NATS

On behalf of NL Ministry of Infrastructure and Water Management, Directorate-General for Civil Aviation and Maritime Affairs

Ministerie van Infrastructuur en Waterstaat

Ministry of Infrastructure and Water Management, Directorate-General for Civil Aviation and Maritime Affairs
Civil Aviation Directorate | Airspace and Regional Airports

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Airspace Change Proposal for ACP-2025-009

Alignment with Dutch changes to K13A procedures in North Sea Area V

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1. Introduction

1.1. Background

This document forms part of the documentation package required under the UK Civil Aviation Authority (CAA) CAP1616 Airspace Change Process. At the Assessment Meeting for this change (ACP 2025-009), the proposal was classified as a pre-scaled Level 3 change and will therefore follow the process requirements set out in CAP1616H. These scaled requirements are documented in the Assessment Meeting minutes, published on the CAA ACP portal[1].

The proposal concerns helicopter Point-in-Space (PinS) flight procedures to the K13-A platform, located within the Dutch Exclusive Economic Zone but in airspace that forms part of the UK London FIR, where Air Traffic Service (ATS) provision is delegated to the Netherlands.

To ensure proper alignment of the UK and Dutch airspace change processes, the Dutch Ministry of Infrastructure and Water Management (IenW) is working in coordination with NATS En Route Limited (NERL), the UK-side change sponsor for this airspace change.

1.2. Drivers for change

Several large offshore wind farms are planned in the vicinity of the K13-A platform (including Nederwiek I and II/III) on the Dutch side and Norfolk Boreas on the UK side, with wind turbine tip heights of up to 1,000 ft.

Under current Instrument Meteorological Conditions (IMC), helicopter access to K13-A relies on Airborne Radar Approach (ARA) procedures. These require a wide obstacle-free area around the platform, which is incompatible with the planned wind farm layouts.

To maintain safe and reliable helicopter access to K13-A in a future environment with wind farms, the Dutch Ministry of Infrastructure and Water Management (IenW), sponsored by the Dutch Ministry of Climate and Green Growth (KGG), is implementing PinS approach procedures. These procedures significantly reduce the spatial footprint compared to ARA, enabling continued safe operations despite the presence of wind farms.

The K13-A implementation serves as a pilot project to gain operational experience with PinS procedures in the offshore environment and assess their potential for broader application at other platforms.

1.3. Aims of the proposal

The primary aim of this Airspace Change Proposal is to maintain safe and reliable helicopter access to the K13-A platform in a future environment with nearby wind farms.

By implementing PinS approach procedures, the proposal seeks to:

- Introduce a new set of procedures for offshore helicopter operators, providing safer and more contained approaches with reduced spatial requirements compared to ARA procedures.
- Ensure continued operational accessibility to K13-A despite the presence of wind farms.
- Gain operational experience with offshore PinS procedures to assess their suitability for broader implementation at other offshore platforms.

[1] https://airspacechange.caa.co.uk/PublicProposalArea?pID=703

1.4. Assumptions and constraints

The PinS procedures have been developed in accordance with the Dutch Airspace Change Process, including its engagement requirements, and are aligned with the applicable provisions of the UK Airspace Change Process to ensure procedural consistency across both jurisdictions.

It is assumed that the proposed procedures will be published in the Dutch AIP. A textual cross-reference may be included in the UK AIP to indicate their relevance to operations in North Sea Area V of the London FIR, where ATS is delegated to the Netherlands.

1.5. Summary and timeline of proposed changes

The proposal introduces three PinS approach procedures to the K13-A offshore platform. Implementation is planned for December 2025 (AIRAC 13/2025, effective date 25 December 2025).

Note on K13-A PinS departures
At the time of the Statement of Need and the Assessment Meeting, it was anticipated that both PinS approaches and departures would be implemented under this ACP.

Following further development during the final design stage (Stage 4), it was decided that the departures will be progressed under a separate but linked Level 3 ACP to allow for additional testing.

2. Stage 1: Define

2.1. Statement of need

The Statement of Need (DAP1916) was submitted on 18 February 2025 as below:

Objective
To implement offshore Point-in-Space (PinS) instrument procedures to the K13-A gas production platform, initiated by the Netherlands.

Issue / opportunity to be addressed
The proposed procedures aim to improve operational safety by introducing modern, more contained instrument procedures. These will provide a safer alternative to the currently used Airborne Radar Approaches (ARA), which require large obstacle-free areas and are increasingly incompatible with the development of offshore wind farms, in this case near K13-A.

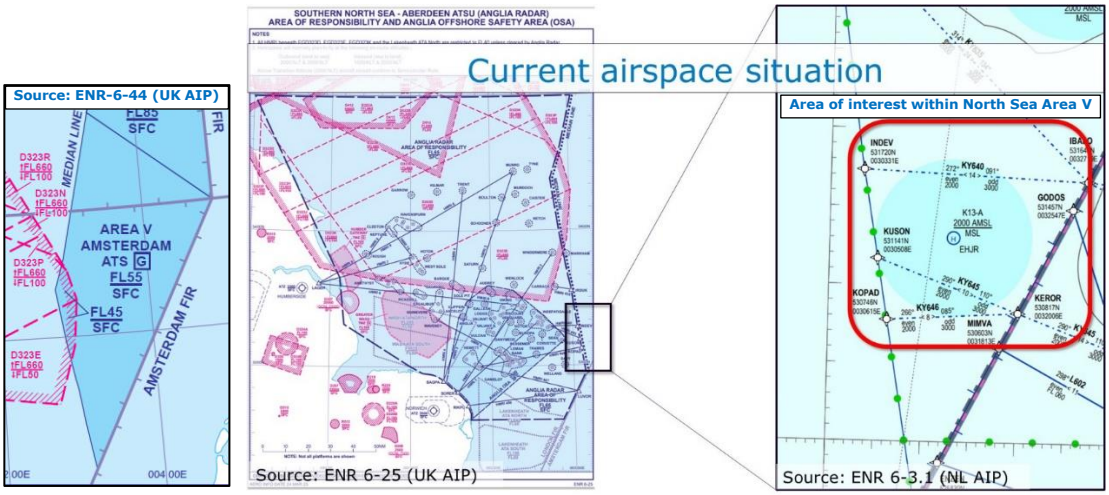
Current airspace design
K13-A is located in North Sea Area V, which is classified as Class G airspace. Air Traffic Services (ATS) in this portion of UK airspace are delegated to the Netherlands, with services provided to all traffic at or below FL55 (or below FL45 beneath EGD323D & EGD323E).

Current prevailing air traffic situation
Helicopter traffic to/from K13-A averages approximately one flight per day, with no significant change forecast.

2.2. Current Day Scenario

Airspace Design & Usage

The figure below shows the geographical area within the scope of this change proposal, as described in the Statement of Need.



In the current operational environment, there are no published flight procedures specific to K13-A in the AIP, and no offshore wind farms have yet been constructed in the vicinity. Helicopter access to the platform takes place primarily under Visual Flight Rules (VFR) when conditions allow, or via Airborne Radar Approach (ARA) in Instrument Meteorological Conditions (IMC). These operations are conducted within Class G airspace and are monitored by Amsterdam FIC.

2.3. Design Principles

The CAA has assessed that this ACP is only required to apply the mandatory design principles set out in CAP1616. The design options have been evaluated against these principles.

Mandatory Design Principles	
MDP Safety	The airspace change proposal must maintain a high standard of safety and should seek to enhance current levels of safety
MDP Policy	The airspace change proposal should not be inconsistent with relevant legislation, the CAA's airspace modernisation strategy or Secretary of State and CAA's policy and guidance.
MDP Environment	While the environmental principle is not formally applicable, the proposal should avoid overflight of densely populated areas where practicable.

3. Stage 2: Develop and Assess

3.1. Design Option Development

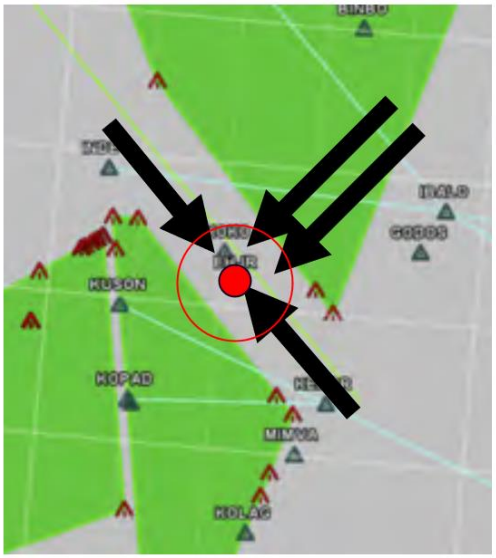
A single design option has been developed for this ACP.

The proposal introduces new PinS approach procedures with a proceed VFR segment to the K13-A platform:

- PinS APCH DIR 314, VPA 7.5% (500fpm @ 70kts), LNAV + LPV minima
- PinS APCH DIR 134, VPA 7.5%, LNAV + LPV minima
- PinS APCH DIR 226, VPA ~11%, LNAV minima, turn at MAPt (right turn)
- PinS APCH DIR 226, VPA ~11%, LPV minima, turn after MAPt (left turn)

These procedures are based on EGNOS LPV and LNAV minima. They use GNSS guidance and radio altimetry to ensure precise and safe operations within the required obstacle clearance area.

The figure below illustrates the proposed concept.



3.2. Design Principle Evaluation and other impacts

The design option has been qualitatively assessed against the mandatory design principles. All principles are considered to be met, and the design option has progressed to Stage 3: Consult/Engage.

Mandatory Design Principles	
MDP Safety	Risks remain within acceptable and tolerable limits (ALARP) while allowing the progression of large scale windfarm developments adjacent to the platform.
MDP Policy	The area of impact of this airspace change is very limited and situated remote from major air traffic flows. (Class G airspace, below 2,000 ft, 50 NM offshore). The proposal is not inconsistent with relevant legislation, the CAA's Airspace Modernisation Strategy, or policy and guidance from the Secretary of State and the CAA.
MDP Environment	The location of the airspace change is 50 NM offshore; overflight of densely populated areas is not an issue. Therefore no further environmental assessment is required.

3.3. Additional items for Stage 2 as per CAP1616H para A19

Economic impacts: This proposal would have an economic benefit by allowing the maximum size windfarms to be as close as safely possible to the platform.

Safety, procedure design considerations, and design sub-option not being carried forward: see para 5.1. All procedure design work, validation, safety case and associated assurance will be completed under the Dutch airspace change process. Evidence will be supplied to the UK CAA (see para 5.6 for list of supplementary documents).

3.4. Habitats Regulations Assessment (HRA) screening

In accordance with CAP1616i page 33:
Habitats Regulations Assessment – Early Screening Criteria
Q1. Are there any changes to air traffic patterns or number of movements expected below 3,000 feet due to the airspace change proposal?
Answer: Yes.
If the answer to Q1 is 'no' then habitats regulations assessment is no longer required.
If the answer to Q1 is 'yes' then proceed to Q2 below.
Q2A. Are there any European sites within a radius of 18 km of each runway end?
Answer: No
Q2B. Are any European sites identified in Q2A overflown (i.e. plane passing directly overhead or within 2,655 feet of the boundary of a European site at 3,000 feet or below) by proposed flight routes?
Answer: No
If the answer to Q2A and Q2B are both 'no' then habitats regulations assessment is no longer required.
If the answer to Q2A or Q2B is 'yes' then proceed to Q3 below.
Q3A Will the airspace change proposal reduce the number of movements overflying one or more European sites, while not increasing them over another?
Q3B Will the airspace change proposal increase the altitude of aircraft overflying one or more European sites, whilst not decreasing altitude over another?
If the answer to Q3A and Q3B are both 'yes' then habitats regulations assessment is no longer required.
If the answer to Q3A or Q3B is 'no' then secondary screening will be required.

The conclusion of the HRA screening is Q1 Yes, Q2A No and Q2B No, therefore **no further assessment is required**.

4. Stage 3: Consult / Engage

4.1. Engagement Strategy

The Engagement strategy outlines how relevant UK stakeholders will be engaged, as required during the design and development phase of the CAP1616 process.

4.2. Objectives

The engagement aims to inform relevant UK stakeholders of the proposed design and its potential impacts, gather their feedback on operational and safety considerations, and incorporate relevant input into the final design.

4.3. Engagement Audience (Stakeholders)

The relevant UK stakeholders for this ACP are:

- the UK Ministry of Defence, via Defence Airspace and Air Traffic Management (DAATM), its role to safeguard military aviation operations within UK airspace, including the London FIR where K13A is located;
- the UK Maritime and Coastguard Agency (MCA) to assess any impact on Search and Rescue (SAR) operations;
- UK offshore helicopter operators to evaluate potential impacts on their commercial operations.

Note: All relevant Dutch aviation and non-aviation stakeholders are being engaged separately through the Dutch airspace change process, as described in the document 'Wijzigingsproces Luchtruim en vliegprocedures' .

4.4. Engagement materials

A PowerPoint slide deck was used as the primary engagement tool to present the proposal and support stakeholder understanding.

4.5. Engagement Summary & Responses

Engagement with the identified UK-based stakeholders was conducted between 1 July and 31 July 2025. The responses received during this period are summarised below.

- Stakeholder **MoD**
  Received: email 7 July 2025
  Response: *I can confirm that this would likely have negligible impact on UK MOD airspace users.*

- Stakeholder **MCA**
  Received: email 7 July 2025
  Response: *In terms of Search and Rescue (SAR) operations, I have confirmed with His Majesty's Coastguard service provider Bristow Helicopters Limited, that they would not be conducting operations under Commercial Air Transport, but rather under CAP 999. As such they do not believe that the proposed changes will affect their operations.*

- Stakeholder: Heli Offshore on behalf of the **UK offshore helicopter operators**
  Received: email 5 August 2025
  Responses on the questions presented below:
  1. Would the introduction of these procedures impact your current operation?
     Response: No

  2. Would it impact your near-future operation?
     Response: Unlikely, unless these 'dynamic' PinS approaches become a standard template for similar situations in other parts of the North Sea/ Irish Sea

  3. If you were considering flying this procedure, what operational impacts would there be?
     Response: Currently we would not consider flying this procedure. There would have to be a significant amount of design scrutiny, simulator / flight evaluation

and comprehensive risk assessment of the proposal. Part of this process would be the need to asses [sic] OEI climb performance, which is usually based on flying a straight line rather than incorporating an abrupt turn in the event of a missed approach. Changes to the current PinS approach, as presented yesterday, would probably be required. In addition this PinS approach would need to be approved by the UK CAA. If it were approved, the pilots would require specific training in advance of flying to the K13A. Depending on the outcome of the assessment, there might be some additional restrictions (wind direction, winter icing, etc.) placed upon flights to/ from the K13A. It is likely that a number of flights would be cancelled to this platform due to poor weather or wind from specific directions.

Note on response 3 above: All appropriate design compliance and safety evaluation evidence will be progressed and presented to the CAA NL under the NL airspace change process

4.6. Conclusions on stakeholder feedback

Comments from HeliOffshore were considered. They responded there would be no impact on UK heli operators' current operation, nor in the near future. The final item of feedback made suggestions and recommendations; however it did not lead to any changes being made to the proposal.
Users of the proposed procedures would benefit from the safety and accuracy of the approaches, and we do not predict any negative impacts to any other airspace users.

4.7. Additional items for Stage 3 as per CAP1616H para A24

Economic impacts: This proposal would have an economic benefit by allowing the maximum size windfarms to be as close as safely possible to the platform. This was voiced over during the presentation to UK helicopter operators.

Safety, procedure design considerations, and design sub-option not being carried forward: see para 5.1. All procedure design work, validation, safety case and associated assurance will be completed under the Dutch airspace change process. Evidence will be supplied to the UK CAA (see para 5.6 for list of supplementary documents).

5. Stage 4: Update & Submit

5.1. Final design options

The final design options are summarised in the table below. It was decided not to implement the fourth (LNAV only) PinS approach procedure in order to maintain consistency with other planned PinS approach procedures (all LPV and LNAV) in the Dutch North Sea area.

Current procedures	Proposed procedures	Summary of change / impacts
ARA + VFR	RNP 134	New IFR approaches to maintain safety and accessibility via PinS procedures for K13-A, anticipating the future situation with nearby wind farms. No change to environmental impact.
	RNP 314 (approach)	
	RNP Z 226 (approach)	

The procedure designs have been developed in accordance with ICAO and EASA regulations, particularly PANS-OPS and EU AIR OPS. Compliance and any deviations for the individual designs are documented in the associated design reports (see Section 5.6 List of Supplementary documents).

In line with ICAO DOC 9906 (Flight Procedure Design Quality Manual), the release of new flight procedure publications has been subject to a validation process. This process has been conducted as an independent activity.

5.2. Regulations, Policies and Harmonisation

No changes have been identified to applicable regulations or policies.

No amendments or additional Letters of Agreement (LoAs) are required.

Note: While it is assumed that the procedures will be published in the Dutch AIP with a textual cross-reference in the UK AIP, **the UK CAA will ultimately determine how these procedures are to be reflected in the UK AIP.**

5.3. Operational Impacts

Air Navigation Service Providers (ANSP)

This change will be implemented in North Sea Area V, where Air Traffic Service (ATS) provision is delegated by the UK to the Netherlands, with LVNL as the ANSP.

The offshore PinS approach and departure procedures will be carried out in Class G airspace, monitored by Amsterdam FIC (Amsterdam Info). Apart from modified flight trajectories during PinS procedures, the monitoring of these operations and RTF air–ground communication is not expected to change.
Discussions with LVNL confirmed that no changes are required to the FIC controller's working methods.

Military Airspace Users

No impacts are anticipated.

Commercial Airspace Users to/from K13A

Maintaining operational continuity and flight planning efficiency may require avionics upgrades, as well as crew training and regulatory approval.
Specific operational considerations are addressed in the associated CONOPS (see para 5.6 item 2)

Other Airspace Users

The impact on other (non-K13-A) airspace users is negligible.

Airport operator (K13-A)
The identified platform requirements are already met by existing offshore helidecks. For the introduction of PinS procedures with a "proceed VFR" visual segment, no additional obstacle requirements are necessary.

In the anticipated future environment with nearby wind farms, the PinS procedures will enable efficient and predictable access, limiting operational delays and associated costs.

5.4. Safety
A safety assessment for the offshore PinS operations to EHJR / K13-A was conducted through a series of workshops and subsequent discussions with subject matter experts.

All identified risks associated with the PinS approaches can be mitigated to acceptable and tolerable levels (ALARP).
(See para 5.6 for list of separately supplied documents.)

5.5. Environment
No changes are anticipated in terms of traffic capacity, and the number of helicopter movements to and from the K13-A platform (EHJR) will remain unchanged.

While the actual flight tracks following PinS procedures (close to the platforms) will differ from current offshore VFR and ARA procedures, there will be no changes in overflight of densely populated areas.

Consequently, there are no expected changes in emissions or community noise, and no direct environmental impacts on populated areas. The K13-A location is approximately 50 NM offshore.

5.6. List of Supplementary documents
The following documents provide supporting detail on the proposed designs and are submitted to the CAA as part of this airspace change proposal. They are **commercially confidential** and will not be published on the UK CAA airspace change portal.

1. Procedure Design Document K13-A (NLR)
2. Development Offshore PinS K13-A, Concept of Operations (CONOPS) for offshore Point-in-Space procedures in the North Sea Area (NLR)
3. K13-A PinS approach and departure procedure designs and documentation (Skyguide)
4. Offshore PinS compliance overview (NLR)
5. NLR-CR-2025-318, Offshore PinS Safety Assessment
6. K13-A Flight Validation report 2.0 (PVS)
7. K13-A FVP expanded report (analysis, recommendations and future developments, (draft)

Note: The documentation package also contains material related to other design proposals that are not being implemented under this ACP at this time (specifically the K13-A PinS departures) or that are not relevant from a UK perspective (specifically the PinS G14-A and PinS G17-A). These will not be published on the UK CAA airspace change portal.