

CAA Operational Assessment

Title of airspace change proposal	Alignment with Dutch changes to K13A procedures in North Sea Area V
Change sponsor	NATS (On behalf of NL Ministry of Infrastructure and Water Management, Directorate-General for Civil Aviation and Maritime Affairs)
Project reference	ACP-2025-009
Account Manager	[REDACTED]
Case study commencement date	9 Sep 25
Case study report as at	10 Sep 25

Instructions

In providing a response for each question, please ensure that the 'status' column is completed using the following options:

- YES
- NO
- PARTIALLY
- N/A

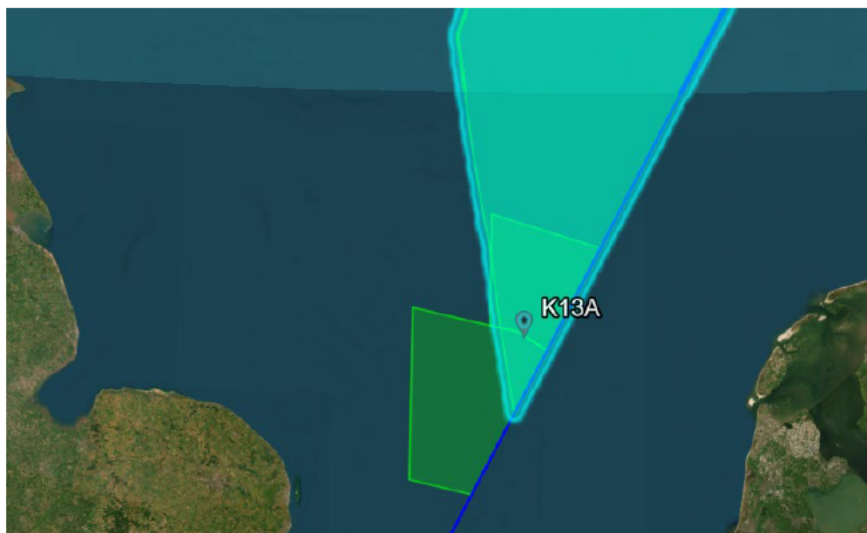
To aid the SARG Lead it may be useful that each question is also highlighted accordingly to illustrate what is:

resolved YES not resolved PARTIALLY not compliant NO

Executive Summary

This proposal concerns helicopter PinS flight procedures to the K13-A platform, located within the Netherlands (NL) Exclusive Economic Zone but in airspace that forms part of the London FIR, where ATS provision is delegated to NL. The NL Ministry of Infrastructure and Water Management is working in coordination with NERL, who acting as the sponsor for this airspace change for UK elements.

Several large offshore wind farms are planned in the vicinity of the K13-A platform (including Nederwiek I and II/III) on the NL side and Norfolk Boreas on the UK side, with wind turbine tip heights of up to 1,000 ft. Under 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 NL Ministry of Infrastructure and Water Management, sponsored by the NL Ministry of Climate and Green Growth, is implementing PinS 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.	Justification for change and options analysis (operational/technical)	Status
1.1	Is the explanation of the proposed change clear and understood?	YES
	To maintain safe and reliable helicopter access to K13-A in a future environment with wind farms, the NL Ministry of Infrastructure and Water Management, sponsored by the NL Ministry of Climate and Green Growth, is implementing PinS 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.	
1.2	Are the reasons for the change stated and acceptable?	YES
	Several large offshore wind farms are planned in the vicinity of the K13-A platform (including Nederwiek I and II/III) on the NL side and Norfolk Boreas on the UK side, with wind turbine tip heights of up to 1,000 ft. Under IMC, helicopter access to K13-A relies on ARA procedures. These require a wide obstacle-free area around the platform, which is incompatible with the planned wind farm layouts.	
1.3	Have all appropriate alternative options been considered, including the 'do nothing' option?	N/A
	The development of the options has taken place within the NL element of the project. The UK assessment of the proposal is to ensure that any impacts on UK interests are adequately considered, and that there are no conflicts with UK regulations or policies. There is also a requirement to consider a coordinated implementation of changes.	
1.4	Is the justification for the selection of the proposed option sound and acceptable?	N/A
	See 1.3.	

2.	Airspace description and operational arrangements	Status
2.1	Is the type of proposed airspace design clearly stated and understood?	YES
	<p>The proposal introduces new PinS procedures with a 'proceed VFR' segment to the K13-A platform:</p> <p>PinS APCH DIR 314, LNAV + LPV minima</p> <p>PinS APCH DIR 134, LNAV + LPV minima</p> <p>PinS APCH DIR 226, LNAV minima, turn at MAPt (right turn)</p> <p>PinS APCH DIR 226, LPV minima, turn after MAPt (left turn)</p>	
2.2	Are the hours of operation of the airspace and any seasonal variations stated and acceptable?	N/A
	No anticipated changes to current use.	
2.3	Is any interaction with adjacent domestic and international airspace structures stated and acceptable including an explanation of how connectivity is to be achieved? Has the agreement of adjacent States been secured in respect of High Seas airspace changes?	YES
	<p>This proposal only accounts for changes in UK airspace over the High Seas; there are no changes to the volume of airspace where the provision ATS is delegated the NL, nor to any other supporting airspace objects. Within the broader project, there are other airspace design changes taking place in High Seas, but these are occurring within the Amsterdam FIR and are not considered within this UK assessment.</p> <p>CAA ACTION: The UK CAA will propose to the NL Ministry of Infrastructure and Water Management, Directorate-General for Civil Aviation and Maritime Affairs, that all changes are notified by them to ICAO in a single High Seas notification letter.</p>	
2.4	Is the supporting statistical evidence relevant and acceptable?	YES
	There are no anticipated changes to the number of aircraft movements as a result of this change, or any significant deviations from current aircraft behaviours. The planning assumption is based on one helicopter movement a day to/from K13-A.	

2.5	Is the analysis of the impact of the traffic mix on complexity and workload of operations complete and satisfactory?	YES
	There are no anticipated changes to the number of aircraft movements as a result of this change, or any significant deviations from current aircraft behaviours. The provision of ATS by NL is unchanged.	
2.6	Are any draft Letters of Agreement and/or Memoranda of Understanding included and, if so, do they contain the commitments to resolve ATS procedures (ATSD) and airspace management requirements?	N/A
	There are no airspace changes requiring updates to LOAs where the UK is a signatory.	
2.7	Should there be any other aviation activity (low flying, gliding, parachuting, microlight site etc) in the vicinity of the new airspace structure and no suitable operating agreements or ATC Procedures can be devised, what action has the change sponsor carried out to resolve any conflicting interests?	N/A
	The site is ~50nm from the NL mainland and ~65nm from the UK mainland – there are no anticipated changes to airspace use.	
2.8	Is the evidence that the airspace design is compliant with ICAO SARPs, airspace design & FUA regulations, and Eurocontrol guidance satisfactory?	YES
	<p>The sponsor has provided technical documentation to the CAA from the NL project team showing how the procedures have been developed. These do not form part of the UK element of the proposal as the technical aspects of the PinS designs are a matter for the NL; however, this document set includes a Doc8168 compliance matrix. Other than the introduction of new procedures, there are no other changes affecting the airspace design in UK airspace. The procedures will be published in the Netherlands AIP, with the UK CAA determining suitable updates to the UK AIP to cross-refer to the NL AIP.</p> <p>CAA ACTION: The UK CAA will introduce a textual update to the description of Area V in the UK AIP ENR 2.2 to make it clear that details of procedures are described in the NL AIP.</p>	

2.9	Is the proposed airspace classification stated and justification for that classification acceptable?	YES
	No change, remains Class G in Area V where the provision of ATS is delegated to NL.	
2.10	Within the constraints of safety and efficiency, does the airspace classification permit access to as many classes of user as practicable?	YES
	No change, remains Class G in Area V where the provision of ATS is delegated to NL.	
2.11	Is there assurance, as far as practicable, against unauthorised incursions? (This is usually done through the classification and promulgation.)	YES
	No change, remains Class G in Area V where the provision of ATS is delegated to NL. This is High Seas airspace where commercial offshore operations are undertaken by operators approved by NL. The full airspace design and procedures are published in the NL AIP; the UK notifies Area V in the UK AIP ENR 2.2 (also see 2.8). As this is High Seas airspace, there are no restrictions made on other airspace users acting in accordance with ICAO principles for the freedom of flight.	
2.12	Is there a commitment to allow access to all airspace users seeking a transit through controlled airspace as per the classification, or in the event of such a request being denied, a service around the affected area?	N/A
	See 2.11.	
2.13	Are appropriate arrangements for transiting aircraft in place in accordance with stated commitments?	N/A
	See 2.11.	

2.14	Are any airspace user group's requirements not met?	N/A
	See 2.7 and 2.11.	
2.15	Is any delegation of ATS justified and acceptable? (If yes, refer to Delegated ATS Procedure).	YES
	No change.	
2.16	Is the airspace design of sufficient dimensions with regard to expected aircraft navigation performance and manoeuvrability to contain horizontal and vertical flight activity (including holding patterns) and associated protected areas in both radar and non-radar environments?	N/A
	See 2.8 and 2.11.	
2.17	Have all safety buffer requirements (or mitigation of these) been identified and described satisfactorily (to be in accordance with the agreed parameters or show acceptable mitigation)? (Refer to buffer policy letter.)	N/A
	See 2.8 and 2.11.	
2.18	Do ATC procedures ensure the maintenance of prescribed separation between traffic inside a new airspace structure and traffic within existing adjacent or other new airspace structures?	N/A
	See 2.8 and 2.11.	

2.19	Is the airspace structure designed to ensure that adequate and appropriate terrain clearance can be readily applied within and adjacent to the proposed airspace?	YES
	See 2.8, further, the procedures are based on EGNOS LPV and LNAV minima, using GNSS guidance and radio altimetry to safe operations within the required obstacle clearance area.	
2.20	If the new structure lies close to another airspace structure or overlaps an associated airspace structure, have appropriate operating arrangements been agreed?	N/A
	See 2.8 and 2.11.	
2.21	Where terminal and en-route structures adjoin, is the effective integration of departure and arrival routes achieved?	N/A
	See 2.8 and 2.11.	

3.	Supporting resources and communications, navigation and surveillance(CNS) infrastructure	Status
3.1	Is the evidence of supporting CNS infrastructure together with availability and contingency procedures complete and acceptable? The following are to be satisfied:	YES
	<ul style="list-style-type: none"> • Communication: Is the evidence of communications infrastructure including RT coverage together with availability and contingency procedures complete and acceptable? Has this frequency been agreed with AAA Infrastructure? 	YES
	No change.	
	<ul style="list-style-type: none"> • Navigation: Is there sufficient accurate navigational guidance based on in-line VOR or NDB or by approved RNAV-derived sources, to contain the aircraft within the route to the published RNP value in accordance with ICAO/ Eurocontrol standards? For example, for nav aids, has coverage assessment been made, such as a DEMETER report, and if so, is it satisfactory? 	YES
	The procedures are based on EGNOS LPV and LNAV minima. The NL technical assessment documents describe the validation procedures and outcomes. Whilst the UK currently does not have access to EGNOS, this does not relate to the geographical limitations – the UK CAA considers that EGNOS can be used in UK airspace for non-UK operations, such as by NL operators in High Seas airspace where the provision of ATS has been delegated. The UK CAA provided comments on the NL responses to an ESSP questionnaire relating to the international arrangements for Area V, and the ESSP has confirmed that the use of EGNOS in Area V can be added to the existing agreement with LVNL.	
	<ul style="list-style-type: none"> • Surveillance: Radar provision – have radar diagrams been provided, and do they show that the ATS route/airspace structure can be supported? 	YES
3.2	Where appropriate, are there any indications of the resources to be applied, or a commitment to provide them, in line with current forecast traffic growth acceptable?	YES
	No change.	

4.	Maps/charts/diagrams	Status
4.1	<p>Is a diagram of the proposed airspace included in the proposal, clearly showing the dimensions and WGS84 co-ordinates?</p> <p>(We would expect sponsors to include clear maps and diagrams of the proposed airspace structure(s) – they do not have to accord with aeronautical cartographical standards (see airspace change guidance), rather they should be clear and unambiguous and reflect precisely the narrative descriptions of the proposals.)</p>	N/A
	<p>Charts of the current airspace design are provided showing the location and supporting airspace that is not changing. Sufficient technical information is provided in the UK submission to understand the nature of the change – the main technical information and coordinates etc are within the NL submission – the UK AIP will not be used to publish this information, so ADQ aspects are not a matter for the UK.</p>	
4.2	Do the charts clearly indicate the proposed airspace change?	N/A
	See 4.1.	
4.3	Has the change sponsor identified AIP pages affected by the change proposal and provided a draft amendment?	N/A
	There are no technical changes to the UK AIP – the UK CAA will supplement the Area V description in ENR 2.2 with a cross-reference to the NL AIP.	
4.4	Has the change sponsor completed the WGS84 spreadsheet and submitted to the CAA for approval?	N/A
	See 4.1.	

5.	Operational impact	Status
5.1	Is the change sponsor's analysis of the impact of the change on all airspace users, airfields and traffic levels, and evidence of mitigation of the effects of the change on any of these, complete and satisfactory? Consideration should be given to:	YES
	a) Impact on IFR General Aviation traffic, on Operational air traffic or on VFR General Aviation traffic flow in or through the area.	
	No change.	
	b) Impact on VFR Routes.	
	No change.	
	c) Consequential effects on procedures and capacity, i.e. on SIDs, STARs, holds. Details of existing or planned routes and holds.	
	No change.	
	d) Impact on airfields and other specific activities within or adjacent to the proposed airspace.	
	No change.	
	e) Any flight planning restrictions and/ or route requirements.	
	No change.	

5.2	Does the change sponsor consultation material reflect the likely operational impact of the change?	
	No change.	

Case study conclusions – to be completed by Airspace Regulator (Technical)	Yes/No
Has the change sponsor met the SARG airspace change proposal requirements and airspace regulatory requirements above?	YES
The submission is proportionate to the extent of the change and anticipated impacts, addressing the UK aspects of this airspace change being developed by NL.	

RECOMMENDATIONS/CONDITIONS/PIR DATA REQUIREMENTS	Yes/No
Are there any Recommendations which the change sponsor <u>should try</u> to address either before or after implementation (if approved)? If yes, please list them below.	NO
<u>GUIDANCE NOTE:</u> Recommendations are something that the change sponsor <u>should try</u> to address either before or after implementation, if indeed the airspace change proposal is approved. They may relate to an area in which the change sponsor is reliant upon a third party to actually come to an agreement and consequently they do not carry the same 'weight' as a Condition.	
Are there any Condition(s) which the change sponsor <u>must fulfil</u> either before or after implementation (if approved)? If yes, please list them below.	NO
<u>GUIDANCE NOTE:</u> Conditions are something that the change sponsor <u>must fulfil</u> either before or after implementation, if indeed the airspace change proposal is approved. If their proposal is approved, change sponsors <u>must observe</u> any condition(s) contained within the regulatory decision; failure to do so <u>will usually</u> result in the approval being revoked. Conditions should specify the consequence of failing to meet that condition, whether that be revoking the ACP or some alternative.	

Are there any specific requirements in terms of the data to be collected by the change sponsor for the Post Implementation Review (if approved)? If yes, please list them below.	N/A
<p><i>GUIDANCE NOTE:</i> PIR data requirements concerns any specific data which the change sponsor <i>must</i> collate post-implementation, if indeed the airspace change proposal is approved. Please use this section to list any such requirements so that they can be captured in the regulatory decision accordingly.</p> <p>The Airspace Regulator (Technical) does not consider that there is a need for a PIR.</p>	

General summary
Whilst this proposal introduces new PinS procedures to UK airspace, they are required to meet the requirements of NL operations. This NERL proposal adequately takes account of the UK interests in this matter, namely to ensure suitable consideration of UK regulations and policies (eg AMS and TA2000 Sec 70), that there are no anticipated detrimental impacts on UK activities or the MOD, and that implementation is coordinated appropriately.

Comments and observations
<p>CAA ACTIONS:</p> <p>The UK CAA will propose to the NL Ministry of Infrastructure and Water Management, Directorate-General for Civil Aviation and Maritime Affairs, that all changes are notified by them to ICAO in a single High Seas notification letter.</p> <p>The UK CAA will introduce a textual update to the description of Area V in the UK AIP ENR 2.2 to make it clear that details of procedures are described in the NL AIP.</p>

Operational assessment sign-off	Name	Signature	Date
Operational assessment completed by Airspace Regulator (Technical)	[REDACTED]	[REDACTED]	10 Sep 25
Principal Airspace Regulator comment / Decision	Name	Signature	Date
Operational assessment conclusions approved by Principal Airspace Regulator	[REDACTED]	[REDACTED]	18 Sep 25
<p>Principal Airspace Regulator Comments and Decision:</p> <p>Noting the comments above, this ACP is approved.</p>			