

**All NATMAC Representatives
Environmental Consultees**

02 October 2012

ERM/NATS-IAA IRISH SEA ACP Pt2

Dear Stakeholders,

CAA DECISION LETTER

**PROPOSED INTRODUCTION OF REVISED L975, L70 AND L10 ROUTE
STRUCTURE WEST OF WALLASEY**

1. INTRODUCTION AND PROPOSAL OVERVIEW

- 1.1 On 11th February 2011, Information Notice IN-2011/08 provided details of a NATS and Directorate of Airspace Policy Framework Briefing on a proposal to introduce improvements to the Irish Sea airspace structure. The scope of the proposal was split into 5 largely separate sub-proposals in the same geographic area, centred on the Isle of Man ATC Sector. Each sub-proposal has its own specific objectives. This proposal has been developed in accordance with the UK/Ireland Functional Airspace Block (FAB) principles. A FAB is an airspace block based on operational requirements and established regardless of State boundaries, where the provision of air navigation services and related functions are performance-driven and optimized with a view to introducing, in each functional airspace block, enhanced cooperation among air navigation service providers or, where appropriate, an integrated provider. The main driver for this proposal is the need to ensure that the airspace structure in the UK Flight Information Region (FIR) meets the needs of changes being made by the Irish Aviation Authority (IAA), the Irish air navigation service provider (ANSP), in the Dublin Terminal Manoeuvring Area (TMA). The IAA seeks to improve its operational and environmental efficiency by radically changing their airspace structure around Dublin airport, including new departure routes and implementation of a new method of managing arrival streams called Point-Merge. The proximity of the Dublin TMA to the London and Scottish boundaries means that changes in UK airspace are required to support those in the Shannon FIR and continue the development of the UK/Ireland FAB.
- 1.2 The airspace in the L70/L975/L10 complex over the Irish Sea has evolved over decades to accommodate changes in traffic patterns. Whilst the resultant airspace is fit for purpose, it would benefit from rationalisation. This proposal therefore aims to change the existing controlled airspace structure so that it is both simpler and more efficient.

- 1.3 Two specific objectives are associated with this proposal. The first is to provide sufficient CAS to reduce the likelihood of inefficient stepped descents for Dublin arrivals via BAGSO on L70. The second is to rationalise the bases of the routes by providing commonality between L70 and L975 – identified in yellow at Enclosure 1. Aligning the base levels will ensure that the boundaries are clearer and less complex, thus reducing the risk of any infringement by aircraft operating outside CAS or allowing aircraft to unexpectedly fly outside the limits of CAS.

2. AIRSPACE EFFICIENCY

- 2.1 I am required to secure the most efficient use of airspace consistent with the safe operation of aircraft and the expeditious flow of air traffic. I am satisfied that the proposal seeks to raise some base levels, thereby releasing CAS, whilst at the same time lowering other areas. Taking this sub-proposal in isolation as part of the larger package of changes affecting the overall Irish Sea airspace structure, the rationalisation of L70/L975/L10 will result in a reduction of 156 cubic nautical miles of controlled airspace over the existing structure. By aligning the base levels of the airways concerned, the new airspace structure will facilitate more efficient operations and contribute to continuous descent operations for Dublin arrivals from the east. The RAMOX buffer is introduced to ensure lateral separation between Dublin sectors positioning inbounds against outbounds on L975. Analysis of radar data has shown that at present, some aircraft have to level off at flight level (FL)180 (approx 18000 feet) as a result of the existing CAS structure. Dublin would prefer a continuous descent of traffic down to FL100 (approx 10000 feet) using an optimum profile to then join the new Dublin Point-Merge sequencing legs for runway 28.
- 2.2 When looking at other options to be considered, NATS initially considered seeking to expand CAS at lower levels to reduce the number of GAT movements that would have to exit CAS and request an air traffic service outside controlled airspace (ATSOCAS). However, following extensive stakeholder negotiations with the MoD where the needs of all airspace users were considered, a compromise was agreed, the outcome of which was the airspace structure put forward in this proposal. Aircraft leaving or routing IFR outside CAS can request an ATSOCAS from RAF Valley, LJAO or NATS' London Information.

3. AIRSPACE USERS

- 3.1 I am required to satisfy the requirements of operators and owners of all classes of aircraft. NATS completed extensive consultation with all affected aviation stakeholder groups as part of the development process. The results of the NATS' consultation indicated that elements of the aviation community raised the issue of additional Class A controlled airspace over the Irish Sea. I am satisfied that NATS considered all the stakeholder requirements by balancing the requirement for additional CAS against the release of volumes of other Class A CAS airspace by raising the base levels elsewhere, where considered appropriate. Class A was also selected over other classifications due to the complexity and high-workload associated with the Prestwick Centre IOM Sector, which would mean that controllers would rarely if ever be able to provide a crossing clearance to VFR traffic. The area of Class C CAS in the vicinity of the FIR boundary is in an area where air traffic services are delegated from NATS to Dublin ATC and match the existing adjacent Class C airspace in the Dublin TMA.

- 3.2 The results of NATS' consultation enabled it to identify areas of CAS that could be removed. L10 will be raised from FL65 to FL75 between PENIL and CASEL, providing an increased 1000ft of Class G uncontrolled airspace. L10 and L975 will be raised from 3500 feet to FL 45 west of Wallasey, again providing increased Class G uncontrolled airspace. This airspace was established for use by arrivals to and departures from Liverpool John Lennon airport. Analysis showed that it was rarely used at these levels and NATS declared that it was therefore no longer required.
- 3.3 The MoD is satisfied that the RAF Valley operational requirements are in the main accommodated by the new LYNAS corridor (RVC) from Designated Base (DB) to FL170 through L975/L70 and FL170 through L15/L10). However, due to the lack of solid primary radar cover, certain parts of the corridor will require aircraft to receive a procedural clearance to allow climb into, transit through, or descent out of, CAS.

4. INTERESTED OTHER PARTIES

- 4.1 I am also required to take account of the interests of any other person (other than an operator or owner of an aircraft) in relation to the use of any particular airspace or the use of airspace generally. I am satisfied that as this airspace development is wholly contained over the sea, there is little or no impact on non-aviation stakeholders.

5. ENVIRONMENTAL CONSIDERATIONS

- 5.1 I have considered the environmental impact of air operations and concluded that it is not possible to demonstrate an overall environmental benefit because the potential benefit from lowering the airspace at RAMOX cannot be quantified or robustly estimated as it is predicated on Dublin traffic flows. The continuous descent operations are more efficient than when aircraft are subject to stepped descents. Environmental Research and Consultation Department stated that this aspect of the airspace change is very unlikely to have a negative environmental impact. As the airspace changes are all over the sea, CO₂ emissions are the only environmental impact for consideration in this sub-proposal, as no other factors would have an impact on determining if there is an overall environmental benefit.

6. SAFETY

- 6.1 As my primary duty is to maintain a high degree of safety in the provision of air traffic services, my staff, together with colleagues from the Safety Regulation Group of the CAA have confirmed that the proposed airspace design and associated management arrangements can be safely adopted. The appropriate safety management processes resulting from this airspace change will be completed prior to the introduction of any operational change and thus safety levels will be assured.

7. NATIONAL SECURITY

- 7.1 I am satisfied that national security will not be impacted by this proposal and the specific consultation requirements with the Secretary of State for Defence have

been discharged by correspondence with the MoD who has confirmed it is content with the proposal.

8. REGULATORY DECISION

- 8.1 I am satisfied that the new airspace arrangements will help support greater efficiency in the Dublin TMA, and will not unduly disadvantage other airspace users. I am also satisfied that the aligned airspace bases will reduce complexity whilst also freeing up areas of uncontrolled airspace and meet with the operational requirements of the MoD. I am also satisfied that the single option put forward in the consultation was the only viable option, as it provided greater flexibility and a potential reduction in CO₂ emissions.
- 8.2 I have therefore decided to approve the revised ATS route structure to accommodate better descent profiles into Dublin and to simplify the existing complexity of existing base levels. The revised airspace will become effective from 13 December 2012. My staff will review the effectiveness of the arrangements not before 12 months after introduction and the results of this review will be published.
- 8.3 If you have any queries, the DAP Project Leaders are Mac Mackay and Clive Grant, who can be contacted on 020 7453 6552/6551, mac.mackay@caa.co.uk or clive.grant@caa.co.uk

Yours sincerely,

Mark Swan

Mark Swan
Director

Enclosure: 1. Revised L975/L70/L10 and LYNAS RVC

