



Title: Airspace Consultation Final Feedback Report

Subject: Airway Q41 ACP

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1. Introduction and General Information

1.1 Having determined that the lower levels of Airway Q41 were underutilised, FASVIG consulted twice on proposals to make Airway Q41 accessible to VFR aircraft and aircraft which are unable to fly IFR in Class A airspace. There was widespread support for the proposals but technical difficulties were identified. The first consultation proposed reclassification to Class D to enable airspace sharing by all airspace users but objections from NATS made that untenable. The second consultation proposed to change Airway to Class G below FL75 but in addition to further objections from NATS there were specific climb and descent issues for Aurigny aircraft using Alderney. It was decided to split off a proposal using the Release of Controlled and Segregated Airspace (RCSA) procedure to change Q41 to Class G below FL55 as that is commonly agreed. That would achieve part of the safety improvement envisaged by doubling the time available to single engine aircraft following an engine failure; it would be proposed for implementation by March 2017.

1.2 Policy changes to allow airspace sharing would be brought forward and potential options for higher levels would be developed in due course following the full CAP725 Airspace Change Procedure.

2. Overview of Comments Consultation 1

2.1 Consultation 1 considered 4 options of which Option D was preferred as it would provide VFR and full IFR access without any impact on commercial operations:

Option A – Do Nothing.

Option B – reclassify Q41 to Class G airspace up to FL80

Option C - reclassify Q41 to Class C up to Flight Level 80

Option D - reclassify Q41 to Class D up to Flight Level 80

There were 180 responses to the consultation:

159 responses from individual airspace users supported change and agreed that Option D was preferable.

The response from MOD supported the change

15 responses from GA organisations and GA operators supported the change

No airlines or airports responded to the consultation

NATS recognised the issues FASVIG sought to mitigate but detailed a number of difficulties related to control arrangements.

2.2 The initial consultation proposal had addressed Q41 from ORTAC to the overhead of Southampton. It was clear that the benefit arose from changing the airspace over the sea but control arrangements north of NEDUL would be complex.



Therefore further consideration was limited to the route between ORTAC and NEDUL only.

2.3 NATS raised the fundamental issue that NERL would not control areas of Class D airspace even though control of such airspace is included in its licence. NATS (NERL) had configured its control arrangements so that only IFR flight plans were available to controllers who were anyway not trained to manage VFR traffic. Given that only traffic that could use this airspace would always be operating along it to a flight plan and that VFR crossing would be most unlikely and could be excluded by regulation, the training requirement seemed minimal. However the NATS position was supported by the CAA. There were no other ATS units funded to manage airways in this area so changing the airspace to a Class D airway was presently untenable. Nevertheless, Class D airspace is the only classification that permits simultaneous airspace sharing whilst meeting the needs of IFR commercial traffic and VFR and IFR GA and such a facility is becoming increasingly important in the congested south of England. This segregation of airspace users is not aligned with the principles of the FAS. Noting that control of Class D is already part of the NERL licence conditions, FASVIG will pursue it separately with the CAA.

2.4 The only remaining way to modernise this airspace to achieve an increase in safety in the short term was to take the sub-optimal option of changing the classification to Class G. FASVIG recognised that this would have an impact on commercial operations but moved to a second round of consultation to identify those.

3. Overview of Comments Consultation 2

3.1 Responses from individual airspace users and organisations in consultation 1 indicated no objections to any of the change options so FASVIG focussed its second consultation on commercial operators and ANSPs who might be affected. Responses were received from:

- NATS
- SIA
- Alderney
- Guernsey
- Jersey
- Bournemouth
- DAATM
- Flybe
- Aurigny
- GATCO
- and 2 individuals

3.2 Whilst respondents recognised that changing the lower levels of Q41 to Class G was acceptable there were objections to the proposed new base level because of climb and descent limitations at the boundary with Solent. FASVIG had taken great care to propose a base level that would be compatible with climb and descent gradients noting that the northern limit of its proposed base of FL75 at THRED was 30nm from threshold of Southampton runway 02. That would provide ample room for a direct climb or straight in approach as the profile is below 3 degrees. FASVIG



concluded that objections based on a requirement for new extended routing with additional significant cost and environmental impacts were not well founded. This was confirmed by the standard clearance given to inbound aircraft today by the Hurn Sector of "expect FL110 at THRED".

3.3 There was however a valid climb and descent issue at ORTAC for Aurigny aircraft using Alderney Airport. Because the new Aurigny fleet of Do228 aircraft are unpressurised, climb and descent needs to be limited for passenger comfort and although Aurigny could manage with a Q41 base of FL55 at ORTAC, FL75 would only be achievable with significant extended routing. FASVIG considered a step of Class D airspace north from ORTAC to facilitate this but the earlier objections raised by NATS made that problematic.

4. Analysis

4.1 FASVIG considered the conflict between the airspace needs of commercial aviation and GA, both VFR and IFR. It remains clear that the airspace use in this area demands Class D (or perhaps C) airspace for maximum efficiency and safety but the UK FIR is presently not configured to provide it. The Aurigny requirement at ORTAC can only be met by Class A airspace at FL55 and above but that would limit the safety gain for GA aircraft. However whilst a change of the base of Q41 from FL35 to FL55 could provide an increase in GA safety in time for Summer 2017, any other course would take at least another year.

5. Revised Proposal

5.1 FASVIG decided to run a proposal to change the base of Q41 to FL55 using the Release of Controlled and Segregated Airspace process. It would seek confirmation from the commercial operators and ANSPs that this is supported and deliver a proposal to the CAA in time to meet the chart update deadline of 7 Nov 16 for chart issue on 2 March 17.

5.2 FASVIG would then consider how to take forward a mechanism for effective lower airspace sharing in the UK as part of a continued Q41 ACP.

6. Limited Consultation on RCSA Proposal

6.1 During the first round, the overwhelming majority of respondents were content with raising the base of Q41 to FL75. Those who replied to the re-consultation were content with the RCSA proposal for FL55 which will be submitted to the CAA on 28 October.

FASVIG

25 October 2017