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7th April 2021

Wing Commander Lewis Cunningham
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Dear Wing Commander Cunningham,

Thank you for contacting Newcastle International Airport (NIA) and inviting comment in respect of ACP-2020-042 and ACP-2021-007. NIA has been regularly engaged with the MOD during the planning and activation of the Trial Airspace and as part of the full ACP.

As per your request, feedback in relation to 'TDA597 activation' in March 2021 can be found at Annex B. In relation to your second request, feedback on 'ACP-2021-007 TDA 597 future activations', can be found at Annex C. For completeness I have provided at Annex A operational feedback communicated to the MOD as part of the initial trials.

Whilst we have provided this feedback in the best way we can in the prevailing circumstance; NIA has significant concerns with regards to the validity of any safety data gathered during the trial due to the unrepresentative operating environment. There has been an enormous temporary reduction in both commercial and general air traffic movements during the period of the trial, due to the Covid-19 pandemic.

For context, despite the industry starting to recover in March 2021, NIA air traffic movements were still 83% lower than they were during March 2019. NIA is also a notified Lower Airspace Radar Service (LARS) unit and we have experienced a 51% reduction in services provided to aircraft during the same period.

Whilst, there have been no significant safety issues raised as a result of TDA597; there have been a number of observations that under normal operating levels could have created issues.

It is also of concern that during March; Swanwick Military refused to work NIA traffic routing to the South East (ERKIT). This was despite previous assurances from the MOD that Swanwick Military would maintain service provision throughout the trial period and in accordance with the Pennine Radar task.

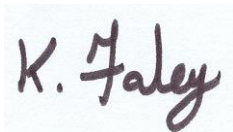
We are concerned that once normal levels of operation are restored flight safety will be compromised; this could potentially be mitigated through additional air traffic control resources at additional cost. Given this is a MoD requirement, we would seek some early assurance of financial compensation to Newcastle International Airport to ensure safe operations.

We also have significant concerns regarding the elongated routing that may be required on occasion by our commercial airline traffic, were this change to be approved. We believe the additional fuel burn and costs incurred are likely to make aeronautical connectivity less viable for the North East of England and thereby inhibit regional economic growth. We should also point out that this would also lead to increased environmental impact and therefore directly conflict with the UK's aspirations to lead the way on climate change and for the aviation industry to be at the forefront of this agenda.

Finally, just to reiterate that it is our considered view that the true impact of the trials associated with TDA597 and ACP-2020-026 cannot be meaningfully evaluated in the current operating environment.

In view of this and whilst our other concerns will in any event remain; we are firmly of the view that in order to proceed, it would be necessary to conduct further trials to harvest supporting data to fully assess the impact of the proposal once air traffic has significantly recovered in order to assess overall airspace safety should you wish to proceed with this proposal.

Yours sincerely,



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Annex A - Future Combat Airspace Trial Engagement – Previous EGNT Operational Feedback

Date Raised	Query	Requirement/Observation
28/07/20	Safety	Insufficient time to fully understand or assess the safety impact of the trial.
28/07/20	Operational Impacts	<p>The proposed size and scale of the new DA will significantly impact EGNT operations. In particular the inclusion of a Danger Area to the north of NATEB starting at FL85. Impacts envisaged are on commercial traffic inbound/outbound to EGNT and EGNV from the North. Additionally any aircraft looking to transit via NATEB North/South. The overland portion of the DA will require commercial traffic to be rerouted potentially via TLA increasing track miles, fuel burn and ATCO workload.</p> <p>The inclusion of the 'Flamborough CTA' has a potential positive effect in that commercial traffic outbound via the South East can utilise this airspace when routing via OTR/ERKIT. In order for the temp CAS to be fully effective earliest promulgation of its opening would be needed so that it may be utilised by the associated Airlines flight planning teams. However at this stage it is envisaged that there may be a serious commercial impact on routes to the North, East, and West due to the increase in size of the proposed DA.</p>
28/07/20	Operational Impacts	EGNT does not have a dedicated Airspace team and relies solely on operational ATCOs to complete any associated works. Due to the current Covid pandemic and it's far reaching commercial implications it is likely that there will be a reduction in available resource to assist/assess and implement the necessary changes. There will be a need for consultancy work.

		<p>The changes shall incur significant cost to Newcastle, for instance EFPS adaptation, re-write of procedures, additional training, additional manning (possible use of a planner/coordinator within radar and/or potentially having to man an additional position). Increased complexity to the airspace surrounding Newcastle.</p> <p>The Class G area to the North of EGNT has a significant GA community based at Eshott and Athey's Moor, the inclusion of a DA at FL85 directly above may be of concern.</p>
28/07/20	Design	<p>Danger Areas appear to be underutilised. Often DA are active with no observed military traffic. Hand back of DA is often late notice and when long periods of inactivity have already been witnessed. Is such a large change necessary?</p> <p>Concerned about the large incursion over land and in Class G airspace. With a base level of FL85 this will disrupt EGNT/NV air traffic and will require re-routing. The ACP is significantly larger than current DA and surrounds Newcastle to the North and East, is the increase in size necessary given that it appears D513 and D323 are underutilised?</p> <p>More detail is required on how military air traffic will be managed i.e. will there be an increase for requests to EGNT for LARS services?</p> <p>Has the impact of the possibility of increased military emergencies been considered?</p>
28/07/20	Airspace management	<p>Careful consideration will need to be made on the responsibility of EGNV inbound and outbound when the Flamborough CTA is active. Particular concern is for recovering FA20 assess to EGNV.</p> <p>There may need to be protocols or agreements in relation to the above.</p> <p>Current DA activations are NOTAM'd but are often active when there is no military activity observed in the D513 and D323 complexes. Short notice</p>

		<p>cancellations are common and result in commercial aircraft being vectored around the DA unnecessarily. Short notice activation will cause issues for aircraft who may have planned on no DA activity. Recommend that any short notice activation is requested with as much notice as possible and with the agreement of EGNT/NV.</p>
28/07/20	Environment and Noise	<p>Potential for increased track mileage and associated fuel burn for North/East departing/arriving aircraft. New Temp CAS to the South East may increase traffic from present levels and cause increased noise issues for the communities affected.</p> <p>Proposal for increased fast jet traffic to the North of Newcastle will no doubt increase noise complaints from communities in the surrounding area.</p> <p>The proposed overland portion of the DA would cover a significant portion of what is now Class G airspace. This airspace is utilised by a number of small GA sites (Eshott, Athey's Moor) who may be adversely affected.</p>
28/07/20	Other	<p>The trial is proposed to commence in IATA winter which will see a significant reduction in commercial traffic, coupled with the reduction in commercial traffic due CV-19 the trial dates will not give a sufficient representative assessment.</p> <p>There is potential for significant commercial impact as routing to the East and North will be severely hampered by the DA activation. Additional track miles associated with avoiding the area to the North may mean that certain routes out of Newcastle are not commercially viable.</p> <p>Below is a summary of operational feedback received thus far:</p> <p><u>Operational feedback</u></p> <p>Newcastle should have operating authority of the new airway up to FL165. This will keep it uniform with the current upper limit of our operating</p>

		<p>authority with P18, therefore reducing the risk of unintentionally entering controlled airspace without authorisation. This will;</p> <ul style="list-style-type: none"> • Allow us to continue providing a service to DTV EZE inbounds/outbounds without an increase in co-ordination/workload. • Continue to provide a service to Military/civilian transits up to FL160 without an increase in co-ordination/workload. • Allow us to resolve conflicts between NCL inbound/outbounds in the new airway, against transits. <p>Peterlee parachuting – The new airway (CTA 1 – FL45-FL245) southern limit is very close to Peterlee introducing a potential infringement risk. The para droppers operate up to FL160 at times, and with the lateral and vertical limits of this proposed airway and P18 it is limiting the amount of class G airspace for them to operate in. High risk of a rejection from Peterlee.</p> <p>Inbounds following the new airway – Although controlled airspace is largely a benefit, once an aircraft is inside CAS we cannot take them outside, with the exception of an emergency, weather or pilot request. This could potentially reduce our options with inbound aircraft ‘funnelling’ them towards our already small CTR, converging with P18 inbounds. This will impact the amount of aircraft able to fly the full STAR/transition due to an increased need to sequence.</p> <p>New Airway – DTV FA20’s will need to call NCL or transit of new airway.</p> <p>What are the long term plans for P18(N)? Our inbounds/outbounds joining/leaving P18 (N) always leave controlled airspace due to the base being FL165. Therefore this new FCA when active will require all traffic routing that way to file via TLA. This in itself will introduce a risk with the aircraft leaving controlled airspace to the North West, against a potential increase in military traffic routing this way to enter/leave the FCA.</p>
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Annex B – Operational feedback relating to ACP-2020-042.

Date Raised	Observation	Comment
26/03/2021	<p>I'd assumed (incorrectly) that because Swanwick MIL would be taking traffic via TOWTE that this would include all our traffic intending to route South East (ERKIT N110), my understanding was that Swanwick MIL promised the necessary resources. Earlier Swanwick MIL declined VJT645 CRJ2 flight planned via ERKIT and forced us to co-ordinate the traffic via P18 with EAST. Having challenged Swanwick MIL the supervisor called back to advise that the Pennine Radar task was suspended UFN and they'd only take flights via TOWTE if such traffic had intended to route North East. Therefore zero benefit for any traffic hoping to route South East.</p>	<p>Newcastle understanding that Swanwick military would be providing services to all aircraft routing to the South East of Newcastle as per MoD Operating Principle document para 4.3:</p> <p><i>"To ensure continued ATS provision for aircraft operating to / from EGNT and NV via the Copenhagen FIR, SWN (Mil) will provide services to such aircraft as set out in detail within agreed ATC procedures.</i></p> <p><i>SWN (Mil) shall ensure that prioritisation is afforded to such ATS provision and appropriate staffing levels made available during TDA 597 activation to perform this function.</i></p> <p><i>Confirmation of availability of ATS provision shall be provided by SWN (Mil) to the PC Ops Supervisor at D-1. Should SWN (Mil) be unable to work affected traffic the PC Ops Supervisor, shall initiate TDA 597 cancellation via the UK AMC and inform the ASWC of the reason."</i></p>

26/03/2021	<p>Overflight ZSKWP PA34 (EBOS-EGPC) @ FL80 receiving a Traffic Service from Newcastle beneath TDA597 within Class G. Received a call from the TAY sector controller advising that Scampton had requested that Newcastle reroute the traffic to the West due to exercise traffic operating beneath the TDA, placed the Seneca upon a heading and routed the traffic North West above D512B.</p>	<p>Previous assurance that active/inactive exercise traffic will not hold outside of the TDA.</p>
26/03/2021	<p>Dracken Falcons from EGNV have a specific entry point for the TDA to the North West of Newcastle and therefore requested routing through Newcastle airspace, although six aircraft this morning there was meant to be eight. Although not an issue this morning, potentially it could be during normal times.</p> <p>Entry into CAS is never guaranteed and the crews appreciate that, however they're always going to request a service. I wonder whether such traffic requesting a service from Newcastle, during an exercise, should be instructed to file a FPL so that we don't have to create multiple strips.</p> <p>Alternatively an email in advance with sufficient detail that would allow us to prepare. During normal times we'd have to ensure that manning included additional radar resource</p>	<p>Entry into CAS never guaranteed, however, short notice requests by fast moving traffic could be result in a significant safety occurrence.</p> <p>Newcastle request that all related exercise traffic file a flight plan and avoid short notice transit requests.</p>

Annex C - ACP-2021-007 future activations of TDA597 observations

Date Raised	Question	Comment
30/04/2021	Safety Do you think that activation of the airspace will cause any safety issues or raise any safety concerns?	<ul style="list-style-type: none"> Increased fast jet traffic in the vicinity of Newcastle Class D Airspace. Increased potential for confliction with general air traffic in Class D and G airspace. Increase in likelihood of airspace infringement. Increased ATCO workload due to provision of services to exercise traffic. Increased potential for emergency recovery of exercise traffic to Newcastle.
30/04/2021	Operational Impacts Will the activation of the airspace have any operational impact on your operations?	<ul style="list-style-type: none"> Increased de-confliction of general air traffic against exercise traffic. Increased ATCO workload brought about by fast jet traffic requests to transit Newcastle controlled airspace. Potential to require additional Radar ATCO resource and therefore cost.
30/04/2021	Airspace Management Do you have any concerns about how the airspace will be managed?	<ul style="list-style-type: none"> Yes, due to no suppression of D510 (Spadeadam) or D512 (Otterburn) resulting in exercise traffic transiting between the TDA and the danger areas above.

30/04/2021	<p>Air Traffic Management</p> <p>Do you have any concerns about how either civil or military traffic will be routed in or around TDA 597?</p>	<ul style="list-style-type: none"> Continued concern regarding service provision to commercial traffic to the South East of Newcastle. Service has been denied during phase 2 of the trial despite absolute assurances that service provision will be maintained by Swanwick Military. (See operational feedback at Annex B) EGNT traffic routing to the North or East (MADAD, CUTELE etc) will have to route North West (TALLA) or South via P18 increasing track miles, fuel cost and CO2 emissions.
30/04/2021	<p>Environment and Noise</p> <p>Do you expect any noise or environmental impact caused by civil aircraft as a direct result of TDA597 activation?</p>	<ul style="list-style-type: none"> Increase fuel burn and CO2 associated with the elongated routing of commercial traffic around the TDA. Potential for noise complaints in the area surrounding Newcastle, particularly the area north of Newcastle Airport (Northumberland). Public unaware that exercise traffic is not under Newcastle ATC control and therefore wrongly attribute noise to Newcastle Airport.
30/04/2021	<p>Other</p> <p>Do you have any other observations about TDA 597 or ACP-2021-007 in general?</p>	<ul style="list-style-type: none"> As stated at consultation meetings and formally through previous stakeholder correspondence, Newcastle are deeply concerned that any trial conducted during historically low traffic levels will not provide a fair representation of the safety and operational impacts. <p>The success of the trials will form part of the evidence with regard to the full ACP approval and therefore it is critical that any associated trials provide proper and appropriate safety assurance. It is Newcastle's view that the appropriate assurance cannot be achieved in the current operating environment.</p> <ul style="list-style-type: none"> A significant increase in military danger area size surrounding Newcastle Airport will have a detrimental effect on future and existing route viability. It is our view that as a vitally important regional asset, the detrimental impact the TDA will have on route viability will have a negative impact not only on NIA but also on the regional economy.