



Ministry of Defence

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4 October 22

Dear [REDACTED],

Many thanks for your response, received by email on 30 September 2022.

The aim of the feedback request was to ensure continued engagement with stakeholders during temporary activation periods of TDA EGD597 (D597). These temporary activations provided invaluable training opportunities and ensured that combat support forces are correctly prepared to defend our interests in line with Defence Strategy.

Please find below responses to the concerns and statements that you raised by email on 30 September 2022 regarding the activations in August and September 2022. I am disappointed that we did not get the chance to discuss these issues face-to-face when I visited Newcastle International Airport with my colleague, [REDACTED] on 15 September 2022.

To clarify, original questions in bold. Newcastle responses underlined. MOD responses in italic.

Safety - did the airspace itself cause any safety issues or raise any safety concerns?

Yes – the funnelling of traffic through TOWTE and the entrance/exit points from the airspace created a concern over the traffic intensity in this area. It would be advisable for 78 Sqn to accept traffic to all SE routes from NCL thus not creating a bottle neck.

Para 2.12 of the CAA [Operational Assessment \(3\).pdf](#); Future Combat Airspace dated 12 May 22. 'MOD agreement to provide services to those flights in/out Newcastle airport directly affected by the activation of D597; this does not include Newcastle flights that would ordinarily be subject to the existing arrangements for when derogated services are not available; existing measures already provide alternative routings for when derogated services are not available.' Consistent with the CAA guidance the matter of derogated services is a separate issue to that of D597.

- 1) Request. Newcastle International. It is recommended that Newcastle International Airport discuss 'Derogated Service' provision with 78 Sqn and NATS in order to determine a possible way forward (outside the scope of this ACP)**

As per [Stakeholder Engagement \(1\).pdf](#) Newcastle International Airport requested to 29 Squadron that reporting point TOWTE was used in order to provide lateral separation from the Newcastle Control Zone for exercise transit traffic routing from Teesside Airport. Reporting point TOWTE was also suggested as a routing location for all exercise participants routing from the South towards the exercise location. A reverse of this route would occur at exercise end.

- 2) Request. 11 Gp A7 to approach 19/20/78 Sqn regarding any potential safety incidents in the vicinity of TOWTE as part of entry/exit routes and possible airspace saturation. It is suggested that traffic intensity in the vicinity of reporting point TOWTE is monitored for the March 2023 activation to understand airspace capacity.**

Yes – the associated increase in traffic (low level) in the NE created an excessive workload on the NCL LARS task. These aircraft were outside the TDA but associated with the same Ex.

Para 3 of [Stakeholder Engagement \(1\).pdf](#) identifies to Newcastle International Airport an uplift in rotary assets in the vicinity of Newcastle that will support exercise activity. Given that notice was provided to Newcastle on 17 Jan 2022 regarding the exercise we request that.

- 3) Request. Newcastle International to confirm would it be routine practice to increase the number of controllers on watch in order to meet a likely uplift in LARS traffic? Is there a procedure for Newcastle to turn off LARS if controllers are operating Newcastle movements to capacity?**

Yes – The Ex appeared to be not confined to the TDA and some traffic would descend below (accepted Class G) which worried my team in terms of the GA community and gliding as well as LARS provision.

All activations have been subject to NOTAM and have been circulated via [ACP-2021-048 SUP \(2\).pdf](#) (30 Jun 22) any operator in the area should expect greater MOD activity and possibly reassess risk appetite for flying in the vicinity.

[LoA - final signed 18 Jul 22 Redacted \(3\).pdf](#) A.2.8.1 In addition to D597, additional exercise areas are available for activities such as Air-Air Refuelling (AAR), Intelligence, Surveillance, Targeting, & Reconnaissance (ISTAR) aircraft and Rotary Wing aircraft. Where these activities take place below FL245 coordination processes will be conducted with reference to the applicable airspace rules.

D597 provides segregated airspace to perform high energy and dynamic 3D manoeuvres. Traffic laterally outside D597 was likely to be benign heavy traffic such as AAR and ISR which would likely be on predictable tracks at given altitudes.

- 4) Request. Newcastle International to confirm if GA/Gliding Community have made contact in order to express concerns to them regarding TDA activations? 11Gp A7 have written to these communities and have not yet received a response regarding safety concerns for activations in August and September 2022.**

Yes – we suffered a CAS infringement (USAF) although unknown if these were Ex traffic.

USAFE Air Traffic Control Liaison Officer, Host Nation Coordination Cell, RAF Mildenhall contact details have previously been provided to Newcastle International Airport.

- 5) Request. Newcastle International please confirm that an occurrence report was submitted by Newcastle International regarding the infringement (can you please share the details)?**

Operational Impacts - What effect did the activation of the airspace have on your operation?

Ceased the use of the Copenhagen FIR routes from NCL to the NE (CUTEL as an example). This created a longer routing and increased fuel usage and associated CO2 emissions.

We hoped that the best compromise had been reached with Newcastle International and articulated within [LoA - final signed 18 Jul 22 Redacted \(3\).pdf](#) A.3 ATS Provision to Aircraft Operating to and From Newcastle and Teesside. D597 activation periods have been based upon dialogue with Newcastle International Airport as [Timing Engagement.pdf](#)

- 6) **Request. Newcastle International to provide the exacting number of movements that would normally route to/from the COPENHAGEN FIR that were affected by the activation of D597 during the August and September 2022 exercises.**
- 7) **Request. Newcastle International Airport to confirm if revisions are required regarding service provision for COPENHAGEN FIR movements as outlined in signed (18 July 2022) Letter of Agreement.**

Increased workload on already busy ATCOs.

- 8) **Request. Newcastle International to confirm - was this increased workload reported through an Occurrence Report? Can you please provide examples of this increased workload? Was the increase manageable? Did it lead to an overload situation? Was exercise notification to Newcastle sufficient? Does the LoA require amendment?**

Airspace Management - how well did the notification, activation, and management of the airspace work?

Not in line with the LOA – we did not receive confirmation calls at all (although this was not seen as a barrier to operations).

The signed [LoA - final signed 18 Jul 22 Redacted \(3\).pdf](#) does not specify confirmation calls, however a condition of acceptance of the temporary airspace is service provision from 78 Sqn to Newcastle aircraft to and from the Copenhagen FIR – it can therefore be assumed if D597 is active 78 Sqn can provide a service. The intent was for 19 and 20 Sqn (RAF Boulmer) to conduct a liaison call with Newcastle International Airport prior to each execute – this can be investigated if Newcastle deem of value?

- 9) **Request. Newcastle International input required for suggested LoA insert - ‘The CRC will contact Newcastle for the first VUL of the exercise and will back brief Newcastle by exception if there are any changes outside routine exercise parameters. Both agencies are available to contact at any time if required’**

There were large times of no activity yet active airspace.

Can you please confirm how you reached this conclusion? During my visit to Newcastle on 15 Sep 22, the Newcastle Surveillance equipment did not have sufficient coverage to detect aircraft within D597 – yet when we referred to an unassured internet-based system it was clear that the airspace was indeed occupied by a number of platforms. The radar cross section of certain platforms would also likely prevent observation by the Newcastle surveillance system.

When the Ex was canx it could take an excessive period of time to close down – not in line with the FUA principles.

This airspace close down process is driven by the Military Airspace Management Cell and detailed within [LoA - final signed 18 Jul 22 Redacted \(3\).pdf](#) with temporal buffers applied between DAs specified in Paras A.2.2.3 and A.2.3.1 and D597 activity periods to allow GAT to reconfigure to alternating airspace configurations and thus ensure FPL acceptance and safe segregation of airspace structures for military use. Therefore, the MOD believe that they are operating in accordance with FUA principles with a process that is employed for other airspace reservations.

Air Traffic Management - did the handling of military Ex traffic and/or civil traffic in and around D597 cause any issues?

The agreed entrance and exit points were largely ignored by Mil ATCOs thus creating a concern in my team that coordination (and associated workload increase) would be required.

Paragraph 3 of [Stakeholder Engagement \(3\).pdf](#) details how Newcastle International were offered a copy of the Airspace Control Order – it is noted that this offer was declined as there was no requirement for Newcastle to have this ‘additional information.’

10) Request. Newcastle International to suggest alternate reporting point for exercise traffic in order to increase certainty amongst operational Newcastle staff (noting that reporting point TOWTE was previously referenced but possibly congested). Were any safety reports submitted based on levels of concern?

Environment and Noise - did the activation of D597 cause any environmental or noise concerns?

We received a number of noise complaints about Mil traffic (jet and rotary) and directed them to the MoD website although I'm told that no response was ever received by these complaints.

11) Request. Newcastle International to confirm date/time of complaints to enable a follow-up from 11Group, A7 with the Low Flying Cell.

Any other observations about D597?

The PRI put on the TOWTE route should be extended to all SE routes from NCL – this would alleviate the bottleneck of traffic near the edge of the D597 and reduce risk/increase safety.

Para 2.12 of the CAA [Operational Assessment \(3\).pdf](#); Future Combat Airspace dated 12 May 22. ‘MOD agreement to provide services to those flights in/out Newcastle airport directly affected by the activation of D597; this does not include Newcastle flights that would ordinarily be subject to the existing arrangements for when derogated services are not available; existing measures already provide alternative routings for when derogated services are not available.’ Consistent with the CAA guidance the matter of derogated services is a separate issue to that of D597.

I would be keen to know what percentage of the aircraft using D597 was Gen5 fighter as this is the fundamental linchpin to the MOD's need for such a large area. Also, what percentage of the activation time had Gen5 fighters using the TDA?

The statement of need for the Airspace Change is extracted below, whilst fifth generations are indeed mentioned they only form one element of the airspace change proposal.

Air Command, on behalf of the Ministry of Defence, has an obligation to provide relevant tactical collective training to its combat and combat support forces to ensure UK Forces are correctly prepared to defend UK interests in line with the UK Defence Strategy. An appropriate airspace that can safely facilitate exercising large forces of modern and future air platforms, in an efficient and representative combat environment is required to meet this need. With the introduction of 5th generation aircraft into the RAF inventory, larger, rectangular portions of airspace are needed so that crews can participate in realistic training, employing tactics which would be used in a hostile environment. The existing D323 and D613 complexes are suitable for routine flying training, but lack the space required for a full simulated Combat Air Operation involving participants from our NATO allies. These existing areas also lack the overland areas required on which to place targets. The training our aircrew undertake prepares them for the threats they will face in a hostile environment using scenarios which cannot be recreated in a simulator. A combat operation will not be fought in isolation and will always involve co-operation with a partner nation. The larger airspace allows our RAF crews to train with our North Atlantic Treaty Organisation (NATO) partners in large-scale exercises which mimic real-life combat.

Closing Statement

The ACP Sponsor is happy to maintain a dialogue over the matters described in the note received from Newcastle International Airport on 30 Sep 22, ensuring that mitigations for future activations of this airspace are suitable for reducing any risks or impacts that are perceived by all stakeholders.

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Yours sincerely,

