

Denbigh Gliding Club Response

To: Airspace Consultation

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Mon 09/03/2020 15:08

Hello.

This document has recently come to my attention.

Please note this Stakeholder Comment with respect to Design Principle 9
'Denbigh Gliding (and other gliding operations) routinely operate gliders in North Wales up to FL195 where permitted, and higher within the designated TRA(G)s'

Please keep me informed of any developments with this ACP

Kind regards,

Denbigh Gliding Club Chief Flying Instructor

BAE Warton Response

To: Airspace Consultation
Cc:

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Tue 03/03/2020 10:55

📌 You replied to this message on 10/03/2020 09:37.

Good Morning,

In the main, Warton agrees the MTMA design principles as proposed below. However, whilst we note that DP8 caters for MOD compatibility, and as we have responded previously in other ACP design principles, we would ask that industry activities such as ours are also taken into consideration. We recognise that our activities often cut across both environments covered by DP8 and DP9 but would ask that specific mention is made of defence industry activity. Moreover, I note that the FRA design principle DP8 uses the word 'will' whereas the MTMA principle uses 'should'; what definition for each are you using? In any case, we would be content if DP8 wording was modified, as per the FRA principles, thus:

The MTMA airspace **should/will** be compatible with the requirements of the MoD **and take into consideration the requirements of defence industry stakeholders.**

Regards

From: Airspace Consultation <airspaceconsultation@nats.co.uk>
Sent: 10 March 2020 09:38
To: Airspace Consultation <airspaceconsultation@nats.co.uk>
Cc:
Subject: RE: NATS FASI-N MTMA Liverpool ACP Design Principles

PHISHING ALERT

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Dear

Thank you very much for your prompt response.

Before we start to analyse the feedback received, I just wanted to confirm that you are requesting that the word 'should' is replaced with 'will', rather than including both in the DP wording?

*"The MTMA airspace **should/will** be compatible ..."*

Kind regards,

To: Airspace Consultation

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Tue 10/03/2020 12:20

📌 You replied to this message on 13/03/2020 11:11.

Hi there.

Firstly, I was trying to understand what is the NATS definition of 'will' and 'should'. Depending on that answer, that will drive which of the two should be used; I wasn't suggesting both.

Regards

AC
Airspace Consultation
To: [Redacted] Airspace Consultation
Fri 13/03/2020 11:12

Hi [Redacted]

Thank you for getting back to me.

The difference in words reflects a difference in priority i.e. the word "will" implies a mandatory Design Principle such as ensuring safety, whereas "should" does not. The word "should" could be used for a principle where a compromise may be required – such as impact on other airspace users – but NATS could state compliance where possible.

I hope that helps but please let me know if you have any further questions.

Kind regards,
[Redacted]

[Redacted]
To: Airspace Consultation
Mon 16/03/2020 13:36

Thank you.

On that basis, we would prefer 'will' but would be content with 'should'. In either case, we would want the design principals to recognise defence industry stakeholder requirements as previously proposed (below).

Regards
[Redacted]

British Hang Gliding and Paragliding Association (BHPA) Response

[Redacted]
To: Airspace Consultation
Cc: [Redacted]
Tue 10/03/2020 09:00

[If there are problems with how this message is displayed, click here to view it in a web browser.](#)

Dear Sirs

In respect of your email and ACP process commenced for Liverpool and any possible effects on Class G airspace that Paragliders and hang gliders use.

We will review your proposals when further details about the proposed airspace change are published.

As a general principle, ACPs should minimise impact on GA including sporting and recreational aviation, and to ensure their continued right of access to the airspace.

Kind regards
[Redacted]
[Redacted]
BHPA Technical Officer

Tel: [Redacted]
Email: [Redacted]
Web: www.bhpa.co.uk

British Hang Gliding and Paragliding Association (BHPA)

The Honourable Company of Air Pilots (HCAP) Response

daa <daa@airpilots.org>
 To Airspace Consultation
 Cc AirPilots

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Fri 13/03/2020 14:34

[Bcc: Technical Committee UK members]

This has been circulated to our Technical Committee members and the principles discussed in outline by our Court.

Accordingly, as requested, our comments are embedded below.

Kind regards,
[REDACTED]


[REDACTED]
 Director of Aviation Affairs
 The Honourable Company of Air Pilots

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.	Economic	this includes track mileage/ fuel-burn/ route charges	
6	The proposed MTMA airspace will facilitate the reduction of CO ₂ 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.

No	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)			
8	The MTMA airspace should be compatible with the requirements of the MoD.	Operational		
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 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.
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	This may include releasing CAS as appropriate	
11	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.	
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 interface.	
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	

No	Design Principle	Category	Notes	Stakeholder Comments
			must deliver including: - the need to increase aviation capacity; - growth to be sustainable; - the need to maximise the utilisation of existing runway capacity.	
14	The airspace should introduce improved Continuous Climb Operations (CCO) and Continuous Descent Operations (CDO) for all aircraft	Environmental	Feedback from 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



[Redacted Name]

To ○ Airspace Consultation

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Good Afternoon,

Thank for the information below; MOD Approve and look forward to continued engagement with NATS.


Regards

[Redacted Signature]

[Redacted Contact Info]

Fri 13/03/2020 16:23

Skydive Northwest Response

 Skydive Northwest <skydivenorthwest@gmail.com>
 To: [Redacted]
 Cc: [Redacted] Airspace Consultation

↩ Reply ↩ Reply All ➔ Forward ⋮
 Tue 17/03/2020 10:58

Dear NATS Team,

I have looked at the area shaded in red on the map, we operate outside that area on the northern edge Grange over Sands Cark Airfield, if this red shaded area remains confined then we will not be affected.

Kind regards

[Redacted]
 Chief Instructor Chief Pilot
 [Redacted]

On Mon, 16 Mar 2020 at 15:54, [Redacted] wrote:

Dear NATS Team

I have forwarded you email to 3 of our Parachute Training Organisations (PTOs) in the area in case they wish to comment.

Yours sincerely

[Redacted]

Airlines UK Response

 [Redacted]
 To: [Redacted] Airspace Consultation
 Cc: [Redacted]

↩ Reply ↩ Reply All ➔ Forward ⋮
 Wed 26/02/2020 09:37

i This message was sent with High importance.

NATS Airspace Change Team,

Please see comments in the table below.

All the very best

[Redacted]

Air Traffic Services Manager
CNS, ATSD, AD&PD, FMS

Flight Operations Technical Group

No	Design Principle	Category	Notes	Stakeholder Comments
1	The airspace will maintain or enhance current levels of Safety.	Safety		Agreed
2	The proposed airspace will maintain or enhance operational resilience of the ATC network	Operational		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	Minimise environmental impacts to stakeholders on the ground (note: network changes are >7,000ft, the position of the 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)	Environmental		Agreed
8	The MTMA airspace should be compatible with the requirements of the MoD.	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 known VFR significant areas and Military-use areas against placement of airspace structures	Agreed
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	This may include 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
	benefits by using an appropriate standard of PBN.		considered if the fleet mix can support it.	
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 interface.	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	The airspace should introduce improved Continuous Climb Operations (CCO) and Continuous Descent Operations (CDO) for all aircraft	Environmental	Feedback from Airlines (Lead Operator Panel 04/12/19).	Agreed
	Add further suggested Design Principles HERE.			

British Skydiving Response

To: Airspace Consultation

Cc: Skydive Northwest;

← Reply ↶ Reply All → Forward ⋮

Mon 16/03/2020 15:54

Dear NATS Team

I have forwarded you email to 3 of our Parachute Training Organisations (PTOs) in the area in case they wish to comment.

Yours sincerely

Airfield Operators Group (AOG) Response

To: Airspace Consultation

← Reply ↶ Reply All → Forward ⋮

Tue 17/03/2020 07:55

Dear Sirs,

My apologies for missing the deadline. As you suspected I have no comments/objections.

Regards,

(NATMAC member, Chairman A.O.G.)

British Balloon and Airship Club (BBAC) Response

To: Airspace Consultation

← Reply ↶ Reply All → Forward ⋮

Tue 17/03/2020 11:22

I cannot find an 'approve' button.

I approve.

(BBAC)

British Microlight Aircraft Association (BMAA) Response

To: Airspace Consultation

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Wed 18/03/2020 11:57

We sent you safe versions of your files
Outlook item

BMAA Principles during ACP engagement.pdf
268 KB

Mimecast Attachment Protection has deemed this file to be safe, but always exercise caution when opening files.

I attach our input to this stage of CAP1616 ACPs

CE BMAA



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

1. The BMAA welcomes the opportunity to engage in consultation at an early stage within the ACP CAP 1616 process.
2. 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

1. 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.
2. All sponsors must demonstrate that alternatives have been considered such as RMZ and TMZ before considering controlled airspace.
3. Where Class E is proposed, without a TMZ or RMZ should be considered as the default option.

Access by GA

1. 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.
2. 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

1. 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

1. Sponsors must conduct and present proper analysis of overall airspace safety changes i.e. based on modelling and evidence rather than purely subjective opinion.
2. 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

1. 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

Approve - no further comments: NATS FASI-N MTMA Liverpool ACP Design Principles



To Airspace Consultation

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Thu 19/03/2020 18:58

i You replied to this message on 20/03/2020 07:59.
The sender responded: Approve - no further comments.