

# CAA Operational Assessment

Title of airspace change proposal	Manchester Low Level Route
Change sponsor	UK Civil Aviation Authority
Project reference	RCL-2024-001
Account Manager	[REDACTED]
Case study commencement date	12 September 2024
Case study report as at	5 November 2024

### Instructions

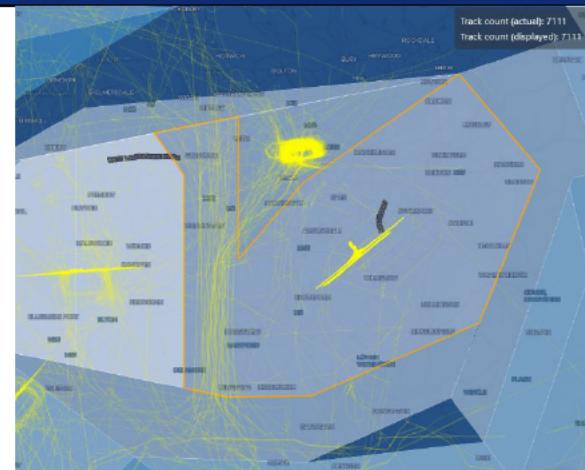
In providing a response for each question, please ensure that the ‘status’ column is completed using the following options:

- 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 is an Airspace Change Proposal conducted under CAP1991 (Procedure for the CAA to review the classification of airspace). It acknowledges that the extant Manchester Low Level Route (MLLR) exists and is regularly utilised by GA traffic (only by exception to the rules of Class D airspace). The trajectories shown on the left are 1 week of traffic using the MLLR in July 2024.

The rules associated with the classification (class D) of the airspace in which it is defined are not adhered to, in that under ORS4 No.1596 aircraft meeting the required criteria, do not need to be under an air traffic control (ATC) service in order to transit class D airspace. The proposal aims to remove the requirement for the current exemption under the ORS4 No.1596 (due to expire in May 2025) by implementing conditions which will be defined by a special use airspace (SUA) restricted area (RA), re-classifying and slightly amending the shape and size of the extant MLLR. As a consequence of the proposed amendments to the classification and volume of the new RA structure, a high standard of safety will be maintained and efficiency of the adjacent controlled airspace (CAS),

as currently used, should not be impacted. The RA will be designated EGR323 North West Transit Corridor, if approved, in order to disassociate it from EGGP and EGCC and to make it clear as to what its purpose is.

1.	Justification for change and options analysis (operational/technical)	Status
1.1	Is the explanation of the proposed change clear and understood?	YES
	<p>The proposed change will see an amendment, if approved, to the size and shape of the extant MLLR, while re-classifying it as Class G airspace. In order to maintain a high standard of safety and reduce the potential consequential impacts, the proposed North West Transit Corridor will have set criteria enacted under the ANO that can be enforced through a RA structure as defined in <a href="#">UK Regulation (EU) No 923/2012</a> - Article 2, No.111 Definitions. An airspace structure, that is designated an RA, is considered to be SUA under the SARG Policy 133: <a href="#">Policy for the Establishment and Operation of Special Use Airspace</a> and as such requires approval from the SoS for the DfT under <a href="#">Article 239(1) of the Air Navigation Order (ANO)</a>, as it creates a legally binding conditions, which must be adhered to, in order to fly within it. If approved, the RA will be Non-AMC Managed (NAM) under CAP740, and should require SUA Authority oversight. However, as the planned RA will be permanently in place if approved, it is being proposed to be exempt from the <a href="#">CAP740</a> requirements(submission doc para 7.11).</p>	
1.2	Are the reasons for the change stated and acceptable?	YES
	<p>The current MLLR airspace is an anomaly to Class D airspace, as its operation does not adhere to the conditions associated with flight in Class D without an exemption. The exemption is due to expire in May 2025 and as such there is requirement for the CAA to ensure that current airspace defined as the MLLR meets ICAO SARPS and UK Policy regarding airspace usage.</p>	
1.3	Have all appropriate alternative options been considered, including the 'do nothing' option?	YES
	<p>The CAA team that has proposed the option above also considered:</p> <ul style="list-style-type: none"> <li>• an 'air-to-air frequency',</li> <li>• 'further widening of the airspace in the southeast corner',</li> <li>• 'widening the airspace to the west and southwest',</li> <li>• 'a "split" airspace solution' and</li> <li>• 'mandating a frequency (air to ground) or squawk for users'.</li> </ul> <p>The details of these options can be found in the submission and the reasons for not taking them forward. The CAA was not able to 'do-nothing' as the OSR4 is due to expire and any extension would only be considered under exceptional circumstances.</p>	

1.4	Is the justification for the selection of the proposed option sound and acceptable?	YES
	<p>The justification for the selected option has been derived through engagement with relevant stakeholders in order to develop a safe and efficient proposal in order to minimise any consequential impacts. The CAA published <a href="#">CAP2564</a> Airspace Classification Review: Manchester Low-Level Route 2023, in Jul 2023 in order to explain the history and rationale for carrying out an airspace change proposal under CAP1991. This review articulated the requirement to remove the ORS4 exemption and why the preferred option should result in the minimum impact to all stakeholders. Furthermore, as EGCC ATC have not been managing the MLLR structure in accordance with Class D rules, it should be re-classified to reflect that there is no requirement for the provision of an ATC service to mitigate risk to adjacent operations. The justification is therefore accepted as meets UK Policy and Legislative requirements (ANO and AMS).</p>	

2.	Airspace description and operational arrangements	Status
2.1	Is the type of proposed airspace design clearly stated and understood?	YES
	<div style="display: flex; align-items: flex-start;">  <div style="margin-left: 20px;"> <p>The proposed structure EGR323 North West Transit Corridor will be classified as class G airspace and will, if approved, be a RA structure with the following criteria being mandatory for permission to fly within it: a maximum indicated airspeed (IAS) of 140kts, minimum in flight visibility of 5km or greater, A maximum Certified Take Off Mass (MCTOM) of 40,000kg (equivalent to “small” wake turbulence category), operating upon either the Manchester or Liverpool QNH. The two green circles show where the structure will be widened when compared to the extant MLLR and raised from 1300ft to 1500ft AMSL. The consequential formation of EGCC CTA6, which will sit above the RA structure (1500ft to 3500ft AMSL) will replicate the full former CTR boundary.</p> </div> </div>	



2.2	Are the hours of operation of the airspace and any seasonal variations stated and acceptable?	YES
	The EGR323 North West Transit Corridor will not open or close. Given its proposed status, it will be notified as available H24.	
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
	There are no impacts on High Seas airspace. The MLLR is currently within the EGCC CTR by the virtue of it being Class D. If approved the re-classification to Class G will mean that the RA structure is no longer included as part of the EGCC CTR, it will be a separate structure. The shape of the structure should have no significant impacts to the EGCC or EGGP operations and published procedures. The raising of the ceiling of the MLLR to 1500ft AMSL, if approved, will limit the descent altitude to 2000ft, by EGGP controllers, of any traffic under their control. Both EGCC and EGGP will ensure that their emergency procedures and documentation are updated as part of their SMS, which will be reviewed under ongoing ATM regulatory oversight.	
2.4	Is the supporting statistical evidence relevant and acceptable?	YES
	The CAA Airspace Analyser Tool (AAT) was used to give an acceptable indication of the number of aircraft that used the extant MLLR over the last 3 years. (On average, circa 100 flights per week use the MLLR.)	
2.5	Is the analysis of the impact of the traffic mix on complexity and workload of operations complete and satisfactory?	YES
	The CAA has engaged with adjacent ANSPs and carried out a consultation, which included other airspace users. This has highlighted that there is an expectation, given that the ORS4 has had to be utilised to facilitate the access to the airspace, because of the lack of controlling capacity, the reclassification of the MLLR to Class G will simplify the traffic mix by segregating the majority of transiting GA traffic (which is not receiving ATC service) within the MLLR. This should reduce controller workload in the EGCC CTR.	
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?	YES
	Para 13.2 of the Amended Submission indicates that there is an inter-unit agreement between EGGP and EGCC. This will require amendment to reflect the new lower limit of CAS in the areas of 1500ft AMSL. <b>Condition – Prior to implementation, the CAA will need to review the inter-unit agreement.</b>	

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
	N/A. The point of the proposal is to resolve the issue of airspace access.	
2.8	Is the evidence that the airspace design is compliant with ICAO SARPs, airspace design & FUA regulations, and Eurocontrol guidance satisfactory?	YES
	<p>If EGCC does not require the proposed area to be classified as controlled airspace to mitigate risks to their operation, then it should be classified as G. It has been accepted, following engagement and analysis, that the standard conditions associated with flying VFR in Class G below 3000ft MSL would not provide the mitigations required to satisfy the safety arguments, given the shape and size of the proposed structure and the nature of the aircraft that may utilise it. As a result of this, the proposal includes the request for a RA. This is a special use airspace structure as defined in <a href="#">SARG Policy 133: Policy for the Establishment and Operation of Special Use Airspace</a>.</p> <p>ICAO Annex 11 – para 2.33.5 Recommendation - When a prohibited, restricted or danger area is established, the area should be as small as practicable and be contained within simple geometrical limits, so as to permit ease of reference by all concern.</p> <p>ICAO Annex 11, Chapter 2, paragraph 2.5, - once it has been determined that air traffic services are to be provided in a particular portion of airspace or in airspace associated with particular aerodromes; those portions of the airspace shall be designated in relation to the air traffic services that are to be provided.</p> <p>As the safety assessments demonstrate that the standard rules applied to class G airspace will not provide suitable mitigations, the RA structure will ensure adherence to specific criteria, that if not met can result in a pilot committing an offence under the ANO, which would require a proportionate response from the SUA Authority and the CAA as required. The proposed size and shape of the RA is based on the safety assessments and intended to reduce risk while ensuring adjacent operations are not impacted.</p>	
2.9	Is the proposed airspace classification stated and justification for that classification acceptable?	YES
	Yes, however, the need for a RA is based on the fact that the Class D airspace has historically not been managed in accordance with its conditions. Arguably this is because there is not enough ATC capacity to facilitate crossing clearances of the class D given the number of aircraft that utilise the extant MLLR. However, this proposal demonstrates that EGCC and EGGP do not require the extant MLLR structure to be classified as D in order to mitigate risks to their operations. Without the requirement and the provision of an ATS, the airspace must be classified as G. However, the process followed by the CAA has shown that class G airspace does not offer the required mitigations to the risks identified in the HAZID workshops carried out. The conditions imposed by a RA are not intended to protect a surface installation or activity, like most RAs. It has 2 purposes;	

	<p>1. to be clear on the aircraft types that can enter the proposed MLLR and</p> <p>2. to impose a significant consequence on any pilot not adhering to the conditions.</p> <p>The fact that an RA can only be implemented by an SI under Art 239 of the Air Navigation Order, demonstrates the importance placed on adherence to the conditions in order to mitigate the described risks. However, the intent will not manifest if there is no ability to ensure compliance with the criteria. The use of the Alleged Breach of Air Navigation Legislation (ABANL) form will enable the CAA to take action on any pilots that do not comply.</p> <p>The formation of EGCC CTA6 aligns with the remaining CTR and abuts EGCC CTAs 4 and 5.</p> <p><b>Condition – Post implementation, the SUA Authority (EGCC ATC) will be subject to oversight in accordance with para E5.2 of SARG Policy 133 to ensure that the proposed procedures are ensuring the safe and efficient management and operation of the RA.</b></p>	
2.10	<p>Within the constraints of safety and efficiency, does the airspace classification permit access to as many classes of user as practicable?</p>	YES
	<p>There is a deliberate set of restrictions that would be imposed by the RA (a maximum indicated airspeed (IAS) of 140kts, minimum in flight visibility of 5km or greater, A maximum Certified Take Off Mass (MCTOM) of 40,000kg (equivalent to “small” wake turbulence category) and operating upon either the Manchester or Liverpool QNH) in order to only allow aircraft deemed not to pose a risk to the operations of other airspace users, EGCC and EGGP. However, the process for allowing non-standard flights will not be permitted without following the NATS non-standard flight (NSF) application procedure, which will be managed by EGCC ATC, as the SU Authority. In order for this to have effect it will be included in the SI and overseen as part of the SUA oversight activity (SARG Policy 133 para 8.14)</p> <p><b>Condition – Prior to implementation, the SI will stipulate that a non-standard flight can use the RA in accordance with permission granted by EGCC ATC, following acceptance under the NATS NSF application procedure.</b></p>	
2.11	<p>Is there assurance, as far as practicable, against unauthorised incursions? (This is usually done through the classification and promulgation.)</p>	YES
	<p>One of the key objectives of this proposal is to reduce unauthorised incursions into the RA. By making the structure an RA, the consequence of entering it without meeting the conditions could be serious in terms of the law. In order to mitigate the risks associated with infringing the adjacent CAS managed by EGCC and EGGP, a minimum inflight visibility of 5km is proposed, the use of a frequency monitoring code will be encouraged, an extra 200ft in vertical airspace is proposed, a max IAS of 140kts will be imposed, the utilisation of a QNH, basing the structure boundary on ground features and a dedicated communications campaign to ensure all stakeholders understand the proposed changes. Given that the rules are not broadening the scope of aircraft types which could utilise the proposed structure, then failure to be aware of the change should not result in pilot error if the pilot is a regular user. The VFR chart (1:500,000) will be updated 17 Apr 2025.</p>	
2.12	<p>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?</p>	YES



	This will be an RA and if approved, only aircraft that meet the criteria will be permitted to transit. The conditions are designed to mitigate risk and to take account of the requirements of the majority of intended users, it is therefore acceptable. Transit through the adjacent airspace will be in accordance with the rules of the air for the classification of the airspace.	
2.13	Are appropriate arrangements for transiting aircraft in place in accordance with stated commitments?	N/A
	See above.	
2.14	Are any airspace user group's requirements not met?	N/A
	The RA imposes a strict set of conditions aimed at allowing a traffic mix, broadly in line with that currently using the MLLR to utilise the proposed structure. The amendment aims to recreate the access levels available to GA traffic in today's operation and therefore it is expected that today's traffic levels will remain.	
2.15	Is any delegation of ATS justified and acceptable? (If yes, refer to Delegated ATS Procedure).	N/A
	There is no delegation of ATS.	
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?	YES
	The proposal considered the parameters associated with the current main user group. The increased volume and other restrictions to be imposed should allow safe transits as required. The widening to the east with clear reference points should aid pilots situational awareness.	
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
	There is no requirement for a safety buffer as the SI will impose speed and visibility restrictions that are intended to prevent incursions into the adjacent CAS.	
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?	YES

	<p>There are no ATC procedures associated with the proposed RA. However, there will need to be changes to the required documentation at EGGP and EGCC. Both airports provided impact assessments to the CAA and the CAA produced a safety case. EGGP raised a concern relating to engine out procedures for aircraft departing on RWY09 and a reduction on vertical separation against inbound traffic to RWY27. Both concerns have been mitigated to the level of 'review'. EGCC raised a concern about widening a portion of the extant MLLR by 0.65nm as it would reduce time for an ATCO to react to an airspace infringement. The CAA is satisfied that the risks highlighted by both units can be satisfactorily mitigated.</p> <p><b>Condition - Prior to implementation, all the mitigations to the hazards, in the safety case, are to be accepted by the SUA Authority and all outstanding controls/mitigations are to be in place (details to be provided by the ATS Inspector for EGGP and EGCC).</b></p> <p><b>Condition - Prior to implementation (at least 28 days) evidence of the completion of outstanding controls and mitigations to be supplied to the CAA.</b></p> <p><b>Condition – The CAA ATS Inspectors must be satisfied, following a review, that the units impacted by the proposed changes amend any impacted procedures, complete any required conversion training, and update associated documents in order to meet the mitigations stated in the safety case.</b></p> <p><b>Condition - On completion of actions required for controls or mitigations, safety hazards are to be reviewed in accordance with the units SMS (CAP760/795) to confirm post mitigation risk.</b></p>	
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
	Yes, by raising the altitude of the proposed RA any transiting aircraft will have more terrain clearance than is currently permitted.	
2.20	If the new structure lies close to another airspace structure or overlaps an associated airspace structure, have appropriate operating arrangements been agreed?	YES
	<p>There are number of LoAs that will need withdrawing and the inter-unit agreement between EGCC and EGGP which relates to the extant MLLR will need amending accordingly.</p> <p><b>Condition – The CAA will need to review the inter-unit agreements prior to implementation.</b></p>	
2.21	Where terminal and en-route structures adjoin, is the effective integration of departure and arrival routes achieved?	N/A



	N/A
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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:	
	<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>	N/A
	There are no changes to comms as a result of this proposal.	
	<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? For example, for nav aids, has coverage assessment been made, such as a DEMETER report, and if so, is it satisfactory?</li> </ul>	N/A
	There are no changes to nav aids as a result of this proposal.	
	<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>	YES
	<p>There are no changes to surveillance equipment as a result of this change. However, it is noted that both EGGP and EGCC will have to make changes to their radar displays, should the proposed change be approved. There will no longer be a requirement to sqk 7366 for entry and as such a decrease in the number of airspace infringements is expected as a result of this proposal. Frequency monitoring codes (FMC) will remain highly recommended when operating in the vicinity of an aerodrome which operates such a code.</p> <p><b>Condition – The CAA will expect the radar displays to be updated prior to implementation.</b></p>	

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?	N/A
	There is no anticipated growth in usage of the structure as a result of the change. The CAA will monitor the outcomes of the changes if approved.	

4.	Maps/charts/diagrams	Status
4.1	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 aeronautical cartographical standards (see airspace change guidance), rather they should be clear and unambiguous and reflect precisely the narrative descriptions of the proposals.)	YES
	Yes.	
4.2	Do the charts clearly indicate the proposed airspace change?	YES
	Yes.	
4.3	Has the change sponsor identified AIP pages affected by the change proposal and provided a draft amendment?	YES
	Yes.	
4.4	Has the change sponsor completed the WGS84 spreadsheet and submitted to the CAA for approval?	YES
	A CAP1054 compliancy spreadsheet has been submitted for approval.	

5.	Operational impact	Status
5.1	<p>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?</p> <p>Consideration should be given to:</p>	
	a) Impact on IFR General Aviation traffic, on Operational air traffic or on VFR General Aviation traffic flow in or through the area.	YES
	<p>The proposed changes are intended to take account of the current airspace users who utilise the airspace known as the MLLR and not to significantly amend which airspace users might utilise the proposed RA. Therefore, the impact on extant users should be minimal and positive, in terms of reducing the risk of a MAC and reducing the possibility of infringing the adjacent CAS (if approved) or inadvertently entering the RA whilst not adhering to the proposed conditions, given the clarity of the rules and the possible legal consequence of doing so.</p>	
	b) Impact on VFR Routes.	YES
	<p>The extant MLLR can be considered as a VFR route which is important for the GA community for transiting between EGGP and EGCC. The route is used on average by circa 100 GA flights per week. The proposed changes simplify the airspace, provide a slightly wider corridor, and a higher ceiling for the MLLR. These changes are intended to continue the opportunity for VFR transits without a crossing clearance, without the need for an exemption to class D rules.</p>	
	c) Consequential effects on procedures and capacity, i.e. on SIDs, STARs, holds. Details of existing or planned routes and holds.	YES
	<p>The changes ensure that no published IFPs are impacted should the proposed changes be approved. Should the non-standard flight application procedure impact the SUA Authority, in terms of workload, then they are to inform the CAA so that the matter can be addressed.</p> <p><b>Condition - Should the level of applications impact the SUA Authority they will inform the CAA.</b></p>	
	d) Impact on airfields and other specific activities within or adjacent to the proposed airspace.	YES
	<p>The reclassification will also streamline operations at specific airfields, such as Hawksview and Barton, by removing the need for ATC clearances and simplifying communication procedures. NPAS, Helimed, Search and Rescue, and the King's Helicopter Flight operators will be exempt from visibility restrictions thus permitting continued operations at all times.</p>	
	e) Any flight planning restrictions and/ or route requirements.	N/A



	Due to the background classification, unless the operator is exempt (see above) then all flight must be VFR (plus 5km vis) and therefore there is no change to any flight planning requirements.	
5.2	Does the change sponsor consultation material reflect the likely operational impact of the change?	YES
	Yes, see the engagement and consultation assessment.	

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
<p>Yes, the CAP1991 process has been followed and the proposal provides a safe and efficient solution to the use of an exemption to standard class D rules. The RA structure creates a legally enforceable set of parameters for flight within its confines. This is required due to the identified risks associated with the adjacent CAS structures managed by EGGP and EGCC. The proposal will not cater for all types of airspace user; however, it will cater for the majority of airspace users who utilise the extant MLLR. The consequential impacts on the adjacent units have been considered and through engagement any agreements between EGGP and EGCC that require amending in order to facilitate the proposal, will be made.</p>		

RECOMMENDATIONS/CONDITIONS/PIR DATA REQUIREMENTS		Yes/No
Are there any Recommendations which the change sponsor <b>should try</b> to address either before or after implementation (if approved)? If yes, please list them below.		NO
Are there any Condition(s) which the change sponsor <b>must fulfil</b> either before or after implementation (if approved)? If yes, please list them below.		YES

All the conditions mentioned in this document are listed in full in the Decision Log.

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.

NO

Although this proposal is not subject to a CAP1616 Stage 7 post implementation review, under CAP1991 (paras 196-208) the CAA Airspace Classification Team will be expected to review the effectiveness of the change. As no controlling authority is proposed, only a SUA Authority (EGCC ATC), the CAA AR team will expect the adjacent units and other airspace users to utilise extant feedback mechanisms such as mandatory occurrence reporting (MORs) to provide data on the performance of the proposal if approved. We would expect the CAA Airspace Classification Team to produce a data report and conclusions on the changes within the timeframes described in CAP1991.

## General summary

The establishment of the EGR323 North West Transit Corridor would be based on the issuance of an SI from the DfT. A RA creates a structure that is intended to restrict the flight of certain aircraft in accordance with certain specified conditions. There are legal consequences for pilots that do not adhere to the conditions (see ANO Art 239 para 4), hence the purpose of a RA is to mitigate a higher risk. Therefore, the exemptions to the RA must be unambiguous and stipulated in the SI.

Para E5.1 of the [SARG Policy 133](#): Policy for the Establishment and Operation of Special Use Airspace makes this clear, '*...determination of the operational conditions and entry requirements for the RA should be achieved through safety management system processes conducted by the SUA Authority and other potentially impacted organisations depending on the reason for the establishment of the RA. These conditions may permit access to certain operators (such as police or air ambulance) or define a process by which aircraft could obtain approval for entry from the SUA Authority. These conditions should be summarised in the remarks column of AIP ENR 5.1*'. This does not mean that the conditions and entry requirements for the RA can be altered or offer an exemption once the SI is issued unless the SI is amended. EGCC ATC have been designated as the SUA authority, however, they will not be maintaining continuous oversight of the structure, which is not a requirement of an SUA Authority nor will they be wholly meeting the requirement in the SUA policy para 8.14, which states that the '*...SUA Authority is responsible for ensuring that appropriate processes and procedures exist to ensure the safe and efficient management and operation of the SUA it is responsible for*.' However, EGCC and EGGP were involved with the development of the RA exemptions as per para E5.1 of SARG Policy 133, they have considered the risks of the proposal and have accepted them.

EGCC have accepted that they will be the SUA Authority and as such they will not be exempt from the conditions of CAP740 Chapter 9, they will in accordance with SARG Policy 133 para E5.2 be exempt from some of the oversight activities under CAP 740, which will be agreed on a case-by-case basis. This will allow the CAA oversight of how the RA is operating and the process for allowing non-standard flights and to ensure that the exemptions of the RA are being upheld. The CAA has therefore made it a condition of approval, that the SI includes an exemption that stipulates the process to grant access to 'other aircraft' is 'in accordance with permission granted by Manchester Airport ATC, via the NATS Non-Standard Flight (NSF) application procedure'. This process should ensure that such requests are only in extremis and that the CAA will have some oversight of how these applications are being dealt with, as required. If the requests for CTR transits, or non-standard flights through the structure begin to impact the SUA Authority, they must inform the CAA so that the matter can be addressed.

The EGR323 North West Transit Corridor will enforce the conditions stipulated upon the pilots; however, the ability to carry out enforcement action (See CAP1074) will be dependent on any violation been seen, recorded and an ABNAL/MOR being filed if required. In class G airspace, pilots are expected to adhere to [SERA.6001 \(7\)](#) speed and visibility minima ([VMC SERA.5001](#)) for their own safety and that of other pilots. In this case, the RA restrictions are intended to mitigate risks associated with adjacent activities in CAS, which is arguably a higher threshold. Therefore, the RA has legally binding restrictions, implemented under the ANO, that are different to standard class G rules and the consequences of breaking the rules must be proportionate given the increased risks.



The EGR323 North West Transit Corridor, if managed in accordance with the exemptions, will maintain a high standard of safety for traffic that utilised the extant MLLR, and given that EGCC cannot provide an ATCS, it ensures the correct classification in accordance with ICAO SARPs.

Comments and observations
NIL

Operational assessment sign-off	Name	Signature	Date
Operational assessment completed by Airspace Regulator (Technical)	[REDACTED]	[REDACTED]	5 Nov 24
Operational assessment approved by Manager Airspace Regulation	[REDACTED]	[REDACTED]	17 Nov 24
Manager Airspace Regulation Comments: Comments noted in the decision Log			
Head AAA comment / decision	Name	Signature	Date
Operational assessment conclusions approved by Head AAA Comments noted in the decision log	[REDACTED]	[REDACTED]	18 Nov 24

**Head AAA comments and regulatory decision:**

Comments noted in the Decision Log