

Kirknewton Visual Reference Point (VRP) change

Airspace Change Proposal Document (v3.0)

OTH-2025-003

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Section 1 Introduction

Following an Airprox in 2024, Air Navigation Solutions Limited (ANSL), who are the air traffic service provider at Edinburgh Airport, and the UK Airprox Board recommended that VRPs in the Edinburgh CTR should be reviewed. Following the review a change has been requested (through the CAA's Airspace Change Portal) to ensure that the KIRKNEWTON Visual Reference Point (VRP) is differentiated from KIRKNEWTON AIRFIELD. A VRP is still required in the Kirknewton area for co-ordination and routing guidance even when Kirknewton airfield is not active.

The objective of the change is to replace the existing VRP with a new one at KIRKNEWTON RAILWAY STATION. The new VRP is situated approximately 0.5nm to the WNW of the existing one.

This document provides a summary of the proposal and the actions that have been and will be completed by ANSL to ensure a safe implementation of the change once CAA approval has been granted.

Note - This is version 3 of the document, which corrects an error in section 3.1.1 – the proposed VRP co-ordinates were not changed from the previous version.

Section 2 Reasons for the change

The key reason for the change is safety - to prevent confusion to airspace users and to facilitate clearer ATC instructions for transits across the Edinburgh CTR. The other element is that the existing VRP does not effectively meet the requirements detailed in the CAA policy statement (SARG Policy 114) for the establishment of VRPs in that it is not based upon a prominent ground feature. The new VRP is also positioned slightly further away from Kirknewton airfield.

Section 3 Airspace Change Proposal (ACP)

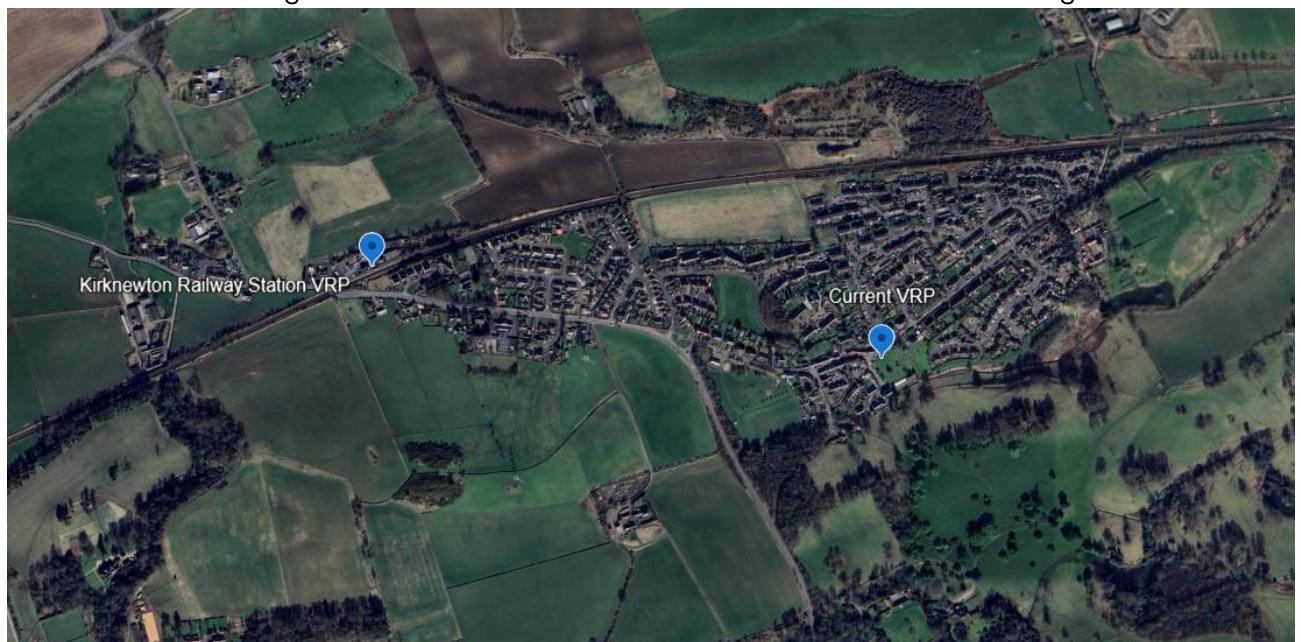
3.1.1 ACP submission

ANSL submitted a statement of need (DAP1916) on the CAA's airspace change portal on the 24th January 2025 – CAA Reference OTH-2025-003.

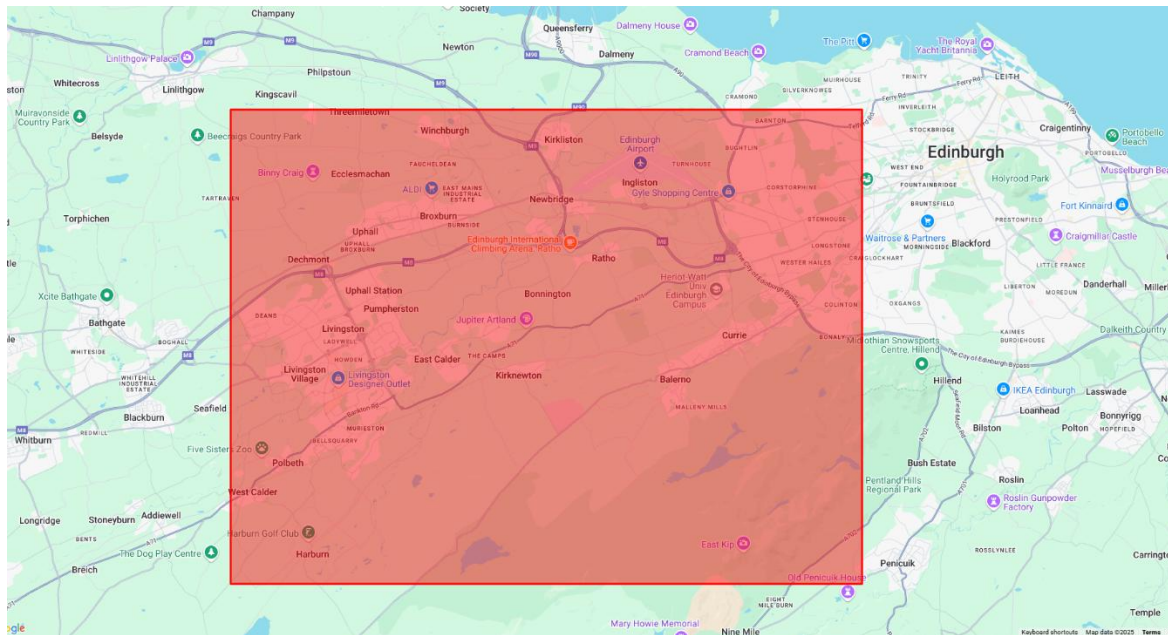
Obviously, ANSL are the sponsor for the change and the Manager Air Traffic Control (MATC) will be responsible for the implementation of the change when the ACP is approved.

The current VRP is at position 555315.00N 0032505.00W. The proposed Kirknewton Railway Station VRP is at 555320.60N 0032600.20W. Both the existing and new VRP are positioned in the Edinburgh CTR.

Details about the change from the current to new VRP reference are shown in the image below:



The area affected by the change is shown in the map below:



3.1.2 Assessment meeting

Following the assessment meeting process the CAA have confirmed that the ACP can be progressed as an Applicability and Policy Alignment Check (APAC). This is on the understanding that the change to airspace design will not alter flight behaviours.

3.1.3 Timetable

In co-ordination with the CAA, ANSL have agreed the following timetable for the management of the change:

- Stage Plan -		
1	Assessment Meeting	30/01/2025 (Actual)
4	Submit Proposal to CAA	30/05/2025 (Target)
5	CAA Decision Finish	27/06/2025 (Target)
6	AIS Submission	04/07/2025 (Target)
6	AIRAC Effective	02/10/2025 (Target)

3.1.4 Airspace User engagement

Kirkcaldy airfield users

ANSL have letters of agreement in place with two operators at Kirkcaldy airfield. They were both consulted about the change.

- **2FTS –**
 - Royal Air Force glider operator who utilise a designated gliding area procedure agreed with Edinburgh ATC.
 - They fully supported the change and requested that the Letter of Agreement (LoA) is reviewed in line with the ACP approval process timetable.
- **Kirkcaldy Flying Group –**
 - General Aviation operator.
 - They supported the change.
 - Noted that the current LoA does not reference the existing VRP and clarity would be welcome as the LoA is reviewed as part of the change.

Edinburgh ATC also noted that there should be a limited impact on how aircraft are routed to access the Kirknewton airfield for these operators.

Local Airspace users

Other local airspace users were informed through the Scottish Local Airspace Infringement Team (LAIT). This included representatives from the:

- CAA Airspace Infringement team,
- NATS Glasgow ATC & Prestwick FISO,
- HEMS,
- Perth Flying School,
- Strathtay,
- Strathaven,
- Deeside Gliding.

No objection to the change was received from this group. Minor comment was made about the relevance of the move of half a mile and length of the VRP name.

Edinburgh Airport Limited

- No objection to the change. No anticipated issues noted with the proposed future airspace design.

3.1.5 Other Feedback through the portal

No other feedback has been received through the portal by other airspace users or the local community.

Although ANSL does not keep extensive records on the number of aircraft that route via the existing Kirknewton VRP, anecdotal evidence from the operational team suggests that no more than one aircraft a day (averaged over the year) use this VRP when transiting the CTR. By the very nature of aircraft flying VFR, route dispersion and variation would also mean that the impact of the change to those on the ground would be very low.

Section 4 ANSL Change management

ANSL is managing the airspace change by following our approved change management process (in line with the ATC regulatory requirements). As noted above the MATC is responsible for the change.

As part of this process, the MATC convened an operational impact assessment. The assessment concluded that the change will be acceptable subject to following the agreed change process and timetable with the CAA and completion of engagement with local airspace users.

Details of the safety assessment (hazard analysis) that has also been undertaken and the expected notification process are shown in section 5.

Section 5 Considerations for implementation

5.1 Safety

As noted in the reason for the change, safety is the key element of this airspace change proposal. ANSL also has an obligation to ensure that any change is managed safely and that air traffic service provision and airspace users' operations will not be adversely affected.

ANSL also needs to demonstrate an acceptable level of safety throughout the lifecycle of the change – through the point of implementation, which will continue to do so post implementation.

5.1.1 Hazards & Mitigations

The safety assessment identified the following hazards and mitigation measures. The mitigation measures will be tracked through ANSL's change management process.

Hazard	Mitigation
ATC unaware of the change	- ATC operational instruction published. - Updates to relevant SDPS (radar display) maps and charts used in operational documentation.
Airspace users unaware of the change	- Update AIP and associated AIS information (e.g. VFR charts) - Communication to the local flying community (via LAIT). - LoA updated
Incorrect use of the new VRP by ATC	ATC operational instruction issued detailing expected use of the new VRP
Letters of Agreement change – incorrect or ambiguous information included.	Review and publish new LoA with 2FTS and Kirknewton, following ANSL safety and change management process.
Naming convention – confusion by airspace users (unsure of where VRP is)	- Update AIP and associated AIS information (e.g. VFR charts) - Communication to the local flying community (via LAIT). - LoA updated

5.2 Quality management

5.2.1 Formal submission of the amendment for the AIP

As per the requirements detailed in SARG Policy 125, formal submission of the amendment to CAA Airspace Regulation team will be via the latitude and longitude tab of the aero data spreadsheet in degrees, minutes and seconds format.

The submission will also be in line with the proposed timetable for the change.

5.3 Notification to airspace users

The AIP change will be the formal notification to airspace users. However, as detailed in the mitigations from the safety assessment, ANSL will also provide relevant communications to local airspace users about the change in VRP and any procedural change.

5.4 Letters of Agreement

The summary of engagement and the safety assessment detail the requirement to review the Letters of Agreement in place with Kirknewton airfield users. The MATC will be responsible for

managing the process and notifying our ATS inspector of the revised letters of agreement. Any procedural changes will be notified to the ATC operational team through the publication of new instructions.

5.5 Post implementation review

Through the safety assessment process, ANSL have identified that a safety monitoring criteria (SMC) will be put in place to monitor any safety issues for a period of six months after the implementation. If there are any immediate safety concerns, then these will be managed through the ANSL safety management process and use of the new VRP may be suspended.