

24 June 2015
EIR Reference: E0002342

Dear XXXX

I am writing in respect of your recent request, contained in your letter of 26 April 2015 to Andrew Haines, for the release of information held by the Civil Aviation Authority (CAA). We have considered your request in line with the provisions of the Environmental Information Regulations 2004 (EIRs), and I am sorry for the delay in our response. The CAA is receiving a lot of correspondence on similar issues, including requests for information under the EIRs, and we are dealing with these requests in the order in which they are received. It is of course a matter of regret that the CAA has not been able to reply to your request within the time frame set out in the EIRs. However the CAA Board constantly monitors the CAA's adherence to these time frames and keeps under consideration how it can meet its obligations under the EIRs whilst at the same time performing its other regulatory functions.

Your request, in relation to a procedural change on the Compton departure route from Heathrow made by NATS, was for *all the documentation, which must exist, that relates to the reasons for the change, the analysis carried out on the change and who signed the change off. The change process detailed in CAP725 states that having identified a need for change the sponsor should arrange a briefing meeting with Directorate of Airspace Policy (of the CAA). Sensibly the CAA, being responsible for airspace safety would be involved in all stages of the change process so the documentation I am seeking must be in CAA files.*

Andrew Haines has explained in his response to your letter why this procedural change did not constitute a change to the notified features of airspace published in the UK Aeronautical Information Publication, and, therefore, that the airspace change process detailed in CAP725 did not apply.

As we had no legal function to perform, the information that we hold regarding the reasons for the procedural change, and any analysis carried out on it, is limited to an analysis we carried out to understand the cause of complaints we started to receive. A copy of that information is attached.

Some personal data has been redacted in accordance with Regulation 13 of the EIRs, as disclosure would be unfair to the individuals concerned and would therefore contravene the first data protection principle that personal information must be processed fairly and lawfully. A copy of this exception can be found below.

Civil Aviation Authority

Aviation House Gatwick Airport South Gatwick RH6 0YR www.caa.co.uk
Telephone 01293 768512 foi.requests@caa.co.uk

If you are not satisfied with how we have dealt with your request in the first instance you should approach the CAA in writing at:-

Caroline Chalk
Head of External Information Services
Civil Aviation Authority
Aviation House
Gatwick Airport South
Gatwick
RH6 0YR

caroline.chalk@caa.co.uk

The CAA has a formal internal review process for dealing with appeals or complaints in connection with requests under the Environmental Information Regulations. The key steps in this process are set in the attachment.

Should you remain dissatisfied with the outcome you have a right to appeal against the decision by contacting the Information Commissioner at:-

Information Commissioner's Office
FOI/EIR Complaints Resolution
Wycliffe House
Water Lane
Wilmslow
SK9 5AF

www.ico.gov.uk/complaints.aspx

If you wish to request further information from the CAA, please use the form on the CAA website at <http://www.caa.co.uk/application.aspx?catid=286&pagetype=65&appid=24>.

Yours sincerely

A handwritten signature in black ink, appearing to read 'M Stevens'.

Mark Stevens
External Response Manager

CAA INTERNAL REVIEW & COMPLAINTS PROCEDURE

- The original case to which the appeal or complaint relates is identified and the case file is made available;
- The appeal or complaint is allocated to an Appeal Manager, the appeal is acknowledged and the details of the Appeal Manager are provided to the applicant;
- The Appeal Manager reviews the case to understand the nature of the appeal or complaint, reviews the actions and decisions taken in connection with the original case and takes account of any new information that may have been received. This will typically require contact with those persons involved in the original case and consultation with the CAA Legal Department;
- The Appeal Manager concludes the review and, after consultation with those involved with the case, and with the CAA Legal Department, agrees on the course of action to be taken;
- The Appeal Manager prepares the necessary response and collates any information to be provided to the applicant;
- The response and any necessary information is sent to the applicant, together with information about further rights of appeal to the Information Commissioners Office, including full contact details.

Environmental Information Regulations – Regulations 13

(1) To the extent that the information requested includes personal data of which the applicant is not the data subject and as respects which either the first or second condition below is satisfied, a public authority shall not disclose the personal data.

(2) The first condition is—

(a) in a case where the information falls within any of paragraphs (a) to (d) of the definition of “data” in section 1(1) of the Data Protection Act 1998, that the disclosure of the information to a member of the public otherwise than under these Regulations would contravene—

(i) any of the data protection principles; or

(ii) section 10 of that Act (right to prevent processing likely to cause damage or distress) and in all the circumstances of the case, the public interest in not disclosing the information outweighs the public interest in disclosing it; and

(b) in any other case, that the disclosure of the information to a member of the public otherwise than under these Regulations would contravene any of the data protection principles if the exemptions in section 33A(1) of the Data Protection Act 1998(1) (which relate to manual data held by public authorities) were disregarded.

(3) The second condition is that by virtue of any provision of Part IV of the Data Protection Act 1998 the information is exempt from section 7(1) of that Act and, in all the circumstances of the case, the public interest in not disclosing the information outweighs the public interest in disclosing it.

(4) In determining whether anything done before 24th October 2007 would contravene any of the data protection principles, the exemptions in Part III of Schedule 8 to the Data Protection Act 1998 shall be disregarded.

(5) For the purposes of this regulation a public authority may respond to a request by neither confirming nor denying whether such information exists and is held by the public authority, whether or not it holds such information, to the extent that—

(a) the giving to a member of the public of the confirmation or denial would contravene any of the data protection principles or section 10 of the Data Protection Act 1998 or would do so if the exemptions in section 33A(1) of that Act were disregarded; or

(b) by virtue of any provision of Part IV of the Data Protection Act 1998, the information is exempt from section 7(1)(a) of that Act.

Stevens Mark

From: [REDACTED]
Sent: 14 May 2015 14:59
To: [REDACTED]
Subject: FW: Heathrow Vectoring Differences.
Attachments: TOI093.14 LTC.PDF; July - Jan 2015 All 09RCPT deps by height.png; Jan - Jun 2014 09RCPT deps through zone by height.png

From: [REDACTED]
Sent: 06 March 2015 11:50
To: [REDACTED]
Subject: FW: Heathrow Vectoring Differences.

From: [REDACTED]
Sent: 09 February 2015 14:48
To: [REDACTED]
Cc: [REDACTED]@heathrow.com'; [REDACTED]
Subject: Heathrow Vectoring Differences.

Dear [REDACTED]

With lots of help from [REDACTED] at HAL and [REDACTED] in ERCD.

In support of your response to [REDACTED] I have done some digging and read through all the relevant NATS' operational Temporary Operating Instructions issued internally at Swanwick and Heathrow Tower.

The first and foremost point to make is that no 'notified' procedures or routes in the Aeronautical Information Publication (AIP), Standard Routing Document (SRD) or Route Availability Document (RAD) have changed. The PIBUG trial SIDs - designed to better replicate the currently notified (but unused) Runway 09Left/Right CPT departures - have been completely removed; they were only actually used for a couple of hours in any case.

The Heathrow Airport Tower Controllers are still using the same tactical clearance, employed both before and after the PIBUG SID Trial, of climb ahead to LON 2DME and turn right heading 220°, climbing to altitude 6000ft. From a purely Heathrow Airport operational perspective nothing has change.

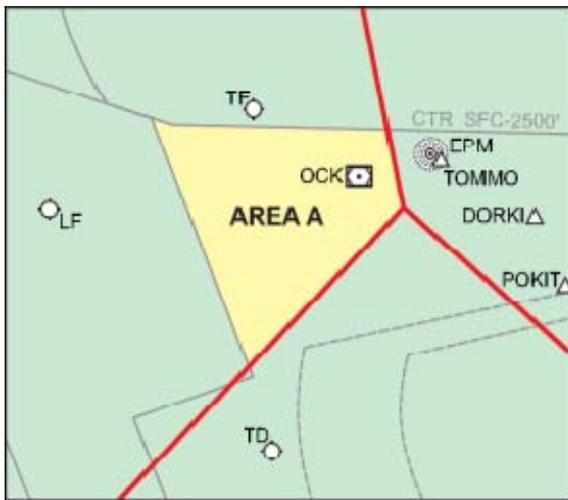
But we know that whilst the same broad swathe does still exists for CPT departures that head West after departing from RWY09L/R, there has been a definite shift in focus, with more tracks being on the north-side of that original swathe.

This lead to me looking at the Heathrow/Terminal Control South radar operation based down at NATS Swanwick. Again from the notified point of view nothing has changed and the Heathrow Radar Manoeuvring Areas (RMA (...having two as the RMA changes based on the runway in use)), within which the Heathrow radar controllers are free to radar vector (tactically turn) aircraft, are also unchanged. Also the Noise Abatement requirements, the height after which a controller can tactically turn an aircraft, are unchanged.

What has changed is the trial of a revised internal co-ordination requirement and standing agreement between Heathrow and Terminal Control South radar controllers; this has two elements:

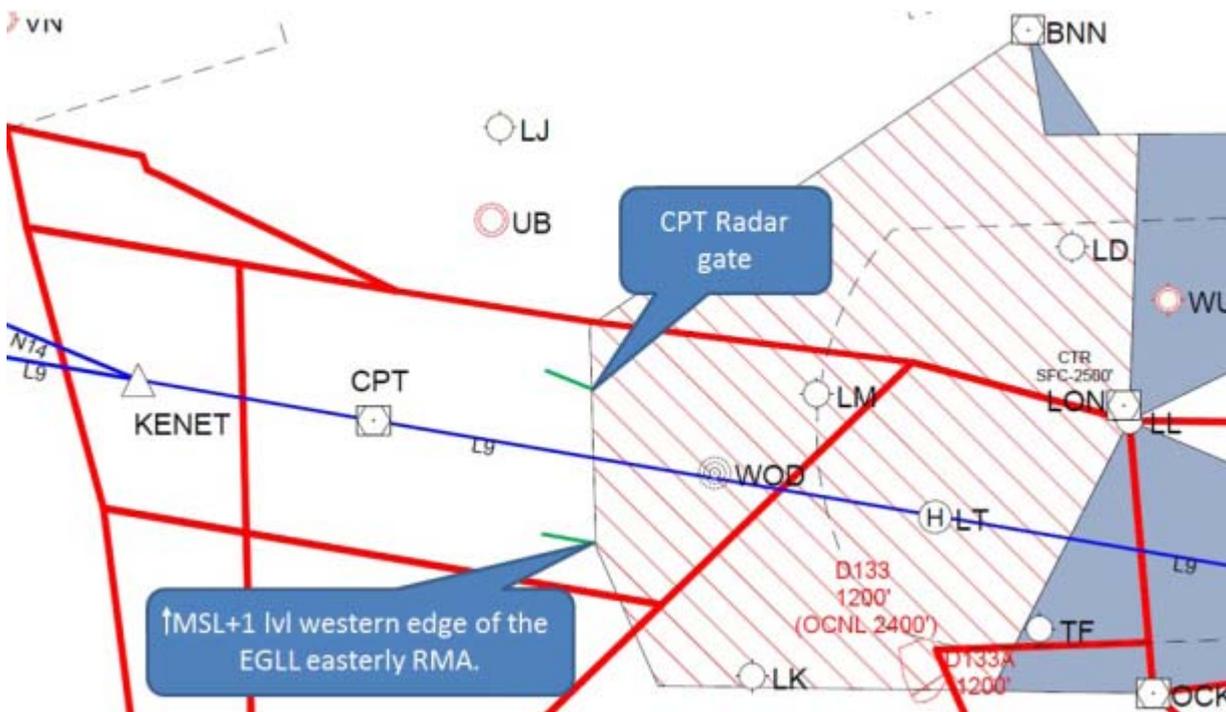
The first element was a change to the **co-ordination requirement** for how one controller missed or used the area of responsibility of another controller if they did not first speak with each other. Originally the Heathrow radar

controllers would not climb Heathrow easterly CPT departures above 6000ft if they were going to **enter** a block of airspace near the OCK Hold called **Area A**, this changed to Heathrow radar controllers would not climb Heathrow easterly CPT departures above 6000ft unless **3nm north** of the northern boundary of **Area A**. Either requirement could be mitigated if the two controllers first spoke to each other directly and agreed a climb above 6,000ft, but a this involves a phone call and time (something radar controllers are always conscious of the lack of); I suspect if at all possible the Heathrow radar controllers just vector to be at least 3nm away from **Area A**.



The second element, and likely more significant, is a change to the high level (around 8,000ft amsl) internal ‘transfer of control’ **standing agreement** from the Heathrow radar controllers to the Terminal Control South controllers. Originally the Heathrow radar controller had to present departures on Heathrow RWY 09L/R CPT departures climbing to Minimum Stack Level + 1,000ft (normally around 8,000ft amsl, but floats up and down based on the prevailing air pressure) and to be on a radar heading in a band between 270° and 310°; this produced the original swathe. It is also important to note that the Heathrow radar controller has to reach Minimum Stack Level + 1,000ft before leaving the RMA.

Whilst the height requirements remained unchanged the band between 270° and 310° gave way to a defined CPT Radar Gate:



This gate is narrower than the original radar heading band. I suspect this has produced the shift in traffic focus north.

I any eventually there was nothing for AR to approve in all this. The RMA is long extant for the purposes of tactical radar vectoring and all the notified procedures remain as is.

I have attached the current TC Tol and Heathrow's swathes (with an approximation of Area A) to help you turn this into a response. I am not sure you can use the pictures as they belong variously to Heathrow and NATS TC.

[REDACTED]

[REDACTED]

Safety and Airspace Regulation Group
Civil Aviation Authority

Tel: [REDACTED]
Mob: [REDACTED]

www.caa.co.uk

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Please consider the environment. Think before printing this email.

Heathrow Easterly CPT Departure Trial continuation

User Group(s): TC South, TC Heathrow,
TC GS Airports, TC GS South

Effective: 13-NOV-14 Effective Time: 00:01
Expiry Date: 29-APR-15 Expiry Time: 23:59

Introduction

OPNOT160.14 LTC : DEP Heathrow Easterly and Westerly RNAV1 SID Trials contains details on the early completion of the DEP Heathrow RNAV1 SID trials.

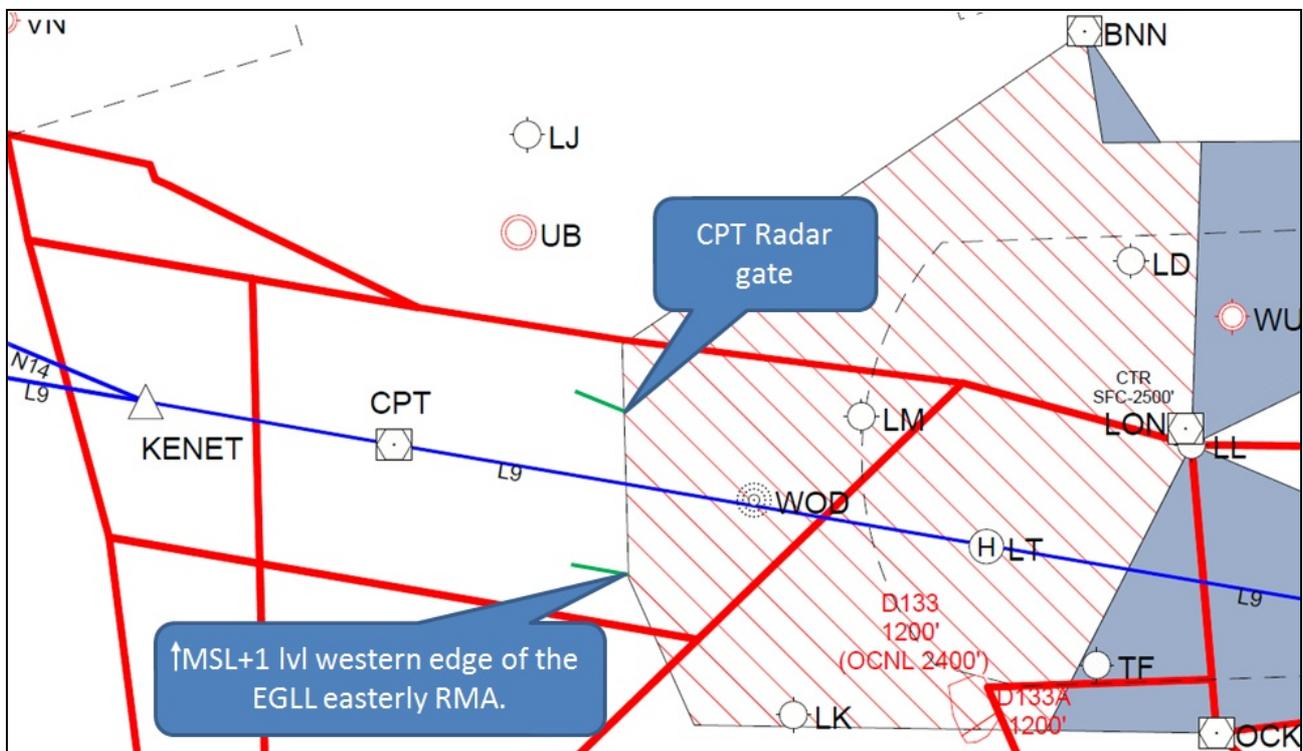
The PIBUG SID is withdrawn on the 13th November 2014 and this TOI details the operation of the standing agreement for Heathrow CPT easterly departures from TC LL INT S to TC SW DEPS at MSL+1 to be level by the western edge of the Heathrow easterly RMA. The CPT radar gate will remain to assist in the presentation of traffic to TC SW DEPS.

Restrictions are placed upon TC Heathrow not to climb above 6000ft unless 3nm north of the northern boundary of Area A. Beyond this restriction, TC SW are responsible for separating arrival aircraft into OCK and Heathrow easterly CPT departures.

The continuation of this aspect of the trial will enable:

- provision of a higher level to TC LL without coordination with TC SW;
- positioning of the departure inside the intermediate / final approach pattern to aid TC SW DEPS' onward presentation to S23.

The CPT Radar gate is between 8.2nm and 9.6nm from CPT at its extremities and these distances can be used as part of a 'level X NM before CPT' instruction. Below is an illustrative diagram of the CPT Radar gate:



TOI071.14 LTC - Heathrow Easterly SID Trial – REVISION is cancelled from 2359 UTC 12th November 2014.

Effective: 13-NOV-14
Expiry Date: 29-APR-15 Expiry Time: 23:59

TOI093/14 LTC
Page 1 of 5

NATS Private (Commercial in Confidence)

Procedure

Times of Operation

The trial procedures shall be available H24.

Conduct of Trial

TC Heathrow

General

LL INT S is required to take control of aircraft following CPT Departures, which conflict with the intermediate or final approach pattern. LL INT S is to climb the aircraft to the agreed level and then transfer control to SW DEPS (or as otherwise directed).

Release Procedure

Prior to the commencement of easterly operations, Heathrow Tower Supervisor will contact GS A and request free flow and heading 220° climbing to altitude 6000ft to be used for CPT departures that day.

Before GS A approves the heading and free flow on CPT Departures, they shall liaise with LL INT S.

Due to the constraints of Heathrow Tower EFPS, the 'Standard Heading' for free flow CPT departure releases shall always be 220°. If this heading is not suitable GS A will not agree to implement the use of the 'Standard Heading,' and CPT departures will be subject to individual co-ordination by AIR Departures with LL INT S, who can issue alternative headings on a tactical basis when requested.

Standing Agreement with TC SW Departures

LL AIR will transfer the aircraft to LL INT S who shall identify, validate and verify the traffic as per MATS Part 1.

LL INT S shall transfer CPT departures to SW DEPS by silent handover subject to the following conditions:

- The aircraft is at or above MSL+1 by the western edge of the Heathrow easterly RMA;
- The aircraft is delivered to SW DEPS on an assigned radar heading, positioned through the CPT Radar gate;
- The allocated heading should, subject to traffic, position the departure towards the northern side of airway L9 but must not track the aircraft into TC North airspace;
- LL INT S shall ensure that the aircraft is at 4000ft or above abeam WOD.

The heading allocated by LL INT S must ensure that a minimum of 3NM separation is maintained from other traffic on intermediate and final approach under the control of LL INT N or LL FIN directors.

LL INT S shall not climb Heathrow easterly CPT departures above 6000ft unless 3nm north of the northern boundary of Area A.

On transfer of communication the traffic is released to SW DEPS for further climb.

SW DEPS shall not vector the aircraft from the assigned heading until:

- The aircraft is at or above MSL + 1;

Or

- The aircraft has passed abeam WOD.

If a departure is unable to meet the terms of this standing agreement: either the level restriction or lateral positioning through the CPT radar gate, LL INT S must coordinate with TC SW DEPS. Where possible, this should take place prior to abeam WOD.

TC SW DEPS is responsible for separation against all traffic outside of the LL RMA.

This constitutes a Standing Agreement between LL INT S and the SW DEPS sector.

Note: ~~LL INT S shall not climb above 6A within Area A without coordinating with SW DEPS.~~ Area A is available to Heathrow controllers on the 'SWSE' NODE Map and the note in the MATS Part 2 is available in Annex A to this TOI.

TC South

Standing Agreements

Outbounds via SW

From	To	Agreement	Aircraft/Conditions
LL INT S	SW DEPS	MSL+1 lvl western edge of ELL easterly RMA	EGLL easterly CPT departures (Notes 6, 7, 19 and 20)

Note 6: If LL INT S is unable to deliver the aircraft through the CPT Radar gate or the departure is unable to make the level restriction, they shall coordinate with TC SW DEPS. TC SW DEPS must coordinate with TC OCK if an aircraft is climbed above 6A within Area A. (See STH 3.3.1).

Note 7: TC SW DEPS shall not alter the assigned heading until the aircraft is at or above MSL+1, or has passed abeam WOD.

Note 19: In very low pressure, when MSL+1 is FL100, consideration should be given to suspending either the Solent outbound and Farnborough clutch outbound standing agreements or the Heathrow CPT Easterly Departure standing agreement.

Note 20: LL INT S will not climb Heathrow easterly CPT departures above 6000ft unless 3nm north of the northern boundary of Area A. However, TC SW DEPs remain responsible for separating arrival aircraft into OCK and Heathrow easterly CPT departures.

NODE Radar Maps

The CPT Radar gate may be displayed on NODE by selecting 'S/MAPS' -> 'CPTGATE'

Departure Separations

All departure separations remain the same as the current MATS Part 2.

Other Trial Procedures

London Para

The introduction of these procedures will not change the existing procedures for the operation on London Para within TC airspace.

Contingencies

The standing agreement between Heathrow and TC South may be suspended or amended as required as with any other standing agreement.

Feedback

Any comments concerning the trial should be entered into the DEP Trial Comments Folder kept on the GS South Desk and GS Airports Desk.

Originator:	DEP
MATS Part 2 Ref(s)	LTC MATS Part 2, Heathrow Section 7.3, South Section 2.3.3 & 3.3.1
Impacted Systems / Documents	NSIS, Radar Maps, Adaptation Change, Network Management , AIP

Annex – LTC MATS Part 2 (Edition 2/14)

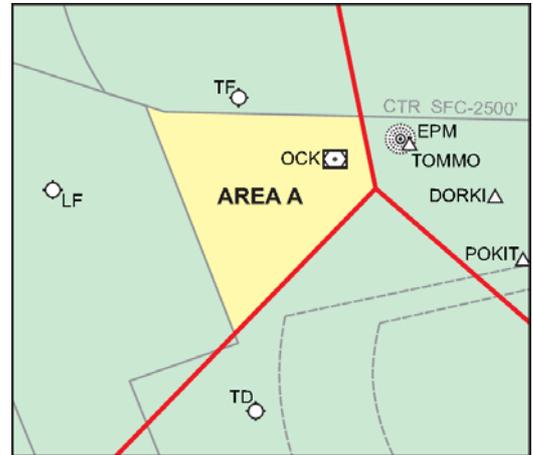
TC Heathrow 7.3.4 & TC SOUTH 3.3.1:

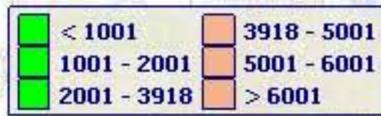
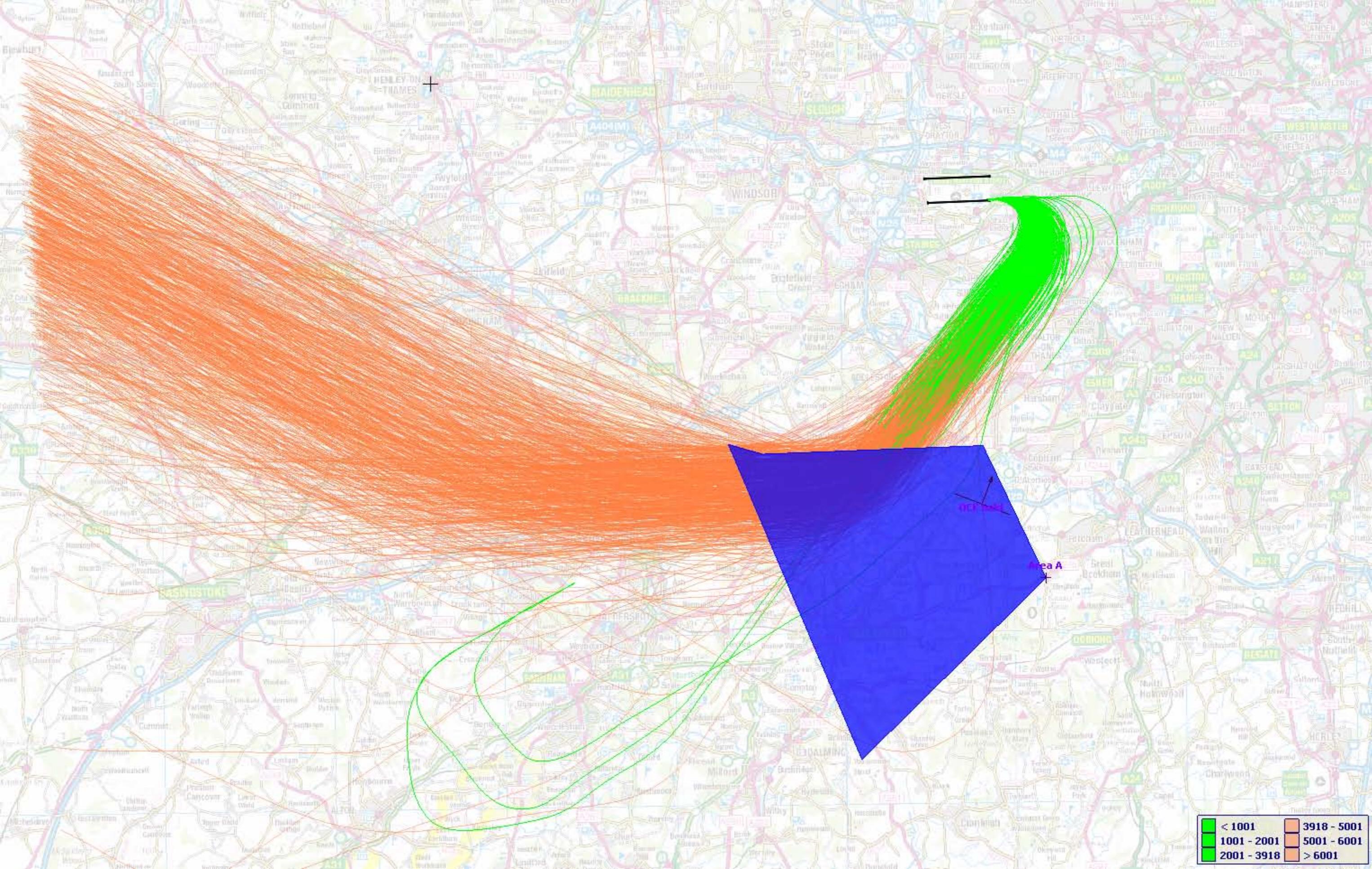
Area A

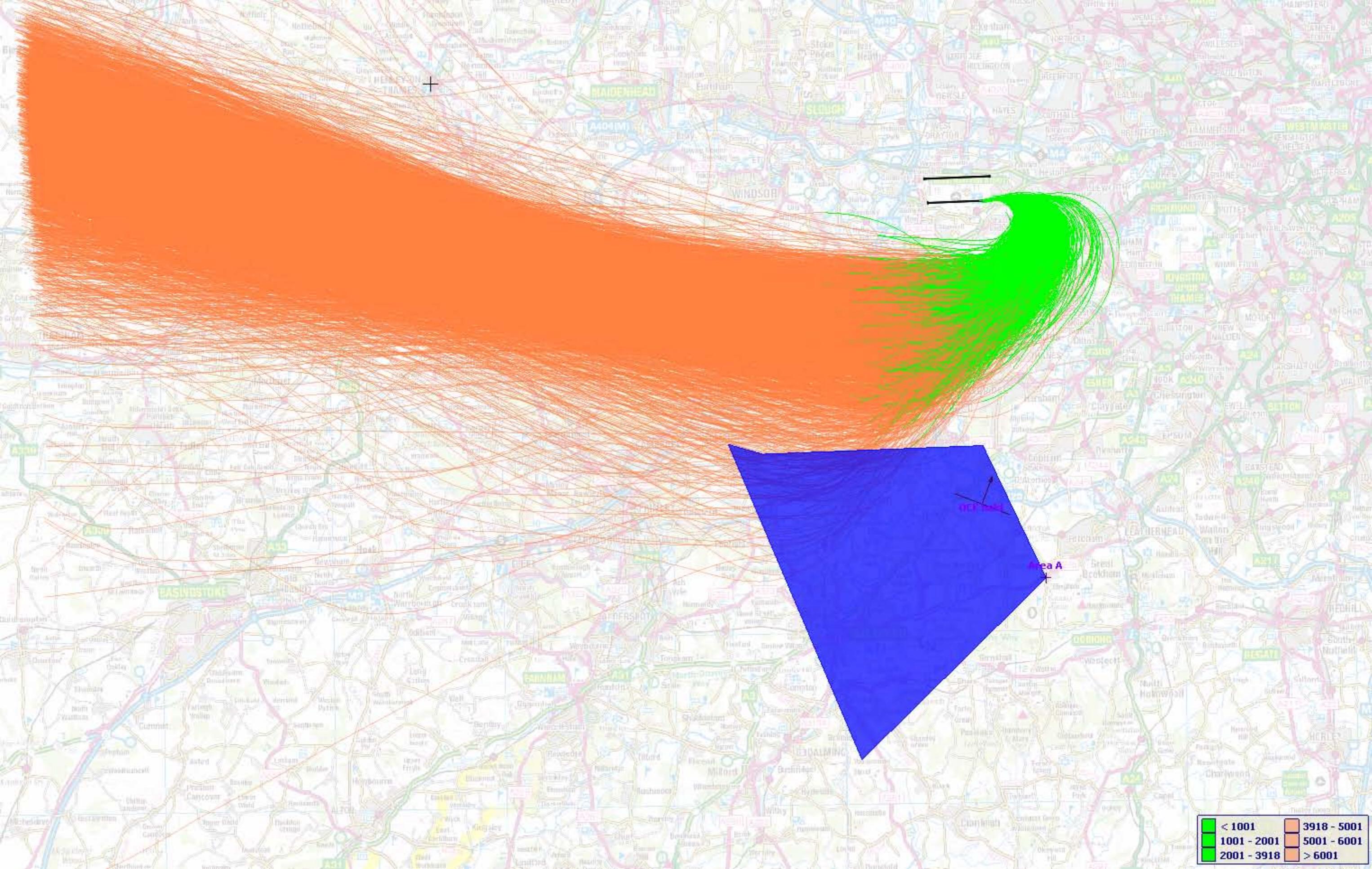
The airspace within Area A is divided vertically as follows:

- Airspace at 6000ft and below within Area A is the responsibility of SW DEPS.
- Airspace at Min Stack Level and above within Area A is the responsibility of OCK.

~~Where LL request climb above 6000ft for an easterly CPT departure, SW DEPS will be responsible for coordinating as necessary with OCK. There is no requirement for LL to avoid Area A unless specifically instructed to do so in the coordination.~~







HERNEY ON THAMES +

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Area A

