

From: [REDACTED]
To: [REDACTED]
Subject: FCA ACP Supplementary/Clarification Information
Date: 15 September 2023 15:45:00
Attachments: [image001.png](#)

[REDACTED],
We are still progressing with our regulatory assessments of ACP-2020-026 but have identified some areas requiring supplementary information or clarification.

In accordance with CAP1616 Para 222 may I ask for information on the following areas:

- **Number of activations.** No figures have been presented in the main submission that enable a clear understanding of the expected activations of the proposed airspace design or those that have been used to determine the impacts. Clarity is required regarding what figures were used as part of the analysis of the impacts, what figures were presented during the consultation (along with any explanations on differences between this and those used in the analysis), what are the current assumptions on usage and how this might differ from those used during the analysis and presented in the consultation. Where there are differences in these figures, please describe what assessments have been made on the validity of the analysis and/or consultation where there may be differences in the anticipated impacts. This can be provided within a new supplementary document, although alternatives can be discussed.
- **Concept of operation.** It is not clear in the submission how General Aviation Traffic flights currently operate in the area. This relates to those transiting across the airspace, those departing from nearby airports and those arriving to nearby airports. A mix of terms are used trying to describe where flights are following routes, are in Free Route Airspace, and where they may be inside or outside controlled airspace, but the descriptions are not sufficiently clear to then understand how they would operate when the proposed airspace design is activated. Plain English information needs to be provided such that it is clear whether some flights are impacted or not (positively or negatively), where re-routing is required and how this will be achieved (eg use of Waypoints and FBZ, tactical re-routing, flight-plannable DCTs, different service provider etc). The requirement is for stakeholders to understand how flights currently operate in the area and what changes will occur during activations of the proposed airspace design. This can be provided within a new supplementary document, although alternatives can be discussed.
- **Development of the FBZ and Waypoints.** The submission does not provide sufficient detail to understand how the proposed new Waypoints and FBZ have been developed, or how they have been assured as being safe and appropriate. The description of the FBZ does not state clearly enough what the vertical implications/requirements are. The SUA Buffer Policy provides a requirement for a 5nm buffer against controlled airspace volumes but 10nm is required in the Class C airspace above FL195 (ie providing a 5nm buffer against an RNAV 5 ATS Route where the accuracy requirements are 5nm) – the proposal states that the 5nm FBZ is in compliance of the Buffer Policy but it is not clear in the submission how this is the case. FBZs less than the standard described in the Policy are in use across the UK but these have been assessed and determined to be safe and appropriate for their unique circumstances, with the CAA having accepted these arguments within ACPs. Information is required that describes the processes used to establish the Waypoints and FBZs, what their

impacts are, and how they have been determined to be safe and appropriate for the proposed airspace design. Where dispensations are required against policies, requests should be included with the supplementary information. This can be provided within a new supplementary document, although alternatives can be discussed.

- **Clarity of Change Required to the AIP.** A document is provided that provides required updates to information in the AIP not included in the Aerodata spreadsheet. This only provides what the new text should be and it cannot be seen what the requested changes are. An updated version of this document is requested that shows the current text and what the proposed changes are.
- **Source of VFR Heat Maps.** Figures 12 and 13 are provided in the FOA that show VFR 'heat maps' for use of UK airspace. Clarification is sought as to whether these have been sourced from the FASVIG or Airspace4All – the figures seem to indicate that these are from FASVIG but include a link to the old FASVIG domain no longer in use, whereas the narrative describes them as coming from Airspace4All. An email response is satisfactory in this matter but you may wish to update the submission if there are other adjustments to make as a result of the other enquiries.

Please let me know if you wish to discuss any of these matters further; however, timely provision of a response is essential in order to maintain the current timeline for a decision by 17 Nov so may I suggest a target date of 6 Oct? As per CAP1616 Para 223, the request for, and provision of supplementary information and any subsequent amendments to the proposal will need to be published on the Portal in due course.

Regards,

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