

## ACP-2020-042 Engagement response from NATS – Requirement for Flamborough CTA

[REDACTED]

Following up from our conversation earlier I have provided answers to your questions below.

Regards

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**Subject:** Flamborough CTA

Hi Both,

Just had a conversation with the CAA. They have numerous concerns with respect to the Flamborough CTA as part of the proposal. To that end, we require more information to support the CTA proposal:

1. Justification – why is it required? The CAA's main concern was that no CAS currently exists for traffic routing in/out of Newcastle out with the existing airways structure with East Coast DA activations so traffic currently routes through Class G airspace thus why is this T-CAS required as part of the trial?

NERLs License obligations differ between the London FIR and the Scottish FIR i.e. south and north of 55N. Within the Scottish FIR, lower sectors exist that provide surveillance derived UK FIS but within the London FIR such FIS provision is solely undertaken by London Information. Within the MATS Part 2 this constraint is clearly set out and is most starkly illustrated by our interactions with Newcastle that sits on the 55N parallel. In the past this issue has been resolved by the derogated services LOA between the CAA and the MOD; however, of late the reduction in manpower at SWN(Mil) has

resulted in refusals to provide such services. The activation of an airspace structure that requires the tactical deviation of traffic outside of lower sector configurations i.e. into the London FIR, produces a surveillance service provision gap. This gap is filled by the introduction of CAS-T, within which the CAA is required to designate a temporary controlling authority, this designation would then allow NATS to operate in conformance with its license; without such a structure NATS would be operating outside of its license.

It is stressed that due to AIRAC dates and EU NM modification requirements, that blocking and or manipulation of flight plans for aircraft inbound to NT / NV is not possible for Oct 20, subsequently unplanned extensions of track mileage generate fuel calculation issues which have in previous CACA activations resulted in fuel emergencies being declared. This is not a situation that NATS can continue to support in anyway and therefore an option where tactical deviation produces no significant extension of track mileage must be introduced.

Whilst the option of derogated service provision i.e. SWN(Mil) was considered, it was felt that the requirement to initiate tactical deviation of aircraft inbound from the Copenhagen FIR to NT and NV as well as the integration of such traffic with those in and outbound to/from the MTMA, Dublin and Belfast Group airfields as well as European to Oceanic transits, produced a series of complex co-ordination arrangements that were best dealt with by a single service provider. This would also allow manpower at SWN(Mil) to concentrate on their primary task of ensuring safe ingress and egress from the area by military aircraft, which has been a cause on concern following previous CACA activations.

Finally, due to the presence of significantly larger numbers of Military aircraft within the area, resulting in the need for an airspace structure to accommodate tactical freedom and deviation from the rules of the air, the presence of a temporary but formally recognised airspace structure offers a degree of safety assurance to passenger carrying commercial aircraft required to operate in close proximity to such activity.

**2. Development of the CTA – grateful for information on how NATS/Newcastle developed this CTA and the rationale, linked to the justification as above.**

Development of the CTA design was undertaken in 2 stages. The first iteration required a decent profile of 4<sup>0</sup> from FL250 at 60nm from NT, with an expectation of transfer to NT at 40nm, at approximately FL200. This design was derived from the base level of the Humber Sector and the maximum operating distance of the NT radar. However following review it was determined that this profile was too steep and would be unflyable. A second design was then undertaken that produced a shallower profile from FL 250 at 70nm with an expectation of transfer to NT at 40nm at approximately FL150. Both designs were provided to NT along with an explanation of the change as well as proposed temporary operating procedures associated with prenotification and the transfer of control. Additionally climb profiles were taken into consideration with a range known to exist for aircraft operating from NT to ensure containment of such profiles within the advocated CTA. It was however stressed that this CAS-T volume would not be configured in any flight plan systems or aircraft FMS and as such could be purely used by aircraft tactically deviated away from their flight plan route.

**3. Impact on airspace users – evidence of forecast traffic levels for its use and environmental/noise, benefits and disbenefits.**

The impact to airspace users was undertaken by the MoD as part of its consultation, the full response to this is unknown by NATS. Whilst NATS has tried to engage with airline customers most affected this proposal this has proven difficult in the present COVID environment. In respect of forecast traffic levels; this is exceptionally difficult to determine at this stage. However, the use of CAS-T would be solely limited to aircraft tactically deviated and would not be available for flight plan use. In the normal course of events based on a 3hr operating widow this would equate to approximately 3 aircraft; however, given current COVID circumstances it is not possible to provide

any certainty of this figure other than to say it is not expected to exceed 3 aircraft during each period of activation.

I know you've previously stated that for Oct's "Make CACA Safer" proposal, the Flamborough CTA was essential to support however if it's not approved by the CAA, what is the NATS position with respect to facilitating the exercise and proposed TDA in Oct?

Given the known safety issues associated with previous activations of the CACA and the inability to prevent flight plan use of the routes crossing the area for Oct 20, NATS would have no option other than to formally object to the MoD proposed trial if the proposed CAS-T structure was not approved by the CAA. NATS would then expect the MoD to propose alternative mitigations should it wish to further progress its application.

██████ – Just tried to ring you. Let me know when good to chat if that's easier.

Thanks,

Regards

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