

Thanks again for your continued engagement, NATS notes that engagement between ASWC, DAATM and NATS has been identified positively during the review of the trial phase two and we would welcome continued early engagement on future activations and ACP planning. NATS offers the following feedback for your **ACP-2021-007**:

In response to some of your specific questions, we do not currently foresee any safety issues with the airspace provided that the structures are promulgated and managed as designed previously and that the procedures agreed are adhered to. A review of these during the planning sessions should ensure this and resolve the issues with non-adherence to the procedures noted in the Mar 21 trial.

There will clearly be an impact to NATS' operations but we believe this has been mitigated in the development and trial of TDA597 and can be managed by the operation. Industry recovery is the unknown factor at present, which could increase complexity and impact as traffic recovers. With this regeneration of traffic will come an increasing burden on the Military ATS provision through RAF(U) SWK which should be considered. Continued consideration should also be given to the original proposals for network connectivity in the Newcastle area for operational, safety and environmental mitigation and improvement.

NATS are content that the proposed, and previously introduced, Airspace management processes work. Such processes shall become a dominant feature in future Airspace Management obligations and should also be viewed considering emerging UK Spaceport requirements, and other new entrants, which will add complexity as well as necessitate tri-party agreements to establish activation priorities.

With regard to the environmental impact, we fully expect there to be an impact as a direct result of this military activity as civil GAT have to circumnavigate the TDA. The previous trial could not provide a clear picture of this impact due to the historical low levels of traffic due to the on-going pandemic. This will need to be a consideration for the MOD approaching and during any future activations during the recovery should the CAA approve the continued use of this airspace.

The operating protocols for the management of TDA597 activation have worked well. A couple of very minor tweaks have been identified by both civil and mil ANSPs already. With that in mind, ahead of any future activation, planning meetings should take place to provide opportunity to review these agreed operating protocols. This will help identify any emerging issues and/or opportunities to resolve or take advantage of them, especially in light of post COVID traffic regeneration. This will be critical as aviation recovers to understand where previous trials have not provided any insights into the impact of the changes due to lack of civil traffic.

During the proposed interim activations of the TDA597, one of the biggest airspace changes to have taken place in UK airspace is planned to be implemented, Free Route. Consideration should be given to this as part of this ACP to determine any impacts to the civil network and en-route airspace users.

Furthermore, NATS notes that the intent of the MOD is to activate the airspace up to ten times in each period. This is a 66% increase when compared with the trial in Mar 2021, four more activations. The network and operational impact will need to be considered for both these points and NATS would welcome more details as soon as possible to ensure that the plans fit with previous arrangements to minimise the impact on the network.

As mentioned in the feedback from the MOD Trial phase two, the Airspace management aspects worked well and we would expect these to remain to ensure the safe management of non-participating network flight planning. This includes the promulgation of airspace

structures in the UK AIP and Eurocontrol Network Manager systems. The current AIP SUP for TDA597 expires on the 6th May and while it is NATS' understanding that this ACP intends to rectify this, we would seek clarity on the timelines for maintaining this information so as not to expend further resources maintaining the airspace design.

Finally, NATS believes that, where possible, any future use of TDA597 should also carry out a review similar to that carried out as part of the Mar 21 trial to inform the MOD permanent ACP. This could provide more insight and supplement the constrained trial data and outputs due to the low civil traffic levels caused by the pandemic during the trial.

As ever, NATS looks forward to continued engagement with you and your teams.

On behalf of NATS, regards

NATS

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Working remotely until further notice

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