

Design Principles Supplementary Document

1. **Introduction.** In accordance with the CAP 1616, the Change Sponsor has engaged with potential stakeholders to notify them of the proposed *design principles* to be employed in the creation of the design options for airspace changes at Holbeach. Local stakeholders engaged with included; local Harbour Masters, HM Coastguards, NATS, adjacent airports/RAF Stations, Environmental Agency, Natural England, members of the Military Airspace Users Working Group (MAUWG), Swanwick (mil), RSPB, EIFCA, and DIO Ecologist, Environmental Support & Compliance (20 stakeholder groups in total). Unfortunately, due to the vast list of stakeholders and their locations, it was not feasible to arrange a 'sit around the table' to discuss the Design Principles; however, all potential stakeholders were sent an email outlining the intentions – with an attached letter detailing the proposed design principles. The change sponsor endeavoured to follow-up with phone calls to each stakeholder to briefly explain the ACP process and answer any questions. Each contact was given 2-5 weeks to reply with any initial questions/comments.
2. **The Purpose.** The purpose of the initial engagement was to provide the Change Sponsor with stakeholder views and potentially highlight previously overlooked consequences of a particular design option prior to formal consultation.
3. **Development of Design Principles.** CAP 1616 guidance explains that it is important for the design principles to be drawn up through engagement between the Change Sponsor and affected stakeholders at this early stage in the process, and that unanimous agreement on the principles may be unlikely. Fortunately, all the feedback and discussions regarding the 7 proposed design principles was positive; resulting in an additional principle being raised by a stakeholder and accepted by the Change Sponsor. Many of the stakeholder sectors were content with the design principles, but were understandably more interested/concerned with the *later* ACP stages (ie proposed airspace design).
4. Each stakeholder was given the opportunity to: comment on the design principles, rank them, disagree/agree with them, and recommend any further design principles of their own.
5. The Change Sponsor received no suggestions for amending any of the proposed principles. Two of the stakeholders shared concerns over *environmental & ecological* issues, so the Change Sponsor has added that as an extra design principle (**principle 3** in the table below). With the majority of stakeholders awaiting the 'meatier' step of airspace design and consultation, only a few members ranked the principles (consisting of their 'top 3' principles). Despite little feedback received on 'ranking', the Change Sponsor has ranked the principles based on all ranking-responses; including the additional principle that was deemed important by 2 of the stakeholders.
5. **Outcome.** The comments/feedback from the stakeholders have been added to the table below (APPENDIX A). There have been no changes to the proposed principles and the comments received will be brought to the table for the subsequent ACP stages. Thanks to the open engagement, one addition has been made (principle 3). With most stakeholders waiting for the next stages (when they might have more input), the Change Sponsor believes sufficient engagement has taken place regarding the Design Principles, and will now liaise with the CAA.
6. The Change Sponsor made it clear to the stakeholders that they would remain a stakeholder throughout the ACP process, and that they will have further opportunity to comment at subsequent stages; including the consultation.

APPENDIX A - Design principles developed through stakeholder engagement

	Design principle	Priority	Group Agreement <i>(Unanimous = either all stakeholders have concurred, or, no comment/objection received)</i>	Group Comments <i>(other comments have been received, but not pertinent at this stage)</i>	Sponsor's Comments	Final Principle <i>(based on stakeholder input)</i>	Rationale <i>(by Change Sponsor)</i>
1	The design will provide a suitable safe training area.	USAFE 1	Unanimous	Swanwick – content. Environment Agency – content. Both Harbour Masters – content.	Safety Compliance is of paramount importance and therefore the overriding principle with any design option.	The design will provide a suitable safe training area.	Designs must maintain the required levels of flight safety.
2	Management of airspace to utilise FUA principles (Efficiency + Airspace Sharing).	NATS 1	Unanimous	Swanwick – content. Environment Agency – content. Both Harbour Masters – content.	FUA is key with any airspace design, and this will be factored in with the design.	Management of airspace to utilise FUA principles (Efficiency + Airspace Sharing).	FUA is a hot topic now with future airspace designs across Europe. This process will also consider FUA.
3	Consider Environmental & Ecological impact.	Raised by DIO and Natural England.	Unanimous	Holbeach AWR has several nature conservation designations being part of the Wash Special Area of Conservation, Special Protection Area, Ramsar Site, European Marine Site and Site of Special Scientific Interest. The area is	The Change Sponsor will maintain good liaison with the associated POCs, and the DIO POC for 'Ecologist, Environmental Support & Compliance' will kindly carry out the required Assessment.	Consider Environmental & Ecological impact.	These areas should be looked at to ensure that best practice is made – as well as local laws wrt environmental & ecological

				protected by several pieces of legislation.			changes adhered to.
4	Safety – ensure airspace design safely caters for all profile types.	USAFE 2	Unanimous	Swanwick – content. Environment Agency – content. Both Harbour Masters – content.	To maximise training, all Holbeach profiles should be contained with the new airspace design to ensure the air systems are safely protected.	Safety – ensure airspace design safely caters for all profile types.	The new design options should cater for modern & future training scenarios.
5	Minimise impact upon the network where possible (Efficiency + Airspace Sharing).	NATS 2	Unanimous	Swanwick – content. Environment Agency – content. Both Harbour Masters – content.	The new design should adhere to the CAA buffer policy rule and remain clear of other segregated airspace /controlled airspace.	Minimise impact upon the network where possible (Efficiency + Airspace Sharing).	Tied-in with safety principles, this ACP will consider the clear need to minimise impact upon the network where possible.
6	The training area will be within reach of UK/USAFE Main Operating Bases.	USAFE 3	Unanimous	Swanwick – content. Environment Agency – content. Both Harbour Masters – content.	To maximise ‘time on target’ (time spent at the range), the location of Holbeach is ideal for many units. Other ranges such as Pembrey Sands and Tain are too far away and therefore most of the sortie time would be spent getting to the site/requiring re-fuel.	The training area will be within reach of UK/USAFE Main Operating Bases.	The associated variables are physically fixed – the bases will not be moving, and the Holbeach re-design will be IVO Holbeach.

7	Minimise impact upon any other airspace users.	NATS 3	Unanimous	<p>Swanwick – content.</p> <p>Environment Agency – content.</p> <p>Both Harbour Masters – content.</p>	<p>This will be important to local airspace users, and is therefore to be considered throughout this process.</p> <p>The new radar pattern at RAF Marham has been raised – already close to the Wash/Holbeach; therefore, this principle is pertinent to ensure there is safe separation from adjacent airspace/units.</p>	Minimise impact upon any other airspace users.	As per Sponsor's comment.
8	Simplicity - utilise existing structures where possible (Efficiency, Simplicity + Safety).		Unanimous	<p>Swanwick – content.</p> <p>Environment Agency – content.</p> <p>Both Harbour Masters – content.</p>	<p>This ACP is only looking at the enhancement of airspace, so it is unlikely that any structures will change/be introduced. All current structures & safety SOPs will be in place/continue.</p>	Simplicity - utilise existing structures where possible (Efficiency, Simplicity + Safety).	The enhancement of airspace should not affect structures at Holbeach or surrounding areas.