

# Northern LTMA Region Airspace Change (OFJES, CLN CTA11/12, FL105+)



Stage 5 CAA-requested clarifications  
ACP-2025-023

<b>1. Introduction</b>	<b>2</b>
<b>2. Airspace access</b>	<b>2</b>
<b>3. Stakeholder Feedback follow on actions</b>	<b>4</b>
3.1 Cambridge City Airport	4
3.2 Duxford re: impact on aerobatics	4
<b>4. Conclusion</b>	<b>5</b>
<b>Appendix A: British Aerobatics feedback</b>	<b>6</b>

# 1. Introduction

1.1.1 This standalone document is a part of the ACP submission for ACP-2025-023 Northern LTMA Region Airspace Change (OFJES, CLN CTA11/12, FL105+) and must be read in conjunction with the other material.

1.1.2 It provides evidence to satisfy the post-submission CAA requests for additional clarifications regarding queries identified during the assessment, as per emails received from the week commencing 27/10/2025, extracts of which are below:

**First – Airspace Access.** *The Op Assessment has 2 specific questions: “is there a commitment to allow access to all airspace users seeking a transit through CAS as per the classification” and “are appropriate arrangements for transiting aircraft in place in accordance with stated commitments.”*

*Given the stakeholder feedback and airspace analysis, one could reasonably expect that requests to access the airspace by other airspace users will be low; however, I note that 2 x stakeholders commented favourably on the fact that the classification of airspace (Class C) allows for VFR traffic, which they saw as a positive (noting that traffic would need to comply with the associated airspace requirements). With this in mind, could you provide information/confirmation as to how VFR glider traffic could/would be accommodated?*

**Second – Stakeholder Feedback** follow on actions. *Although stakeholder feedback did not necessarily have an impact on the airspace design there are 2 comments where I want to understand the follow up:*

- I wanted to query what follow up actions might be in place with regards to the comment from Cambridge Airport “that it would be prudent for a review of co-ordination and handover procedures with NERL to ensure that any opportunities for improvements can be identified.”*
- I also note the comment from Duxford that the lowering of Class C airspace would have the effect of “reducing the margin of separation between them [higher performance and aerobatic] and Class C airspace.” It would be useful to know how this was being followed up/analysed.*

## 2. Airspace access

2.1.1 In Class C as proposed here, controllers are required to provide standard separation between IFR and VFR flights; for the proposed volume this would be at least 1,000ft vertically or at least 3nm laterally.

2.1.2 Regarding the CAA’s access-related questions:

- Is there a commitment to allow access to all airspace users seeking a transit through CAS as per the classification?*
- Are appropriate arrangements for transiting aircraft in place in accordance with stated commitments?*
- With this in mind, could you provide information/confirmation as to how VFR glider traffic could/would be accommodated?*

2.1.3 The hypothetical possibility of high-flying aircraft receiving a minor adverse impact under this ACP was raised by the BGA and AOPA, both national bodies. In practical terms this is extremely unlikely, borne out by radar analysis of the volume (see paragraph 2.1.5 below) and feedback from other stakeholders (see paragraphs 2.1.10 and subsection 3.2 below).

2.1.4 A transit request could come via phone from an adjacent radar-based ATS unit with whom the aircraft is in contact, or it could come directly from an aircraft in the vicinity receiving no ATS, or possibly via London FIS.

- 2.1.5 As described in the Stage 3 engagement briefing pack Slide 11, over the 12-month assessment period there was **no traffic** likely to seek a transit. All such flights in the region were aircraft joining or leaving CAS via the air route network, or were otherwise known to be receiving a radar-based ATS.
- 2.1.6 A small proportion was traffic known to be receiving a radar-based service from RAF Lakenheath, and as per engagement Slide 11, additional coordination would be required. Procedures and phone lines are in place between LTC and Lakenheath RAPCON and no additional arrangements are required.
- 2.1.7 Anecdotally from ATCO SMEs, “free-calls” to the controller from an otherwise-unknown airspace user has never happened in the nearby CAS volumes and there is no reason to expect this ACP would change that remote likelihood. Our SMEs cannot recall any instances of a FISO-relayed clearance request, which is non-radar-based.
- 2.1.8 However, in accordance with the classification, should any pilot request transit of the airspace, the controller would consider the request in context of the current traffic situation, the nature of the request itself, and the performance of the type of aircraft involved.
- 2.1.9 A clearance to transit may be issued by the controller, provided the pilot can accept the terms of that clearance. If no such clearance can be given under the evolving traffic scenario, the controller would have no choice but to instruct the aircraft to remain outside CAS until such time as a clearance may be viable, or it may be that the traffic scenario is expected to preclude a clearance for a significant period of time. This is standard for radar controllers operating in Class C, and no specific arrangements are needed to cover this scenario.
- 2.1.10 Regarding VFR glider traffic, we received responses from two of the gliding clubs in the region, Essex and Cambridge Gliding Clubs. Both were clear that this was above their normal operating level and stated there would be no impact. The BGA provided a more general response regarding Class C operations, which is considered here.
- 2.1.11 Should any glider pilot make a request to transit the Class C CAS, the same operational options apply as paras 2.1.8-2.1.9 above. No specific arrangements for gliders need to be made to cover this scenario, however controllers would need to consider that glider performance and handling characteristics are very different from powered flight.
- 2.1.12 The following is an extract from the Farnborough airspace change PIR ([ACP-2017-07 Appendix E](#)), para 2.1.8:
- Gliders, by their nature, do not have an engine; height is their ‘fuel’ and they constantly strive to gain height where possible; the moment they are not climbing, they are descending. It is difficult for gliders to accurately maintain a specific height. Gliders tend to avoid CAS because, very generally, flying in CAS in accordance with a clearance tends to dictate a predictable path at a stable altitude. Glider pilots hunt for lift, varying their path and altitude all the time, trading height for speed, and this can make adhering to an ATC clearance difficult. Gliders are also not often equipped with suitable radios. Gliders are capable of great altitudes, some are equipped with oxygen to allow flight above 10,000ft, however as per powered GA most gliders in the Farnborough region fly lower.*
- 2.1.13 The above text is true for glider operations as a whole in the UK; gliders often avoid CAS classifications above Class E because they would need a very complex clearance involving a band of transit levels, and great latitude in their transit direction. Glider pilots would take this into account when planning their flight, and controllers would also be aware.
- 2.1.14 There is no easily accessible source to find the proportion of UK gliders capable of being fitted with oxygen systems. Given that the vast majority operate below 6,000ft it is reasonable to assume that only a very small proportion of gliders would be equipped to fly within the proposed CAS volume at or above FL110. Over a recent 12-month assessment period there was **no traffic** likely to seek such a transit (see paragraph 2.1.5 above).
- 2.1.15 We consider the likelihood of an oxygen-aided glider pilot requesting a transit to be extremely remote. As stated above, should such a request occur, the controller would

consider all relevant traffic factors and glider performance in their decision-making, and the requirement to provide standard separation between VFR and IFR.

- 2.1.16 For both powered and glider VFR traffic travelling at approximately 100kt and either at or above FL110, or intending to climb into CAS, there is also the practical question of where they would go after the transit.
- Transiting north to south would bring them rapidly towards the Class A LTMA which does not permit VFR flight, requiring descent or a U-turn.
  - Transiting south to north would require them to join by climbing into the CAS for a short period, as they could not join from within the LTMA for the same reason above.
  - Transiting east to west would put them within one of the main flows of London Luton Airport arrivals which will be travelling at two or three times their speed.
  - Transiting west to east would put them head-on to the Luton flow, with a relative speed of three times their own, before they exited by descent or by leaving CAS at the new boundary near Bury St Edmunds presuming they are at FL110 or FL120.
- 2.1.17 Given the above, our SMEs determined that, in the extremely unlikely event that a high-flying GA aircraft (powered or glider) is within the region and not in contact with a radar-based ATS, they would almost certainly choose to avoid the CAS by either descending to (for example) FL100 or below, or they would stay away laterally at or above FL110.
- 2.1.18 The likelihood of requesting a clearance to enter CAS is extremely unlikely, but it would be handled as described above.

## 3. Stakeholder Feedback follow on actions

### 3.1 Cambridge City Airport

- 3.1.1 The CAA writes
- *I wanted to query what follow up actions might be in place with regards to the comment from Cambridge Airport "that it would be prudent for a review of co-ordination and handover procedures with NERL to ensure that any opportunities for improvements can be identified."*
- 3.1.2 This comment had no impact on the airspace design. Cambridge City Airport-NERL procedures are contained within the associated Letter of Agreement (LoA) and reviewed every two years, and most recently a minor update occurred in September 2025.
- 3.1.3 The implementation of this ACP is not expected to cause any changes to extant procedures. The next LoA review is due by the end of March 2026, shortly after this change is planned to be implemented. Where possible improvements are identified by either LoA party at any time, then these can be assessed and (if agreed) implemented without needing to wait for the review cycle to complete.

### 3.2 Duxford re: impact on aerobatics

- 3.2.1 The CAA writes:
- *I also note the comment from Duxford that the lowering of Class C airspace would have the effect of "reducing the margin of separation between them [higher performance and aerobatic] and Class C airspace." It would be useful to know how this was being followed up/analysed.*
- 3.2.2 The reduction in vertical distance between CAS and aerobatic aircraft was considered by ATCO SMEs as having no impact on aerobatic activities.
- 3.2.3 However, we decided to take follow-up action and contacted the British Aerobatic Association, the national body representing the UK in this sport, with expertise in training, evaluating pilots, and judging competitions.
- 3.2.4 We requested an online meeting with one of the Directors who was clear that aerobatic activities rarely take place above 5-6,000ft and this airspace change would have no impact, thus validating our SMEs' original conclusion.
- 3.2.5 A copy of the email record is included in Appendix A: British Aerobatics feedback on p.6.



## 4. Conclusion


- 4.1.1 This document summarises the CAA's requests for more details on airspace access and follow-ups on stakeholder feedback.
- 4.1.2 We contend that the information in this document is sufficient to satisfy these requests.


# Appendix A: British Aerobatics feedback


This email exchange occurred following an online meeting on Friday 31<sup>st</sup> October 2025.

[EXTERNAL] Re: Airspace change east of Cambridge, impact on aerobatics

  Fri 15:17

 You replied to this message on 31/10/2025 15:20.  
If there are problems with how this message is displayed, click here to view it in a web browser.






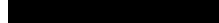
That is a very fair and accurate summary of our conversation.

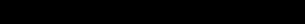
We appreciate the consultation.

Best




Director  
British Aerobatics



On Fri, 31 Oct 2025 at 15:05,  wrote:

Dear  thank you for meeting online with me this morning.

We discussed the airspace change proposal (ACP) reference ACP-2025-023, and all details/documents are available on the CAA's airspace change portal at this [link](#).



The current FL105/FL125 CAS boundary is at Newmarket, and the ACP moves it east to Bury St Edmunds.

I arranged it in response to a comment from another stakeholder that the CAA wanted to follow up; where Duxford believed the CAS change would constrain aerobatic operations.

Our discussion involved your sport. My initial expectation was that aerobatic activities were unlikely to be impacted by this change because operations approaching FL100 would require oxygen.

In your role as a director of British Aerobatics, you stated that activities rarely take place above 5-6,000ft.


Therefore, in this region where the FL105 CAS would extend eastwards, you would expect there to be no impact on aerobatic operations.


This includes your consideration of USAFE operations in the area above, which would need to remain below FL105 with a reduced "headroom" – again you did not expect this to have any impact. You also mentioned skywriting can take place higher than the typical 5-6,000ft, however you would also not expect this CAS change to impact such activities.

I trust I have fairly represented our discussion, please let me know if there's anything you'd like to add or correct.

Thanks again for the meeting.

Best wishes



  
Airspace Change Expert

End of Stage 5 CAA-requested clarifications document