

Initial Email Engagement

20220411-ACP-2020-092 Stage 2 Engagement



Air-FastJetAreasProposal (MULTIUSER) <Air-FastJetAreasProposal@mod.gov.uk>

To [Redacted]

Cc [Redacted]

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Mon 11/04/2022 13:32

You forwarded this message on 12/04/2022 09:58.

20220411-ACP-2020-092 Stage 2A Options Development.pdf
675 KB

Dear aviation stakeholders,

Thank you for your input during Stage 1 of 'ACP-2020-092 - Inclusion of FJAs into UK AIP'. 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 looked at 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 (Step 2A of Stage 2) is attached to this email. This explains the proposal in detail. Please take time to consider the proposal and complete the questionnaire in Annex A of the attached document. Alternatively, please feel free to reply directly to this email address with any questions, concerns or feedback.

Responses are requested no later than Monday 9th May please, in order to meet the agreed timeline. If you feel you might need a longer consultation period, please let myself know, via the email above, as soon as you can.

Kind regards,





Stuart

[Redacted] | SO3 BATTLESPACE MANAGEMENT | JOINT TRAINING AND EXERCISE PLANNING STAFF - JTEPS | NORTHWOOD HQ | SANDY LANE | NORTHWOOD | HA6 3HP | Air-FastJetAreasProposal@mod.gov.uk


Responses

DAAM (MoD)

RE: 20220411-ACP-2020-092 Stage 2 Engagement

  (Air-2GpBMFHQ-STANEVAL OC)
To  (MULTIUSER)
Cc  (Air-2GpSpBM-DAAMRanges SO3)


Green Category

 You replied to this message on 12/04/2022 11:52.

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Tue 12/04/2022 11:10

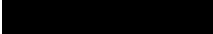
Morning Stuart,

On behalf of  2Gp BM Fce HQ DAAM & BM Assurance SO1.

We are content with the proposal and design of the FJAs and have no additional comments.

Regards,







 | OC BM STANEVAL | RAF Shawbury | Shrewsbury | Shropshire | SY4 4DZ | Phone:  | Mobile:  | Skype [Click Here](#) |

[BM STANEVAL Sharepoint Site](#)




British Gliding Association

20220411-ACP-2020-092 Stage 2 Engagement



To  Air-FastJetAreasProposal (MULTIUSER)
Cc 

 Reply  Reply All  Forward 

Tue 12/04/2022 12:15

 Follow up. Completed on 02 May 2022.
You replied to this message on 02/05/2022 11:25.

Dear MoD

This response is submitted on behalf of the British Gliding Association. The British Gliding Association (BGA) is the governing body of sport gliding in the UK and represents the interests of some 6500 members of the UK's 78 gliding clubs including the operators of some 2200 sailplanes.

The BGA understands and supports the need for adequate military fast jet training areas. Being above FL245, the proposed areas will not have a major impact on gliding, but gliding is an aspirational sport whereby when a rare opportunity presents itself, eg the ability to climb above FL245, it is damaging to the sport if this is unnecessarily prevented. There is a small but steady increase in gliders in Scotland being fitted with SSR, and one of the justifications is that this allows VFR flight above FL195 outside of activated TRA(G)s.

On page 11 of the Options Development document is the statement "Our proposal is for two permanent segregated volumes of airspace". Presumably the word "permanent" means they would be permanently active? If so we think this is unreasonable. It would be quite reasonable for them to be activated by NOTAM eg for the duration of Joint Warrior, and on other occasions when the airspace will actually be used. But in our opinion it is neither reasonable nor within the concepts of CAA's Airspace Modernisation Strategy and in particular Flexible Use of Airspace, to retain this airspace as segregated when MoD is not actually using it.

We therefore propose to amend Option 1 to state that the airspace will only be segregated when activated by NOTAM and this will only be when the airspace is planned to be used by MoD.

Kind Regards



for British Gliding Association

RE: 20220411-ACP-2020-092 Stage 2 Engagement



Air-FastJetAreasProposal (MULTIUSER)

To [REDACTED]
Cc [REDACTED]

[↩ Reply](#) [↩ Reply All](#) [→ Forward](#) [⋮](#)

Mon 02/05/2022 11:27

Good morning [REDACTED]

Thank you for your correspondence.

"On page 11 of the Options Development document is the statement "Our proposal is for two permanent segregated volumes of airspace". Presumably the word "permanent" means they would be permanently active?"

I'm sorry for the ambiguity, the word permanent in the statement above does not mean they'll be permanently active, but rather the airspace construct will exist permanently. This is to differentiate this ACP from any temporary ACP submission the MoD has ongoing. I totally agree permanently segregated airspace would be totally unreasonable and against FUA policy. I will make sure I clarify this point in my submission to the CAA.

Our intention on how we will activate the airspace will be the same process as Managed Danger Areas, which as you suggested, would be via NOTAM for only the duration on when we plan to use the airspace, which will be during specialised serials on Ex Joint Warriors.

I hope you find my response reasonable and I would welcome any other feedback from the BGA.

Kind regards,

Stuart

[REDACTED] | SO3 BATTLESPACE MANAGEMENT | JOINT TRAINING AND EXERCISE PLANNING STAFF - JTEPS | NORTHWOOD HQ | SANDY LANE | NORTHWOOD | HA6 3HP | Air-FastJetAreasProposal@mod.gov.uk

Re: 20220411-ACP-2020-092 Stage 2 Engagement

[REDACTED]
[REDACTED]
To [Air-FastJetAreasProposal \(MULTIUSER\)](#)
Cc [REDACTED]

[↩ Reply](#) [↩ Reply All](#) [→ Forward](#) [⋮](#)

Mon 02/05/2022 20:01

Dear Stuart

Thank you for the clarification. If the intention is only to activate the areas when you plan to use the airspace, then the BGA has no objection to the proposed ACP.

Kind Regards

[REDACTED]

Sent from my iPad

British Helicopter Association

Consultation



To Air-FastJetAreasProposal (MULTIUSER)

[↩ Reply](#) [↩ Reply All](#) [→ Forward](#) [⋮](#)

Tue 12/04/2022 12:48

Dear Sir

The BHA has no comment on the Option, and it will have no effect on rotary operations.

Yours

Chief Executive
British Helicopter Association
Unit C2
Fairoaks Airport
Chobham
Surrey. GU24 8HU

Office
Mobile
www.britishhelicopterassociation.org

78 Sqn, Swanwick (Mod)

RE: 20220411-ACP-2020-092 Stage 2 Engagement

To Air-FastJetAreasProposal (MULTIUSER)

Green Category

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Thu 14/04/2022 10:33

Stuart,

Response from Military ATC (Area) (78 Sqn, Swanwick):

No issues: as the proposed areas match previous boundaries, which worked satisfactorily from our perspective, we foresee no problems with their effective re-introduction.

Let me know if you need anything else.

| Intelligent Customer/Projects/Airspace | 78 Sqn/Swanwick Mil | Sopwith Way, SOUTHAMPTON, SO31 7AY | DFTS: | PSTN: Email: (MOD)
 (NATSNet)

19 Sqn (MoD)

RE: 20220411-ACP-2020-092 Stage 2 Engagement

[Redacted]
To: Air-FastJetAreasProposal (MULTIUSER)

Reply Reply All Forward ...

Mon 18/04/2022 09:57

Green Category

20220411-ACP-2020-092 Stage 2A Options Development.pdf
769 KB

Morning Stuart,

PSA. No issues from a 19 Sqn perspective.

Warmest Regards,

[Redacted]

[Redacted] OC Assurance | 19 Sqn | RAF Boulmer, Longhoughton, Alnwick, Northumberland, NE66 3JF | Email: [Redacted]



Annex A to Inclusion of FJAs into UK AIP (ACP-2020-092) – Airspace Change Proposal Stage 2A: Engagement

ACP-2020-092 Options Development - Stakeholder Engagement

Name of your organisation:

19 Sqn

Do the options presented align with the design principles?

Yes

How do the options differ from the design principles?

N/A

How would the implementation of the options affect your operation(s)?

No impact to 19 Sqn operations.

Do you have any other comments?

Nil comments

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

Yes

No


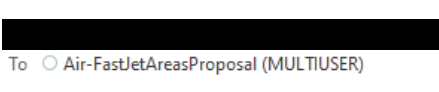
If yes, please provide the change sponsor with your preferred contact method.


NATS (NERL)


RE: 20220411-ACP-2020-092 Stage 2 Engagement - NATS (NERL) Response

[↩ Reply](#) [↩ Reply All](#) [→ Forward](#) [⋮](#)

Fri 06/05/2022 13:24

 
To [Air-FastJetAreasProposal \(MULTIUSER\)](#)

 Follow up. Start by 09 May 2022. Due by 09 May 2022.
You replied to this message on 12/05/2022 10:01.

 NATS consolidated feedback ACP-2020-092 Stage 2A.docx
144 KB

Dear Stuart

Please find attached the NATS (NERL) response.

Kind Regards



NATS



Manager, ATM Portfolio - Design & Benefits

M: 
E: 

www.nats.co.uk



NATS Response to ACP-2020-092 Stage 2 Engagement

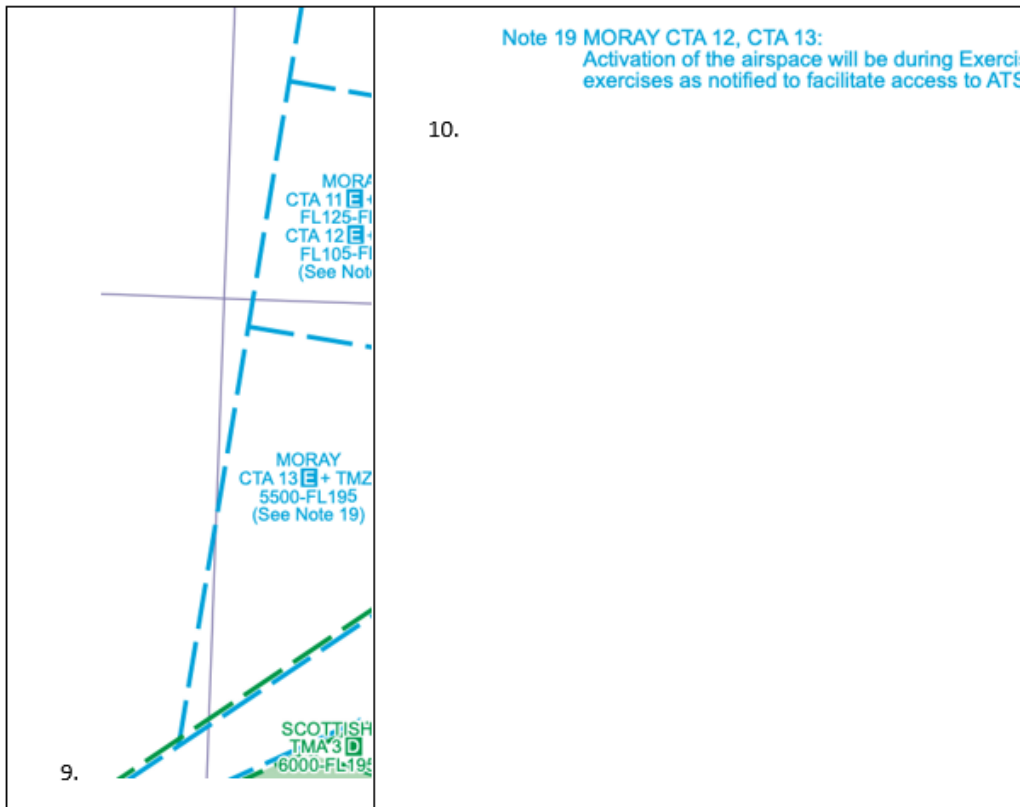
06/05/2022

1. NATS' previous response to MOD ACP-2021-051 relates to the same airspace proposal and pertinent points should be related to this ACP too. Some of these are also repeated here.
2. NATS does not fully recognise the statements made in the Inclusion of Fast Jet Areas (FJAs) into UK AIP in respect of Free Route Airspace. The FJAs have never existed formally as a Special Use Airspace (SUA) construct within UK airspace. Whilst NATS has taken steps to ensure that such areas have been included with the FRA Deployment 1 airspace volume and as a result can be activated, such activation falls outside the normal processes required by the European Network Manager (EU NM). Consequently, the EU NM has requested that any and all SUAs that require circumnavigation by non-participating traffic are included within the State AIP in accordance with ICAO Annex 11 requirements.
3. It is not clear from the document how the MOD will meet ASM and FUA - DP(f) and DP(k). NATS assumes that the required protocols will be established and/or updated in operational agreements to suppress other activations of SUA during EXJW. NATS seeks clarity on this and the extent of proposed deconfliction or whether any other "large airspaces" are also considered. Without this it is not possible to understand the holistic network impact. NATS would seek clear protocols to be defined to consider a broader set of SUA on order to mitigate cumulative impact of concurrent activations of SUA (e.g. FJA North and D613, TDA 597 and D701 F/E/C/Y/G/T/S as well as activation of FJA South and D712, D809 and all segments of D701) to the network and other airspace users.
4. Ultimately, NATS would expect such arrangements to be detailed within an LOA so that both the Civil and Military Airspace Managers within the UK AMC have clarity on the prioritisation of Defence needs balanced against the significant impact that the segregation of such large volumes of airspace have on UK commercial network operations.
5. In accordance with the CAA's [SPECIAL USE AIRSPACE - SAFETY BUFFER POLICY FOR AIRSPACE DESIGN PURPOSES](#) additional requirements for the avoidance of SUA structures is required. This is achieved by the inclusion of a Flight Plan Buffer Zone (FBZ). The size of the FBZ is dependent on the activities being undertaken within the parent SUA and or the measures being undertaken for the avoidance of inadvertent excursion by the SUA operator. This aspect of the airspace design is required to formally introduce new SUAs into UK airspace. The Statement of Need makes reference to FBZs but they are not included in Option 1 so it does not meet DP(j). It is not possible to assess the full impact on the network (and as a result, other airspace users) without the dimensions of the associated FBZ. Additionally, NATS (NERL) would anticipate being

included in the safety management process to ensure that safety barriers applied are sufficient to mitigate the risk to GAT to a tolerable level.

6. NATS will require confirmation of the measures the MOD is seeking to introduce and the requirements for an FBZ or the inclusion of internal operating measures that ensure that inadvertent excursion should not be considered as a factor for these SUAs. It is assumed, but not specified in the document provided, that the following activities will be present: Air Combat or High Energy Manoeuvres; Military Exercise; Supersonic Flight; Pilotless Target Aircraft; UAS (Beyond Visual Line of Sight (BVLOS)).
7. Additionally, NATS would welcome confirmation that the requirements set out in CAP 740 'UK Airspace Management Policy' Appendix C Para 6 will be met in relation to the requirement to 'wholly contain' all activities with the SUA. Additionally, NATS would also welcome sight of the required 'Safety Assessment demonstrating how the hazard will be contained within the TDA' as set out in the CAAs ['Policy for Permanently Established Danger Areas and Temporary Danger Areas' \(Para A.3.1.5d\)](#). This would support DP(a) as a priority DP.
8. As a result of the reclassification of the Class E airway N560 to the MORAY CTA (section 12 & 13) (see diagram below), this element would also need to be captured in the advocated LOA e.g. when active the base level of the CTA is lowered. The lowering of the base level as a consequence of activation of the existing and proposed areas (specifically FJA South and Southeast) was instigated by the CAA following discussions with the British Gliding Association. (Previously it had a permanent lower level.) In short, when FJA South/S-East is active, ScTMA traffic in or outbound from the Oceanic interface via BRUCE (L602) is re-routed to use N560 or N562.

|



Note 19 MORAY CTA 12, CTA 13:
Activation of the airspace will be during Exercise exercises as notified to facilitate access to ATS

11. The option description does not set out how the FJA will be classified – Danger Area, TRA, MTA for example. NATS assumes from the Statement of Need that the proposal is for a Danger Area but this should be clarified in the options.
12. It is difficult to answer some of the engagement questions due to the fact that only one option is presented. NATS is not in a position to provide feedback on DP(b), DP(c), DP(d), DP(e), and assumes that only MOD stakeholders can.

RE: 20220411-ACP-2020-092 Stage 2 Engagement - NATS (NERL) Response



Air-FastJetAreasProposal (MULTIUSER)

To [REDACTED]

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Thu 12/05/2022 10:03

20220511-Change Sponsor response to NATS Feedback_Permanent_ACP.docx
58 KB

20220505-Safety Assessment for ACP-2020-092.docx
19 KB

Good morning [REDACTED]

Thank you very much for your feedback. PSA our response which aims to address all of your concerns. Also attached is the safety statement.

I have used your paragraph numbering in my response to make it easier for everyone to following the conversation.

Kind regards,

Stuart

[REDACTED] SO3 BATTLESPACE MANAGER | JOINT TRAINING AND EXERCISE PLANNING STAFF - JTEPS | NORTHWOOD HQ | SANDY LANE | NORTHWOOD | HA6 3HP | Air-FastJetAreasProposal@mod.gov.uk



Ministry
of Defence

Joint Training and Exercise Planning Staff
Northwood HQ
Sandy Lane
Northwood
HA6 3HP
E-mail: Air-FastJetAreasProposal@mod.gov.uk

12 May 2022

Change Sponsors response to NATS feedback to Stakeholder Engagement ACP-2020-092

2. JTEPS understands and agrees with this point.

3. During Stage 3 of this ACP, a letter of agreement (LOA) will be drafted up to establish protocols to suppress other activations of SUA during times when either FJA is being used. In this LOA, it will state that neither FJA can be activated at the same time at TDA 597 (or what it will eventually be called) and state that FJA(N) and FJA(S) cannot be activated at the same time. It will also contain previous agreed upon protocols within the EG D701 (Hebrides Range) LOA, which states:

"C.1.8 In accordance with MoD policy, the [MAMC] is responsible for ensuring that EG D701E and/or EG D701F activation at or above 29,000ft is not concurrent with EG D712 activation or Military Exercises operating in adjacent Fast Jet Area South (FJAS) or Fast Jet Area North (FJAN). These areas cannot be active at the same time period to allow GAT to transit safely to the east of EG D701E and/or EG D701F."

The final LOA will go further and will be based off information derived from modelling that will assess the operational impact to civilian aviation. It will also be based off advice from the military and civilian AMCs. Your pointers with respect to the airspace that needs to be looked at will also factor in our agreement.

4. As above, a LOA will be produced so that both the Civil and Military Airspace Managers within the UK AMC have clarity on the prioritisation of Defence needs balanced against the significant impact that the segregation of such large volumes of airspace have on UK commercial network operations.

5. The activity being conducted in the FJAs will be, as a minimum, high energy manoeuvres, supersonic flight and UAS BVLOS. We acknowledge these falls within the requirement to have a lateral and vertical buffer. As stated in the 'CAA's SPECIAL USE AIRSPACE - SAFETY BUFFER POLICY FOR AIRSPACE DESIGN PURPOSES' a lateral safety buffer will be established and promulgated in order that the minimum separation between structures will be:

"(i) 5nm from the edge of an airway, TMA, CTA or CTR.

(ii) 10nm from the centreline of Advisory or Upper ATS Routes.

And a vertical buffer is required such that that a minimum separation of 2000ft above or below structures will be maintained."

6. The intended activities that will be conducted within the FJAs for this ACP will be at least: 'High energy Manoeuvres, supersonic flight, UAS BVLOS operations. This will be confirmed during Stage 3 of the ACP.

7. The Safety Assessment is attached separately to this email.

8. Thank you for bringing this to our attention; we will look to introduce a section that states when FJA(S) or FJA(SE) is active the base level of the CTA is lowered. We will look to have a meeting with yourselves to understand this issue better and so that the section in the LOA can be agreed upon.

11. The FJA will be classified as a Danger Area and the intent is for it to be managed by the AMC.

12. Thank you for this feedback. In the documents that will be submitted to the CAA as part of Stage 2, it will be explained why only one option has been presented, which I hope will give you a better understanding. Also, these documents will include analysis on DP(b), DP(c), DP(d) and DP(e) as I appreciate they are all tactical Design Principles.

Change Sponsor

Joint Training and Exercise Planning Staff

Northwood Headquarters

Safety Assessment for Inclusion of FJAs into UK AIP, ACP-2020-092

This section provides a brief, qualitative overview of the impact of this proposal on aviation safety. The evidence feeding into this safety assessment has been obtained from the results of a previous activations of the FJAs. JTEPS have successfully employed several methods in the past to ensure the safety and integrity of the Fast Jet Areas during their use.

Currently, route structures are published and airlines plan to route via ATS routes or flight planned Directs (DCTs). These are deconflicted from active MDAs where necessary using strategic deconfliction methods and published waypoints. The proposal to use this airspace would result in previously tried and tested waypoints. The Chance Sponsor has conducted a Defence Air Safety Occurrence Report (DASOR) search for any safety incidents relating to military aircraft leaving the FJAs during any of the previous activation of the FJAs for the last 7 years, but there have been no reported safety occurrences.

High energy manoeuvres would take place during Ex Joint Warrior, which require segregation from GAT for the protection of both military exercise traffic and civil aviation. In later stages of the design process, the proposal will look to incorporate a flightplan buffer zone (FBZ) to ensure separation in both time and space. The MDA, routings and FBZ should be made known to Eurocontrol for network visibility reducing the risk of any late notice route changes to aircraft in flight.

The dimensions of the airspace for this ACP have been deliberately chosen to be exactly the same as the previous Fast Jet Areas, that we have used during Ex Joint Warrior for over ten years, thus creating a familiarity of the airspace for both the users, the controllers, NATS and the wider airspace community. Because of this familiarity, it will increase the capacity of the pilots using the airspace as they will have a greater awareness of the dimensions, reducing their likeliness of accidentally leaving the airspace, reducing the chance of MAC. In addition, ATC agencies (78 Sqn at Swanwick and NATS) are familiar with the airspace and its seasonal activation, reducing the chance of human error and decreasing the chance of MAC. The reduction of the chance of MAC aligns to our highest priority Design Principle, 'The airspace design must be safe, with any hazards identified and risks mitigated such that they are as low as reasonably practicable and tolerable.'

The FJAs were deliberately constructed to be uncomplex and this proposal has the same attribute. Both airspaces are of a linear shape necessary for efficient air-to-air sorties, with the same planned base height of FL 245 and with only the FJA(S) being divided into a sub-section, FJA South-East, with a single line along the line of longitude 0072W. The reduced complexity increases the capacity of the pilots operating in the airspace and the weapons controller / ATC providing a service in that airspace. The uncomplexity reduces the likeliness of a military aircraft accidentally leaving the segregated airspace and reduces the likeliness of GAT entering the airspace, both of which reduces the chance of MAC.

Ex Joint Warrior aims to provide a multi-threat training environment where participants take part in collective training in preparation for deployment as a Combined Joint Task Force. Consequently, the pilots who will be flying in the FJAs are professional aviators, who are Operational Conversion Unit (OCU) qualified and use Ex JW as a workup to real world deployment. A good example of this is from Spring 2021, when after participating on Ex JW211, the UK Carrier Strike Group 21, a British-led naval force (with embarked F-35s) deployed on Operation Fortis, a 28-week deployment around the world. Experienced and professional aviators mitigate some of the likeness of an aircraft accidentally leaving the FJAs during high energy manoeuvres, further reducing the risk of using this airspace.