

Director of Operations
Newcastle International Airport Ltd
Woolsington
Tyne & Wear
NE13 8BZ

28th October 2021

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RAF S02 A7
Training Enablers
HQ11 Group
Air Command
Hurricane Block
RAF High Wycombe
Walters Ash
Bucks
HP14 4UE

Dear ████████████████████

Thank you for contacting Newcastle International Airport (NIA) and inviting comment in respect of the September activation of ACP-2021-007, which has followed on from the previous trials ACP-2021-042 and interlinks with ACP-2020-026; as well as seeking feedback on the proposed ACP-2021-048, which essentially requests to provide a further temporary solution to accommodate numerous further activations in August and September 2022.

As with our previous correspondence, it is still our considered view that the true impact of these ACPs has not yet been properly evaluated during the previous stages due to the prevailing operating environment created by the Covid-19 pandemic. At this juncture, we remain concerned that once normal levels of operation are restored flight safety may be compromised.

As stated previously we also have concerns regarding the elongated routing that may be required on occasion by our commercial airline traffic, were this permanent change to be unconditionally 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. We also retain our concern that the size of the footprint that has previously grown from that initially specified within the original scope and in particular that it now includes a significantly increased over land area. Given that the inclusion of environmental impacts will form part of the CAA's decision-making process for airspace change proposals; can I suggest that you work with NATS to start building a picture of the overall environmental impact to support Stage 2B of ACP-2020-026 and that any data you have from this recent trial is shared.

Around 50% of our controlled airspace infringements to date in 2021 have occurred from military aircraft. Whilst this has not been directly related to the most recent temporary activation, it does highlight our concern that should this large danger area become permanent and given its locality to the Newcastle CTA; that it would potentially create further infringements in future thereby reducing safety to our commercial air traffic.

It was also previously demonstrated within your trials that military movements frequently breach the air space containment area and it is therefore our view that increasing the footprint increases the potential impact on safety, routing and consequently the efficiency of NIAL bound aircraft operations.

Furthermore, the significant increase in the over land area has added to our concerns relating to the community impact. Indeed during the September activations, we found that on several occasions exercise traffic were requesting an airspace crossing from Newcastle on the way to and from the danger area, with the return journey often being labelled as 'fuel critical'. This adds extra pressure to our team at Newcastle in handling traffic crossing what is becoming an increasingly complex piece of airspace.

To reiterate our previously articulated concerns as set out in our previous correspondence remain and have not yet been addressed or subjected to any meaningful consultation. We are supportive of the need to conduct further trials but cannot support the proposed future activations for 6 days in August 2022 and near the whole of the month of September; two of our busiest months which will have a material impact on our business. Given your recent email suggested 2 major exercise per annum with up to 9 activations per exercise so a maximum of 18 activations to now find a trial for 21 days in two months seems somewhat disingenuous.

It is our perception that no matter what feedback you get there is little scope for anything other than the MoD driving their needs above and to the detriment of others.

We do not wish to be unnecessarily obstructive and will engage with you and your colleague [REDACTED] positively, when we meet with our Chief Operating Officer [REDACTED] on 3rd December 2021 with the aim of trying to find a harmonious way forward for all parties.

Yours sincerely,

[REDACTED]