

Engagement Responses for Stage 1B MTMA EGCC/ EGNX Design Principles

Airfield Operators Group (AOG) Response



To  Airspace Consultation

 You replied to this message on 16/04/2020 11:22.

All seems perfectly sensible and logical.
Regards and thanks,
[redacted] (A.O.G.)


Sent from my iPhone


Wed 18/03/2020 14:52


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Association of Remotely Piloted Aircraft Systems UK (ARPAS-UK)

Re: NATS FASI-N MTMA Manchester/ East Midlands Airspace Change Proposal



To  Airspace Consultation

 You replied to this message on 16/04/2020 15:02.
If there are problems with how this message is displayed, click here to view it in a web browser.

Dear Madam, Sir,

I support what is being proposed for this ACP.

kind regards

[redacted]

[redacted]
Regulation Director

ARPAS-UK
www.arpas.uk
Twitter: @ARPASUK
LinkedIn: ARPAS-UK

Mon 13/04/2020 16:48

[Reply](#) [Reply All](#) [Forward](#) [...](#)

BAE Warton Response

RE: NATS FASI-N MTMA Manchester/ East Midlands Airspace Change Proposal



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

Reply Reply All Forward

Fri 03/04/2020 16:10

You replied to this message on 16/04/2020 13:36.

Good Afternoon and apologies for the delayed response due to restrictions on work access.

In the main, Warton agrees the 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'. In any case, we would be content if DP8 wording was modified as follows:

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

Regards



Birmingham Airport Response

RE: NATS FASI-N MTMA Manchester/ East Midlands Airspace Change Proposal



To: [Redacted] Airspace Consultation

Reply Reply All Forward

Fri 24/04/2020 10:11

Click here to download pictures. To help protect your privacy, Outlook prevented automatic download of some pictures in this message.

From: [Redacted]
Sent: 15 April 2020 18:22
To: Airspace Consultation <airspaceconsultation@nats.co.uk>
Subject: Re: NATS FASI-N MTMA Manchester/ East Midlands Airspace Change Proposal

Good evening,

Thank you for your email.

The Assessments Powerpoint slides state an Objective of:

Minimise impact of interactions between East Midlands, Manchester and neighbouring Airports i.e. Birmingham, Liverpool, Leeds etc.

The rest of the information explains the existing interface between Manchester and Liverpool Airports. What changes are proposed to the interface between East Midlands and Birmingham Airports?

Please add a Design Principle stating:

Any changes proposed by Manchester Airport or East Midlands Airport should not negatively impact traffic operating to or from Birmingham Airport (negatively meaning having an impact on capacity, increasing track-miles for aircraft operating, or increasing controller workload at Birmingham Airport). BAL requires to be fully consulted on any wider network changes that may be required to fulfil the Manchester and EMA ACP local arrangements.

Also, please add Birmingham Airport Limited (Kirstin McCarthy) to your distribution list in addition to myself in Birmingham ATC.

Best regards



From: Airspace Consultation <airspaceconsultation@nats.co.uk>
Sent: 22 April 2020 09:42
To: [Redacted] Airspace Consultation <airspaceconsultation@nats.co.uk>
Cc: [Redacted]
Subject: RE: NATS FASI-N MTMA Manchester/ East Midlands Airspace Change Proposal

Dear [Redacted]

Thank you very much for getting back to us. I have added Kirstin's email to our correspondence list for this ACP. Please find a response to your query below.

The rest of the information explains the existing interface between Manchester and Liverpool Airports. What changes are proposed to the interface between East Midlands and Birmingham Airports?

This ACP is specifically focussed on modifying the en route network (>7,000ft) to integrate with Manchester and East Midland's new designs, as part of their own ACPs. There is also a separate ACP focussed on the en route network above and surrounding Liverpool Airport, who are currently consulting on their proposed designs.

NATS has specifically mentioned other adjacent airports – such as Birmingham – as we are aware that modifying the en route network may also impact them. Similarly, we welcome their feedback as part of our upcoming Stage 2 Design Options work.

We have not started any of the design work so are not able to discuss any potential airspace/ procedure changes however, this ACP is not specifically focussed on the interface between East Midlands and Birmingham. The primary focus is for the en route network to interface with Manchester and East Midland's future changes but NATS will also be looking to improve the airspace where possible, such as reducing workload through systemisation. I hope that makes sense however, please let me know if you have any further questions.

Thank you also for your suggestion of the additional Design Principle which we will consider and will be included in our submission to the CAA.

Kind regards,



NATS

Airspace Change Specialist

Hi [Redacted]

Apologies for coming back to you again, but could I check my understanding on the additional Design Principle you've proposed below please?

Any changes proposed by Manchester Airport or East Midlands Airport should not negatively impact traffic operating to or from Birmingham Airport (negatively meaning having an impact on capacity, increasing track-miles for aircraft operating, or increasing controller workload at Birmingham Airport). BAL requires to be fully consulted on any wider network changes that may be required to fulfil the Manchester and EMA ACP local arrangements.

Your proposed Design Principle specifically mentions the lower level Manchester (portal) and East Midlands (portal) ACPs which NATS is not responsible for – our ACP encompasses the MTMA network changes which will be coordinated with the airports' proposals. Does your suggestion still apply to our NATS en-route ACP or were there any additional comments you wish to submit?

Kind regards,

Marietta

NATS

Airspace Change Specialist

From: [REDACTED]
Sent: 24 April 2020 09:46
To: Airspace Consultation <airspaceconsultation@nats.co.uk>; [REDACTED]
Subject: RE: NATS FASI-N MTMA Manchester/ East Midlands Airspace Change Proposal

Hi [REDACTED]

Apologies that is my mis-understanding.

Are you available on the number below and can we have a quick chat about it?

Best regards
[REDACTED]

From: [REDACTED]
Sent: 27 April 2020 16:20
To: [REDACTED]
Subject: NATS MTMA Manchester/ East Midlands ACP

Hi [REDACTED]


Hope you had a nice weekend.

Following on from our conversation last week, I've spoken to [REDACTED] - who worked on the "original" PLAS airspace change. James explained that the original design work involved changes which would impact Birmingham Airport, including the CHASE Hold (which you mentioned). However, these changes are not being progressed as part of the current MTMA East Mids/ Manchester ACP, specifically there will not be any changes to the CHASE Hold.


Birmingham Airport will continue to be engaged as you operate within the associated region of airspace and NATS are keen to make environmental improvements where possible.

As mentioned, the ATC team for this project are currently on furlough leave but please let me know if you have any further questions and I'll do my best to help.

Kind regards,
[REDACTED]



[REDACTED]
Airspace Change Specialist

 [REDACTED] To [REDACTED] Reply Reply All

[Click here to download pictures.](#) To help protect your privacy, Outlook prevented automatic download of some pictures in this message.

Hi [REDACTED]

Sorry for the slow response.

I am content with response below, it's really useful for us to know that there will be no changes to the CHASE hold.

No further feedback from us on the design principles.

Many thanks
[REDACTED]

From: [REDACTED]
Sent: 29 April 2020 16:07
To: [REDACTED]
Subject: RE: NATS MTMA Manchester/ East Midlands ACP



Hi [REDACTED]

As I'll submitting our final Design Principles to the CAA on Friday, I wanted to check if you're content with the below response and whether you had any final comments to make in regards to the draft Design Principles? I've attached your original response.

Kind regards,
[REDACTED]

British Helicopter Association (BHA) Response

RE: NATS FASI-N MTMA Manchester/ East Midlands Airspace Change Proposal

 [REDACTED] To  Airspace Consultation Reply Reply All Forward ...

[You replied to this message on 16/04/2020 14:41.](#) Thu 09/04/2020 16:07

The BHA has no comments

[REDACTED]
CEO

British Microlight Aircraft Association (BMAA) Response

Re: NATS FASI-N MTMA Manchester/ East Midlands Airspace Change Proposal



To: [Redacted] Airspace Consultation

Reply Reply All Forward

Wed 18/03/2020 11:50

You replied to this message on 16/04/2020 11:16.

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.

Please find attached our priorities during the CAP 1616 Design Principles Stage of an ACP.

[Redacted]
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.

British Skydiving Response

RE: NATS FASI-N MTMA Manchester/ East Midlands Airspace Change Proposal



To ○ Airspace Consultation

[↩ Reply](#) [↩ Reply All](#) [→ Forward](#) [⋮](#)

Thu 09/04/2020 17:00

[i](#) You replied to this message on 16/04/2020 14:42.

Dear [REDACTED]

I apologise for not replying, but I have no comments to made

Yours faithfully

[REDACTED]

City Airport & Heliport (Barton) Response

RE: FW: NATS FASI-N MTMA Manchester/ East Midlands Airspace Change Proposal



To: [Redacted] Airspace Consultation

Reply Reply All Forward ... Tue 14/04/2020 15:44

Follow up. Completed on 16 April 2020.
 You replied to this message on 16/04/2020 15:53.
 Click here to download pictures. To help protect your privacy, Outlook prevented automatic download of some pictures in this message.

Hi,

Please can you update your contact below to [Redacted] as this arrived at our generic mailbox which is why it might have been missed.

Please find below response for you.

Kind regards,

[Redacted]
 Airport Director
 City Airport and Manchester Heliport
 (Manchester Barton) City Airport Ltd, Liverpool Road, Manchester M30 7SA
 Telephone: [Redacted]
 Airport: www.cityairportandheliport.com
 Heliport: www.manchesterheliport.co.uk
 Runway 26 Café/Bar: www.runway26.co.uk
 Events: www.visitcityairport.co.uk



No	Design Principle	Category	Notes	Stakeholder Comments
1	The airspace will maintain or enhance current levels of Safety.	Safety		In relation to GA – without understanding details of changes, hard to ascertain.
2	The proposed airspace will maintain or enhance operational resilience of the ATC network	Operational		In relation to GA – if simplification and improvements can also reduce potential for Infringements, then yes this should improve resilience.
3	The proposed airspace design will yield the greatest capacity benefits from systemisation	Operational		No comment
4	The MTMA airspace design will provide a compatible and optimised interface between the Free Route Airspace (FRA) and ATS network.	Technical		No comment
5	The proposed MTMA airspace will facilitate optimised network economic performance.	Economic	this includes track mileage/ fuel-burn/ route charges	No comment
6	The proposed MTMA airspace will facilitate the reduction of CO ₂ emissions per flight	Environmental		No comment
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		No comment

No	Design Principle	Category	Notes	Stakeholder Comments
8	The MTMA airspace should be compatible with the requirements of the MoD.	Operational		No comment
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 – impacts on GA should be minimal or provide a positive benefit. In addition, ability for Instrument approach capability at City Airport (Barton) should be considered as this is a likely development in future and occasionally ad-hoc IFR departures already take place.
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	Agreed – impacts on GA should be minimal or provide a positive benefit by release of CAS. Additional height overhead City Airport (Barton) and within vicinity, possibly to 2500ft would be beneficial. In addition, ability for Instrument approach capability at City Airport (Barton) should be considered as this is a likely development in future and occasionally ad-hoc IFR departures already take place.
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.	No comment
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.	No comment
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.	No comment
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).	No comment

No	Design Principle	Category	Notes	Stakeholder Comments
	Add further suggested Design Principles HERE.			

easyJet Response

Re: NATS FASI-N MTMA Manchester/ East Midlands Airspace Change Proposal



 To  Airspace Consultation Fri 10/04/2020 09:31

↩ Reply ↶ Reply All ➔ Forward ⋮

📌 You replied to this message on 16/04/2020 14:49.
If there are problems with how this message is displayed, click here to view it in a web browser.

Approve.



Regards,


Flight Planning Manager
Integrated Control Centre (ICC)
call me: 

fly us: www.easyJet.com
holiday with us: www.easyjet.com/holidays
tweet us: www.twitter.com/easyJet
friend us: www.facebook.com/easyJet
follow us: www.instagram.com/easyJet


Guild of Air Traffic Control Officers (GATCO) Response

Re: NATS FASI-N MTMA Manchester/ East Midlands Airspace Change Proposal


 To  Airspace Consultation Thu 30/04/2020 15:57

↩ Reply ↶ Reply All ➔ Forward ⋮

📌 Follow up. Completed on 01 May 2020.

Hi 

Apologies for the lateness of our response.
Please contact me if you require any further information.
Best regards



V P Policy GATCO


No	Design Principle	Category	Notes	Stakeholder Comments
1	The airspace will maintain or enhance current levels of Safety.	Safety		GATCO would support the reasoning given by NATS and agree with the listed benefits. We would want to see more detailed designs before we could support fully, but there are certainly no objections at this stage.
2	The proposed airspace will maintain or enhance operational resilience of the ATC network	Operational		We would note that NATS have correctly assessed that the ACPs at Manchester, Liverpool and East Midlands airports are critical and the implementation of any of these ACPs need to be fully aligned with NATS ACP.


No	Design Principle	Category	Notes	Stakeholder Comments
3	The proposed airspace design will yield the greatest capacity benefits from systemisation	Operational		We would suggest that some of the more novel approach concepts (such as point merge) work well in environments with a lot of "space" without airports being too close together. The Manchester/Liverpool/East Midlands area would appear to be the opposite so any attempt to introduce point merge, without assessing the impact it would have on the rest of the traffic flows or without having a joined up plan to make changes to the other flows of traffic, could result in very little operational benefits and controllers having to make up for the shortcomings of the system.
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	We note also that given the current uncertainty surrounding the industry, 2022 may be optimistic. We suggest the airlines will want to see what the benefit is that they are paying NATS and the other ANSPs to produce are - and it's not inconceivable that a decision may be taken that it's not required just now.
6	The proposed MTMA airspace will facilitate the reduction of CO ₂ emissions per flight	Environmental		
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		
8	The MTMA airspace should be compatible with the requirements of the MoD.	Operational		No comments
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	

No	Design Principle	Category	Notes	Stakeholder Comments
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.	From the perspective of ATC controllers directly affected by this, we suggest the greatest benefit will be the systemisation of interactions between Manchester and Liverpool traffic. East Midlands is less of an issue but if you move the DAYNE hold south and make it into a point merge for traffic from the south and south west, the interaction of East Midlands traffic becomes more problematic.
13	Must accord with the CAA's published Airspace Modernisation Strategy (CAP1711) and any current or future plans associated with it.	Policy	<p>The CAA have stated that this DP is required by all change sponsors.</p> <p>CAP1711 describes what airspace modernisation must deliver including:</p> <ul style="list-style-type: none"> - the need to increase aviation capacity; - growth to be sustainable; - the need to maximise the utilisation of existing runway capacity. 	GATCO have seen from past experience that results from changes such as this have not been as beneficial operationally as first envisaged: for example at London City they have point merge but none of the changes around have taken place (especially Gatwick) which rendered that system a bit of a futile exercise. The system is safe, the controllers can use it but it has certainly increased the level of coordination between controllers in the TC ops room (workload) without delivering all the anticipated benefits. And increased workload for other controllers (e.g. Heathrow approach) as a result of that new airspace/system.
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).	
	Add further suggested Design Principles HERE.			We would also note that this is a major change for our members, so we'd expect comprehensive training for those affected and suggest that implementation needs to be deconflicted from any other changes, and completed during (usually) quieter traffic months (November to March).

The Honourable Company of Air Pilots (HCAP) Response



To:  Airspace Consultation

Cc: 

↩ Reply
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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,



--


 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 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		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
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 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.			

RE: NATS FASI-N MTMA Manchester/ East Midlands Airspace Change Proposal



To: [Redacted]
Cc: [Redacted]

Reply Reply All Forward

Fri 17/04/2020 07:09

You replied to this message on 22/04/2020 10:32.

Hello,



Mis communication my end.


No	Design Principle	Category	Notes	Stakeholder Comments
1	The airspace will maintain or enhance current levels of Safety.	Safety		
2	The proposed airspace will maintain or enhance operational resilience of the ATC network	Operational		Approve
3	The proposed airspace design will yield the greatest capacity benefits from systemisation	Operational		Approve
4	The MTMA airspace design will provide a compatible and optimised interface between the Free Route Airspace (FRA) and ATS network.	Technical		Approve
5	The proposed MTMA airspace will facilitate optimised network economic performance.	Economic	this includes track mileage/ fuel-burn/ route charges	Approve
6	The proposed MTMA airspace will facilitate the reduction of CO ₂ emissions per flight	Environmental		Approve
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		Approve
8	The MTMA airspace should be compatible with the requirements of the MoD.	Operational		Approve
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	Approve
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	Approve
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.	Approve
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.	Couldn't see a direct link between LAMP and the MTMA within this slide pack.


No	Design Principle	Category	Notes	Stakeholder Comments
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.	Approve
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).	Approve
	Add further suggested Design Principles HERE.			


Manchester Airport Response

RE: NATS FASI-N MTMA Manchester/ East Midlands Airspace Change Proposal

 To:  Airspace Consultation Fri 20/03/2020 12:41

 You replied to this message on 16/04/2020 11:37.

 We sent you safe versions of your files
Outlook item



 NERL Design Principles for MTMA- MAN Airport comments v1.pdf
97 KB


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


Good afternoon,

Please find attached MAN's response.

Many thanks,

 Senior Project Manager
Engineering Services Project Delivery | 



Manchester Airport Group, 3rd Floor, Olympic House, Manchester, M90 1QX
Tel:  www.magaairports.com

NERL Design Principles for MTMA

MAN Airport comments

No	Design Principle	Category	Notes	Stakeholder Comments
1	The airspace will maintain or enhance current levels of Safety.	Safety		Agreed. This links to MAN agreed DPs
2	The proposed airspace will maintain or enhance operational resilience of the ATC network	Operational		No comments
3	The proposed airspace design will yield the greatest capacity benefits from systemisation	Operational		As written, this is a statement rather than a DP, and only addresses the requirement for Capacity through the use of systemisation (ie it's a solution). Suggestions: <ul style="list-style-type: none"> 1. Suggest change the words to "The design of the airspace shall minimise the need for ATC tactical intervention" (in principle this is systemisation but is less prescriptive). 2. From a MAN perspective we'd like to see a broader DP that provides capacity through design and makes the best possible use of advanced ATM techniques, tools and procedures. Its partly covered by DP11 but again, that's prescriptive. 3. In addition there needs to be something that covers delay, ie the airspace shall be designed in such a way that is not a constraint to airport capacity/growth. Its partly addressed through the link to CAP1711 but when it comes to assessment of designs against DPs we'd like to see something more measurable so we can compare and contrast options.
4	The MTMA airspace design will provide a compatible and optimised interface between the Free Route Airspace (FRA) and ATS network.	Technical		It feels like there needs to be a bit of background to explain the words. What is "compatible and optimal" and what benefits will it bring? It

				would be good to have this design principle described in benefits rather than features. Also this only looks upwards into FRA. Can it be extended to cover the interface below the MTMA with airports...ie "a compatible and optimised interface with FRA and airports..."
5	The proposed MTMA airspace will facilitate optimised network economic performance.	Economic	This includes track mileage/ fuel-burn/ route charges	Again this is an outcome and isn't really transparent what it means. The DP should better describe what are the factors that will contribute to this performance (maybe add in the text from the notes).
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		This is linked to 14 and I'd suggest the two could be combined. The routes in the upper airspace should be designed in a way that can respond to the environmental requirements below 7000ft. This has been discussed at length in the development of the requirements between MAN and NERL and has resulted in requirements that cover the use of CDO and CCDs but also delay absorption such as point merge. We'd like to see something more specific to reflect this interaction and collaborative route design. 7000ft is just a boundary written by the regulator, and the need to manage environmental performance is one that falls on bot airports and NERL.
8	The MTMA airspace should be compatible with the requirements of the MoD.	Operational		Agreed in principle, but it should balance these with the needs of civilian air traffic. Perhaps it would be more appropriate to add "...and will seek to apply the use of Flexible Use of Airspace arrangements wherever possible". ?

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	Commercial airlines are "civilian users" so is this what is meant on this DP? Perhaps change to "The impacts on GA and other non-commercial airspace users"
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	Agreed, this matches with MAN DP "A"
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.	Can you be more specific about the "appropriate standard of PBN"? This links back to both capacity and delays; we see that any design to the lowest common denominator may not yield the overall benefits.
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;	Agreed but there's a lot of things under the umbrella of 1711. Some of these requirements around capacity and sustainability are already addressed elsewhere so I'm not sure if there's a conflict ? Is there also a link to the Airspace masterplan ?

			- 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).	Agreed although this could be combined with DP10
	Add further suggested Design Principles HERE.			

MoD Response

To: Airspace Consultation

You replied to this message on 16/04/2020 11:34.

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Thu 19/03/2020 09:07

Good Morning,

Thank for the information below; MOD Approve of the list in terms of content however we would seek clarity how or what priority will be afforded to the list of proposed DPs for this ACP, and for the series of other ACPs as highlighted below - grateful for confirmation.

Thanks,

Regards

| Sqn Ldr | SO2 Airspace Plans | Defence Airspace and Air Traffic Management | CAA Aviation House | Gatwick, RH6 0YR | Civilian Telephone:
 | MOD Net: DAATM-AirspacePlansSO2 | E-Mail: [REDACTED]

Responses received for the MTMA EGGP Design Principles – applied to this submission

Airlines UK Response

To Airspace Consultation

Cc [Redacted]

↩ Reply ↩ Reply All → Forward ⋮

Wed 26/02/2020 09:37

This message was sent with High importance.

NATS Airspace Change Team,

Please see comments in the table below.

All the very best

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
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

No	Design Principle	Category	Notes	Stakeholder Comments
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 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.	Agreed.
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 Balloon and Airship Club (BBAC) Response



To  Airspace Consultation

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Tue 17/03/2020 11:22



I cannot find an 'approve' button.

I approve.


[REDACTED] (BBAC)

British Hang Gliding and Paragliding Association (BHPA) Response



To  Airspace Consultation
Cc 

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


Dear 



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


BHPA Technical Officer


Tel: 
Email: 
Web: www.bhpa.co.uk


British Hang Gliding and Paragliding Association (BHPA)

[Reply](#) [Reply All](#) [Forward](#) [More](#)

Tue 10/03/2020 09:0

Denbigh Gliding Club Response



To  Airspace Consultation

[Reply](#) [Reply All](#) [Forward](#) [More](#)

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

Skydive Northwest Response



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]