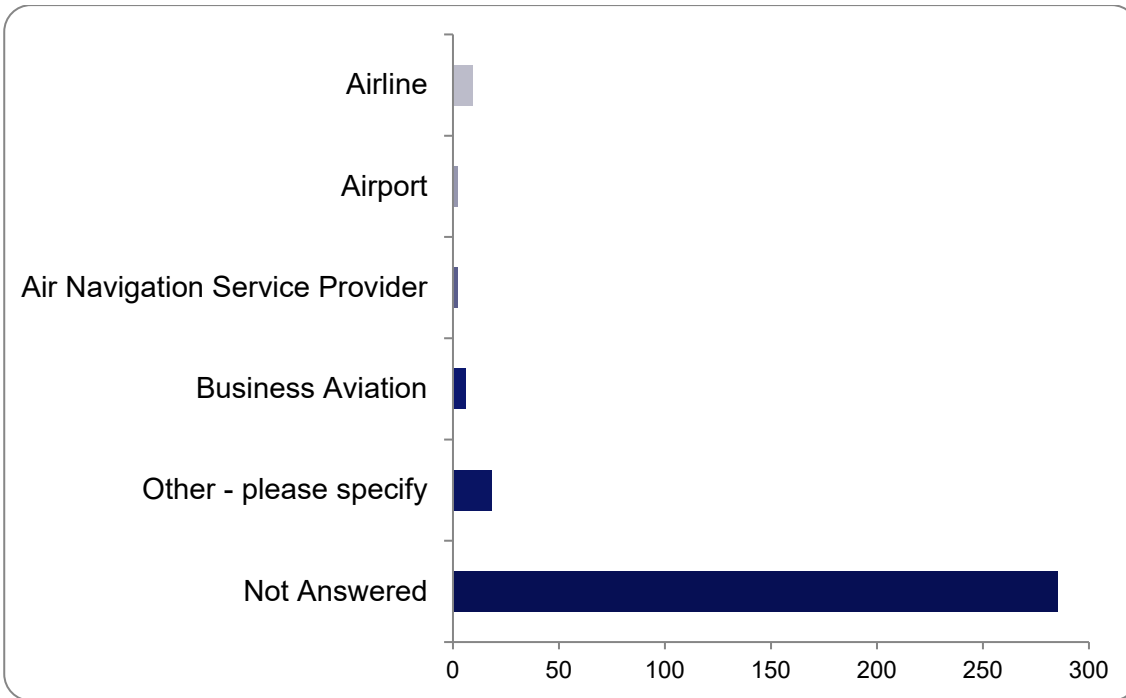


Option	Total	Percent
Balloon	0	0.00%
Fixed-wing 0 - 2 tonne MTOW	213	66.15%
Fixed-wing 2+ tonne MTOW	14	4.35%
Glider	0	0.00%
Hang Gliding and Paragliding	0	0.00%
Helicopter	15	4.66%
Microlight	49	15.22%
Model Aircraft	0	0.00%

Option	Total	Percent
Other - please specify below	3	0.93%
Not Answered	28	8.70%

**Commercial Sub Category**

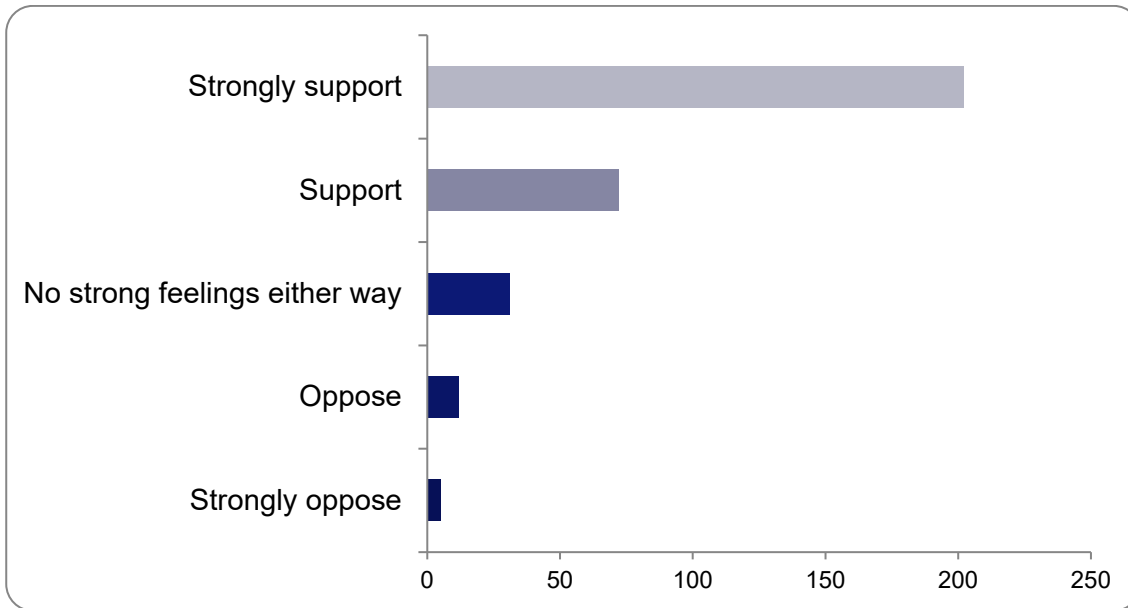
There were 37 responses to this part of the question.



Option	Total	Percent
Airline	9	2.80%
Airport	2	0.62%
Air Navigation Service Provider	2	0.62%
Business Aviation	6	1.86%
Other - please specify	18	5.59%
Not Answered	285	88.51%

**What are your views on the proposal to reclassify the MLLR to Class G uncontrolled airspace?**

There were 322 responses to this part of the question.



Option	Total	Percent
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	0.00%

**Analysis of reasoning provided**

The following table identifies the key themes from the analysis of the reasoning provided by respondents to this question.

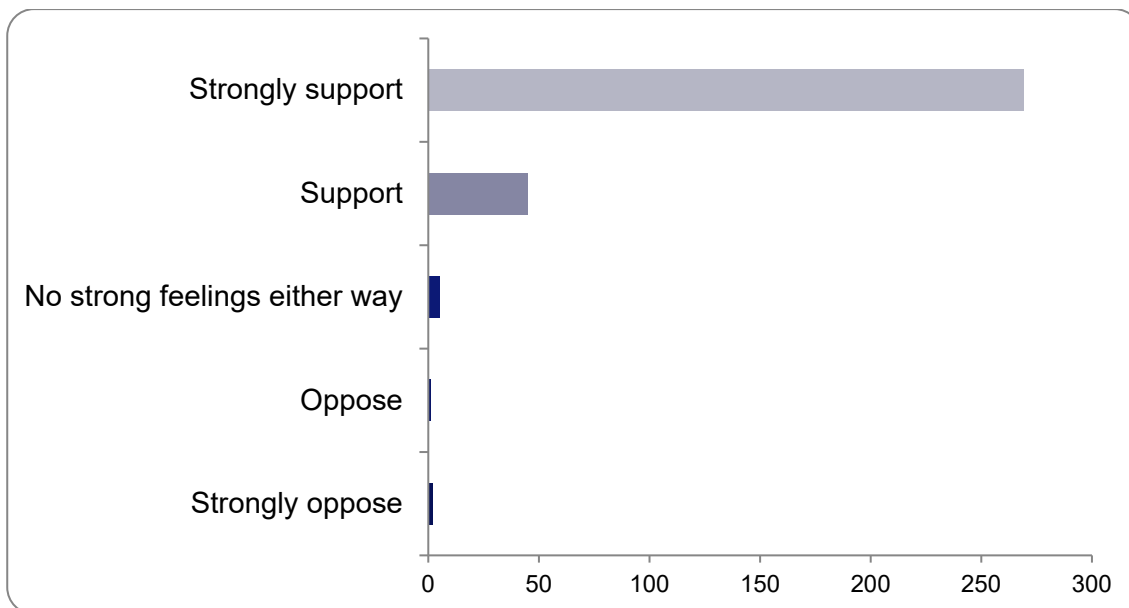
Theme	Number of responses
General support for reclassifying to Class G airspace	61
Anticipated safety improvements in the MLLR	47
Change reflects current usage	31

<b>Theme</b>	<b>Number of responses</b>
Support idea of frequency / squawk / assistance from ATC	21
Improved accessibility for airspace users	18
Anticipated reduction in airspace infringements	15
Simplifies the airspace	13
View that the proposal needs to go further	12
Support for ending current communication requirements	9
Preference for maintaining Class D classification	7
Concerns about decreased safety in the MLLR	7
Environmental and noise concerns	4
Current use without issues	3
Support for further increasing height and/or width of airspace	3
Concerns about commercial aircraft engine-out procedures	2
Support for introducing northerly and southerly traffic flow	2
Suggestion of restrictions on unregistered aircraft in the MLLR	2
Reduction in pilot workload	1
Aircraft should be conspicuous	1
Proposal for a Radio Mandatory Zone (RMZ)	1
Support for local airfield operations	1
Concerns that the change will increase confusion	1
Suggestion for published routes through Class D airspace	1
Concern about high weight restriction	1
Proposal to reclassify as Class E airspace	1

Theme	Number of responses
General opposition to reclassifying to Class G airspace	1

### What are your views on the proposal to raise the altitude of the MLLR from 1300ft to 1500ft?

There were 322 responses to this part of the question.



Option	Total	Percent
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	0.00%

#### Analysis of reasoning provided

The following table identifies the key themes from the analysis of the reasoning provided by respondents to this question.

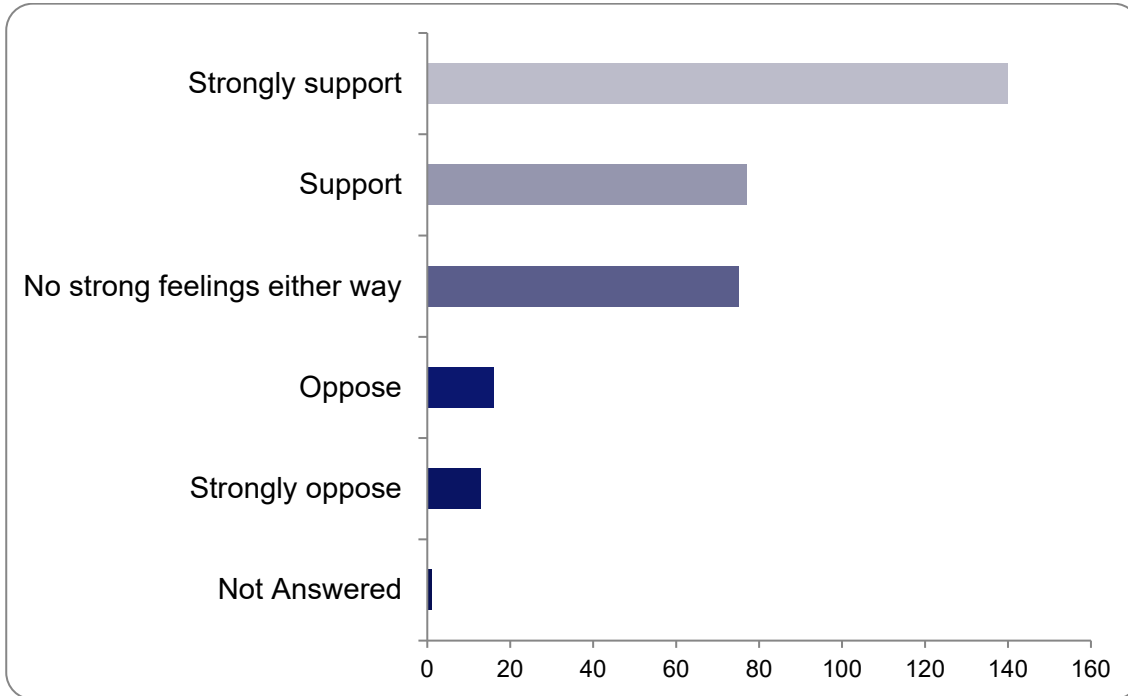
<b>Theme</b>	<b>Number of responses</b>
General support for increasing altitude	104
Anticipated safety improvements in the MLLR	104
Improved risk profile for forced landings	56
Suggestion for further height increases	44
Anticipated reduction in airspace infringements	20
Improvement in noise levels	19
Concerns about commercial aircraft engine-out procedures	2
1,500ft is the maximum altitude before impacting ACPs	2
Improved navigation in the MLLR	1
Reduction in airspace congestion	1
Improved accessibility of the MLLR	1
Support idea of frequency / squawk / assistance from ATC	1
Requirement for Manchester QNH	1
Simplifies the airspace	1
Support for mandatory EC	1
Concerns about pressure settings	1
No threat to commercial traffic	1
Suggestion of restrictions on unregistered aircraft in the MLLR	1
QFE of either Manchester or Liverpool would be a safer option	1
ORS4 No.1496 exemption must be maintained	1
Concerns about commercial aircraft engine-out procedures	1



## What are your views on the proposal to implement a Restricted Area covering the MLLR?

### Speed restriction

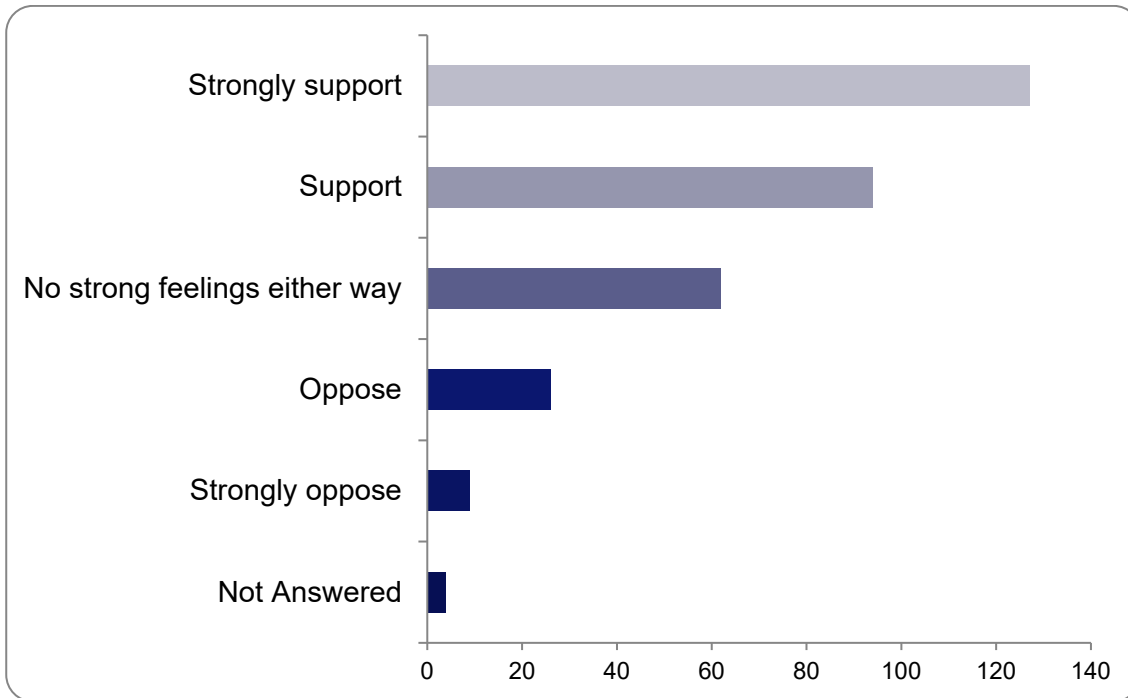
There were 321 responses to this part of the question.



Option	Total	Percent
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%

### 5km visibility

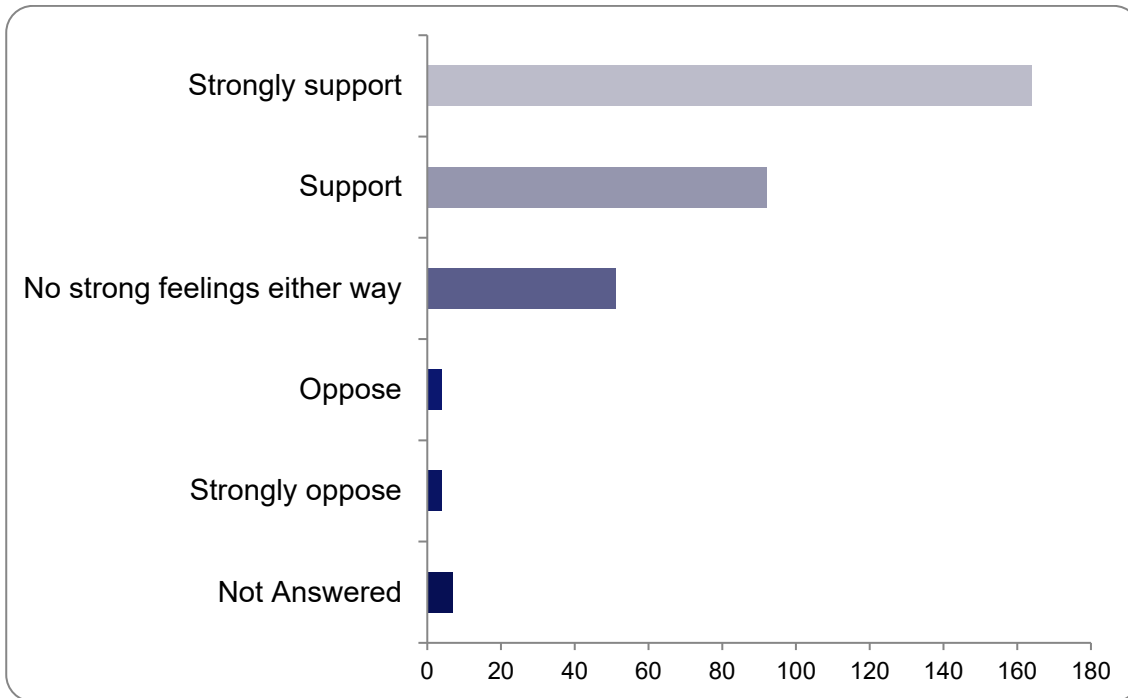
There were 318 responses to this part of the question.



Option	Total Percent
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%

**QNH setting**

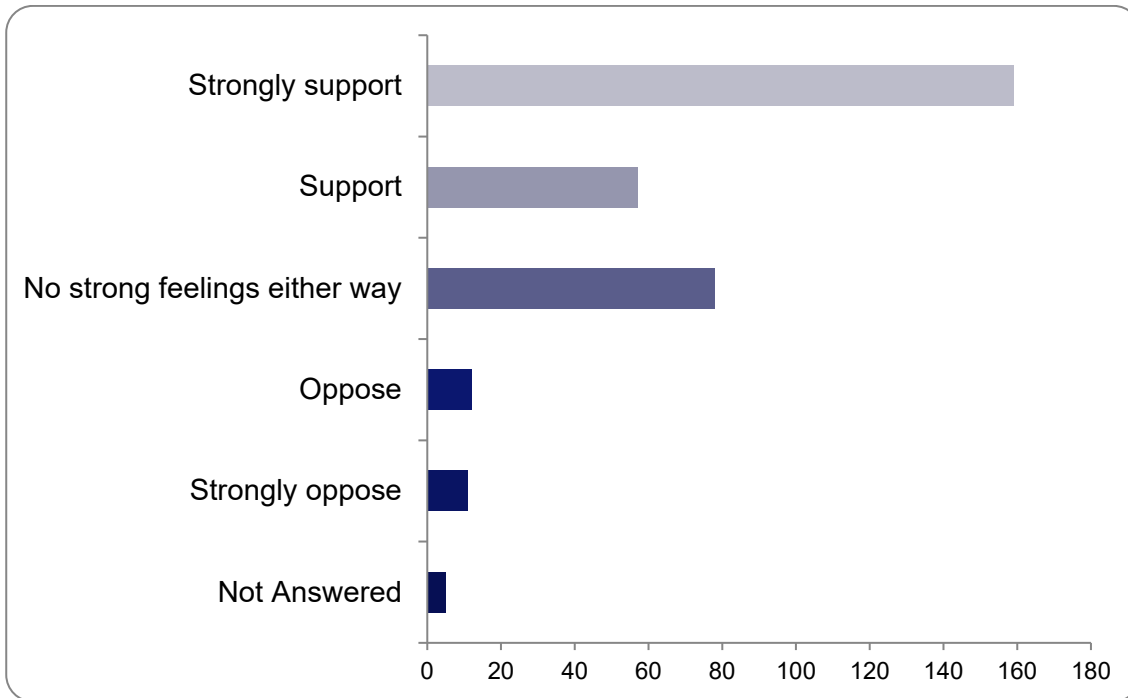
There were 315 responses to this part of the question.



Option	Total	Percent
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%

**Weight restriction of 40,000kg or less**

There were 317 responses to this part of the question.



Option	Total Percent	
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%

**Analysis of reasoning provided**

The following table identifies the key themes from the analysis of the reasoning provided by respondents to this question.

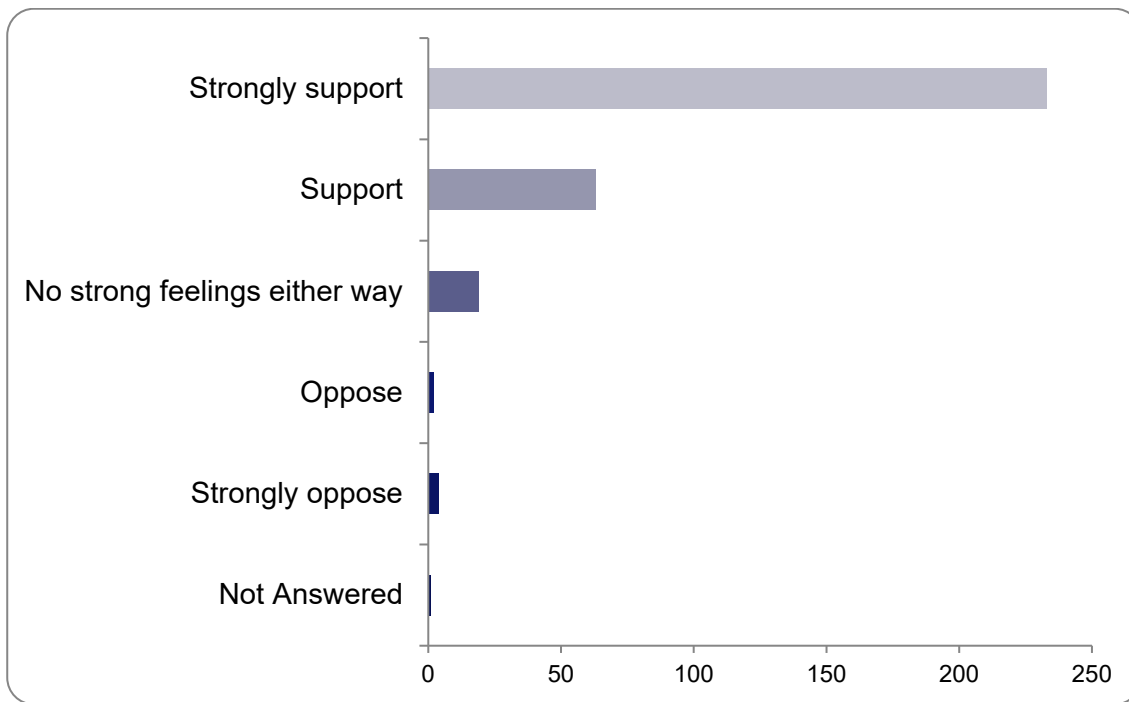
Theme	Number of responses
Support for speed restriction to aid see-and-avoid	48
Support for QNH restriction	41
Proposal for a lower weight restriction	40
General support for restricted area	39

<b>Theme</b>	<b>Number of responses</b>
Support for visibility restrictions	35
Anticipated safety improvements in the MLLR	34
Support for weight restriction	23
General opposition to restricted area	10
Proposal to eliminate or reduce visibility restriction	8
Concerns that restricted area increases confusion or deters use	7
Concern about enforcement	6
Anticipated reduction in airspace infringements	6
Support for maintaining VFR rules	4
Support for mandatory electronic conspicuity (EC)	3
Proposal to extend exemption list to include military traffic	3
Opposition to QNH restriction	2
Speed limit should not be lower than any current MLLR users	2
Support for introducing northerly and southerly traffic flow	2
Potential noise reduction	2
Proposal to implement a Transponder Mandatory Zone (TMZ)	1
Opposition to weight restriction	1
Proposal to apply restricted area criteria across all Class G airspace	1
Concerns about mixing heavy and GA aircraft	1
Proposal for further consultation on restricted area rules	1
Preference for maintaining Class D classification	1
Proposal for a higher speed limit	1

Theme	Number of responses
Concerns about closure of restricted area when others require it	1
Confusion about the definition of the restricted area	1
Proposal for a lower speed limit	1
Concern about the number of schools under the MLLR	1
Proposal for more airspace to be released to Class G	1

### What are your views on the proposal to increase the width of the MLLR to the east?

There were 321 responses to this part of the question.



Option	Total	Percent
Strongly support	233	72.36%
Support	63	19.57%
No strong feelings either way	19	5.90%
Oppose	2	0.62%

Option	Total Percent	
Strongly oppose	4	1.24%
Not Answered	1	0.31%

### Analysis of reasoning provided

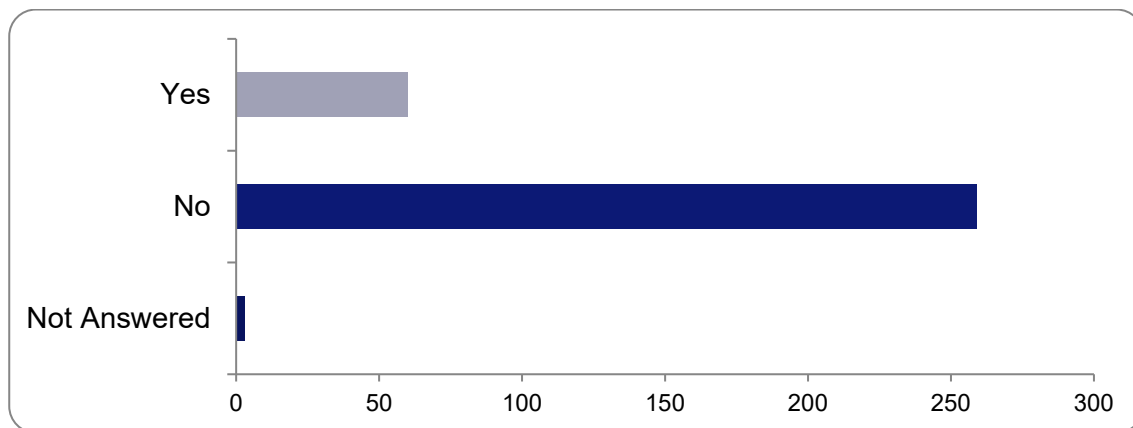
The following table identifies the key themes from the analysis of the reasoning provided by respondents to this question.

Theme	Number of responses
General support for increasing width	93
Anticipated safety improvements in the MLLR	84
Proposal for further widening	23
View that it will result in easier navigation	12
Support for introducing northerly and southerly traffic flow	11
Anticipated reduction in airspace infringements	8
Improved risk profile for forced landings	7
Improvement for local airfields	5
Improves noise impacts	4
Improves accessibility	3
Navigational benefits overstated	3
Proposal for widening to the west	3
Anticipated reduction in pilot and ATC workload	3
Corridor was wide enough already	2
Concerns about commercial aircraft engine-out procedures	2
Proposal for widening to the east	1

Theme	Number of responses
Proposal for more Class G airspace in the UK	1
Does not address choke point towards north of the MLLR	1
Will not have an effect due to GNSS reliance	1
View that the current corridor worked	1
Support for visual reporting points (VRPs)	1
Concerns following previous change of boundary over Warrington	1
Proposal for mandatory GPS navigation	1
General negative comment	1
Proposal for increased height	1
Concerns about existing mid-air collision (MAC) risk	1
Must not be widened any further because of impact on ACPs	1
Support contingent on no adverse impact on IFR operations	1

**Do you have any concerns about the safety of the airspace if the proposed amendment is implemented?**

There were 319 responses to this part of the question.



Option	Total	Percent
Yes	60	18.63%



Option	Total	Percent
No	259	80.43%
Not Answered	3	0.93%

### Analysis of reasoning provided

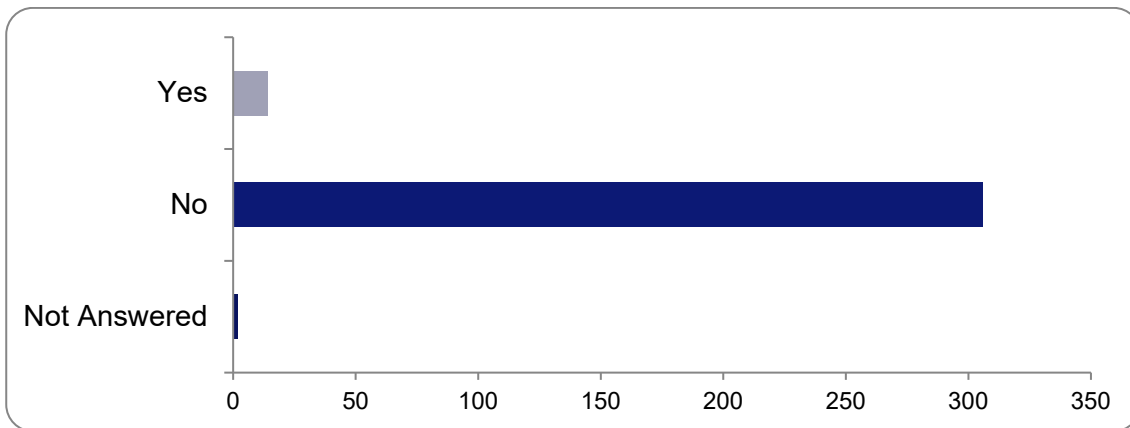
The following table identifies the key themes from the analysis of the reasoning provided by respondents to this question.

Theme	Number of responses
General supportive comment for increase in safety	58
MLLR remains very low and/or narrow thus unsafe	24
Support for introducing northerly and southerly traffic flow	8
Proposal for more extensive changes	7
Support idea of frequency / squawk / assistance from ATC	4
Concerns about making transits more likely to be refused	3
Proposal for mandatory GNSS	3
Proposal for the MLLR to become a TMZ or RMZ	3
Concerns about commercial aircraft engine-out procedures	3
Proposal for using lights to increase conspicuity	2
Concerns about changes increasing MLLR traffic levels	2
Proposal for an education programme	2
Restriction on unregistered aircraft in the MLLR	2
Proposal for mandatory electronic conspicuity (EC)	2
Guidance required for hazards posed by local airfields	1
Proposal for a lower weight restriction	1
Local airfields are hazard - guidance required	1

Theme	Number of responses
Clarity required about 1000' rule conferred by Class D corridor rules	1
Concern about loss of ATC	1
Anticipated reduction in airspace infringements	1
Proposal to avoid population centres	1
Proposal to eliminate speed restriction	1
Proposal to avoid population centres	1
Improvement in noise levels	1

**Do you have any concerns about the impact on local communities or the environment if the proposed amendment is implemented?**

There were 320 responses to this part of the question.



Option	Total	Percent
Yes	14	4.35%
No	306	95.03%
Not Answered	2	0.62%

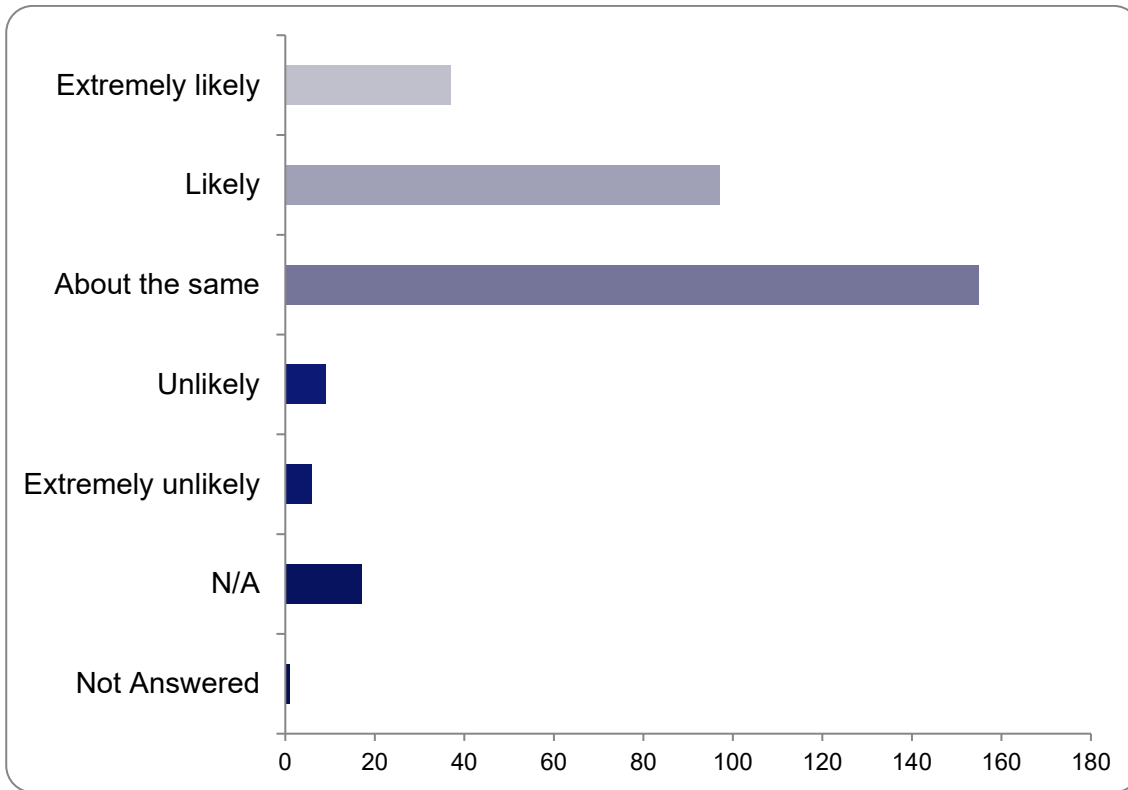
**Analysis of reasoning provided**

The following table identifies the key themes from the analysis of the reasoning provided by respondents to this question.

Theme	Frequency
The proposal will improve noise	71
The proposal will improve the in environmental impact	16
It will not make any difference	16
Safer for local communities	13
Safety is a bigger concern than noise and environment	2
Newly overflown may be unhappy	2
Consultation should have more closely aligned with CAP1616	2
Consultation was impacted by General Election	2
The proposal needs to go further	1
Traffic unlikely to increase following amendment	1
Weight limit should be lower	1
There should be a keep right recommendation	1
Concern about air pollution	1
Most of the area is low populated	1
General positive comment	1
Green belt land is required for safe landing in an emergency	1
Issue with aircraft in Ashcroft not addressed	1

**If implemented, how likely is that this proposed amendment would increase how often you fly in this area?**

There were 321 responses to this part of the question.



Option	Total	Percent
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%

**Are there any additional considerations or issues that you believe the CAA should take into account when deciding on its final proposed amendment?**

There were 140 responses to this part of the question.

The following table identifies the key themes from the analysis of the reasoning provided by respondents to this question.

<b>Theme</b>	<b>Frequency</b>
Support for introducing northerly and southerly traffic flow	26
Support idea of frequency / squawk / assistance from ATC	18
General positive response	10
Proposal for TMZ/RMZ designation	8
Proposal for mandatory electronic conspicuity (EC)	7
Proposal for further reduction in controlled airspace	5
Proposals should be higher/wider	5
Proposal for specific waypoints to improve navigation	3
Consideration for integration of UAVs	3
Proposal to prevent GA IFR traffic	3
Proposal should include improved ATC service from MAN and LPL	2
Proposal for more readily available transits	2
Ensure adequate consultation with commercial aviation	2
Restriction on unregistered aircraft in the MLLR	2
Clarification on ORS4 No 1496 required	2
Concern about the level of refusals of Class D Transit	1
Proposal to make a Surveillance Mandatory Zone	1
Frequent review required	1
Maximum weight should be lower	1
Will reduce risk of infringement	1
Support the rise in height	1
Maximum speed should be higher	1

<b>Theme</b>	<b>Frequency</b>
General negative comment	1
Concern about fire provision in the area	1
Important to make the point that this is small GA aircraft	1
Engage with local stakeholders	1
Mandatory GPS in the MLLR	1
GA excluded because of commercial interests	1
Visibility restriction not appropriate	1
Route should be renamed to avoid confusion with Manchester airspace	1
Military exemption required to avoid increasing workload on crews and controllers	1
Needs to align with good VRPs	1
CAA should be more sympathetic to GA	1
CAA could resource Manchester ATC to provide a radar service	1

## CHAPTER 5

# Our response to the feedback we have received

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## Tier One

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- 5.1 Our Tier 1 engagement played a pivotal role in shaping the final proposal for the MLLR solution. From the outset, we prioritised discussions with key stakeholders, including Manchester and Liverpool Airports and their associated Air Navigation Service Providers (ANSPs) to make sure any proposed changes would be operationally viable and supported by those most directly impacted.
- 5.2 Through a series of meetings and discussions, including the Project Kick-off meeting and the HAZID session, Tier 1 stakeholders provided critical feedback that directly influenced the development of our proposal. For example, during the HAZID session in January 2023, stakeholders contributed to refining the necessary restrictions for the proposed Restricted Area and helped identify suitable adjustments to the width of this area. These discussions ensured that the proposed solution elements were not only safe but also met the operational needs of Manchester and Liverpool Airports.
- 5.3 Concerns raised by Tier 1 stakeholders, stakeholders, particularly Liverpool Airport's request to maintain visibility at 5km, were carefully considered. Through our detailed engagement, we recognised that maintaining this visibility would provide a crucial safety margin to reduce the likelihood of infringements.
- 5.4 The continuous communication between the CAA and Tier 1 stakeholders throughout the project allowed for immediate feedback and iterative improvements to the proposal. This proactive engagement ensured that the design we presented to our Tier 2 and Tier 3 stakeholders was robust, balanced, and aligned with the safety and operational requirements of the airports involved.

## Tier Two

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- 5.5 The Tier 2 engagement, while more focused, provided valuable insights that helped further refine and validate the final proposal for the MLLR. Stakeholders in this tier, including representatives from National Police Air Service (NPAS), Helimed, and local airfields, played a crucial role in ensuring that the proposal met the operational needs of a broader range of airspace users.
- 5.6 Tier 2 stakeholders particularly emphasised the necessity of maintaining exemptions for NPAS and Helimed operations within the future MLLR solution. Their input stressed the critical nature of these services and the importance of ensuring that they could continue to operate effectively under the new airspace structure. As a result, these exemptions were incorporated into the proposal,

ensuring that emergency services can maintain their crucial operations without undue restriction.

- 5.7 Another key contribution from Tier 2 stakeholders was the feedback on the weight restriction. Stakeholders highlighted the need to set a weight limit above what was initially proposed – that associated with “Light” wake turbulence (i.e. 5,700kg) – to allow for the continued operation of Chinook aircraft using Barton Aerodrome to fly through the proposed RA. This feedback was instrumental in determining the appropriate weight restriction, balancing the need to minimise wake turbulence encounter risks and prevent access to larger aircraft, whilst also ensuring that important aircraft operations, like those of the Chinooks, could continue as per today’s operation.
- 5.8 More broadly, the Tier 2 engagement was invaluable in ratifying the work done during the earlier Tier 1 stages. The support and feedback from Tier 2 stakeholders provided additional confidence that the proposed amendments were well-founded and that they addressed the needs of a wide range of airspace users. This validation was critical in moving the proposal forward with strong stakeholder backing.

## Tier Three

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- 5.9 We are encouraged by the support reflected in the overwhelming number of comments received during our engagement exercise. This positive feedback highlights the effectiveness of our tiered engagement approach, which has allowed us to collaboratively design a solution for the MLLR that prioritises safety and garners strong stakeholder support.
- 5.10 Rather than responding to every theme that supports the proposed changes, we have opted to focus this document on addressing more critical feedback and suggestions. This approach ensures that our responses add meaningful value by concentrating on concerns and additional ideas that can further refine the proposal.

## Support for introducing northerly and southerly traffic flow

- 5.11 Several stakeholders across multiple questions suggested implementing specific routes for northerly and southerly traffic flow within the RA. While this option was previously considered and discounted in our initial design process, we revisited it in response to the feedback from our recent engagement exercise.
- 5.12 After thorough reconsideration, we must still conclude that this suggestion is not feasible. The primary constraint is the limited airspace, which prevents the establishment of safe buffer zones between opposite-direction tracks and the surrounding controlled airspace. Furthermore, this approach would conflict with the principles of Class G airspace, where pilots are allowed the flexibility to navigate freely. This flexibility is particularly important for traffic arriving and



departing from Barton Aerodrome, where aircraft would frequently intersect the proposed directional flow, potentially compromising safety.

## **Support idea of continuing designated frequency / squawk / assistance from ATC**

- 5.13 Some stakeholders argued that a designated frequency or squawk should remain mandatory, or that they want to receive assistance from ATC within the proposed solution. However, as we move forward with reclassifying the MLLR to Class G airspace, we are no longer in a position to mandate these elements. Class G airspace is designed to be less restrictive, allowing for greater flexibility and accessibility for all users. As a result, mandatory frequency or squawk codes are not in alignment with the principles of Class G airspace.
- 5.14 That said, airspace users will still have the option to request a service outside CAS from ATC. We acknowledge that the level of service provided in Class G airspace may be less than what some users may want, particularly compared to the previous Class D operations. Nevertheless, the proposal has been carefully designed to maintain safety while transitioning to a more flexible airspace structure. The use of Frequency Monitoring Codes (FMC) is actively encouraged in this area using either the Manchester (7366 or 7367 for solo student pilots with mode C) or Liverpool (5060 or 5067 for solo student pilots with mode C). Either code will allow swift communication from ATC should it be required.

## **View that the proposal needs to go further**

- 5.15 Stakeholders suggested further expanding the MLLR by increasing its height or width. While we appreciate these recommendations, we thoroughly examined these options during our design process.
- 5.16 Further expansion would interfere significantly with either the current operations of Manchester and/or Liverpool Airports, or their ongoing airspace change proposals. Going beyond the current dimensions proposed and requiring changes to existing procedures would also require a more extensive regulatory process, which falls outside the CAP1991 framework.
- 5.17 We are confident that the current design represents the maximum feasible height and width without negatively impacting surrounding airspace operations. However, we do expect both Manchester Airport Group (MAG) and Liverpool Airport to evaluate and minimise controlled airspace to support the designed routes as it completes its design for the FASI programme – something both MAG and Liverpool Airport have already committed to.

## **Proposal to eliminate or reduce visibility restriction**

- 5.18 We acknowledge the concerns raised about the visibility restriction, with some stakeholders feeling that the 5km limit is unnecessary or excessive compared to other Class G airspace in the UK. However, after careful consideration, we

believe that our rationale remains sound and strikes the right balance between safety and accessibility.

- 5.19 The 5km in-flight visibility requirement, carried over from the current ruleset, is designed to reduce the risk of mid-air collisions (MAC) by giving pilots more time to visually identify and avoid other aircraft. This enhanced visibility also supports more accurate visual navigation, which helps minimise the risk of airspace infringements near the controlled airspace of Manchester and Liverpool Airports.
- 5.20 The 5km visibility restriction is also a key element in the safety assurance case mitigations against airspace infringements. Increased visibility means increased situational awareness for pilots both in terms of traffic avoidance and location. This will aid pilots in identifying ground features that can assist in ensuring aircraft remain outside the CAS structures of both Manchester and Liverpool airports.
- 5.21 While this restriction is more stringent than the standard Class G VFR minima, we believe it is a necessary measure to maintain the high level of safety required in this busy and complex airspace.

### **Suggestions for alternative airspace classifications**

- 5.22 While the feedback received was generally supportive there were comments from a small number of stakeholders against the reclassification to Class G airspace and suggestions of alternative classifications. These were either to maintain as Class D airspace or to change to Class E airspace.
- 5.23 We have carefully considered these comments and, as outlined in our Engagement Document, the MLLR will cease to exist because of the expiration of the current exemption listed in [ORS4 No.1596](#). Continued Class D airspace would result in a degradation of safety barriers and likely all but remove service provision due to high workload. There are also a number of safety related issues and risks that we identified in [CAP2564](#) that have to be addressed through this amendment.
- 5.24 We are also required to seek to ensure that the amount of controlled airspace is the minimum required to maintain a high standard of air safety. Our analysis concludes that there is no requirement for the MLLR to remain as controlled airspace under any classification, including Class E. In addition, Class E airspace does not require contact with, or control from, ATC for VFR traffic and only applies separation to IFR traffic. The airspace dimensions are not appropriate to provide separation standards and the lack of control over VFR operations (100% of current MLLR operations are VFR) offers no improvement to safety, or risk lowering, over Class G.

### **Concerns about decreased safety**

- 5.25 We acknowledge the safety concerns raised by some stakeholders and understand that the RA will remain constrained airspace following the

implementation of this proposal. However, it is important to note that the changes we propose will result in risk reduction within the volume formerly known as the MLLR.

- 5.26 A comprehensive safety assessment has been conducted by the UK Civil Aviation Authority, in collaboration with Manchester and Liverpool Airports. This assessment confirms that the proposal meets all safety requirements and is deemed acceptably safe. Moreover, the proposed changes offer real safety benefits.
- 5.27 The four key elements of our proposal—including increased altitude, expanded width, and the introduction of Restricted Area conditions—are designed to enhance safety. The Restricted Area conditions will also improve safety by enforcing appropriate speed limits, weight restrictions, visibility minima, and the use of consistent QNH settings. These measures will reduce the risk of mid-air collisions and emergency landings and ensure safer operations for all airspace users.

### **Environmental and noise concerns**

- 5.28 We appreciate the concerns regarding the environmental and noise impacts of the proposed changes. However, our thorough environmental assessment concludes that the amendment is not expected to have any impact on the environment or noise levels.
- 5.29 The proposal, which raises the ceiling to 1500ft and widens the eastern boundary, will enhance safety without increasing traffic volume or noise. In fact, higher flight altitudes, and the possible greater dispersal of noise due to extra width may reduce noise in areas currently overflown.
- 5.30 While some newly overflown areas may have concerns, our assessment indicates that noise increases in these areas will be minimal, with significant noise events expected to occur less than once a week. In conjunction with the dispersal of noise the overall impact is zero.
- 5.31 The changes will not lead to increased emissions, breaches of air quality limits, or negative impacts on local biodiversity, ensuring environmental standards are maintained while improving airspace safety.

### **Current use without issues**

- 5.32 Some stakeholders have expressed that they currently use the MLLR without issues and view this exercise as unnecessary. However, our comprehensive review of the MLLR identified critical safety concerns that must be addressed. The expiration of the current exemption also means that maintaining the status quo is not an option.
- 5.33 Given these constraints, we have developed a solution that not only improves safety but also ensures that GA access between Manchester and Liverpool Airports is preserved. Our proposal is designed to mitigate the identified risks

while continuing to provide the access to this volume of airspace that users value.

## Concerns about commercial aircraft engine-out procedures

- 5.34 We recognise the concerns raised by stakeholders representing commercial pilots regarding engine-out procedures, particularly for departures using Runway 09 at Liverpool and Runway 23L and 23R at Manchester. This is an important safety consideration, and we have taken it very seriously. To address this, we have engaged with experts across the CAA and collaborated with stakeholders from airlines, Liverpool Airport, and Manchester Airport to thoroughly assess the potential impact.
- 5.35 Specifically, there is a concern that aircraft experiencing an engine failure on departure may need to “level off” and increase speed before resuming their climb, potentially causing them to leave Controlled Airspace (CAS) and pass through the Restricted Area (RA) at an altitude below the lower limit of CAS at 1500ft. It is important to note that in such emergency situations, the provisions of SERA.2010(a) apply, allowing the aircraft to prioritize safety over adherence to RA restrictions.
- 5.36 Information directly received from procedure designers at a long-haul airline at Manchester (therefore considering aircraft with lower climb performance), informed us that the procedure is designed to avoid obstacles on the ground and terrain, airspace is not considered due to the mitigation of receiving an air traffic service. The situation of an aircraft leaving CAS and entering Class G airspace at low level when employing such a procedure is common at virtually all airports in the UK.
- 5.37 Liverpool Airport conducted a detailed safety assessment in consultation with their airline partners. The assessment concluded that 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. The airline partners have reviewed these findings and are content with the assessment, ensuring that the safety of these operations is maintained under the proposed changes.

## Suggestion of restrictions on unregistered aircraft

- 5.38 Some stakeholders suggested imposing restrictions on unregistered (sub 70kg) aircraft within the RA. While we understand the intent behind these suggestions, we do not believe such restrictions align with our objectives for this airspace.
- 5.39 Our goal is to keep the RA as close to standard Class G airspace as possible, while ensuring safety through the necessary Restricted Area. Imposing additional restrictions on unregistered aircraft would not meet our objectives of creating a simplified airspace that supports the principles of the Airspace Modernisation

Strategy. We aim to maintain equitable access for all users, consistent with the characteristics of Class G airspace.

### **Concerns that the change will increase confusion**

- 5.40 We acknowledge the concerns raised about the potential for increased confusion with the proposed changes, particularly regarding the introduction of the Restricted Area. However, one of our primary design objectives has been to simplify the airspace. This is why we have opted for Class G airspace rather than any other airspace structure to make sure it is as simple and easy to use safely as possible.
- 5.41 Regarding the Restricted Area, we understand the concerns about it potentially deterring use or adding complexity. However, Restricted Areas are common across the UK and are proven to work effectively in various locations. They are designed to enhance safety without significantly impacting accessibility. The restrictions for entry to the RA will also be published on VFR charts.
- 5.42 To ensure that all airspace users are fully aware of these changes and can navigate the new structure safely, we will launch an awareness-raising communication campaign. Additionally, 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 therefore will not inadvertently compromise safety.

### **Concern about high weight restriction**

- 5.43 We understand the concerns regarding the chosen weight restriction within the RA, and we want to assure stakeholders that this decision was made after careful consideration and analysis. Balancing the need to minimise wake turbulence while maintaining access for responsible users was central to our approach.
- 5.44 After receiving this feedback, we revisited our analysis and justifications, and carefully reviewed the weight restriction. We have concluded that, when considered in conjunction with the other restrictions to be implemented alongside this element, the "Small" (MCTOM 40,000kg or less) aircraft category remains an appropriate and safe choice which aligns with design objectives behind this proposal.
- 5.45 It is important to remember that this restriction represents an improvement over today's operation of the MLLR. Currently there is no weight / wake turbulence restriction in place to restrict the size of aircraft operating within it. However, our analysis of safety data also shows no reported wake turbulence encounter incidents within the MLLR having been reported (data used from 2021, 22, 23 and 24 up to and including June). We are confident that due to the 140kts speed restriction in place only appropriately sized aircraft operate within the airspace and that this will continue to be the case.

- 5.46 This restriction permits the continued operation of CH47 Chinook helicopters and is not intended to open the RA up to larger aircraft and will officially exclude any aircraft of wake turbulence category “Medium” and above – something not ensured today.
- 5.47 However, this decision will continue to be monitored as part of the ongoing review process after the amendment is implemented.
- 5.48 We felt it is important to include a weight restriction, in addition to a speed restriction, within the airspace to maximise safety without imposing unnecessary burdens on the intended users. The Small category strikes the right balance, ensuring that the RA remains safe while allowing responsible access for those who currently use the airspace.
- 5.49 It is worth noting that the 40,000kg weight limit is also the result of our engagement with local airfields whom indicated that the Small category allows them to continue accommodating aircraft such as Chinooks, which are vital to their operations and growth. This decision supports both safety and the prosperity of local airfields.

### **Concerns about the mandatory QNH**

- 5.50 We appreciate the concerns raised regarding the QNH requirements and a suggestion that Manchester QNH should be mandated. To ensure consistency of altitude readings and to reduce the risk of aircraft inadvertently reducing vertical separation against aircraft within controlled airspace, we still are of the view that that mandating a QNH setting is essential to maintaining an acceptable level of safety.
- 5.51 However, 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. As this is such a small variance the safety assessment of using either QNH was conducted by both Manchester and Liverpool ATC and the suggestion approved and adopted into the proposal.
- 5.52 Therefore, we are confident that using either QNH is appropriate and safe and it remains appropriate to allow individual pilots the flexibility to choose the local QNH that best suits their flight. This approach maintains safety while providing pilots with the necessary discretion to select the most relevant QNH for their operation.

### **Support for mandatory EC / RMZ / TMZ / Surveillance Mandatory Zone / GPS Navigation**

- 5.53 We appreciate the support for implementing mandatory Electronic Conspicuity (EC), a Transponder Mandatory Zone (TMZ), a Radio Mandatory Zone (RMZ), a Surveillance Mandatory Zone, or GPS navigation within the airspace and have looked at these ourselves during the design process. However, equitable access

is a key objective of this proposed amendment, and we do not want to exclude users who currently have access to the airspace.

- 5.54 Introducing such requirements would represent a significant change, potentially limiting access for many users who have not yet adopted the required technology. Without access, users would need to either request an alternative clearance through CAS from Manchester or Liverpool airports, which could significantly increase the workload for ATC, or fly a much longer route around CAS with increased risk of overflying high ground or open water. This is not a direction we wish to pursue.
- 5.55 Additionally, while EC technology is promising, it is not yet mature enough for us to consider making it a mandatory requirement in this airspace. We aim to keep the airspace as accessible as possible while maintaining safety, and we believe that our current proposal strikes the right balance at this time. We encourage future airspace change sponsors to consider the benefits of technological solutions to reduce risk when its appropriate maturity is achieved.

### **QFE of either Manchester or Liverpool would be a safer option**

- 5.56 We appreciate the suggestion to use QFE for either Manchester or Liverpool. However, QFE would increase risk by offering only a reference against a single point of elevation at either airport. QFE gives height above the ground at the point the pressure reading is taken, so is of no use when navigating away from an airfield. Altitude above sea level (using QNH) is how both terrain and CAS structures are defined. If using QFE over QNH, a recalculation would be required to convert height into altitude. The risk of miscalculating this required adjustment to avoid CAS or terrain whilst in the cockpit increases cockpit workload and risk significantly.
- 5.57 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. It ensures better separation from terrain and other aircraft, making it the more appropriate choice for the airspace.

### **ORS4 No.1496 exemption must be maintained**

- 5.58 The exemptions outlined in ORS4 No.1496, including those related to minimum height rules, will remain applicable under our proposed solution. Paragraph 8(c) of ORS4 No.1496 specifies that the exemption applies to aircraft operating in accordance with a notified procedure. Upon approval, we will publish the details of the Restricted Area (RA) in the Aeronautical Information Publication (AIP), including the procedures required for entry and operation within the RA. These published procedures will satisfy the requirements of paragraph 8(c), ensuring that the existing exemptions under ORS4 No.1496 remain unchanged.

## Support contingent on no adverse impact on IFR operations

- 5.59 We can confirm that the proposed changes will not adversely impact IFR operations or commercial traffic. This has been corroborated by both Manchester and Liverpool Airports, ensuring that their operations remain unaffected by the amendments.

## General opposition to restricted area

- 5.60 Throughout the design process we have been keen to keep our airspace design as simple as possible. However, to maximise the safety of our proposed amendment, we believe the RA is necessary.
- 5.61 The restrictions within the RA are carefully designed not to exclude existing users but to ensure that safety is maintained without compromising equitable access. Our objective is to strike a balance between simplicity, safety, and accessibility, and the RA plays a key role in achieving this.

## Concern about enforcement

- 5.62 We can confirm that the enforcement of the RA will be in line with established practices used in other Restricted Areas across the UK. This approach ensures consistency and fairness in how the rules are applied and upheld.

## Proposal to extend exemption list to include military traffic

- 5.63 We have noted the suggestion to extend the exemption list to include military traffic. However, we have engaged with the military throughout our design process and there has been no request from them for such an exemption to the RA's proposed ruleset. Without strong representation and compelling reasoning, we do not consider it appropriate to grant a blanket exemption for all military traffic, particularly given the size and speed of some military aircraft.
- 5.64 It is important to note that many military aircraft will be able to adhere to the new ruleset and can use the RA in compliance with those requirements, ensuring both safety and consistency with the airspace's intended use.

## Proposal for further consultation on restricted area rules

- 5.65 We are confident that our comprehensive engagement exercise effectively communicated the proposed RA rules and afforded all stakeholders ample opportunity to review and provide their feedback. The input received has been invaluable and has been thoroughly considered in shaping the final RA provisions. Therefore, we believe that additional consultation is not necessary.

## Suggested changes to the speed limit

- 5.66 We have received a range of suggestions regarding the speed limit within the RA, including proposals for both higher and lower limits, as well as suggestions to eliminate the speed restriction altogether. After careful consideration, we



believe that maintaining the current maximum speed limit of 140kts IAS is the most appropriate choice.

- 5.67 This speed limit is carried over from the existing MLLR ruleset and is specifically designed to enhance safety by giving pilots more time to employ see-and-avoid techniques, thereby reducing the risk of mid-air collisions (MAC). It has been in operation for a number of years and is widely supported as reducing risk in the MLLR by both the pilot community and ATC.
- 5.68 While the standard Class G speed limit is 250kts, the 140kts limit is also applied in SERA.5001 Table S5-1 note 3, where it is specifically justified as giving a pilot more time to avoid a collision. It provides a safer operating environment within this particularly constrained volume of airspace. It also ensures that the limit is not lower than what current MLLR users are accustomed to.
- 5.69 We believe this speed limit strikes the right balance between maintaining safety and allowing continued access to the airspace for all users.

### **Concerns about closure of restricted area when others require it**

- 5.70 While not strictly in scope of this proposal and our engagement, we do acknowledge the concerns regarding the potential closure of the Restricted Area (RA) when other airspace users require access.
- 5.71 It is our view that this would be highly unlikely, but in the event a temporary closure or modification of access to the RA is required, this would be managed in accordance with established procedures, similar to those used in other RAs across the UK.
- 5.72 Such decisions would be carefully coordinated to balance the needs of all airspace users while ensuring safety remains the top priority. Any closures would be communicated in advance, and alternative routing or procedures would be provided where necessary to minimise disruption.

### **Confusion about the definition of the restricted area**

- 5.73 We are confident that our engagement document was written clearly and effectively, and the RA and the applicable restrictions defined with clarity. This was evidenced by the number of stakeholders who were able to engage with the material appropriately. However, we appreciate all feedback and will continue to strive for clarity in our communications.

### **Concern about the number of schools under the MLLR**

- 5.74 We understand the concerns regarding the presence of schools under the proposed RA and the potential safety implications. However, it is important to emphasise that the primary goal of our proposal is to enhance safety for both aircraft and those on the ground, including in areas where schools are located.

- 5.75 The proposed amendments are specifically designed to reduce the risk of incidents within this airspace, thereby providing greater protection for all individuals beneath the airspace. We believe that this focus on improving safety addresses the concerns raised and underscores the importance of the changes we are implementing.

### **Will not have an effect due to GNSS reliance**

- 5.76 We recognise that some users rely heavily on GNSS (Global Navigation Satellite System) for navigation, which may lead to the perception that the proposed changes will have limited impact. However, the safety benefits of the amendments are designed to be inclusive, supporting both those who use GNSS and those who do not. The reduction in MAC risk is universal to all airspace users.
- 5.77 By implementing the proposal, we will be enhancing the safety of all airspace users, regardless of their navigation methods. These changes ensure that even in scenarios where GNSS might not be available or fully reliable, the risk of incidents is minimised, thereby benefiting everyone operating within the RA.

### **General negative comment**

- 5.78 We acknowledge that not everyone supports the proposed changes, and we understand that some stakeholders have expressed general dissatisfaction. However, it is important to note that a change must occur, given the expiration of the current exemption and the identified safety concerns.
- 5.79 We are pleased that the significant majority of stakeholders have supported the proposal, which has been developed with extensive input and feedback. While this is not a referendum, we have carefully considered every comment and suggestion throughout the process to ensure that the final proposal is strong as possible.

### **Concerns about existing mid-air collision (MAC) risk**

- 5.80 We agree that there is a mid-air collision (MAC) risk within the current MLLR and addressing this risk has been a key objective throughout the entire process. The proposed changes have been specifically designed to reduce the likelihood of MAC incidents, enhancing the safety of all airspace users and ensuring that the RA operates as safely as possible.

### **Concerns about making CAS transits more likely to be refused**

- 5.81 While concerns about the likelihood of transits being refused are arguably outside the scope of this engagement, we acknowledge the concerns raised. It's important to note that Air Navigation Service Providers (ANSPs) will continue to have the same requirements to provide access to Class D airspace as they do currently and as is standard across the country.

- 5.82 The RA is specifically designed to provide users with a safe and accessible crossing in the area, which should help reduce the need for transit requests. However, pilots who experience issues with transit requests can report these incidents through the CAA FCS 1522 form. This mechanism ensures that concerns are documented and addressed appropriately.

### **Concerns about changes increasing traffic levels**

- 5.83 Our expectation is that the usage of the RA will remain approximately the same as the MLLR is today, with no significant increase anticipated.
- 5.84 That said, we acknowledge that the usage of Class G airspace is influenced by various factors that are difficult to quantify and predict. If the proposal is approved and implemented, we will continue to monitor traffic levels to ensure impacts of the change are in line with our expectation.

### **Proposal for an education programme**

- 5.85 We fully support the proposal for an education program and are very aware of the need for airspace users to be conscious of the change and what it means to them.
- 5.86 Following the approval of the proposed changes, we have already planned to implement an awareness-raising campaign for airspace users. This campaign will ensure that all users are well-informed about the new rules and procedures within the RA.
- 5.87 As part of this educational initiative, we will also explore how to incorporate guidance on the hazards posed by local airfields, as suggested by some stakeholders.

### **Proposal to avoid population centres**

- 5.88 The MLLR as it is today already traverses several cities, towns, and villages, making it impractical to reroute the airspace entirely away from populated areas.
- 5.89 The proposed extension does cross into some new areas, but these are predominantly rural. Even in locations where the extension covers more populated areas, the changes are designed to enhance safety, making it safer for those on the ground than it is today.
- 5.90 A key benefit of the proposed changes is the increase in both height and width over that of the MLLR, which provides pilots with greater opportunities to land safely away from population centres in the event of an emergency. This enhancement is designed to improve overall safety for both airspace users and those on the ground.

### **Navigational benefits overstated**

- 5.91 We are disappointed that some respondents feel the navigation benefits of using easily identifiable reference points are overstated. However, the new boundary

has been carefully chosen in accordance with guidelines published in the European Action Plan for Airspace Infringement Risk Reduction. These guidelines recommend that airspace boundaries follow land-based, easily identifiable reference points to enhance situational awareness and reduce the risk of airspace infringements.

- 5.92 In addition, the using of ground based features provides resilience to GNSS failure / jamming / spoofing.

### **Concerns about our engagement exercise**

- 5.93 We acknowledge the comments suggesting that the consultation should have more closely aligned with CAP1616 and that it was impacted by the General Election. However, we are confident in the robustness of our engagement work.
- 5.94 The consultation was conducted in accordance with CAP1991, which, while referencing best practices from CAP1616, allows for a proportionate approach based on the scale and impact of the proposed changes. Given the nature of the amendments, we believe our engagement strategy was appropriate and effective. Additionally, where we identified opportunities to add value and enhance our ability to deliver the best possible solution, we have gone above and beyond the standard requirements, including hosting a public drop-in session to ensure thorough stakeholder engagement.
- 5.95 Regarding the impact of the General Election, we took proactive steps to extend the consultation period to ensure all stakeholders had ample opportunity to participate. This extension, along with our comprehensive communication efforts, helped to mitigate any potential disruptions caused by the election period.

### **Green belt land is required for safe landing in an emergency**

- 5.96 We agree that pilots need suitable space to land safely in the event of an emergency. Much of the MLLR already covers areas that offer viable landing options, and the proposed changes are specifically designed to make it easier for pilots to identify and reach those spaces when needed.

### **Proposal for specific waypoints to improve navigation**

- 5.97 Our primary objective is to simplify the airspace, ensuring it remains accessible and easy to use for all pilots. Introducing specific waypoints would add complexity to the airspace, which is contrary to our goal of maintaining a straightforward and efficient airspace design.
- 5.98 The proposed changes are designed to enhance safety while keeping the airspace as simple as possible, allowing pilots the flexibility to navigate based on their needs without the added burden of specific waypoints.

## Consideration for integration of UAVs

- 5.99 Under the proposed changes, UAVs will be required to adhere to the same rules that apply in all similar pieces of Class G airspace. This ensures consistency of rules across the UK.
- 5.100 More broadly, the Civil Aviation Authority is actively working on a project focused on how new airspace users, including UAVs, can be effectively integrated into UK airspace. This ongoing work will continue to address the evolving needs of all airspace users as new technologies and operations emerge.

## Proposal to prevent GA IFR traffic

- 5.101 There is no proposal to prevent IFR traffic. IFR traffic will be permitted to fly through the RA. However, this traffic must abide by the restrictions in place and only enter when the in-flight visibility is 5km or more.
- 5.102 This improves accessibility over today's operation. IFR flight is not possible within the MLLR due to the requirement for ATC to apply standard separation of 3/5NM or 1,000ft vertically between IFR flights. Class G airspace has no such requirement as it is uncontrolled.

## Frequent review required

- 5.103 The CAP1991 process requires The Civil Aviation Authority to review the amendment one year after its implementation to ensure it is achieving its intended objectives. This review will allow us to assess the effectiveness of the changes and make any necessary adjustments to maintain the safety and usability of the airspace.

## Important to make the point that this is small GA aircraft

- 5.104 We appreciate the feedback highlighting the importance of clarifying that this amendment primarily concerns small General Aviation (GA) aircraft. In response, we updated our engagement webpage and future communications to ensure that stakeholders clearly understand that this amendment does not affect how large commercial jets operate in the area. Our goal has been to avoid any confusion and ensure that the focus remains on the intended changes to the MLLR.

## Engage with local stakeholders

- 5.105 We take the need to engage with local stakeholders very seriously and are confident that our engagement strategy has effectively reached out to all impacted parties. While we have received a relatively low number of responses from local residents, this is likely due to the fact that there are no anticipated negative impacts on them. In fact, the proposed changes may improve safety and reduce noise in their areas, which may explain the limited response.

## Route should be renamed to avoid confusion with Manchester airspace

5.106 Following the implementation of the amendment, the volume of airspace will be renamed according to the relevant Restricted Area number. This change will help clearly distinguish this volume of airspace from that associated with the air traffic operations of Manchester airport and minimise any potential confusion.

## Needs to align with good VRPs

5.107 We recognise the importance of VRPs for navigation, and the new boundaries has been carefully chosen in accordance with guidelines published in the European Action Plan for Airspace Infringement Risk Reduction which recommends that the design of airspace boundaries follow land-based, easily identifiable reference points.

## Out of scope

5.108 We have welcomed all comments and suggestions through the engagement exercise. However, some of the comments are out of scope for this piece of work and have therefore not been able to be used to help shape our proposal. These include:

- Suggestion for published routes through Class D airspace
- Proposal to apply restricted area criteria across all UK Class G airspace
- Proposal for using lights to increase conspicuity
- Proposal for more Class G airspace in the UK
- Issue with aircraft in Ashcroft not addressed
- Proposal for further reduction in controlled airspace
- Proposal should include improved ATC service from MAN and LPL
- Concern about fire provision in the area
- CAA should be more sympathetic to GA
- GA excluded because of commercial interests
- CAA could resource Manchester ATC to provide a radar service

5.109 While these comments have not been able to be used as part of this exercise we will be sharing this with the appropriate areas within the Civil Aviation Authority for their consideration in the future.

**CHAPTER 6****Conclusion and next steps**

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- 6.1 We have now completed our thorough engagement strategy on this proposed amendment to the Manchester Low Level Route, actively engaging with stakeholders to gather their feedback. This feedback has been meticulously processed, analysed, and categorised to ensure all concerns and suggestions were appropriately addressed.
- 6.2 The analysis of the feedback we have received in each of the three tiers of our engagement has led to specific actions and design recommendations aimed at improving the proposed changes. This document outlines how we evolved the initial design based on our engagement, detailing the rationale behind each change, and explaining why some suggestions could not be implemented.
- 6.3 The engagement process was successful, and we do not intend to conduct any further engagement ahead of the Civil Aviation Authority's evaluation of our proposal. We have now finalised the design and this document forms part of our formal application to The Civil Aviation Authority for approval of this design.
- 6.4 The Civil Aviation Authority will evaluate the proposal to determine its merit, with a decision expected in October 2024. Should the proposal be approved, we plan to implement the changes in January 2025.
- 6.5 All published material related to this proposal, along with any further information as it becomes available, will be accessible on the Civil Aviation Authority's website.

## APPENDIX A

# Stakeholder Lists

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### Tier One Stakeholders

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- Manchester Airport Group
- Liverpool John Lennon Airport
- NATS (as ANSP for Manchester Airport)

### Tier Two Stakeholders

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- A2B Aero
- Airbus (Shawarden)
- Apollo Air Services
- Atlas Helicopters
- BAE Systems (Warton)
- Blackpool Airport
- Capital Air Services
- Castle Air
- CHS Helicopters
- East Midlands Helicopters
- Fly Heli
- Halo Aviation
- Heliflight UK
- Helicentre
- Manchester Barton Airport
- Ministry of Defence (MOD)
- Multiflight
- National Police Air Service (NPAS)
- North West Air Ambulance / Babcock International



- PDG Aviation
- SaxonAir
- Sloane Helicopters
- Starspeed

## Tier Three Stakeholders

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### **Skywise**

The UK Civil Aviation Authority's Skywise audience has 12,931 recipients who have signed up to get alerts from the Civil Aviation Authority about airspace issues. This will be span multiple stakeholder groups including individual airspace users, members of the public, representative groups and elected representatives.

### **Airspace Mailing List**

The UK Civil Aviation Authority's Airspace specific mailing list has 1,261 recipients who have signed up for more detailed messages about airspace issues. This includes stakeholder representative groups including General Aviation, airports, airlines, and environmental groups, as well as individual airspace users and elected representatives.

### **Elected Representatives**

The following councillors representing wards under the MLLR were sent our stakeholder email.

#### **Wigan Council**

- Councillor Dane Anderton FRSA
- Councillor Samantha Brown
- Councillor Andrew Bullen
- Councillor Jenny Bullen
- Councillor Danny Fletcher
- Councillor Susan Gambles
- Councillor Susan June Greensmith
- Councillor Jenny Gregory
- Councillor Kathleen Houlton
- Councillor Steve Jones
- Councillor Yvonne Klieve

- Councillor Garry Lloyd BA (Hons)
- Councillor Gena Merrett
- Councillor Scarlett Myler
- Councillor Nazia Rehman
- Councillor Mrs Eunice Smethurst
- Councillor Martyn Smethurst
- Councillor Sylvia Wilkinson

### **St Helens Borough Council**

- Councillor Paul Hooton
- Councillor Janet Sheldon
- Councillor David van der Burg
- Councillor Jeanie Bell
- Councillor Seve Gomez-Aspron MBE
- Councillor Keith Laird

### **Warrington Borough Council**

- Councillor Ghazala Chapman
- Councillor Kenneth Critchley
- Councillor Mark Jervis
- Councillor Sarah Hall
- Councillor Tom Jennings
- Councillor Steve Wright
- Councillor Nigel Balding
- Councillor Russ Bowden
- Councillor David Ellis
- Councillor Alex Abbey
- Councillor Cathy Mitchell
- Councillor Linda Butler
- Councillor Steve Parish
- Councillor Paul Warburton

- Councillor Valerie Allen
- Councillor Carol Benson
- Councillor Wendy Maisey
- Councillor Jean Flaherty
- Councillor Tony Higgins
- Councillor Sagheer Zaman
- Councillor Mark Browne
- Councillor Helen Speed
- Councillor Janet Henshaw
- Councillor Hitesh Patel
- Councillor Jane Whalen
- Councillor Mo Hussain
- Councillor Amanda King
- Councillor Laura Watson
- Councillor Hans Mundry
- Councillor Karen Mundry
- Councillor Denis Matthews
- Councillor Maureen McLaughlin
- Councillor Bob Barr OBE
- Councillor Wendy Johnson
- Councillor Ian Marks MBE
- Councillor Kath Buckley
- Councillor Graham Gowland
- Councillor Claire Lloyd-Fitzgerald
- Councillor Morgan Tarr
- Councillor Geoff Fellows
- Councillor Andy Heaver
- Councillor Craig Lenihan

- Councillor Hilary Cooksey
- Councillor John Kerr-Brown
- Councillor Nathan Sudworth
- Councillor Sue Emery
- Councillor Graham Friend
- Councillor Una Gillham
- Councillor Maureen Creaghan
- Councillor Stephen Rydzkowski
- Councillor Phil Eastty
- Councillor Andrew Hill
- Councillor Rob Tynan
- Councillor Peter Walker
- Councillor Judith Wheeler
- Councillor Siobhan Carr
- Councillor Brian Gallagher

**Cheshire West and Chester Council**

- Councillor Martin Beveridge
- Councillor Stuart Bingham
- Councillor Tommy Blackmore
- Councillor Simon Boone
- Councillor Mandy Clare
- Councillor Andrew Cooper
- Councillor Tom Cooper
- Councillor Felicity Davies
- Councillor Hugo Deynem
- Councillor Lynn Gibbon
- Councillor Charles Hardy
- Councillor Gina Lewis

- Councillor Ted Lush
- Councillor Dan Marr
- Councillor Phil Marshall
- Councillor Sam Naylor
- Councillor Arthur Neil
- Councillor Nathan Pardoe
- Councillor Gaynor Sinar
- Councillor Norman Wright

### **Cheshire East Council**

- Councillor Kate Hague

## **Responders to our previous engagement**

The 109 stakeholders who had responded to our previous Call for Evidence as part of our Airspace Classification Review of the Barnsley region, and commented on the MLLR were sent the stakeholder email regarding our engagement activity.

## **Media List**

The following is a comprehensive list of all the media and stakeholder outlets to whom we shared our media briefings during the engagement exercise. It is important to note that some organizations, such as the BBC, have multiple points of contact representing different geographical areas. Each of these contacts received the briefing to ensure broad and effective coverage across various regions and audiences.

- ADS Advance
- Aerotime.aero
- Air Pilots and the Royal Institute of Navigation – General Aviation Navigation Group (GANG)
- Air Traffic Control Network
- AOA
- AOPA
- Alan Weston
- Altrincham Today
- Andrew Brown
- Angelina Villa-Clarke

- Angus Young
- BBC
- BBC Radio Leeds
- BBC Radio Manchester
- Barnsley Chronicle
- Barnsley Life
- Batley and Birstall News
- Bauer Media
- Beverley Guardian
- Birkenhead News
- Bishop Press
- BMFA
- Bridlington Echo
- Bridlington Free Press
- Brighouse Echo
- British Air Display Association
- British Balloon and Airship Club
- British Gliding Association
- British Hang Gliding and Paragliding Association
- British Helicopter Association
- British Microlighting
- British Parachute Association
- British Rotorcraft Association
- British Skydiving
- Bury Times
- Cameron Balloons
- Charlotte Leeming
- Coastal View & Moor News

- Commercial Ballooning Association
- CPMM Media Group
- Craven Herald and Pioneer
- Darlington Despatch
- David Cockburn
- Dearne Valley Weekender
- Didsbury Post
- Dinnington Guardian
- Doncaster Free Press
- Driffield and Wolds Weekly
- Eagle Star Review
- Easingwold Advertiser & Weekly News
- East Durham Life
- East Durham News
- Epworth Times
- Filey and Hunmanby Mercury
- Flyer
- Flying Farmers
- GB News
- Gazette and Herald (Ryedale & Malton)
- Gazette Newspaper Group Limited
- General Aviation APPG
- General Aviation Awareness Council
- General Aviation News
- Geoff Hill
- Geoffery Boot
- Global
- Gone With the Wind UK

- Goole Times
- Graham Newby
- Grant Shapps
- Grimsby and Cleethorpes Advertiser
- Halifax Courier
- Harrogate Advertiser
- Hartlepool Mail
- Hebden Bridge Times
- Helicopter Club of Great Britain
- Heli Hub
- Historic Aircraft Association
- Holderness and Hornsea Gazette
- Hornsea Community News
- Hull Daily Mail
- Hull is this
- I news
- Ilkley Gazette
- Inspiratia.com
- Instrument Pilot Magazine
- ITV
- JPI Media Publishing
- Jess Stoddard
- John Eagles
- John Edgley
- Joseph Keith
- Kantar
- Keighley News
- Kelsey Media



- Knaresborough Post
- LAA
- Leigh Observer
- Liverpool Express
- Look Local
- Manchester Gazette
- Manchester Mill
- Mark Badminton
- Mike Parker
- My Stockport
- MyBradford
- Nationalworld.com
- Newcastle World
- News Now - Redcar & East Cleveland
- News4Trafford
- Newsquest Northwest
- Nick Wall
- North Yorkshire Live
- Oldham Evening Chronicle
- Oldham Reporter
- Pat Malone
- Paul Mackenzie
- Pooleys
- Pontefract and Castleford Express
- Reachplc.com
- Ripon Commonwealth Press
- Ripon Gazette
- Rotherham Advertiser

- Royal Aeronautical Society – General Aviation Group
- Sailplane and Gliding
- Sara Macefield
- Scarborough Leader
- Scunthorpe Telegraph
- Selby Times
- Sheffield Telegraph
- Sheffield Tribune
- Shildon Town Crier
- Sky
- South Leeds Life
- South West Durham News
- South Yorkshire Times
- Speaker Newspaper
- Spenborough Guardian
- St Helens Star
- Steven Bridgewater
- Stockton And Billingham Life
- Sunderland Echo
- Tameside Report
- Teesdale Mercury
- Teesside Gazette
- Teeside Live
- The Bolton News
- The Bramley
- The Challenge
- The Driffield Times and Post
- The Good Life Surbiton

- The Hull Story
- The Light Aircraft Company
- The LAA
- The Mirror
- The Northern Echo
- The Oldham Times
- The Post Liverpool
- The Press - York
- The Royal Aero Club
- The Scarborough News
- The Sheffield Star
- The Star
- The Westmorland Gazette
- The Yorkshire Reporter
- The Yorkshire Times
- Thirsk Weekly News
- Thorne Times
- Todmorden News
- Tom Kershaw
- Touchdown Radio
- United Kingdom Flight Safety Committee
- Viking FM
- Wakefield Express
- Wally Epton
- Warrington Worldwide
- Wharfedale Observer
- Whitby Advertiser
- Wigan Reporter

- Wigan World
- Withernsea & District Community News
- Yorkshire Bylines
- Yorkshire Evening
- Yorkshire Times