

Directorate of Airspace Policy

NATMAC Representatives

13 July 2012



CAA DECISION LETTER

Dear Astley,

MANSTON KENT INTERNATIONAL AIRPORT (KIA) RNAV (GNSS) HOLD AIRSPACE CHANGE PROPOSAL

1. INTRODUCTION

1.1 During late March 2012, the Directorate of Airspace Policy received a formal airspace change proposal (ACP) from Manston KIA, on behalf of Infratil Airports (Europe) to establish a RNAV (GNSS) Hold, in conjunction with associated instrument approach procedures (IAP), in the vicinity of Manston Airport. The proposed Hold was to be based on a new position 'GOPAN', located offshore some 5nm to the north east of the aerodrome. Upon receipt of the proposal, my staff undertook a detailed analysis of the operational requirements, the environmental assessments and the consultation process. The purpose of this letter is to provide you with an overview of the proposal and my related decision.

2. PROPOSAL OVERVIEW

2.1 Manston's existing IAPs are dependent upon land based navigation facilities. The ACP is based on the case that, subject to appropriate licensing and aircraft equipment fit, operators utilising Manston Airport are increasingly able to fly RNAV approaches. The development and introduction of satellite- based approaches at Manston corresponds with the expected medium/long-term development of the UK Airspace¹. The provision of the RNAV Hold and Approaches, with the later introduction of V-NAV Approaches, will ensure that Manston Procedures are coherent with the Future Airspace Strategy, specifically with regard to:

- Development and implementation of Performance-based Navigation (PBN) in UK airspace aligned with UK/Ireland Functional Airspace Block airspace aspirations, utilising P-RNAV and progressing to Advanced Required Navigational Performance (A-RNP);
- Reduced reliance on ground-based navigation aids and move to space-based navigation capability;
- Facilitating the use of Required Navigation Performance (RNP) Approach (APCH) functions for UK airport arrival procedures;
- Development of the future requirements for Precision Approach Landing.

¹ As set out in the Future Airspace Strategy (FAS) documentation.

- 2.2 The development of the GOPAN Hold (with supporting IAPs) will help the Aerodrome Licence Holder address, to some degree, two of the national and local environmental issues associated with airport development, namely Noise and Emissions.
- 2.3 The design and proposed introduction of the proposed GOPAN Hold (a regular shaped, standard, left-hand, one minute IFR Hold with a base altitude of 3000ft amsl) has been validated by CAA Procedures Design Team and GNSS Technical Adviser. SRG AATSD has endorsed the Safety Case for the related IAPs. The GOPAN Hold will be annotated on relevant VFR Charts. Associated Instrument Approach Charts will be published within the Manston AIP entry.

3. STATUTORY DUTIES

- 3.1 My statutory duties are set out in Section 70 of the Transport Act 2000 (the Act), the CAA (Air Navigation) Directions 2001, as varied in 2004 (the Directions), and Guidance to the CAA on Environmental Objectives relating to the exercise of its air navigation functions.²

3.2 Safety

- 3.2.1 My primary duty is to maintain a high standard of safety in the provision of air traffic services and this takes primacy over all other duties.³ In this respect, the GOPAN Hold airspace is not currently greatly utilised by military or VFR traffic other than 'known' VFR traffic predominantly receiving a *Manston Radar*-provided ATS. The related DAP operational assessment, ACP consultation and the Safety Case analysis each identified no overriding safety issue that might be generated by the introduction of the GOPAN Hold and associated procedures.
- 3.2.2 I am consequently content that the proposed establishment of the GOPAN Hold (with associated procedures) can be safely implemented.

3.3 Airspace Efficiency

- 3.3.1 I am required to secure the most efficient use of the airspace consistent with the safe operation of aircraft and the expeditious flow of air traffic.⁴ I am satisfied that the Hold and procedure design fits the minimum necessary to ensure the maintenance of a safe operating environment.
- 3.3.2 The ACP recognises the need for efficient use of the airspace by all airspace users and is cognisant of the restrictions imposed by adjacent CAS. The proposal is appropriate to facilitate full instrument approach capability to Runway 10/28 at the Airport, and implementation of the proposed changes (moving the majority of future IFR holding traffic from the aerodrome overhead to offshore) would be unlikely to have a noticeable impact in controller or pilot workload.

² Issued in 2002 by the DfT (then called the Department of Transport, Local Government and the Regions) (the Guidance).

³ Transport Act 2000, Section 70(1).

⁴ Transport Act 2000, Section 70(2)(a).

3.4 Airspace Users

- 3.4.1 I am required to satisfy the requirements of operators and owners of all classes of aircraft.⁵ The Sponsor conducted extensive consultation with all affected aviation stakeholder groups as part of the ACP process and the impact of the proposed Hold and associated procedures on other airspace users has been appropriately considered. NATMAC members have been informed by DAP at each stage of the ACP process.
- 3.4.3 The proposed establishment of the GOPAN Hold will have a clear benefit to inbound IFR air traffic. Given the limited background usage of associated airspace and Manston's continued provision of ATS to local traffic, I am satisfied that the establishment of the GOPAN Hold and associated procedures will place no material restriction on other airspace users.

3.5 Interests of Other Parties

- 3.5.1 I am required to take account of the interests of any person (other than an owner or operator of an aircraft) in relation to the use of any particular airspace or the use of airspace generally.⁶ Given the offshore location of the proposed Hold, I am content that the interests of non-aviation parties will not be adversely affected by the establishment of the GOPAN Hold.

3.6 Environmental Objectives

- 3.6.1 In performing my statutory duties, I am obliged to take account of the Guidance provided by the Secretary of State⁷. My detailed considerations of the environmental aspects of this proposal are covered at section 4 of this letter.

3.7 Integrated Operation of ATS

- 3.7.1 I am required to facilitate the integrated operation of air traffic services provided by or on behalf of the Armed Forces of the Crown and other air traffic services.⁸ No such ATS integration issues have been identified.

3.8 National Security

- 3.8.1 I am required to take into account the impact any airspace change may have upon matters of national security.⁹ No such national security issues have been identified; I am therefore satisfied that national security requirements would not be jeopardised by implementation of the change.

3.9 International Obligations

- 3.9.1 I am required to take into account any international obligations entered into by the UK and notified by the Secretary of State.¹⁰ No new international obligations arise as a result of the airspace change proposal. The new airspace has been designed in accordance with national regulatory requirements. The establishment of the GOPAN

⁵ Transport Act 2000, Section 70(2)(b).

⁶ Transport Act 2000, Section 70(2)(c).

⁷ Transport Act 2000, Section 70(2)(d).

⁸ Transport Act 2000, Section 70(2)(e).

⁹ Transport Act 2000, Section 70(2)(f).

¹⁰ Transport Act 2000, Section 70(2)(g).

Hold and associated procedures would contribute to the UK's overall compliance with ICAO Assembly Resolution (A37-11) which expects States to have PBN compliant runway precision approaches by 2016.

4. ENVIRONMENTAL CONSIDERATIONS

4.1 Highlighting that the rationale for the proposed establishment of the GOPAN Hold is not specifically related to improving the environmental impact of aviation, the associated Environmental Research and Consultancy Department (ERCD) report records that it is reasonable to conclude that the establishment of the Hold is likely to have a net environmental benefit. ERCD recorded that a lack of statistical information relating to existing hold utilisation, the unpredictable nature of operations within Class G airspace and a degree of uncertainty regarding future traffic volumes at the Airport, combined to have made environmental assessment difficult. That said, the Sponsor's environmental assessment responsibilities have been met to the extent that had been possible.

4.2 The ERCD report highlighted that in establishing the GOPAN Hold:

- A noise benefit was likely to accrue through holding RNAV (GNSS) compliant aircraft offshore as opposed to in the Airport overhead; albeit some traffic routeing to the Hold from the south would be expected to cross the Kent coast in the vicinity of Margate, typically at and above 6,000ft altitude¹¹.
- Whilst some aircraft routeing to the Hold might have to fly additional miles, this is likely to be balanced by an expectation that other aircraft would have shorter routeings. Conservative estimates concluded that net CO₂ emissions will be no worse than is currently the case.
- There will be no associated overflight of any AONB or National Park.

4.3 It is considered that there is no requirement to obtain further approval from the Secretary of State for Transport in respect of the environmental impact of this proposal.

5. CONSULTATION

5.1 Allowing for the Christmas and New Year break, the Sponsor undertook a 14-week long aviation stakeholder consultation between 7 November 2011 and 13 February 2012¹². The consultation document was distributed to 83 stakeholder organisations/individuals. The document was also lodged on the KIA website.

5.2 The assessment of the proposal by DAP's Airspace Policy Coordination & Consultation section noted that the consultation generated a very high response rate (48 respondees / 58%). Of all of those consulted (including those that did not respond), 16 consultees (19%) supported the proposal and 32 consultees (39%) had no objection / comment; no consultee objected to the proposal. Any issues raised were appropriately addressed by the ACP Sponsor.

¹¹ ERCD assess that at 6,000ft aircraft could still be audible though are unlikely to generate a noise level (or occur often enough) to cause significant community annoyance.

¹² In line with the Cabinet Office Code of Practice for Consultation, the airspace change processes requires a minimum consultation period of 12 weeks.

5.3 The Consultation Assessment records that this was a well run consultation and that the sponsor was very proactive. The consultation material was of a good standard and accurately portrayed the impact of the proposal.

6. REGULATORY DECISIONS

6.1 I am content that the establishment of the GOPAN RNAV (GNSS) Hold and associated IAPs will be safe, thus satisfying my primary statutory duty. Thereafter, when considering the competing demands of my remaining duties, together with the Directions and Guidance, I am also satisfied that the establishment of the Hold and associated procedures in the vicinity of Manston Airport will be appropriate. I am content that the ACP Sponsor has conducted a well-run and proactive consultation, taken account of responses and developed a proposal which appropriately balances the needs of the airport and all airspace users.

6.2 Accordingly, the GOPAN RNAV (GNSS) Hold will be formally established on 10 January 2013 (AIRAC 1/2013). My staff will review the effectiveness of the arrangements 12 months after introduction and the results of this review will be published. NATMAC members may wish to contribute observations to the review process and will be advised of the details nearer the time.

Yours sincerely,

Mark Swan

Mark Swan
Director