

# **IRISH SEA AIRSPACE CHANGE PROPOSAL**

## **Stakeholder Consultation Feedback Report**

**October 2011**

**NATS Ref: 4758/RPT/03**



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## 1. Introduction

- 1.1 This document provides feedback to stakeholders who participated in the consultation undertaken by NATS for the Irish Sea airspace change proposal (ACP).
- 1.2 Consultation started 15th April and ended 22nd July 2011, a period of 14 weeks.
- 1.3 This document should be read in conjunction with the consultation documents available in both English and Welsh from [www.consultation.nats.co.uk](http://www.consultation.nats.co.uk).
- 1.4 Section 2 of this document describes feedback on the technical details of the proposal, including aviation issues, whilst Section 3 describes the environmental feedback. Next steps are described in Section 4.
- 1.5 NATS sent notification of this consultation to more than 70 representatives of the local community and aviation industry including:
  - o The National Air Traffic Management Advisory Committee (NATMAC),
  - o Airports and airlines potentially affected
  - o Officers of AONBs and National Parks potentially affected
  - o County, district and borough councils<sup>1</sup> potentially affected
  - o Members of Parliament and the Welsh Assembly representing constituencies potentially affected
- 1.6 The consultation was made available publicly on the NATS website where various groups and members of the public accessed the consultation information and provided responses.
- 1.7 In total 40 Responses were received of which 16 included objection to one or more part of the proposal.

## 2. Technical Details and Impacts Relating to the Aviation Community

- 2.1 This part of the feedback document discusses responses received on the technical details of the changes; as such it contains technical terms and commonly used aviation abbreviations. Routes are described using the alphanumeric route designators and three/five letter name codes for significant points (referred to in CAPITAL letters), these designators and points are described in sections ENR 3.1, ENR 3.2, ENR 4.1 and ENR 4.4 of the UK Aeronautical Information Publication which can be found at <http://www.nats-uk.ead-it.com>. (A beginner's guide to the UK airspace system can be found at Appendices C and D of the consultation document which is still available at [www.consultation.nats.co.uk](http://www.consultation.nats.co.uk). These explain the basic principles of air traffic control and the airspace structure in the UK.)
- 2.2 This airspace proposal is split into 5 distinct sub proposals and the consultation sought feedback specific to each sub proposal. The following sub sections provide a summary of aviation community responses to each of the sub proposals.
- 2.3 A total of 24 responses were received on aviation issues, of which 10 included objections to one or more sub proposal, four included support for one or more parts and 10 made no objection or no comment.

### Sub Proposal 1: Classification of lowered L975 CAS at FIR boundary

- 2.4 Objections were received to the proposed lowering of CAS to 3500ft at the FIR

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<sup>1</sup> The consultee list for potentially affected areas was drawn up with reference to the DLTR 2002 Guidance to the CAA on environmental Objectives Relating to the Exercise of its Air Navigation Functions (Ref 1). This indicates that consultation for changes higher than 7000ft above ground level is a requirement where there is potential impact above Areas of Outstanding Natural Beauty or National Parks.

boundary being designated as Class A, as this would exclude all General Aviation (GA) traffic flying VFR.

- 2.5 NATS has considered this feedback and the final proposal will be for this airspace to be Class C rather than Class A. This is the same classification as the existing L975 CAS between LIFFY and GINIS. The proposed airspace would be delegated to Dublin ATC (as per the L975 CAS in existence today). Dublin ATC have stated that access for GA from 3500ft – FL75 would be managed as it is today for traffic wishing to cross the existing L975 CAS. Crossing/joining traffic could expect to obtain a clearance on a regular basis, as they do today. Aircraft given a clearance will be given tactical headings determined on a flexible basis dependent on the situation at the time.

### **Sub Proposal 1: CAS Extension into EGD201B area**

- 2.6 Ongoing discussion with the military and airspace regulators for both the UK and Ireland has identified that no lateral extension of L975 airspace is required to protect the point merge legs at the FIR boundary. The proposed 3500ft CAS to the west of EGD201B will therefore be limited to the existing L975 lateral boundary, and not extended southeast into EGD201B as shown in the consultation document.

### **Sub proposal 2: Expansion of class A below FL195**

- 2.7 Some responses raised objections to the general expansion of Class A airspace below FL195 over the Irish Sea.
- 2.8 In generating this proposal NATS has considered the balance between providing the protection to civil air traffic afforded by Class A airspace against the access requirements for GA and military OAT. In the case of sub proposal 2 NATS considers that an appropriate balance has been struck between the release of significant volumes of Class A airspace and the establishment of new Class A airspace.
- 2.9 Utilising Class C, D or E airspace for L70/L975 was suggested to enable VFR access with ATC clearance. NATS considers these classifications as an option where there is a realistic expectation that ATC clearances can be given. L70 and L975 airspace over the Irish Sea is controlled by NATS' Isle of Man & Wallasey ATC sectors. The high ATC workload associated with these sectors means that clearances through this airspace would not be given in normal circumstances, and that the calls for clearances would themselves produce unacceptable additional workload to the ATC function. Note that the high workload does not relate only to low level traffic in the airspace in question, but also to traffic at higher levels but nonetheless controlled by the same ATC sector.
- 2.10 Airspace complexity is also a consideration: complicated airspace boundaries where the classification varies from segment to segment increases the risk of pilot and/or ATC error. This in turn increases the risk of infringements of CAS by uncontrolled aircraft which can lead to loss of separation.
- 2.11 Note that the Class C at the boundary (as per Sub proposal 1) is possible because the provision of ATS is delegated from NATS to Dublin ATC rather than Isle of Man Sector, and would match the existing adjacent Class C airspace controlled by Dublin ATC.

### **Sub proposal 3: Impact on recreational gliding**

- 2.12 The British Gliding Association (BGA) indicated that access should be limited to the period 2000-1000 to prevent impact on recreational gliding.

- 2.13 The proposal will include the development of the existing Letter of Agreement (LoA) with the BGA which will enable gliders to close (U)Y124 so that they can access the Welsh Gliding areas. NATS considers this sufficient mitigation for recreational gliding in the area.
- 2.14 The BGA also highlighted that the extant LoA for access to the Welsh Gliding areas requires review, regardless of this proposal. As this is an issue with extant procedures it is not part of the proposal per se, and will be picked up via NATS/BGA engagement outside this proposal.

### **Sub proposal 3: Classification of Y124 CAS**

- 2.15 Objections were received to the proposed stepped CAS bases for Y124 to the west of Anglesey.
- 2.16 This is proposed to provide a known environment for Dublin departure flows to the east. This traffic flow will be controlled by the NATS Isle of Man ATC sector, which is a busy sector (see paragraph 2.9). The CAS steps are at FL115 at the FIR boundary raising to FL145 west of Anglesey to cover the climbing departure profile. No additional CAS is required for the overland portions of (U)Y124 as it would operate in the existing Class C above FL195.
- 2.17 Below FL115 the proposal has been adapted to ensure Class C in the airspace where provision of ATS is delegated to Dublin ATC, enabling GA transits across the FIR boundary (see paragraph 2.5). NATS considers this to be sufficient to ensure the safe operation of GA crossing the Irish Sea, and that there would be little impact on GA operations by preventing transits in this area above FL115. Therefore for the reasons of workload and complexity stated in paragraph 2.9, NATS considers the proposed Class C steps to be appropriate for Y124.

### **Sub Proposal 4: Impact on Warton and Woodvale**

- 2.18 Objections have been received indicating that the proposed airspace would impact on BAE Warton operations, and MOD operations from Woodvale. NATS is in continued discussion with BAE and MOD, and is investigating options around the airspace definition/clawback procedures to ensure the impact on these units would be manageable.
- 2.19 Should a solution not be found that completely satisfies all parties, the proposal will present to the CAA the option favoured by NATS, plus any alternative(s) identified through the ongoing discussions. If the CAA determines that the option favoured by NATS is not justified, the alternative(s) will be put forward. Should no satisfactory alternative(s) be identified then sub proposal 4 may be withdrawn from the proposal until such time as further negotiations can take place.

### **Sub Proposal 4: Classification of proposed L70 CAS**

- 2.20 General objections were received regarding the proposed classification of this airspace as Class A. The proposed L70 airspace would be controlled by the NATS Wallasey sector. Issues around workload and the ability to provide clearances for Wallasey sector are discussed in paragraph 2.9. With the potential exception of Warton and Woodvale operations, NATS does not consider there is a high level of demand for GA access to this airspace and therefore does not consider access to be a significant issue for the GA community in general.

### **Sub proposal 5: Classification of proposed L6 CAS stubs**

- 2.21 Objections were received to the proposed extension to Class A airspace in terms of the

impact on GA access, in particular, the FL145-195 stub south of Wallasey in the vicinity of Mold.

- 2.22 This airspace would be controlled by the Wallasey sector which controls a confluence of routes from north, south, east and west. It is not planned that this airspace would be used by a regular traffic flow; however, the additional space would provide the Wallasey sector with increased flexibility to deal with complex traffic scenarios that occur when a number of aircraft arrive at the sector at the same time. This is referred to as “bunching” which can be a contributory factor in the development of incidents.
- 2.23 While there is no history of incidents relating to workload around Wallasey, traffic through this area is demonstrably complex and is expected to grow in volume (and therefore complexity) in coming years. NATS continually seeks improvements that will benefit the underlying safety of our airspace and considers that the increased flexibility afforded by the proposed Class A stub is justifiable.

### **3. Environmental Issues**

- 3.1 A total of 16 responses were received on environmental issues, of which 6 included objections to one or more sub proposal. There was one letter of support and the other 9 stated no objection/no comment.
- 3.2 This section considers the issues raised with regard to Sub Proposals 3, 4 and 5 in turn.

#### **Sub proposal 3: Visual, noise and tranquillity impacts**

- 3.3 Objections were received on the basis that the proposal would increase noise and visual impact (in particular from contrails) which would impact tranquillity in the National Park and neighbouring Areas of Outstanding Natural Beauty (AONBs). Objections stated that these effects have not been measured, and suggested that they have therefore not been taken into account.
- 3.4 NATS accepts that the proposal has potential to affect tranquillity; however we contend that the impact will be relatively low from aircraft above Snowdonia and the neighbouring AONBs at more than 3½ miles high. The response to the consultation has not identified any practical measures by which this may be achieved.
- 3.5 The CAA does not provide formal guidance on measurement of potential impacts on tranquillity and visual intrusion, nor is there a widely recognised methodology that can provide the objective tranquillity analysis for high level airspace changes such as this. We note that the Campaign for the Protection of Rural England (CPRE) has undertaken tranquillity mapping for England; however, the whilst method employed does account for aircraft noise, the measure of noise for high flying aircraft is relatively coarse and would not provide the fidelity to assess high level proposals such as this.
- 3.6 The effect on visual, noise and tranquillity a consideration in the design process, and NATS does seek to position routes over the sea where possible. The options in this case are, however, limited – see para 3.12.

#### **Sub proposal 3: Insufficient environmental justification**

- 3.7 Objections were received on the basis that the quantified CO<sub>2</sub> savings were not sufficient to justify the potential impact on tranquillity.
- 3.8 The environment section of the consultation document states that NATS has been unable to quantify all the potential CO<sub>2</sub> benefits. This is because the airspace would be used by traffic from the north Atlantic region where routes are heavily dependent on weather patterns. Other factors such as operators choosing to avoid busy areas, or areas in which Air Traffic Control charges differ, also increase uncertainty. Determining typical tracks upon which to base CO<sub>2</sub> modelling is therefore difficult to

achieve with any degree of confidence in the overall result.

- 3.9 As a result NATS focussed analysis on the most predictable flow of traffic expected to use the airspace – Dublin departures. A typical flight using the proposed route would save around 45kg of CO<sub>2</sub>. This same flight would also have a potential effect on tranquillity as it overflies the National Park/AONBs at over 3½ miles high. NATS contends that on a flight by flight basis the CO<sub>2</sub> benefit is justification for the potential impact on tranquillity of that same typical flight over flying the National Park/AONBs at over 3½ miles high.
- 3.10 It should be noted that that this is only part of the justification for change; the change also provides additional benefits in terms of reducing fuel costs and the likelihood of delay for aircraft crossing the Irish Sea. These airspace management considerations are described in Part B of the consultation document and form part of the case for progressing with the proposed changes.
- 3.11 NATS considers the overall balance of benefits merits progressing the (U)Y124 proposal as presented in the consultation document.

### **Sub proposal 3: Lack of 'options'**

- 3.12 This proposal builds on the existing airspace structure. The existing airspace consists of two routes (U)L975 and (U)L70 that cross the Irish Sea between Dublin and the Liverpool/Manchester area. These routes are predicated on the direct route between the fixed points of Dublin and the Liverpool/Manchester area. It is beyond the scope of this proposal to attempt to realign this main east-west axis.
- 3.13 The proposal is to provide a third route, to allow for a more efficient distribution of traffic and separation of southbound traffic flows from those heading east or south east. A route adjoined to the existing airspace to the south is the only practical means of achieving this.
- 3.14 A route north of Snowdonia would not provide safe separation from the existing (U)L975 route. Routes further south would still overfly parts of Snowdonia, and would require major route changes over central England to accommodate the flow joining the existing airspace structure in a completely new area. By virtue of being parallel and directly south of the existing routes the proposed (U)Y124 integrates into the existing structure with minimal impact.
- 3.15 For these reasons there are no acceptable options for achieving the desired outcomes. The 'do nothing' option exists, however NATS considers that on balance the change is justified.

### **Sub proposal 3: Environmental levy on passengers**

- 3.16 A suggestion was made that an environmental charge could be levied on passengers to offset environmental impacts.
- 3.17 NATS En-route Ltd ("NERL") operates under licence from the CAA. Introducing environmental levies is beyond the NATS remit for en-route services. Issues such as this should be directed to the CAA who determine UK airspace policy. This suggestion will be passed to the CAA along with the other responses to the consultation.

### **Sub proposal 3: Limiting potential growth on the proposed routes**

- 3.18 A suggestion was made that growth of traffic on the proposed routes should be limited.
- 3.19 NERL operates under licence from the CAA. This includes a requirement to service reasonable levels of air traffic demand; the determination of what is reasonable is a matter for the CAA. The suggestion to introduce limits to route usage will be passed to

the CAA along with the other responses to the consultation.

## **Sub Proposal 3: Noise monitoring**

- 3.20 A suggestion was made that NATS should undertake noise monitoring at environmentally sensitive sites to ensure the effects are as presented in the consultation document.
- 3.21 The  $L_{max}$  noise information presented in the consultation document is generated by the CAA Environmental Consultation and Research Department. NATS does not consider that this indicative noise information requires verification by local noise monitoring.
- 3.22 Should the proposal be accepted NATS will undertake a post implementation analysis on the first 12 months of use, as required by CAA guidance set out in CAP725. This will include measurement of the number of aircraft using the proposed airspace, for comparison with the numbers presented in the consultation document. This will enable assessment of whether the impacts are as proposed.

## **Sub Proposal 4: Impacts on nature reserves and other designated sites**

- 3.23 The potential effect on nature reserves and other designated sites was questioned. This includes Sites of Special Scientific Interest (SSSIs), Special Areas of Conservation (SACs), Special Protection Areas (SPAs), Ramsar sites, National Nature Reserves (NNRs) and Local Nature Reserves (LNRs).
- 3.24 The CAA guidance for airspace change states that "it is considered unlikely that airspace changes will have a direct impact on animals, livestock and biodiversity". The guidance also indicates that local air quality is not relevant to changing aircraft tracks above 3000ft.
- 3.25 SSSIs and other associated designations are applied to protect wildlife and geologically interesting sites, rather than designation for recreational enjoyment in the same way as AONBs and National Parks. National and Local nature reserves are generally open to the public, and NATS recognises that tranquillity may be an issue to these areas. However, NATS considers that the impact from this change will be relatively low because of the height of the proposed change over Lancashire, and the relatively low frequency of additional overflights. NATS therefore contends that the overall balance is in favour of the benefits presented in terms of flight and CO<sub>2</sub> efficiency.

## **Sub Proposal 4: Noise monitoring and capping traffic growth**

- 3.26 These issues are discussed under sub proposal 3. This discussion is equally relevant to the same issues raised under sub proposal 4.

## **Sub proposal 5: Visual, Noise and Tranquillity Impacts**

- 3.27 The effect and issues relating to Sub proposal 5 and its potential impact on the Clwydian Range AONB are the same as discussed in paragraphs 3.3 and 3.4.

## **4. What happens next?**

- 4.1 This report is published on the NATS airspace consultations website [www.consultation.nats.co.uk](http://www.consultation.nats.co.uk).
- 4.2 The consultation document, combined with the superseding comments and conclusions from this report, will form the basis of an Airspace Change Proposal (ACP).
- 4.3 NATS intends to submit this ACP in October 2011 for consideration by the CAA's

Director of Airspace Policy, with a view to a two phase implementation from May 2012, should the proposal be approved by the CAA.

4.4 The implementation phases are planned as follows:

**Phase 1:** May 2012 implementation for all elements not solely associated with Dublin Point Merge (sub proposal 2, 4 and 5, plus sub proposal 3 - UY124 only (not L124 and associated CAS)

**Phase 2:** November 2012 implementation for all elements solely associated with Dublin Point Merge (sub proposal 1 plus sub proposal 3 - L124 and associated CAS)

4.5 Should any part of the proposal not achieve CAA approval, NATS will seek to implement those remaining parts that do achieve approval. Should any element of the proposal fail to achieve approval, NATS may continue development with a view to achieving approval at a later date, following the CAP725 guidance for any subsequent ACP submission, and including reconsultation if the impacts of the proposal differ significantly from those already presented in this consultation exercise.

## References

1. **GUIDANCE TO THE CIVIL AVIATION AUTHORITY ON ENVIRONMENTAL OBJECTIVES RELATING TO THE EXERCISE OF ITS AIR NAVIGATION FUNCTIONS**, January 2002, Department for Transport  
(<http://www.dft.gov.uk/pgr/aviation/environmentalissues/ancetothecivilaviationau2879.pdf> )
2. **CAP 725, CAA GUIDANCE ON THE APPLICATION OF THE AIRSPACE CHANGE PROCESS**, March 2007, Civil Aviation Authority Directorate of Airspace Policy  
(<http://www.caa.co.uk/docs/33/CAP725.PDF> )