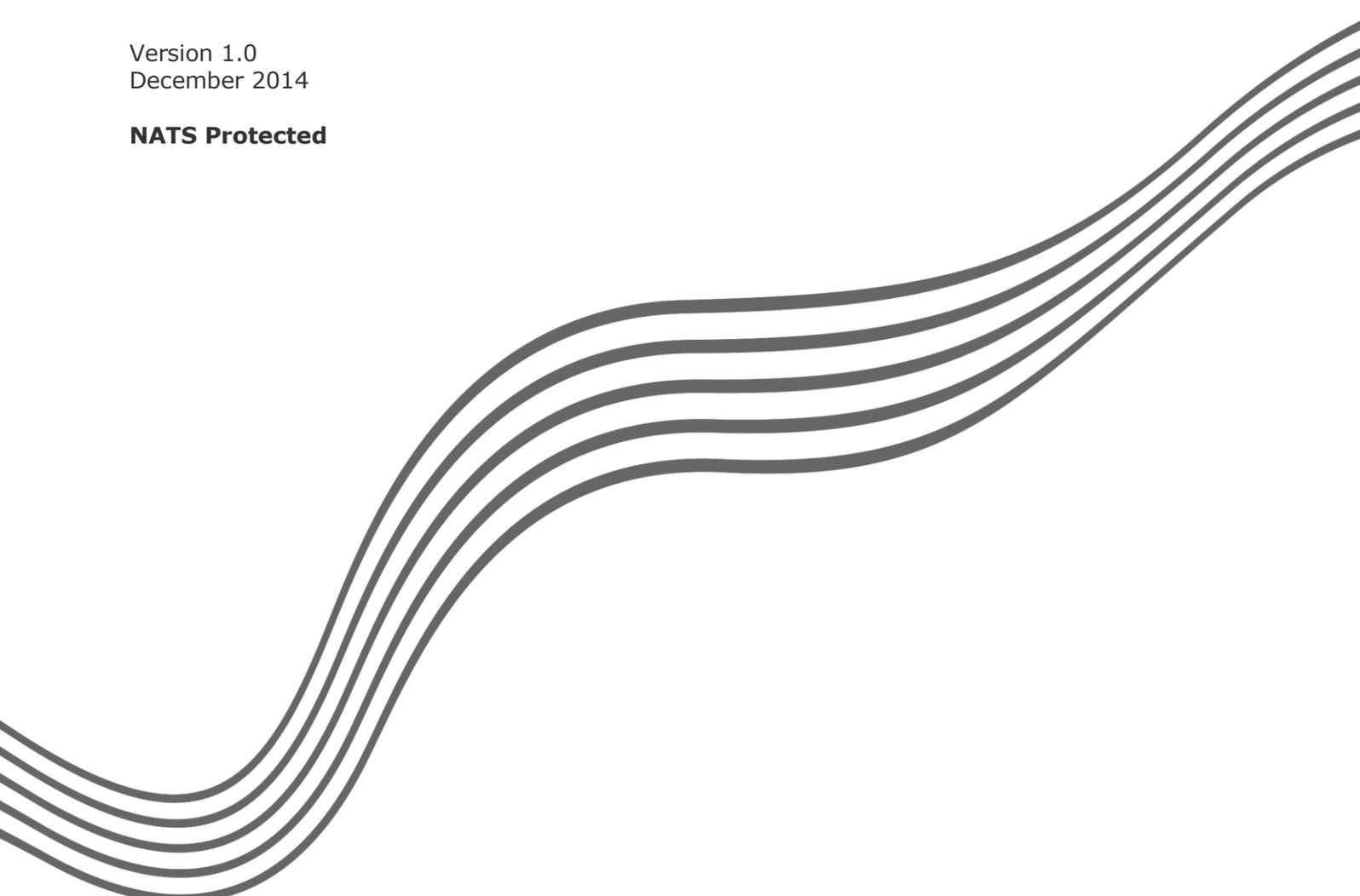


Ekofisk & Balder: North Sea, Class D CTAs

Consultation Feedback Report

Version 1.0
December 2014

NATS Protected



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Table of contents

1	Introduction	4
2	Confidentiality	7
3	Consultation Engagement	8
3.1	Statistics	8
3.2	Consultee Responses	11
4	Summary of Intended Airspace Change Proposal	12
5	Feedback to Consultees	13
5.1	Post Implementation Review	13
5.2	Further Correspondence & Feedback	13
6	Consultation Emails & Web Text	14
6.1	Email Sent to Consultees	14
6.2	NATS Web Landing Page	14
6.3	Consultation Letter (PDF)	15
	Appendices	16
	Ministry of Defence Response	16

1 Introduction

Between 25th July 2014 and 19th September 2014 (a period of 8 weeks), NATS conducted a consultation on behalf of the Norwegian ANSP Avinor seeking feedback from stakeholders on a proposal to implement two Class D CTAs within in the North Sea, in the vicinity of the Balder and Ekofisk platforms. See Figure 1.

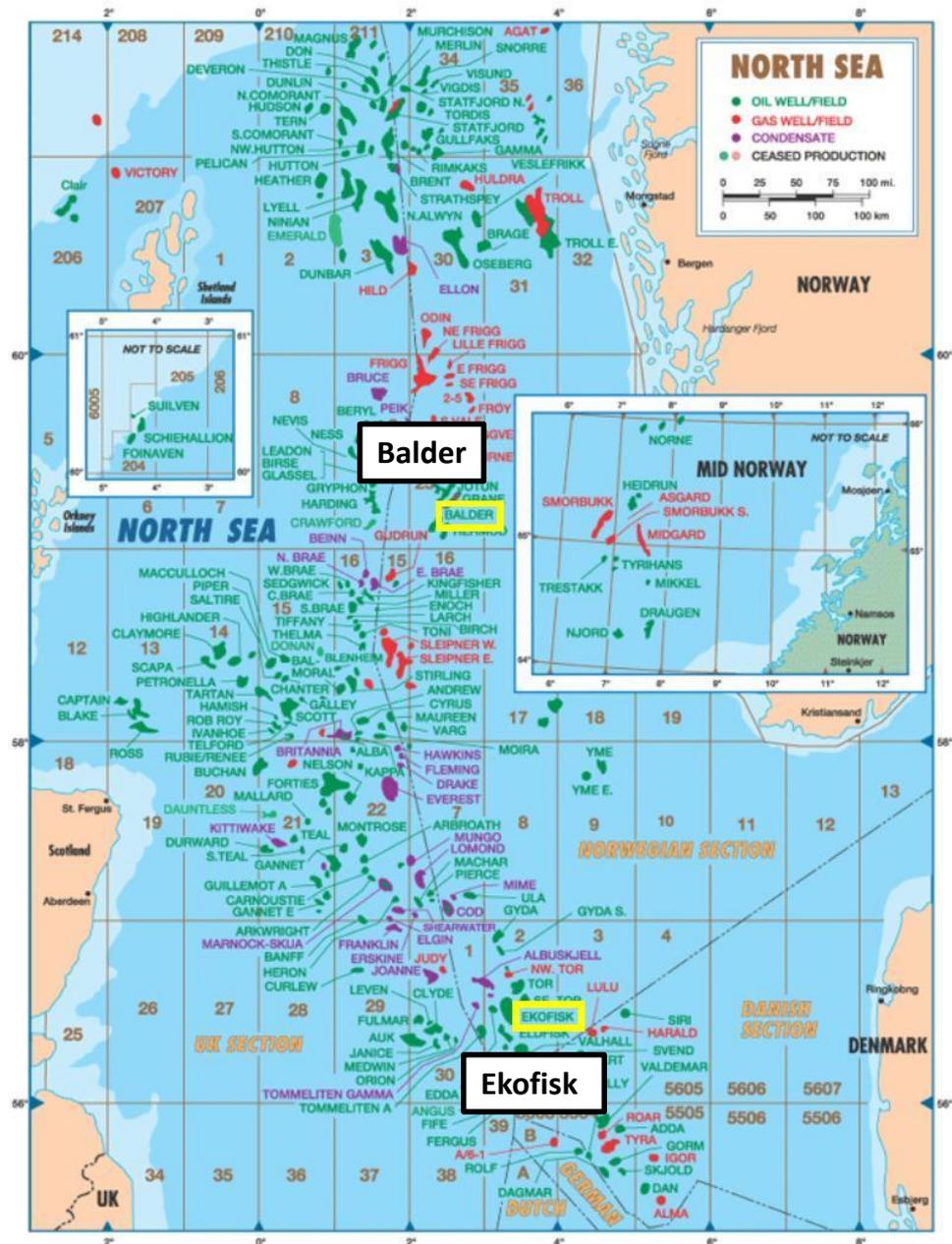


Figure 1: Location of Ekofisk and Balder Platforms

The airspace concerned is in the UK FIR but within airspace delegated from the UK to Avinor for the purposes of providing ATS, along the Median line. The proposed Class D volumes will replace two pre-existing ADS regions, from 1500ft to FL85. See Figure 2.

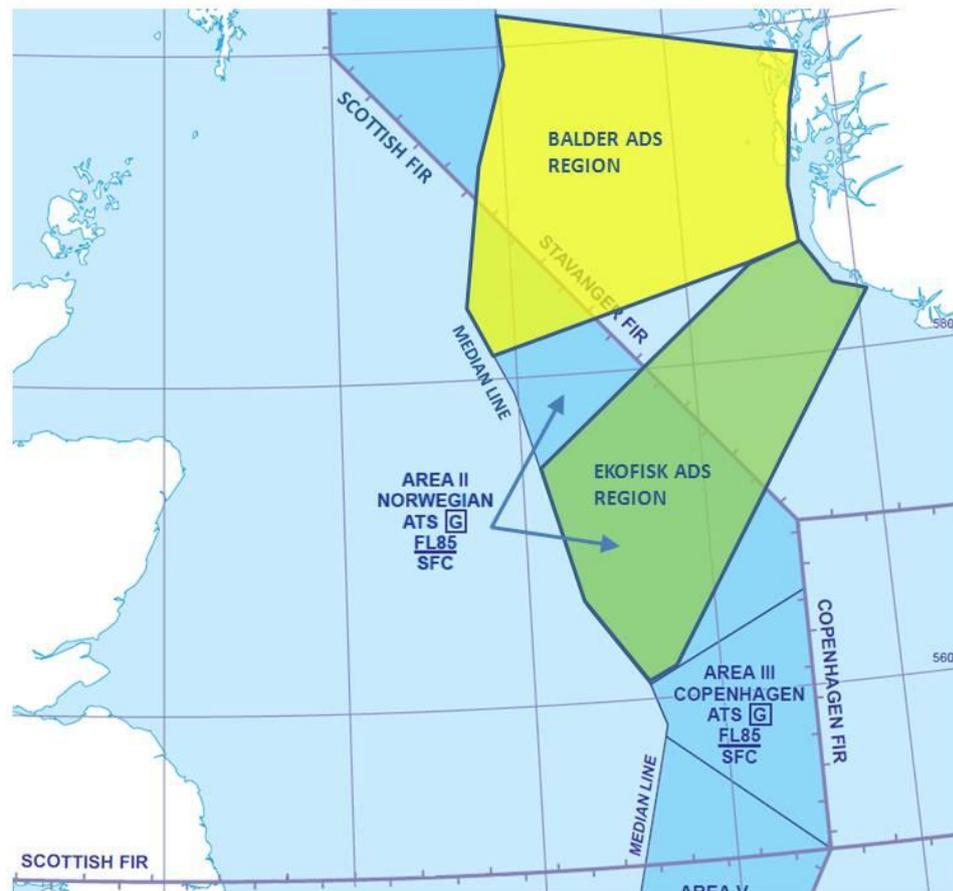


Figure 2: Delegated Airspace, Median Line & FIR Boundaries

This proposal is based on the principle that current users of the Class G ADS regions will not be disadvantaged by the introduction of Class D airspace in its place. Users should be afforded greater protection from operating within controlled airspace and through enhanced surveillance with the introduction of ADS-B technology, when compared to the current radar coverage and procedural control techniques.

Non-ADS-B equipped aircraft will be catered for through procedural techniques whilst the UK military will be able to enter the airspace using advanced notice coupled with procedural clearances or if urgent access is required they will be able to operate with due regard to other users.

These details will be defined in a Letter of Agreement between the UK and Norway.

This report describes the consultation process and sets out the issues and key themes identified by consultees. Those who responded raised no objections to the proposed changes. So, subject to satisfactory procedures being developed between the UK MoD and Norway, for MoD access to the proposed Class D airspace, NATS will submit a change proposal to the CAA for approval. If approved, it is expected that the change will be implemented in April 2015.

2 Confidentiality

The CAA Safety and Airspace Regulation Group (SARG) requires that all consultation material, including copies of responses from stakeholders, is included in any formal Airspace Change Proposal (ACP) submission to the CAA. Where specifically requested, details which may identify an individual will be removed before submission.

NATS undertakes not to disclose the personal details or content of responses and submissions to any third parties, apart from the necessary submission of material to the CAA and essential use by our consultants for analysis purposes in developing this report and subsequent ACP material.

3 Consultation Engagement

The consultation document was sent to the following stakeholders (list as agreed with the CAA):

- MOD
 - DAATM (Defence Airspace & Air Traffic Management)
 - MAA (Military Aviation Authority)
 - ISTAR (Intelligence, Surveillance, Target Acquisition & Reconnaissance)
 - NCHQ (Navy Command Head Quarters)
 - USAF, 3rd Air Force, Mildenhall
- NATMAC
 - SARG (Safety & Airspace Regulation Group)
 - NATS
 - Helicopter Club of Great Britain
 - PPL/IR Europe
 - British Helicopter Club of Great Britain

As the consultation ran for eight weeks a chasing email was sent on the 4th September 2014. No responses were received to the initial email with four responses being received to chaser email.

3.1 Statistics

A total of 10 consultees were individually contacted regarding this change, including five contacts within the Ministry of Defence. The breakdown of consultees is given in Figure 3.

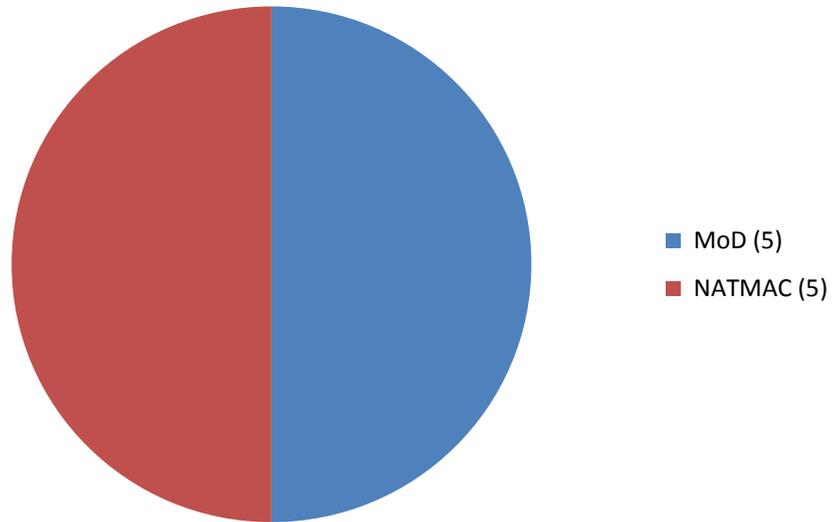


Figure 3: Breakdown of Consultees

The response rate from those contacted is illustrated in Figure 4 whilst Figure 5 breaks down the response rate by group. The nature of the response (support, no objection, object or null response¹) is given in Figure 6.

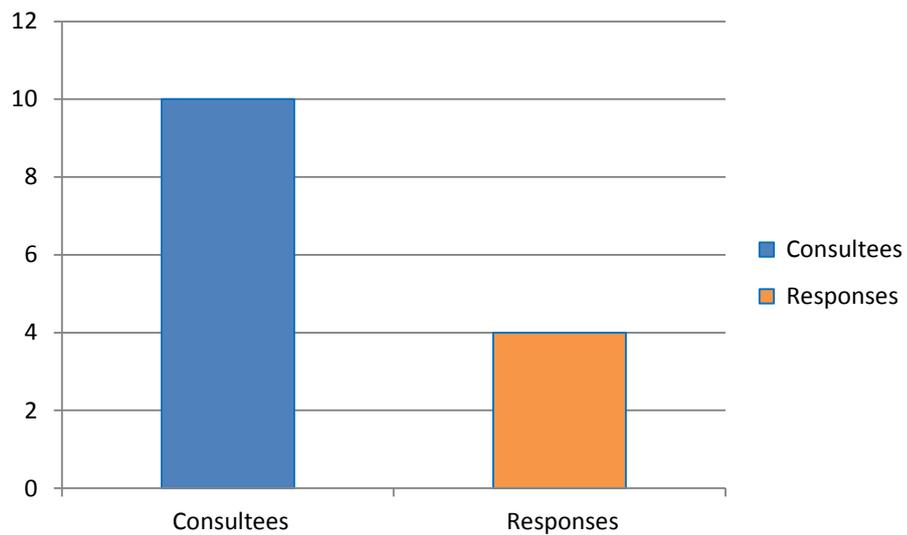


Figure 4: Response Rate

¹ Null response refers to an MoD reply which stated that DAATM would respond on behalf of all MOD consultees.

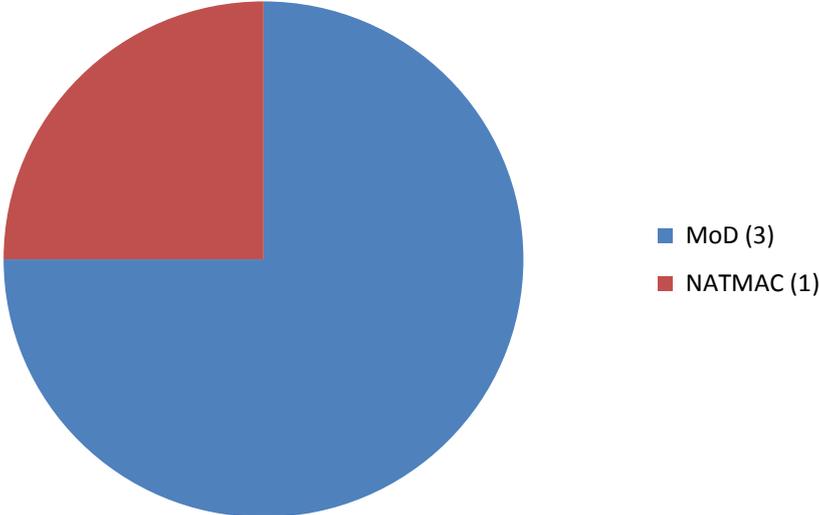


Figure 5: Breakdown of Responses by Consultee

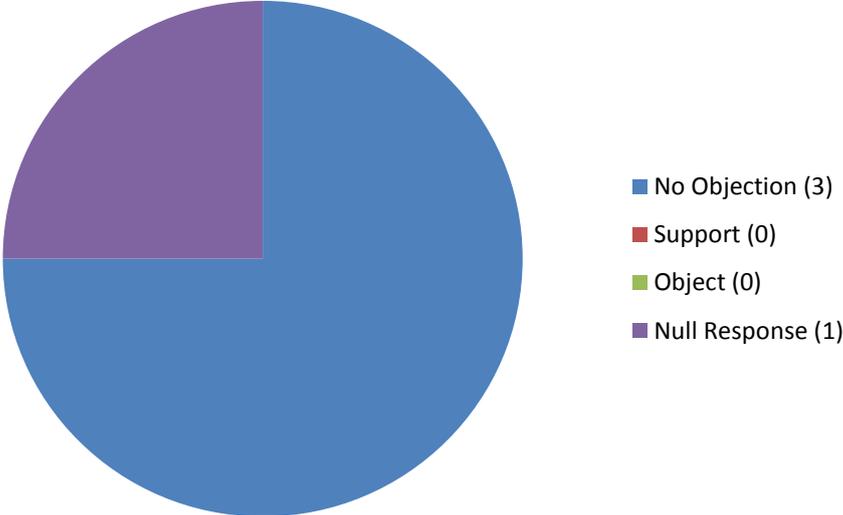


Figure 6: Nature of Responses

3.2 Consultee Responses

The consultation document covered the establishment of two volumes of Class D airspace in the existing Balder and Ekofisk ADS regions, as illustrated in Figure 2.

Of the ten consultees contacted, four responded.

Three of the responses (75%) raised 'no objection'. These included NATS, the MoD and Bond Offshore Helicopters.

The remaining response (25%) from USAFE-UK Mildenhall, commented that the MoD DAATM would send a consolidated response on their behalf.

3.2.1 NATS & Bond Offshore Helicopters

Neither NATS nor Bond Offshore Helicopters raised any issues in their responses of no objection. NATS commented that they saw no specific civil ATM issues arising as a result of the change, merely that they will be required to amend some LoAs with adjacent ACCs and introduce some system changes to highlight the new areas of CAS.

3.2.2 MoD

Engagement with the MoD through DAATM took place regularly before the start of and throughout the consultation process. A key issue of access was highlighted by the MoD. Whilst the majority of the time they would coordinate access with the relevant authority it was felt that there was an operational need to allow, on occasion, for uncoordinated access, with military aircraft operating with due regard to other airspace users.

In respect of this part of their formal response included text for an Annex to the UK/Norway Letter of Agreement. This text, for the airspace associated with the delegation of Air Traffic Services between Stavanger ATCC and Scottish AC (Prestwick) would enable the access they seek. The MoD also requested that the relevant information be included in the Aeronautical Information Publication.

The full MoD response, including the text for the Annex to the LoA is available in the Appendices, Ministry of Defence Response.

A further issue is the location of this additional text on access arrangements. As stated above, the MoD have requested it be included as an Annex to the UK/Norway LoA. There is an on-going discussion as to the most appropriate location for any additional operational procedures, taking into account the likely timescales for completion.

4 Summary of Intended Airspace Change Proposal

After careful consideration of the consultation responses, all of which raised no objection to the change and subject to caveats from the MoD regarding operational access procedures with the Norwegian ACC, NATS intends to submit the Airspace Change Proposal, on behalf of Avinor to the CAA.

If the proposal is approved by the CAA, the proposed implementation date for the Class D airspace is 30th April 2015 (AIRAC 5/2015). However achieving this date will depend upon several factors including the location of the revised access procedures and the time scales for obtaining signatures to these new arrangements.

All responses to the consultation will be forwarded to the CAA Safety and Regulation Group who will consider the merits of this proposal.

If you have any further comments you may wish to make, these will still be accepted and if they present new evidence, may still influence the final airspace change proposal (see Section 5.2, Further Correspondence & Feedback for details on submitting further responses).

5 Feedback to Consultees

This consultation feedback report will be made available to download on the NATS website (<http://www.nats.aero/environment/consultations>) and an email will be sent to all respondents directing them to the download page.

5.1 Post Implementation Review

Approximately twelve months after implementation of any airspace change, the sponsor (in this case NATS on behalf of Avinor) will be expected to carry out a post-implementation review of the change to assess and validate the success of the new arrangements. The purpose of the review will be to confirm that the Controlled Airspace is working as anticipated in the change proposal and has had the desired effect. The post-implementation review also provides an opportunity to identify any unforeseen issues that might have arisen and if so, address these.

This review is governed by the CAA CAP725 process and is conducted in conjunction with the CAA.

NATS is committed to ensuring that any change represents the best possible solution and takes into account concerns of consultees, operational constraints and the CAP725 legal framework.

5.2 Further Correspondence & Feedback

In the event that a representative organisation wishes to present new evidence or data to the Safety and Airspace Regulation Group Director, for consideration prior to making his regulatory decision regarding this proposal, the representative organisation must submit, in writing or via email, the information to the following address:

Head of Airspace Policy, Coordination & Consultation
Safety & Airspace Regulation Group,
CAA House,
45-49 Kingsway
London WC2B 6TE
Email: airspacepolicy@caa.co.uk

6 Consultation Emails & Web Text

6.1 Email Sent to Consultees

Dear Colleague,

NATS is proposing and Airspace Change on behalf of the Norwegian ANSP Avinor, which will see two Class D CTAs created in the North Sea from 1500ft MSL to FL85.

Please follow the link below to the NATS consultation page where a document can be downloaded which contains details of the change and instructions for responding to the consultation.

<http://www.nats.aero/environment/consultations/>

Best Regards,

NATS Airspace Change Team

6.2 NATS Web Landing Page

Ekofisk & Balder CTAs: North Sea Class D

Airspace around the Norwegian continental shelf is predominantly Class G with some areas split into ADS (Automatic Dependant Surveillance) regions, surrounding collections of oil and gas platforms. This consultation regards a proposal to implement Class D CTAs within two of these extant ADS regions, from 1500ft to FL85, in the vicinity of the Ekofisk & Balder platforms (Figure 1).

Although controlled by the Norwegian ANSP Avinor, many of the platforms sit inside of the Scottish FIR, within airspace in which ATS (Air Traffic Services) has been delegated to Norway (Stavanger). Therefore NATS is preparing and presenting this consultation and subsequent Airspace Change Proposal (ACP) on behalf of Avinor (Norway).

The period of consultation will start on the 25th July 2014 and run for 8 weeks to be completed on the 19th September 2014. If approved by the CAA, implementation is intended for the first quarter of 2015.

[Download the Consultation Letter](#)

6.3 Consultation Letter (PDF)



Consultation Letter

Appendices

Ministry of Defence Response

NORTH SEA CTAs (EKOFISK & BALDER) - CONSULTATION

Having considered the potential impact of the Airspace Change Proposal (ACP) to establish Class D CTAs from 1500ft to FL85 in the vicinity of the Ekofisk and Balder platforms in the North Sea, the MOD has no objection. This stance is subject to an agreed position being reached on procedures for airspace access, which should be captured as an Annex to the UK/Norway Letter of Agreement associated with the delegation of Air Traffic Services between Stavanger ATCC and Scottish AC (Prestwick). In addition, it is considered that these procedures would need to be captured and published within Aeronautical Information Publications (AIP) to ensure wider visibility to aircraft operators.

The procedures detailed at Annex A outline the coordination arrangements that the MOD would expect to be adopted to facilitate access to the Class D airspace. While this includes access rights under "due regard", it is acknowledged that for normal operational training sorties airspace access should be coordinated through the appropriate Norwegian control authority. With agreement to this Annex, the MOD is content with the ACP.

[Signed on DII]

D M Robertson
Cdr RN
DAATM SO1 Airspace



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