

## Safety and Airspace Regulation Group

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Airspace Change Proposal - Operational Assessment

Version: 1.1/ 2019

<b>Title of Airspace Change Proposal</b>	<b>RNP Instrument Approach Procedures at Sherburn-in-Elmet Aerodrome</b>
<b>Change Sponsor</b>	<b>Sherburn Aero Club Ltd (SAC)</b>
<b>SARG Project Leader</b>	<b>[REDACTED]</b>
<b>Case Study commencement date</b>	<b>27/09/21</b>
<b>Case Study report as at</b>	<b>28/02/23</b>
<b>File Reference</b>	<b>ACP-2015-04</b>

### 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 Project Leader's efficient Project Management it may be useful that each question is also highlighted accordingly to illustrate what is:

resolved  **not resolved**  **not compliant**  as part of the AR Project Leader's efficient project management.

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1.	Justification for change and “Option Analysis”	Status
1.1	<p><b>Is the explanation of the proposed change clear and understood?</b></p> <p>Required Navigation Performance (RNP) Instrument Approach Procedures (IAPs and Missed Approach Procedures, MAPs) to Sherburn-in-Elmet Airfield (EGCJ) runways 28 and 10, with no approach control service and no associated controlled airspace (CAS) to contain the procedures. The procedures are being proposed to allow for a suitably equipped aircraft (CAT A-B) to recover to EGCJ when the met conditions would preclude a visual recovery. In order to ensure the procedures are flown safely, there will be a requirement for training to be done on the procedures, which may be carried out in VMC<sup>1</sup> under instrument flight rules (IFR). The Sponsor has elected not to include a hold, with an explanation in the safety case v3.</p>	YES
1.2	<p><b>Are the reasons for the change stated and acceptable?</b></p> <p>In accordance with UK government policy on the implementation of these types of procedure. <i>‘The IAPS are intended to provide increased safety and operational resilience during poor weather and are consistent with wider Government policy to support the introduction of more RNP IAPs at GA aerodromes and support the ongoing viability of GA aerodromes’</i> (ACP Mar.21, para 2). The Sponsor also decided to request the changes in order to take advantage of funding that was available at the time (European funding and a grant from the GSA). The proposed RNP IAPs will afford suitably equipped aircraft and in-scope pilots with a defined and systemised procedure to recover to EGCJ. Without an Approach Control Service (ACS) or the increased air traffic awareness derived from operating in controlled airspace (CAS), the IAP only provides assurance that, if flown correctly, the aircraft will be terrain safe down to an altitude that should allow the pilot to acquire the runway visually and land safely. The IAPs, in isolation, do not afford any mitigation to the risk of a mid-air collision (MAC) as they will be notified in Class G airspace. Aircraft operators (AOs) may elect to fly the IAPs in VMC for training purposes. The Sponsor will ensure that a pilot who elects to fly the RWY28 procedure is informed of gliding activity, prior to commencing the procedure. Should there be local gliding that would constitute a hazard, such as launching multiple gliders from Burn, while operating on RWY28, it is expected that the sponsor will suspend the procedure. The IAPs can only be utilised if a slot is booked (PPR) and the pilot accepts that they are flying in accordance with the rules of the air in Class G airspace. The ability of the IAPs to reduce the risks associated with recovering to EGCJ in IMC, is the reason for the change.</p>	YES
1.3	<p><b>Have all appropriate alternative options been considered, including the ‘do nothing’ option?</b></p> <p>There is only one accepted option for this proposal, that has been ongoing since 2015 and that is to introduce RNP IAPs (no hold required), without an approach control service, at EGCJ. The CAA accepts that despite this ACP commencing under the CAP725 process, it is proportionate to apply current methodology in terms of assessing the potential impacts of this proposal as described under Part 1c of CAP1616. Therefore, the CAA accepts that there</p>	YES

<sup>1</sup> See [Skybrary definition](#)

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	is no requirement to consider the 'do-nothing' option and that following engagement, the proposed options to each runway are a proportionate response to the statement of need. The selected option also aligns with the CAA's current process under CAP1616 Part 1c.	
<b>1.4</b>	<p><b>Is the justification for the selection of the proposed option sound and acceptable?</b></p> <p>'The IAPs are intended to provide increased safety<sup>2</sup> and operational resilience during periods of poor weather and are consistent with wider Government policy to support the introduction of more RNP IAPs at GA aerodromes and support the ongoing viability of GA aerodromes.' (ACP Mar.21, para 2) By selecting one approach to each of the (tarmac) runways, the Sponsor is proposing the minimum airspace design to address the requirement stated. The Sponsor also highlights that the changes in technology and the resultant reduction in costs has meant that it is justifiable for them to submit the ACP. The designs have been developed and amended due to feed-back during engagement with relevant stakeholders and as a result of this, the justification for one GNSS IAP to each runway is sound and acceptable.</p> <p>The Sponsor provides 4 reasons for not including a hold in the IAP design (Safety Case v.3, s.7), a lack of a suitable location, a hold would serve no purpose for traffic flow management and integration, a hold would be of limited use in the event of poorer than forecast weather, a hold would be of limited use in the event of unforeseen circumstances.</p> <p>The CAA recognises that a hold, as part of an IAP, should provide a safe area within airspace for a pilot to safely manage their aircraft due to unforeseen circumstances. The CAA accepts the Sponsors case for not including a hold, given the nature of the operations at EGJ; it would not be proportionate to require a hold and one would not be needed to mitigate against the risk of unforeseen circumstances. The Missed Approach Procedure will afford a safe route on which to climb, and it would be expected that the pilot would opt to divert to another airfield if the rwy at EGJ was unavailable.</p>	<b>YES</b>

<b>2.</b>	<b>Airspace Description and Operational Arrangements</b>	<b>Status</b>
<b>2.1</b>	<p><b>Is the type of proposed airspace clearly stated and understood?</b></p> <p>There is no new airspace proposed by the Sponsor. The proposal is for new GNSS IAPs for an airport without an Approach Control Service.</p>	<b>YES</b>
<b>2.2</b>	<p><b>Are the hours of operation of the airspace and any seasonal variations stated and acceptable?</b></p> <p>In line with airport opening hours see EGJ AD 2.3 (0900-SS 0800-1800).</p>	<b>YES</b>
<b>2.3</b>	<p><b>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?</b></p>	<b>N/A</b>

<sup>2</sup> For the aircraft flying the procedure when compared to recovering to the airfield without the procedure.

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	No international or High Seas aspects. No identified connectivity with en route domestic structures.	
<b>2.4</b>	<b>Is the supporting statistical evidence relevant and acceptable?</b>	<b>YES</b>
	The ACP (Mar 22), page 5 states that there were approximately 29,000 mvts in 2021, which were curtailed by Covid and should have been 34,400. The forecast suggests that the EGCJ will return to their pre-covid movements of 35,000 <sup>3</sup> by 2024. This figure is not evidenced as comparable to other similar sized airfields <sup>4</sup> . These projections show that traffic levels are recovering. The table (page 5 ACP Mar 22) suggests an average of 2.0 aircraft a day will use the IAP 2022-2024, which is accepted as low, given the forecast total average number of arrivals a day is 47. The Sponsor has forecast the IAPs will generate an annual 1.5% increase in movements, if EGCJ reaches its pre-covid traffic levels of 35,000 movements annually.	
<b>2.5</b>	<b>Is the analysis of the impact of the traffic mix on complexity and workload of operations complete and satisfactory?</b>	<b>YES</b>
	The Sponsor states that <i>'it is not the intention of SAC to change the core (VFR) flying activities currently taking place. The IAP would be there to provide operational resilience and safety to the limited recreational and business users of the aerodrome who sometimes operate under IFR in and out of the aerodrome, often to destinations outside the UK.'</i> The analysis of the forecast growth in traffic as a result of the introduction of the IAPs shows that there will be an increase in workload and complexity for the AGCS Officer based on them carrying out new tasks, described in the sponsors documentation. The CAA accepts that this proposal will increase the workload of operations due to the introduction of the IFP slot booking system, however, this has been considered by the Sponsor and is integral to the proposal. The traffic mix will change, as a result of aircraft being able to attempt a recovery in IMC. The Sponsor must provide suitable training for the AGCS/Os and ensure that pilots utilising the IAPs understand their responsibilities.  The CAA considered the information in the AAIB records and noted 5 relevant CAT B and 2 CAT C incidents (1 Feb 00 31 Jan 21) within the area relevant to EGCJ. The CAA noted the information presented at the Workshop <sup>5</sup> by the local gliding community regarding the use of the class G airspace in the local area.	
<b>2.6</b>	<b>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?</b>	<b>YES</b>

<sup>3</sup> The Nov 21 ACP page 6.

<sup>4</sup> For comparison Oxford Kidlington airport had 47,026 movements in 2019.

<sup>5</sup> CAAVDFT Workshop held 31 Mar 22, minutes are [published here](#).

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	<p>All the LoAs presented are draft. The CAA has been given sight of LoAs with EGNM (ATC) (and EGCN (ATC) not relevant at point of publication), that were signed and will be updated upon approval of the ACP. These LoAs form part of the Sponsors safety case, as there are recommendations by the Sponsor, that pilots utilising the IAPs, contact EGNM or EGCN (depending on the direction of recovery) for ATS.</p> <p>The planned LoAs with Burn and Brighton have not been agreed.</p> <p>The Sponsor has draft LoAs with Garforth (clarification questions<sup>6</sup> dealt with inconsistency in text) and the National Police Air Service (Carr Gate, Wakefield).</p> <p>EGCJ also has an LoA with Leeds East Airport (EGCM) in order to facilitate the shared 'slot system' that will be used to prevent pilots utilising the procedures concurrently into the airfields.</p> <p>The LoA with EGCM, re sharing RNP slot times, will need reviewing, if the IAPs are approved, to ensure clarity in terms of the slot allocation process (22 May22).</p> <p>LoA with Burn Gliding Club not finalised; EGCJ have agreed to a adopt a procedure in the absence of an LoA that will mean that should Burn be launching while an aircraft is making an IFR recovery, the pilot is warned that there is risk of gliders below the cloud, Burn GC will also be informed (see safety Case v5, p36).</p>	
<p><b>2.7</b></p>	<p><b>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 sponsor carried out to resolve any conflicting interests?</b></p> <p>The Sponsor has engaged with local airfields and gliding clubs. There is no LoA with Brighton, however, EGCJ amended the position of a joining point for RWY28 on the procedure in order to avoid Brighton. The Sponsor states that Brighton no longer support the proposal but believe that the risk of impacting on Brighton has now been reduced to a point that 'adequately takes account of activities at Brighton'.</p> <p>The track of the IAP to RWY28 is approx. 1.1NM north of Burn Gliding Club. Aircraft recover to Sherburn today while Burn are launching. If Sherburn based aircraft are flying the procedure in VMC for training purposes, they will always have an instructor, carrying out the duties of a look-out pilot. There is no draft LoA with Burn GC. The CAA asked Burn GC to provide statistical evidence to demonstrate how busy they were in 2019. Total launches for the year - 3425 Busiest day - 43 launches on the 3rd of August 2019. Total days flown – 146. No. of days &gt;75% of busiest day - 35 (based on number of launches).</p>	<p><b>YES</b></p>

<sup>6</sup> Q1 of 2<sup>nd</sup> Set of Clarification Questions.

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	<p>The CAA/DfT Facilitation Team, managed a workshop in order for EGJ, EGCM and local gliding clubs to discuss their concerns around the use of the procedures that have been articulated in the external response letters in order to reduce the flight safety risks that would occur due to a lack of effective communication between the Sponsor and stakeholders.</p> <p>The Sponsor has stated that they will continue to engage with the local gliding clubs to ensure that the system utilised to book and fly the IAPs is managed effectively and maintains flight safety. The Sponsor's determination to mitigate the risk of a MAC with an aircraft on the RWY28 IAP, while Burn is launching, is captured as a condition below.</p>	
2.8	<p><b>Is the evidence that the Airspace Design is compliant with ICAO SARPs, Airspace Design &amp; FUA regulations, and Eurocontrol Guidance satisfactory?</b></p>	YES
	<p>IFP review complete.</p>	
2.9	<p><b>Is the proposed airspace classification stated and justification for that classification acceptable?</b></p>	N/A
2.10	<p><b>Within the constraints of safety and efficiency, does the airspace classification permit access to as many classes of user as practicable?</b></p> <p>Yes (Class G). The ATZ must be managed in accordance with the operator's licence and as such there can be no segregation of aircraft. It will be the sole responsibility of the pilot flying the procedure to ensure they comply with the rules of the air while operating in the ATZ. The Sponsor has also produced a local Pilot Brief that requests participating pilots follow the guidance in order to mitigate the risk of aircraft on the IAP interacting with aircraft utilising the visual circuit within the ATZ.</p>	YES
2.11	<p><b>Is there assurance, as far as practicable, against unauthorised incursions? (This is usually done through the classification and promulgation)</b></p> <p>The procedures are all within Class G airspace so no incursions can be possible.</p> <p>IAP chevrons will be added to the VFR charts to warn other airspace users that there are IAPs into EGJ.</p> <p>(The WP CJE01 (for RWY 28) is located 100ft below the EGCN CTA5 (Class D) This is not relevant at point of publication); there is a draft LoA between EGJ (and EGCN, this is not relevant at point of publication) will endeavour to provide an ATS if they have capacity to do so. It is incumbent on pilots to remain clear of CAS unless they have a clearance to enter. This issue is captured at this juncture as the CAA have not concluded their decision regarding the future of EGCN Airspace. See decision for explanation.</p> <p>The IAF for RWY 10 (ULPUG) is located below EGNM CTA1 (Class D); there is a draft LoA between EGJ and EGNM, whereby EGNM will endeavour to provide an ATS if they have capacity to do so. It is incumbent on pilots to remain clear of CAS unless they have a clearance to enter.</p>	YES

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	<p>All aircraft utilising the IAP will be expected to sqk 5077, which is recognised in the draft LoAs with EGNM and EGCN. The pilot brief highlights the procedures and the risk of infringing CAS around EGCN.</p> <p>The procedures are intended to provide a safer recovery to EGJ in poor weather and therefore it is expected that a FIS will be provided. The risk of incursion is increased if a pilot is not in receipt of a FIS. 23 Sep 22, DSA announced closure. Risk of incursion is removed at this juncture, with regard to EGCN.</p>	
<b>2.12</b>	<p><b>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?</b></p>	<b>N/A</b>
	<p>No controlled airspace.</p>	
<b>2.13</b>	<p><b>Are appropriate arrangements for transiting aircraft in place in accordance with stated commitments?</b></p>	<b>N/A</b>
	<p>No controlled airspace – no transits required.</p>	
<b>2.14</b>	<p><b>Are any airspace user group's requirements not met?</b></p>	<b>NO</b>
	<p>The local gliding community have written to GD SARG to indicate their concerns about this ACP.</p> <p>Other airspace users' requirements were considered during the development of the ACP. The design of the preferred option was influenced by the requirements of other airspace users and local ANSPs.</p> <p>The introduction of these procedures will not alter the way (laterally/vertically) in which aircraft can currently recover to EGJ, they will facilitate the opportunity to recover in weather minima that could currently present an unacceptable risk to the pilot. The Sponsor has endeavoured to develop LoAs with local gliding clubs but has been unable to reach agreements that would be acceptable to both parties. The CAA does not consider that the implementation of the proposed procedures will create an imposition on the concerned stakeholders in terms of their ability to continue to operate as they have been operating prior to implementation. The requirement to maintain the 'see and avoid' principle while operating VFR in class G airspace remains extant. The opportunity to derive an awareness of aircraft utilising the procedures, through broadcasting on the glider frequency and liaison with EGJ, does require participation from stakeholders. The IAPs do not constitute a 'barrier' or 'airspace construct' and the fact that an aircraft may utilise the IAPS to make an approach to EGJ does not alter how other airspace users should operate in class G airspace.</p> <p>The CAA has stipulated conditions (see below) in order to provide clarity for other airspace users with regard to the usage of the IAPs.</p>	
<b>2.15</b>	<p><b>Is any delegation of ATS justified and acceptable? (If yes, refer to Delegated ATS Procedure).</b></p>	<b>N/A</b>
	<p>EGJ provides an AGCS, there is no delegation of ATS. Pilots wishing to fly the procedure, are recommended to seek a FIS from EGCN or EGNM or another suitable radar unit, depending on their direction of arrival.</p>	

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<b>2.16</b>	<p><b>Is the airspace structure 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?</b></p>	<b>YES</b>
	<p>The ACP is limited to the design of the IAPs, with no changes to existing airspace structures or addition of any new volumes of CAS. The IAPs have been designed to take account of in-scope aircraft performance (subject to IFP check).</p>	
<b>2.17</b>	<p><b>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).</b></p>	<b>N/A</b>
	<p>No formal buffers applicable.</p>	
<b>2.18</b>	<p><b>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?</b></p>	<b>NO</b>
	<p>There is no new airspace structure (volumes of CAS) and no ATC procedures. EGCJ will provide a AGCS and retain their ATZ within Class G airspace. ATM procedures have been developed to reduce/eliminate risks associated with more than one aircraft conducting an instrument approach at the same time (ie introduction of slot times), and to mitigate the risk of integration issues with the VFR operation and other IFR traffic. It is accepted that that the AGCS radio station operator (RSO) can make a broadcast in accordance with CAP 413 Supplementary Instruction 2021/01, that states 'no known traffic in the ATZ'.</p> <p>The Sponsor cannot control aircraft in the visual circuit, it will require good airmanship and acceptance from the pilots in the visual circuit, that they should land or vacate the circuit in order to provide the mitigation stated by the Sponsor in their safety case. The pilots will have responsibility for ensuring that they comply with the rules of the air, while utilising the IAPs.</p> <p>The Sponsor has set a lower cloud base limit of 1200ft AGL (based on local met info) above which only VFR recoveries can be made. Should the cloud base drop below 1200ft AGL, EGCJ will close their visual circuit mitigating the risk of an interaction by VFR circuit traffic and IFR IAP traffic.</p> <p>A condition of approval will be that the sponsor recognises and accepts that an ATZ in Class G airspace does not provide any segregation or a known operating environment.</p>	
<b>2.19</b>	<p><b>Is the airspace structure designed to ensure that adequate and appropriate terrain clearance can be readily applied within and adjacent to the proposed airspace?</b></p>	<b>YES</b>
	<p>Awaiting IFP Regulator review.</p>	
<b>2.20</b>	<p><b>If the new structure lies close to another airspace structure or overlaps an associated airspace structure, have appropriate operating arrangements been agreed?</b></p>	<b>YES</b>



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	<p>EGNM and EGCN (Class D), EGCM (ATZ).                  (LoA with EGCN; pilot to endeavour to be in receipt of FIS from EGCN for the procedure to RWY 28 as it passes 100ft below Class D on the downwind leg. This is not relevant at point of publication)                  The LoAs are clear that any ATS provided is subject to unit ATC capacity and that pilots may not receive an ATS; this is no different to today's operation. If either or both EGNM (and EGCN this is not relevant at the point of publication) withdraw or amend the LoAs in the future then the safety arguments will need to be re-addressed – See condition of approval.</p>	
<b>2.21</b>	<p><b>Where terminal and en-route structures adjoin, is the effective integration of departure and arrival routes achieved?</b></p> <p>No connection to en-route structures.</p>	<b>N/A</b>

<b>3.</b>	<b>Supporting Resources and CNS Infrastructure</b>	<b>Status</b>
<b>3.1</b>	<p><b>Is the evidence of supporting CNS infrastructure together with availability and contingency procedures complete and acceptable? The following are to be satisfied:</b></p> <ul style="list-style-type: none"> <li>▪ <b>Communication:</b> 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?</li> </ul> <p>The ACP did not provide an explanation of the future requirements. The EUR Frequency Management manual EUR DOC 011 states: <i>The DOC is that agreed to be the standard for the region (). Values different from those indicated may be used in some cases, as appropriate. Minimum required coverage volumes should be used where frequency congestion exists.</i> Frequency Managers will try to use the standard DOC when possible but there are many aerodromes that have larger DOC's depending on their Airspace requirements. The CAA will accept a longer DOC in this case.                  The pilot brief describes the pilot contacting Sherburn at 25 miles. The Sponsor has confirmed that they will upgrade the airfields radio equipment prior to implementation, it will therefore be a condition of approval.                  British Gliding Association have also agreed that EGCI may use the local glider radio frequency to make "blind calls" to inform local gliders of expected IFR approaches. This frequency is already in use the in the relevant area.</p>	<b>YES</b>

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	<ul style="list-style-type: none"> <li>▪ <b>Navigation:</b> 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? E.g. Nav aids – has coverage assessment been made e.g. a DEMETER report, and if so, is it satisfactory?</li> </ul>	<b>N/A</b>
<p>The equipment required for Navigation is all aircraft and satellite based.</p>		
	<ul style="list-style-type: none"> <li>▪ <b>Surveillance:</b> Radar Provision – have radar diagrams been provided, and do they show that the ATS route / airspace structure can be supported?</li> </ul>	<b>N/A</b>
<p>No radar diagrams provided.                  The Safety Case does recommend that pilots seek an ATS from EGNM or EGNC depending on the direction of arrival. The opportunity to request and receive an ATS from (either) EGNM (or EGNC this is not relevant at the point of decision) will not change as result of implementation of these procedures, as the LoAs make it clear that any provision of an ATS is subject to ATC capacity. The CAA does not require surveillance coverage diagrams as the provision of service is not changing.                  5077 is allocated as the conspicuity sqk.</p>		
3.2	<p><b>Where appropriate, are there any indications of the resources to be applied, or a commitment to provide them, in line with current forecast traffic growths acceptable?</b></p>	<b>YES</b>
<p>EGCJ are willing to make blind calls on the local glider frequency to warn of expected IFR approaches. BGA have agreed to this use of the frequency. EGCJ have drafted LoAs with the relevant local units. While not all have signed, EGCJ have indicated that they intend to operate as if the LoAs had been signed, including coordinating with those specific units which will be particularly affected by individual aircraft on a flight-by-flight basis. Current and forecast traffic movements are well within EGCJ's potential capacity without further resources. Conditions of approval will stipulate the requirement to meet key commitments, such as training and DOC, prior to implementation.</p>		
<b>4.</b>	<b>Maps/Charts/Diagrams</b>	<b>Status</b>
4.1	<p><b>Is a diagram of the proposed airspace included in the proposal, clearly showing the dimensions and WGS84 co-ordinates?                  (We would expect sponsors to include clear maps and diagrams of the proposed airspace structure(s) – they do not have to accord with AC&amp;D aeronautical cartographical standards (see CAP725), rather they should be clear and unambiguous and reflect precisely the narrative descriptions of the proposals. AC&amp;D work would relate to regulatory consultation charts only).</b></p>	<b>YES</b>
<p>Indicative diagrams are supplied in the main airspace change package with detailed ones (including precise coordinates) in the IFP Design submission.</p>		

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4.2	<b>Do the charts clearly indicate the proposed airspace change?</b>	<b>YES</b>
Indicative maps show geographical context, IFP submission shows detailed procedures.		
4.3	<b>Has the Change Sponsor identified AIP pages affected by the Change Proposal and provided a draft amendment?</b>	<b>YES</b>
Coding tables and IFP diagrams have been provided.		
4.4	<b>Has the Change Sponsor completed the WGS84 spreadsheet and submitted it to the CAA for approval?</b>	<b>YES</b>
Yes.		
<b>5.</b>	<b>Operational Impact</b>	<b>Status</b>
5.1	<p><b>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?</b>  <b>Consideration should be given to:</b>  <b>a) Impact on IFR GAT, on OAT or on VFR general aviation traffic flow in or through the area.</b></p>	<b>YES</b>
<p>The proposal has evolved to take account of local traffic in Class G airspace, including local gliding sites, and the Sponsor has developed draft LoAs with as many relevant stakeholders as possible. The proposed IAPs will be flown in Class G airspace in simulated IFR for training purposes or under IFR if the weather minima requires it. There should be no impact on other IFR GAT, OAT or VFR GA, as it is the responsibility<sup>7</sup> of all pilots to comply with the rules of the air<sup>8</sup> and ensure collision avoidance while operating in Class G airspace. The proposed RNP IAPs will afford suitably equipped aircraft the opportunity to attempt to recover to EGJ in IMC (this currently should not be done, without consideration of the potential for the increased risks of recovering in IMC). Aircraft operators (AOs) may also choose to fly the procedure in VMC and the IAPs can only be utilised if a slot is booked (PPR).</p>		

<sup>7</sup> See [Section 2 of the ANO 2016](#)

<sup>8</sup> [SERA](#) as referenced in CAP393

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Once implemented, pilots of suitably equipped aircraft can attempt a recovery at EGJ in IMC by flying a systemised RNP procedure and therefore there will be the potential for a change in aircraft behaviours (currently certain operators would not attempt a recovery in IMC). However, this cannot be considered as altering where aircraft currently fly or as having an impact on traffic flow through the area due to the classification of the airspace and the flight rules that should be followed by pilots of all aircraft, while flying in the area. Aircraft currently fly similar profiles to the proposed procedures today and there is no new volume of CAS or associated restrictions to transiting aircraft, which could alter aircraft behaviours.

The impact, in terms of increasing arrivals, is expected to be low when considering the forecasted low usage of 726 approaches (2023/24), which suggests an average of 2.0 utilisations a day. The slot system, which is shared with EGCM, allows for a maximum of 8-11 in any single day (depending on the time of year) and growth is already taking place without the benefit of IAPs.

**b) Impact on VFR Routes.**

N/A

There are no defined VFR routes. The airspace in the area is considered to be an area of intense aerial activity (AIAA) and is marked as such on the charts. This is an awareness label for the area based on the possibility of it being utilised by many different airspace users, including the military. The IAPs do not constitute a 'barrier' or 'airspace construct' and the fact that an aircraft may utilise the IAPs to make an approach to EGJ does not alter how other airspace users should operate in class G airspace. Class G airspace is for all and pilots must apply sound airmanship in order to mitigate the risk of a MAC in uncontrolled airspace.

**c) Consequential effects on procedures and capacity, ie on SIDS, STARS, holds. Details of existing or planned routes and holds.**

N/A

No impacts on SIDS/STARS/Holds for existing commercial airports, due to the LoAs with EGNM and EGCM stipulating any provision of an ATS being constrained by capacity.

The Sponsor is not requesting a hold as part of the proposal and has presented explanations as to why a hold is not required in the IAP design.

**d) Impact on Airfields and other specific activities within or adjacent to the proposed airspace.**

YES

The Sponsor has conducted effective engagement with local minor airfields and gliding sites in order to consider their requirements within the proposal and to develop suitable LoAs.

These IAPs do not alter the classification of airspace. They are RNP IAPs that commence at a point in space and should end with the participating aircraft flying along the procedure and landing safely at EGJ. The routes of the IAPs will have no impact on specific activities or adjacent airfields, as they do not alter the Class G airspace.

There is an LoA in place to share the utilisation of the IAPs (the slot allocations) with EGCM as this airfield also has proposed IAPs (awaiting regulatory approval.) This LoA will ensure that pilots cannot fly into both airfields concurrently. The LoA will have to ensure the same rules re flying in the ATZ, out of hours ops and any rules relating to the use of the visual circuit.

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	<p>Should the proposed IAPs for EGCM be approved, the introduction of IAPs to both airfields will facilitate the recovery of suitably equipped aircraft in weather minima that would currently preclude a recovery without increased risk to safety. Both airfields sit within Class G airspace and currently pilots recover safely through extant application of the rules of the air.</p> <p>The local procedures that will have to be followed in order to utilise the IAPs will provide improved awareness to stakeholders (other airspace users) if they choose to derive the available information, such as notification of the booked slots, make best endeavours to receive a FIS<sup>9</sup> and through liaison with the AGCS/O at EGJ, for example. Aircraft operating from adjacent airfields also have to comply with the applicable rules of the air. The CAA accepts that there is potential for aircraft to routinely fly the proposed IAPs, however, given the extant classification of the airspace, the placement of the IAPs and the potential shared utilisation of the IAPs with EGCM, they should not have an adverse impact on adjacent airfields.</p>	
	<p><b>e) Any flight planning restrictions and/ or route requirements.</b></p>	<b>NO</b>
	<p>There are no flight planning restrictions and/or route requirements as a result of the proposed IAPs.</p>	
<b>5.2</b>	<p><b>Does the Change Sponsor Consultation letter reflect the likely operational impact of the change?</b></p>	<b>N/A</b>
	<p>The CAA agreed (in 2016), that provided the Sponsor met certain conditions<sup>10</sup> then a formal consultation would not be required. Although not required to undertake a formal consultation, the sponsor did engage directly with key stakeholders who could potentially be impacted by the proposal. This targeted engagement was conducted by email, teleconference and via meetings held both online and in person with aviation users including gliding clubs, airports, aerodromes and local NPAS and Air Ambulance operators as well as the Sherburn Aerodrome Community Liaison Group, which consists of nominated representatives from local County, District and Parish Councils. Stakeholder engagement commenced in 2016 and a presentation was provided to the Liaison Group in 2017. Engagement with airspace users has been ongoing since 2016. Engagement evidence has been submitted in support of this submission and reviewed. The sponsor engaged with local airspace stakeholders from 25 August 2021 to 16 September 2021 appraising them of revisions made to the proposals. When the sponsor updated their submission in November 2021 the proposal had not materially changed and so no further targeted engagement activity by the sponsor was necessary.</p> <p>The sponsor conducted extensive engagement with stakeholders to attempt to develop LoAs to mitigate any significant operational impacts. Draft LoAs have been agreed and signed with: Leeds Bradford Airport, Doncaster Sheffield Airport (prior to closure) and National Police Air Service (NPAS) Carr Gate, Wakefield. With the planned IAPs at Leeds East Airport (LEA) overlapping those at Sherburn, significant engagement to resolve co-ordination issues resulted in a draft LoA (not signed) to avoid concurrent use of the IAPs when operational both at LEA and Sherburn. A co-ordination LoA has been agreed (not signed) with Garforth Landing Site. In June 2020, Brighton Aerodrome stated they could not agree an LoA as not all of their requests</p>	

<sup>9</sup> LoAs have drafted with EGCM and EGNM that will allow participating pilots to request a FIS, subject to ATC capacity.

<sup>10</sup> See meeting minutes Apr 21 which listed the previously agreed conditions.

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had been met. Neither was agreement reached with Burn Gliding Club.

Feedback received influenced changes made to the layout of the procedures. For example, the original northern initial approach fix was removed, and a new initial fix created following stakeholder concerns regarding lateral and vertical proximity of the proposed IAP to Brighton Aerodrome and their circuit. Concerns raised by Doncaster Sheffield Airport regarding the proximity of the southern joining procedure to RWY 28 and the northwest area of the airport's CTA led to a redesign of the southern join and provision of guidance in the pilot briefing for the IAP.

Some stakeholders thought that the existence of the IAPs would lead to an increased volume of traffic. The sponsor's response was that this was not the intention, the procedure would only be used in poor weather and when there is no visual flying in the aerodrome traffic pattern. Utilisation figures are addressed at 5.1 above.

Some stakeholders have contacted the CAA directly stating that a formal consultation should have been conducted for this airspace change proposal. The CAA has determined that the conditions specified following the Framework Briefing held in 2016 have been met by the sponsor and that the Sponsor has consulted with targeted stakeholders, accordingly there is no requirement for the sponsor to conduct a formal consultation.

In March 2022, the CAA's Facilitation Team convened a workshop for stakeholders from Leeds East Airport, the British Gliding Authority, and other gliding clubs/organisations to discuss the proposal with the sponsor.

This workshop resulted in dialogue between the sponsor and local gliding club representatives. The key action was an agreement to continue working together to try and develop and agree LoAs, including areas discussed and agreed at the meeting and a determination to continue to engage on the perceived issues.

6.	<b>Economic Impact</b>	<b>Status</b>
6.1	<p><b>Is a provisional economic impact assessment to all categories of operations and users likely to be affected by the change included and acceptable? (This may include any forecast capacity gains and the cost of any resultant additional track mileage).</b></p> <p>The Sponsor is not required to produce an economic assessment under CAP725 (para-A.9) if it is not practicable to do so. This ACP is not intended to create any economic impacts. The procedures are wholly within Class G airspace and therefore cannot create any economic disbenefit, it would not be proportionate to consider economic impacts to other airspace users, as the economic baseline for use of Class G airspace is unquantifiable.</p>	N/A

<b>7.</b>	<b>Recommendations / Conditions / PIR Data Requirements</b>
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7.1	<p><b>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.</b></p>	<b>YES</b>
<p><b><i>GUIDANCE NOTE:</i></b> Recommendations are something that the change sponsor <b><i>should try</i></b> 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.</p> <p>1) The Sponsor must ensure they continue liaise with the local airfields and gliding clubs in order to ensure that the system utilised to book and fly the IAPs is managed effectively and maintains flight safety.</p>		
7.2	<p><b>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.</b></p>	<b>YES</b>
<p><b><i>GUIDANCE NOTE:</i></b> Conditions are something that the change sponsor <b><i>must fulfil</i></b> either before or after implementation, if indeed the airspace change proposal is approved. If their proposal is approved, change sponsors <b><i>must</i></b> observe any condition(s) contained within the regulatory decision; failure to do so <b><i>will usually</i></b> 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.</p> <ol style="list-style-type: none"> <li>1) Prior to implementation all the draft LoAs must be reviewed and accepted by the CAA.</li> <li>2) Prior to implementation the Sponsor must ensure that the documentation which refers to agreed procedures for AGCS/Os and pilots flying the procedures, is aligned with the AGCS phraseology in Chapter 4 of <a href="#">CAP413</a>.</li> <li>3) The slot allocation system (as described in the EGJ/EGCM LoA) must ensure that there is no possibility of aircraft being booked into EGCM and EGJ concurrently and be aligned in terms local procedures with EGCM concerning visual circuit occupancy (Amend the LoA, see condition 1).</li> <li>4) Prior to implementation all mitigations to the hazards, in the safety case, are to be accepted by the operating authority and all outstanding controls/mitigations are to be in place.</li> <li>5) Prior to implementation (at least 28 days) evidence of the completion of outstanding controls and mitigations to be supplied to the CAA for review.</li> <li>6) On completion of actions required for controls or mitigations, safety hazards are reviewed in accordance with the units SMS (CAP760/795) to confirm post mitigation risk (prior to implementation).</li> <li>7) Prior to implementation the DOC for the Sherburn Radio frequency must adequately cover the geographical span of the procedures and align with the Pilot Brief (suitable communication infrastructure to be installed and tested.)</li> <li>8) Prior to implementation the Frequency for EGNM is to be corrected (to 134.580) in the pilot brief (v1.53, published May 22).</li> <li>9) Prior to implementation the PAPIs are to be set in accordance with the GP of the approved procedures.</li> </ol>		

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	<p>10) Following implementation, if the LoA with EGNM is withdrawn or amended, the impacts on the safety case are to be reviewed. The IAPs are to be suspended pending this review (NOTAM). If the EGCN airspace, as currently published, is re-notified the procedures are also to be suspended (NOTAM), pending a CAA review.</p> <p>11) Following implementation, the Sponsor must ensure that they inform all pilots utilising the IAP to RWY 28 at EGJ when they are aware of gliders operating from Burn GC (amend Safety Case P36, control measure 8). Should the sponsor determine that the risk of a MAC while flying either procedure is heightened due to increased glider activity, then the procedure(s) are to be suspended until such time as the activity is considered not to present a heightened risk.</p> <p>12) A pilot may not make an initial airborne request for a procedure slot, unless in an emergency (update pilot brief accordingly).</p> <p>13) Prior to implementation, evidence of the publication of updated procedures and the completion of training for AGCS/Os, must be provided to the CAA ATS Inspector.</p> <p>14) Prior to implementation, procedures for EGJ should ensure that, in the event of a missed approach, EGCM is advised by telephone to assist in the management of potential conflicts.</p> <p>15) All periodic post monitoring reports, including performance against SPIs are submitted to the CAA for review.</p>	
<b>7.3</b>	<p><b>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.</b></p>	<b>YES</b>
	<p>The Sponsor will be sent a separate PIR Letter detailing the requirements of this part of the process, which will be published on the CAA Webpage for this ACP.</p>	

<b>Case Study Conclusions – To be completed by SARG Project Leader</b>	<b>Yes/No</b>
<p><b>Has the Change Sponsor met the SARG Airspace Change Proposal requirements and Airspace Regulatory requirements above?</b></p>	<b>YES</b>
<p>When considering the operational aspects of this proposal, the Sponsor has met the requirements of CAP725, endeavoured to meet updated requirements under CAP1616, and other relevant regulatory requirements. On balance, the proposal has been developed through an appropriate and proportionate approach given the low impact of the proposed IAPs when compared to larger airfields. There is not a business need for the introduction of IAPs and the impact on EGJ's own traffic (increase in resilience) and that of other local airfields has been considered, with feedback taken into account when refining the procedures.</p> <p>Discussions have been held with the Sponsor regarding the inconsistencies and lack of clarity in some key areas of the submission. As result of this, the CAA has stipulated conditions that must be met prior to implementation and a recommendation that should be followed post implementation. Should the conditions not be met, within 12 months of the approval, the CAA will suspend the approval pending a review.</p>	



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Given the acknowledgement from the Sponsor, that they will meet the conditions stipulated above the CAA is satisfied that the Sponsor has met the SARG Airspace Change Proposal requirements.

Third Party Approval	Yes/No
Is the approval of the SoS for Transport required in respect of the Environmental Impact of the airspace change?	NO
Is the approval of the MoD required in respect of National Security issues surrounding the airspace change?	NO

### General Summary

The Sponsor has applied CAP1122 and CAP 760 methodologies and produced a safety case, that results in actions which require completing prior to implementation, these form part of the conditions of approval in order to mitigate risk.

The introduction of the proposed IAPs will mean that pilots who would not currently elect to recover to EGJ in IMC, will be able to do so by following an approved, terrain safe procedure. This will change aircraft behaviours, however, the forecast maximum usage due to the agreed slot system is low when compared to the overall arrival forecasts presented in the ACP. The IAPs are not an airspace structure and therefore cannot create an imposition on other airspace users or impacts in class G airspace as they do not hold any status that requires other airspace users to alter how they operate today.

The purpose of the IAPs is to provide a safer way of recovering in poor weather. The IAPs will be highlighted by feathers on VFR charts, however, these are intended to increase awareness and not be viewed as a barrier prevent flight or alter flights through class G airspace. Transiting pilots will be afforded the opportunity to contact the airfield and as a result of the slot booking system, they will have the opportunity to become aware of aircraft attempting the procedures.

The system stated by the Sponsor, if utilised accordingly, should reduce the risk of a MAC; however, any pilot who chooses to fly the IAPs will have to accept that there are intrinsic risks associated with flying in Class G airspace. Nor the CAA or the Sponsor can force a pilot to brief/plan; however, it is expected that good

airmanship will be applied. The CAA does not expect pilots to fly the IAPs without permission from EGJ, which will mean the proposed mitigations, within the system, are applied.

Aircraft currently recover to EGJ without the benefit of a notified IAP, along similar routes to the proposed IAPs. Pilots operate today applying the rules of the air and there is an opportunity to request an ATS from EGNM and EGCN (not at the point of publishing this document). The implementation of the IAPs is intended to enhance the safety of recoveries that already take place and any changes to flight behaviours are unlikely to be noticeable by other airspace users or parties on the ground. Awareness of aircraft utilizing the IAPs will be available from the AGCS/O at EGJ, due to the slot booking system and the broadcasting on the common glider frequency<sup>11</sup>.

The Rules of the Air Regulations 2015, Rule 11, sub paras (5),(6) and planning (understanding the Pilot Brief and use of the slot booking procedure) apply as the key mitigations to a MAC for an aircraft utilizing the IAP vs transiting GA and aircraft within the ATZ. The Sponsor has produced a safety case that demonstrates that the introduction of the IAPs would maintain a high standard of safety, when compared to the current operation. The CAA considers the threshold of maintaining a high standard, should be measured against the current situation, ie how aircraft are safely operated into EGJ today during poor visibility. The CAA's key duty, under S.70 of the Transport Act 2000, is to only approve an ACP if it maintains a high standard of safety.

The CAA has noted some inconsistencies within the documentation that have been discussed with the Sponsor and rectification of these points is a condition of approval. The proposed introduction of GNSS RNP IAPs at EGCM, which is 3NM from EGJ, does mean that an LoA has been developed between both Sponsors and as such they will share slots for arrivals wishing to utilise the procedures. Both airfields have forecast growth in their proposals, but not more than 10% of 2021 levels or as a result of the introduction of the procedures. Growth in traffic would take place without the approval of the procedures and pilots could choose to fly a similar track to the procedures today with increased risk in poor visibility.

The procedures have been designed to be safe in terms of terrain clearance and flyability. The CAA continues to ensure pilot standards through extant regulatory oversight and approval of this proposal does not introduce any new requirements.

The use of GNSS equipment on board an aircraft when coupled with approved IAPs constitutes an 'aid to let down', under Art 183 of the UK ANO 2016 and should warrant an Approach Control Service (ACS). However, following consideration of the safety arguments presented by the Sponsor and consideration of the current responsibilities imposed upon a pilot operating in Class G airspace, the CAA accepts that the system (AGCS information, IAP slot booking, briefing, LoAs, broadcasts, chart feathers) being employed by EGJ, to maintain a high standard of safety when utilizing the RNP IAPs, is satisfactory.

EGCN (DSA) withdrew the provision of an ATS early Dec 22. As a result of this the CAA is sponsoring an ACP (2022-082) to consider the withdrawal of EGCN from the UK AIP. This ACP has been impacted by the closure of EGCN and as a result the sponsor was asked to consider the impacts accordingly. This has resulted in

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<sup>11</sup> ACP Para 7.5.

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modifications to the IAPs, such that they do not require design dispensations, should the EGCN airspace remain permanently de-notified. If the EGCN airspace (as currently published) is re-notified, then the sponsor, subject to CAA approval (a safety review), can revert to the IAPs that take account of the EGCN airspace.

**Comments & Observations**

This ACP began under a process which has now been withdrawn, however, the CAA has endeavoured to apply current processes, policies and standards where it is relevant and proportionate to do so, in order to provide transparency and better understanding to relevant stakeholders. The change sponsor has provided 4 versions of the ACP and updates to associated documents that have provided clarity with regard to procedures that will be employed to maintain a high standard of safety.

Operational Assessment Sign-off/ Approvals	Name	Signature	Date
Operational Assessment completed by:	<div style="background-color: black; width: 100px; height: 15px; margin-bottom: 5px;"></div> AR Case Officer	<div style="background-color: black; width: 60px; height: 40px;"></div>	28 Feb 23
Operational Assessment approved:	<div style="background-color: black; width: 60px; height: 15px; margin-bottom: 5px;"></div> Mgr AR	<div style="background-color: black; width: 130px; height: 70px;"></div>	28 Feb 23

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**Mgr AR Comments:**

Case Officers comments are noted and my overall recommendation is set out in the Decision Log.