



## **SAFETY AND AIRSPACE REGULATION GROUP**

Airspace Regulation and ATM

08 November 2024

### **CAA LETTER OF ACCEPTANCE FOR ACP RCL 2024-001 STAGE 5 SAFETY REVIEW**

The CAA has reviewed the sponsor's safety assessment for RCL 2024-001 MLLR. Under CAP 1616 Stage 5, this letter serves as the summary of the CAA's safety review for this proposal. The changes proposed to airspace design must, 'maintain a high standard of safety in the provision of air traffic services'<sup>1</sup>. Accordingly, the proposal will not be accepted unless it improves or maintains safety. The proposal, if approved, will not introduce an ATS in the RA structure.

The ATS Inspectors are content both Liverpool (EGGP) and NATS Manchester (EGCC) ANSPs have engaged with the AMS team to reach a suitable airspace design and agreed their final option for the reclassification to Class G airspace using their own Safety Management Systems.

The change in airspace classification for the extant MLLR, managed by the CAA AMS team, ensured the current non-compliance with SERA regulations were addressed and a suitable outcome agreed with stakeholders. If approved, airspace access will not be controlled by either unit, the ATS inspectors are satisfied that the due process under CAP1991 has been completed and that management of change has been conducted in accordance with UK Regulation (EU) 2017/373 ATM/ANS.OR.A.040.

The review has considered, but was not limited to the following key areas:

#### **In respect of air traffic control resource and infrastructure at EGGP and EGCC**

The CAA is satisfied that the ACP sponsor has demonstrated that the ACP will be safely supported through air traffic control resource and infrastructure.

This proposal will not create a structure that requires the provision of an ATS. Subject to meeting the conditions stipulated below, the adjacent ANSPs (EGCC and EGGP ATC) will maintain a high a standard of safety with regard to their required service provision.

#### **In respect of air traffic control procedures at EGGP and EGCC**

The CAA is satisfied that the ACP sponsor has demonstrated safety regarding the concept of operations. The proposed structure will not impact any published instrument procedures at EGGP or EGCC. However, there will be a requirement to conduct a training needs analysis for the controllers at EGGP and EGCC and to update the required radar screens. The CAA are content that mature procedure changes (MATS Part 2 and LoAs where appropriate) should be captured with the ANSPs existing and approved Change Management System and SMS processes and will have regulatory oversight and approval, where appropriate, prior to introduction. The CAA considered the buffer requirement under Annex H of SARG Policy 133: Policy for the Establishment and Operation of Special Use Airspace. We concluded that there is no requirement for a buffer between the adjacent airspace, as the proposed structure is expected to provide an airspace volume which should safely and efficiently facilitate transits.

#### **In respect of the airspace design and its effect on adjacent units**

In this respect, the CAA is satisfied that the ACP sponsor has demonstrated safety. The SI issued under the ANO will ensure that only aircraft meeting the criteria stipulated can use the RA structure. There will be a requirement for good airmanship and for any rule breaking to be dealt with proportionately. The SUA Authority (EGCC ATC) and other adjacent units will be expected to file MORs and report any trends to the CAA.

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<sup>1</sup> S.70(1) Transport Act 2000

### Conditions of acceptance

The CAA has the following conditions that must be met prior to implementation:

- 1) Inter-unit agreements must be finalised and submitted to the CAA for review.
- 2) 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).
- 3) At least 28 days before implementation, evidence of the completion of outstanding controls and mitigations to be supplied to the CAA.
- 4) 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.
- 5) 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.
- 6) The impacted units radar displays must be updated.
- 7) The SI will stipulate that non-standard flights can use the RA in accordance with permission granted by EGCC ATC, following acceptance under the NATS NSF application procedure.

### Conclusion

The CAA has reviewed the ACP sponsor's safety assessment and is satisfied that the proposed changes meet the safety requirement under s70(1) Transport Act 2000, with respect to the provision of air traffic services at the impacted units.

This acceptance does not mean that the ACP has been approved. Before approving an ACP, the CAA must consider all the presented material factors<sup>2</sup> and have regard to them as a whole.

CAA ATS Inspector/Technical  
Airspace Regulator

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<sup>2</sup> S.70(2) Transport Act 2000