

All NATMAC Representatives

14 April 2016

CAA AIRSPACE CHANGE DECISION

RECLASSIFICATION OF THE BELFAST TERMINAL CONTROL AREA AIRSPACE

Organisation proposing the change: NATS (NSL)

Date of Airspace change proposal: 7th January 2016

Documents considered by the CAA:

Airspace Change Proposal dated 7th January 2016

Consultation Document

CAA Review of Belfast TMA Arrangements dated 9th November 2014

CAA Operational Assessment Annex C

CAA Consultation Assessment Annex D

1. Introduction

- 1.1 The Belfast Terminal control area (TMA) is a volume of airspace established at the confluence of ATS routes in the vicinity of two major commercial Belfast airports. The Belfast TMA and the Belfast airports' respective Control Zones and Control Areas (CTRs/CTAs) are a mix of Class D and Class E airspace.¹ This airspace change proposal is specifically seeking to reclassify those areas of the Belfast TMA that are currently Class E to Class D, so that both the Belfast TMA and airport CTR/CTAs would become standardised as Class D. This proposal did not seek to revise the airspace structure nor the published instrument flight procedures established within it.
- 1.2 In November 2014 the CAA undertook a review of the Belfast TMA airspace and its arrangements and operation. The history of this airspace and how it developed is similar to other TMA areas' growth. It is suspected that when first introduced (probably in excess of 30 years ago) traffic levels were considerably lighter than they are today and aircraft types and performance were noticeably different. Over time, largely as a result of the connectivity of the airways system and which has effectively formed the TMA, the airspace has just been added to and adapted in a piecemeal fashion, eventually creating the current arrangement which is an extremely complicated patchwork of areas of Class D and E airspace. The review identified that CAA internal emails dating back to 2009 had discussed

¹ Standardised European Rules of the Air - SERA.6001 Classification of airspaces

significant concerns regarding the complexity of the local airspace and the potential confusion to both pilots and controllers operating in that area.

- 1.3 In addition to the review, the justification centred on the impact of the rationalisation of Class F advisory route airspace in the UK. The airspace change proposal concept of operations document (CONOPS) identified that the subsequent introduction of Class E TMZ² ATS routes required changes to the CAP 413 Radiotelephony Manual, promulgated through MATS Part 1 SI 2014-04, which introduced a requirement for air traffic controllers to inform aircraft captains' of the change in airspace classification on each occasion they transit from Class D to Class E CAS. The SI was cancelled in April 2015, with the changes permanently incorporated into CAP 493, MATS Part 1.
- 1.4 In terms of the impact on the Belfast TMA where a complex matrix of areas of Class D and Class E airspace have historically existed, a potential hazard arose from the consequential effect of repeated classification change notifications. These potential hazards were mitigated by a limited and temporary exemption to MATS Part 1 SI 2014-04, pending preparation and delivery of an airspace change proposal (ACP). The patchwork of small Class D and Class E areas represented a safety hazard and rationalisation would deliver a safety benefit. The reclassification of the Class E airspace to Class D airspace removes the requirement for Belfast ATS providers to inform pilots when transitioning from Class D to Class E airspace, which in turn, removes the need for the temporary exemption that currently applies.

2. Information that has been considered

- 2.1 In making this decision, the Director SARG, CAA has considered a number of documents including the sponsor's airspace change proposal and consultation documents, the CAA case officer's Operational Report and CAA consultation representative's Consultation Report. The CAA's internal Review of the Belfast TMA Arrangements, which served to initiate this work and contributed to the justification for this proposal, was also considered.

3. Proposal Overview

- 3.1 As detailed at para 1.2 above, the proposal seeks to reclassify Belfast TMA Class E airspace to Class D airspace. This will harmonise a complex airspace structure from an airspace classification perspective. It does not address the other detailed structural concerns that result from a piecemeal composition that has resulted in a complicated and intricate airspace structure that demands acute awareness from both airspace users and the controlling authorities alike. Following the reclassification of the Belfast TMA airspace, a Phase 2 review will be undertaken by NATS as part of the Prestwick Lower Airspace Systemisation (PLAS). This large-scale NATS project is reviewing the Manchester, Scottish and Belfast TMAs and their associated airspace structures, whilst also introducing Performance-Based Navigation (PBN) procedures for each of the associated airports.

² Transponder Mandatory Zone airspace

4. Consultation

- 4.1 The change sponsor engaged with local aviation stakeholders ahead of the formal consultation to obtain their perspective. It was realised that the reclassification to Class D controlled airspace would impact on some recreational General Aviation (GA) visual flight rules (VFR) users due to Class D being controlled airspace where a clearance is required to enter the airspace, explained in SERA.6001. Routinely, it would be expected that GA VFR airspace users would comply with the conditions associated with the airspace classification but some operators, such as open-cockpit operations (hang-gliders and microlights) and non-motorised gliders, cannot easily comply with level-based clearances due to the characteristics of their operation.
- 4.2 The British Hang Gliding and Paragliding Association (BHPA) objected to justification link to the rationalisation of the Class F advisory airspace and the additional radio telephony requirements articulated in SI 2014-04. Additionally they commented that the structure needed to be reviewed. The BHPA was informed that the exemption to the SI 2014-04 ruling was a temporary measure pending submission of the ACP, which needed to address the complexity of the Belfast TMA structure formed from a complex mix of irregular Class D and Class E airspace blocks. Furthermore, they were informed that the legacy structural issues referred to above will be addressed as part of the NATS PLAS project
- 4.2 The Ulster Hang Gliding and Paragliding Club (UHPC) objected to the reclassification of the airspace due to the potential impact it would have on their members. A response to the UHPC representative has clearly outlined that their flying operations can be satisfied through letters of agreement with each site's operations.
- 4.3 The Ulster Gliding Club (UGC) objected on the grounds there was a potential impact on their cross-country activities, whereby they mainly fly VFR and non-RT and therefore cannot comply with fundamental airspace classification conditions listed at SERA.6001. However, further negotiations revealed that any access to the revised Belfast TMA airspace would be undertaken by radio-equipped gliders that can maintain two-way communication with the airspace controlling authority. Consequently it has been agreed by all stakeholder groups that a segregated glider box will be introduced to accommodate the UGC cross-country flights; it is anticipated that the activity will be relatively infrequent and the box only required at weekends.

5. Ministry of Defence

- 4.1 It was confirmed that the Ministry of Defence (MoD) had 'no objection' to the proposed reclassification of the airspace as it will have no impact on its operations.

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- 5.1 All other NATMAC stakeholders groups were either neutral or supported the reclassification to Class D CAS.

7. Safety

- 7.1 SERA.6001 clearly identifies that Class D airspace provides a known traffic environment that allows for both IFR and VFR access. Although Class D is more restrictive than Class E airspace, the considerable complexity of the Belfast TMA airspace structure has had to be offset by the need to introduce an exemption to the requirement to continue to pass information to aircraft operators transiting between Class E and Class D controlled airspace³. The rationalisation of the airspace to a single classification thereby consolidates the airspace as a less complex structure for airspace users and service providers and removes the need for an exemption to the procedures contained in MATS Part 1 derived from the establishment of Class E ATS routes that were introduced as part of the Class F advisory route rationalisation.
- 7.2 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.⁴ I am satisfied that by expanding the known traffic environment afforded by Class D airspace will serve to enhance the safety of operations in the local area, whilst continuing to facilitate use of the airspace by adjacent airspace users and transit aircraft of all types.

8. Environmental and economic impacts

- 8.1 There are no changes to IFR flight patterns or procedures. It is anticipated that there will be no environmental or economic impacts resulting from the reclassification of the Class E Belfast TMA areas to Class D airspace.

9 Regulatory decisions

- 9.1 To accommodate the airspace users' requirements, NATS and the two Belfast ATS units worked with local recreational aviation interests to try and meet their needs. To that end, flights undertaken from each of the UHPC sites will be managed through flexible use of airspace (FUA) arrangements detailed in letters of agreement (LoAs) between the UHPC sites and Belfast ATS units to ensure they have fair and equitable access to the affected airspace when required. Any UGC operations in the western extreme of the Belfast TMA will be facilitated by the introduction of a segregated glider box under FUA principles and detailed in an LoA with Belfast International ATS unit.
- 9.2 Overall, I am satisfied that all of the regulatory requirements have been met and the intention is that the revised airspace arrangements take effect on 26 May 2016 (AIRAC 06/2016). However, the implementation is conditional on each of the airspace user LOAs being signed by the relevant stakeholders prior to implementation. My staff will review the effectiveness of the arrangements 12 months after introduction and the results of this review will be published.

³ Initially detailed in MATS Part 1 SI 2014-04 and now incorporated into MATS Part 1, CAP 493

⁴ Transport Act 2000, Section 70(1).

9.3 If you have any queries, the CAA Project Leader is Mac Mackay, who can be contacted on 020 7453 6552 or airspace.policy@caa.co.uk

Yours sincerely,



M Swan

Group Director, Safety and Airspace Regulation

Enclosure:

1. Belfast TMA Airspace

