

# CAP1616 Gateway documentation

## Stage 1: Define Gateway

### Design Principles

Operational Service Enhancement Project:-  
P18 Extension of Times of Availability NATEB – ADN

The NATS logo is displayed in a bold, italicized, blue sans-serif font. A large, light blue decorative swoosh originates from the left edge of the page, curves downwards and to the right, and then loops back towards the left, ending near the bottom right corner.

**NATS**

**NATS Public**

## Roles

Action	Role	Date
Produced	<b>Airspace Change Specialist</b> NATS Airspace Change Compliance & Delivery	September 2021
Reviewed Approved	<b>ATC Lead</b> NATS	October 2021
Reviewed Approved	<b>Airspace Implementation Manager</b> NATS	October 2021
Reviewed Approved	<b>OSEP Project Manager</b> NATS	October 2021

## Publication history

Issue	Month/Year	Change Requests in this issue
Issue 0.5	September 2021	Document written, considered feedback from engagement exercises. Draft distributed to stakeholders for review.
Issue 1.0	October 2021	References in Section 5 updated to include Aberdeen FLOPSC and ACC engagement. Issue submitted to CAA, CAP1616 Stage 1B Gateway

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## 1. Introduction

1.1 This document forms part of the document requirements of the CAP1616 airspace change process, Stage 1 Define Gateway, Step 1B Design Principles. This document may be read in conjunction with the Step 1A Documentation and the Statement of Need available from the [Airspace Change Portal](#).

1.2 As part of the NATS Operational Service Enhancement Project (OSEP), NATS have commenced an Airspace Change Proposal to extend the hours of availability of ATS route P18 between NATEB and ADN, which is currently defined as a Conditional Route 1 (CDR) available Fri (or the day preceding a PH) 1500 (1400) to Mon (or the day following a PH) 1000 (0900); Tue-Fri 0530-0900 (0430-0800). May-Sep, Mon-Thu 1900-0900.

1.3 Increasing the availability of this CDR would enhance connectivity, improve fuel efficiency and reduce green-house gas emissions.

1.4 This change has also been independently highlighted in the CAA Airspace Classification Review (Ref 1). In this review, it was proposed that by extending the availability of P18, less traffic would use P600. This expected lower utilisation of P600 could potentially remove the need for the lower levels of P600 allowing a partial reclassification of these lower levels. Any change to P600 is outside the scope of this ACP and is mentioned here purely as a potential future change enabled by this ACP.

1.5 Within the requirements of the CAP1616 airspace change process, an airspace change sponsor, NATS in this case, needs to identify and communicate the Design Principles (DPs) which are to be applied to the airspace change design.

1.6 Draft DPs have been proposed and distributed via email to stakeholders for feedback and comment, along with some context as to the purpose behind them. This engagement with stakeholders enables NATS to understand the design considerations which are important to them.

1.7 NATS made it clear that these draft DPs were for discussion and that we would welcome feedback to inform the final DPs. Feedback was received from the following 7 Stakeholders:

- British Microlight Aircraft Association (BMAA),
- Ministry of Defence (MoD) through Defence Airspace Air Traffic Management (DAATM),
- British Gliding Association (BGA),
- Honourable Company of Air Pilots (HCAP),
- Aberdeen Airport
- Aberdeen ATC.
- Aberdeen Airport Flight Operations Performance and Safety Committee (FLOPSC)
- Aberdeen Airport Consultative Committee (AIACC)

1.8 This document describes how stakeholders' feedback has influenced the DPs for this Airspace Change.

1.9 A provisional priority was assigned to each of the draft DPs prior to distribution based on NATS' interpretation of the importance of each DP and if there was a requirement to adhere to the DP, as in the case of Safety.

1.10 Engagement on specific design concepts/ options will be carried out in Stage 2, with formal consultation occurring in Stage 3. The design concepts will be evaluated against the final DPs as presented herein.

## 2. Document Layout

2.1 The [Executive Summary](#) lists the DPs, amended as a result of stakeholder feedback, and includes additional DPs added as a result of suggestions from stakeholders.

2.2 [Section 4](#) discusses each DP in turn. In accordance with recommended engagement/ consultation practice<sup>1</sup> this is structured as follows:

<i>We asked</i>	The original discussion text of a potential DP (we sent this out to stakeholders to provide feedback)
<i>You Said</i>	A Summary of how feedback has influenced the DP
<i>We did</i>	Amended final DP

This is repeated for each DP.

2.3 [Section 5](#) summarises the engagement activity, number of responses and stakeholders who were included in the engagement.

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<sup>1</sup> Recommended by the Consultation Institute

### 3. Executive Summary

3.1 The following list summarises the final DPs which have resulted from engagement with relevant stakeholders. Priorities are ranked 1 to 3 with 1 being the highest. These priorities will be considered when the DPs are used to evaluate/rank design options in the later stages of the airspace change process. How the DPs have evolved is described in detail within the following sections.

No	Design Principle	Priority	Category	Notes
1	Maintain or enhance current levels of safety.	1	Safety	
2	Must accord with the CAA's published Airspace Modernisation Strategy (CAP1711) and any current or future plans associated with it.	1	Policy	<i>The CAA have stated that this DP is required by all change sponsors. CAP1711 describes what airspace modernisation must deliver</i>
3	The proposed change will facilitate the reduction in CO <sub>2</sub> emissions per flight.	2	Environmental	
4	The proposed change should result in a cumulative reduction in noise impact per flight.	2	Environmental	
5	The proposed change will facilitate the reduction in fuel burn per flight.	2	Economic	
6	The impacts on MoD airspace users should be minimised.	2	Operational	
7	The impacts on civilian airspace users should be minimised.	2	Operational	
8	The proposed change will provide predictable flight planning capability.	3	Technical	
9	The proposed change will introduce no new flightpaths and therefore no new tracks over the ground.	2	Operational	

## 4. Airspace Design Principles: Feedback and Evaluation

### 4.1 DP1 Safety

#### Original Discussion text

Maintain or enhance current levels of safety.

**Summary and Priority:** NATS did not receive any feedback on the wording or priority of this DP. The wording will remain as proposed. NATS has assigned this DP the highest priority (1), as maintaining or, where possible improvement of safety is at the forefront of any airspace change.

### 4.2 DP2 Policy

#### Original Discussion text

Must accord with the CAA's published Airspace Modernisation Strategy (CAP1711) and any current or future plans associated with it. *(Notes: The CAA have stated that this DP is required by all change sponsors. CAP1711 describes what airspace modernisation must deliver)*

#### How has feedback influenced this DP?

Stakeholder	Feedback	NATS' Response
BMAA	Sponsors must show how they are integrating their proposal within the overall UK Airspace Modernisation context.	This design principle will ensure that the design options considered will align with the CAA's published Airspace Modernisation Strategy.

**Summary and Priority:** NATS did not receive any feedback which suggested any change to the wording or priority to this DP. The wording will remain as proposed. NATS has assigned this DP the highest priority (1), as we must follow the relevant guidance.

### 4.3 DP3 Environmental

#### Original Discussion text

The proposed change will facilitate the reduction in CO<sub>2</sub> emissions per flight.

**Summary and Priority:** NATS did not receive any feedback on the wording or priority of this DP. The wording will remain as proposed. NATS has assigned this DP the second highest priority (2), as the reduction in CO<sub>2</sub> emissions is a principal aim of the OSEP project and a justification of this change.

### 4.4 DP4 Economic

#### Original Discussion text

The proposed change will facilitate the reduction in fuel burn per flight.

**Summary and Priority:** NATS did not receive any feedback on the wording or priority of this DP. The wording will remain as proposed. NATS has assigned this DP the second highest priority (2), as the reduction in fuel burn is a principal aim of the OSEP project and a justification of this change.

## 4.5 DP5 Operational

### Original Discussion text

The impacts on MoD airspace users should be minimised.

**Summary and Priority:** NATS did not receive any feedback on the wording or priority of this DP. The wording will remain as proposed. NATS had proposed assigning this DP as priority **3**. However, we are cognisant of the current and planned military use of airspace and acknowledge it is important not to inhibit these requirements. Therefore, this DP has been reassigned as priority **2**.

## 4.6 DP6 Operational

### Original Discussion text

The impacts on civilian airspace users should be minimised.

### How has feedback influenced this DP?

Stakeholder	Feedback	NATS' Response
BMAA	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 the right to limit airspace access.	<p>NATS cannot guarantee that there will be no impact (including access) to other airspace users. However, this principal highlights the pledge to minimise this. Other airspace user's requirements and locality will be taken into consideration through continued engagement.</p> <p>The scope of this ACP is limited to adjusting the hours of availability of a pre-existing CDR and the Controlled Airspace (CAS) associated with it. There will be no change to the published route of this CDR. Any additional CAS required will be the result of increased availability of this CDR. NATS will fully articulate justification for proposed changes alongside any anticipated impacts for stakeholders.</p> <p>NATS will also ensure adherence to the CAA policy of keeping the volume of controlled airspace to the minimum necessary to meet the needs of UK airspace users.</p>
BMAA	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...	<p>If appropriate, NATS will consider the use of flexible operations to assist with the expedition of traffic. Stakeholders, such as GA communities, will be fully engaged with as part of Stage 2 to gather feedback on proposed designs.</p> <p>However, it should be noted that technology changes associated with GA/ outside of CAS are out of scope, as this proposal solely relates to airspace change.</p>

BMAA	<p>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.</p>	<p>Any proposed changes to CAS volume or classification by NATS will require submission of a comprehensive safety case.</p> <p>The scope of this ACP is limited by the Statement of Need to adjusting the hours of availability of a pre-existing CDR and the airway associated with it. There will be no change to the published route of this CDR. Any additional CAS required will be the result of increased availability of this CDR. NATS will fully articulate justification for proposed changes alongside any anticipated impacts for stakeholders.</p> <p>Any proposed CAS will be the minimum required to deliver a safe and efficient operation.</p>
BMAA	<p>All sponsors must demonstrate that alternatives have been considered such as RMZ and TMZ before considering controlled airspace.</p>	<p>As part of the later Step 2A (Options Development), NATS is required to develop a comprehensive long-list of options that address the Statement of Need.</p> <p>Although it is not possible to pre-determine design options – such as the suggestions made – NATS will provide rationale for all options, before evaluating against the Design Principles.</p>

**Summary and Priority:** NATS received a number of general, non-specific comments related to this DP. Whilst acknowledging this feedback, NATS does not consider a change to the wording is required. The wording will remain as proposed. NATS has assigned this DP the second highest priority (2), as the reduction in fuel burn is a principal aim of the OSEP project and a justification of this change.



## 4.7 DP7 Environmental

### Original Discussion text

The change of environmental impacts to stakeholders on the ground shall be minimised.

### How has feedback influenced this DP?

Stakeholder	Feedback	NATS' Response
Aberdeen Airport/ Aberdeen ATC	As this is a consultation for routes above 7000ft, is there an expectation that you would consult on the change to tracks over ground below? If there is then I would ask that DP7 is changed to say The overall environmental impact to stakeholders on the ground shall be neutral or improved.	<p>Whilst NATS considers the proposed change to DP7 laudable the change to "<i>neutral or improved</i>" environmental impact to stakeholders on the ground could be interpreted as the impact being neutral or positive to all stakeholders. The use of "<i>minimised</i>" as opposed to "<i>be neutral or improved</i>" in the original design principle, allows that whilst some stakeholders might be negatively impacted whilst others will be positively impacted.</p> <p>NATS acknowledges that environmental impact is complicated. For example, an overall reduction in CO<sub>2</sub> emissions, a clear benefit, could result in increased noise for some, a localised disbenefit.</p> <p>To better reflect this a new DP (environmental) will be introduced to consider cumulative noise.</p> <p>The proposed change seeks to increase the availability of an extant more direct route over the sea for aircraft operators to flight plan and as such there would be no new procedures or defined tracks overland introduced. A new DP (Operational) will be introduced to ensure no new tracks are introduced over the ground.</p>

**Summary and Priority:** NATS received feedback which suggested a change to the wording of this DP. This suggestion was considered, however, NATS felt that the use of this change would be overly restrictive. However, following this feedback NATS has included a new DP, specific to the cumulative noise impact of this change to better analyse the environmental impact of this change. The addition of this new DP when coupled with the existing environmental DP relating to CO<sub>2</sub> emissions makes this DP superfluous. This DP will therefore be removed.

## 4.8 DP8 Technical

### Original Discussion Text

The proposed change will provide predictable flight planning capability. (Notes: *Eliminates CDR category not associated with a DA*)

**Summary and Priority:** NATS did not receive any feedback on the wording or priority of this DP. The main wording will remain as proposed. NATS are cognisant of the MoDs intentions to introduce a permanent airspace structure in the vicinity of P18. As such the note will be removed from this DP. NATS has assigned

this DP the lowest priority (3) as whilst improved flight planning capabilities is desirable and a benefit potentially enabled by this change, it is not a driving factor for this change.

#### 4.9 Proposed new DP (Aberdeen Airport and Aberdeen ATC)

##### Proposed Text

Collaborate with other Scottish airports and NATS to ensure that the airspace design options are compatible with the wider programme of lower altitude and network airspace changes being coordinated by the UK Airspace Change programme.

**NATS Response:** Design principles are used to evaluate design options against. Aberdeen's proposed design principle does not relate to a design option but to the airspace change process. Furthermore, NATS considers that the compatibility of this airspace change with the UK route network will be assured through our adherence to the Airspace Modernisation Strategy (AMS) which is captured within DP2. It will therefore not be included in the final set of design principles. Stakeholder engagement is an essential part of the CAP1616 process and consistent with this process, NATS will endeavour to follow a targeted engagement strategy proportional to this change. NATS will continue to play a valued role in future ACP submissions.

#### 4.10 New DP Environmental

In response to feedback received from Aberdeen ATC/airport and the BMAA, the following DP will be added for this ACP:

The proposed change should result in a cumulative reduction in noise impact per flight.

NATS has assigned this DP the second highest priority (2), consistent with draft DPs 3 and 7 to which it relates.

#### 4.11 New DP Operational

In response to feedback received from Aberdeen ATC/airport the following DP will be added to the list of DPs for this ACP:

The proposed change will introduce no new flightpaths and therefore no new tracks over the ground.

NATS has assigned this DP the second highest priority (2), This DP will ensure that no new procedures are introduced, minimising the perceived impact to stakeholders on the ground.

## 5. Engagement Evidence

5.1 NATS has engaged with stakeholders listed in Table 1 below in the development of these DPs. In the initial engagement, feedback was sought on the draft DPs. We received feedback from some stakeholders with most being content with the draft DP's. Aberdeen ATC and Aberdeen Airport proposed a new DP which was not included in the final set of DP's. In response to feedback from Aberdeen ATC, Aberdeen Airport and the BMAA, two new DPs have been introduced. These have been included as DP 4 and DP 10 with the draft DPs renumbered accordingly. Table 1 provides a summary of the engagement activity for this proposal. Email engagement evidence is provided in [Annex A](#). Minutes and slide packs of meetings between NATS and Aberdeen ATC/ Airport, NATS and Aberdeen Airport's FLOPSC, NATS and AIACC as well as NATS and the MOD are included in [references 2 to 7](#).

## We Asked – Emails to relevant aviation stakeholders

5.2 Emails were sent on 21<sup>st</sup> May 2021 to 31 organisations, based on National Air Traffic Management Advisory Committee (NATMAC) contacts, and ATC providers. A return date of 18<sup>th</sup> June 2021 was set. Table 1 identifies all those contacted. A Reminder email was sent on the 7<sup>th</sup> June 2021. A meeting was held with Aberdeen airport on the 9<sup>th</sup> June to discuss the draft DPs and the airspace change. Aberdeen airport was sent the engagement email following this meeting. At this meeting it was agreed that Aberdeen Airport would share the DPs with their Airport Consultative Committee. NATS provided Aberdeen Airport with a slidepack for distribution amongst the ACC and presented this to AIACC on 3<sup>rd</sup> September 2021. AIACC raised no questions in the meeting and confirmed they had no objections or concerns to the DPs presented by email. A meeting was held with the MoD (via DAATM) on the 29<sup>th</sup> June to discuss the draft DPs and the airspace change. DAATM agreed to discuss the change with the units affected.

## You Said – Stakeholder Responses

- 5.3 The response rate was 24.2% (8/33 Stakeholders). These can be seen in Table 1.
- 5.4 Three provided feedback on several of the DPs, which has been used to inform DPs 2, 6 and 7.
- 5.5 One new DP was proposed but focused on the process rather than evaluating the design options.

## We Did

- 5.6 Three stakeholder responses provided comments useable to influence the DPs – included in this document (DPs 2, 6 and 7) and evidenced in [Annex A](#).
- 5.7 Following engagement, two new design principles have been introduced. One Environmental (DP4) and one operational (DP9). One draft environmental design principle (dDP7) has been removed.
- 5.8 A draft version of this document was sent to all stakeholders on 14<sup>th</sup> September 2021. This provided feedback on the two-way engagement and demonstrated the development of the DPs following this engagement.

## 5.9 Stakeholder Engagement Record

(Note: any other organisation or individual were welcome to provide input into the DP development process.)

	Stakeholder	Initial Engagement Email <a href="#">Annex A</a>	Response to Initial Engagement Email <a href="#">Annex A</a>
NATMAC	Airlines UK	Sent 21/05/2021	
	Airspace4All	Sent 21/05/2021	
	Airport Operators Association (AOA)	Sent 21/05/2021	
	Airfield Operators Group (AOG)	Sent 21/05/2021	
	Aircraft Owners and Pilots Association (AOPA)	Sent 21/05/2021	
	Airspace Change Organising Group (ACOG)	Sent 21/05/2021	
	Association of Remotely Piloted Aircraft Systems UK (ARPAS-UK)	Sent 21/05/2021	
	Aviation Environment Federation (AEF)	Sent 21/05/2021	
	British Airways (BA)	Sent 21/05/2021	
	Bae Systems	Sent 21/05/2021	
	British Airline Pilots Association (BALPA)	Sent 21/05/2021	
	British Balloon and Airship Club	Sent 21/05/2021	
	British Business and General Aviation Association (BBGA)	Sent 21/05/2021	
	British Gliding Association (BGA)	Sent 21/05/2021	Response, see Annex A
	British Helicopter Association (BHA)	Sent 21/05/2021	
	British Hang Gliding and Paragliding Association (BHPA)	Sent 21/05/2021	
	British Microlight Aircraft Association (BMAA)/ General Aviation Safety Council (GASCo)	Sent 21/05/2021	Response, see Annex A
	British Skydiving	Sent 21/05/2021	
	Drone Major	Sent 21/05/2021	
	General Aviation Alliance (GAA)	Sent 21/05/2021	
	Guild of Air Traffic Control Officers (GATCO)	Sent 21/05/2021	
	Honourable Company of Air Pilots (HCAP)	Sent 21/05/2021	Response, see Annex A
	Helicopter Club of Great Britain (HCGB)	Sent 21/05/2021	
	Heavy Airlines	Sent 21/05/2021	
	Iprosurv	Sent 21/05/2021	
	Light Aircraft Association (LAA)	Sent 21/05/2021	
	Low Fare Airlines	Sent 21/05/2021	
	Ministry of Defence – Defence Airspace and Air Traffic Management (DAATM)	Sent 21/05/2021	Response, see Annex A
	PPL/IR (Europe)	Sent 21/05/2021	
ATC	Aberdeen ATC	Sent 21/05/2021	Response, see Annex A
Airport	Aberdeen Airport	Sent 09/06/2021	Response, see Annex A
Other	Aberdeen Airport Consultative Committee	Sent 11/08/2021	Response, see Annex A
	Aberdeen Airport FLOPSC	Sent 09/06/2021	Response see Annex A

Table 1: NATS OSEP-P18 Stage 1B Email Engagement Record

## 6. Conclusion

6.1 Throughout the DP engagement, we supplied stakeholders with a set of draft DPs, to promote discussion and welcomed their feedback.

6.2 We received feedback on some of the draft DPs (dDPs 2, 6 and 7). This feedback resulted in the addition of 2 new DPs (DP4 and 9) and the removal of 1 draft DP (dDP 7). We circulated the revised DPs to all stakeholders.

6.3 This evolution has resulted in the list of DP's as detailed in the [Executive Summary](#).

## Annex A: Email Engagement Activity

### A.1 Initial Engagement e-mail, 21<sup>st</sup> May 2021

Dear Colleague,

NATS are currently commencing an Airspace Change Proposal (ACP) to amend the hours of availability of UK CDR P18 between ADN-NATEB. See figure below:

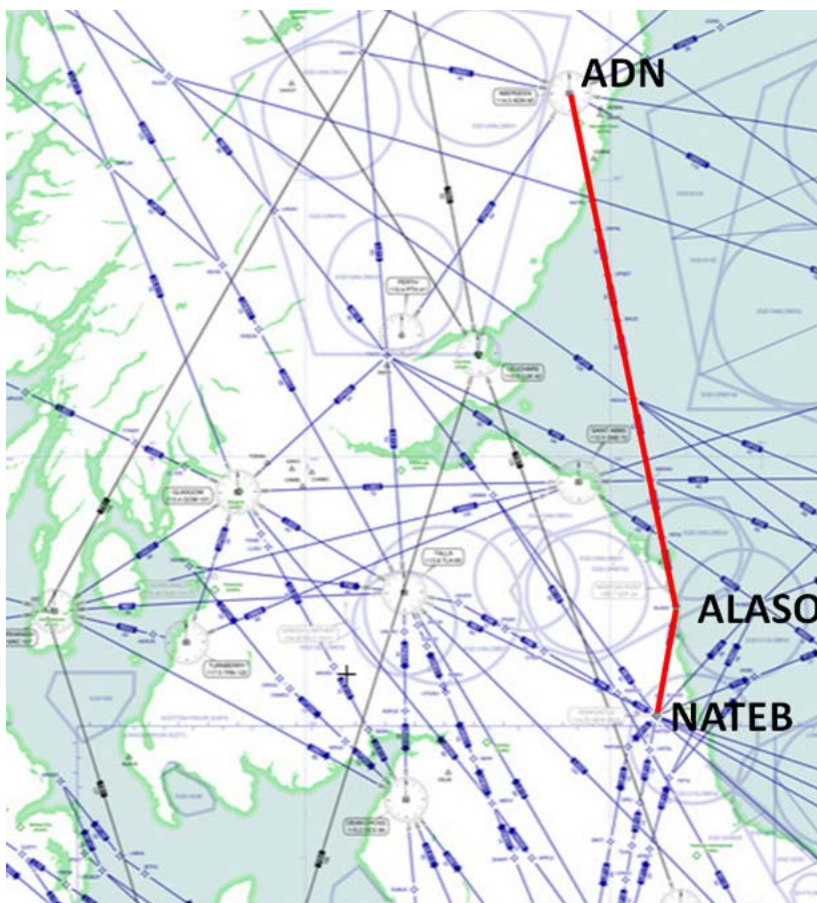


Figure 1: Portion of P18 Designated CDR 1

This ACP is being progressed under the Operational Service Enhancement Project, OSEP.

As part of this process we would like to involve you in the formulation of the Design Principles (DPs) which will be used during this submission. This is required as part of the UK CAP1616 Airspace Change process.

[Further details on this ACP can be found on the CAA portal by following this link.](#)

Below are the draft set of DPs for this Airspace Change. Please can you review these and give us your comments.

If you have any suggestions for additional design principles, we will welcome your input.

If you are content with the proposed design principles, please press the "Approve" voting button or reply "Approve".

If you have comments, please reply to this email and annotate the table below.

#	Design Principle	Category	Priority	Notes	Stakeholder Comments
1	Maintain or enhance current levels of safety.	Safety	1		
2	Must accord with the CAA's published Airspace Modernisation Strategy (CAP1711) and any current or future plans associated with it.	Policy	1	The CAA have stated that this DP is required by all change sponsors. CAP1711 describes what airspace modernisation must deliver	
3	The proposed change will facilitate the reduction in CO <sub>2</sub> emissions per flight.	Environmental	2		
4	The proposed change will facilitate the reduction in fuel burn per flight.	Economic	2		
5	The impacts on MoD airspace users should be minimised	Operational	3		
6	The impacts on civilian airspace users should be minimised	Operational	3		
7	The change of environmental impacts to stakeholders on the ground shall be minimised.	Environmental	3		
8	The proposed change will provide predictable flight planning capability.	Technical	3	Eliminates CDR category not associated with a DA	
9	<i>Add further suggested Design Principles HERE</i>				
10					

We would appreciate your feedback for the OSEP-P18 draft DPs by 18<sup>th</sup> June 2021. Many thanks for your time.

Best regards

NATS Airspace Change Team

## **A.2 DP reminder e-mail, 7<sup>th</sup> June 2021**

Dear Colleague,

We recently wrote to you regarding the Design Principles for an Airspace Change Proposal NATS are progressing to amend the hours of availability of UK CDR P18 between ADN-NATEB, which may affect you (see below). Should you wish to respond we would appreciate your input by June 18<sup>th</sup> so that we can consider your feedback.

Best regards

NATS Airspace Change Team

## **A.3 Final DP reminder e-mail, 14<sup>th</sup> June 2021**

Dear Colleague,

We recently wrote to you regarding the Design Principles for an Airspace Change Proposal NATS are progressing to amend the hours of availability of UK CDR P18 between ADN-NATEB, which may affect you (see below). Should you wish to respond we would appreciate your input by this Friday June 18<sup>th</sup> so that we can consider your feedback.

Best regards

NATS Airspace Change Team

## **A.4 Final DP e-mail, 14<sup>th</sup> September 2021**

Dear Colleague,

We recently wrote to you requesting feedback on the draft Design Principles for the OSEP P18 Airspace Change Proposal.

Thank you to those who responded and provided invaluable feedback to this process.

Please find attached the response document which contains the final version of the Design Principles we will submit to the CAA.

Kind regards

NATS Airspace Change Team.



A.5 Email from Aberdeen ATC Sharing Draft DP with Aberdeen Airport for distribution to the Airport Consultative Committee, 9<sup>th</sup> June 2021

Afternoon all,

Following this morning's briefing by the NATS Airspace Change team on the proposals for increased availability of Airway P18, please find below the initial engagement e-mail recently distributed by the NATS team and also attached are the slides from this morning's presentation.

Best regards,



Watch Manager – Operations Support



Control Tower Building,  
Aberdeen Airport,  
Dyce,  
Aberdeen AB21 7DU.

A6 Response of BMAA to Draft Design Principle e-mail, 24<sup>th</sup> May 2021

Please find attached our response to your request for input for determination of design principles.

CE

[MICROLIGHTS GO TO 600KG – MORE INFO + FULL FAQ HERE](#)

*British Microlight Aircraft Association – The natural home of microlights*



## 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...

27/08/19

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### 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.

27/08/19

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A.7 Response to BMAA requesting clarification of GASCo response, 27<sup>th</sup> May 2021

Dear [REDACTED],

Thank you for your response from the BMAA regarding the Design Principles for this Airspace Change Proposal. Our records indicate that you are the NATMAC contact for both the BMAA and the General Aviation Safety Council (GASCo). Could you please confirm if your previous response covers both organisations or if it only covers the BMAA?

Kind regards



Airspace Change Specialist

A.8 Response of DAATM to Draft Design Principle e-mail, 7<sup>th</sup> June 2021

Dear NATS,

From a MOD perspective DAATM will collate all MOD input and comment for this ACP. At the DP stage, we have no further comment and agree that the DPs listed below are suitable.

Regards

[Redacted]

[Redacted] | SO2 Airspace Operations | Defence Airspace and Air Traffic Management |  
Aviation House | 1E Beehive Ringroad Crawley West Sussex RH6 0YR | [Redacted]  
[Redacted]

**A.9 Response of the British Gliding Association to Draft Design Principle e-mail, 8<sup>th</sup> June 2021**

Thanks.

We have no comments.

Kind regards

[REDACTED]  
British Gliding Association

**A10 Response of the Honourable Company of Air Pilots to Draft Design Principle e-mail, 9<sup>th</sup> June 2021**

Please note that the Honourable Company of Air Pilots do not have any comment to make on your proposal.

Regards,

[REDACTED]  
Director of Aviation Affairs  
The Honourable Company of Air Pilots  
Cobham House  
9 Warwick Court  
Gray's Inn  
LONDON WC1R 5DJ  
[www.airpilots.org](http://www.airpilots.org) [REDACTED]

**A11 DP response reminder email to Aberdeen Airport and Aberdeen ATC for Draft Design Principles, 28<sup>th</sup> June 2021**

Good Morning,

I hope you are all well. During our previous engagement, it was indicated that we would receive feedback from Aberdeen ATC and Aberdeen Airport on the draft design principles for this ACP at the end of last week (25<sup>th</sup> June).

We have not yet received this feedback and was hoping you could provide some indication as to when this may arrive.

Kind regards

[REDACTED]



[REDACTED]  
Airspace Change Specialist

## A12 Response of the Aberdeen Airport and Aberdeen ATC to Draft Design Principle e-mail, 9<sup>th</sup> June 2021

Apologies [REDACTED] for the delay. I would ask that the following DP is added:

Collaborate with other Scottish airports and NATS to ensure that the airspace design options are compatible with the wider programme of lower altitude and network airspace changes being coordinated by the UK Airspace Change programme.

I would also ask for clarity on DP7. As this is a consultation for routes above 7000ft, is there an expectation that you would consult on the change to tracks over ground below? If there is then I would ask that DP7 is changed to say

The overall environmental impact to stakeholders on the ground shall be neutral or improved.

My only concern on this is to ask how you will measure this? Will you carry out modelling? We would seek your steer and CAA feedback on what is expected of ABZ in this case as we would not wish to undertake any consultation relating to community noise impact ahead of our own ACP process. Would Aberdeen be able to join the network points without any query from CAA of change in tracks over the ground? If easier to talk on the phone please let me know.

Best Regards,

[REDACTED]



Aberdeen | Glasgow | Southampton

[REDACTED]

**Group Head of Aerodrome Strategy**

AGS Airports



[REDACTED]



[REDACTED]

[www.agsairports.co.uk](http://www.agsairports.co.uk)



Glasgow Airport, Erskine Court, St Andrews Drive, Paisley, PA3 2TJ

#### A13 Email to Aberdeen Airport Requesting FLOPSC minutes, 24<sup>th</sup> August 2021

Hi [REDACTED]

Hope you are well. [REDACTED] presented the proposed P18 ACP to your FLOPSC on 29 July but we have not yet received a copy of the minutes. Is it possible to get a copy please as we will need to submit them as engagement evidence for the ACP. We will redact everything not related to the P18 proposal however, the CAA will see an unredacted version.

Kind regards

[REDACTED]



[REDACTED]  
Airspace Change Specialist

E: [REDACTED]

[REDACTED]  
4000 Parkway, Whiteley,  
Fareham, Hants PO15 7FL  
[www.nats.co.uk](http://www.nats.co.uk)

#### A14 Email from Aberdeen Airport containing FLOPSC minutes, 24<sup>th</sup> August 2021

Hi [REDACTED]

Apologies for that – I will have just sent the minutes out to the standard FLOPSC list, but the notes are attached here with the P18 project at the end of page 3 and top of page 4.

Best regards,

[REDACTED]



[REDACTED]  
Watch Manager – Operations Support

D: [REDACTED]

M: [REDACTED]

E: [REDACTED]

Control Tower Building,  
Aberdeen Airport,  
Dyce,  
Aberdeen AB21 7DU.

## A15 Email to Aberdeen Airport for distribution to the AIACC, 11<sup>th</sup> August 2021

Hi [REDACTED]

Thank you for the feedback. I have reviewed the slides and made changes so that they explain more and highlight the areas of likely impact. Where possible we have paired back the technical information making it more accessible. There is information contained within the slides which the ACC members might not be interested in, ie. The planned location of the military Special use airspace. However, it is crucial that the stakeholders are presented with the complete picture, (as it is at this stage) to inform their feedback.

The ACC engagement is crucial to this change as we are unlikely to progress through the Stage 1 and subsequent gateways without it. We agree that a Teams meeting is probably most beneficial, however we are mindful of our timelines which was why we were adopting a "slidepack to share" approach. As it is, we are not going to be able to meet the proposed Stage 1 submission date and will need to contact the CAA to amend this. To keep with our planned timeframe, we would like to propose to the CAA a combined Stages 1 and 2 in September. This has a document submission date 10<sup>th</sup> September which means we would need the ACC feedback by the latest 3<sup>rd</sup> September to incorporate it into the documentation. This does not fit with the planned ACC scheduled meeting in October but if they are able we would be prepared to hold a meeting prior to then to present the stage 1 and 2 material and answer any questions they have. If we are unable to meet before then, to meet our planned timeframe we would need to keep to the planned approach of sharing the slide pack and engaging via email.

Kind regards

[REDACTED]  


[REDACTED]  
Airspace Change Specialist

E: [REDACTED]  
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**A16 Email to AIACC following ACP Presentation, 3<sup>rd</sup> September 2021**



Thank you for the opportunity to provide a briefing to the ACC for our proposed airspace change regarding P18, as suggested I have attached a copy of the presentation.

May I request ACC feedback on the airspace proposal via email by 13<sup>th</sup> September, as this will assist with the overall airspace change process.

In addition we would appreciate a copy of the ACC minutes and associated presentations when available.

Many Thanks



Airspace Implementation Manager  
Prestwick Centre

D: 

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**A17 Email From AIACC containing minutes, 7<sup>th</sup> September 2021**

Good Afternoon

Please find attached the minutes and slides from last week's AIACC meeting.

Regards



AIACC Chairman.

A18 Follow up Email to AIACC, 7<sup>th</sup> September 2021

Dear [REDACTED]

Thank you for the timely provision of the minutes from the AIACC meeting last week.  
Could you please confirm that we will receive your feedback to the Design principles and design options for the P18 Airspace Change by 13<sup>th</sup> September as requested.

Kind regards

[REDACTED]



[REDACTED]

Airspace Change Specialist

E [REDACTED]

[REDACTED]

4000 Parkway, Whiteley,  
Fareham, Hants PO15 7FL

[www.nats.co.uk](http://www.nats.co.uk)

A19 AIACC DP response, 13<sup>th</sup> September 2021

Morning [REDACTED]

No comments from AIACC,

As you could gauge from the meeting and presentation, there were no objections or concerns.

Regards

[REDACTED]

[REDACTED]

AIACC Chairman

## Annex B: References

Reference	Description	Link
1	CAA Airspace Classification Review Summary	<a href="#">Link</a>
2	Slidepack presented to Aberdeen Airport/ATC 9 <sup>th</sup> June 2021	<a href="#">Link</a>
3	Minutes of meeting between NATS and Aberdeen Airport/ ATC 9 <sup>th</sup> June 2021	<a href="#">Link</a>
4	Slidepack presented to MoD via DAATM 29 <sup>th</sup> June 2021 and Aberdeen FLOPSC 29 <sup>th</sup> July 2021	<a href="#">Link</a>
5	Minutes of meeting between NATS and MoD (via DAATM) 29 <sup>th</sup> June 2021	<a href="#">Link</a>
6	Minutes of Aberdeen FLOPSC meeting 29 <sup>th</sup> July 2021	<a href="#">Link</a>
7	Slidepack presented to AIACC meeting 3 <sup>rd</sup> September 2021	<a href="#">Link</a>
8	Minutes of AIACC meeting 3 <sup>rd</sup> September 2021	<a href="#">Link</a>

## Annex C: Glossary of Terms

ACC	Airport Consultative Committee
ACP	Airspace Change Proposal
AIACC	Aberdeen International Airport Consultative Committee
ANSP	Air Navigation Service Provider
ATC	Air Traffic Control
ATS	Air Traffic Service
CAA	Civil Aviation Authority
CAP	Civil Aviation Publication
CAP1616	Document providing guidance on the regulatory process for changing airspace design including community engagement requirements.
CAS	Controlled Airspace
CDR	Conditional Route
CO <sub>2</sub>	Carbon Dioxide
DA	Danger Area
DAATM	Defence Airspace Air Traffic Management
DP	Design Principle
FLOPSC	Flight Operations Performance and Safety Committee
H24	Available 24 hours a day
MoD	Ministry of Defence
NATMAC	National Air Traffic Management Advisory Committee
NATS	UK Air Navigation Service Provider
OSEP	Operational Service Enhancement Project
PH	Public Holiday

