

Engagement Log - ACP-2020-026 - Stage 1B

Stakeholder	Tel No	email address	Date of Engagement	Activity - Subject - Correspondents - Decisions - Actions
NATMAC List and MoD Contacts	N/A	[REDACTED]	08-Dec-21	Initial Email explaining ACP-2020-026 and requesting engagement of the design principles

Email Response Log - ACP-2020-026 - Stage 1B

Stakeholder	Organisation	email address	Date of Engagement	Stakeholder response	DP Related to
	British Microlight Aircraft Association		08-Jan-21	Generic List of Principles Provided	a
	DCTT 22 Gp		11-Jan-21	Nil Return	N/A
	A7 Enablers		11-Jan-21	Informing of PoC	N/A
	22 Gp (AOC PSO)		13-Jan-21	Points from 22 Gp Snr Op endorsed by AOC 22 Gp: Do you agree that these principles meet the SoN? Yes, with observations below.  Do you have any observations or concerns about the design principles? Yes.  Are there any omissions or additions you feel should be considered for inclusion? Yes.  Detail:  Mentions need to be accessible by USAFE and UK assets. Should this include FOBs? Some assets may need to forward deploy to co-locate with other blue assets, secure brief/debrief, or due to sheer numbers (80+ assets). Should mention need to employ from the Carrier and ensure design includes embarked Air support assets too – Crownest etc. Should Security considerations be included up-front (or are they discussed darkside?). Include need to have adequate CSAR capability to service LFE – will require civilian support. Include contracted services such as Cobham (now) and likely services in the future. It will affect basing and airspace requirements for civvy-operated assets.  Please provide any further comments, suggestions or considerations in relation to this airspace proposal that we should be aware of.  Will this study have to accommodate thoughts on LVC (will require reachback to a hub (Leeming)? Waddington)? LVC may reduce LFE assets, reduce security concerns, increase op realism, whilst reducing RTL (decreased density of traffic)	b & c
	RAF Cramwell, Woodvale, 3 FTS		14-Jan-21	Nil Return	N/A
	Tower Ops Manager, Edinburgh Airport		15-Jan-21	Could you clarify a couple of things please? Is there a base level for the proposed area? Does the area overlap Edinburgh CTA/Scottish TMA? In the letter it appears to do so, but when I looked on the ACP website and zoomed in, it looked like it may be adjacent. The letters talks of the area being "activated intermittently" – in concept, can you give an indication of how often this would be? Weekly, monthly, bi-monthly etc?  Response provided then subsequent response from Tony was: Thanks for clarifying. That's a big help for our engagement with Edinburgh Airport Ltd and obviously our own response.	N/A
	Director of Operations, Newcastle Airport		18-Jan-21	I have a number of concerns which include amongst others: The lack of time Newcastle Airport is being given to respond. Responding mid Covid-19 pandemic, with staff furloughed, whilst managing an existential crisis for the airport is unhelpful. Four weeks is insufficient time to fully understand the impact and seek external advice. The potential strategic consequence of this proposal upon Newcastle Airport. Lack of fidelity in the enclosed Fig 1 graphic – it appears Newcastle Airport is directly underneath the proposed area. Proposed design for "supersonic flight and rapid height changes" – a potentially serious impact on commercial flights. As it stands Newcastle Airport objects to the proposal. I wish to request an extension to the response times, to better understand the potential impact.	N/A
	USAFE - Host Nation Co-ord Cell		44221	Nil Return - new POCs passed	b & e
	RLO - British Ballon and Airship Club		27-Jan-21	Do you agree that these principles meet the SoN – YES Do you have any observations or concerns about the design principles – NO Are there any omissions or additions – NO Comments: As the BBAC representative on the NATMAC Committee I feel that the proposed changes will have a minimal effect on the ballooning community covered by the area of this ACP.	N/A
	HQ 6 FTS		27-Jan-21	1. It is anticipated that this will have little or no impact on 6 FTS Tutor operations. 2. Only operations from Leuchars Station and RAF Leeming are likely to be affected in any way but this is expected to be nothing unusual when compared to that from other large-scale exercises. 3. We anticipate that any such activity will be promulgated in good time and subject to NOTAM action in the usual manner.	N/A
	Director of Operations, Newcastle Airport		04-Feb-21	Letter to CAA attached.	All
	D SATCO Warton Aerodrome		08-Feb-21	We agree that these principles meet the SoN. We have no concerns at this stage regarding the design principles. However, we would be interested to understand whether the activation of the proposed airspace for exercise purposes would result in additional military air systems, perhaps prevented from using the D323 and D613 complexes during exercises, migrating over to Irish Sea airspace traditionally used by BAE Systems for test and development up to FL500+. In response to the question regarding any omissions or additions to be considered for inclusion, we note that military area ATC service provision during 2019 and 2020 (notwithstanding COVID 19) has often been sporadic. Indeed, BAE Systems has often been called upon to provide services to military aircraft to cover the shortfall and to ensure the military task may continue unhindered. In establishing this additional airspace, has service provision been considered?  With respect to any further comments, suggestions or considerations in relation to this airspace proposal, we would be interested to understand how the proposed airspace structure will be integrated into the Free Route Airspace construct due for implementation in December 2021 (subsequent phases to follow) and whether Irish Sea airspace will be affected by re-routed GAT flights profiles impacted by activation of the new airspace.	e
	GM Edinburgh Airport		11-Feb-21	Attachement to email - Tab 3	e & f
	Edinburgh Airport Noise Advisory Board		11-Feb-21	3 x Attachments to email	e & f
	Edinburgh Airport, Head of Airspace		11-Feb-21	2 x Attachments to email	e & f
	1 Gp Performance Manager		12-Feb-21	1. Do you agree that these principles meet the SoN? SoN primarily designed around facilitating the CA need which focuses on the majority of the 1Gp assets. It is expected that it will also have an indirectly but positive effect on the ISTAR Force as the Exercise scenarios should be better facilitated. 2. Do you have any observations or concerns about the design principles? Yes: a. Detail: RJ required to AAR following take-off prior to onward transit for missions. New airspace will cover AARAS (backup AARA when weather is bad in AARA 8). RJ cannot routinely use AARAS 7 as they are within D323 which is often active around RJ AAR timings. AARAs further north (AARA 2,3,4) would add to transit time and decrease time on task. In following phases of the airspace development, engagement will be required with RJ to ensure that AAR can still be gained expeditiously, and that routing through / over the airspace allows for practical onward transit. 3. Are there any omissions or additions you feel should be considered for inclusion? a. No 4. Please provide any further comments, suggestions or considerations in relation to this airspace proposal that we should be aware of. a. Nil Response provided, response from [redacted] as follows: If supporting the Ex then no issues as yes they will access the tanker tow lines. Their concern below was mainly a concern to their back-up / weather plan if they were not Ex participants but had a sortie at the same time the FCA was active (I know a slim and unlikely chance owing to how often this airspace will be utilised).  Ref TACTOW – it will be possible but with EAMTA, FCA and associated revised civil routes combined with the proximity to CAS / airways on the East Coast – finding suitable space to conduct a TACTOW may not always be straight forward.  I think RJ STANEVAL would just like to be brought in to the discussion at the next stage to run through the concerns / scenarios.	
	NATS			As part of our observations, NATS offers comment and suggestions in the table below and suggests some additional DPs at items 7-11. We believe it is also crucial that the output of MOD ACP-2020-046 (the Trial which supports this development) is a key consideration for this ACP, especially in relation to the wider ATM user community, environmental and network impacts. This includes network connectivity for affected airports in the vicinity and traffic flows.  That said, we acknowledge that you have captured elements of this in your proposed DPs so some of our suggestions relate to where we believe that some refinement of the wording would provide clarity and establish 'principles' of design rather than requirements.  Additionally, it might be useful to set out your priorities for your DPs.  We look forward to further engagement during your ACP development. In the meantime if you need clarity on any of the feedback provided or want to discuss anything further then please don't hesitate to get in touch.	d
					All

MOD Design Principles		NATS proposals and feedback
1	The airspace design must be safe, with any hazards identified and risks mitigated such that they are as low as reasonably practicable and tolerable.	NATS agrees that safety should be the number one priority
2	The training area will be within efficient reach of RAF / United States Air Force (Europe) (USAFE) Main Operating Bases.	This principle is loosely defined. What is the baseline for meeting this principle? How does the MOD define efficient in relation to this principle?
3	<p>The design will provide a suitable training area to meet the following core requirements:</p> <p>Full tactical employment of aircraft and weapon capability Supersonic flight and rapid height changes Use of high and low altitude activity concurrently Representative employment ranges of simulated air-air and air-surface weapons Representative formation numbers with opposing forces (&gt;80 aircraft) The design will provide a sufficient overland portion for running tactical scenarios, siting targets and simulated threats that facilitate representative collective training in a contested electromagnetic environment.</p>	<p>These are requirements/objectives and it is not clear how they support the need for new airspace. It could be reasoned that they are met by current airspace design.</p> <p>NATS believes clarity could be provided by replacing with the proposed principle at item 7.</p>
4	Safe, efficient and standardised management, notification and activation of airspace, utilising Flexible Use of Airspace (FUA) principles	<p>Suggest reword to present as a DP:</p> <p><b>Optimise Airspace Management (ASM) applying Flexible Use of Airspace (FUA) principles and ASM Policy</b></p>
5	Minimise impact on other airspace users and the network where possible.	Remove 'where possible'. NATS believes it should be possible. By saying "where possible" it implies that you don't think it is achievable before you start.
6	Minimise noise and environmental impacts, where relevant.	<p>NATS believes this principle should be split and proposes the following;</p> <p><b>Minimise environmental impacts including noise (where relevant)</b> <b>Minimise environmental impacts including and CO2 emissions</b></p>
7	<b>Optimise the airspace design to accommodate periodic Large Force Employment Operations</b>	
8	<b>Maximise the incorporation of results of the MOD's supporting Airspace trial – ACP-2020-042</b>	
9	<b>Optimise protocols for deconfliction of simultaneous activations of multiple volumes of Special Use Airspace</b>	
10	<b>Minimise complexity in flight planning</b>	
11	<b>Minimise the impact to Commercial Air Traffic flow, sector complexity and sector capacity.</b>	

4 February 2021

92 Squadron  
HQ Air & Space Warfare Centre  
RAF Waddington

Dear [REDACTED]

Response on behalf of Newcastle International Airport to ACP-2020-026 Future  
Combat Airspace for Military Collective Training – Step 1B Design Principles

Thank you for contacting Newcastle International Airport (NIA) and inviting comment in respect of the Design Principles – Step 1B of the CAP 1616 Airspace Change Proposal (ACP) process. The CAA states that the "design principles encompass the safety, environmental and operational criteria and the strategic policy objectives that the change sponsor seeks to achieve in developing the airspace change proposal". It also states: "An important part of Step 1B is for the design principles to be drawn up through discussion between the change sponsor and affected stakeholders at this early stage in the process."

NIA has been regularly engaged with the Ministry of Defence (MOD) during the planning and activation of the Trial Airspace [ACP-2020-042] that is associated with this ACP, but this is our first engagement with the permanent ACP process. Whilst this response is in respect of the permanent ACP, we understand that data gathered during the two separate phases of the trial may influence this ACP in the future. We would suggest that the use of this data, as it was collected in a period when movements were c5-10% of normal, will skew conclusions drawn and that the process should be mindful of the extraordinary circumstances in which it was gathered.

NIA understands the requirements of the MOD, and the Royal Air Force (RAF) in particular, to practise specific aspects of flying in multi-national packages, whilst employing high-energy manoeuvres and simulated weapon delivery tactics. These activities clearly require separation from all other aviation activity including Commercial Air Transport (CAT) and recreational flying, to be conducted safely. However, the segregation of large volumes of airspace, which is a finite resource in the UK, has second and third order consequences on those other activities, often with a financial or an environmental burden. In the case of NIA, any additional financial burden will be in addition to the unprecedented impact that COVID-19 has had for a period of time fast approaching 12 months, with no clear plan for recovery emerging.

The MOD has chosen to distribute its Design Principles (DPs) to stakeholders to invite comment, hence the purpose of this response. Whilst it is undoubtedly intentional that the DPs are high level, NIA is concerned about the priority each has within the ACP moving

Newcastle International Airport Ltd

[REDACTED]

forward. These DPs will underpin the design options for the airspace, and NIA seeks reassurance that the key drivers are not simply to satisfy the requirements of the MOD. In order of importance, we suggest the DPs should be prioritised as listed below:

1. The airspace design must be safe, with any hazards identified and risks mitigated such that they are as low as reasonably practicable and tolerable.
2. Minimise impact on other airspace users and the network, where possible.
3. Minimise noise and environmental impacts, where relevant.
4. Safe, efficient and standardised management, notification and activation of airspace, utilising Flexible Use of Airspace (FUA) principles.
5. The training area will be within efficient reach of RAF / United States Air Force (Europe) (USAFE) Main Operating Bases.
6. The design will provide a suitable training area to meet the following core requirements:
  - a. Full tactical employment of aircraft and weapon capability.
  - b. Supersonic flight and rapid height changes.
  - c. Use of high and low altitude actively concurrently.
  - d. Representative employment ranges of simulated air-air and air-surface weapons.
  - e. Representative formation numbers with opposing forces (>80 aircraft).
7. The design will provide a sufficient overland portion for running tactical scenarios, siting targets and simulated threats that facilitate representative collective training in a contested electromagnetic environment.

In terms of the first DP, we agree that safety is paramount. We would expect NIA to be involved in Focus Groups at Stage 2, (Develop Design Options) stage and would wish to be invited to any Hazard Identification Workshops proposed by the MOD. NIA has concerns about how large numbers of fast jets operating at the extremes of their envelope, some of which may be air forces from other states and therefore potentially unfamiliar with UK procedures, will be handled. We would presume that Swanwick Military would retain control of aircraft, although some may be under the control of RAF Boulmer or other Air Defence controllers. An understanding of any potential military and displaced air activity outside of the proposed ACP needs to also be considered as part of Stage 2.

The second DP listed recognises the significant impact any new airspace restriction is likely to have on established flight profiles. Therefore, the use of the words 'where possible' indicates that this is not as high a priority for the MOD. We consider that the DP listed above as No 4 is a sub-set of DP No 2. The principle of employing FUA is one mechanism that should facilitate the minimal impact to other aviation users. FUA should ensure that suitable notification of activation takes place, allowing flight crews to plan to avoid the airspace and have sufficient fuel loads to route around it. Recognising that the airspace will not be permanently active, NIA seeks clarification on the cadence of activation proposed, and the duration that the airspace will be activated.

The Assessment Meeting Presentation published on the CAA ACP Portal suggests that the airspace will be required: "As required to meet collective training requirements. Currently forecast to be 2 periods of ~ 18 activations per year. Duration is ~3 hours". NIA would like to understand if this is a maximum number of activations permitted. Does this figure include an allowance for scrub days due to poor weather etc? The presentation also indicates a likely activation period of between 0930 – 1230 (L). We would like to understand if the exercises are likely to be planned all year round, or if they could perhaps be limited to November to March (IATA winter period) on the basis that winter schedules will potentially

Newcastle International Airport Ltd

[REDACTED]

have a lower impact than during the summer schedule. We request that this DP is re-drafted to remove the words "where possible".

DP 3 concerns the intention to minimise noise and environmental impacts. As a military ACP, we understand that it will not be necessary to assess the impact of aircraft operating within the new airspace, but the potential environmental and noise impacts caused by the re-routing of CAT and other aviation will need to be assessed. This is considered to be a higher priority for NIA than the core military requirements. NIA is concerned that any increase in fast jet activity within the vicinity of the Airport may be considered by some stakeholders to be associated with NIA activity. NIA seeks assurance that full engagement with non-aviation stakeholders will make this clear during Stage 2, and Stage 3.

DPs 5, 6 and 7 relate directly to core military requirements and will inform the location and volume of airspace required; clarity on live or simulated weapon capability would be welcomed. DP 7 refers to electromagnetic environments, and we would like to understand if this refers to the EWTR at RAF Spadeadam and whether the airspace solution would include the geographic dimensions of the EWTR, or if this would be utilised in addition to the Future Combat Airspace. We would also like to understand if the cumulative impact of having the EWTR at RAF Spadeadam concurrently active with any newly proposed airspace, associated with this ACP will be considered during the design option stage.

We expect the comments raised above to form the basis of our engagement with the MOD during Stage 2. NIA wishes to formally record that after Safety, NIA's main concern is to ensure that any potential changes to the airspace will have a minimal impact on NIA operations.

My staff remain ready to continue the engagement with the MOD throughout the development of the design principles at Step 1B, and in the development of the Design Options during Stage 2.

Yours sincerely

[REDACTED]

DIRECTOR OF OPERATIONS

Newcastle International Airport Ltd

[REDACTED]



## 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

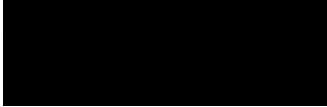
1. Sponsors must show how they are integrating their proposal within the overall UK airspace modernisation context, for example proposals which do not connect efficiently between upper and lower airspace (potentially under different airspace "management") would only inhibit overall airspace efficiency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



Control Tower Building  
Edinburgh Airport



Officer Commanding 92 Squadron  
Air and Space warfare Centre



11<sup>th</sup> February 2021

**Future Combat Airspace – Airspace Change Proposal ACP-2020-026  
Stage 1B Engagement**

Dear Sir,

Thank you for your letter dated 07 Jan 2021 with reference to an Airspace Change Proposal for the establishment of new, suitable and safe airspace to facilitate large scale exercises that will allow modern military aircraft to train to their full capabilities.

We would like to express concern at some of the proposals raised that may affect our operation at Edinburgh Airport and ask for clarification on these points.

The Statement of Need does not detail the type of airspace required or indeed how often the area will be used. The potential area identified also seems to cover a large part of the North Sea so will affect any aircraft inbound to Edinburgh from the east and indeed outbound using similar routes. We require a more detailed map to be produced of the proposed piece of airspace to inform an Airspace Change that is currently underway at Edinburgh Airport where we are one of the major stakeholders. Also, could you provide evidence why the new piece of airspace that you describe needs to be in the proposed location and why existing airspace such as D323 or D701 cannot be used.

We support the design principle of "Safe, efficient and standardised management, notification and activation of airspace, utilising Flexible Use of Airspace (FUA) principles" and will have to look at how that will affect the service we provide to Airlines as Edinburgh's ANSP.

You state that "The impact on other airspace users and the network will be minimised where possible". Of course, relocating the airspace would negate the need to minimise the impact on Edinburgh's traffic and the phrase "where possible" seems vague. This reads as though you could, in effect, do as you please (although I am sure this is not the case) so we would suggest the simplified design principle of "Minimise impact on other airspace users and the network" as the words "where possible" are not required and this new wording suggests a definite

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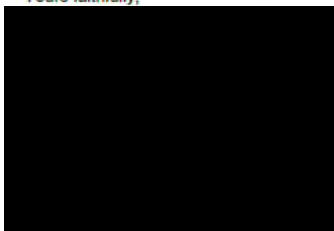
commitment.

The design principle of "Minimise noise and environmental impacts, where relevant" are issues that are always relevant to our operation but if your proposal is to fly above 7000ft then I would suggest the relevance is reduced through national guidance. Again though, we would suggest omitting the words "Where relevant" from this design principle.

We are currently engaged as a stakeholder in an Airspace Change proposal at Edinburgh for the establishment of PRNAV SIDs, Approach transitions and Approaches and look forward to working with the MoD along with Edinburgh Airport and NATS to provide the best solution that allows the airport to thrive commercially which will of course assist us in providing the best service possible as the ANSP at Edinburgh. This airspace change will include improvements to flight paths to the east of Edinburgh so we seek reassurance that the establishment of this airspace will be infrequent and the activation of this airspace will be coordinated with NATS so that any new flight paths that we establish will be used for maximum benefit to other airspace users during times of deactivation.

Thank you for your correspondence and we look forward to working with you and our other stakeholders to provide the best solution for all concerned.

Yours faithfully,



## £ANAB response to Future Combat Airspace ACP-2020-026

ACP-2020-026 is an Airspace Change Proposal submitted by the MoD to enable military exercises involving multiple assets from a combination of national forces. Although only at Stage 1b of CAP1616, and before the Design Principles have been agreed, the sponsor seems to have effectively chosen their preferred solution.

This Proposal needs to be challenged for two reasons. Firstly, because, as it stands, the area of airspace currently being promoted affects all of Edinburgh Airport's commercial traffic (both arrivals and departures) routing across the North Sea between Hull and Dundee. Secondly, because the sponsor seems to have jumped to Stage 3 with their one preferred option and not carried out Stage 2 in which all possible options should be evaluated against the Design Principles.

There is a lot of clarification needed and a number of issues require explanation. For instance, how often will the airspace that is finally chosen be used, what is its classification and how will this be illustrated on aviation charts.

### Design Principles

In the hope that CAP1616 will be followed correctly, £ANAB offers, where appropriate, the following comments on the proposed Design Principles.

The key principles and requirements for the Future Combat Airspace are:

- The airspace design must be safe, with any hazards identified and risks mitigated such that they are as low as reasonably practicable and tolerable.

- The training area will be within efficient reach of RAF / United States Air Force (Europe) (USAFE) Main Operating Bases.

The design will provide a suitable training area to meet the following core requirements:

- Full tactical employment if aircraft and weapon capability

- Supersonic flight and rapid height changes

- Use of high and low altitude activity concurrently

- Representative employment ranges of simulated air-air and air-surface weapons

- Representative formation numbers with opposing forces (>80 aircraft)

- The design will provide a sufficient overland portion for running tactical scenarios, siting targets and simulated threats that facilitate representative collective training in a contested electromagnetic environment.

- Safe, efficient and standardised management, notification and activation of airspace, utilising Flexible Use of Airspace (FUA) principles.

£ANAB have no comments on the above Design Principles

- Minimise impact on other airspace users and the network, where possible.

- "where possible" is too vague. The phrase should be omitted.
- Clarify how often and for how long the training area will be in use annually
- Ensure that planned use is announced and discussed in time to minimise civil flight disruption.
- Include plans for direct route planning in the operating procedure.

- Minimise noise and environmental impacts, where relevant.

- Omit the phrase "where relevant"

## £ANAB RESPONSE

### Annex A to Future Combat Airspace – Airspace Change Proposal Stage 1B Engagement ACP-2020-026 Airspace Design Principle Engagement Response

Please complete the following short questionnaire providing feedback on the proposed design principles for ACP-2020-026.

Do you agree that these principles meet the SoN?

No

Do you have any observations or concerns about the design principles?

Yes

Are there any omissions or additions you feel should be considered for inclusion?

Yes

Detail:

We feel the last two Design principles need to be more definitive

A. "• Minimise impact on other airspace users and the network, where possible."

- "where possible" is too indeterminate. The phrase should simply be omitted.
- The ACP should clarify how often and for how long the training area will be in use annually. It should not be left open ended.

B. "• Minimise noise and environmental impacts, where relevant. "

- As with the previous comment, the phrase "where relevant" should be omitted.

Please provide any further comments, suggestions or considerations in relation to this airspace proposal that we should be aware of.

Detail:

In the MoD email of 7 January 2021, titled "Future Combat Airspace – Airspace Change Proposal Stage 1B Engagement", a Potential Area of Interest is indicated in Fig. 1. During Stage 2 of CAP1616 we would wish to see other areas being considered as well. For example, one possibility might be to move the whole area approximately 50 miles southwards which would avoid many of the negative impacts on flights to/from Edinburgh and Glasgow airports.

If the above-noted suggested relocation of the Area of Interest is not deemed to meet the Design principles sufficiently well, then two changes, in particular, would be really helpful.

- create a wider air corridor at the end of the Firth of Forth and make it safe for civilian aircraft 24/7, so that much of the traffic to/from Europe could be routed along the centre of the Forth direct to Edinburgh Airport;
- extend to 24/7 the operating hours of the existing part time route P18 from Newcastle to Aberdeen. From Edinburgh's perspective this would allow planes to

Scandinavia and beyond to use the Forth and thereby reduce the number of planes going overland near Edinburgh to link with route P600.

£DINBURGH AIRPORT NOISE ADVISORY BOARD (£ANAB)

11 February 2021

Letter to CAA

Dear Sir/Madam

### Future Combat Airspace – Airspace Change Proposal ACP-2020-026

The Edinburgh Airport Noise Advisory Board, (£ANAB), understands that this ACP is at Stage 1b, drawing up the Design Principles. While the proposed change is not of direct relevance to £ANAB, the potential knock on consequences, where flights from Edinburgh Airport have to be re-routed and fly over communities on the ground, clearly are.

We accept that the MoD have a need for an area where large scale training can take place. The CAP1616 process, under which this ACP is being promulgated, is a means by which various options as to how this need can be met can be assessed and the best outcome arrived at. The Design Principles should provide the criteria by which possible solutions are evaluated and assessed.

However, it seems to us that the sponsor has already decided which is their preferred solution and is inviting stakeholders to comment on that solution alone. It is as if stakeholders are being asked "Here is the solution, please come up with design principles that fit it", when our understanding is that it should be the other way round. This would seem to make the rest of the CAP1616 process somewhat redundant.

£ANAB has been considering the Design Principles for this ACP and has some comments which are given in the attached document. In particular, we are concerned that there are a significant number of occasions where rather indeterminate statements are made, particularly with reference to how often this airspace will be required. We strongly feel that there should be a definite maximum number of days per year that this airspace change can be invoked and a definite number of hours on each of those days. Because of the way the sponsor has presented this ACP, it is not clear if this is an issue to raise now or during the later consultation stage.

£ANAB accepts that ACP-2020-026 will reserve a large area of airspace for MoD use for a defined (but still unknown) number of days per year. This will give rise to the need for diversion and extra fuel burn by civilian aircraft on these days. In recognition of this, £ANAB anticipates that the MoD will be open to consideration of small permanent changes to their airspace boundaries near the mouth of the Forth which will facilitate fuel saving and reduced community noise impact for the bulk of the year. The desirable changes are described in our Annex A response enclosed. This would compensate for the disruption and additional fuel burn made necessary by ACP-2020-026 implementation.

Please note we are also copying this letter to the CAA, EAL and ICCAN for their information.

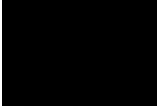
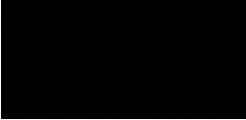
With best wishes,

On behalf of £ANAB

Cc – CAA, EAL, ICCAN



Officer Commanding 92 Squadron  
Air and Space warfare Centre



8<sup>th</sup> February 2021

**Future Combat Airspace – Airspace Change Proposal ACP-2020-026**

**Stage 1B Engagement**

Dear Sir,

Thank you for your letter dated 07 Jan 2021 with reference to Stage 1B engagement of ACP-2020-026.

We would like to express concern at some of the proposals raised that may affect our operation at Edinburgh Airport and ask for clarification on these points.

The Statement of Need does not detail the type of airspace required or indeed how often the area will be used. The potential area identified also seems to cover a large part of the North Sea so will affect any aircraft inbound to Edinburgh from the east and indeed outbound using similar routes. We require a more detailed map to be produced of the proposed piece of airspace to inform an Airspace Change that is currently underway at Edinburgh Airport where we are the sponsor. Also, could you provide evidence why the new piece of airspace that you describe needs to be in the proposed location and why existing airspace such as D323 or D701 cannot be used. This seems to anticipate the Options Appraisal stage of CAP1616 Stage 2, being the only option that is currently presented.

We support the design principle of "Safe, efficient and standardised management, notification and activation of airspace, utilising Flexible Use of Airspace (FUA) principles" and will have to look at how we can use this to our advantage working with NATS, ANS (our ANSP) and the airlines that we facilitate.

You state that "The impact on other airspace users and the network will be minimised where possible". Of course, relocating the airspace would negate the need to minimise the impact on Edinburgh's traffic and the phrase "where possible" seems vague. This

reads as though you could, in effect, do as you please (although I am sure this is not the case) so we would suggest the simplified design principle of "Minimise impact on other airspace users and the network" as the words "where possible" are not required and this new wording suggests a definite commitment.

The design principle of "Minimise noise and environmental impacts, where relevant" are issues that are always relevant to our operation but if your proposal is to fly above 7000ft then I would suggest the relevance is reduced through national guidance. Again though, we would suggest omitting the words "Where relevant" from this design principle.

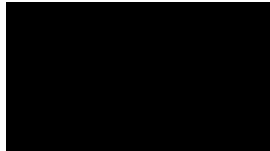
We are currently engaged as the sponsor for an Airspace Change Proposal at Edinburgh looking to establish PRNAV SIDs, Approach transitions and Approaches and look forward to working with the MoD along with ANS (Edinburgh's ANSP) and NATS to provide the best solution that allows the airport to thrive commercially which will of course assist us in providing the best service possible as the ANSP at Edinburgh. This airspace change will include improvements to flight paths to the east of Edinburgh so we seek reassurance that the establishment of this airspace will be infrequent and the activation of this airspace will be coordinated with NATS so that any new flight paths that we establish will be used for maximum benefit to other airspace users during times of deactivation. Glasgow Airport are also involved to a lesser extent in our ACP and we liaise with them and NATS to provide the best network solutions to any ACP's that affect our project as detailed in CAP1616.

Thank you for your correspondence and we look forward to working with you and our other stakeholders to provide the best solution for all concerned.

Yours sincerely,



Head of Airspace



**Annex A to Future Combat Airspace – Airspace Change Proposal Stage 1B Engagement**

**ACP-2020-026 Airspace Design Principle Engagement Response**

**Please complete the following short questionnaire providing feedback on the proposed design principles for ACP-2020-026.**

**Do you agree that these principles meet the SoN?**

No

**Do you have any observations or concerns about the design principles?**

Yes

**Are there any omissions or additions you feel should be considered for inclusion?**

Yes

**Detail**

The design principles include a statement for providing a suitable training area to meet the core requirements which are then listed. It must also be within efficient reach of assets and the illustrated area seems to imply that the best location for this airspace has been chosen already. Will the process detail why existing danger areas cannot be used?

For example, D323 or D701?

Also, there is no detail on how often the danger area will be active and the impact other active danger areas may have on the network when active at the same time. If the additional airspace is needed, then design principles should include this information as it may have an effect on other ACP's including Edinburgh's (ACP-2019-32). Knowing the airspace will be of limited use will help to inform other airspace users in designing solutions to mitigate against its' activity.

The design principle of "Minimise impact on other airspace users and the network, where possible" is open to interpretation and we believe that the words "Where possible" should be omitted.

Also, the design principle of "Minimise noise and environmental impacts, where relevant" again is open to interpretation so the words "where relevant" should be omitted as noise and environmental are always relevant. The issues may not be applicable above certain altitudes, but this needs to be mentioned.

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**Please provide any further comments, suggestions or considerations in relation to this airspace proposal that we should be aware of.**

**Detail**

Edinburgh Airport has commenced an Airspace Change Proposal (ACP-2019-032) which is currently paused, however, we have identified that a solution to our flights operating across the North Sea would be to establish flight paths that route along the Firth of Forth and so minimise noise impacts to local residents. These flightpaths would also reduce track miles flown for some routes and as such would be an appropriate solution for future operations at the airport.

We would look to work with the MoD along with NATS and Glasgow airport (as well as other airspace users) to provide the best solution for these easterly flight paths utilising Flexible Use of Airspace (FUA) methods as you state in your design principles.

We hope to remobilise our ACP soon and look forward to working with you in future months.



Head of Airspace

