

## Background to this request

- In December 2019 the CAA launched a consultation to ask respondents to identify volumes of controlled airspace, where the classification could be amended to better reflect the needs of all airspace users on an equitable basis. From this consultation over 1000 comments were submitted for consideration.
- Subsequent to this, the CAA published a procedure to support the review of the classification of airspace in the UK, known as CAP1991, effective 1st December 2020. This introduced certain filters to remove airspace proposals that were not appropriate for consideration under this procedure.
- One filter applies to airspace that is subject to an ongoing Airspace Change Proposal at stages 1-4 of CAP1616, or at the equivalent stage of CAP725. Airspace volumes at stages 5-7 of CAP1616 can only be reviewed under this procedure on a case-by-case basis.
- Many ACPs have been paused for over a year as a result of the impact of the Covid 19 Pandemic and therefore could be considered under the new CAP1991 process. However, now that many of these programmes are restarting, we are mindful of not wanting to undermine the broader programme of work to modernise UK airspace.
- Instead, all the relevant responses in the consultation are being passed to change sponsors of ongoing CAP1616 airspace change proposals for their consideration and response.

## Our expectations of Airspace Change Sponsor

- The attached detail below sets out the comments that have been received in relation to the airspace in your ACPs, both as a summary and accompanying visual representation here, as well as the raw data in a separate excel file.
- The CAA will expect to see evidence that the Change Sponsor has considered and responded to this insight at the appropriate stage of the CAP1616 process, in the same way that you would consider and respond to all engagement feedback on your airspace design proposals. The CAA's Airspace Regulation team will look for evidence of this within the ACP's final submission.
- If you believe that the feedback has value but currently lies outside the geographical boundaries of your planned ACP activity, we would welcome the opportunity to discuss with you whether the issues could be addressed through the CAP1991 process in due course.
- Section 70 of the Transport Act requires the CAA to carry out its functions in a way that: *"secures the most efficient use of airspace consistent with the safe operation of aircraft and the expeditious flow of air traffic"*. In carrying out this function in relation to assessing CAP1616 ACPs, the CAA's decision criteria states that beneficial characteristics of an ACP include:

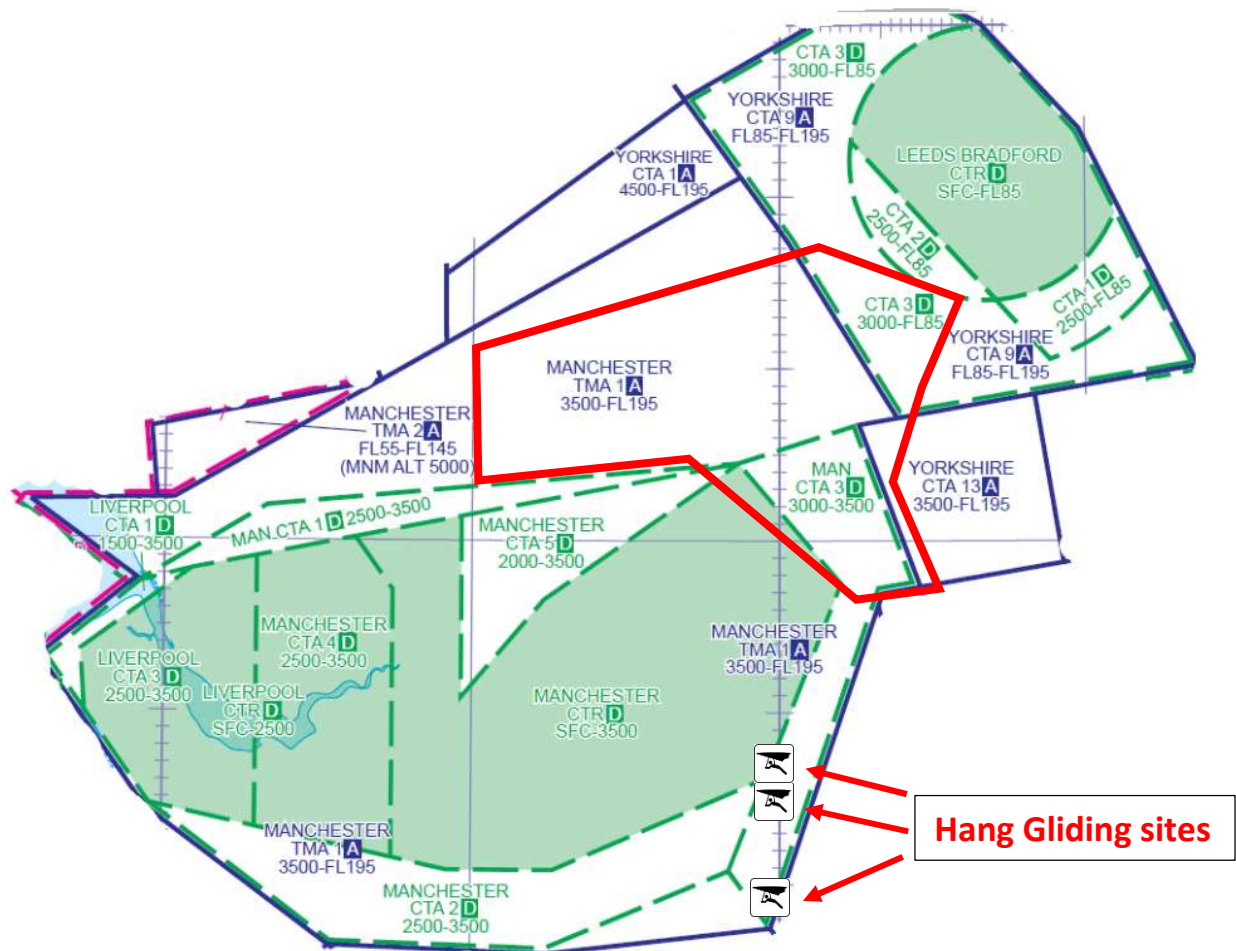
*"[the] volume of regulated airspace (meaning controlled and subject to a classification other than G) is appropriate (including any buffer) for operations intending to use the airspace but no bigger" AND*

*Airspace classification is appropriate for operations intending to use the airspace but classification is no higher than necessary*

- As such we would like to remind all Change Sponsors to continue to review their controlled airspace footprint and classification as part of their ongoing ACP activity.

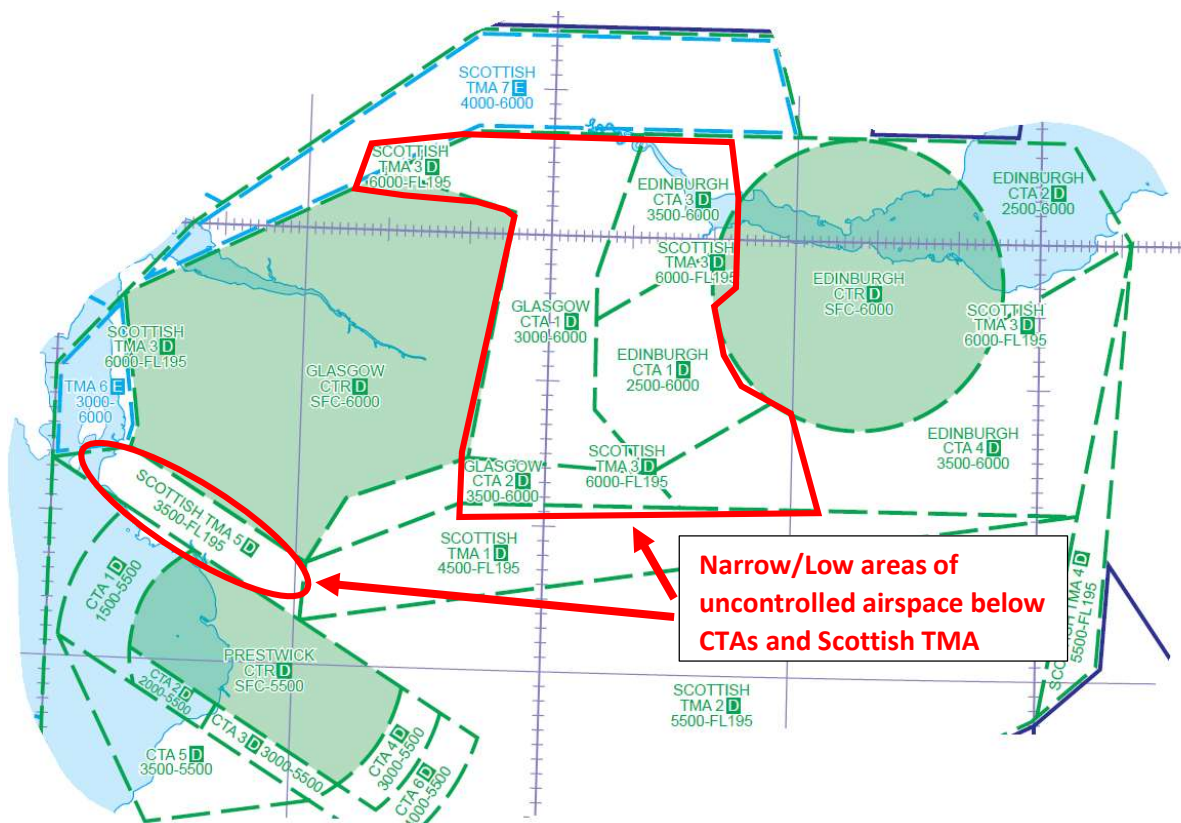
## Responses related to the Manchester TMA

- A lot of the responses focus on the East & South-Eastern corner of Manchester TMA 1 and Southern part of Manchester CTA 3 as the most underused area of Manchester airspace up to 5000ft.
- The Low base level of Manchester CTA 3 and high terrain restricts cross country paragliding/hang-gliding cross-country flights from several launching sites across the Peak District.
- The responses note that the current Class G airspace in this area can get very busy particularly during VFR conditions.
- The responses have requested the airspace base level be raised to 5000ft and some have suggested higher to FL60 and enable more Class G airspace underneath. This is to allow better access for paragliding/hang-gliding activities over high terrain.
- A couple of other comments refer to the North-Eastern part of Manchester TMA 1, where currently there is a pinch point between Leeds Bradford airspace and Manchester TMA 1 which prevent transiting GA aircraft to/from the North-West of England and the Midlands. The responses here have suggested raising the base level to 5000ft to allow better access. One response suggests creating a VFR corridor at FL55 through Manchester TMA 1 North-Eastwards towards the area where Leeds Bradford airspace and Airway L975 are.



## Responses related to the Scottish TMA

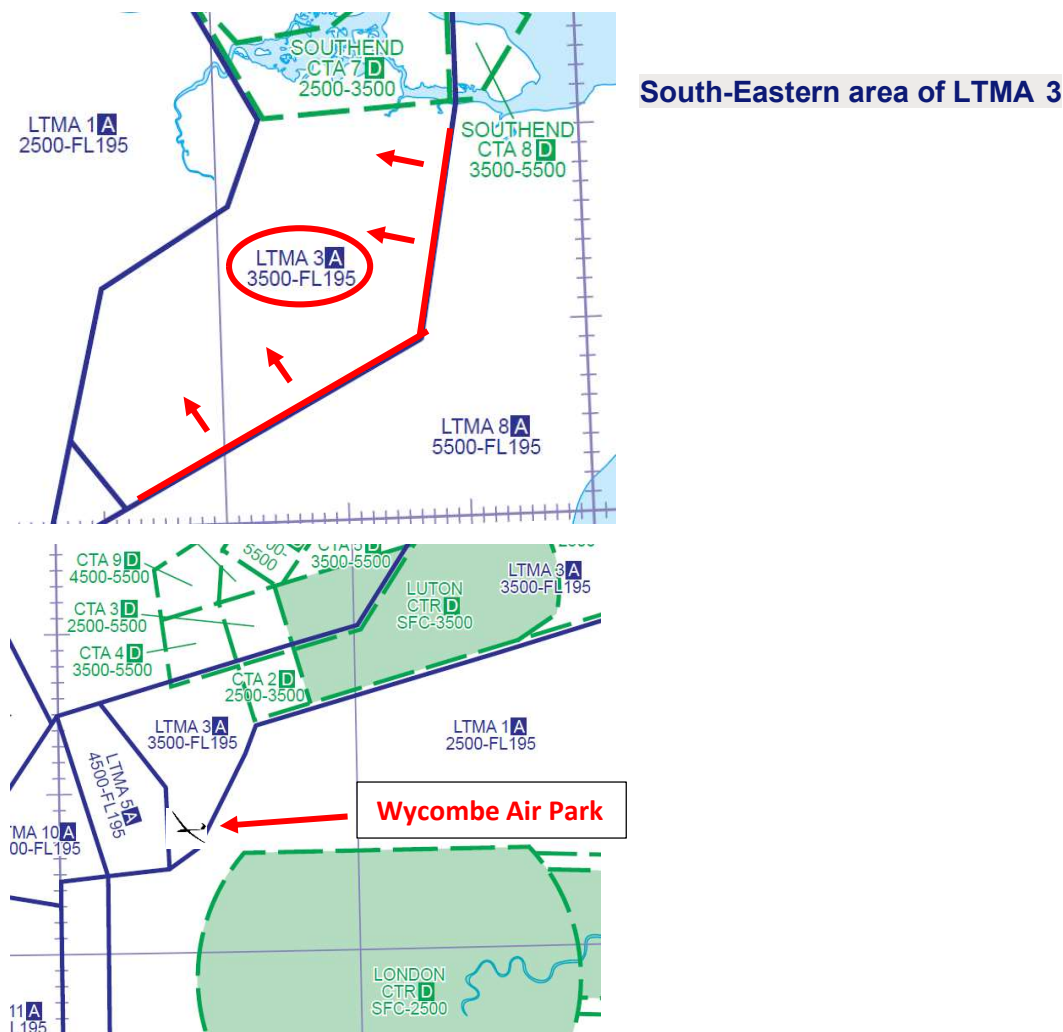
- A couple of responses mention that the uncontrolled airspace below Scottish TMA 5 is too narrow between Prestwick and Glasgow CTRs. GA pilots are having to be extra vigilant due to the high concentration of GA traffic in this small area of airspace, the responses have requested a base level increase for Scottish TMA 5, and also for the airspace to be widened into the Glasgow CTR to increase the gap.
- A few other responses point out the narrow and low area of uncontrolled airspace below the Scottish TMA and various CTAs between Edinburgh and Glasgow CTRs. This area currently prohibits a lot of gliding activity transiting between Scotland and the North of England. The responses request to make the corridor wider and higher to better allow transiting glider flights. Currently the only other way round this airspace is over large areas of water, which from the responses, is looking to be avoided.
- A couple of other responses mention that due to high terrain in the North of the Glasgow CTR, this area is not used by commercial traffic due to terrain clearance, and therefore the SFC-6000ft in the northern part of the Glasgow CTR should be re-classified. One response requested expanding Scottish TMA 7 South into the Glasgow CTR and making everything below the expanded Scottish TMA 7 Class G airspace. The higher terrain providing thermals for gliders.



## Responses related to the London TMA

### LTMA 3

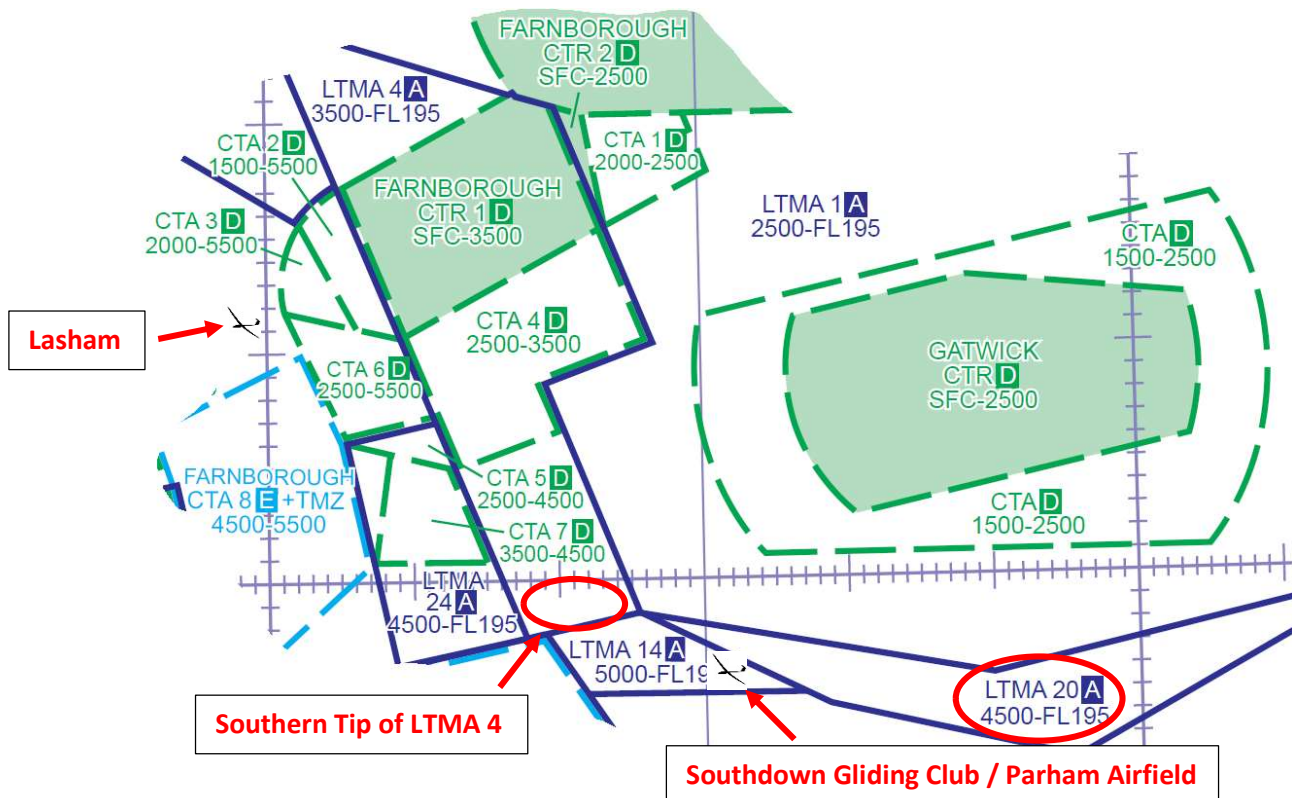
- Most of the responses are highlighting the South-Eastern part of LTMA 3 as underutilised by commercial traffic, and that the base level should be raised to 5500ft to allow better cross country opportunities for gliders and improve the height range without having to route much further south and avoid field landings.
- Some of the responses are requesting for the boundary with LTMA 8 to move North-Westwards to increase the base level of the airspace above the Kent/Sussex area currently within LTMA 3.
- The responses mention a lot of GA activity within the South East area of LTMA3 with various GA airfields and a busy glider club.
- Other responses mention the airspace of LTMA 3 above Wycombe Air Park does not provide a high enough base level for training flights above the airfield and the town.
- The responses for Wycombe would like to see the LTMA 3 area here raised to 4500ft and have noticed no commercial traffic using this piece of airspace at this level.
- A couple of other responses mention a Letter of Agreement which temporarily allows the airspace above Wycombe Air Park to be raised during glider competitions to 4500ft. The responses ask why the airspace here cannot be raised permanently to 4500ft.





## LTMA 4 & LTMA 20

- Most of the responses for LTMA 4 and LTMA 20 are highlighting the same issues.
- The responses referring to the Southern tip of LTMA 4 want the base level of this airspace raised to 4500ft.
- The responses referring to LTMA 20 want the base level of this airspace raised to 5500ft.
- The responses say the extra height requested in both LTMA 4 and LTMA 20 will help when soaring conditions fade during the afternoon and assist returning glider flights. They also mention the extra height will also help separate all other GA traffic from gliders.
- The responses all highlight issues with gliding below controlled airspace, particularly for gliders operating between the South Downs gliding club and Lasham.
- Concern has been brought about by the new controlled airspace structures around Farnborough making transiting glider flights difficult between the two glider sites.



## LTMA 1

- All respondents suggest a base level increase of LTMA 1. The main areas that have been highlighted being the Southern and Eastern parts of LTMA 1.
- Several responses focus on the narrow corridor of class G airspace between Heathrow and Gatwick airports under LTMA 1, where the terrain is high in places, and a lot of GA activity exists.
- Some responses have commented how commercial traffic would not be using airspace immediately to the North/South or East of Gatwick at the lower levels of LTMA 1 due to climb rates of aircraft out of / CDA approaches into Gatwick.
- Many responses also suggest the boundary of the South-Eastern area of LTMA 1 between Tonbridge and Southend could be moved northwest to increase altitude band available to GA traffic and facilitate operations to/from Rochester airfield. Some respondents suggest raising the base level in this area rather than moving airspace boundary northwest.

## LTMA 11

- All responses on LTMA 11, particularly the “Compton Box” (airspace around CPT VOR), all of them suggesting raising its base level from 4500ft to 5500ft claiming airspace volume from FL40 to FL60 is underutilised and additional altitude available would improve safety of cross-country glider flights, especially from Lasham, and reduce number of airspace infringements. A few responses also make note of improved climb performance from aircraft operating out of Heathrow and not needing the lower part of this airspace.
- Many respondents mention existing Letter of Agreement and say it should be made permanent, at least during daytime hours. Other responses have mentioned flexible use of the airspace so gliders can use this airspace during summer soaring months only.

## Responses related to the Daventry CTAs

- 32 responses mention Daventry CTA 9, 15 responses mention Daventry CTAs 1 & 7, and 14 responses mention Daventry CTA 3, all suggesting raising base levels, mostly by 1000ft. Majority say this change could be either permanent or during daytime hours.
- 52 respondents claim current base levels severely impact cross country gliding operations and create safety implications by forcing aircraft into proximity of each other (“choke points”).
- Several responses mention existing Letters of Agreement but claim that there are no reasons why base levels could not be raised permanently as the airspace is underutilised and has remained the same despite of improved climb and descent performance of currently used aircraft. Observations that little commercial traffic operate at the lowest levels of Daventry CTA 1 & 7.
- Other responses mention low base levels of the Daventry CTAs 1, 7, 8 & 9 over high terrain creates a small window of airspace for GA flights.

## Responses related to Airways

- A few responses talk about Airway P600 as under-utilised especially at the lower levels, these comments specifically talk about P600 between the Scottish TMA and Aberdeen CTA which has acted as a barrier to cross country gliding. The responses highlight that Airway P18 manages a similar level of traffic, but this Airway is Class D, whereas P600 is Class A.
- The responses have requested the base levels of sections of P600 to be raised in certain areas notably during daylight hours, or the airway to be re-classified as either class D or class E. A couple of other comments have suggested airway P18 to be opened up H24 to reduce the need of lower levels of airway P600.
- Some of the responses have said some of the existing LoAs in place are complex and sometimes un-usable citing an hour's notice for glider pilots to give for certain access.
- Some responses mention the lower levels of airway N560 between waypoints ERSN + GUSI are not being used by commercial traffic. The responses go on to say that the current airway set up is prohibitive to gliders because of the need to fit expensive transponders and the need to talk with ATC if using or crossing this airway. The terrain in this region is high with a lot of unusable landing areas, so currently flying under the airway is the only option for many glider pilots. Some responses have requested to de-classify areas of the airway while one response asks for the TMZ requirement to be removed.
- Some responses mention airway L975 at its lowest base level of 3500ft in Manchester TMA 1 and Yorkshire CTA 13 currently restricts a lot of cross-country paragliding and hang-gliding in the Peak District and is not used much by commercial traffic. The responses have requested this airway and corresponding TMA base be raised to 4500ft-5000ft to provide a safe and accessible area above the high terrain.
- A few other responses mention Airway N864 north of Edinburgh should either be removed or re-classified as a Class D/E airway. The responses mention low utilisation at the lower levels between Aberdeen and Glasgow/Edinburgh, and a lot of traffic uses Airway P18 or P600 instead. The removal or de-classification would enable gliders to climb higher in this region.

## Responses related to Niton, Cotswold & Portsmouth CTAs

- One response raises a concern of the base level of Portsmouth CTA 5, and the safety of flying a single engine aircraft so low over water when flying to the Channel Islands.
- One comment asks for COTSWOLD CTA 5/6 to be raised in the winter months when gliding conditions are at their best.
- A couple of responses want the Western boundary of NITON CTA 3 to be moved 1nm east so the boundary can align with the Clwydian Range where a lot of glider activity takes place.
- One response asks if NITON CTAs 10+11 could be incorporated into the Riles Gilding LoA, so higher gliding opportunities can be explored in this area. Alternatively, the response requests NITON CTAs 10+11 to be raised to FL145.