Safety and Airspace Regulation Group		
Page 1 of 12	Airspace Change Proposal - Operational Assessment	Version: 1.0/ 2016

Title of Airspace Change Proposal	Subdivision of EGD201
Change Sponsor	MOD
SARG Project Leader	
Case Study commencement date	20 <sup>th</sup> February 2018
Case Study report as at	7 <sup>th</sup> June 2018
File Reference	161208 - Subdivision of EGD201

## Instructions

In providing a response for each question, please ensure that the 'Status' column is completed using the following options:

- Yes
- No
- Partially
- N/A

To aid the SARG Project Leader's efficient Project Management it may be useful that each question is also highlighted accordingly to illustrate what is:

resolved on tresolved Amber not compliant as part of the AR Project Leader's efficient project management.

Safety and Airspace Regulation Group		
Page 2 of 12	Airspace Change Proposal - Operational Assessment	Version: 1.0/ 2016

1.	Justification for change and "Option Analysis"	Status
1.1	Is the explanation of the proposed change clear and understood?	YES
	The MOD has proposed a subdivision of EGD201 and the removal of EG D201E which will be incorporated in the EG D201 and EG D202 Danger Area complexes. The proposal also seeks to standardize the naming convention of both the EG D201 and EG D202 Danger Area complexes.	
1.2	Are the reasons for the change stated and acceptable?	YES
	The primary drivers for change is to improve FUA and simplify ASM processes for both Aberporth Range Control and West Wales Airport. The proposed change aligns to UK Danger Area policy.	
1.3	Have all appropriate alternative options been considered, including the 'do nothing' option?	YES
	The proposed change option aligns to the SARG Danger Area policy; specifically, the Danger Area Sponsor is proposing a change to enable the use of the minimum airspace necessary to conduct the hazardous activity. Therefore, the CAA is content that the 'do nothing' option can be discounted.	
1.4	Is the justification for the selection of the proposed option sound and acceptable?	YES
	The justification is made primarily on the grounds of improving FUA and simplifying ASM processes. This justification is in line with the SARG Danger Area policy and is therefore considered sound and acceptable.	

2.	Airspace Description and Operational Arrangements	Status
2.1	Is the type of proposed airspace clearly stated and understood?	YES
	The ACP proposes a change to the Danger Area structures of EG D201 and EG D202 without increasing the overall volume of the Danger Area complexes.	
2.2	Are the hours of operation of the airspace and any seasonal variations stated and acceptable?	YES
	Both EG D201 and EG D202 Danger Area complexes are activated by NOTAM when required. This is in line with CAP 740 and is therefore considered acceptable.	
2.3	Is any interaction with adjacent domestic and international airspace structures stated and acceptable including an	YES

Safety and Airspace Regulation Group		
Page 3 of 12	Airspace Change Proposal - Operational Assessment	Version: 1.0/ 2016

	explanation of how connectivity is to be achieved? Has the agreement of adjacent States been secured in respect		
	of High Seas airspace changes?		
	The proposed change is likely to increase the availability of ATS route L18 which will improve the network connectivity between Ireland. This has been assessed as a positive impact of the change proposal. The proposed changes do not directly affect the FIR boundary.		
2.4	Is the supporting statistical evidence relevant and acceptable?	N/A	
	No statistical data was included in the Impact Assessment.		
2.5	Is the analysis of the impact of the traffic mix on complexity and workload of operations complete and satisfactory?	YES	
	The proposed change will not impact the traffic mix or complexity. The ASM operational workload of Aberporth Range control and West Wales Airport should reduce as a result of the proposed change.		
2.6	Are any draft Letters of Agreement and/ or Memoranda of Understanding included and, if so, do they contain the commitments to resolve ATS procedures (ATSD) and airspace management requirements?	YES	
	No LoAs were included in the impact assessment, however, the sponsor does conclude that one LoA can be deleted due to the simplified ASM and NOTAM publication process that the change will facilitate.		
2.7	Should there be any other aviation activity (low flying, gliding, parachuting, microlight site etc) in the vicinity of the new airspace structure and no suitable operating agreements or ATC Procedures can be devised, what action has the sponsor carried out to resolve any conflicting interests?	YES	
	The sponsor has concluded that the change to the boundary between EG D201 and EG D202 Danger Areas complexes will enable GA to route around EG D201 more easily using the A487 road as a navigational feature. They also argue that this should reduce the likelihood of inadvertent penetration of EG D201. The sponsor also makes the case that by splitting EG D201E and incorporating the resultant segments into the proposed EG D201H and EG D202D, will enable more effective access to West Wales Airport.		
2.8	Is the evidence that the Airspace Design is compliant with ICAO SARPs, Airspace Design & FUA regulations, and Eurocontrol Guidance satisfactory?	YES	
	By seeking to subdivide the Danger Areas to segregate the minimum airspace necessary to conduct hazardous activity, the proposal is compliant with ICAO SARPs and Airspace Design and FUA regulations. The proposal to split the current EG D201E between the proposed EG D201H and EG D202D will result in the portion that is incorporated into EG D201H always being activated to the same level as the current EG D201 rather that the occasional higher activation that is currently catered for in the AIP. However, this will be offset against the fact the at the portion of EG D201E incorporated into EG D202D will only be activated to a maximum level of FL125.		

Safety and Airspace Regulation Group		
Page 4 of 12	Airspace Change Proposal - Operational Assessment	Version: 1.0/ 2016

2.9	Is the proposed airspace classification stated and justification for that classification acceptable?	N/A	
2.0		N/A	
	No change.		
2.10	Within the constraints of safety and efficiency, does the airspace classification permit access to as many classes of user as practicable?	YES	
	The key driver for the change is to improve FUA, the Impact Assessment concludes that the change will improve access to ATS route L18 and access to West Wales airport.		
2.11	Is there assurance, as far as practicable, against unauthorised incursions? (This is usually done through the classification and promulgation)	YES	
	There is no proposed change to the airspace classification or promulgation method. However, by splitting the existing EG D20 proposed change will remove the requirement to deactivate EG D201E by NOTAM when Aberporth no longer require the airspace West Wales immediately issuing a NOTAM to reactivate the Danger Area so that they can continue their operations. Thereby the notified status of the Danger Area.	pace and then	
2.12	Is there a commitment to allow access to all airspace users seeking a transit through controlled airspace as per the classification, or in the event of such a request being denied, a service around the affected area?	YES	
	Yes - no change to DACS.		
2.13	Are appropriate arrangements for transiting aircraft in place in accordance with stated commitments?	YES	
	Yes - no change.		
2.14	Are any airspace user group's requirements not met?	NO	
	The proposed change will benefit CAT, GA and the airspace managers at Aberporth Range Control and West Wales airport.		
2.15	Is any delegation of ATS justified and acceptable? (If yes, refer to Delegated ATS Procedure).	YES	
	Yes - no change.		
2.16	Is the airspace structure of sufficient dimensions with regard to expected aircraft navigation performance and manoeuvrability to contain horizontal and vertical flight activity (including holding patterns) and associated protected areas in both radar and non-radar environments?	YES	

Safety and Airspace Regulation Group		
Page 5 of 12	Airspace Change Proposal - Operational Assessment	Version: 1.0/ 2016

	Yes, the subdivision of EGD201 will enable West Wales Airport, and on occasion Aberporth Range, to segregate a smaller pairspace to conduct UAS trials.	ortion of
2.17	Have all safety buffer requirements (or mitigation of these) been identified and described satisfactorily (to be in accordance with the agreed parameters or show acceptable mitigation)? (Refer to buffer policy letter).	YES
	The proposal clearly articulates that, when West Wales activate the proposed EG D201H Danger Area, they will rarely require the airspace above FL180. This will enable ATS route L18 to be made available for flight planning at FL200 and therefore the 2000ft vertical buffer is applied. The proposed split of EG D201E will not impact the procedural application of the buffer against ATS route UN14.	
2.18	Do ATC procedures ensure the maintenance of prescribed separation between traffic inside a new airspace structure and traffic within existing adjacent or other new airspace structures?	N/A
	The proposal does not change any ATC procedures.	
2.19	Is the airspace structure designed to ensure that adequate and appropriate terrain clearance can be readily applied within and adjacent to the proposed airspace?	N/A
	N/A.	
2.20	If the new structure lies close to another airspace structure or overlaps an associated airspace structure, have appropriate operating arrangements been agreed?	YES
	The proposed change is designed to enhance FUA and simplify the ASM processes of the EG D201 and EG D202 Danger A complexes. The operating arrangements are appropriate and have been agreed between Aberporth Range Control and Wes Airport.	
2.21	Where terminal and en-route structures adjoin, is the effective integration of departure and arrival routes achieved?	N/A
	N/A.	

Safety and Airspace Regulation Group		
Page 6 of 12	Airspace Change Proposal - Operational Assessment	Version: 1.0/ 2016

3.	Supporting Resources and CNS Infrastructure	Status
3.1	Is the evidence of supporting CNS infrastructure together with availability and contingency procedures complete and acceptable? The following are to be satisfied:	
	<ul> <li>Communication: Is the evidence of communications infrastructure including RT coverage together with availability and contingency procedures complete and acceptable? Has this frequency been agreed with AAA Infrastructure?</li> </ul>	YES
	Appropriate communication facilities are already in place and no changes are included in the proposal.	
	Navigation: Is there sufficient accurate navigational guidance based on in-line VOR or NDB or by approved RNAV derived sources, to contain the aircraft within the route to the published RNP value in accordance with ICAO/ Eurocontrol Standards? Eg. Navaids – has coverage assessment been made eg. a DEMETER report, and if so, is it satisfactory?	YES
	No change.	
	<ul> <li>Surveillance: Radar Provision – have radar diagrams been provided, and do they show that the ATS route / airspace structure can be supported?</li> </ul>	YES
	No change.	
3.2	Where appropriate, are there any indications of the resources to be applied, or a commitment to provide them, in line with current forecast traffic growths acceptable?	N/A
	There is no intention to increase traffic growth or resources through the introduction of this proposal.	

Safety and Airspace Regulation Group		
Page 7 of 12	Airspace Change Proposal - Operational Assessment	Version: 1.0/ 2016

4.	Maps/Charts/Diagrams	Status
4.1	Is a diagram of the proposed airspace included in the proposal, clearly showing the dimensions and WGS84 coordinates? (We would expect sponsors to include clear maps and diagrams of the proposed airspace structure(s) – they do not have to accord with AC&D aeronautical cartographical standards (see CAP725), rather they should be clear and unambiguous and reflect precisely the narrative descriptions of the proposals. AC&D work would relate to regulatory consultation charts only).	YES
	Yes. The coordinates have been ratified by the CAA technical specialist.	
4.2	Do the charts clearly indicate the proposed airspace change?	YES
	Yes.	
4.3	Has the Change Sponsor identified AIP pages affected by the Change Proposal and provided a draft amendment?	YES
	Yes, they have been specified in Annex B of the Impact Assessment.	

Safety and Airspace Regulation Group		
Page 8 of 12	Airspace Change Proposal - Operational Assessment	Version: 1.0/ 2016

5.	Operational Impact	Status	
5.1	Is the Change Sponsor's analysis of the impact of the change on all airspace users, airfields and traffic levels, and evidence of mitigation of the effects of the change on any of these, complete and satisfactory?  Consideration should be given to:  a) Impact on IFR GAT, on OAT or on VFR general aviation traffic flow in or through the area.	YES	
	Yes. The proposal has been assessed as having a positive impact on IFR GAT by increasing the flight plan availability of ATS In addition, OAT will benefit when the proposed EG D201H is activated, namely OAT operating in the NWMTA North areas. The ASM and NOTAM process, and the removal of EG D201E should provide benefit to GA flying close to the Danger Area be	he changes to	
	b) Impact on VFR Routes.	N/A	
	No specific routes are affected.		
	c) Consequential effects on procedures and capacity, ie on SIDS, STARS, holds. Details of existing or planned routes and holds.	YES	
	The proposal will result in an increase in flight plan availability of ATS route L18.		
	d) Impact on Airfields and other specific activities within or adjacent to the proposed airspace.	YES	
	The proposal will improve the airspace management and notification process for the activation of the EG D201 and EG D202 complexes. This process change will improve access to West Wales airport for GA.	Danger Area	
	e) Any flight planning restrictions and/ or route requirements.	YES	
	Activating a smaller volume of SUA to the maximum altitude of FL 180 will enable ATS route L18 to be available for flight planning more often.		
5.2	Does the Change Sponsor Consultation letter reflect the likely operational impact of the change?	N/A	
	Due to the positive impact of the proposed change and that the proposal is in line with SARG Danger Area policy the CAA con no formal consultation was required.	ncluded that	

Safety and Airspace Regulation Group		
Page 9 of 12	Airspace Change Proposal - Operational Assessment	Version: 1.0/ 2016

6.	Economic Impact	Status
6.1	Is a provisional economic impact assessment to all categories of operations and users likely to be affected by the change included and acceptable? (This may include any forecast capacity gains and the cost of any resultant additional track mileage).	PARTIALLY
	An economic impact assessment was included with the proposal. However, the change is aligned to SARG Danger Area policy and the resultant increase in availability of ATS route L18 is likely to have a small economic benefit.	

Safety and Airspace Regulation Group		
Page 10 of 12	Airspace Change Proposal - Operational Assessment	Version: 1.0/ 2016

Case Study Conclusions – To be completed by SARG Project Leader	Yes/No
Has the Change Sponsor met the SARG Airspace Change Proposal requirements and Airspace Regulatory requirements above?	YES

The Sponsor has provided an adequate proposal in the form of an impact assessment that fully articulates the proposed change and considers the impact to other airspace users. As agreed by the CAA, the sponsor was not required to conduct a formal consultation.

Outsta	Outstanding Issues		
Serial	Issue	Action Required	
1			
2			

Additio	Additional Compliance Requirements (to be satisfied by Change Sponsor)	
Serial	Requirement	
1		
2		

Safety and Airspace Regulation Group		
Page 11 of 12	Airspace Change Proposal - Operational Assessment	Version: 1.0/ 2016

Recommendations	Yes/No
Is the approval of the SoS for Transport required in respect of the Environmental Impact of the airspace change?	NO
No	
Is the approval of the MoD required in respect of National Security issues surrounding the airspace change?	NO
No	

## **General Summary**

The MoD proposal primarily aims to improve FUA and the ASM and notification processes. In addition, it also aims to standardize the naming convention for the EG D201 and EG D202 Danger Area complexes. In doing so the proposal complies with the SARG Danger Area policy in that it will amend the Danger Area design to enable the segregation of the minimum volume of airspace required to conduct hazardous activity. The sponsor has considered the impact to other airspace users and has concluded that the impact to GAT, OAT and GA will be positive. The sponsor did not provide an economic assessment in the proposal. However, the fact that the proposal complies with SARG policy and is designed to improve FUA in accordance with UK and EU regulations, indicates that the change should have a small positive economic impact.

## **Comments & Observations**

Nil

Page 12 of 12 Airspace Change Proposal - Operational Assessment Version: 1.0/ 2016

Operational Assessment Sign-off/ Approvals	Name	Signature	Date
Operational Assessment completed by:	AR Case Officer		6 June 2018
Operational Assessment approved:	Head of AAA		8 June 2018

Mgr AAA Comments: This change represents simplification of FUA, more access to airways, subdivision of an existing Danger area to allow UAS trials use of a smaller area, simpler navigation feature for GA to avoid infringing the area. This is a compelling case and is approved.