



Ministry  
of Defence

HQ 11 Group  
RAF Air Command  
Hurricane Block  
RAF High Wycombe  
Walter's Ash  
Buckinghamshire

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8 Dec 2021

## **ACP 2020-026**

### **GATEWAY DOCUMENTATION: STAGE 2 Develop and Assess**

#### **2a Design options and evaluation**

#### **Annex A: Stakeholder engagement feedback**

## **Annex A: Stakeholder feedback**

Stage 2 engagement has been ongoing with stakeholders since 1<sup>st</sup> July. The draft stage 2A document was sent to 74 recipients with feedback received from 14 agencies. A survey with direct questions was attached to the engagement which attracted 4 responses.

This annex contains redacted responses from those stakeholders who replied and the email reply from the sponsor.

The email sent to stakeholders was as follows, a draft of document 2a, options development was enclosed as an attachment:

**Sent: 1 July 2021**

**Subject: ACP-2020-026 Engagement**

Dear aviation stakeholders,

I have taken over from Wing Commander [REDACTED] as the sponsor for the Airspace Change Proposal 2020-026 and look forward to working with you throughout the process, I am sure I will meet some of you face to face, Covid restrictions allowing.

Thank you for the input you have provided thus far, the process is now at stage 2, develop and assess. The aim of this stage is to carry out an *initial* appraisal of the impacts of the options, which will be explored in more depth later. The appraisal will be modelled on the factors the CAA is required to consider under section 70 of the Transport Act 2020.

The options development paper is attached to this email, this explains the proposal in detail. Please take the time to consider the proposal and complete the questionnaire at [this link](#). If you prefer, feel free to reply directly to this email address with any questions or concerns. In order to meet the agreed timeline please complete your replies by **13<sup>th</sup> August 2021**.

Agencies not replying by this date will be recorded as “nil return”.

*Mike*

**Sqn Ldr M I Parker MCGI RAF** | SO2 A7 Training Enablers | HQ 11 Gp | Air Command | Hurricane Block | RAF High Wycombe | Walters Ash | Bucks | HP14 4UE | **Skype:** 03001 641013 | **Email:** [air-airspacetrail@mod.gov.uk](mailto:air-airspacetrail@mod.gov.uk)

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

A Microsoft Form was hyperlinked from the email which asked the following specific questions:

Do the options presented align with the design principles?

Will the implementation of the options affect your traffic patterns below 7000'?

How will the implementation of the options affect your operation?

Do you have any further comments?

Would you like the ACP sponsor to contact you directly for a one to one discussion?

### **Responses to the survey**

The 4 responses received to the MS Forms survey are as follows:

#### **Borders Gliding Club**

Do the options presented align with the design principles?

No, The initial design principles stated that the base height of the proposed TDA would be FL85. The latest proposal suggests that the base height will be 7000'.

Will the implementation of the options affect your traffic patterns below 7000'?

Yes, see answer below.

How will the implementation of the options affect your operation?

Gliders from Borders Gliding Club routinely climb to FL100 (and above to FL195 by NOTAM). A 7000' base height would restrict gliding operations to below this height when the TDA is active.

Do you have any further comments?

As mentioned in previous responses, mutual co-ordination and co-operation will be essential in order to allow the Borders Gliding Club to plan its activities and flying operations. If not, the Club could face substantial financial losses, particularly when it hosts expeditions and competitions involving large numbers of visiting glider pilots who expect to be able to enjoy the high altitude soaring that Milfield offers.

Would you like the ACP sponsor to contact you directly for a one to one discussion?

No.

#### **British Gliding Association**

Do the options presented align with the design principles?

No, They negatively impact gliding activity through exclusion.

Will the implementation of the options affect your traffic patterns below 7000'?

Yes, see the answer below.

How will the implementation of the options affect your operation?

Gliders fly from the surface to heights in excess of 7000' in the area proposed.

Do you have any further comments?

We need to understand how the proposal will accommodate existing SUA for soaring, ie TRA(G)'s.

Would you like the ACP sponsor to contact you directly for a one to one discussion?

Yes. (This email trail is included in this document).

### **British Balloon and Airship Club**

Do the options presented align with the design principles?

Yes

Will the implementation of the options affect your traffic patterns below 7000'?

No

How will the implementation of the options affect your operation?

Hot air balloons rarely operate above 2000'.

Do you have any further comments?

Nil

Would you like the ACP sponsor to contact you directly for a one to one discussion?

No

### **Leuchars Diversion Aerodrome**

Do the options presented align with the design principles?

Yes

Will the implementation of the options affect your traffic patterns below 7000'?

Yes.

How will the implementation of the options affect your operation?

LDA primary task is to support Defence Task 1 (DT1) for QRA(I) North & South. Any restriction of airspace around LDA presents challenges in meeting this task. Our TACAN based IFR recoveries use an IAF to the east up to a max of FL190 (Point A Rwy 26 min 4000' QFE, Point B Rwy 08 min FL120). Both IFR and VFR in/outbounds (MIDs 1 - 4) operate up to FL 190 within the proposed dimensions. The options cause further challenges by creating a Class G airspace bottleneck to the north, south and west of LDA. We have regular IFR civil traffic in/out of Dundee operating above FL 85 (inbounds routing to RNAV points east and west of LDA). Station based Tutor aircraft operate overland within 15 nms of LDA up to FL 80 as do multiple GA units.

Do you have any further comments?

Clearly the impact of the preferred option for the majority of our routine traffic is reduced with a base level of FL 85. However, the resulting bottleneck in the shared Class G airspace will have a significant impact on traffic in/out/transiting LDA airspace that is or requires to operate above FL 85. The bottleneck, with multiple

ATS agencies operating in it to avoid the new MDA and its proximity to controlled airspace, will significantly limit our vectoring options and inevitably increase our workload. (LDA operates a single bandboxed radar position with one controller working all radar traffic). For us the greatest risk arises when concurrent activity is taking place in and around this bottleneck.

Would you like the ACP sponsor to contact you directly for a one to one discussion?

Yes. (This email trail is included in this document).

## Email responses

NATS

From: [REDACTED]  
Date: 11 Aug 2021

Dear Mike,

Thank you for your continued engagement on your ACP-2020-026 and the opportunity to provide feedback on your options developments stage (2a).

The following is a consolidated response from NATS En-route (NERL):

For options 1-3, it is not clear how the design elements associated to the network and circumnavigation of the area by other airspace users when active has been considered. Within the UK AIP Supplements associated with both the initial trial (ACP-2020-042) and interim activations (ACP-2021-007) additional reporting points were established to facilitate flight plan routings. Such arrangements were introduced on a temporary basis and any permanent establishment of a Danger Area of this size must also be accompanied with permanent solutions for the safe re-routing of GAT.

As this is identified as the second priority within the design principles, DP(e), NATS would welcome further information on this aspect.

Furthermore, as the frequency of operation will be a significant factor in this aspect NATS would seek further clarity around this and the proposed management of activities to minimise the impact on other airspace users. NATS understanding, through previous engagement, is this change is to support two exercise periods a year. Any proposed increases to this and indeed the time allocated within exercise periods, will have a direct impact on DP(d), DP(e), DP(g), DP(i) and DP(j).

Traffic regeneration will need to be considered in the development of this ACP. MOD acknowledged the lack of traffic to provide any meaningful measurements during the trial (ACP-2020-042). NATS will be interested in how the MOD and Sponsors intend to address this and would seek early engagement on this matter given its direct relation to DP(d), DP(e), DP(g), DP(i), DP(j) and DP(k).

Alongside the airspace design, Airspace management protocols and agreements will be equally, if not more important, to minimise the impact on the other airspace users, the network and CO2 emissions as a direct result of the airspace activations.

In Options 1-3, no consideration is given to the impact on Newcastle Airport and in particular the removal of connectivity to the Copenhagen FIR as a result of activations.

Within the original ACP associated to the initial trial, the MOD proposed the introduction of the Flamborough CTA to facilitate such connectivity, which was subsequently not carried forward. This was as a result of the refusal by the CAA to approve this proposal, given the limited number activations associated with the trial period. Instead, the MOD amended their application in favour of Air Traffic Service (ATS) provision by 78 Sqn ATC, Swanwick (Military) to certain affected aircraft.

The obligation to provide ATS to affected GAT by Swanwick (Military) is considered a short-term measure that carries risks to all parties and in particular the sponsor of the change, given the caveat within the MOD/NATS agreement on activation. This caveat requires confirmation 24hrs in advance that 78 Sqn, Swanwick (Military), has the capacity to undertake this ATS provision and should confirmation not be provided or circumstances change, there is a risk that protocols are followed to cancel the activation.

As a result of the permanent nature of this proposed change, NATS would strongly advocate that the Flamborough CTA element of the initial proposal be re-introduced and thereby allow a long-term sustainable solution to be taken forward. This would contribute to DP(c), DP(e), DP(g), DP(h), DP9(j).

Within the design options provided the MOD emphasises on page 11:

*"It is important to note that the existing D323 and D613 complexes, when both active create a funnel for any traffic routing via the east coast of the UK. With use of the special use airspace at option 1, it is anticipated that D323 and D613 would not be active concurrently".*

NATS seeks clarification on this principle. 'Anticipated' implies that the MOD may have alternative aspirations and as set out in the MOD/NATS agreement to support both the initial trial and interim activations and to ensure the safe and efficient flow of traffic: EG D323 A to R, EG D613 A to D, EG D513 A to C, EG D412, EG D712 A to D and unpublished: Fast Jet Areas North, South and South East (associated to Exercise Joint Warrior) will not be available for concurrent activation. Further airspace management (ASM) timing protocols are also established to meet several DPs, including DP(e), DP(h), DP(g), DP(k) and especially DP(i), which is fundamental to successfully managing the wider network and flows of traffic.

As acknowledged in the engagement documentation and previous reports and feedback on the associated trials airspace, the downturn in traffic due to the COVID-19 pandemic severely constrained the ability to measure the impact to other airspace users, the network management (traffic flows, sector complexity) and resultant impact on CO2 emissions. The options do not make it clear how this will be addressed to meet the associated DPs. NATS would welcome the opportunity to discuss how and what has been modelled or assessed so far to understand collaboratively any further opportunities to meet the DPs.

NATS requests that MOD clarifies its intent and confirms that it will abide by agreements previously reached that mitigate for the overall effect of its airspace requirements and would welcome the opportunity to discuss how the MOD intends to demonstrate continuity in the proposed designs.

In relation to Option 3, NATS does not believe that Air to Air Refuelling (AAR) or Admin areas warrant the creation of further segregated airspace. Whilst MOD acknowledges spill out of traffic during the trials, the ability of participants to wholly contain themselves within a Danger Area volume does not clearly demonstrate a connection in the option with AARA and admin areas. It is the responsibility of the participant to ensure they stay within the designated area - as laid out in CAP740 Policy. The requirement for other airspace is a separate matter in NATS opinion.

It is not clear why such activities cannot be contained within the overall airspace volume or de-conflicted using co-ordination methods. UK AAR is not currently conducted in segregated airspace. Consequently, further detailed evidence to support the provided assertion that; *"This option would not necessarily increase the footprint of the aircraft involved but by segregating the airspace further, would increase safety"*, would be needed in order to fully justify its inclusion. For example, has any safety analysis been or intended to be conducted to support this option (relating to excursions and spill over), as prescribed within CAA Policy for the Establishment of Permanent and Temporary Danger Areas, and would this require a further review of procedures associated with current AAR procedures and management processes?

The preferred Option 1 as proposed (and utilised in the Mar trial), in essence, closes the Montrose sector which would increase load on adjacent sectors Humber, S10 & S11 due to airline re-routes. Any increase in the lateral dimensions for air to air refuelling and force regeneration would further constrain upper air routes/flows, reducing the re-route options available, potentially increasing safety risks that could require further mitigation through regulation and require significant work to implement new ATS routes and circumnavigation. This would have a negative impact on DP(c), DP(e), DP(g), DP(h), DP9(j).

NATS would not, therefore, support this option without further detail from the sponsor on this requirement as well as further analysis on the impact to GAT, civil sectors complexity and associated costings to revise the design.

As a minor observation the 'Design Principles' submission has a slight error (page 6) in the consolidated list being taken forward into Stage 2. DP(b) is stated as being Priority 2 at para 2, however it is shown in table 1 as DP Priority 4.

I trust this feedback is useful for your ACP and, as ever, NATS would welcome continued early engagement on its development to ensure it can best meet those DPs that affect the network and civil operations.

Please don't hesitate to get in touch if you would like to discuss further.

On behalf of NATS

Regards



**NATS**



Airspace & Future Operations

Working remotely until further notice

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



**From:** air-airspacetrail@mod.gov.uk

**Date:** 22 Aug 2021

**To:** [REDACTED]

[REDACTED]

Thanks for the consolidated reply you have sent. In answer to the first question you raise, absolutely right and we would like to work with you to implement similar processes to those used in the trial activation and the temporary activation in September. The preferred option 1 would reflect the D597 construct.

It is anticipated that the cadence of activations would not be too different to the current pattern. There would definitely be 2 major exercises per year in addition to 6 x 3 hour activations per month in Feb, Jun and November. However this is not a firm forecast as developments in aircraft may require the additional space afforded by this SUA more frequently.

The lack of representative traffic levels is recognised and we would like to work with you to see if expected traffic levels could be modelled in order to assess the impact. This is something the MOD cannot do and I hope you can help us out with this to assess the impact on the network and CO2 emissions.

Newcastle have been included in the engagement and will be consulted in further depth during the next phase. The implementation of the Flamborough CTA appears to be the safest and most expeditious instrument to facilitate connectivity. Again I would like to work with you to convince the CAA.

I welcome your points to option 3 and will take these into account when assessing the most suitable option to take forward.

I request your support in the modelling and construction of the permanent solutions needed to support this permanent change and look forward to meeting in the near future,

Kind regards,

*Mike*

**Sqn Ldr M I Parker MCGI RAF** | SO2 A7 Training Enablers | HQ 11 Gp | Air Command | Hurricane Block | RAF High Wycombe | Walters Ash | Bucks | HP14 4UE | **Skype:** 03001 641013 | **Email:** [michael.parker575@mod.gov.uk](mailto:michael.parker575@mod.gov.uk)



Airfield Owners Group

**From:** [REDACTED]  
**Date:** 9 July 21  
**To:** Air-AirspaceTrial (MULTIUSER) <Air-AirspaceTrial@mod.gov.uk>

Dear Sir,

Thank you for your email. I sit on NATMAC as the representative of the Airfield Owners Group. This organisation serves some 70 of the smaller U.K. Airfields.

As owner of Old Buckenham airfield, I also attend the East Anglian Airspace users group meetings which pre COVID were held at R.A.F. Marham.

I fully appreciate the need for our forces and those of our allies to have the best possible training facilities. Given the relatively small geographical footprint of the U.K. this must present something of a challenge. I am pleased that most of the area is offshore and also (probably) mostly at altitudes which will present little interference to GA traffic, except presumably where activated by NOTAM.

The "cats cradle" illustrations are incomprehensible on an iPad even utilising the zoom function. I assume that the area boundaries differ at various altitudes.

I am sure that airfields likely to be affected by the inauguration of the enlarged training area will have been consulted as stakeholders. To date I am not aware of any of our members being sufficiently adversely affected that they have sought assistance from their representative organisation.

Thank you for all you do to keep us all safe.

Best regards,

[REDACTED]

Chairman A.O.G.  
Sent from my iPad

**From:** Air-AirspaceTrial (MULTIUSER) <Air-AirspaceTrial@mod.gov.uk>  
**Date:** 9 July 21  
**To:** [REDACTED]

Sir,

Thanks for your reply, in response to your comments, yes, finding large enough areas of airspace is a challenge and we recognise that it is there to be used and shared by all. We do need some overland areas on which we can site targets and threats and have tried to minimise these and situate them in less densely populated areas to avoid noise pollution. The diagrams are more representative than detailed with co-ordinates at the moment but the base level is not likely to be below FL80 and will be activated by NOTAM when used, which would be relatively infrequently.

You are one of many stakeholders and, as you correctly state, those airports most affected are also being involved in this engagement process.

Thanks for your involvement,

*Mike*

**Sqn Ldr M I Parker MCGI RAF** | SO2 A7 Training Enablers | HQ 11 Gp | Air Command | Hurricane Block | RAF High Wycombe | Walters Ash | Bucks | HP14 4UE | **Skype:** 03001 641013 | **Email:** [michael.parker575@mod.gov.uk](mailto:michael.parker575@mod.gov.uk)

Number 3 Flying Training School, RAF Cranwell

**From:** [REDACTED]

**Date:** 16 July 21

**To:** Air-AirspaceTrial (MULTIUSER) [Air-AirspaceTrial@mod.gov.uk](mailto:Air-AirspaceTrial@mod.gov.uk)

Mike

Many thanks for the info and presentation. In outline, the proposed airspace won't affect 3 FTS Operations for the overwater areas, however without further clarity on the geographical land area, I cannot yet give a formal "no affect to 3 FTS operations".

For your feedback (this is mainly predicated on your diagram Page 9 for the orange airspace. The proposal at Option 2 wouldn't affect us if north of Newcastle and above FL85):

- Do the options presented align with the design principles?
  - Concur with assigned Priority 2 (page 6) to minimise impact on other airspace users and the network. However this is predicated on how many large-scale exercises occur and confirmation that the base level is FL85.
- How would the implementation of the options impact on your operation?
  - 3 FTS Phenom operations regularly uses the Lincs AIAA Sector 2 area (south of the Humber feet dry) block FL 80-120.
  - 3 FTS Prefect operations regularly the same area to FL100. Due to the other options to the south and west, this is not a major concern for short term exercise periods.
  - Special use area that encroached in to this airspace would potentially effect 3 FTS operations depending on the base altitude (proposed FL85), lateral land boundaries and frequency of use.
- Do any of the options affect your traffic pattern below 7000'?
  - No.
- Do you have any other comments?
  - All dependent on the base level and lateral extent inland south of the Humber. If this is not the proposed COA then no affect on 3 FTS operations and we can stand down as a stakeholder.

[REDACTED] **Senior Naval Officer | 3 FTS DDH Senior Operator Phenom T Mk1, Grob 120TP Prefect** | RAFC Cranwell | Sleaford | Lincolnshire | NG34 8HB | [REDACTED]

Skype [REDACTED]

**From:** Air-AirspaceTrial (MULTIUSER) <Air-AirspaceTrial@mod.gov.uk>

**Date:** 9 July 21

**To:** [Redacted]

Sir,

Thanks for your reply, it appears that the MOD preferred option will not affect your operation but if this is rejected and further investigation is needed into other locations then I will engage further.

Kind regards,

*Mike*

**Sqn Ldr M I Parker MCGI RAF** | SO2 A7 Training Enablers | HQ 11 Gp | Air Command | Hurricane Block | RAF High Wycombe | Walters Ash | Bucks | HP14 4UE | **Skype:** 03001 641013 | **Email:** [michael.parker575@mod.gov.uk](mailto:michael.parker575@mod.gov.uk)

Teesside Airport ATS

**From:** [Redacted]

**Date:** 16 July 21

**To:** Air-AirspaceTrial (MULTIUSER) <Air-AirspaceTrial@mod.gov.uk>

Dear Sir,

Teesside International Airport ATS have reviewed your document and have no comment to make at this time.

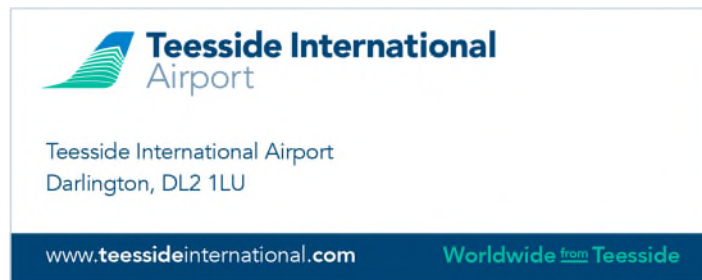
Kind regards,

[Redacted]

[Redacted] | Head of Air Traffic Services

[Redacted]

[Redacted]



Teesside International Airport Limited, Registered in England & Wales: Company Number 02020423: Registered Office: Cavendish House, Teesdale Business Park,

Stockton on Tees, Tees Valley, TS17 6QY.

BAE Systems Warton

**From:** [REDACTED]  
**Date:** 27 July 21  
**To:** Air-AirspaceTrial (MULTIUSER) <Air-AirspaceTrial@mod.gov.uk>

Mike,

Please find below comments from BAE Systems Warton (against your questions from the Stage 2a Options Development Paper); of note we have no preference of Design Option.

Regards

Andy

- Do the options presented align with the design principles?  
From our perspective, yes.
- How would the implementation of the options impact on your operation?  
Without understanding whether any activation of the proposed airspace will result in other military assets having to migrate to airspace over the Irish Sea (as articulated in our Stage 1b response), we are not in a position to make a full analysis. We would also need to understand how the establishment of such airspace influences the flow of GAT from Europe and its subsequent routing over UK airspace to their Oceanic entry points; might this push traffic which would ordinarily take a northerly flow to route instead over the Iris Sea? For a number of operational and technical reasons, Irish Sea airspace is the main area where test and development flying from BAE Systems site at Warton is undertaken; any increase in other aerial activity within that area may well have consequences.

Furthermore, we would be interested to understand how the proposed airspace structure will be integrated into the Free Route Airspace construct due for implementation in December 2021 (subsequent phases to follow) and whether Irish Sea airspace will be affected by any re-routed GAT flight profiles impacted by activation of the new airspace.

- Do any of the options affect your traffic pattern below 7000'?  
No
- Do you have any other comments?  
As per our response at Stage 1b, we note that military area ATC service provision during 2019 and 2020 (notwithstanding COVID 19) has often been sporadic; we were aware of the staffing issue at 78 Sqn (Swanwick (Mil)). Indeed, BAE Systems was often called upon to provide services to military aircraft to cover the shortfall and to ensure the military task may continue unhindered. In establishing this additional airspace, has service provision been considered?

[REDACTED]  
Deputy SATCO

Air Traffic Control  
Warton Aerodrome

T: + [REDACTED]

Air Traffic Control W240, Warton Aerodrome, Preston, PR4 1AX

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BAE Systems (Operations) Ltd  
Registered Office: Warwick House, PO Box 87, Farnborough Aerospace Centre, Farnborough, Hants, GU14 6YU, UK  
Registered in England & Wales No: 1996687

**From:** Air-AirspaceTrial (MULTIUSER) <Air-AirspaceTrial@mod.gov.uk>

**Date:**

**To:** [REDACTED]

Hi [REDACTED],

Thanks for your response regarding ACP-2020-026. At this point I am not looking at a full analysis however you do raise interesting points about the routing of GAT. The airspace at the preferred option has already been trialled in Mar this year and will be activated again as TDA 597 in September, Sqn Ldr [REDACTED] at the Air and Space Warfare Centre is the sponsor for this under ACP-2021-007. I will be liaising with Swanwick Mil throughout the process and they also have the opportunity to provide their input.

Kind Regards,

*Mike*

**Sqn Ldr M I Parker MCGI RAF** | SO2 A7 Training Enablers | HQ 11 Gp | Air Command | Hurricane Block | RAF High Wycombe | Walters Ash | Bucks | HP14 4UE | **Skype:** 03001 641013 | **Email:** [michael.parker575@mod.gov.uk](mailto:michael.parker575@mod.gov.uk)

**From:** Air-AirspaceTrial (MULTIUSER) <Air-AirspaceTrial@mod.gov.uk>

**Date:**

**To:** [REDACTED]

Hi Andy,

Further to my last email I have asked the sponsor of ACP-2021-07, Sqn Ldr [REDACTED] to include you when collating feedback from the temporary activation of D597 next month, details [here](#),

Kind regards,

*Mike*

**Sqn Ldr M I Parker MCGI RAF** | SO2 A7 Training Enablers | HQ 11 Gp | Air Command | Hurricane Block | RAF High Wycombe | Walters Ash | Bucks | HP14 4UE | **Skype:** 03001 641013 | **Email:** [REDACTED]

Edinburgh Airport

**From:** [REDACTED]  
**Date:** 13 Aug 21  
**To:** Air-AirspaceTrial (MULTIUSER) [Air-AirspaceTrial@mod.gov.uk](mailto:Air-AirspaceTrial@mod.gov.uk)

For attn Sqn Ldr Mike Parker

Mike,

Good morning and hope all is well.

Please find a response from Edinburgh Airport for your Stage 2 engagement attached. I am encouraging ANSL our ANSP to also respond by COP today.

We look forward to further engagement and a solution that suits all of us.

Kind regards and have a good weekend.

[REDACTED]

[REDACTED]

Head of Airspace



Edinburgh Airport Limited  
Capital House

Almond Avenue  
Edinburgh, Scotland  
EH12 9DN

[REDACTED]

w: [edinburghairport.com](http://edinburghairport.com)

t: [twitter.com/edi\\_airport](https://twitter.com/edi_airport)

fb: [facebook.com/edinburghairport](https://facebook.com/edinburghairport)

The attached letter is below.

Sqn Ldr Mike Parker MCGI RAF  
SO2 A7 Training Enablers  
HQ 11 Gp



Edge | Empower | Expertise | Energy | Execute | External focus

Edinburgh Airport Limited  
Capital House

Air Command  
Hurricane Block  
RAF High Wycombe  
Walters Ash  
Bucks  
HP14 4UE

Almond Avenue  
Edinburgh, Scotland  
EH12 9DN

12<sup>th</sup> August 2021

Email: Air-AirspaceTrial@mod.gov.uk

## **Future Combat Airspace – Airspace Change Proposal ACP-2020-026**

### **Stage 2 Develop and Assess**

Dear Sqn Ldr Parker,

Thank you for your email dated 01 July 2021 with reference to Stage 2 engagement of ACP-2020-026.

We would like to express some concern and request further in-depth engagement as you offer in the document.

In answer to the questions presented on page 15:

*Do the options presented align with the design principles?*

The options presented (and we agree No. 1 is the preferred option for you but not us) do align with some of the design principles but not all, for instance DP(e) Minimise impact on other airspace users and the network. Notifying the activity of the airspace would do this but you do not explain in the document how this would be achieved. Likewise, the issue in DP (h) Minimise the impact to Commercial Air Traffic flow, sector complexity and sector capacity. To evaluate whether this will be achieved we need an explanation rather than just dimensions of airspace.

It is difficult to evaluate your DPs against a block of airspace that has been designed effectively, with a buffer zone but doesn't have explanations of how for instance minimising complexity in flight planning is achieved.

*How would the implementation of the options impact on your operation?*

Option 0 would have the least effect as there is no change.

Option 2 would have some but a lesser effect just by the fact that it is smaller dimensionally than Options 1 and 3 and therefore fewer of our arrivals and departures (normally routing through this airspace) would need to route around.

Options 1 and 3 would have the most detrimental effect as these would increase track mileage and therefore carbon burn on our commercial traffic to a greater extent than option 2.

*Do any of the options affect your traffic pattern below 7000'?*

As there is a buffer zone between the ScTMA and the proposed Danger Area then there is no discernible effect on our current traffic pattern however please see our further comments.

*Do you have any other comments?*

Edinburgh Airport are currently engaged as the sponsor for an Airspace Change Proposal at Edinburgh (ACP-2019-32) looking to establish PRNAV SIDs, Approach transitions and PRNAV Approaches and will be working with stakeholders such as ANSL (our ANSP), Glasgow Airport, NATS and to a lesser extent the MoD to provide the best solution that allows the airport to thrive commercially and operate efficiently. This airspace change will include improvements to flight paths to the east of Edinburgh so we seek reassurance that the establishment of this airspace proposed by ACP-2020-26 will be infrequent and the activation of this airspace will be coordinated with NATS so that any new flight paths that we establish will be used for maximum benefit during times of deactivation. This is our main concern at this time, and we look forward to future engagement.

We also note the feedback from your trial

“As with the phase one of the trial, the continued downturn across the aviation industry due to the COVID-19 pandemic has resulted in a slower than anticipated regeneration of the aviation sector. Unfortunately, as with phase 1, the network traffic levels during this period have been an unrealistic reflection of the usual aircraft routings and density which has constrained any effective measure of the overall effect during the trial times. That said, the introduction of TDA597 had an increased impact on the operation due to the increased volume of segregated airspace. NATS believes that the success of this trial from a civil perspective has been in the application of FUA structures and clear and timely ASM protocols to deconflict multiple activations of segregated airspace. This has and will continue to minimise the impact to other airspace users, has partly proven environmental benefit and made Military LFE exercises safer when compared to previous CACA airspace. Such processes shall become a dominant feature in future Airspace Management obligations and should 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. NATS looks forward to continued engagement on your ACPs and seeing how the trial activities help to ensure a future design that supports the network and civil users as we navigate our way out of the current pandemic crisis.”

Although this trial was handled well with positive feedback from NATS the true complexity of the operation will only be seen when traffic returns to what we think will be more realistic levels in the near future.

Thank you for your correspondence and we look forward to working with you and our stakeholders to provide the best solution for all concerned.



Yours sincerely,

[REDACTED]

Head of Airspace

[REDACTED]

[REDACTED]

w: edinburghairport.com

t: twitter.com/edi\_airport

fb: facebook.com/edinburghairport

**From:** Air-AirspaceTrial (MULTIUSER) <Air-AirspaceTrial@mod.gov.uk>

**Date:** 16 Aug 21

**To:** [REDACTED]

Hi Simon,

Thanks for your response to ACP-2020-026. I have read your comments in conjunction with the feedback for the trial ACP-2020-042, there are 2 further pending activations of the airspace in Sep 21 and Mar 22 under ACP-2021-007, these will give us further evidence and opportunity to engage.

In initial response to the points you raise, with regards to the cadence of activations, it is expected that there will be 2 major exercises per annum, with up to 9 activations per exercise lasting up to 3 hrs. In addition it is predicted that there will be 6 smaller exercises throughout the year, (2 in the months of February, June and November) with 3 activations per exercise. These activations amount to just over 100 hours per annum. However I must stress that these are current expected levels and to promise future levels would be disingenuous of me.

Notification of airspace activation will be via the Military Airspace Management Cell via the Airspace Usage Plan with a corresponding Flightplan Buffer Zone. We will work with NATS to provide alternative reporting points to circumnavigate the airspace.

Further detailed consultation will take place during stage 3, by which time hopefully traffic levels will have increased and there will be evidence from the activation of TDA 597 for Exercise Cobra Warrior,

Kind Regards,

*Mike*

**Sqn Ldr M I Parker MCGI RAF** | SO2 A7 Training Enablers | HQ 11 Gp | Air Command | Hurricane Block | RAF High Wycombe | Walters Ash | Bucks | HP14 4UE | **Skype:** 03001641013 | **Email:** [REDACTED]

Royal Navy ATM Safety

**From:** [REDACTED]

**Date:** 16 Aug 21

**To:** [Air-AirspaceTrial@mod.gov.uk](mailto:Air-AirspaceTrial@mod.gov.uk)

Morning Mike,

I was asked to co-ordinate the responses to this ACP on behalf of NCHQ. Please see below answers to the four questions you asked for specific feedback on.

- Do the options presented align with the design principles?
  - Yes.
- How would the implementation of the options impact on your operation?
  - No impact.
- Do any of the options affect your traffic pattern below 7000'?
  - No.
- Do you have any other comments?
  - No further comments.

Please let me know if you need anything further.

PS. Apologies for the late response, I sent this email on 6 Aug but for some reason it got stuck in my out box.

Yours Aye,

[REDACTED]

[REDACTED]

Newcastle International Airport

**From:** [REDACTED]  
**Date:** 13 Aug 2021  
**To:** air-airspacetrail@mod.gov.uk

Hi Mike,

Welcome to the role and we are very keen to support the process as articulated in the attached. We will respond to your request but, to my knowledge, we never got a response to the attached. As a consultation this needs to be a 2-way process rather than us commenting and then silence. CAP 1616 details the need for engagement with those potentially affected by the change in Stage 1. I may be mistaken, and I am not in the detail, but it does look as if you have not formally followed the Regulatory process.

We will meet the deadline below but I suggest we need to address the attached before moving into Stage 2 to ensure we meet the Regulatory guidance and process.

[REDACTED]

[REDACTED] **I Chief Operating Officer I** Newcastle International  
**DDI:** [REDACTED]



Newcastle International  
Your Airport

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The attached document referred to in this email that which was sent in response to Stage 1b and can be seen below prior to my email response. The other documents attached will be sent unredacted to CAA.

4 February 2021

[REDACTED]  
92 Squadron  
HQ Air & Space Warfare Centre  
RAF Waddington  
LN5 9WA

Dear Sqn [REDACTED]

## **Response on behalf of Newcastle International Airport to ACP-2020-026 Future Combat Airspace for Military Collective Training – Step 1B Design Principles**

Thank you for contacting Newcastle International Airport (NIA) and inviting comment in respect of the Design Principles – Step 1B of the CAP 1616 Airspace Change Proposal (ACP) process. The CAA states that the “design principles encompass the safety, environmental and operational criteria and the strategic policy objectives that the change sponsor seeks to achieve in developing the airspace change proposal”. It also states: “An important part of Step 1B is for the design principles to be drawn up through discussion between the change sponsor and affected stakeholders at this early stage in the process.”

NIA has been regularly engaged with the Ministry of Defence (MOD) during the planning and activation of the Trial Airspace [ACP–2020-042] that is associated with this ACP, but this is our first engagement with the permanent ACP process. Whilst this response is in respect of the permanent ACP, we understand that data gathered during the two separate phases of the trial may influence this ACP in the future. We would suggest that the use of this data, as it was collected in a period when movements were c5-10% of normal, will skew conclusions drawn and that the process should be mindful of the extraordinary circumstances in which it was gathered.

NIA understands the requirements of the MOD, and the Royal Air Force (RAF) in particular, to practise specific aspects of flying in multi-national packages, whilst employing high-energy manoeuvres and simulated weapon delivery tactics. These activities clearly require separation from all other aviation activity including Commercial Air Transport (CAT) and recreational flying, to be conducted safely. However, the segregation of large volumes of airspace, which is a finite resource in the UK, has second and third order consequences on those other activities, often with a financial or an environmental burden. In the case of NIA, any additional financial burden will be in addition to the unprecedented impact that COVID19 has had for a period of time fast approaching 12 months, with no clear plan for recovery emerging.

The MOD has chosen to distribute its Design Principles (DPs) to stakeholders to invite comment, hence the purpose of this response. Whilst it is undoubtedly intentional that the DPs are high level, NIA is concerned about the priority each has within the ACP moving forward. These DPs will underpin the design options for the airspace, and NIA seeks reassurance that the key drivers are not simply to satisfy the requirements of the MOD. In order of importance, we suggest the DPs should be prioritised as listed below:

1. The airspace design must be safe, with any hazards identified and risks mitigated such that they are as low as reasonably practicable and tolerable.
2. Minimise impact on other airspace users and the network, where possible.

3. Minimise noise and environmental impacts, where relevant.
4. Safe, efficient and standardised management, notification and activation of airspace, utilising Flexible Use of Airspace (FUA) principles.
5. The training area will be within efficient reach of RAF / United States Air Force (Europe) (USAFE) Main Operating Bases.
6. The design will provide a suitable training area to meet the following core requirements: a. Full tactical employment of aircraft and weapon capability. b. Supersonic flight and rapid height changes. c. Use of high and low altitude activity concurrently. d. Representative employment ranges of simulated air-air and air-surface weapons. e. Representative formation numbers with opposing forces (>80 aircraft).
7. The design will provide a sufficient overland portion for running tactical scenarios, siting targets and simulated threats that facilitate representative collective training in a contested electromagnetic environment.

In terms of the first DP, we agree that safety is paramount. We would expect NIA to be involved in Focus Groups at Stage 2, (Develop Design Options) stage and would wish to be invited to any Hazard Identification Workshops proposed by the MOD. NIA has concerns about how large numbers of fast jets operating at the extremes of their envelope, some of which may be air forces from other states and therefore potentially unfamiliar with UK procedures, will be handled. We would presume that Swanwick Military would retain control of aircraft, although some may be under the control of RAF Boulmer or other Air Defence controllers. An understanding of any potential military and displaced air activity outside of the proposed ACP needs to also be considered as part of Stage 2.

The second DP listed recognises the significant impact any new airspace restriction is likely to have on established flight profiles. Therefore, the use of the words 'where possible' indicates that this is not as high a priority for the MOD. We consider that the DP listed above as No 4 is a sub-set of DP No 2. The principle of employing FUA is one mechanism that should facilitate the minimal impact to other aviation users. FUA should ensure that suitable notification of activation takes place, allowing flight crews to plan to avoid the airspace and have sufficient fuel loads to route around it. Recognising that the airspace will not be permanently active, NIA seeks clarification on the cadence of activation proposed, and the duration that the airspace will be activated.

The Assessment Meeting Presentation published on the CAA ACP Portal suggests that the airspace will be required: "As required to meet collective training requirements. Currently forecast to be 2 periods of ~ 18 activations per year. Duration is ~3 hours". NIA would like to understand if this is a maximum number of activations permitted. Does this figure include an allowance for scrub days due to poor weather etc? The presentation also indicates a likely activation period of between 0930 – 1230 (L). We would like to understand if the exercises are likely to be planned all year round, or if they could perhaps be limited to November to March (IATA winter period) on the basis that winter schedules will potentially have a lower impact than during the summer schedule. We request that this DP is re-drafted to remove the words "where possible".

DP 3 concerns the intention to minimise noise and environmental impacts. As a military ACP, we understand that it will not be necessary to assess the impact of aircraft operating within the new airspace, but the potential environmental and noise impacts caused by the rerouting of CAT and other aviation will need to be assessed. This is considered to be a higher priority for NIA than the core military requirements.

NIA is concerned that any increase in fast jet activity within the vicinity of the Airport may be considered by some stakeholders to be associated with NIA activity. NIA seeks assurance that full engagement with non-aviation stakeholders will make this clear during Stage 2, and Stage 3.

DPs 5, 6 and 7 relate directly to core military requirements and will inform the location and volume of airspace required; clarity on live or simulated weapon capability would be welcomed. DP 7 refers to electromagnetic environments, and we would like to understand if this refers to the EWTR at RAF Spadeadam and whether the airspace solution would include the geographic dimensions of the EWTR, or if this would be utilised in addition to the Future Combat Airspace. We would also like to understand if the cumulative impact of having the EWTR at RAF Spadeadam concurrently active with any newly proposed airspace, associated with this ACP will be considered during the design option stage.

We expect the comments raised above to form the basis of our engagement with the MOD during Stage 2. NIA wishes to formally record that after Safety, NIA's main concern is to ensure that any potential changes to the airspace will have a minimal impact on NIA operations.

My staff remain ready to continue the engagement with the MOD throughout the development of the design principles at Step 1B, and in the development of the Design Options during Stage 2.

Yours sincerely

██████████ DIRECTOR OF OPERATION

**From:** air-airspacetrial@mod.gov.uk

**Date:** 16 Aug 21

**To:** ██████████

Hi ██████████,

Thanks for your response and that from ██████████. I have read your feedback from previous requests and try to answer some of your concerns now, I apologise for not sending a response sooner and please be assured that I will try my best to give you feedback throughout this process, however once stage 3 is reached much of this will be via the Airspace Change portal to ensure transparency.

I have spoken to my opposite number at the Air and Space Warfare Centre this morning, Sqn Ldr ██████████, you have probably had correspondence with him as he is the change sponsor for the airspace trial. It is our intention to have a face to face meeting with you or your representatives on completion of Ex Cobra Warrior 21-2 so late September or October. At this meeting it is planned to take feedback from the trial, plan for the next activation in March and also engage for this ACP for the permanent change and another ACP I will be sponsoring for another activation in September 2022.

Your feedback resulted in changes to the Design Principles which were uploaded to the portal, I have copied them below.

Priority	Design Principle
1	DP(a) The airspace design must be safe, with any hazards identified and risks mitigated such that they are as low as reasonably practicable and tolerable.
2	DP(c) Optimise the airspace design to accommodate periodic large-scale multi-domain collective training activities.  DP(e) Minimise impact on other airspace users and the network.
3	DP(h) Minimise the impact to Commercial Air Traffic flow, sector complexity and sector capacity.  DP(g) Minimise environmental impacts including CO2 emissions.  DP(f) Minimise environmental impacts including noise (where relevant).
4	DP(d) Optimise Airspace Management (ASM) applying Flexible Use of Airspace (FUA) principles and ASM Policy.  DP(b) The training area will be within efficient reach of RAF / United States Air Force (Europe) (USAFE) Main Operating Bases.
5	DP(j) Minimise complexity in flight planning.  DP(i) Optimise protocols for deconfliction of simultaneous activations of multiple volumes of Special Use Airspace.  DP(k) Maximise the incorporation of results of the MOD's supporting Airspace trial – ACP-2020-042.

With regards to the cadence of activations, it is expected that there will be 2 major exercises per annum, with up to 9 activations per exercise lasting up to 3 hrs. In addition it is predicted that there will be 6 smaller exercises throughout the year, (2 in the months of February, June and November) with 3 activations per exercise. These activations amount to just over 100 hours per annum. However I must stress that these are current expected levels and to promise future levels would be disingenuous of me.

Answers or further evidence to your concerns regarding fast jet activity and increased noise will hopefully be gathered during the September activation and can be discussed at a future meeting.

With regards to the CAP 1616 process I think that with some of the questions asked during stage 1 we were getting ahead of the process in that the aim of this stage is for the change sponsor to understand the Design Principles which are of importance to the stakeholder, with further detail being added as the options are developed during stage 2 and during the consultation in stage 3.

Please rest assured that although all of your questions may not yet have been answered, the CAP 1616 process will ensure that all stakeholders will have the opportunity to raise, and have answered with full transparency, any concerns with the CAA being the arbiters of whether the requirements for each stage have been met.

Kind Regards,

Mike

Sqn Ldr M I Parker MCGI RAF | SO2 A7 Training Enablers | HQ 11 Gp | Air Command | Hurricane Block | RAF High Wycombe | Walters Ash | Bucks | HP14 4UE | Skype: 03001 641013 | Email: [REDACTED]

British Gliding Association/Borders Gliding Club

**From:** [REDACTED]  
**Date:** 18 Aug 21  
**To:** [air-airspacetrail@mod.gov.uk](mailto:air-airspacetrail@mod.gov.uk)

Mike

I held back until we heard from the local stakeholder, ie Borders GC represented here by [REDACTED].

The BGA echo's [REDACTED] comments in that minimum activation that follows reasonable prior warning, ie that allows gliding event planning, is the way forward. It's particularly important that those arrangements are included within the SUA proposal and established in an agreed written protocol going forward.

Kind regards

[REDACTED]

**From:** [REDACTED]  
**Sent:** 18 August 2021 12:28  
**To:** 'Air-AirspaceTrial (MULTIUSER)' <[Air-AirspaceTrial@mod.gov.uk](mailto:Air-AirspaceTrial@mod.gov.uk)>  
**Cc:** [REDACTED]  
**Subject:** RE: ACP-2020-026

Good Afternoon [REDACTED],

We had an arrangement with [REDACTED] at the Air Warfare Centre that he would inform us of any major exercises that were planned in our area of operations (Northumberland) as soon as the dates were known. Last year he informed us in early December about the 2 x COBRA WARRIOR exercises that were planned for 2021. That gave us adequate warning to plan our activities for this year and to inform our visitors who need to book accommodation etc.

We offer expedition weeks for pilots from around the country who wish to enjoy the mountain wave flying that tends to be prevalent in our area at certain times of time of year – particularly the autumn. In the right conditions, gliders operating from Milfield can reach heights of over 20,000' so it is important that we have the freedom of airspace for these events. It is not uncommon for the Borders Gliding Club to host up to 40 visiting pilots and their aircraft in each of these weeks so we must continue to ensure that the airspace is available for them to use. We therefore request that this method of deconfliction continues in the future.



Kind regards,

[REDACTED]

Military Liaison & Airspace Officer

Borders Gliding Club

Milfield

Tel: [REDACTED]

**From:** Air-AirspaceTrial (MULTIUSER) [<mailto:Air-AirspaceTrial@mod.gov.uk>]

**Sent:** 12 August 2021 13:47

**To:** [REDACTED]

**Subject:** ACP-2020-026

Good afternoon gentlemen,

Thankyou for your feedback to the ACP-2020-026. I hope you don't mind me emailing you both together. In response, I would like to stress that although this ACP is for a permanent change, the resulting SUA would only be active for large scale military exercises. Whilst it is impossible to forecast how often this would be in the long-term, based upon the current exercise schedule this amounts to between 100-200 hours per year split between 2 major exercises and a number of smaller ones.

Activation would be through the normal routes using the Military Airspace Management Cell.

For my own awareness, please can you tell me how and how far in advance you find out about the air activity which affects you?

I am really keen to engage with all airspace users to find a solution and once I have collated all responses I am keen to visit in order to fully understand the issues rather than just communicate via email. Let me know if you think this would be beneficial.

Many thanks

*Mike*

**Sqn Ldr M I Parker MCGI RAF** | SO2 A7 Training Enablers | HQ 11 Gp | Air Command | Hurricane Block | RAF High Wycombe | Walters Ash | Bucks | HP14 4UE | **Skype:** 03001 641013 | **Email:** [REDACTED]

Leuchars Diversion Airfield

**From:** [REDACTED]

**Date:** 12 Aug 21

To: air-airspacetrials@mod.gov.uk

Sir,

As requested, hope this addresses your questions:

- As QRA(I) generally fly direct to/from the target area, I would expect that they have priority through the exercise airspace. Ideally this would be conducted in a controlled manner via a co-ordination with whoever has overall control of the active exercise. However, the most likely scenario is a QRA(I) aircraft diverting in to LDA. The issue of transit through exercise airspace then is in the hands of Hotspur or Swanwick (Mil). They would have to initiate the co-ordination before the handover to Leuchars. With routine non-exercise traffic we would avoid the entire exercise area.
- When active, the airspace causes choke points to the north, west and especially the south, between Leuchars and Controlled Airspace (P600, Scottish TMA etc) for traffic operating above FL85. This then severely limits our vectoring options for IFR recoveries/departures to/from both Leuchars (Rwy 26 & 08 IAFs 16 nm east of Leuchars) and Dundee (Rwy 27 IAFs 15 nm east of Dundee & 5 nm east of Leuchars). Clearly a FJ departing Leuchars southeast bound for example would not wish to stay at FL 80 until passing Newcastle. Also, given the bandboxed radar position at Leuchars (App, Deps, LARS & Zone all from the one position), Controller workload increases and capacity reduces.
- I observed several packages of aircraft spilling out of the exercise area and some below FL85. Fortunately no impact on aircraft we were working at the time.

Overall, we accept that the chances of the QRA(I) scenario occurring are low but it should be considered. Likewise the impact on IFR traffic operating above FL85.

Regards

[Redacted]

[Redacted] | ATCO | Air Traffic Control Leuchars Airfield | Leuchars Station | Fife  
KY16 0JX | Mil: 95151 Ext 7851 | [Redacted]

E-Mail: [Redacted]

**From:** Parker, Michael Sqn Ldr (Air-11Gp-A7 TrgEnablers1 SO2) <Michael.Parker575@mod.gov.uk>

**Sent:** 12 August 2021 12:43

**To:** [Redacted]

**Subject:** RE: 20210811-ACP-2020-026

[Redacted]

Thanks for your reply, I am only the sponsor for ACP-2020-026, the permanent change with no input into either the trial or the next iteration which is a TDA for CW21-2. I include you as a stakeholder for this ACP and am interested in your feedback which will be considered.

Please could you expand on the points you make in your email? My notes in green. I would like to stress that although this ACP is for a permanent change, the SUA would only be activated for large scale exercises and not permanently active.

- Impact on QRA(I) Ops, should they opt to recover/depart from LDA when the area is active. Our main output is to support DT1. **What is the impact? What would you normally do if Q needed to cross segregated airspace?**
- Choke points that will occur around Leuchars/Controlled Airspace for traffic wishing to operate above FL85. **Where are the choke points? What traffic does it affect? What is the impact?**
- As happened during the Trial, aircraft wandering outside the exercise area, subsequently affecting the choke points. **How often did it happen, what did you do about it and how did it affect the choke points?**

Many thanks,

*Mike*

**Sqn Ldr M I Parker MCGI RAF** | SO2 A7 Training Enablers | HQ 11 Gp | Air Command | Hurricane Block | RAF High Wycombe | Walters Ash | Bucks | HP14 4UE | **Skype:** 03001 641013 | **Email:** [REDACTED]

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

**From:** [REDACTED]  
**Sent:** 12 August 2021 12:15  
**To:** Parker, Michael Sqn Ldr (Air-11Gp-A7 TrgEnablers1 SO2) <Michael.Parker575@mod.gov.uk>  
**Cc:** [REDACTED]  
**Subject:** RE: 20210811-ACP-2020-026

Afternoon Sir,

I'm replying on behalf of SATCO, Leuchars Diversion Airfield (LDA).

We weren't invited to send any feedback for the Trial earlier this year. Returns have only been for the Stakeholder Engagement stages (Trial Airspace Proposal Design Engagement Response & Options Development).

I did observe the Trial when the area was active. With the base level of FL85, the impact on our Ops was minimal. Our main concerns are as follows:

- Impact on QRA(I) Ops, should they opt to recover/depart from LDA when the area is active. Our main output is to support DT1.
- Choke points that will occur around Leuchars/Controlled Airspace for traffic wishing to operate above FL85.
- As happened during the Trial, aircraft wandering outside the exercise area, subsequently affecting the choke points.

We would welcome the chance to give some feedback on future Trials.

Regards

[REDACTED]

[REDACTED] | ATCO | Air Traffic Control Leuchars Airfield | Leuchars Station | Fife  
KY16 0JX | [REDACTED]

E-Mail: [REDACTED]

RAF 1 Group

**From:** [REDACTED]

**Date:**

**To:** air-airspacetrail@mod.gov.uk

13 Aug 21

### **1 Gp Response to ACP 2020 Review**

#### **CA FHQ:**

Do the options align with design principles?

- Yes, Option 3 would be the preferred option for CAF.

How would implementation impact on your operations?

- This would improve LFE/COMAO trg and not hinder other UK trg fg more than the current ways of working. Distance to airspace will mean Ltng will likely need to rely on AR to carry out meaningful vults at that range.

Do any of the options affect your traffic below 7000ft?

- Most training / operational activity for Combat Air occurs above 10000ft. Not having airspace segregated below presents only a marginal increased safety risk in the areas out to sea for low level intercepts etc. For the overland portions, there is some increased risk if descending below weather (CAS, for eg) but this new airspace does not increase the risk above current ops. Presumably there would be a NOTAM associated with activation of the airspace highlighting operations from the surface upwards for Helo players etc.

Any other comments?

- This would be a marked improvement on current LFE trg ACPs. The document mentions additional fillets of airspace for tac admin and AAR (Option3), which would be desirable, though not essential, to increase overall fighting airspace. As stated in the document, the 323 complex should not be activated in conjunction with this airspace as transit times would be unworkable.

## ISTAR FHQ:

- **RJ** - wish to confirm the impact to extant AAR tracks.
- **Poseidon** - Assuming D809 remains for REXTORPs etc, then nil impact on Poseidon.
- **Shadow** - Potential impact on Shadow trg from these proposals. I would look to monitor the growth of the special use airspace as roughly outlined in Fig 4. On first look, it starts to encroach on Class-G airspace around NE Lincolnshire and E Yorkshire, however the graphic is of poor quality so it is impossible to be accurate.
  - These areas are important to Shadow as many Sqn training NAIs are within this area. 14 Sqn currently aim to operate between FL100 and FL160 (for tactical reasons); being below FL145 keeps operations clear of the current overland portions of D323.

## Further Shadow observations

### *Assumptions:*

- *Exercise airspace stand up will be confined to the duration of Large Flying Exercises (LFEs) iaw the Air A7 LFE Synch Matrix. These LFEs will be at the same frequency as things are currently (e.g. COBRA WARRIOR/JOINT WARRIOR etc).*
- *During these LFEs, it is assumed there will be no extra Exs conducted in the Class G airspace of the Vale of York/Norfolk by USAF/RAF units.*

*If these assumptions are incorrect, some of follow on observations become invalid.*

- *Option 1/Figure 6 would have limited impact on our day to day training during these LFEs. Class G airspace in the Vale of York, Lincolnshire and Norfolk will still be accessible for our own training. These are usually our preferred areas to operate as we do not require a SFN (minimises our impact on Civil ATC) and offers maximum return given short transit times to these areas from RAF Waddington. If the weather were unsuitable in these areas for EO sensor employment, the Shawbury triangle and Yeovilton areas of Class G airspace are no more than an hour away. If this airspace were stood up, it would impact our ability to transit up to Scotland outside of controlled airspace. This could be mitigated by aircraft submitting a flight plan to get round the airspace construct (e.g. joining at NATEB) or potentially flying underneath the airspace depending on its base. This option clearly*

*offers the best proposed solution iaw the design philosophy.*

- *Option 2/Figure 7 is less restrictive than Option 1. The points raised for Option 1 are still broadly valid for this airspace however.*
- *Option 3 is again broadly similar to Option 1. The additional Air to Air Refuelling Area (AARA) to the East has almost nil impact on routine Shadow operations. The northern AARA would not routinely impact on Shadow operations however, based on my limited knowledge of AARA design, looks unworkable at the East end as it is too narrow and a tanker would struggle to remain inside it whilst on towline.*
- *Shadow does not routinely operate below FL100 for a number of reasons. In extremis however we can operate down to approx. FL50 if constrained by weather. This is not a frequent occurrence however it must be mentioned given the question posed on pg. 15.*
- *Up until this point I have answered given my initial two assumptions. In the whole time I have been on 14 Shadow (approx. 5 years), the Air/A7 LFE Synchronisation Matrix has CONSISTENTLY failed to deconflict Ex CHAMELEON xx/02 and the respective second Ex COBRA/CRIMSON WARRIOR of the year. These are usually run concurrently in Aug/Sep of every year. Ex CHAMELEON, notwithstanding COVID-19, is usually run outside of the U.K. wherever possible. This is not always practicable and when the 2 Exs run simultaneously in the U.K. there have been problems previously. I can only see this getting worse with these new airspace constructs. One of the main problems is the proximity of both RAF Leeming and RAF Leuchars to the new airspace construct. There are now very few RAF bases which can accommodate large numbers of visiting aircraft given the number of bases which have closed over the last few years, the lack of ATC services between 1700 and 0900L during the week/and generally over the weekend and the lack of apron space/accommodation at many MOBs. Better deconfliction between Air A7 and MAB Air LOs would potentially mitigate this problem.*

## **RPAS:**

Do the options presented align with the design principles?

- Yes, the options presented appear to align with the design principles.

How would the implementation of the options impact on your operation?

- The integration of Protector into UK Airspace is in the development phases at the moment and as such it is hard to give a definitive answer on this. An area of concern is the suppression of the 323's (mentioned on page 11) when the new airspace is active - current planning is looking at Protector utilising the 323's on departure from Waddington and suppressing the 323's would

therefore impact operations.

- Due to the overlap between this ACP and the Protector ACP there needs to be further discussion on deconfliction. Request an internal discussion between the sponsor and Dr Peter Downer (RPAS UK Airspace Integration Lead) to ensure that the two separate ACPs do not present confusion when presented to the CAA.

Do any of the options affect your traffic pattern below 7000'?

- May affect Protector at FOC (when fitted with a complete certified DAA system).

Do you have any other comments?

- Pre-FOC Protector may not be able to get to this airspace, however this falls into a wider discussion with the Airspace DLOD about accessing Danger Areas (current work).

## **ASWC**

The ASWC has reviewed the ACP proposal and are content.

- From our perspective the options align with the design principles.
- The implementation would support our operation allowing better collective trg and trials airspace.
- The options do not affect our traffic pattern below 7000'

6 Flying Training School

**From:** [REDACTED]

**Date:** 11 Aug 21

**To:** air-airspacetrail@mod.gov.uk

Mike,

1. HQ 6 FTS have little to add to that previously submitted indicating that ESUAS/UGSAS are stakeholders as their operations might be affected.
2. Please see immediately below a consolidated, short summary with OC UGSAS as lead for the combine:

Given that the restrictions are FL 85 and above and when active Sectors 1 and 2 at ESUAS would still be available I see little impact.

Ideally the airspace should be available for Tutor use when not active in order to mitigate any impact on the Scottish UASs operations.

3. Ahead of your deadline on 13 Aug 21, please do not hesitate to contact me directly if you require additional detail.

Sincere Regards

[REDACTED]

[REDACTED] | SO2 Flying HQ 6 FTS | Aircraft Hall | RAFC Cranwell Sleaford Lincs NG34  
8HB | [REDACTED]

6 FTS will deliver its mission to attract talent to Regular and Reserve RAF service, and educate selected undergraduates on the role of Air & Space Power in delivering the nation's defence

## General Aviation Alliance

**From:** [REDACTED]

**Date:** 9 Sep 21

**To:** air-airspacetrial@mod.gov.uk

Hi Mike,

Thank you for the extended time opportunity to comment.

1. We cannot find anything in the documents as to time elements for any of the options:
  - a. Would the DA be permanent or activated by NOTAM?  
We suggest that activation by NOTAM would best meet the Design principles.
  - b. If activated by NOTAM what would be the minimum time between the NOTAM and the activation?  
We suggest that it needs to be at very least 24 hours between the NOTAM and the airspace being activated, and preferably more like 7 days, to best meet the Design principles.
  - c. For how many days per year is it envisaged that the DA would be in use?  
We suggest that this data needs to be broken down into weekends/Bank Holidays and mid-week days.

Whilst the impacts of the ACP-2020-042 trial were low on GA we believe that the data highlighted above is important to our understanding of potential impacts.

2. Maybe more for the Stage 3 consultation but what happens to displaced civil traffic, e.g. from airway P18, and what are its impacts upon where it is displaced to?
3. We are surprised at the lack of input to ACP-2020-042 from some of the main and regular users of that airspace in normal times, e.g. Eastern Airways and British Airways?  
We believe that because of the extremely unusual conditions that the ACP-2020-042 trial took place in that increased efforts should be made to engage with those that it is know usually operate in this airspace.

Regards

[REDACTED]



[REDACTED]  
Programme Manager

General Aviation Alliance

Email: [REDACTED]

**From:** [air-airspacetrial@mod.gov.uk](mailto:air-airspacetrial@mod.gov.uk)

**Date:** 9 Sep 21

**To:** [REDACTED]

Good morning Tom and thanks for sending me your feedback so quickly, I will include it in the stage 2 submission, documents will be uploaded to the portal by the end of tomorrow. You raise some pertinent questions which I aim to answer fully during stage 3. Although I do have some answers, see below.

1. We cannot find anything in the documents as to time elements for any of the options:
  - a. Would the DA be permanent or activated by NOTAM?  
We suggest that activation by NOTAM would best meet the Design principles. [Yes, it would be activated by NOTAM.](#)
  - b. If activated by NOTAM what would be the minimum time between the NOTAM and the activation?  
We suggest that it needs to be at very least 24 hours between the NOTAM and the airspace being activated, and preferably more like 7 days, to best meet the Design principles. [I anticipate the minimum time between NOTAM and activation being 24 hours but understand that this doesn't help the planning for many GA stakeholders. During stage 3 we will investigate implementing an agreed notice period.](#)
  - c. For how many days per year is it envisaged that the DA would be in use?  
We suggest that this data needs to be broken down into weekends/Bank Holidays and mid-week days. [For the main bi-annual large scale RAF exercise we anticipate activations in March and September. During these exercises we nominally expect 9 activations of 3 hours, during daylight hours. In addition there are expected to be 6 activations of 3 hours in each of Feb, June and November. This is, of course based on current forecasts and is subject to change.](#)

Whilst the impacts of the ACP-2020-042 trial were low on GA we believe that the data highlighted above is important to our understanding of potential impacts.

2. Maybe more for the Stage 3 consultation but what happens to displaced civil traffic, e.g. from airway P18, and what are its impacts upon where it is displaced to? [For the temporary activation this month and in March, new reporting points have been introduced and promulgated. We will work with NATS to implement FBZ, reporting points and DCTs.](#)
3. We are surprised at the lack of input to ACP-2020-042 from some of the main and regular users of that airspace in normal times, e.g. Eastern Airways and British Airways? We believe that because of the extremely unusual conditions that the ACP-2020-042 trial took place in that increased efforts should be made to engage with those that it is know usually operate in this airspace. [ACP-2021-007 is in progress; this is activation of TDA D597, the same portion of airspace which was used in trial ACP-202-042. The SUP is at \[this link\]\(#\) and outlines the processes which have been implemented. I will be working closely with the sponsor for that ACP to ensure feedback from the temp activations are incorporated into the permanent change.](#)

I hope the answers are informative and I look forward to working with you during this process. I have also just started ACP-2021-048 which is for a further activation of a TDA to bridge the gap between ACP-2021-007 and ACP-2020-026; I will be in touch . . .

Best wishes,

*Mike*

**Sqn Ldr M I Parker MCGI RAF** | SO2 A7 Training Enablers | HQ 11 Gp | Air Command | Hurricane Block | RAF High Wycombe | Walters Ash | Bucks | HP14 4UE | **Skype:** 03001 641013 | **Email:** [REDACTED]

### **Teams meeting between Mod and NATS 25 Nov 2021**

Record of Teams meeting with NATS representatives on 25<sup>th</sup> November 2021. The RFI was articulated as “please could you or one of your colleagues please provide me with details about which airports/routes would be affected (I’m anticipating Teesside/Newcastle)? It would be useful to know which routes travel through this area, how frequently they are used and whether there are alternatives should the proposed SUA be active.

In addition, please can you provide details about how FRA will affect and might be affected by the proposal?”

**Present –** [REDACTED] Airspace Development Consultant  
[REDACTED] ATM development Military Interface Lead  
[REDACTED] ACP Sponsor

The sponsor began by explaining that the ACP was still at Stage 2 and further engagement was required in order to understand the potential impacts of the SUA being positioned in the proposed location and their opinion on how it aligned with the DPs.

The airspace consultant understood the need for the SUA and agreed that the geographical location proposed was the most suitable location as long as ACMs were agreed. He went on to explain that the portion of airspace designed for ACP-2021-007 (EG TDA 597) fulfilled the following:

- Offered the required airspace over Northumbria to accommodate real time training and allow for the placement of emitters to represent threats.
- It did not infringe upon existing lower airspace structures i.e. the ScTMA and Newcastle CTA as well as CTAs that link to them.
- It minimised impact to Newcastle which is further mitigated by Mil ATS provision to traffic via the Copenhagen FIR
- It minimised impact to Aberdeen by allowing connection via RUGID
- Allowed for continued access to the ScTMA via P600 for traffic via the Norwegian and Copenhagen FIRs
- It was of sufficient size to wholly contain activity
- It allowed for the Oceanic westbound flow to continue un-impinged

- It allowed for connection to the Manchester and Midland Group airfields as well as Dublin via UL975 to be used instead of routings via NATEB
- It allowed for London group arrivals and departures as well as overflights and Manchester and Midland Group airfields as well as Dublin via P5 to be utilised; this is instead of routings required via NATEB
- These aspects are delivered by the agreement to prioritise activation of 597 over other DAs to allow the impacts to be minimised.

NATS were of the opinion that data gathered from trial and activations should be the primary source of data for this proposal. To do otherwise dismisses the evidence gathered as part of the trial process.

With regards to FRA, the design, which was approved by the ATM inspector, for D597 took FRA into account. Some routes would still be unusable however additional waypoints, specifically OFCOT were introduced as an “anchor” point to provide alternate routes.

NATS state that the design for a TDA has been completed, it has been trialled successfully and would be their preferred option for the permanent solution.

#### **Face to face meeting between MoD and Newcastle Airport – 3<sup>rd</sup> December 2021**

**Present :** [REDACTED] – SO1 Training Enablers  
 [REDACTED] – Air and Space Warfare Centre  
 [REDACTED] – SO2 Training Enablers

[REDACTED] – Newcastle International Airport (NIA) Chief Operating Officer

[REDACTED] – NIA Director of Operations  
 [REDACTED] – NIA ATC Manager

Representatives from MoD travelled to Newcastle Airport and held a C-19 compliant meeting with key personnel from Newcastle. It is recognised by the sponsor that NIA is the most affected stakeholder in this ACP and the building of strong professional relationships is of utmost importance.

NIA used some slides to highlight their concerns, these will be uploaded to the ACP portal, however the key points from the meeting are below.

NIA is a busy airport and is key to the economic success of the region. It is twice as busy during the summer than in winter with up to 18 departures in 90 minutes on busy mornings. Their operators are commercial airlines who plan their routes month in advance and have been concerned by the assertion in a draft LOA for EG TDA 597 that the SUA could be activated at an hours notice. A letter from Jet2 was also shared with the sponsor and will be uploaded to the portal along with the sponsor’s response to NIA.

<b>Newcastle question/concern</b>	<b>MoD response</b>
Commercial airlines require certainty and not flexibility. How much notice will be given for activations?	<p>MoD responded that notionally, for the type of exercises this SUA is being proposed for, 6 months notice is achievable to provide a date, 3 months notice could be given of the time of day. A corresponding LoA would be considered detailing required notification timelines.</p> <p>MoD offered flexibility and will attempt to avoid peak traffic times in order to minimise disruption to NIA and their customers.</p>
A host of routes could be affected by the proposal which would result in higher fuel burn and CO2 emissions.	As part of Stage 3, MoD will commission a study to determine the extra fuel and CO2 emissions caused as a result of aircraft having to change route to avoid the proposed SUA.
NIA requested clarification on the activation of other MDAs and were concerned that correct protocols for activation and cancellation would not be followed.	The proposal would plan for other MDAs to be unavailable during activations of this SUA. Those operators guilty of applying incorrect booking protocols (ie failing to cancel bookings when not required) would be identified and re-briefed.
When active, the SUA would potentially close a number of routes. The ACP proposes that 78 Sqn could be used to provide an ATS between NIA and the recognised ATS route. NIA have evidence that derogated services provided by 78 Sqn are not available on many days.	The sponsor will investigate the issue with the service provided by 78 Sqn and strive to propose a solution which guarantees a service for traffic affected directly by the activation of the proposed SUA.
NIA asked for clarification over the use of RAF Spadeadam EWR and whether exercise participants would operate outside of the proposed SUA.	It was explained that Spadeadam is likely to be used concurrently by fast jet and rotary wing traffic therefore there is likely to be transit traffic routing between the proposed SUA and Spadeadam. Although all high energy manoeuvres would be contained within the proposed SUA there is a possibility that heavy aircraft (air to air refuelling or ISR) may set up orbits in the adjacent Class G or C.
NIA asked about entry and exit points to the proposed SUA and how it might affect their traffic.	MoD proposed recognised and published entry and exit points and levels and proposed to include a condition that exercise traffic hold a minimum of Bingo fuel +5 minutes so

	that they could hold if required to avoid NIA traffic.
NIA shared a letter detailing Jet2's concerns.	MoD proposed to brief those airlines who request consultation.
Some terms used in the proposal are unclear to non-military stakeholders.	Sponsor will compose a glossary of abbreviations and terms used within the ACP and publish on the portal and on any future documentation.