



STAKEHOLDER CONSULTATION - FEEDBACK

Issue 1

1. Introduction

From 31st January – 31st March 2014, NATS conducted a consultation soliciting feedback on proposals to designate a volume of airspace in the Scottish FIR as "Route Free Airspace" (RFA). This change will remove all ATS routes from the airspace and will enable aircraft to be able to flight plan and fly direct from point to point.

This document provides feedback to stakeholders who participated in this consultation exercise. This will be sent to all stakeholders who participated in the consultation, and will be published on the Environment/Airspace Developments section of the www.nats.co.uk website.

This document should be read in conjunction with the stakeholder consultation document. All acronyms and technical terms are explained in full in the stakeholder consultation document. For reference the stakeholder consultation document is available from:

<http://www.nats.co.uk/environment/airspace-developments/>

2. Overview of Responses

The Route Free Airspace stakeholder consultation was of 12 weeks duration, commencing on 31st January and closing on 31st March 2014.

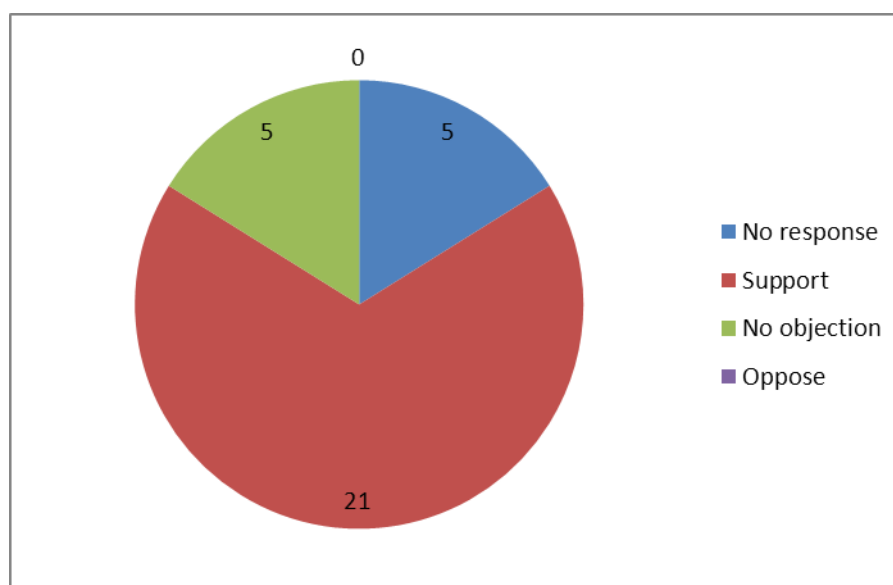


Figure 1. All stakeholder responses pie chart

The stakeholder consultation document was sent to relevant organisations, including selected National Air Traffic Management Advisory Committee (NATMAC) representatives, airline representatives (via the OPA) and the four adjacent air navigation service providers (Avinor, IAA, Isavia, Naviar). The full stakeholder list is given on page 3 of the Route Free Airspace consultation document.

The responses from the consultees are summarised in the pie chart at Figure 1.

The responses categories (support/object/no objection) are summarised in Figure 2. There were 21 responses in support of the proposal (including the OPA contingent). 5 responses indicated no comment or no objection to the proposal.

BAE Systems (Warton) expressed concern that the introduction of Route Free Airspace would impact their ability to conduct testing sorties. NATS is working with BAE Systems to accommodate their needs within the RFA environment, specifically a number of "Special Use Areas" of airspace have been proposed, within which BAE Systems can conduct test sorties safely.

MOD DAATM supported the proposal with caveats provided their operations in non-segregated airspace could still be accommodated. See section 2.1 below.

There were no responses which opposed the proposals.

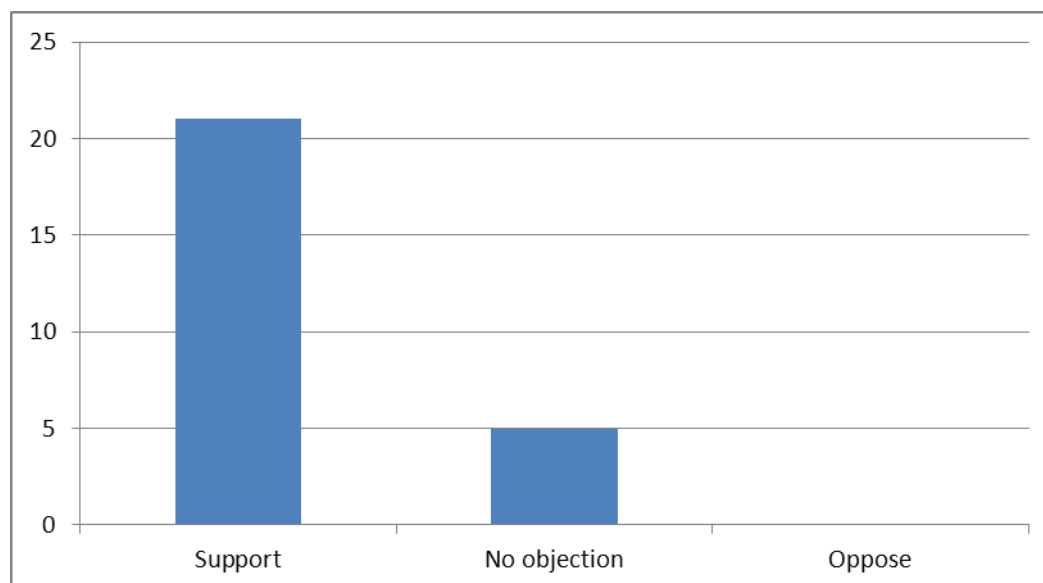


Figure 2. Response categories

2.1 Key themes arising from consultation

MOD and BAE Systems, Special use Airspace (SUA)

Currently both the MOD and BAE Systems utilise the non-segregated areas of airspace above FL255 to undertake training and testing sorties under ATS or tactical services.

Within Route Free Airspace consideration will have to be given to these sorties, plus routine transits. Currently military controllers take advantage of the 'space' between the published airways and conduct activity within this airspace in the knowledge that commercial aircraft would be unlikely to affect their operation; and those aircraft that would be affected could be coordinated.

Within the proposed RFA, the areas where this practice will be feasible would be less obvious. NATS has proposed the use of areas of designated Special Use Airspace (SUA). These could be provided within which activity could take place, and would still enable other traffic to cross subject to coordination with the designated user of the SUA. The SUA could be in the form of Variable Profile Areas (VPA) (European preference) or Dynamic Mobile Area (DMA) and would be activated within an agreed pre-notification time.

Rogue Aircraft

MOD commented that "the onus should be on NATS in RFA to identify rogue aircraft and advise ASACS accordingly. As the Air Defence community will not have the same level of confidence in or access to an aircraft's routing."

With the introduction of RFA the actual flight trajectory will be much closer to the flight planned route than is the case today, and the access (by the military) to the flight plan information will be unchanged.

Airline Flight Planning issues

D701 – how often is it active so how often will DCTs be available?

The expanded D701 complex (currently the subject of the separate Hebrides Range ACP by Qinetiq) sits largely within the proposed RFA Phase 1 area. Airline stakeholders questioned how often this would impact RFA operations. NATS have been given assurance from Qinetiq that the Range will not be used any more than it currently is. This is being built into the Letter of Agreement for the management of the Hebrides Range. Statistical data indicates that over the last 3 years D701 activity has closed Oceanic/NOTA Entry/Exit points around 32 days per year. As part of the proposed Hebrides Range design and operating procedures NATS are working closely with Qinetiq to try to minimise further the impact of their activity on civil operations.

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Changes made as a result of consultation

The purpose of consultation is to identify issues which may not have come to light previously. The following changes to the design/clarifications have been made as a result of feedback from consultation.

- Special Use Areas (SUAs) for use by the MOD and BAE Systems (Warton) in the Irish sea are under consideration, and if required will be detailed in the amended LoA. These would be reserved when required, for operational, training and flight testing sorties.
- Confirmation: that oceanic landfall fixes will not be removed as part of Route Free Phase 1. However they may be removed as part of the introduction of Reduced Lateral Separation in Oceanic airspace.
- Clarification: the SRD will not contain every possible permutation of fix combinations. Rather it will list the sensible and usual combinations. Less usual route possibilities may still be permissible, even if not listed in the SRD. At the request of some airlines NATS has committed to involve airlines when the details of the route permutations are being drafted.

4. Further correspondence & feedback

In the event that a representative organisation wishes to present **new** evidence or data to the Director of Airspace Policy, for consideration prior to making his regulatory decision regarding this proposal, the representative organisation must submit, in writing, the information to the following address:

The Director (Route Free Airspace ACP)
 Directorate of Airspace Policy
 CAA House
 45-59 Kingsway
 London WC2B 6TE