



Consultation Feedback Report

Severn Airspace Change Proposal

Issue 1

| Action | Role | Name | Signature | Date |
|--------|---------------------------|-------------|--------------|----------------------------|
| Author | Airspace Change Assurance | Brad Taylor | Not required | 25 th July 2012 |

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1 Introduction

From 24th May 2012 to 20th July 2012, NATS conducted a consultation soliciting feedback on proposals to introduce two volumes of airspace above the current Bristol Airport (EGGD) CTA, one of which lies within the airway N90. After release of the first consultation letter (via email) on the 24th May, an error was noted in the picture which described the airspace. Therefore a second letter with an updated diagram was issued the following day, the 25th May.

This airspace is required in order to enhance the Continuous Climbs Departures (CCDs) from Bristol airport and to afford the protection of Controlled Airspace to those operators which currently conduct CCDs through Class G airspace, above the Bristol CTA.

NATS is planning to implement this change by 13th December 2012.

2 Consultation Documentation

2.1 Introduction on NATS Consultation Internet Page

The following paragraphs were used to introduce the consultation.

Severn Region: Proposal for Additional Controlled Airspace (Bristol and Cardiff area)

The Control Area (CTA) for Bristol Lulsgate Airport (EGGD) has a ceiling of FL105. To the north and west of the airport, this adjoins Class A airspace. However, to the south, the airspace above the CTA is Class G up to the Class C airway base at FL195.

This means that aircraft departing from the easterly runway to the south either level off at FL100 (incurring a fuel and CO2 cost), or climb into uncontrolled airspace above, before re-entering controlled airspace associated with the airways system.

NATS is proposing to provide a continuous controlled airspace environment for Bristol Lulsgate departures, by establishing a section of CAS above the Bristol CTA. This would ensure environmental efficiency can be achieved whilst providing aircraft with the enhanced separation assurance offered by controlled airspace.

The consultation starts on 24th May and ends 20th July. Please use the link below to download the consultation document which contains instructions on how to respond.

[A link to the document was provided here]

2.2 Consultation Letter

The following consultation letter was available to download from the NATS site, to describe the nature of the airspace change proposal and to set out the manner in which to respond.

Severn Region: Proposal for Additional Controlled Airspace (Bristol and Cardiff area).

Dear Colleague,

[Please note that it has been necessary to implement a change to the proposal since its issue yesterday morning (24th May 2012). An additional piece of airspace has been

appended to the initially proposed Extension 1 (see Figure 1 below). This new area of airspace (Extension 2) will enable the stated goals of improved Continuous Climb Departures, to continue outside of the stated hours of operation of the weekend only airways, N862 and N90.

All parties who were informed of this proposal and invited to respond, have been contacted with these latest developments. For a more comprehensive explanation please see details below.]

NATS has an ongoing programme of airspace changes that seek to improve the efficiency of the ATM system. This programme seeks to enhance safety and improve environmental performance.

Overview of the proposal

The CTA for Bristol Lulsgate Airport (EGGD) has a ceiling of FL105. To the north of the airport this adjoins the Class A airspace associated with Y3 and the Cotswold CTA. However, to the South the airspace above this is uncontrolled Class G up to the Class C base at FL195.

This means that aircraft departing from the easterly runway to the south, either level off at FL100, incurring a fuel and CO₂ cost, or they can climb into the uncontrolled airspace above, before re-entering controlled airspace associated with N864 and N862 ATS routes.

NATS is therefore proposing to provide a continuous controlled airspace environment for southbound Bristol Lulsgate departures, by establishing two sections of CAS, shown in Figure 1 overleaf in red and pink, and described in more detail below. This would ensure environmental efficiency can be achieved whilst providing aircraft with the enhanced separation assurance offered by controlled airspace.

As this section of N862 (to BHD) and N90 is only available 1600 Fri to 0800 Mon in the winter (1 hour earlier in summer), extension 2 will be active outside of these times, to ensure that the stated aims of this proposal are permanently achievable.

Impact on other airspace users

This proposal is based on the principle that it is unlikely to have a negative impact on the users of the uncontrolled airspace, because:

- The airspace is vertically sandwiched between the CTA at FL105 and Class C at FL195, and laterally it is a cul-de-sac as it has Class A controlled airspace to the north and west.
- The known users of the airspace are the MOD, with whom NATS has coordinated to ensure that their access would not be compromised
- We have undertaken an analysis of 4 months of radar data from 2011/12 (2 months from summer and 2 months from the winter) which has indicated that there were zero instances of 7000/7001 codes in the airspace during that time.
- We have contacted the BGA directly, who have offered no objection.
- The ATSU at Cardiff, who provide the approach and radar function for the adjacent CTA airspace, are providing assurance that clearances to enter would be given under all normal circumstances.

Detailed description of proposed Airspace

Figure 1 below illustrates the lateral extent of the proposed change as follows:

- From an intersection on the southern boundary of the Bristol CTA which is perpendicular to a point 5nm East of Bristol Lulsgate Airport (EGGD), follow the CTA westwards to a point coincident with the eastern edge of airway N862. This additional volume of CAS would sit on top of extant CAS and would be classified as Class D from FL105 to FL165, and Class C from above FL165 to FL195. (Ext 1 on Figure 1).

- This Ext 1 change is proposed as H24.
- A second area of airspace will operate from the eastern edge of airway N90, following the Bristol CTA boundary, to the eastern edge of N864, thence north to the southern boundary of airway Y3. This is illustrated as Ext 2 in Figure 1 and will be operational outside of the hours of operation of the background airways. These background airways (N862 and N90) are operational 1600 Fri to 0800 Mon, winter (1 hour earlier summer) as Class A airspace.
- This additional volume of CAS would be classified as Class D from FL105 to FL165, and Class C from above FL165 to FL195. (Ext 2 on Figure 1).
- The airspace above FL165 up to FL195 (within the lateral extent of the shaded areas below) will be Class C – to remove the potential of having a 3000ft fillet of Class G airspace, and to enable continuous climb above FL165.
- In summary:
 - Additional Class D airspace – FL105 to FL165
 - Additional Class C Airspace – FL165 to FL195
 - Both additions are within the lateral extent of existing Controlled Airspace (represented by Ext 1 (red) and Ext 2 (pink) areas below)

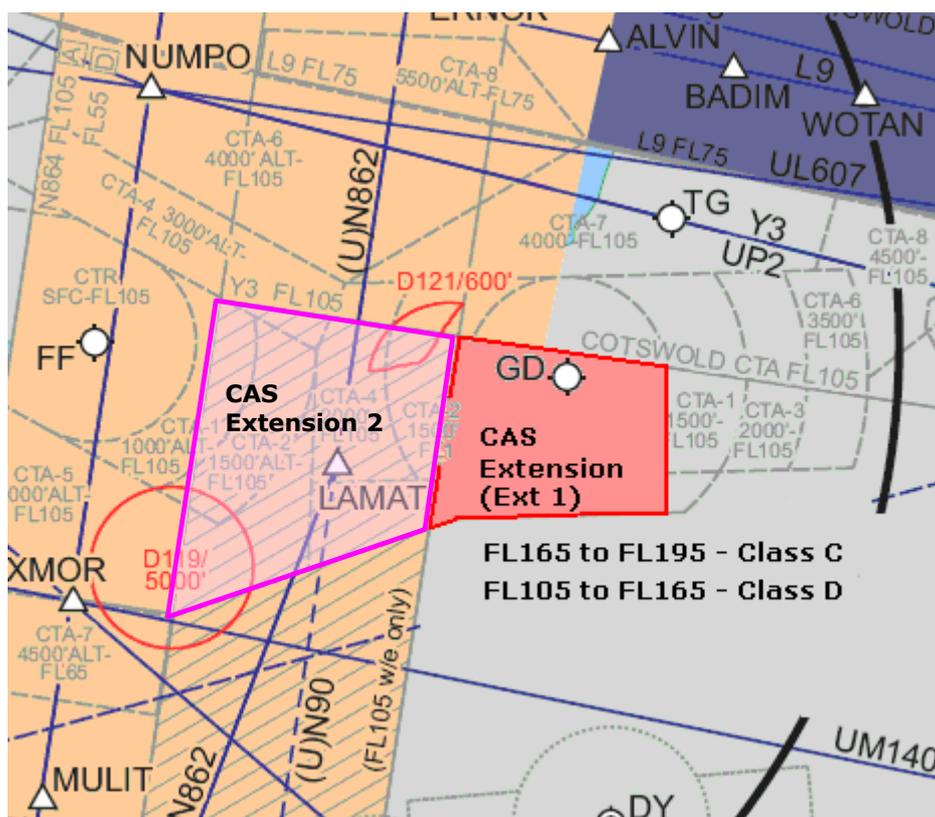


Figure 1: Severn Control Area - Additional CAS

Consultation process

The consultation is to run from 24th May 2012 to 20th July 2012. This is to enable NATS to achieve an implementation date of December 2012, in order to realise the benefits associated with this change as quickly as possible. Failing this, the next 'slot' for implementing this change will be a further 6 months hence.

The CAA have agreed to this period of consultation on the basis that the MOD and the BGA have been consulted prior and that our radar analysis indicates that there are no other users of the airspace, who are not already speaking to a radar unit (i.e. those transiting into controlled airspace). In this instance the only noticeable change for these users will be a transfer of service provider.

We request that you consider the above proposal and reply to indicate whether your organisation supports, objects to, or has no objection to the proposal.

In the case of either **Support** or **Objection**, please provide your basis for that view, so that your opinions can be considered in the on going development of this proposal.

Please provide your email response to: AirspaceConsultation@NATS.co.uk

Kind Regards

NATS Airspace Consultation Team

When responding please use the text below:

Severn Control Area Consultation Response:

I am responding on behalf of [organisation] and we:

- **DO NOT OBJECT TO**
- **SUPPORT [Please state reasons for your support]**
- **OBJECT TO [Please state reasons for your objection]**
(delete as applicable)

The Severn Control Area CAS proposal, as detailed above.

3 Overview of responses

3.1 Response Rate

The initial email distribution of the stakeholder consultation document was sent to organisations and individuals represented by the National Air Traffic Management Advisory Committee (NATMAC) and Aer Arann, an operator identified as potentially being affected by the proposed change.

33 stakeholders were involved in the consultation; of these 16 responded. The number of responses are summarised in the pie chart at Figure 2.

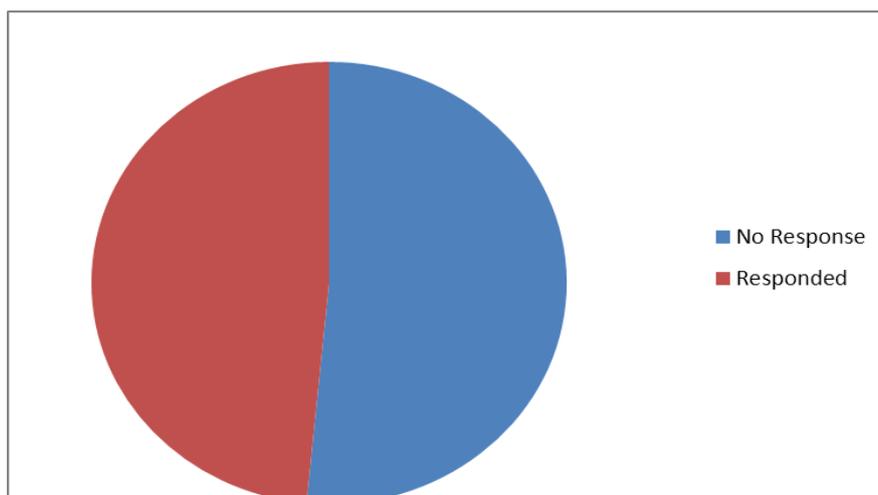


Figure 2: Total Responses to the Consultation

The consultation requested feedback on only one possible option for the airspace change; that was to implement the change as described in Figure 1, or not.

The responses (support /no objection /object) to the change are summarised in Figure 3, below. This shows that there were no objections to the proposal and that the majority of the responders had either 'no objection' to make or supported the change.

Two responders could not comment on behalf of their organisation; however one stated that they had passed the details to their members for individual comment.

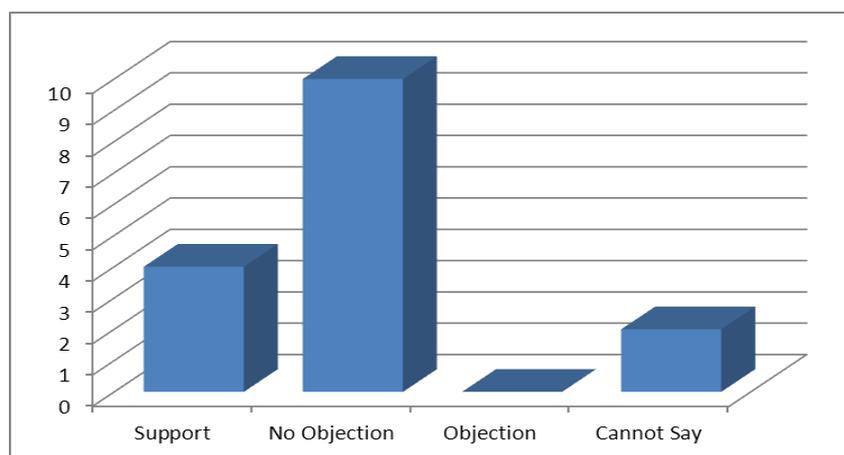


Figure 3: Breakdown of Responses to the Consultation

3.2 Conclusion of Responses & Comments

All of the comments were either neutral or supported the change and there were no objections raised, therefore NATS intends to submit an ACP based upon the information presented within the consultation document without change.

4 Further Correspondence and feedback

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 (Severn Area ACP)
Directorate of Airspace Policy
CAA House
45-59 Kingsway
London WC2B 6TE

Appendix

Response Matrix

| Unique ID | Organisation Name | OBJ/NC/SUPT | NATS Response (1, 2, 3...) |
|-----------|---------------------------------|----------------|---------------------------------------------------|
| NATMAC01 | Airport Operators Association | | Reminder email sent 10th July 2012 |
| NATMAC02 | AOA | | Reminder email sent 10th July 2012 |
| NATMAC03 | AOPAUK | | Reminder email sent 10th July 2012 |
| NATMAC04 | Aviation Environment Federation | Cannot Respond | Sent to their members for local response |
| NATMAC05 | BA | Support | |
| NATMAC06 | BAA | No Objection | Response came from a different BAA representative |
| NATMAC07 | BAE Systems | | Reminder email sent 10th July 2012 |
| NATMAC08 | BALPA | Support | |
| NATMAC09 | BATA | | Reminder email sent 10th July 2012 |
| NATMAC10 | BBAC | No Objection | |
| NATMAC11 | BBGA | | Reminder email sent 10th July 2012 |
| NATMAC11 | BBGA | | Reminder email sent 10th July 2012 |
| NATMAC13 | BGA | | Reminder email sent 10th July 2012 |
| NATMAC13 | BGA | No Objection | Response came from a different BGA representative |
| NATMAC16 | GATCO | | Reminder email sent 10th July 2012 |
| NATMAC17 | BHPA | No Objection | |
| NATMAC18 | BMAA | | Reminder email sent 10th July 2012 |
| NATMAC19 | BMFA | No Objection | |
| NATMAC20 | BPA | | Reminder email sent 10th July 2012 |
| NATMAC21 | British Helicopter Association | No Objection | |
| NATMAC22 | Low Fares Airlines | No Objection | |
| NATMAC23 | European UAV Systems Centre | | Reminder email sent 10th July 2012 |

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|----------|----------------|----------------|----------------------------------------------------------|
| NATMAC24 | GAPAN | No Objection | |
| NATMAC27 | GASCo | | Reminder email sent 10th July 2012 |
| NATMAC28 | HCGB | | Reminder email sent 10th July 2012 |
| NATMAC29 | Heavy Airlines | | Reminder email sent 10th July 2012 |
| NATMAC30 | LAA | Support | |
| NATMAC31 | Light Airlines | Support | |
| NATMAC32 | PPL/IR | | Reminder email sent 10th July 2012 |
| NATMAC33 | UKAB | Cannot Respond | His organisation does not respond |
| ORGAVN01 | Aer Arann | No Objection | |
| MOP 001 | Private Pilot | No Objection | Not formally on the recipients list, has replied from GA |