

# Terminal Control North Airspace Change Proposal

Deadline 22 May 2008

## What is it?

This section of the website deals with a major Airspace Change Proposal in the north London TMA. The change itself is necessary and we recommend you accept it. However it is now clear that whilst NATS have set out all the increases in CAS they need to implement this, they have not given up airspace they can do without. Of course, NATS is a commercial company and has no public remit to minimize the airspace used for commercial purposes but Director Airspace Policy, who will consider this application, certainly does. He will look at this carefully on the basis of the documents presented to him so if you want to influence this you have to respond. The more responses the more impact we will have.

First, let's look at the change from the viewpoint of ATC and commercial operators and pilots. The growth of Luton, Stansted and City have resulted in really complicated procedures as the various inbound and outbound routes are interwoven with each other and with Heathrow traffic. Although growth has eased, the north London TMA is a mess and needs to be sorted out. NATS have been working on this for some time to try to unravel and simplify the procedures and this ACP is the result. Currently, there are 2 holds for Luton and Stansted, one between Luton and Stansted at LOREL and one to the east at ABBOT. The plan is to have 3 holds spread across the north and one near Clacton for City, each with routes to the runways. If you right click [this link](#) and select Open in a New Window, you will be able to see the arrangement. We are satisfied that this is the sensible way to go and in our opinion we should support it. The holds are at GENLO, BASDO and OLMIT to the north and ROVOK to the east with green lines showing the route from the holds to the runways.

## The Airspace Change

Let us now look at the airspace changes that results from this plan. The LAA and BGA met with NATS and the CAA on 4 April and went through each hold and route, looking at the airspace that NATS said was needed. All aircraft are now required to follow a continuous descent approach (CDA) that follows a 3 degree descent path to reduce noise nuisance and to save fuel. That is about 310 ft per NM which we can plot that back from the runways along the green lines to the holds which are at a minimum of FL 70. This yielded interesting results:

- Not all the airspace around the holds is needed for protection.
- Because of current complexity, routes cross over and quite a lot of vertical airspace is needed for separation but under the new plan, this is not always necessary.
- Some of the lower level CAS is not now needed and the boundaries can be pulled back.

It quickly became clear that whilst NATS had identified all the increases in airspace that the plan needs, they did not appear to have applied a rigorous test to the airspace as a whole with a view to releasing what is not essential. Now NATS is a commercial business which has to maximise its return on capital to shareholders so we can understand their policy on retaining important resources. We have now challenged them on this and want NATS to release all non-essential airspace. However, they have not responded to our emails since the 4 April meeting perhaps suggesting that they are vulnerable on this.

We recommend that although you may support the proposal, you do not support the airspace change until these matters are dealt with.

## The Response

Please respond to NATS on this consultation. To use their online response form you have to register. There is a "send your comments" link on the [NATS Website](#). You need to sign up, receive a password and then log in.

We recommend you tick the following boxes:

- I do not support NATS' proposals
- Changes to controlled airspace boundaries
- Safety considerations
- Other (please specify within comment box)

We strongly recommend you compose your comments in another document and then paste them into the box on the comments form (up to 2500 words only) otherwise you will not have a record. Note that you can only submit the form once and if you leave the page whilst you are composing, all your work will be lost.

Please draw on the following issues but using your own words:

You may want to start by stating the reason for your interest in this and pointing out that your comments are not restricted to the "TCN Area" that you had to select on the comments form but NATS did not give suitable options for aviation stakeholders.

- Where substantial class G airspace is taken for CAS, there should always be a review to attempt to return unnecessary CAS to class G.
- NATS have not attempted to return substantial portions of CAS to Class G even though there appears to be no compelling case for its retention.
- Not all the airspace around holds is necessary for protection (New areas 7 and 6).
- Your representatives have not been able to follow-up detailed discussions as NATS have not returned or acknowledged emails.

- The extension of CAS to the North of London will remove class G airspace currently used by non-commercial flying operations and restrict users to smaller areas.
- Although this change simplifies airspace from the commercial user's viewpoint, it increases complexity when viewed from the Class G user viewpoint. This will inevitably lead to an increase in incursions which could be resolved by reducing the amount of CAS used.
- Returning non-essential airspace to class G, removing choke points and simplifying GA routings are all things which could have been done as part of this change. This must be included before approval.
- The introduction of CDAs should raise traffic profiles between the new holds and the airports so any CAS with a base more than 500ft below this profile should be considered for return to class G.
- In particular the introduction of CDA to Stansted runway 05 and the longer straight in approach should be a cause to release airspace in this difficult choke area. This is an opportunity to simplify the Bishops Stortford airspace corner, reducing incursion risk.
- The 2000 ft base CTA strip to the south of Stansted does not seem to be needed now that all traffic will be routed north of the airfield. It should be released.
- The 2500 ft base CTA triangle to the south of Stansted does not appear to be used in the new airspace design.
- There appears to be no overwhelming case to retain some of the lower level CAS to the south and east of Stansted and in the Chelmsford, Colchester area
- New Area 1 is not necessary as traffic can be routed to avoid it and anyway should not be below 5000 ft in that area. Its shape is too complex and is it is only required as a contingency, it should be deleted.
- New area 2 does not need to extend so far north east as traffic should not be below 6900 ft at its outer boundary.
- Aircraft leaving the new holds at FL70 and descending on a CDA will be well above the current lower levels of CAS. The CAS levels should be raised or the boundaries moved to compensate.
- This should be part of a broader review of low level airspace around the London TMA to try to return underutilised CAS to class G

If you want to write with your response the address is:

TCN Consultation,  
NATS,  
Freepost NAT22750,  
Reading,  
RG1 4BR

Don't forget the deadline is **22 May 2008**. Please respond and get all your friends to join in as well.