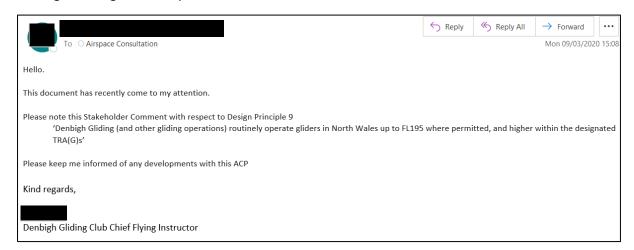
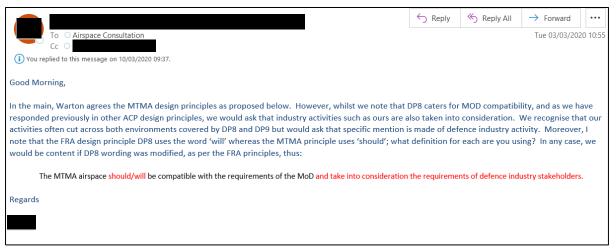
Denbigh Gliding Club Response



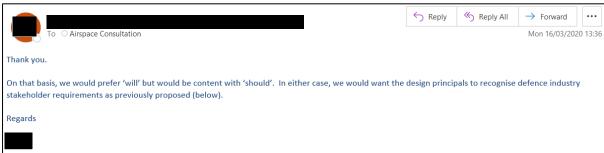
BAE Warton Response



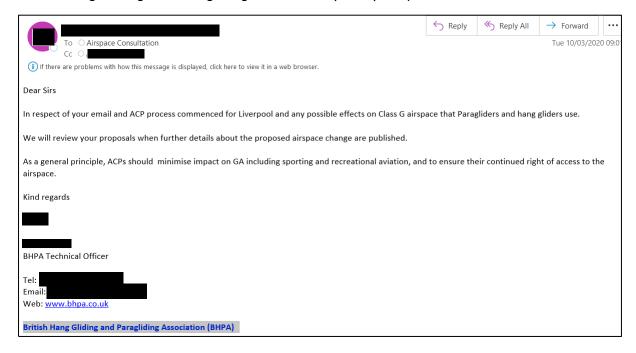




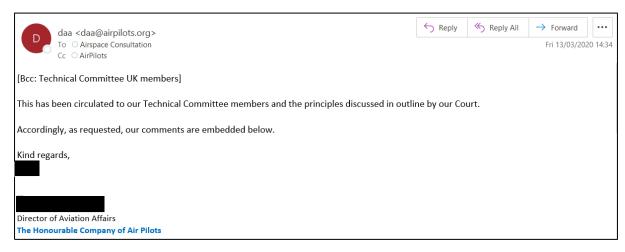




British Hang Gliding and Paragliding Association (BHPA) Response



The Honourable Company of Air Pilots (HCAP) Response

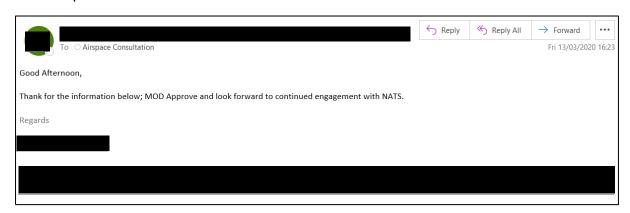


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No	Design Principle	Category	Notes	Stakeholder Comments
1	The airspace will maintain or enhance current levels of Safety.	Safety		This should remain as No 1 but it must apply to overall safety, to account for any adverse impact on the safety of aircraft operating outside controlled airspace. Thus, the safety appraisal must also look at whether the changes making inadvertent infringement more likely (perhaps because of increased complexity as well as changed boundaries) or increase the mid-air collision risk of aircraft operating outside the new vertical and lateral boundaries.
2	The proposed airspace will maintain or enhance operational resilience of the ATC network	Operational		
3	The proposed airspace design will yield the greatest capacity benefits from systemisation	Operational		
4	The MTMA airspace design will provide a compatible and optimised interface between the Free Route Airspace (FRA) and ATS network.	Technical		
5	The proposed MTMA airspace will facilitate optimised network economic performance.		this includes track mileage/ fuel-burn/ route charges	
6	The proposed MTMA airspace will facilitate the reduction of CO2 emissions per flight	Environmental		This principle should be combined with current principles 7 & 14 into a new Principle No 3 so that environmental issues are given appropriate priority.
7	Minimise environmental impacts to stakeholders on the ground (note: network changes are >7,000ft, the position of the	Environmental		This principle should be combined with current principles 6 & 14 into a new Principle No 3 so that environmental issues are given appropriate priority.

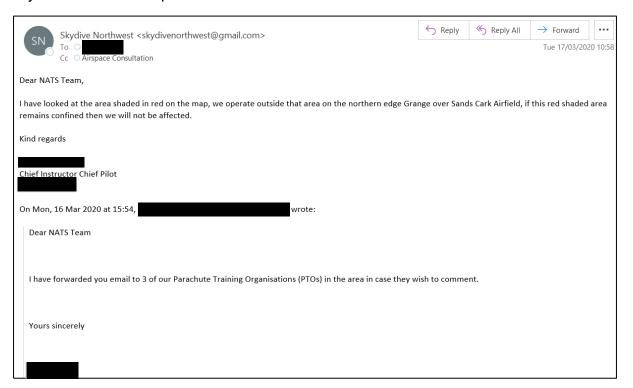
 Design Principle	Category	Notes	Stakeholder Comments
interface with the airport's lower level routes will be determined by the airport, hence impacts below 7000ft will be addressed in the separate airport sponsored ACP)			
The MTMA airspace should be compatible with the requirements of the MoD.	Operational		
The impacts on GA and other civilian airspace users due to MTMA should be minimised.	Operational	Consider where impacts might be greatest by considering known VFR significant areas and Military-use areas against placement of airspace structures	This is important principle. UK airspace is a national resource that needs to be shared across the entire user base, including GA, drone and military operators. Where necessary, additional controllers/control stations should be provided to ensure that current GA (and military) activity levels can be sustained while also providing for the needs of future drone operations.
The volume of controlled airspace required for the MTMA should be the minimum necessary to deliver an efficient airspace design, taking into account the needs of UK airspace users	Technical	This may include releasing CAS as appropriate	
The route network linking Airport procedures with the enroute phase of flight will be spaced to yield maximum safety and efficiency benefits by using an appropriate standard of PBN.	Technical	Where appropriate, the use of RNP should be considered if the fleet mix can support it.	
provide a compatible and optimised interface with London Airspace Modernisation Programme (LAMP) design	Technical	Closely spaced routes across the interface.	
Must accord with the CAA's published Airspace Modernisation Strategy (CAP1711) and any current or future plans associated with it.	Policy	The CAA have stated that this DP is required by all change sponsors. CAP1711 describes what airspace modernisation	

No	Design Principle	Category	Notes	Stakeholder Comments
	The airspace should introduce improved Continuous Climb Operations (CCO) and Continuous Descent Operations (CDO) for all aircraft	Environmental	Airlines (Lead Operator Panel 04/12/19).	Where the requirements of CCO and CDO conflict, CCO should have priority, as this provides the greatest alleviation of environmental impact. This principle should be combined with current principles 6 & 7 into a new Principle No 3 so that environmental issues are given appropriate priority.
	Add further suggested Design Principles HERE.			

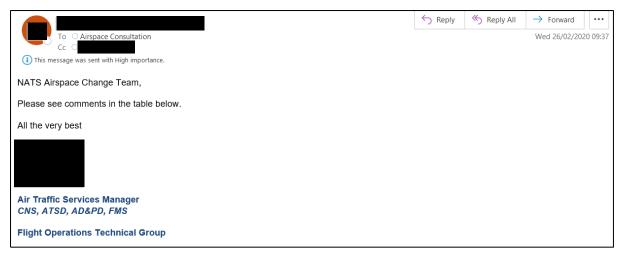
MoD Response



Skydive Northwest Response



Airlines UK Response

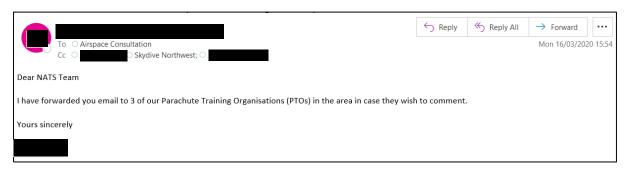


No	Design Principle	Category	Notes	Stakeholder Comments
1	The airspace will maintain or enhance current levels of Safety.	Safety		Agreed
	The proposed airspace will maintain or enhance operational resilience of the ATC network			Agreed

No	Design Principle	Category	Notes	Stakeholder Comments
3	The proposed airspace design will yield the greatest capacity benefits from systemisation	Operational		Agreed
4	The MTMA airspace design will provide a compatible and optimised interface between the Free Route Airspace (FRA) and ATS network.	Technical		Agreed
5	The proposed MTMA airspace will facilitate optimised network economic performance.	Economic	this includes track mileage/ fuel-burn/ route charges	Agreed
6	The proposed MTMA airspace will facilitate the reduction of CO ₂ emissions per flight	Environmental		Agreed
7	·	Environmental		Agreed
8	· · · · · · · · · · · · · · · · · · ·	Operational		Agreed
9	The impacts on GA and other civilian airspace users due to MTMA should be minimised.	Operational	Consider where impacts might be greatest by considering	
10	The volume of controlled airspace required for the MTMA should be the minimum necessary to deliver an efficient airspace design, taking into account the needs of UK airspace users	Technical	releasing CAS as appropriate	Consider this very carefully before giving it away as once gone it is very difficult to get it back. You need to be very careful with release of CAS. The problem is that things change and a piece of CAS that may appear not to be require/used at the moment may be needed in the future and once given away it is a very expensive and difficult process to get it back.
11	The route network linking Airport procedures with the enroute phase of flight will be spaced to yield maximum safety and efficiency	Technical	Where appropriate, the use of RNP should be	Agreed.

No	Design Principle	Category	Notes	Stakeholder Comments
INO	benefits by using an appropriate standard of PBN.	Category	considered if the fleet mix can support it.	Stakeholder Comments
12	The MTMA airspace design will provide a compatible and optimised interface with London Airspace Modernisation Programme (LAMP) design	Technical	Closely spaced routes across the	Agreed
13	Must accord with the CAA's published Airspace Modernisation Strategy (CAP1711) and any current or future plans associated with it.	Policy	The CAA have stated that this DP is required by all change sponsors. CAP1711 describes what airspace modernisation must deliver including: - the need to increase aviation capacity; - growth to be sustainable; - the need to maximise the utilisation of existing runway capacity.	Agreed
14	improved Continuous Climb Operations (CCO) and Continuous Descent Operations (CDO) for all aircraft		Feedback from Airlines (Lead	Agreed
	Add further suggested Design Principles HERE.			

British Skydiving Response



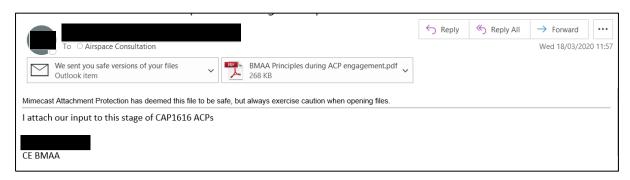
Airfield Operators Group (AOG) Response



British Balloon and Airship Club (BBAC) Response



British Microlight Aircraft Association (BMAA) Response





British Microlight Aircraft Association Policy for Design Principles during ACP engagement

Introduction

The following text describes the underlying principles that the British Microlight Aircraft Association (BMAA) believes must be followed by applicants for airspace change proposals.

Consultation

- The BMAA welcomes the opportunity to engage in consultation at an early stage within the ACP CAP 1616 process.
- Sponsors are encouraged to engage with the BMAA and its members as early as possible during the development of the ACP. Previous ACPs have missed the opportunity for early engagement and dialogue resulting in significant and costly delays.

Airspace classification

- The BMAA considers that the UK airspace's default classification is G and that sponsors
 must establish a safety case for proposing to change this class or add any further
 restrictions or requirements by their ACP.
- All sponsors must demonstrate that alternatives have been considered such as RMZ and TMZ before considering controlled airspace.
- Where Class E is proposed, without a TMZ or RMZ should be considered as the default option.

Access by GA

- Sponsors must accept the assumption that GA including sporting and recreational aviation is entitled to continued safe use of airspace and that commercial aviation does not have a right to limit airspace access.
- Sponsors should ensure that there will be measures to allow flexible use of airspace and prepare for the wider use of electronic conspicuity devices and interoperability with existing e-conspicuity, e.g. FLARM and Pilot Aware etc...



Airspace volume

- In line with the principles of the Airspace Modernisation (was FAS) principles the ACP must respect the requirement for minimum airspace volumes designed for efficiency and reduced environmental impact. These principles will include:
- · Minimum size of controlled airspace
- · Minimum number of departure/arrival routes
- Steeper and continuous climbs and descents for cost and environmental benefits as well as minimisation of CAS footprint.

Justification

- Sponsors must conduct and present proper analysis of overall airspace safety changes
 i.e. based on modelling and evidence rather than purely subjective opinion.
- Sponsors must provide proper validation of forecast traffic levels. There is an expectation that data used, particularly forecasts, will be verifiable including details of any and all assumptions.

Airspace integration

- Sponsors must show how they are integrating their proposal within the overall UK
 airspace modernisation context, for example proposals which do not connect efficiently
 between upper and lower airspace (potentially under different airspace "management")
 would only inhibit overall airspace efficiency and therefore not receive our support)
- 2. Optimisation of the development work above and below the 7,000ft NATS en-route split.

Manchester Airport Response

