

**FASVIG 4 Minutes
Break-Out Session Feedback
16th September 2014**

All Break-Out Session Feedback presented in **red** below immediately following each Change Item.

Packages of Change in Detail

This Appendix suggests how the 'packages of change' could be developed in detail, based on the methodology described in chapter 3. It contains an initial assessment of current situation and sets out an indicative plan for drawing on combinations of new capabilities to enable operational improvements in each of the packages.

While set out in some detail, it should be viewed as 'indicative' and a 'work in progress' illustration of how the VFR Deployment Plan might be constructed. In particular, it is based on analysis that primarily reflects the needs of VFR operations by civil and military aircraft and requires further development to incorporate the requirements of CAT and other IFR users.

A.1 Modernising Airspace Structures

A.1.1 Critical Areas for VFR

Within the UK FIR there are areas that are critical to VFR flight, either because they provide the conditions needed for air sports, some to World Championship standard, or they are essential for military or civil training or provide VFR routes joining or around centres of population and the more open areas of the FIR. They connect airfields used for VFR operations and provide international VFR connectivity. These areas are mainly over the UK landmass including the inshore waters and islands with connections to Ireland and the near continent.

Presently there is no categorisation of these areas and when an increase in CAS is proposed, they have no particular recognised value; they are considered to an available resource for commercial development. In this regard the airspace change process does not have the safeguards provided for land planning such as the Significant Areas for Sport recognised by Sport England and by the sport governing bodies of Wales, Scotland and Northern Ireland. That is not to say that the recognition of such areas is sacrosanct but that their proper value would be recognised in national airspace decision making. FASVIG would then need to identify and propose areas for inclusion.

There are 2 elements to this package:

To properly protect Critical Areas for VFR operations for the future a published process for definition of areas and connection to the Airspace Change Process would be developed. By this means alone, the VFR community would become engaged and constructive in future considerations of ACP proposals as it could be demonstrated that the change process would take them into account.

To ensure that critical areas are safe and efficient for VFR traffic today they would be reviewed and proposals for change made in alignment with these overarching ATM principles.

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Airspace & Procedures

Identify critical areas for VFR

Military already does so (AIAA).

GA community to identify similar. How?

GPS data (internet uploads)

Radar traces? 7000 squawks

GA community – Who? – LAA/BGA/BMAA – Regional consultation.

Members of GA alliance on a regional basis?

Low-level transit corridors (e.g. EDIN-GLA)

Regulatory & Government Policy

Legal protection ? Or understanding?

Action: Paper on possibility of having legal status for VFR Critical Areas.

Information Management and Communications.

Safety

Positive for safety.

A.1.2 Terminal Airspace Structures Generally

The nature of terminal airspace structures varies significantly across the FIR. Whilst London airport airspace is compact and heavily used, some other, mainly regional airports have significantly larger CAS for their traffic volume and much of that is under-utilised. Moreover the basis upon which recent areas of controlled airspace expansion have been granted have now proved to be questionable in hindsight so a review conducted under the auspices of the FAS VFR Implementation Plan would present an opportunity to rectify these. At the same time, anecdotal evidence suggests that VFR access to some under-utilised airspace is difficult and is likely to become more so with the introduction of SERA. It is perverse that it is easier to get a VFR or SVFR clearance through the Heathrow CTR than it is through that of many quiet regional airports. Heathrow has the incentive borne of its national hub status but some other airports see VFR traffic as a nuisance. There is no effective regulatory requirement to redress this imbalance.

Terminal airspace should be necessary and sufficient for its task, and in the light of PBN development could include VFR operations as part of its core traffic consideration, particularly where the base and extent of controlled airspaces could be optimised. Funding arrangements identified as part of SESAR Deployment means that from 2015, such reviews, if aligned with PBN development are eligible up to 50%.

FASVIG 4 Break-Out Session Feedback**Airspace & Procedures**

Proper review of CAT traffic densities, e.g. Doncaster. Norwich, etc.. Do they deserve their Class D?
 Method for CAA to de-classify airspace if reality use does not match projected use.
 Bucket & Spade Class D. If quiet. Turn it off.

Proper review of airspace designated for cross-runway use when cross-runway use is discontinued.
 ACTION: FASVIG Chair to write to CAA to ask who in CAA is responsible for ensuring release of airspace no longer required.

Regulatory & Government Policy

SERA – High immediate risk, essential to be addressed.

ACTION: CAA to provide detailed impact analysis paper and propose regulation to mitigate

Airspace Review Process Regulation? E.g. Danger Area Review Group, MATZ?

ACTION: Review of ACP CAP725.

ACTION: Review of transparency of continued requirement for controlled/restricted airspace.

Separation & Deeming – ‘Gold Plating’ VFR Separation in Class D

ACTION: CAA paper current position, drivers and appropriateness.

Information Management and Communications.**Safety****A.1.3 LAMP and NTCA**

The development of airspace for the London airports (LAMP) is proceeding without obvious integration of the needs of VFR operations in the South-East which are likely to be affected significantly by it. In FAS terms, although this is a significant and essential project it is at risk of being unbalanced in that VFR activities which could be accommodated will be excluded purely because they have not been considered at the planning stage. Input on considerations from VFR

operators is presently not invited until after the point where airspace design can be changed; the design risks being a fait accompli.

The LAMP programme needs to demonstrate that it has sought and considered advice on aspects of airspace design and procedures that could impact VFR operations in all classes of airspace. By this means it can achieve support from the other users of the airspace in the South-East of England.

Although at a later timescale, similar considerations apply to the NTCA programme and should be implemented from the outset.

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Airspace & Procedures

As per A1.1. Priority item for coordinated input from GAA London region.

Regulatory & Government Policy

Information Management and Communications.

Safety

A.1.4 Design Rules for Terminal Airspace

Presently, the design rules for terminal airspace include elements which are no longer relevant to modern air operations; for example CAS must encompass all procedures, even when they are not used for commercial air transport. The FAS vision and FASIIIG plans would see continuous climbs and descents but much airspace is designed to accommodate stop altitudes at low levels and low rates of climb reducing or eliminating benefits. Moreover, although traffic using London airports must expect some circuitous routing in the TMA because of interactions, regional airports, spurred on by "low cost" operators expect direct track routing at the expense of VFR operations and access.

Design rules and policy for terminal airspace design should be reviewed and modernised to take account of the limited airspace available and the requirements of other airspace users.

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Airspace & Procedures

As per A1.2

Regulatory & Government Policy

Develop Generic Design Templates to set expectations

ACTION: Paper shares/sizes/rules (RMZ/TMZ/Class D) for ranges of traffic numbers.

Statement on PATM not ATM.

Information Management and Communications.

Safety

A.1.5 Modernise Regulated Airspace

The benefits of the modernisation of regulated airspace has been mentioned before in this plan a number of times and the rationale for it to proceed need not necessarily rest with the VFR Community alone. There is much benefit to be secured by other airspace users, CAT in the main, who are anxious to ensure that the benefits of their considerable investment on the flight deck can be enabled by similar investments in the ground ATM infrastructure. Tailoring airspace to the needs of the users can bring about significant benefit for all airspace users in turn.

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Airspace & Procedures

Regulatory & Government Policy

Information Management and Communications.

Safety

A.1.6 Incentivise the Release of Underused CAS

The charging structure for terminal airspace at airports is based on the number of controllers employed rather than on the volume of CAS allocated. This tends to incentivise ANSPs to maintain as much CAS as possible to run their operation with the minimum of staff. There is no incentive to give up any CAS and this needs to be corrected by a change to a system whereby the volume of airspace managed is directly proportional to charges for its use.

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Airspace & Procedures

Proper review of CAT traffic densities, e.g. Doncaster. Norwich, etc.. Do they deserve their Class D? Method for CAA to de-classify airspace if reality use does not match projected use. Bucket & Spade Class D. If quiet. Turn it off.

Regulatory & Government Policy

Regulate charging per NM³.

ACTION: Paper to investigate, including differential rates per class/type of airspace.

Information Management and Communications.

Safety

A.1.7 CAP 725 Transparency

The Airspace Change Process (CAP 725) requires a sponsor to set out the impact of the proposal on other airspace users in the Operational Report as part of Stage 4. This includes a statement on the operational impact on other airspace users but this report is not released in the public domain. The other airspace users never know the basis of the airspace decision as it relates to their operation. During Stage 7, the Operational Review, they do not know what impact has been accepted in the proposal so have no baseline from which to challenge the airspace. Moreover, if in the future they propose to remove airspace set up in this way, that are not allowed to see the baseline impact that was accepted in the original decision.

The CAP 725 process should be transparent throughout.

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Airspace & Procedures

Applicant summaries views of opposition which is hardly fair! Change required to policy/regulation?

Regulatory & Government Policy

Information Management and Communications.

Safety

A.2 Access to Airspace

A.2.1 Understand VFR Capacity of Terminal Airspace

There is no available measure of the capacity of terminal airspace to support VFR traffic whilst it is used by different volumes of IFR traffic. As a result airspace change sponsors are able to make unsupported statements about airspace access for VFR traffic which are not subsequently delivered. Moreover there is no benchmark to assess if the VFR access provided in terminal airspace is reasonable.

To provide a benchmark, terminal airspace needs to be modelled under a range of IFR traffic conditions. This modelling methodology would be agreed by all users and become the means by which terminal airspace resource is allocated openly and transparently. This would then be used to assess the effectiveness of airspace structures for VFR operations and could reflect the efficiency and environmental benefits that would accrue.

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Airspace & Procedures

Regulatory & Government Policy

Identify appropriate model.

ACTION: CAA paper on minimum infrastructure and review process thereof.

Information Management and Communications.

Safety

A.2.2 Optimise CTR/CTA Structures for VFR Traffic

FASVIG would identify terminal airspace that has a substantial impact on VFR operations and, using the benchmark model, identify areas where improvements could be made.

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Airspace & Procedures

Develop a checklist for airspace review.

Develop GAA that has influence to speak with sufficient authority – based on regional knowledge (regional coordination).

Regulatory & Government Policy

Information Management and Communications.

Safety

A.2.3 Remove Under Utilised Regulated Airspace

Terminal and some en route airspace which is no longer used or which is under utilised should be returned to Class G but there is no incentive for an ANSP to initiate that process. FASVIG would coordinate a review and its organisations would raise airspace changes to resolve this. Full use would be made of the new alternative tools of RMZ or TMZ.

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Airspace & Procedures

Regulatory & Government Policy

ACTION: Review of transparency of continued requirement for controlled/restricted airspace.

Information Management and Communications.

Promulgation of information on Airspace.

Safety

A.2.4 FUA Principles Extended to Access for VFR

Flexible Use Airspace is defined in CAP 740 and applies to military/civil arrangements and certain other activities. There is nothing within this policy that provides for shared use of regulated airspace for VFR operations. Whilst CAP 725, the Airspace Change Process requires sponsors to apply FUA to new regulated airspace this is largely ignored because the policy is not relevant to terminal airspace.

A new FUA policy needs to be developed and implemented.

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Airspace & Procedures

FUA to be updated and extended beyond military.

Regulatory & Government Policy

ACTION: CAA paper on how FUA can be used to regraded (but not remove) airspace

Information Management and Communications.

Promulgation of information on FUA.

Safety

Negative for safety.

A.2.5 Release ATZs at Closed Airfields

ATZs at civil airfields are only established during the hours of operation of the ATS, FIS or A-G. However, military ATZs are either H24 or have longer hours than the unit that controls them. This makes an ATZ at closed military units inaccessible to VFR (or any other) traffic.

Either the ANO should be changed or ATZ periods of operation should match that of the controlling unit.

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Airspace & Procedures

MATZ not in use – Two un-returned radio calls mean clear to go through.

ACTION: Rob Gratton of CAA to confirm.

Regulatory & Government Policy

ACTION: CAA paper on how ATZ/MATZ can be regraded outside hours of operation

Information Management and Communications.

Safety

Positive for safety.

A.2.6 Minimise Temporary Airspace Reservations

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It has become the custom for NOTAMS covering activities such as parachuting to activate the area for many days although it will only be used for short periods within the overall activity period. VFR aircraft avoid the area even when it is not being used for its NOTAM purpose, reducing the available airspace, often in areas where VFR airspace is limited.

NOTAMs (and TRAs) should only activate areas during the period of actual use.

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Airspace & Procedures

Minimise Block Booking.
Review the booking process and make it more reactive.

Regulatory & Government Policy

Query rules/criteria/responsibilities?
ACTION: NOTAM WG – ToR to be checked for appropriateness.

Information Management and Communications.

Safety

Undecided.

A.2.7 Change Class A Airspace For VFR Access

Low level Class A airspace is not accessible to VFR flights and where the area is needed for VFR activity the Class A should be reclassified , normally Class D.

In addition, the recent application of RMZs and TMZs could give an area being considered for CAS to be granted a RMZ in the first instance followed by a TMZ in the second where some doubt exists about the true nature of the need, rather than move to Class 'D' straightaway with all the incumbent problems that would be implied. Traffic use could be more easily monitored to identify need in a better and more quantitative fashion than the more subjective approach.

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Airspace & Procedures

Low Level? Define... Airways with base below 10,000ft.
Class A vs Class D? What is the benefit?

Regulatory & Government Policy

Enable Class D/E airways/TMAs below FL100/10,000ft. No Class A below 10,000ft.
ACTION: CAA to write new policy.

Information Management and Communications.

Safety

Positive for safety.

A.3 VFR Efficiency Enablers

A.3.1 NOTAM Compatibility with Graphical Display

Most civil aircraft intending to operate VFR use a graphical presentation for NOTAMS but many are not compatible with this format. FASVIG would identify areas of issue and propose changes.

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Airspace & Procedures

Regulatory & Government Policy

Information Management and Communications.

Advantageous to have 'App' with graphical interface for use by NOTAM originating users that supports generation of NOTAMs compatible with VFR user graphical presentation.

Safety

Positive for safety.

A.3.2 NOTAM Relevant to Time

Certain NOTAMS cover an omnibus period with the actual activity period detailed in text. This is incompatible with the majority of VFR user NOTAM interfaces and results in clutter, complexity and unnecessary funnelling of VFR traffic.

FASVIG will review and propose a policy change.

FASVIG 4 Break-Out Session Feedback

Airspace & Procedures

Regulatory & Government Policy

Query rules/criteria/responsibilities?

ACTION: NOTAM WG – ToR to be checked for appropriateness.

Information Management and Communications.

Examples: Tour de France, Queen's Birthday Flight.

Better technical facilities need to make it easier for NOTAM originator to generate multiple appropriate time-relevant NOTAMS.

AFTN/AFPEX? Text message notification?

Safety

Positive for safety.

A.3.3 Temporary Reserved Airspace Depiction for VFR Airspace User

Commonly, the notification of TRA is presented as a chart, centred on the airport or facility in question and showing its position from the viewpoint of that airport. However, the VFR user needs to be able to understand the airspace restriction as viewed from outside the TRA. This bias increases workload for the VFR pilot and increases infringement risk.

Where significant TRAs are implemented, the depiction in AICs is legally sufficient but is of little value for navigation. FASVIG will review the possibility of providing, as standard, a downloadable CAA chart depicting the airspace.

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Airspace & Procedures

Regulatory & Government Policy

Information Management and Communications.

TRA – Information provided in machine-readable syntax.

Safety

Positive for safety.

A.3.4 ADSB(out) implementation

The lack of progress towards authorising ADSB(out) from uncertified GPS sources but transmitted through certified Mode S transponders is preventing a significant safety improvement.

The development of a stand-alone ADSB(out) device needs a policy change to introduce a proven safety net and further collaboration is need with the FAA.

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Airspace & Procedures

Regulatory & Government Policy

ACTION: Monitor ECWG output to ensure it happens

Information Management and Communications.

Enablement of ADSB(out) via uncertified GPS to be supported.

Safety

Extremely positive for safety.

A.3.5 Route & Activity Deconfliction Tools

MOD is using a BAe developed system to identify potential track conflicts at the planning stage of a flight. This does not interface with civil systems or invite input related to significant air activities such as gliding competitions. To be fully effective such safety nets need to encompass all airspace users.

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Airspace & Procedures

CADS needs 'read access' to RAF Safety Ctr.

Regulatory & Government Policy

Information Management and Communications.

Collaborative data sharing required, as per Red Arrows routes.

Safety

Positive for safety.

A.3.6 Infringement Risk Warning Tool

Experienced VFR pilots plan their routes to avoid areas where a failure or error might lead to an airspace infringement. Planning tools could include an algorithm to identify and warn about routes which have a high risk of infringement in such circumstances.

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Airspace & Procedures

Regulatory & Government Policy

Information Management and Communications.

Safety

Undecided.

A.3.7 Modernise UK RTF Procedures

UK RTF procedures for VFR aircraft are cumbersome. For example the requirement in CAP413 for the transmission of point of departure and destination when requesting any ATC service is irrelevant and contrary to the procedures published in the UKAIP. However, the CAP413 procedure is enforced rigorously by many ATC units causing congestion and reducing the availability of services.

Efficient access to airspace for VFR aircraft requires RTF procedures and practise that is short and simple such that it can be used effectively and confidently by the private pilot.

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Airspace & Procedures

Think before you PTT?? Dep + Arr airfield? PoB?

Regulatory & Government Policy

CAP 413 is NOT regulation and this remains the case. Query reduce syllabus of radio license?

Information Management and Communications.

Safety

Undecided.

A.3.8 Standardise UK FIS

The names of ATSOCAS in the UK are not those defined by ICAO and are widely misunderstood by VFR pilots. This causes confusion within the UK FIR and beyond when UK pilots use UK-specific terminology. It is cited in the UKAB publication 2014 on page 45; "a misunderstanding of the ATSOCAS regulations seemed to be a common feature of many AIRPROX". This could be resolved at a stroke by adopting ICAO nomenclature. CAP 774 should provide for standard ICAO services.

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Airspace & Procedures

Regulatory & Government Policy

Recommend 'Freedom of Action' for ATC to provide service without fear of the book being thrown at them. Traffic service (as per France now) desired.

Information Management and Communications.

Safety

Positive for safety.

A.3.9 Common UK TA

The present variable UK TA is opaque and is widely misunderstood by VFR pilots. A common high TA should enable release of CAS at lower level.

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Airspace & Procedures

FASVIG 4 Break-Out Session Feedback

Regulatory & Government Policy

Information Management and Communications.

Safety

Positive for safety.