



Dear

Please find attached a response from the British Microlight Aircraft Association (BMAA) to your request for initial views on design principles for ACP-2020-092 Stage 1B. If the proposal is to be entirely above FL245 it is very unlikely to affect any of our members' activity.

Regards

MICROLIGHTS GO TO 600KG - MORE INFO + FULL FAQ HERE

British Microlight Aircraft Association – The natural home of microlights



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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 Page 1 of 2



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

- 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.



Thanks for the engagement.

The principles appear to be reasonable.

Please note that gliding can be impacted above FL245 where TRA(G)'s exist above that level – see UK AIP ENR 5.2. Regards

BGA



Sat 21/08/2021 16:33

 \leftarrow Reply \ll Reply All \rightarrow Forward \cdots

Mon 23/08/2021 13:13

○ Air-FastJetAreasProposal (MULTIUSER)

follow up. Start by 23 August 2021. Due by 23 August 2021.

If there are problems with how this message is displayed, click here to view it in a web browser.

Hi Stuart,

I'm responding on behalf of Swanwick Military. We have no objection to the proposals as described. I would ask that you keep us updated however as inevitably the introduction of these areas, if successful, will have an impact on our operation.

On a related note I'd be really appreciative if you could let me know as soon as possible once you get any hints that this is going to be approved (along with the exact geographical coordinates of the area) as it will take some time to implement appropriate maps on our controllers' surveillance displays: if I leave it until you have formal approval (Sep 22 AIRAC?) I won't be able to provide mapping overlays and that could well have a direct impact on the service we provide to the Exercise. I've copied DAATM in as well with a view to asking them the same request.

Many thanks,

| Intelligent Customer/Projects/Airspace | 78 Sqn/Swanwick Mil |

ACP-2020-092 - Honourable Company of Air Pilots response



As requested in your email of 20 August, please find a response by The Honourable Company of Air Pilots.

Regards,



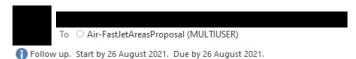


Wed 25/08/2021 12:25

Annex A to Inclusion of FJAs into UK AIP (ACP-2020-092) — Airspace Change Proposal Stage 1B Engagement

ACP-2020-092 Airspace Design Principle Engagement Response

Please composed on the compose	plete the following short questionnaire providing feedback on the	proposed design principles for ACP-2020) -
Do you agre	ee that these principles meet the Statement of Need?		
X Yes	□ No		
Do you have	e any observations or concerns about the design principles?		
□ Yes	X No		
Are there a	ny omissions or additions you feel should be considered for inclusi	ion?	
□ Yes	X No		
Detail			
Please prov aware of.	ide any further comments, suggestions or considerations in relatio	on to this airspace proposal that we shou	ıld be
Detail			
No furt	her comment at present.		



 \leftarrow Reply \ll Reply All \rightarrow Forward \cdots

Thu 26/08/2021 09:32

Morning

Please find the response from 11Gp.

Do you agree that these principles meet the Statement of Need?

Yes

Do you have any observations or concerns about the design principles?

No

Are there any omissions or additions you feel should be considered for inclusion?

No

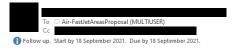
Please provide any further comments, suggestions or considerations in relation to this airspace proposal that we should be aware of.

ACP-2020-026 is in progress with the aim of creating a SUA off the East coast of England/Scotland of sufficient dimensions to cater for 5th Gen ac. It would be worth considering the impact to the network should all of these areas be active concurrently and designing a protocol to minimise disruption or to deconflict activations.

Regards,



I am routinely working from home. Please use e-mail or Skype as the primary methods of contact.





NERL Response to ACP-2020-092 – Inclusion of FJAs into UK AIP – Stage 1B Design Principles Engagement

Thank you for your engagement on the proposed Design Principles (DP), stage 1b, in support of your ACP to include the Fast Jet Areas in the UK AIP. The table below presents our feedback on individual DPs. Further comments follow after.

	MOD D	
DP#	MOD Design Principles The airspace design must be safe, with any	NATS proposals and feedback NATS agrees and considers that
1	haz airspace design must be sare, with any hazards identified and risks mitigated such that they are as low as reasonably practicable and tolerable.	safety is a priority.
2	The design will provide a suitable training area to meet the following core requirements: Is within reach of Navy Forces, more specifically a Carrier Strike Group (with embarked 5th generation air systems) operating within Deep Water, which through the development of the scenario is likely to span hundreds of miles. Provides a sufficient mixture of overland and overseas areas which offers exercise planners flexibility to create more complex scenarios across both environments, for necessary littoral and amphibious operations. Crucially caters for kinetic and non-kinetic ranges within the area, which allows for necessary Air Land integration. Is of large enough size to accommodate representative operational numbers.	Given the title of the ACP is "Inclusion of FJAs into UK AIP" it would imply the dimensions of the area shall be the same as those currently published for FJA North and South within the Mil AIP which would satisfy this DP.
3	Safe, efficient and standardised management, notification and activation of airspace, utilising Flexible Use of Airspace (FUA) principles.	NATS agrees that this is a key DP and proposes a further linked DP #7 below
4	Will be FL 245 and above and suitable dimensions to minimise impact on other airspace users and the network, where possible.	See response to DP#2
5	Minimise noise and environmental impacts, where relevant.	Considerations for noise and environmental impacts should be separated as two distinct DPs so we would suggest splitting these out. In line with DP4, it is queried whether any noise requirements above FL246 are necessary in the CAP1616 process.

The following DPs are proposed in addition:

6	Minimise environmental impacts, where relevant	As per feedback to DP5
7	The design shall provide a Flight Plan Buffer Zone (FBZ) for the purposes of Free Route Operations and flight planning	Provides clarity on airspace design and required FUA structures.
8	Protocols for the prioritisation of area activation shall be established to minimise the accumulative overall effect of Defence airspace needs on other airspace users.	This is key to network management

It is noted that in the Stage 1b Engagement Letter, there is no reference to FJA South East. It is mentioned in the SoN, and as it is encompassed by FJA South it is assumed that it is intended to be captured within the scope of this change. NATS would seek clarity on this in due course, particularly with regard to the requirement for an FBZ design for all FJAs.

Finally, in the submission text, the following is stated:

The introduction of Free Route Airspace at the end of 2021 makes current solutions untenable to deliver the required needs of Defence during Ex Joint Warrior, as the Fast Jet Areas will cease to exist. Using alternate airspace would diminish required training objectives for Defence and increase the risk to all air users to an unpalatable level.

This statement is not correct. The FJA are included within FRA. The requirement from the EU NM is for them to be published within the AIP. This aligns with DP3. At present they are not, which means that we have asked the EU NM to work outside of their process. They have agreed to do this on the understanding that a change process is in hand i.e. this ACP to include the FJAs in the UK AIP.

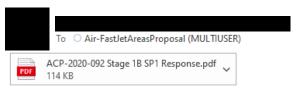
Please do not hesitate to get in touch if you have any further questions. We look forward to continued early engagement on your ACP.

Regards



Working remotely until further notice







Hi

I am responding as the Programme Director for Spaceport 1 on the Outer Hebrides. Sincere apologies for missing your deadline, but this got to me quite late and I was OOO last week. I thought I would respond in case the CAA specifically ask if we have been approached (as we have ACPs running for similar areas, via QinetiQ).

I have no problem at all with the proposal, but you will see that I have requested a bit of notice so we don't promise customers launch times that will be problematic. As ever, comms and deconfliction will solve any and all issues.

Many thanks.

Kind regards,

REFLECT SOLUTIONS

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Annex A to Inclusion of FJAs into UK AIP (ACP-2020-092) — Airspace Change Proposal Stage 1B Engagement

ACP-2020-092 Airspace Design Principle Engagement Response

Act 2020 032 Anspace Design Concepts Engagement Response
Please complete the following short questionnaire providing feedback on the proposed design principles for ACP-2020-092.
Do you agree that these principles meet the Statement of Need?
X Yes □ No
Do you have any observations or concerns about the design principles?
☐ Yes X No
Are there any omissions or additions you feel should be considered for inclusion?
☐ Yes X No
Detail

Please provide any further comments, suggestions or considerations in relation to this airspace proposal that we should be aware of.

I am responding in the capacity of Programme Director of the proposed spaceport (Spaceport 1 at Scolpaig, North Uist).

The southern area is likely to have a significant impact on our operations when activated. However, and importantly, we will not routinely plan to undertake launch activity while a Joint Warrior is underway, in order to minimise any confliction issues. I would have a concern about access to this airspace if it's activation were to proliferate beyond Joint Warrior, for other exercises for example.

With this is mind, and given the potentially long lead times for launch activity (e.g. clients are already discussing 2024 launches with us), and the needs of some clients to have precise launch timings to meet specific orbital insertion points, it would be helpful to have significant advance warning of the intention to activate the airspace.