



Stakeholder Second Consultation

Airway Q41 - Proposal to reclassify below FL75



1. Introduction

Following the consultation in 2014 on a proposal to change the classification of part of airway Q41 to Class D below FL80, sponsorship of this Airspace Change Proposal has transferred from the General Aviation Alliance to the FAS VFR Implementation Group (FASVIG), which has the resources necessary to deliver this airspace safety improvement.

Following the first consultation, there was widespread support for the proposed change. However, practical difficulties in operating this airway as Class D were raised by NATS. A feedback report from the first phase of the consultation can be found on the FASVIG website www.fasvig.org

Following advice from the CAA, other options were considered and discussed with NATS, ANSPs and some commercial stakeholders. As a result of this activity FASVIG decided to amend the proposal and reconsult key stakeholders. FASVIG now proposes that the base level of parts of Airway Q41 be raised to FL75, and releasing the airspace below to Class G.

2. Background to the Revised Proposal

The section of airway Q41 extending from the Solent CTA to ORTAC, from flight level 35 upwards, encompasses the major route from the mainland to the Channel Islands. It is Class A Airspace. At the northern end it abuts the Class D Solent CTA 8 which extends from 3500 ft up to 5500 ft. At the southern boundary it abuts the Channel Islands CTR (class D airspace) which extends from surface to FL80. Although they form the vast majority of traffic on this route, VFR aircraft and IFR aircraft where the pilot holds a restricted instrument rating are not permitted to fly in this Class A airspace.

This proposal seeks to improve safety for aircraft flying VFR between the UK and the Channel Islands and France by providing access to airspace which is significantly under-utilised. Presently, aircraft using the route between NEDUL and ORTAC and which are not able to fly in Class A airspace must remain below FL35 or route outside the lateral boundaries of Airway Q41. However, Airway Q41 is bounded by danger areas D036 to the east and D031, D026 and D023 to the west. Flight by single-engine aircraft at low levels over the sea carries unnecessary risk to the occupants; planning an international flight through or close to danger areas which may be active is not best practice and may also carry unnecessary risk.

The lower levels of Q41 have been little used by commercial traffic for years. Usage is reducing further as Aurigny Airlines reequips with a modern aircraft fleet. But the otherwise empty Class A airway is not accessible by the GA aircraft which are the main users of this route. The current options for the great majority of GA aircraft will therefore be either to remain below flight level 35 under Q41 until within the Channel Islands CTR or to fly at a greater altitude, up to flight level 105 below airway L980, but then to navigate through the small 2.8 NM gap between Q41 and danger area D036. Both options pose additional risks, the former necessitating a long low-level transit over the sea, the latter the possibility of infringement of Q41 or D036. The "FL35 ceiling" on VFR flights at the FIR boundary also presents a collision

risk with opposite direction traffic constrained close to the same point and the same maximum level but with all pilots seeking to remain as high as possible in case of engine malfunction.

3. Safety

Particularly for the single-engine aircraft, the presence of Class A airspace down to FL35 is a significant safety hazard. Following an engine malfunction a typical light aircraft would have a glide speed of some 75kts and a glide angle of approximately 1:7. Immediate actions to recover power, a distress call and preparation for ditching would need to be complete by some 1000 ft when the pilot would need to concentrate on a successful ditching.

Over the sea when flying at 3000ft, the useful time available for immediate actions and preparation for ditching before reaching 1000ft would be some 1 minutes 50 seconds. With the base of Class A airspace raised to FL75 the useful time following engine malfunction at 7000 ft would be in the order of 5 minutes 30 seconds; a significant increase in available time and glide range. Coupled with the increase in RTF and radar coverage the increased time and range would represent significant safety enhancements.

4. Proposed Airspace Change

The initial proposal offered four options and proposed that airway Q41 should be reclassified to Class D airspace up to flight level 80 from ORTAC to the northern boundary of Solent CTA-5. However, largely as a consequence of the feedback from NATS, it is now proposed that the base of Q41 should be raised to FL75 over a smaller area with matching adjustments to the Solent CTA where it overlays. The airspace so released would be Class G which is accessible to VFR aircraft.

The airspace is depicted in graphics attached at Annex A which should be cross-referenced to the text below.

FASVIG proposes that airspace in this area is changed as follows:

- South of ORTAC the Channel Islands CTR is Class D below FL80. No change is needed for VFR access.
- Between ORTAC and the southern boundary of Solent CTA-8 it is proposed that the base of Airway Q-41 is raised to FL75.
- North of the Solent CTA-8 boundary (co-incident with waypoint THRED) the present base of Q41 rises to 5500ft to pass over CTA-8 which has a base of 3500ft. VFR aircraft are constrained below 5500ft but can fly within the Solent Class D airspace. It is proposed that the base of Q41 is raised to FL75 where it passes over CTA-8, the upper level of which is raised to FL75 to provide contiguous controlled airspace.

The base of the main oversea area of Q41 would be raised to release underused CAS to Class G. That part of Q41 that overlays CTA-6 would become Class D, part of Solent airspace. The lateral dimensions of airspace would be unchanged.

These changes would deliver improved safety for VFR aircraft over the main sea crossing between the UK and the Channel Islands and France and additionally permit similar safe operations for IFR aircraft where the pilot holds a UK restricted instrument rating. It would have minimal impact on commercial IFR operations.

5. Control Arrangements

Current air traffic control arrangements for this lightly used airway are complex involving three different agencies – Swanwick LAC (sector 21), Swanwick LTC (TC SW DEPS) and Southampton ATS (Solent radar). Feedback from NATS highlights the difficulties that would be encountered with the previous suggestion of reclassification to Class D airspace. IFR traffic on this route is so light that it does not justify its own sector for control and the work is shared by other sector controllers who are not trained to manage VFR traffic. VFR flight plans are not processed by NATS TC nor made available at controller workstations. They are only available to FIS officers. Whilst these matters could be addressed the costs would be significant. The option to release the lower levels of the airway to Class G is simpler and more appropriate, given the low and reducing commercial usage of the airspace.

Reclassification of the lower levels to Class G airspace would remove all the control difficulties for NATS. Solent radar would retain control of a slightly expanded Solent airspace. Within the newly created Class G airspace, radar services could be provided by Bournemouth ATC which already provide a service to traffic flying adjacent to the western side of Airway Q41. Bournemouth radar is capable of tracking traffic at least as far as ORTAC. In addition Plymouth radar provides a LARS service in this area during its notified hours. Jersey Radar is able to track aircraft well north of the FIR boundary at ORTAC. Southbound traffic would need to transfer control to Channel Islands (CI) ATC at or before the boundary with the CI CTR and northbound traffic will need to transfer to Solent prior to the boundary with Solent CTA 8. In both cases clearance would be needed.

It is of note that aircraft using the route between Solent and ORTAC would cross the FIR boundary and must therefore file a flight plan which would be available to these ATS units.

6. Consultation Arrangements

In accordance with the guidance in CAP725 the initial consultation was addressed to all aviation stakeholders but the CAA has agreed that for this second consultation a limited distribution to include relevant ANSPs, airports and Commercial Air Transport operators would suffice. Nonetheless FASVIG will make this consultation available on its website and inform all previously consulted organisations and individuals about the revised proposal.

The CAA guidance is that this proposed change does not require consultation with environmental stakeholders since it is limited to a change in the classification of the

airspace which would allow aircraft which are presently constrained to fly at low level to fly higher, reducing environmental impact. Furthermore, the majority of the airspace is over the sea.

Impact of the Proposal

The proposed change in classification will have no impact on other airspace users either in terms of safety or operational procedures. VFR traffic within the released airspace is expected to increase by up to 26 flights per day at peak periods with a concomitant decrease in VFR traffic in the adjacent Class G airspace.

The proposed change would be implemented at a suitable date and require an amendment to the UK AIP and associated charts as well as a transfer of ATS responsibilities from NATS to Solent ATS for an extended CTA-8 and an increase in utilisation of radar services for Plymouth Military and/or Bournemouth ATS. NATS would be relieved of responsibility for this low level and low utilisation Class A airspace.

Safety of flight between the UK mainland and Channel Islands would be improved significantly.

Environmental Considerations

Overview. Following a review during Phase 1 of the ACP process it was agreed that no environmental consultation would be undertaken as examination of the impacts of the proposal suggest that they would all be beneficial.

Noise. The section of airway Q41 under consideration lies almost entirely over the sea. The proposal would see aircraft will be operating at higher altitudes than presently. The proposals will reduce noise at surface level, although the current impact is already minimal. A very small part of Solent CTA 8 lies over land, but as aircraft would be operating at a greater altitude than at present any current environmental impact would be reduced.

Climate Change. Aero-engines will function more efficiently at a greater altitude. Thus, allowing GA aircraft access to greater altitudes will reduce carbon dioxide emissions. A reduction in the number of aircraft using a longer route to avoid Airway Q41 will reduce fuel burn and reduce climate impact.

Visual Impact and Tranquillity. The section of airway Q41 under consideration lies almost entirely over the sea. Aircraft will be operating at greater altitude. Any impact on visibility or tranquillity is currently minimal and would be reduced further by the proposed change.

Air Quality. Aero-engines will function more efficiently at a greater altitude. Thus, allowing GA aircraft access to greater altitudes will reduce carbon dioxide and particulate emissions.

Summary

Safety of flight for aircraft flying VFR between the UK and the Channel Islands would be increased by raising the lower limit of Airway Q41 to FL75 so as to align as far as possible with the reclassified CI CTR to the south and the northern boundary of the Solent CTA-8 to the north. Existing control arrangements will need to change and affect NATS (NERL), Solent Radar, Bournemouth ATS and Plymouth Military. If the proposal is subsequently approved by the CAA, the change will be implemented at an appropriate AIRAC Cycle opportunity.

Period of Consultation

The limited second consultation on this revised proposal will commence on Monday 1 August 2016 and close at 2359Z on Sunday 14 August (2 weeks).

How to Respond

Please send any comments on the airspace change proposal to:

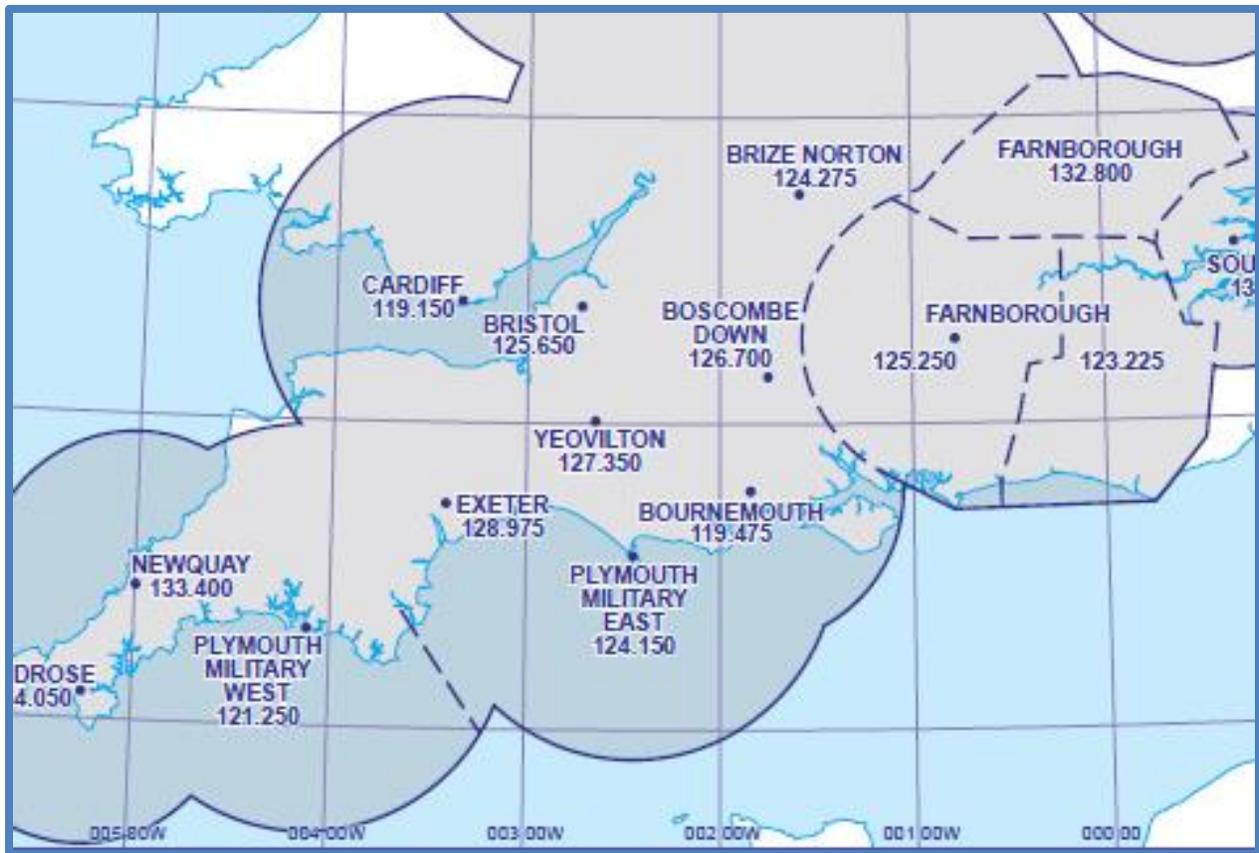
Airway Q41 Consultation Co-ordinator at consultation@fasvig.org

Or by post to:

Airway Q41 Consultation Co-ordinator
FASVIG Limited
31 Walker Avenue
Wolverton Mill East
Milton Keynes
Buckinghamshire
MK12 5TW

Annexes:

- A. Graphics and Charts
- B. List of Consultees





Annex B

Organisations/individuals consulted on proposed airspace change:

Airspace Users

NATS PLC
Southampton International Airport Ltd
Bournemouth Airport Ltd
GM ATS Unit Southampton
GM ATS Unit Bournemouth
MOD (DAATM)
Director of Civil Aviation, Jersey
Jersey Airport Head of ATC
Aurigny Air Services Ltd (DFO)
Flybe (DFO)
Eastern Airways (DFO)
Jersey Aero Club
Guernsey Aero Club
AOPA Channel Islands Region
AOPA UK
GASCo
GAA

Information

CAA (SARG)