

Below are a sample of responses from the Change Sponsor's engagement at Stage 2a – to evidence 2-way engagement. Most of the engagement was via phone calls and several of the stakeholders responded/confirmed via email (latest emails at the top). The replies below are in response to the email at the bottom of this doc.

**From:** [REDACTED]  
**Sent:** 23 October 2018 12:46  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
[REDACTED]  
**Subject:** RE: 20191004-HOLBEACH - Airspace Change Proposal - Design Principles Evaluation  
**Importance:** High

Dear [REDACTED]

Thank you for your CAP1616 Stage 2 Engagement email re: Holbeach EGD207.

Options 5 and 6 would have the greatest impact on NATS Prestwick Centre operations in the Wash region.

The following feedback presumes those two options are those preferred by the MoD:

1. Air operators using Doncaster EGCN and Norwich EGSN may be impacted by an expanded D207.
2. If D207 was extended N as per design options 5 and 6 (up to 23,000ft amsl), it could impact ATS route L603 (lowest FL250) under low pressure conditions.  
D207's upper level should be defined as a FL, i.e. FL230, to remove a potential source of pressure-dependent confliction between EGD207 and adjacent FL-defined ATS route structures.  
Note that nearby ATS route M16 would not be affected (lowest FL290).
3. Contingency ATS route T999 needs to be explicitly considered.
4. The application of the CAA's 2014 policy "Special Use Airspace - Safety Buffer Policy for Airspace Design" ([link](#)) should be explicitly considered in the redesign of EGD207, for L603, T999 and Y70 (the latter route is unlikely to be material but must be considered).
5. There are already various areas defined on airspace charts containing the name "Wash". The MoD should consider (partly?) aligning D207 boundaries with one of those, in order to reduce chart complexity and potential confusion.
6. NATS' East controllers are conscious of the base level change at AMVEL and, where traffic is slow climbing, may elect to provide a deconfliction service if the aircraft fails to make FL245+. This option would be removed if needing to avoid the Danger area and additional vectoring/workload required to remain in the confines of Y70.

7. Whilst the flight planned route for Norwich EGSN arrival traffic is via SUPEL, the ability to route more directly is removed when expanded D207 is active (more applicable where RFL is 170-).
8. Doncaster EGCN eastbound traffic is flight planned to climb through FL160 ROGAG-L603 (base FL245-FL660), with a requirement for East controller to vector to remain in Y70 CAS and transfer to S10 climbing to FL230 (or, as above, provide ATSOCAS service and coordinate to remain beneath but within the confines of L603 to join climbing through FL245). Additional caution would be required when expanded D207 is active, and there are potential RT Failure issues based on the ROGAG-L603 standard route.
9. Doncaster EGCN are currently undertaking an ACP to introduce a new SID to ROGAG (awaiting ACP approval) but NATS has no plans to amend this onward route.
10. There would be an additional workload for Duty Technical Support and a requirement of new EFD strip outfall. In itself this is not considered a particular problem, merely to highlight the consequences of an expanded D207.

Please update us with the next steps and who will be managing the progress of this proposal.

Kind regards

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

**From:** [REDACTED]

**Sent:** 19 October 2018 10:52

**To:** [REDACTED]

**Subject:** RE: 20191004-HOLBEACH - Airspace Change Proposal - Design Principles Evaluation

[REDACTED]

Brief feedback at this stage – the options preferable for Ty trg serials would provide an 8NM radius not contain our in-line bunt strafe pattern on all LOAs, and allow the majority of CAS wheels and attack profiles within the confines of the DA. **Option 3 and 6 (with an 8 nm radius).**

Regards,

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

**From:** [REDACTED]

**Sent:** 09 October 2018 18:23

**To:** [REDACTED]  
[REDACTED]

**Subject:** RE: 20191004-HOLBEACH - Airspace Change Proposal - Design Principles Evaluation

[REDACTED]

No further feedback/comments from Swk Mil.

Regards

[REDACTED]

[REDACTED]  
[REDACTED]  
[REDACTED]

**From:** [REDACTED]

**Sent:** 06 October 2018 14:32

**To:** [REDACTED]  
[REDACTED]

**Subject:** Re: 20191004-HOLBEACH - Airspace Change Proposal - Design Principles Evaluation

Bcc: TC Airspace WG members

[REDACTED]

Many thanks for the opportunity to comment again on your developing ideas for Holbeach Air Weapons Range.

You will know that this is taking place at the same time as many other reviews of UK airspace, including the All Party Parliamentary Group on General Aviation's airspace inquiry. With this inquiry in mind, we have the following observations:

- You have assumed that the only way to sustain the safety of military aircraft using the range is through the exclusion of non-range aircraft. We share the desire to keep aviation as safe as is reasonably practicable. We appreciate that segregation is the historical method adopted in UK but airspace is a finite national asset and every time someone claims a piece for exclusive use, it is denied to all others; that is untenable in the face of increased activity in existing aviation sectors and the expected blossoming of new (e.g. un-manned) activity.
- While we realise that in developing your concepts you will focus first on ‘how much airspace is needed,’ we believe it beholds all airspace owners to examine also how that airspace can be quickly and safely released to other air users both when it is and when it is not in use by the principle party.

To that end it would help if you could share any activity addressing your second, fifth and seventh design principles of “Management of airspace to utilise FUA principles (Efficiency + Airspace Sharing),” “Minimise impact upon the network where possible (Efficiency + Airspace Sharing),” and “Minimise impact upon any other airspace users.”

Kind regards,

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

**From:** [REDACTED]  
**Sent:** 05 October 2018 10:55  
**To:** [REDACTED]  
**Subject:** RE: 20191004-HOLBEACH - Airspace Change Proposal - Design Principles Evaluation

[REDACTED]

I concur with the letter and offer no comments regards that submission.

This is for SA and education (both for myself and the wider military airspace users community) that with the plethora of mission systems available on F-35, even when working with Holbeach controllers and JTACs, there are going to be times when the aircraft are operating a significant distance outside of the AWR, there are numerous factors that for this, some of which will depend on weather, IR conditions, weapon choice, equipment fidelity, etc.

The USAF have a document which may have been referred to frequently during the CAIWG, their Enterprise Range Plan and it has the airspace sizes required to conduct 5<sup>th</sup> Gen trg, one of which is CAS and for that the threshold airspace/range requirement is 40x40nm.

Regards,

[REDACTED]

[REDACTED]  
[REDACTED]  
[REDACTED]

**Change Sponsor's initial engagement below (which refers to the uploaded *Design Principles Evaluation* PDF), with replies above.**

**From:** [REDACTED]

**Sent:** 04 October 2018 17:21

**To:** [REDACTED]

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[REDACTED]

**Subject:** 20191004-HOLBEACH - Airspace Change Proposal - Design Principles Evaluation

## Airspace Change Proposal – HOLBEACH Air Weapons Range – Design Principles Evaluation

Sirs, Ma'am, Ladies & Gentlemen,

1. **Feedback.** Thank you kindly for your feedback on the proposed *Design Options* letter I sent to you on 30 Aug 18 (**Tile 1**). Your feedback has been used to assist in the evaluation of those *Design Options* against the 8 *Design Principles*; the summary of which you will find in the Evaluation letter at **Tile 2**.
2. **What's Next?** Please take the time to digest the *Design Principles Evaluation* letter (**Tile 2**) and return any feedback to the undersigned by COP **19 Oct 18**. There will be continued opportunities to add feedback as we head towards the consultation stage; as well as during subsequent stages.
3. **Point of Contacts.** As always, please let me know if any POC changes, or if you'd like to opt out of being cc'd.

**RAF Coningsby:** [REDACTED]

**RAF Cranwell:** [REDACTED]

RAF Marham: [REDACTED]

RAF Wittering: [REDACTED]

Swanwick (Mil): [REDACTED]

Low Flying: [REDACTED]

Provost Marshall: [REDACTED]

Norwich Airport: [REDACTED]

NATS: [REDACTED]

Natural England (East Midlands): [REDACTED]

[REDACTED]

RSPB

Environment Agency: [REDACTED]

[REDACTED]

MMO: [REDACTED]

HM Coastguards: [REDACTED]

EIFCA [REDACTED]

WNNMP: [REDACTED]

Harbour Masters, Boston: [REDACTED]

[REDACTED]

Harbour Master, Wisbech: [REDACTED]

Trinity House: [REDACTED]

[REDACTED]

DIO Ecologist, Environmental Support & Compliance: [REDACTED]

[REDACTED]

MAUWG Members *(via DAATM)*

#### 4. Platform Stakeholders.

Typhoon: [REDACTED]

Lightning: [REDACTED]

Tornado: [REDACTED]

DAATM: [REDACTED]

RPA: [REDACTED]

P8: [REDACTED]

USAFE: [REDACTED]

41(R) Sqn: [REDACTED]



Hawk: [REDACTED]

JHC: [REDACTED]

JALO: [REDACTED]

Kind regards,

[REDACTED]

[REDACTED]  
[REDACTED]