

All NATMAC Representatives

30 July 2014

Dear Stakeholders,

CAA DECISION LETTER

REPLACEMENT OF CLASS F AIRSPACE IN UK FIRs

1. Introduction

- 1.1 The International Civil Aviation Organisation (ICAO) requires that airspace is classified and designated according to the ICAO Air Traffic Service (ATS) Airspace Classifications as detailed in ICAO Annex 2 (Rules of the Air) and ICAO Annex 11 (Air Traffic Services). The UK currently applies the Airspace Classification System subject to such Differences that may be detailed at UK AIP GEN 1.7 (Differences from ICAO Standards, Recommended Practices and Procedures), the European Commission's Airspace Classification Regulation¹ and CAA policy statement 'Application of ICAO Airspace Classification in UK Flight Information Regions' (Directorate of Airspace Policy, 31 August 2010).
- 1.2 Within the UK FIRs Class F is specified for UK Advisory Routes. ICAO Annex 11 states that, where an air traffic advisory service is implemented, this is considered normally as a temporary measure only until such time as it can be replaced by an air traffic control service, through the application of Classes A-E. This requirement is now captured in EU legislation by Commission Regulation EU 923/2012, Standardised European Rules of the Air (SERA), which will be implemented in the UK and all other EU Member States by no later than 4 December 2014.

2. Consultation and proposal overview

- 2.1 On 8 April 2013, the Civil Aviation Authority (CAA) launched a consultation on its proposals for the regularisation of all Class F ADRs as Class E airways that would additionally be notified as Transponder Mandatory airspace by the end of 2014. Such Regularisation was required in response to the findings of the ICAO Universal Safety Oversight Audit Programme (USOAP) inspection of the UK conducted during February 2009 and consideration of the requirements of the Standardised European Rules of the Air. As part of its consultation, the CAA presented five options for the replacement of Class F airspace

¹ European Commission Airspace Classification Regulation 730/2006 dated 11 May 2006

and presented a number of issues for consideration by stakeholders and invited comment on these.

- 2.2 The consultation was originally due to end on 12 July 2013; this was extended to 26 July 2013 to allow stakeholders additional time to consider supplementary consultation material provided by the CAA. Comments from the consultation were examined in detail by CAA staff, which led the CAA to refine its proposals prior to notifying industry of its preferred way forward.
- 2.3 A supplementary consultation was undertaken between 8 October 2013 and 4 November 2013. This was necessary in order to take account of the need for additional Class E 'fillets' in the vicinity of the Aberdeen Control Zone/Control Area which had not been foreseen in the original consultation.
- 2.4 Comments from the supplementary consultation have also been considered in detail by CAA staff; consultation responses led to further refinement of the proposed changes. Together, these have informed the development of the CONOPS² which will form the basis of operations within the subject airspace.
- 2.5 Of the five options for the replacement of Class F airspace that were presented to stakeholders in the initial consultation, the CAA's preferred option was Option 5, which sought to replace all existing Class F airspace by Class E airspace designated Transponder Mandatory airspace in accordance with CAA Directorate of Airspace Policy (DAP) policy for Transponder Mandatory Zones (TMZs), without increase to the lateral or vertical dimensions of current ADRs. However, the CAA acknowledged that consultation could identify circumstances that dictated either the removal of specific routes (primarily on exceptionally low utilisation grounds), reductions to vertical limits of particular routes, or reclassification to a classification more restrictive than Class E (primarily on high utilisation grounds).
- 2.6 Comments from the consultation were examined in detail by CAA staff, which led the CAA to refine its proposals prior to notifying industry of its preferred way forward. A more effective solution was the replacement of all existing Class F airspace by CAS and Class G uncontrolled airspace would be undertaken on a case by case basis. Some minor refinement to proposals was necessary following NATS simulations. The final Consultation Report served to inform industry of the outcomes of the consultations and of the proposed way forward with the replacement of Class F airspace in the UK FIRs.

3. Airspace Change recommendations

- 3.1 Recommendations for change and supporting rationale were summarised and concluded that the revised route structure would be as follows:

3.1.1 Disestablishment in toto: A1D, N160D, N552D, N553D, W928D, W2D

² Concept of Operations

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- 3.1.2 Partial disestablishment and/or redesignation as Class E+TMZ airway: N580D (N580), P600D (P600), W911D (Y911), W958D (Y958), N562D (N562)
- 3.1.3 Retain and redesignate as Class E+TMZ airway: W4D (Y904), W5D (Y905), W6D (Y906), N560D (N560)
- 3.2 Some base levels will be raised to satisfy controlled airspace radar coverage requirements and all routes other than Y904 will have an upper limit of FL195. Y904 has an upper level of FL155 from 17nm north of Aberdeen to permit greater flexibility for local military users' operations. See Enclosure 1 for a map illustrating the definitive recommended changes.
- 3.3 These changes have been developed in concert with the extension to the existing Class C stubs in the Scottish FIR, which facilitate the operation of commercial air traffic climbing through active Military TRAs, and are the subject of a separate Decision Letter.
- 3.4 The re-designated N562D (to N562), is a contingency routeing that was planned to convert to a Conditional Route (CDR2) as a result of the rationalisation and was to be activated when the westerly Class C stub complex was closed due to military exercises in the Fast Jet Area southeast (FJAS). As the available Flexible Use of Airspace procedures will not permit this, it has therefore been decided that N562 will become a permanent Class E +TMZ ATS route between Turnberry (TRN) and Machrihanish (MAC). The route will be managed through the Eurocontrol Route Availability Document (RAD), so that it is only available when military exercises close the westerly Class C stubs, and will provide ScTMA departing traffic additional access to the Oceanic entry points and the North Atlantic route structure.

4. Safety

- 4.1 My primary duty is to maintain a high standard of safety in the provision of air traffic services and this takes primacy over all other duties.³ Development of the change proposals was undertaken in concert with the former Safety Regulation Group's Aerodromes and Air Traffic Standards Division (now absorbed into SARG AAA), therefore safety assurance has been undertaken in an incremental manner.
- 4.2 CONOPS for the Provision of Air Traffic Services has been developed in a similar collaborative manner, with additional participation from NATS, Ministry of Defence and Highlands and Islands Airports Limited. DAATM have produced a briefing note that is designed to provide information and notification to MOD aircrew and ATM/ABM personnel on why the change has been introduced and the conditions associated with the operation of Class E+TMZ CAS.

5. Environmental and economic impacts

- 5.1 As there are no cost associated factors in that there is no additional track mileage to be flown, and there are no forecast capacity gains to be considered as part of this airspace

³ Transport Act 2000, Section 70(1).

change, I decided that there was no requirement for an economic impact assessment to be undertaken. Other than the introduction of the Aberdeen fillets, there is no new airspace to be introduced and consequently, no change to flight profiles. Considering this, I have also decided that there is no environmental impact resulting as a result of this airspace rationalisation.

6. International obligations

6.1 I am required to take into account any international obligations entered into by the UK and notified by the Secretary of State.⁴ No new international obligations arise as a result of the proposal. The revised airspace structure is in accordance with national regulatory requirements and meets extant international requirements originating from ICAO or the European Commission.

7. Consultation with the MOD

7.1 Consultation requirements with the Secretary of State for Defence are set out in the Air Navigation Directions (the Directions)⁵. The MOD has confirmed that it is content with the proposal and I am satisfied that as this airspace rationalisation has been developed with full stakeholder involvement, including Air Surveillance and Control Systems consideration from an air defence priority perspective, there are no national security⁶ issues that need to be considered. Defence Airspace and Air Traffic Management (DAATM) is seeking to identify some operational mitigations in the vicinity of RAF Lossiemouth and I am content that these can be developed through a Memorandum of Understanding or Letter of Agreement if required, in due course, without compromising the proposed CONOPS or the efficiency and effectiveness of the Class E+ TMZ operation of Y904.

8. Regulatory decisions

8.1 I am content that the proposed airspace rationalisation can be safely adopted and that the detail in the CONOPS documentation clearly explains the interaction and responsibilities of both VFR and IFR aircraft operations in the Class E+ TMZ airspace. It is clear that in some cases due to under utilisation of the Class F ADR there was no requirement to replace it with a Class E+TMZ airway and the removal will increase the volume of Class G uncontrolled airspace. It is expected that an appropriate ATSOCAS will be provided to the limited quantity of IFR air traffic that continues to operate in the vicinity of those routes that have been removed. This service is expected to be provided by either NATS Prestwick Centre controllers or LATCC Mil. As a consequence, I am content that airspace efficiency will not be adversely affected by the rationalisation and the needs of all airspace users will be met.

8.2 In this context, it will be necessary to ensure that, prior to implementation, an appropriate Letter of Agreement is in place between the BGA and NATS/Inverness to address gliding


⁴ Transport Act 2000, Section 70(2)(g).

⁵ The Civil Aviation Authority (Air Navigation) Directions 2001 as varied by the Civil Aviation Authority (Air Navigation) (Variation) Direction 2004.

⁶ Transport Act 2000, Section 70(2)(f).

activity in the vicinity of N560 between the northern edge of the Scottish TMA and Inverness.

- 8.3 Overall, I am satisfied that the revised option that has been selected provides the most pragmatic solution and adequately addresses the needs of all stakeholders, having regard for the regulatory requirement to remove Class F as it is currently employed in the UK.
- 8.4 The intention is that the revised airspace will become effective from 13 November 2014 (AIRAC12/2014). My staff will review the effectiveness of the arrangements 12 months after introduction and the results of this review will be published.

A handwritten signature in black ink that reads "Mark Swan". The signature is written in a cursive style and is underlined with a single horizontal line.

M Swan
Director

Enclosure:

1. Map showing Class F Airspace Rationalisation

Class F Rationalisation

30/7/2014 v4

