

**Proposal for Harmonisation of South East England
Transition Altitude & Re-designation of Daventry Class C
Airspace (Known as "SE England TA")**

**STAKEHOLDER CONSULTATION
FEEDBACK REPORT**

**Issue 1
30 August 2011**

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1. Executive Summary - South East England Transition Altitude Harmonisation & Re-designation of Daventry Class C Airspace ("SE Eng TA").

NATS conducted a 12-week consultation (from 8th April 2011 to 1st July 2011) regarding the above proposal, the intended date of implementation of which is 8th March 2012.

Members of the National Air Traffic Management Advisory Committee (NATMAC) were invited to give feedback on this proposal, along with a number of local aerodromes¹. These made up the primary stakeholders for this proposal.

This proposal seeks to harmonise the Transition Altitude (TA) in the proposed area, to 6,000ft in order to match that in all other UK Controlled Airspace (CAS) with the exception of the Manchester TMA and associated airspace. It also proposes, in order to enable this TA harmonisation, to redefine the boundary of the London Terminal Manoeuvring Area (LTMA) to include adjacent airways sections and integrate sections of the current Worthing and Clacton CTAs.

NATS will not introduce any new Controlled Airspace as a result of this harmonisation and re-designation.

These proposals also apply to airfields situated beneath the re-designated airspace i.e. their TA will change to reflect the airspace above and therefore set to 6,000ft. This will simplify their airfield operations and within adjacent airspace beneath the CTAs.

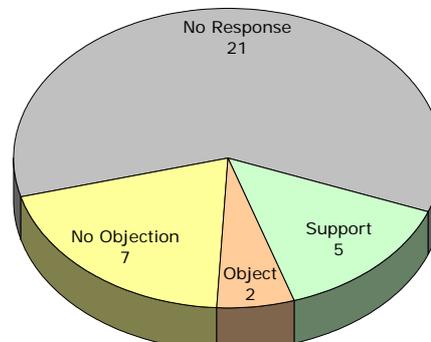
Under the Release of Controlled and Segregated Airspace (RCSA) policy, a separate proposal to release 1,000ft of CAS from part of the LTMA south of Gatwick Airport was recently sent to the CAA's Directorate of Airspace Policy (DAP). This will raise the base of CAS to 4,500ft and will necessitate a slight redefinition of CAS in this area, improving GA access. Maps herein will assume this has occurred, however that RCSA process is ongoing at time of writing.

If accepted, this Transition Altitude airspace change will enhance safety, by simplifying airspace structures and boundaries, and ensuring that within and beneath the designated airspace, all aircraft are using the same altimeter setting. This removes possible operational confusion in the area due to differences in TA, and reduces the risk of infringement into CAS due to use of an incorrect altimeter setting.

A further advantage is to simplify operations below CAS in the South East of England which will be published as part of briefing material and new VFR route maps prior to the Olympic games in 2012.

CAA guidance is that this proposed change does not require consultation with environmental stakeholders since it is limited to a change in the technical make-up of the airspace.

Of the original 35 Primary Stakeholders, 14 responded. Of these responses, 5 supported the proposal and 7 did not object or had no comment. There were 2 objections.



There were two responses from members of the public (one GA pilot, one commercial pilot), both supporting the change on safety and simplification grounds.

¹ See Appendix A of the consultation document for a list of those formally consulted.

In the event that a representative organisation wishes to present **new** evidence or data to the Director of Airspace Policy, for consideration prior to making his regulatory decision regarding this proposal, the representative organisation must submit, in writing, the information to the following address:

The Director (SE England TA ACP)
Directorate of Airspace Policy
CAA House
45-59 Kingsway
London
WC2B 6TE

2. Introduction

This document provides feedback to all stakeholders who participated in the consultation undertaken by NATS for the SE England TA proposal.

Guidance was received from the Civil Aviation Authority's Directorate of Airspace Policy (DAP) that due to the nature of the proposed change consultation with environmental stakeholders was not required.

NATS conducted a 12-week consultation (from 8th April 2011 to 1st July 2011) regarding this proposal, the intended date of implementation of which is 8th March 2012.

This document should be read in conjunction with the stakeholder consultation document - all acronyms and technical terms are explained therein. For reference, the stakeholder consultation document is available from www.consultation.nats.co.uk

The consultation was distributed to a total of 26 stakeholders on the National Air Traffic Management Advisory Committee (NATMAC) and 9 local aerodromes. The Ministry of Defence (MoD) was engaged prior to and during the consultation, as part of NATMAC, via the Defence Airspace and Air Traffic Management (DAATM) contacts.

3. Analysis of Responses

The consultation process was conducted via email. A postal response service was available, but no such paper feedback was received.

3.1 Primary Stakeholders

Of the original 35 primary stakeholders, 14 responded. Of these responses, 5 supported the proposal and 7 did not object or had no comment. There were 2 objections. The total number of Primary Stakeholders that did not respond was 21.

Figure 1 summarises these responses:

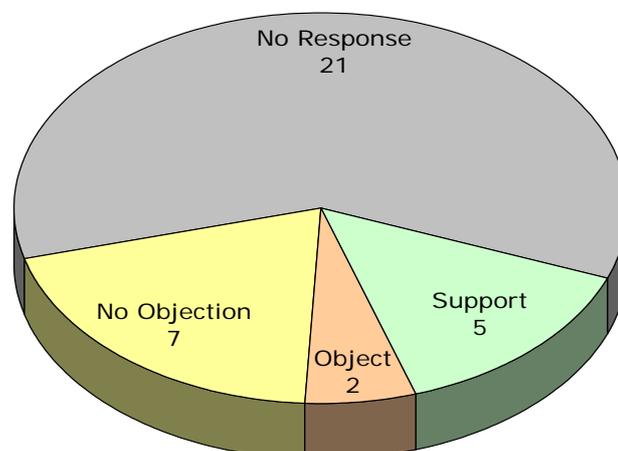


Figure 1 Primary Stakeholder Overview

The main themes identified from these responses are shown in Figure 2 below:

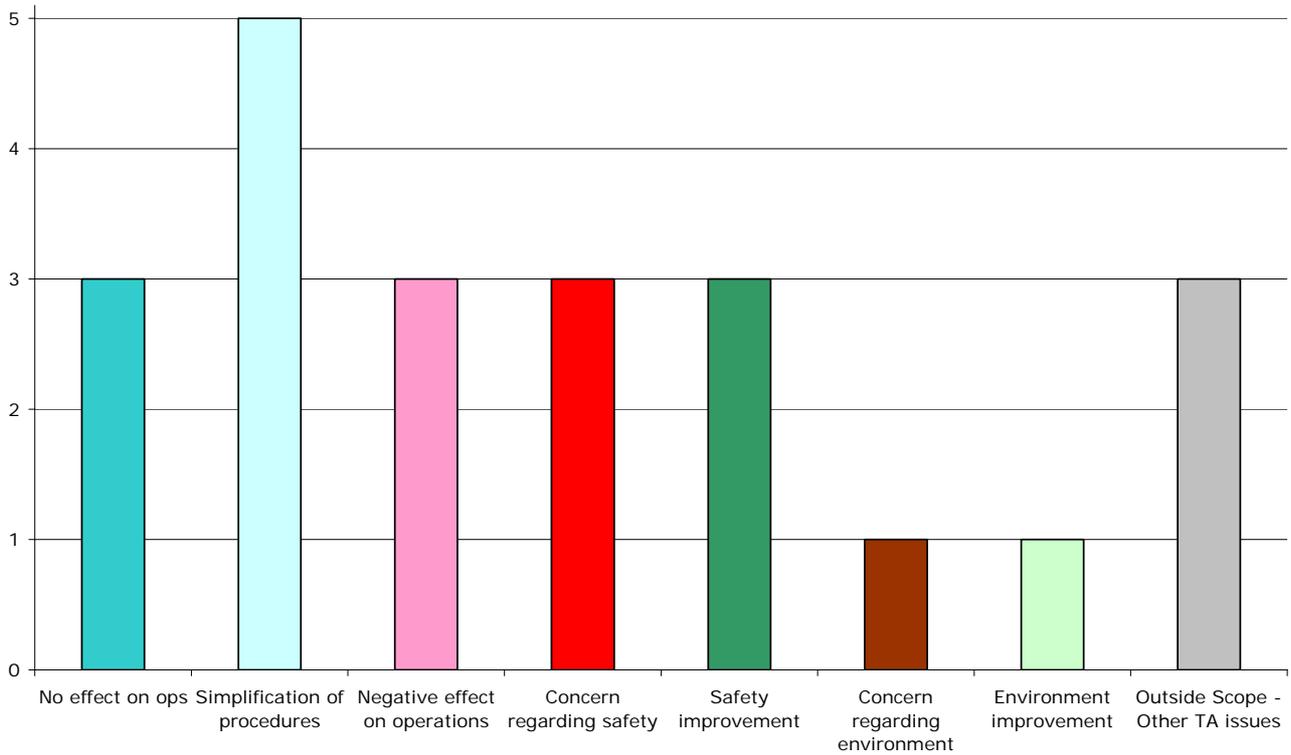


Figure 2 Primary Stakeholder Themes

The themes are discussed in the following paragraphs, and are numbered as below:

- 1. No (or minimal) effect on operations**
- 2. Simplification of procedures**
- 3. Negative effect on operations**
- 4. Concern regarding safety**
- 5. Positive effect on safety**
- 6. Concern regarding environment**
- 7. Positive effect on environment**
- 8. Outside scope (other issues)**

3.1.1 Themes regarding operational effects:

Theme 1: No (or minimal) effect on operations

Some stakeholders registered no objection on the grounds that the proposed change would not have any effect on their operations.

Theme 2: Simplification of procedures

Many stakeholders registered no objection or supported the proposed change on the grounds that it would have a beneficial effect on their operations. For instance simplification of procedures with a consistent transition altitude across the region. Hence pilots do not have to think about “what is the transition altitude here?” in each airspace region.

Theme 3: Negative effect on operations

Some stakeholders registered objections on the grounds that the proposed change would have a negative effect on their operations.

The BGA, BHPA & LAA expressed concern regarding “headroom reduction during periods of high pressure”. The issue is that at present since the base of controlled airspace (CAS) is defined as a flight level, the effective ceiling of uncontrolled airspace (UCAS) rises & falls depending on variations in atmospheric pressure. In high pressure conditions this can result in the ceiling of uncontrolled airspace being significantly higher. This can give glider pilots more “headroom” i.e. they can climb slightly higher which gives more gliding range. By changing the definition of the controlled airspace base to an altitude, the height of the boundary between controlled & uncontrolled airspace becomes fixed, it no longer varies with atmospheric pressure. Hence the request from the BGA, BHPA & LAA is that the base of CAS should not be changed to the corresponding altitude (i.e. FL55 becomes 5500ft) but it should be raised e.g. FL55 becomes 6000ft.

It is important that the TA harmonisation proposed herein is viewed in the context of the bigger strategic picture. The change proposed by this ACP is limited to harmonising the Transition Altitude at 6000ft. The next step proposed is to raise the transition altitude nationally to a higher level² (e.g. 18000ft). This would enable a redesign of all Standard Instrument Departures (SIDs) such that they could be (where possible) given unrestricted climbs. This has significant environmental benefits in terms of reduced CO₂ emissions and fuel burn. This should also result in the aircraft being higher sooner, and hence will enable a review of all the airspace bases. Such a review is planned as part of the London Airspace Management Programme (LAMP).

Hence although in the short term the issue of reduced headroom is valid, this change will in the long term enable the base of CAS in some areas to be raised. This will benefit all users of uncontrolled airspace.

The LAA expressed a desire for the TA to be harmonised at 6000ft throughout the UK FIR. NATS is not able to change the TA outside controlled airspace, this is the responsibility of the CAA DAP. NATS supports a unified TA across the whole FIR, and to this end is working with the CAA DAP to harmonise the TA nationally, albeit to a higher level (e.g. 18000ft). This change is planned to be implemented in winter 2013, there is no interim plan to unify the TA nationally at 6000ft in controlled and uncontrolled airspace before this. Thus this issue, although related, is outside the scope of this consultation.

² Planned for winter 2013/Spring 2014

The LAA also cited that this change results in an increase in the length of boundary between the areas of 3000ft TA and 6000ft TA. It is at this interface that there is the opportunity for error, by operating with the wrong altimeter setting in either region. While it is true that the length of the boundary will be increased, it is intended that this will only be temporary until 2013/2014 at which point the TA will be unified in both controlled and uncontrolled airspace.

3.1.2 Themes regarding safety:

Theme 4: Concern regarding safety

BGA expressed concern that the reduction in headroom (as discussed in Theme 3), would result in increased occurrence of gliders landing out.

Glider pilots should still apply the same airmanship and safety principals, which dictate how far from airfields they are prepared to venture at a given altitude. If due to the TA change the altitude available is slightly less, then just as if using a weak thermal, the distance from an airfield should be correspondingly reduced. It is the pilot's choice whether to stay within range of an airfield or whether to venture cross-country away from airfields.

The BGA suggested that gliders and GA light aircraft benefit from "natural de-confliction" stating that "Gliders are seldom below 2500' when flying across country and many PPL-type flights are at 2500' or lower. When airspace is lowered by even a few hundred feet, it upsets this natural order and directly increases the collision risk. "

NATS radar recordings indicate that GA aircraft make full use of all altitudes within the available uncontrolled airspace, following the principal that additional height gives additional safety. It would be dangerous to assume that powered light aircraft do not operate in the higher altitudes of uncontrolled airspace, and a vigilant lookout by all pilots is strongly recommended at all levels in order to minimise any risk of collision.

Both of the above safety concerns are primarily related to the "headroom reduction" negative effect on operations as discussed in Theme 3. It should be re-iterated that the reduction in headroom would be a short term effect, enabling an increase in the ceiling of UCAS/headroom in the longer term.

Theme 5: Positive effect on safety

The harmonisation of the transition altitude will lead to less risk of error in altimeter setting procedures. With the current arrangements there is a risk of pilots using 1013mb altimeter setting when they should be on QNH and vice versa, especially if operating between 3000ft/FL30 and 6000ft/FL60. Using the wrong setting can increase the risk of vertical infringement of airspace, and could also increase the risk of collision in UCAS. By harmonising the TA the risk of using the wrong setting is reduced. This should also result in a reduced number of vertical infringements.

3.1.3 Themes regarding environment:

Theme 6: Concern regarding environment

The BGA stated that the change in TA would change the altitude being climbed to on SIDs, quoting the London Heathrow Compton departures as an example. All SIDs climb to an altitude not a flight level, and usually this is the transition altitude (this being the highest altitude available). The Compton SIDs climb to 6000ft (altitude) at DME8 before CPT. The transition altitude in this area is currently 6000ft hence there will be no change to this procedure. Hence aircraft trajectories will not alter as a result of the proposed change.

Changes to SIDs as a result of the TA harmonisation will be limited to the Transition Altitude notification box being updated to reflect the new 6000ft TA, in those areas where it is currently 4000ft.

Theme 7: Positive effect on environment

This change should not have any change on environmental factors. However as discussed in Theme 3 it is a first step in a series of changes which will enable future airspace changes to implement unrestricted climbs and which will review all bases of CAS.

The future aspiration of raising the TA to 18000ft will yield environmental benefits by allowing continuous climb departures with no level-off at a low level transition altitude required. The corollary of this will be the ability to raise the base of CAS in many areas, thus releasing airspace to Class G.

3.1.4 Outside the scope of this specific consultation:

Theme 8: Outside scope (other issues)

Several stakeholders commented on the aspiration of raising the TA to a higher level.

Southend Airport wrote that the TA should eventually be much higher than 6,000ft in the south east, and that the Regional Pressure Setting system should be abolished.

The LAA wrote that their preferred version of this TA change would be to harmonise the entire UK FIR at 6,000ft, implemented in one single event.

These points, whilst relevant to TA in general and informative for future TA plans, fall outside the scope of this specific consultation.

3.2 Other Responses (non-Primary Stakeholders)

There were 2 additional responses that came from members of the public, both of whom were pilots. Both their responses supported the proposal, on the grounds of simplifying procedures and having a positive effect on safety.

4. Summary of Intended Airspace Change Proposal

The issues raised through consultation feedback have been given careful consideration as far as practical, balancing all stakeholder needs. This consideration has been detailed within the main body of this report.

Following this consideration, NATS will be proceeding with the airspace design described in the original Consultation to the CAA for consideration.

4.1 What happens next?

This report is published on the SE England TA sub-page of the NATS airspace consultations website www.consultation.nats.co.uk

The consultation document, combined with the findings of this report, will form the basis for an Airspace Change Proposal (ACP).

This will be drafted by NATS and submitted to the CAA's Directorate of Airspace Policy (DAP), likely to be late August 2011.

Appendix A: Midlands - Final proposed configuration

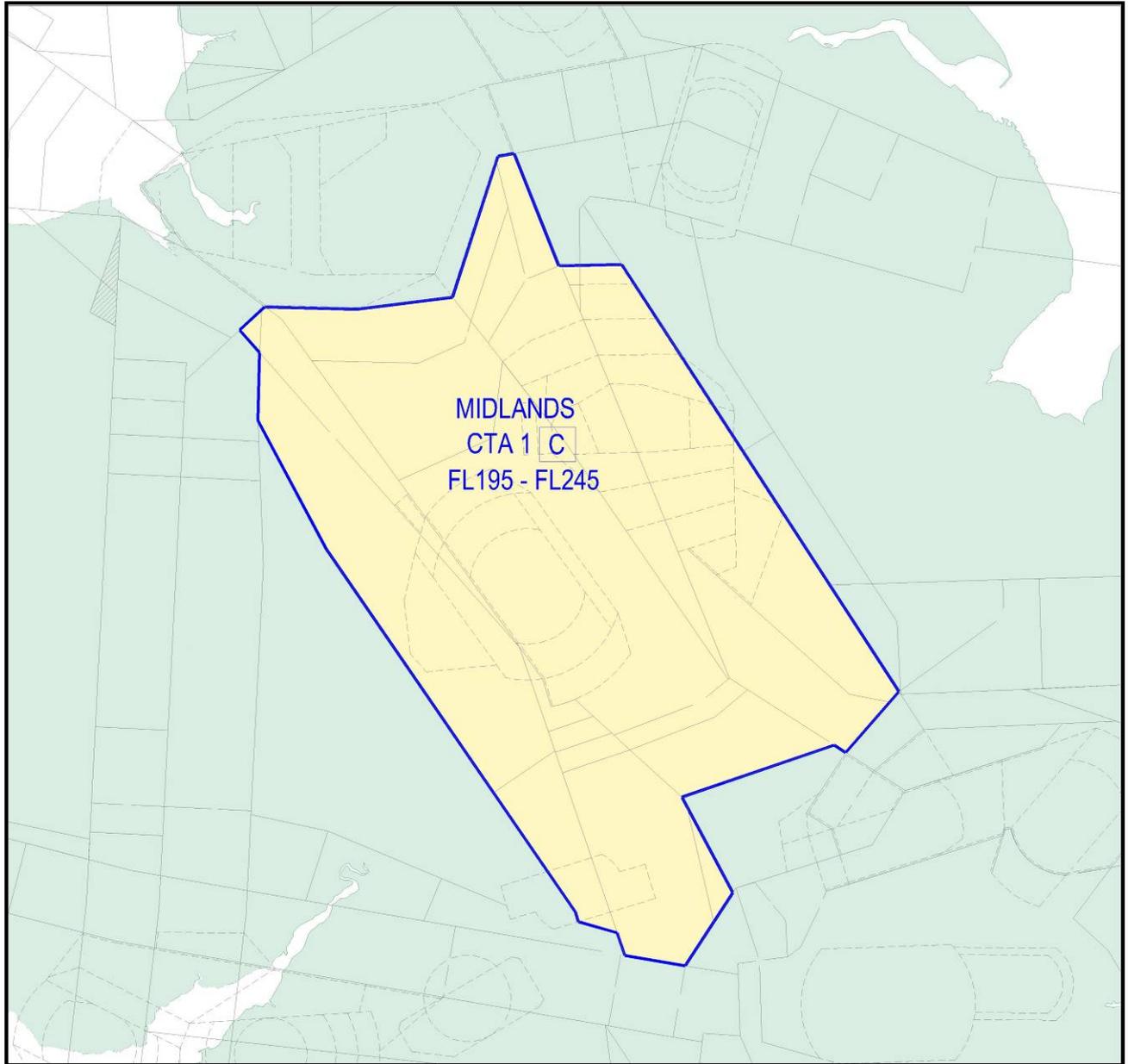
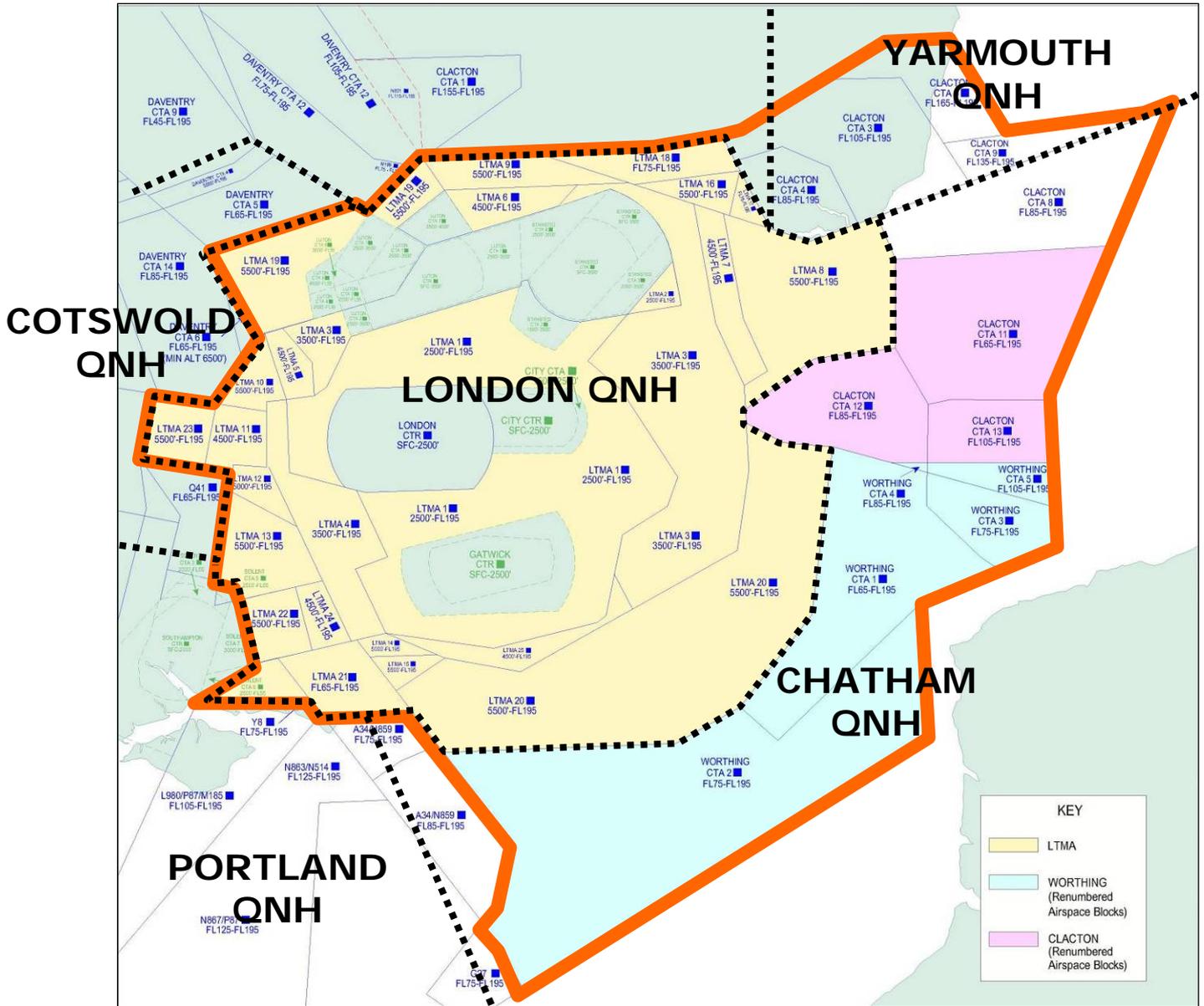


Figure 3 UK Midlands proposed configuration FL195 – FL245 © NATS 2011

Taken from Consultation Document Figure 6.

Appendix B: Proposed redefinition of the SE area

In the chart below, the orange area is where it is proposed that the applicable TA will be 6,000ft amsl. The appropriate altimeter setting regions are depicted on the chart below.



VFR chart © CAA/NATS 2011, contains OS data Crown © 2011 License no. 100049107, overlaid airspace data © NATS 2011

Figure 4 SE proposed configuration