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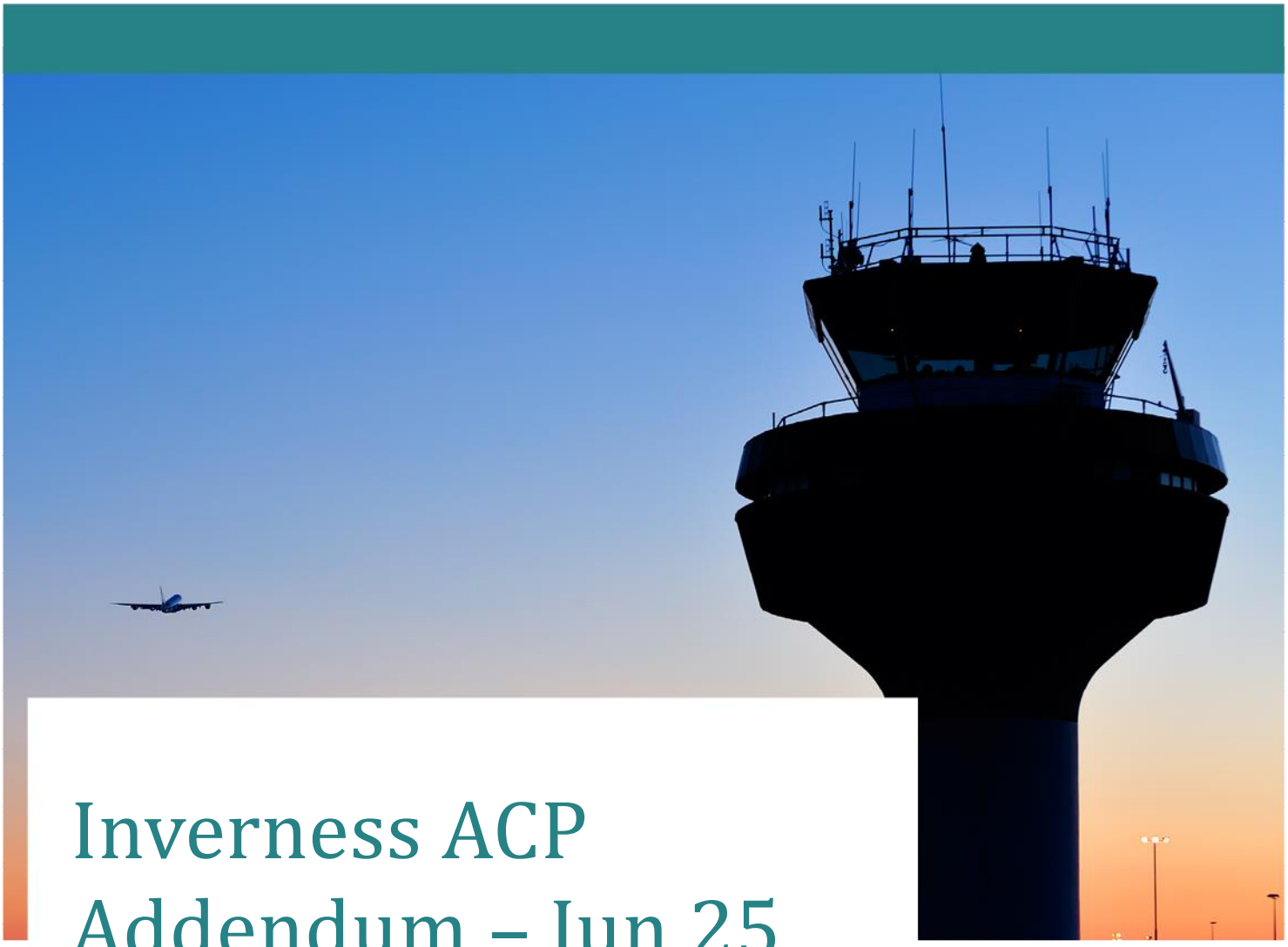

Inverness ACP Addendum – Jun 25

June 2025

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Executive summary

Inverness Airport supports a vital and effective national and international flight network to both the local community and wider Highlands area. Highlands and Islands Airports Limited (HIAL), owner and operator of Inverness Airport, has identified the need for changes to the current arrangements and procedures in the immediate airspace surrounding Inverness Airport. These changes are being driven by advances in Air Traffic Management (ATM), airliner navigation and routing procedures plus General Aviation (GA) navigation. The purpose of the changes being proposed is to ensure that environmental and economic benefits are achieved through efficient use of surrounding airspace and procedures, protecting critical stages of flight following departure and before arrival for Instrument Flight Rules (IFR) commercial air transport flights and arrival for Visual Flight Rules (VFR) flights.

The original ACP submission was submitted in 2017. It is important to note that the dimensions of the Class D and Class E+ Transponder Mandatory Zone (TMZ) **have not changed** since the ACP submission was made. Delays in the progression of this ACP have been caused primarily by the effects of COVID-19 and this was articulated in the Inverness ACP Addendum that was published in June 2024 that notified of some amendments to the Instrument Flight Procedures.

The purpose of this Addendum document is to provide a further update regarding the original ACP submission and provide details of a proposal by Inverness for implementation of a Temporary Segregated Area (TSA) for operations by the Highland Hang Gliding and Paragliding Club (HHGPC) at Alturlie Point and to set out details of stakeholder engagement and the training of ATC personnel.

Contents

1 Alturlie Point Operations 5

1.1 Background 5

1.2 Inverness Proposal for Safe Operations of Paragliders in Class D Airspace 5

1.3 Rationale for a Temporary Segregated Area (TSA) 6

1.4 Conclusion 7

2 Engagement Update 8

2.1 Background 8

2.2 NATS Prestwick Centre 8

2.3 Defence Airspace Air Traffic Management (DAATM) 8

2.4 RAF Lossiemouth 8

2.5 Highland Hang-Gliding and Para-Gliding Club (HHGPC) 8

2.6 Cairngorm Gliding Club (CGC) 9

2.7 Inverness Local Airfield Users engagement 9

3 ATC Personnel Training Update 10

1 Alturlie Point Operations

1.1 Background

Inverness Airport is undertaking a significant Airspace Change Proposal (ACP) to transition from Class G airspace to Class D and E+ airspace to enhance the protection of its operations and improve air traffic management efficiency. A key area impacted by this expansion is the area currently known locally as the 'Alturlie Box,' which is within Class G airspace around Alturlie Point and referenced within the United Kingdom (UK) Civil Aeronautical Information Publication (AIP)[1] data for Inverness Airport. This area is a known and established operational site for the Highland Hang Gliding and Paragliding Club (HHGPC) paragliders who have operated at Alturlie Point for many years. At present, a Letter of Agreement (LoA) is in force between Inverness ATC and HHGPC for operations in Class G airspace between dawn and dusk. The location of the 'Alturlie Box' can be seen in Figure 1 below.

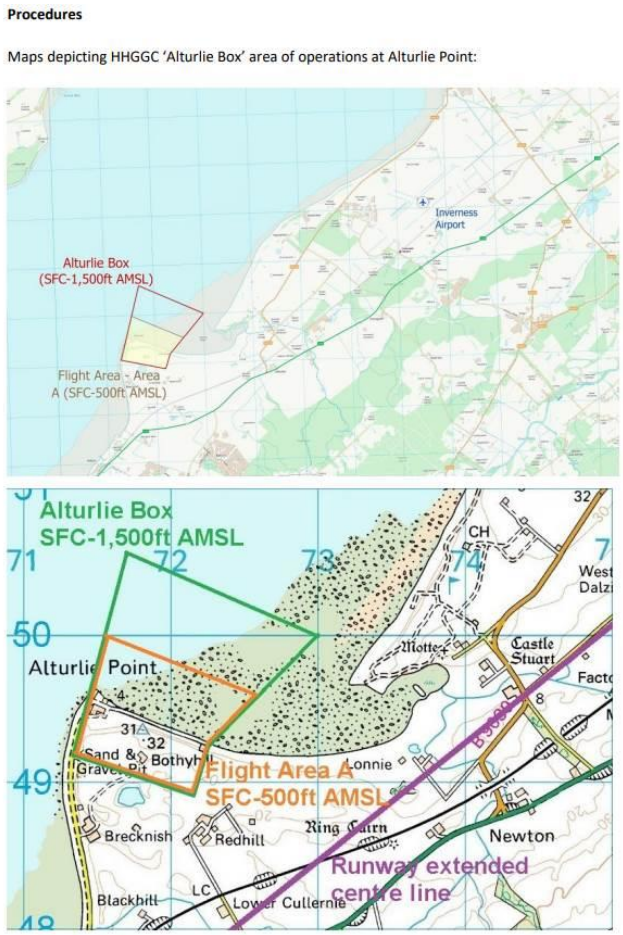

Figure 1 Alturlie Box current location

1.2 Inverness Proposal for Safe Operations of Paragliders in Class D Airspace

HIAL have conducted an Operational Risk Assessment that evaluates the proposed reclassification of the current 'Alturlie Box' paragliding area which is currently located within Class G airspace, to how it considers it could operate within Class D airspace, as part of a broader airport airspace change process, under the Airspace Change Proposal (ACP) for Inverness Airport, ACP-2014-04. The initial reclassification of the 'Alturlie Box' to lie within Class D presented a significant challenge, specifically concerning the mandatory radio carriage requirement, which the established paragliding community,

[1] EGPE AD 2.20 LOCAL AERODROME REGULATIONS WARNINGS 4g

via the HHGPC previously stated they could not meet. Following recent extensive stakeholder engagement and feedback including with local airspace users, a Temporary Segregated Airspace (TSA) has been proposed by HIAL as a critical mitigation strategy. The Operational Risk Assessment highlights the risks inherent in the initial Class D proposal without specific accommodation for paragliders and demonstrates how the proposed TSA effectively addresses these, enhancing safety for all airspace users, managing crucial stakeholder relationships, aligning with regulatory requirements and the intended goals of the Inverness ACP.

The initial ACP outlined the reclassification of the 'Alturlie Box' as part of the new Class D airspace, and a LoA was identified within the initial Safety Case to cater for this activity. Since the adoption of SERA 6001[2], the rules for operating within Class D airspace have changed. This change inherently mandates that all aircraft operating within Class D airspace must carry and use a radio for communication with Air Traffic Control (ATC).

The proposed reclassification of the airspace from Class G to Class D has raised concerns, particularly within the paragliding community and has been fed back to Inverness via HHGPC, regarding the practical implications of mandatory radio carriage. In light of this feedback, having consulted SARG Policy 133 dated 26th February 2024, the implementation of TSA has been identified by HIAL as the only viable mitigation strategy to meet the requirements of SERA 6001. This approach is critical for the ACP to advance, while simultaneously ensuring that HHGPC operations can continue safely and enable ongoing access in Class D airspace for HHGPC activity, whilst meeting the requirements of SERA 6001 (d).

Under the initial ACP, the 'Alturie Box' would become standard Class D airspace. This reclassification introduces a fundamental change for paraglider operations within the specific area. Of all of the additional requirements, the mandatory requirement to carry and use a radio for communication with ATC has been highlighted as problematic by a key stakeholder.

HHGPC, as a key stakeholder, following engagement, have unequivocally stated that equipping their paragliders with radios is not a feasible option for their operations due to various factors (e.g., cost, equipment weight, power requirements, operational philosophy). This presents an operational challenge and a safety risk, and HIAL is keen to be able to facilitate their operations and ensure the safety of all other operations in the close vicinity should a positive decision be made regarding the Inverness ACP by the CAA.

1.3 Rationale for a Temporary Segregated Area (TSA)

The initial proposal to simply reclassify the 'Alturlie Box' to Class D airspace, without specific provision for paragliders, presents critical unmitigated risks, primarily stemming from the mandatory radio carriage requirement which cannot be met by the paragliding community. These risks include severe safety concerns (mid-air collision), significant ATC workload issues, and detrimental stakeholder relations.

The implementation of the TSA is the preferred and recommended solution for Inverness to safely manage operations in the Alturie Box within the proposed Inverness Class D Control Zone (CTR).

The rationale is compelling:

- **Directly Addresses the Radio Carriage Issue:** The TSA provides a specific, legally recognised framework for paragliders to operate without radio, eliminating the primary conflict points identified in the initial Class D proposal. This ensures compliance with regulations while allowing traditional paraglider operations to continue.
- **Enhances Safety for All Airspace Users:** By segregating paraglider operations into a known, published area from which radio-equipped aircraft are explicitly required to remain clear, the TSA drastically reduces the risk of mid-air collision and provides significantly increased safety margins for both paragliders and powered aircraft. This aligns directly with the CAA's mandate under S.70 of the Transport Act 2000 to maintain a high standard of safety.

[2] https://www.caa.co.uk/uk-regulations/aviation-safety/basic-regulation-the-implementing-rules-and-uk-caa-amc-gm-cs/sera-standardised-rules-of-the-air/

- **Effective Stakeholder Management:** The proposed TSA is a direct and positive response to the concerns raised by the paragliding community. By providing a viable and accommodating solution, the airport has demonstrated a commitment to collaborative airspace management, flexible use of airspace and fosters positive relations ensuring buy-in from key stakeholders. This mitigates the significant risk of non-compliance and reputational damage.
- **Facilitates Airspace Introduction Objectives:** The proposed TSA will allow the airport to successfully proceed with its broader Class D introduction, achieving its goal of enhanced protection and traffic management without being restricted by specific operational constraints of a particular airspace user. It represents a pragmatic integration of diverse airspace user needs within a more controlled environment, utilising a framework supported by SARG Policy 133.
- **Reduced Overall Risk:** The residual risks associated with the TSA have been identified to be significantly lower and more manageable than the unmitigated risks forcing non-radio equipped paragliders into standard Class D airspace.

1.4 Conclusion

The Inverness Operation Risk Assessment strongly recommends the formal adoption and implementation of a TSA for the ‘Alturie Box’ within the proposed Class D airspace. This approach proactively addresses the identified challenges, ensures the continued safe operation of paragliders, satisfies regulatory requirements, and facilitates the successful and efficient introduction of Inverness Airport’s controlled airspace.

2 Engagement Update

2.1 Background

HIAL Inverness and the ACP Project Team have continued to engage with all stakeholders (both aviation and non-aviation) to ensure that they are kept informed of the progression of the ACP. Updates regarding the ACP have been briefed at the Inverness Airport Consultative Committee that occurs quarterly and the Inverness Senior Air Traffic Control Officer (SATCO) has continued to attend the Regional Airspace Users Working Group (RAUWG) held by RAF Lossiemouth. The Project Team also met with Inverness local airfield users and conducted face to face briefings in person and over Teams. Information and updates regarding the ACP have also been published on the HIAL Inverness website. Email communications have also been sent out by Inverness Airport to stakeholders where appropriate.

Work has also continued with Stakeholders to formalise and agree on DRAFT LoAs to ensure that the ACP can be implemented safely. Key engagement opportunities are highlighted below.

2.2 NATS Prestwick Centre

The Project Team have been engaged with the Procedures Manager at Prestwick Centre and some minor amendments to the existing LoA will be required. A workshop is anticipated to take place in late August to ensure that any changes can be implemented safely, subject to a positive ACP decision.

2.3 Defence Airspace Air Traffic Management (DAATM)

The Project Team have continued to engage with representatives from DAATM and RAF Lossiemouth, most recently to discuss the ACP in April 25. DAATM have continued to support RAF Lossiemouth in finalising the Letter of Agreement and providing further support to RAF Lossiemouth in attaining Enhanced ATSU status as required.

2.4 RAF Lossiemouth

The RAF Lossiemouth newly appointed SATCO and their representative have received update briefings from the ACP Project Team and were provided with an ACP update brief at the RAUWG that was hosted by RAF Lossiemouth and held over MS Teams on 12th June 2025.

The ACP Project team has also been engaged with the SATCO and key ATC personnel with regards to the Inverness and Lossiemouth LOA and RAF Lossiemouth achieving Enhanced Air Traffic Service Unit (ATSU) status. Procedures have been discussed and agreed relating to a revised draft mature LOA, which is due to be reviewed further by DAATM and the Military Aviation Authority (MAA) and will ensure that safe and workable procedures are implemented to enable airspace access in line with the FUA concept.

2.5 Highland Hang-Gliding and Para-Gliding Club (HHGPC)

The Project Team has been engaged with the HHGPC regarding their current operations at Alturlie Point. Since the last Addendum, the LoA for operations in Class G airspace has been implemented and work to achieve agreement for a LoA for operations in Class D airspace is currently being conducted. Following a positive meeting between Bristow Helicopters and HHGPC on 13th June 2025, discussions regarding downwash criteria are currently being investigated by HHGPC and the results of the findings will be utilised to confirm the dimensions of the proposed TSA which will also be updated in the LoA.

2.6 Cairngorm Gliding Club (CGC)

The LOA with Cairngorm Gliding Club has been agreed in draft. This LOA will be formalised when the result of the CAA Decision is announced.

2.7 Inverness Local Airfield Users engagement

HIAL has continued to provide updates to its stakeholders via engagement meetings, through email and on the HIAL Inverness website. The Project Team met with the following users during the week commencing Monday 9th June 2025 which was an ideal time to discuss the proposed TSA and obtain their feedback. Operators who were briefed included:

- Bristow SAR Helicopters
- Highland Aviation
- Gama Aviation (Helimed)
- PDG Helicopters
- AirTask (Watchdog)

It was agreed that should a positive decision be granted by the CAA then the Project Team and SATCO Inverness would provide further briefings to all operators prior to implementation of the proposed Class D Airspace.

In addition to the above operators, Easyjet and Loganair have also been involved in the ground flight validation of the Instrument Flight Procedure designs that is in the process of being finalised and will be completed on 3rd July 2025.

3 ATC Personnel Training Update

The training of the controlling cadre at Inverness Airport is planned to commence in September 2025 and will be conducted by a third-party provider subject to a positive decision. A newly updated ATC simulator has been installed in the ATC Tower at Inverness, and this will enable the ATC staff to familiarise themselves with the procedures prior to undergoing formal training. The ATS Inspector for Inverness in addition to approving the ATC Simulator for use for ACP training, has been briefed by the SATCO and the Project Team about the training plan and exercises and shall be further consulted as the plan is further developed during July 2025.

It is anticipated that all members of the controlling staff and assistants will have undergone the appropriate simulator and classroom training exercises before implementation of the Airspace Change. This will ensure that a seamless transition for safe operations within controlled airspace can take place in November 2025.