ACP-2020-024

E-7 Wedgetail Operating Areas

STEP 3A

CONSULTATION DOCUMENT

V1.0

Ministry of Defence

Responsible Authors of this Document

The Sponsor for this Airspace Change Proposal is the Ministry of Defence (MoD). The project team is drawn from the ISTAR FHQ.

Position	Name	Role
Project Lead	[redacted]	ISTAR FHQ SO2 E-7
Project Authority	[redacted]	Air Cap Del E-7 PM

Only responsible authors may implement amendments via the Project lead. All revisions will be listed and detailed in the table below.

Revision Number	Affected part	Revised By	Notes
Initial Issue V1.0		Project Lead	

Contents

Glossary of terms

ADQ	Air Data Quality
AEW&C	Airborne Early Warning and Control
ANSP	Air Navigation Service Provider
ASACS	Air Surveillance And Control System
ACP	Airspace Control Proposal
AIP	Aeronautical Information Publication
AIRAC	Aeronautical Information Regulation and Control
CAA	Civilian Aviation Authority
CAP	Civilian Aviation Publication
DAATM	Defence Airspace and Air Traffic Management
FGEN	Force Generation
FHQ	Force Head Quarters
FIR	Flight Information Region
FL	Flight Level
FRA	Free Route Airspace
FUA	Flexible Use of Airspace
GAT	General Air Traffic
ISTAR	Intelligence, Surveillance, Target Acquisition and Reconnaissance
MDA	Managed Danger Area
MESA	Multi-role Electronically Scanned Array
NATO	North Atlantic Treaty Organisation
NATS	National Air Traffic Services
NM	Nautical Mile
NOTAM	Notice To Airmen
MAA	Military Aviation Authority
MDA	Managed Danger Area
MoD	Ministry of Defence
SoN	Statement of Need
UIR	Upper Information Region
UTC	Universal Time Coordinated

Introduction

0.1 This document forms part of Stage 3 of the Airspace Change Proposal ACP-2020-024 and has been prepared in accordance with Civil Aviation Publication (CAP) 1616.

0.2 The aim of this document is to provide Stakeholders with the information that they require in order to fully understand the MoD's proposal to generate new E-7 Wedgetail Operating Areas. This document will allow all Stakeholders to provide feedback on the airspace options as part of the consultation.

0.3 The scope of this consultation is limited to the generation of new E-7 Wedgetail Operating Areas in the UK UIR.

0.4 This document provides context to the proposal, including background to the extant E-3 Operating Areas and usage and why the MoD is seeking to introduce new E-7 Operating Areas.

0.5 Statement of Need (SoN). The Statement of Need was submitted to the CAA at Stage 1. It read as follows:

Currently the E-3D Sentry AEW Mk 1 utilises the UK AEW areas for UK training and operations. In 2023[1] the E-7 Airborne Early Warning Wedgetail Mk 1 will enter RAF service. Though fulfilling the same role as the Sentry, advances in technology mean that the Wedgetail will not be able to utilise exactly the same orbit areas. The Wedgetail will be required to fly approximately 100 nm by 20 nm areas. Best use can be made of some of the existing orbit areas (e.g. UK 1, 7 and 9) as they are both large enough to accommodate the Wedgetail flight profile and are appropriately located to enable Wedgetail to provide a service to its forecast traffic and trade. The existing orbit areas may still be utilised by NATO/visiting forces partners as the UK will retain its NATO commitment in this respect. Therefore, whist the extant orbit areas must remain in place for the time-being, there is a requirement for new orbit areas to be created where the current areas are not sufficient.

0.6 Several iterations of stakeholder engagement have already been conducted up to this point. In conjunction with the Option Appraisals the MoD has developed an airspace option to generate new E-7 Wedgetail areas that it is seeking to consult stakeholders on.

[1] E-7 In Service Date (ISD) has moved to Q3/4 2024.

Section 1 – Context

E-3D/E-7 Overview

1.1 Since 1991 the E-3D AEW Mk 1 Sentry has been the Royal Air Force's Airborne Early Warning and Control (AEW&C) platform. The aircraft have also sat as part of the NATO AEW&C fleet, contributing a 25% share of force output on training and operations. Developments in technology elsewhere, and the ageing of the airframes, has reduced the operational effectiveness of the E-3D fleet and so, in 2018, the UK MOD elected to replace the E-3D with the more modern, 5th generation E-7 AEW Mk1 Wedgetail. Currently operated by air forces in Australia, Turkey and South Korea, the aircraft represents a step change in capability and will bring the UK's airborne command and control capability into the 21st century. In order to capitalise on this new capability to the utmost, airspace change is required to enable most effective use of the E-7 sensor suite.

1.2 The 21 proposed E-7 Operating Areas are shown in Fig 1 below (A1, A2, B2 etc) and are highlighted in red (**bold** red outline). They are not to be confused with the MDAs that are also in red (no bold red outline). The extant E-3 Operating Areas are also shown for reference (UK 1 to UK 13) and are shown in blue.

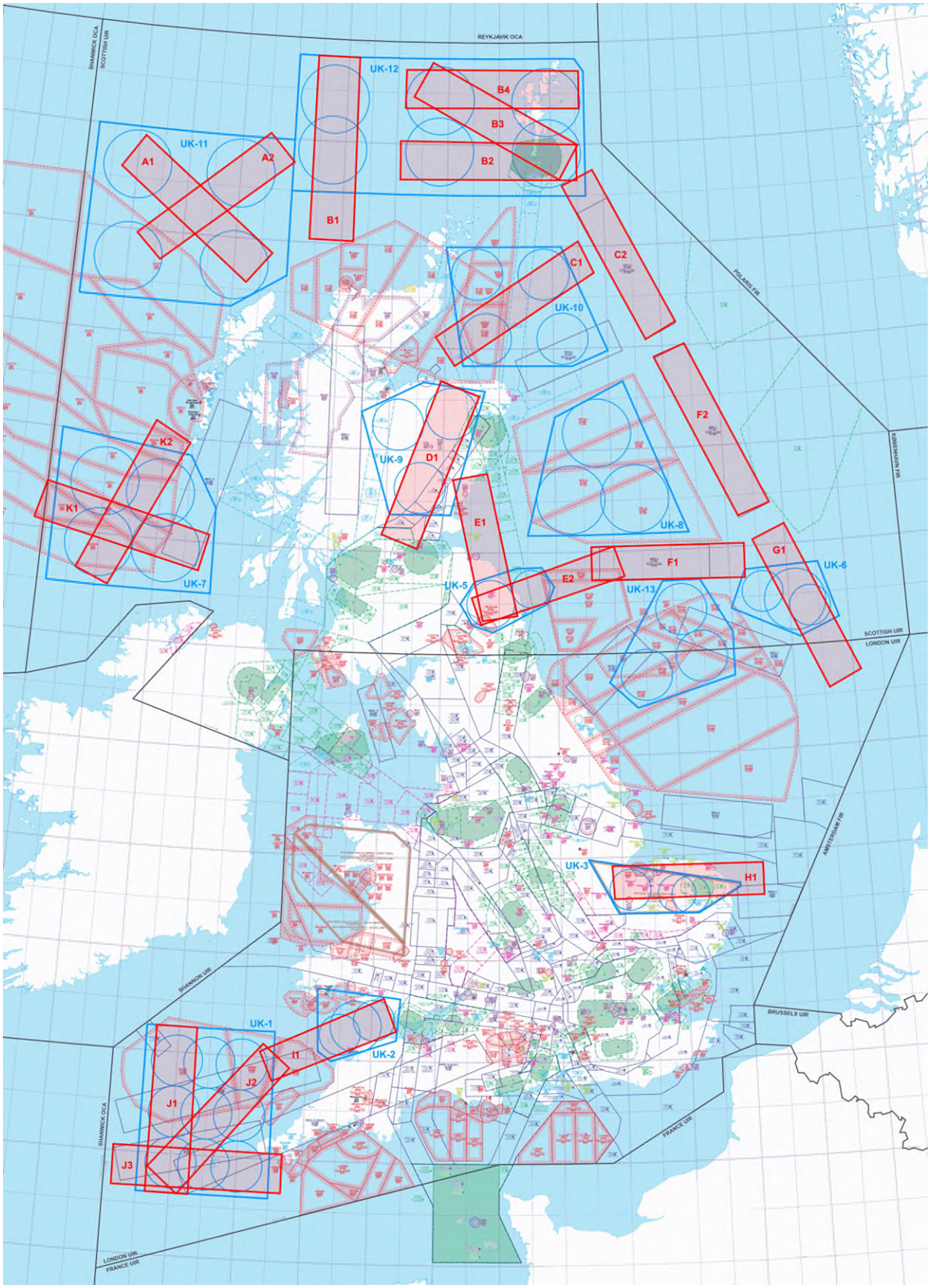

Figure 1 – Proposed E-7 Operating Areas (highlighted in red with bold red outline)

Impacts of proposed areas on existing environments/ATS structure

1.3 Following initial discussions with NATS, they were broadly content with the proposed E-7 operating areas as the majority were superimposed over the extant E-3 operating areas that have been successfully activated, controlled and co-ordinated for many years. Three of the proposed areas did cause some concern with respect to impact on climb out and decent profiles for specific ATS routes or proximity to adjacent FIR/UIRs. These were in East Anglia, the Bristol Channel and SWAPS. A summary of the affected ATS routes and FRA Reporting Points along with potential impact on ATS route structures is provided in Table 3 below with pictorial images of all the associated E-7 operating areas shown in Figures 3 - 10. **It should be noted that the proposed areas are non-segregated, will be tactically controlled, civilian air traffic can be routed through them and only 1 of the 21 operating areas will routinely be activated at any one time. Finally, weekend activation will be by exception.**

1.4 Initial discussions with Eurocontrol have also been conducted. The impact of the proposed E-7 operating areas on ATS routes to/from Europe is ongoing and the requirement for qualitative or quantitative modelling as a result of these new areas remains to be confirmed. If modelling is required, this will be generated and incorporated into Stage 3 during the 12 week CONSULT period. As such a series of online meetings involving Eurocontrol and NATS will commence as part of the CONSULT strategy. The first scheduled meeting will be programmed to occur mid-June (date TBC).

Area	Affected ATS Routes	Significant FRA Reporting Points in vicinity	Impact	Comment
A1	Nil	ATSIX, ORTAV, BALIX, ADODO	Limited, ATC coord with Shanwick	Oceanic Entry/Exit points
A2	Nil	ATSIX, ORTAV, BALIX, ADODO	Limited, ATC coord with Shanwick	Oceanic Entry/Exit points
B1	Nil	Nil	Limited, ATC coord	Nil
B2	Nil	PEPIN	Limited, ATC coord	Approaching POLARIS FIR
B3	Nil	PEPIN	Limited, ATC coord	Approaching POLARIS FIR
B4	Nil	GUNPA	Limited, ATC coord	Approaching POLARIS FIR
C1	Nil	BEKET, MONAV, SMOKI	Limited, ATC coord	Nil
C2	Nil	ORVIK, BEREP, RIGVU	Limited, ATC coord	Approaching POLARIS FIR
D1	P600 (up to FL255)	PTH (VOR/DME)	Limited, ATC coord	Nil

E1	Nil	Nil	Limited, ATC coord	Nil
E2	Nil	GOMOT, SUISS	Limited, ATC coord	Enroute Scandinavia
F1	Nil	BEVAM, CUTEL	Limited, ATC coord	Enroute Scandinavia
F2	Nil	FORTY, ODMIX	Limited, ATC coord	Enroute Scandinavia
G1	UL975, P144, M604	ROPAL, LARGA	Limited, ATC coord	Routing to Denmark and Norway
H1	M16, L603, P155, UM185, P144, P5	LAMSO, SOMVA, DOLAS	Main air routes North and South of H1. ATC coord to deconflict	Amsterdam FIR, routing to Europe
I1	L22, M140, L149, L180	MERLY, BCN (VOR/DME)	Limited, ATC coord with Shanwick	Routing to Oceanic boundary
J1	Nil	LESLU, ARKIL, LULOX, TURLU, GAPLI	Limited, ATC coord with Shanwick	Routing to Oceanic boundary
J2	Nil	Nil	Limited, ATC coord with Shanwick	Enroute to Oceanic boundary
J3	P86, L620	TURLU, GAPLI, RATKA, LND(VOR/DME)	Limited, ATC coord with Shanwick	Routing to Oceanic boundary
K1	N562	MIMKU	Limited, ATC coord with Shanwick	Routing to Oceanic boundary
K2	N562	MIMKU	Limited, ATC coord with Shanwick	Routing to Oceanic boundary

Table 1 – Airspace Impacts

1.5 The 21 proposed E-7 Operating Areas have been broken down into geographical sub areas and are shown below in Figures 2 - 9. Information on Operating heights, co-location with extant E-3 areas (where applicable) and conflicts with other significant airspace is also highlighted. Table 2 (following Figure 9) has the Latitudes and Longitudes of all the proposed E-7 Operating Areas. These still require verifying to ensure they are ADQ compliant. NATS have been requested to undertake this function which will be complete by the commencement of Stage 4 to allow for any amendments to be implemented during the Stage 3 CONSULT process.

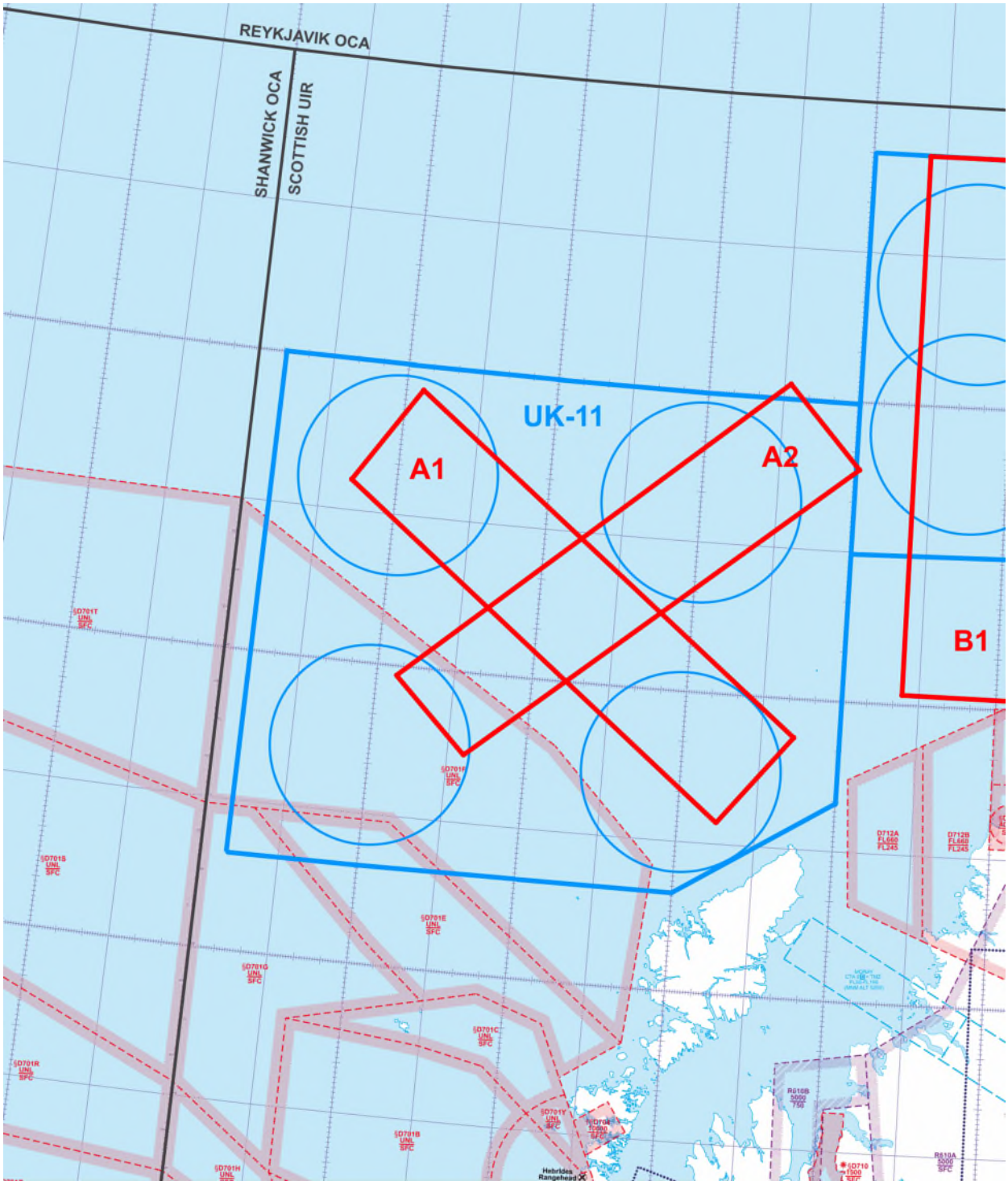

Figure 2 – A1 to A2 Outer Hebrides

Outer Hebrides

- FL270 – FL350
- Located within extant E-3 area UK-11
- Limited impact on high level air routes and FRA

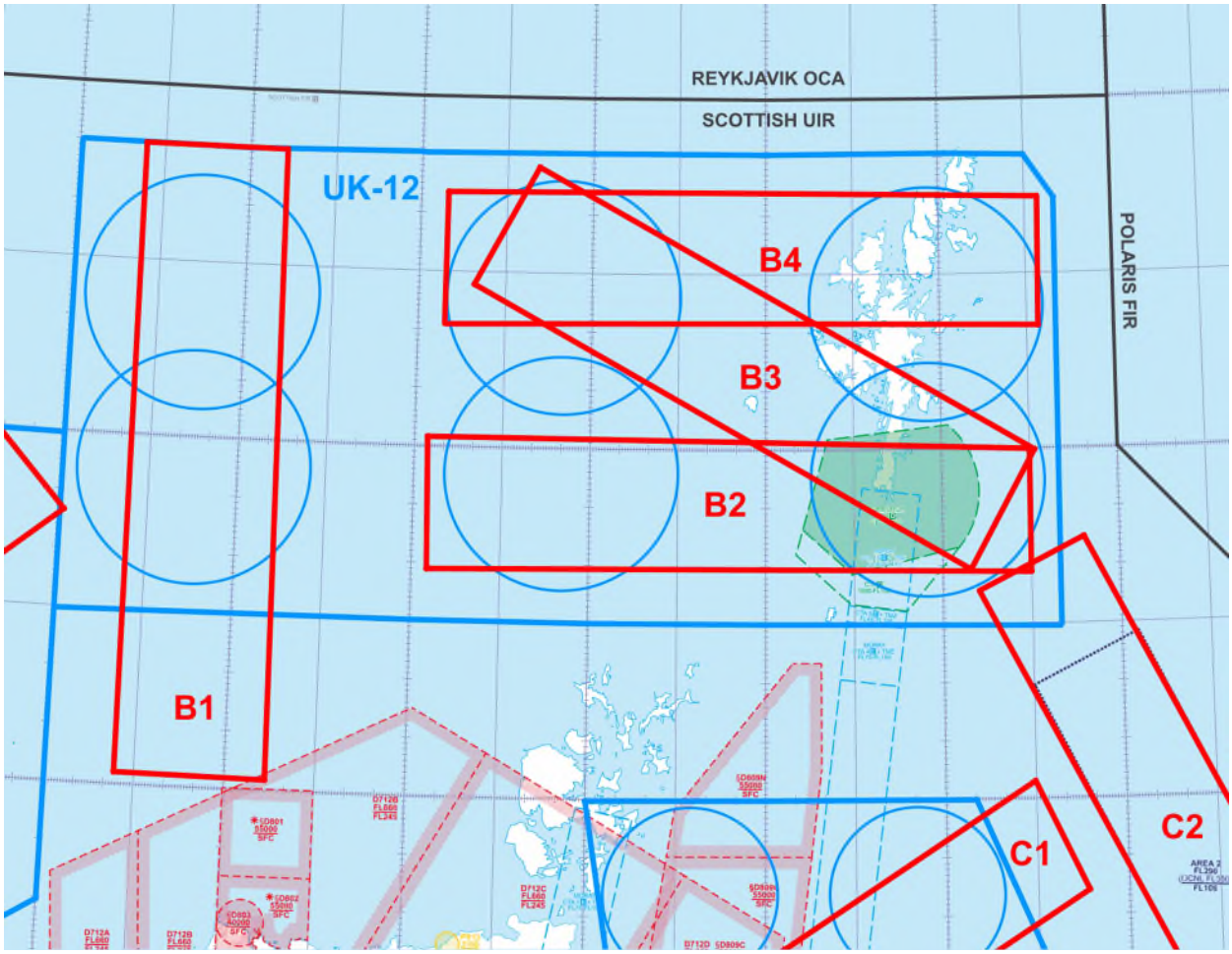

Figure 3 – B1 to B4 North Cape and Shetlands

North Cape and Shetlands

- FL270 - FL350
- B2-4 predominantly within bounds of extant E-3 area UK-12.
- Area B1 extends south towards D712.
- Limited impact on high level air routes and FRA
- Coord with Swanwick Mil regarding concurrent activation with D712.

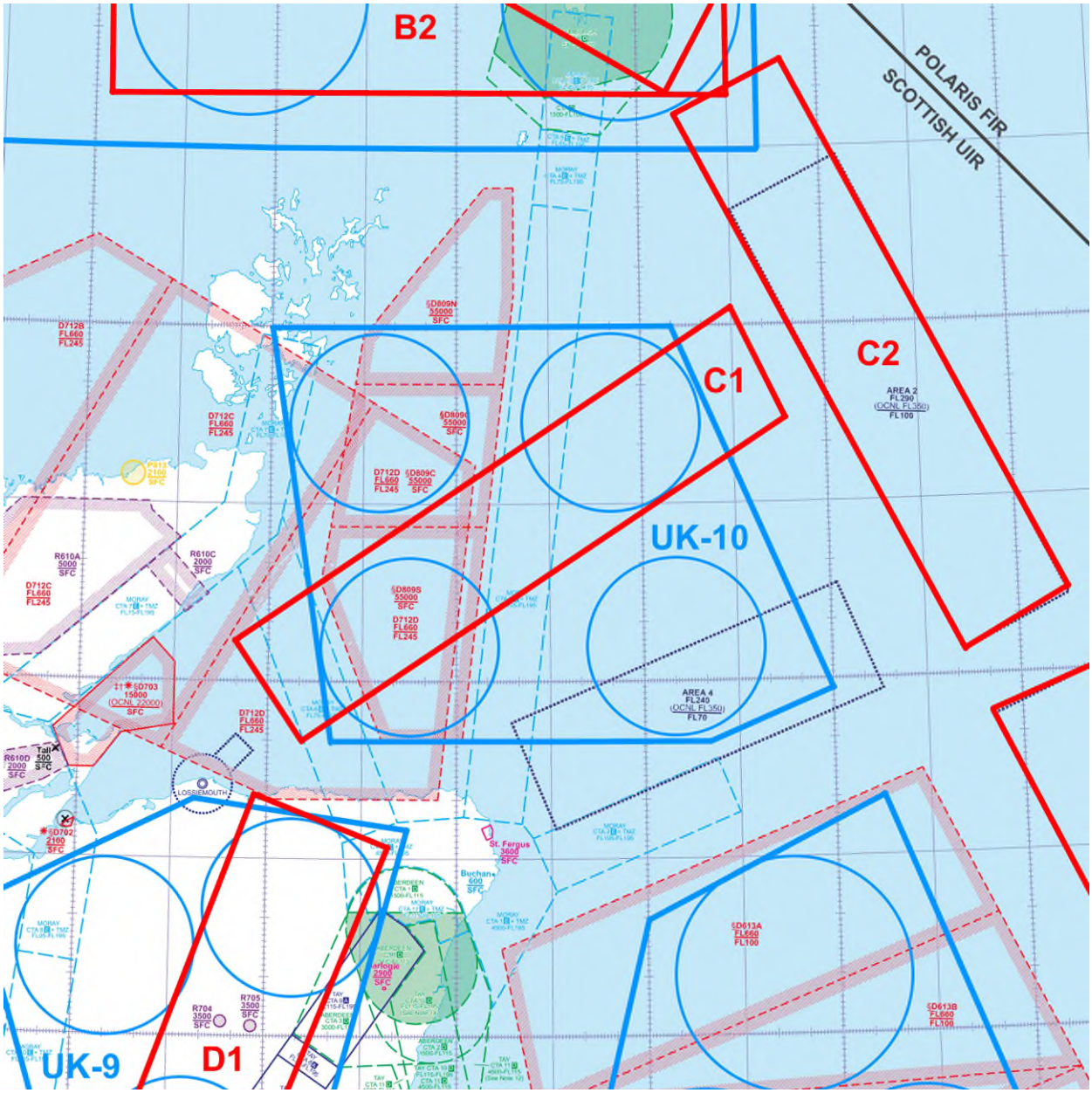

Figure 4 – C1 to C2 Moray Firth

Moray Firth

- FL270 – FL350
- C1 predominantly within extant E-3 area UK-10.
- Some overlap with D712 and D809 series (up to FL550). Coordination with Swanwick Mil.
- C2 new area to E of UK-10. Overlap with AARA2 (FL100-290) – coordination via Swanwick Mil or pre-flight planning.
- Limited impact on high level air routes and FRA.

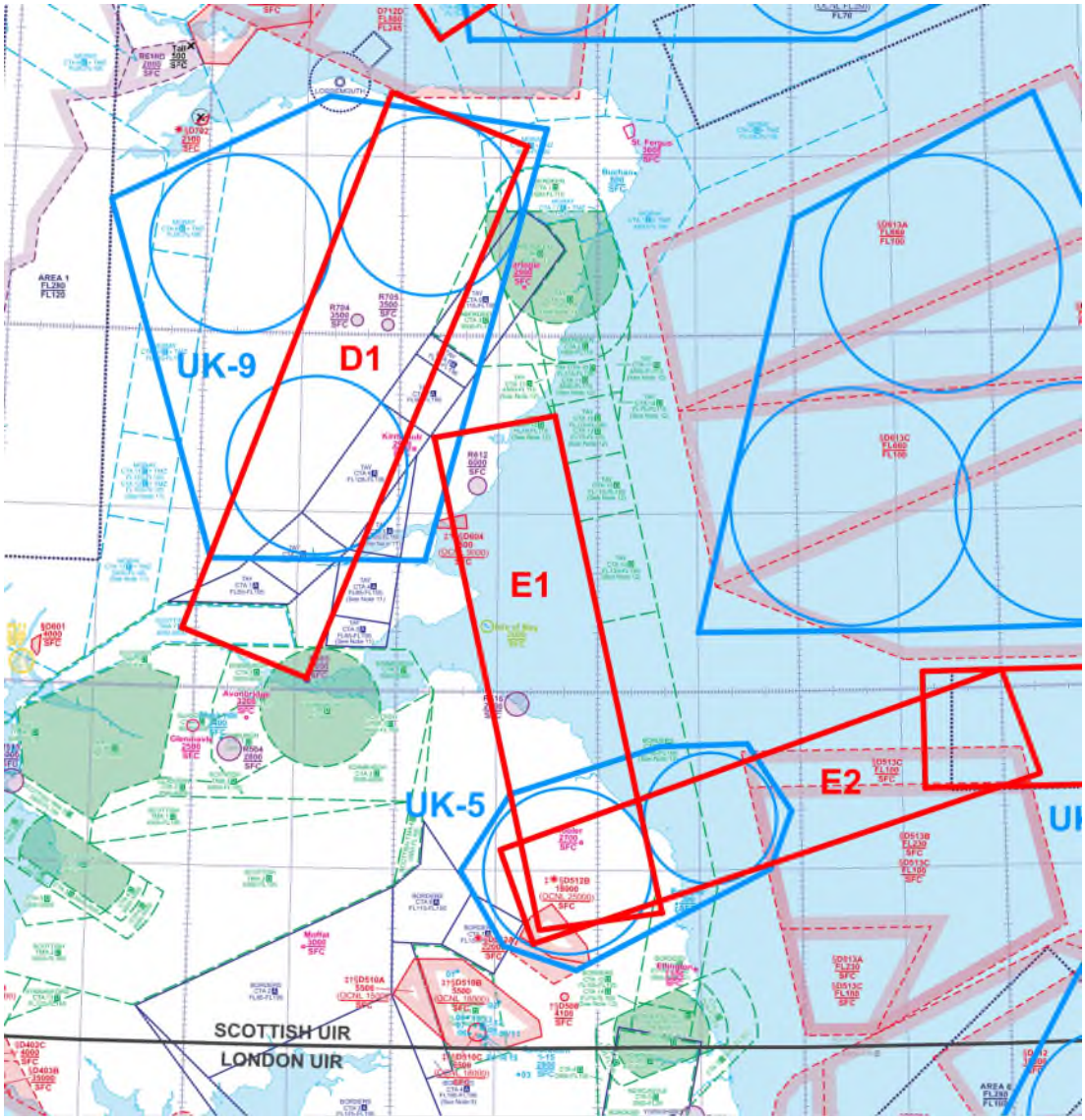

Figure 5 – D1 Scottish Highlands and E1 to E2 East Coast

Scottish Highlands

- FL270 – FL350
- Predominantly within extant E-3 area UK-9.
- Extends slightly south IVO Edinburgh and Glasgow Aerodromes. No effect on SIDS/STARS due to altitude.
- Limited impact on high level air routes and FRA.

East Coast

- FL270 – FL350
- E1 IVO Edinburgh and Newcastle Aerodromes. No effect on SIDS/STARS due to altitude.
- E2 IVO Newcastle Aerodrome only. No effect on SIDS/STARS due to altitude. Located above AARA5 (FL070-240) and between D323 and D613 series danger areas, coordination will be managed through Swanwick Mil/ASACS.
- Limited impact on high level air routes and FRA.

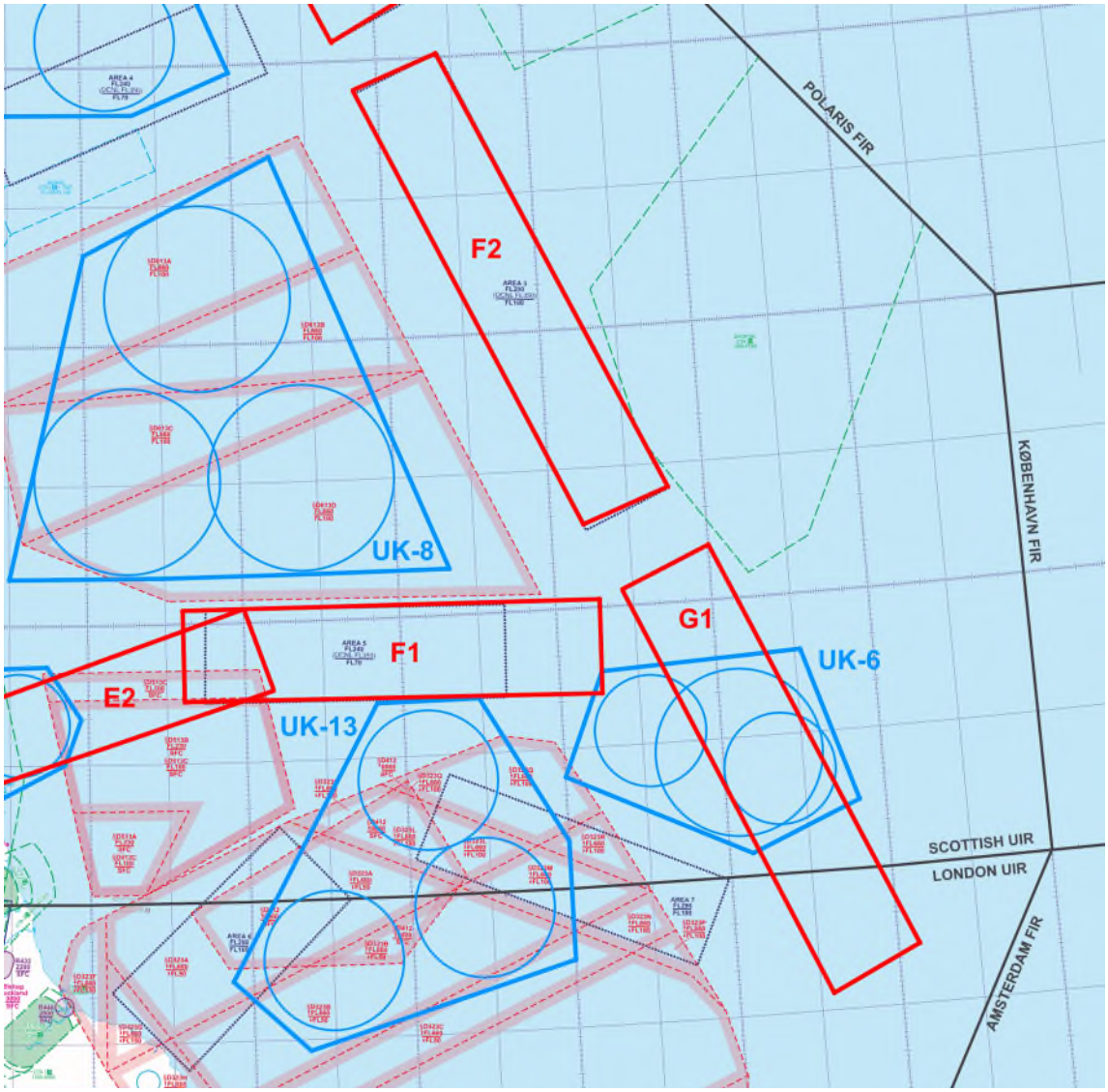

Figure 6 – F1 to F2 North Sea and G1 North Sea South

North Sea

- FL270 – FL350
- F1 located above AARA5 (FL070-240) and between D323 and D613 series danger areas, coordination will be managed through Swanwick Mil/ASACS.
- F2 to E of D613 complex and above AARA3 (FL100-290) – coordination through Swanwick Mil/ASACS.
- Limited impact on high level air routes and FRA.

North Sea South

- FL270 – FL350
- Located E of D323 danger area complex IVO AEW UK6. SE corner is approx. 20nm from UK UIR boundary. Notification of area activation will ensure adjacent ATC are aware.

- Upper airways routing N-S when D323 complex activated but traffic likely to be above E-7 operating level.
- Limited impact on high level air routes and FRA.

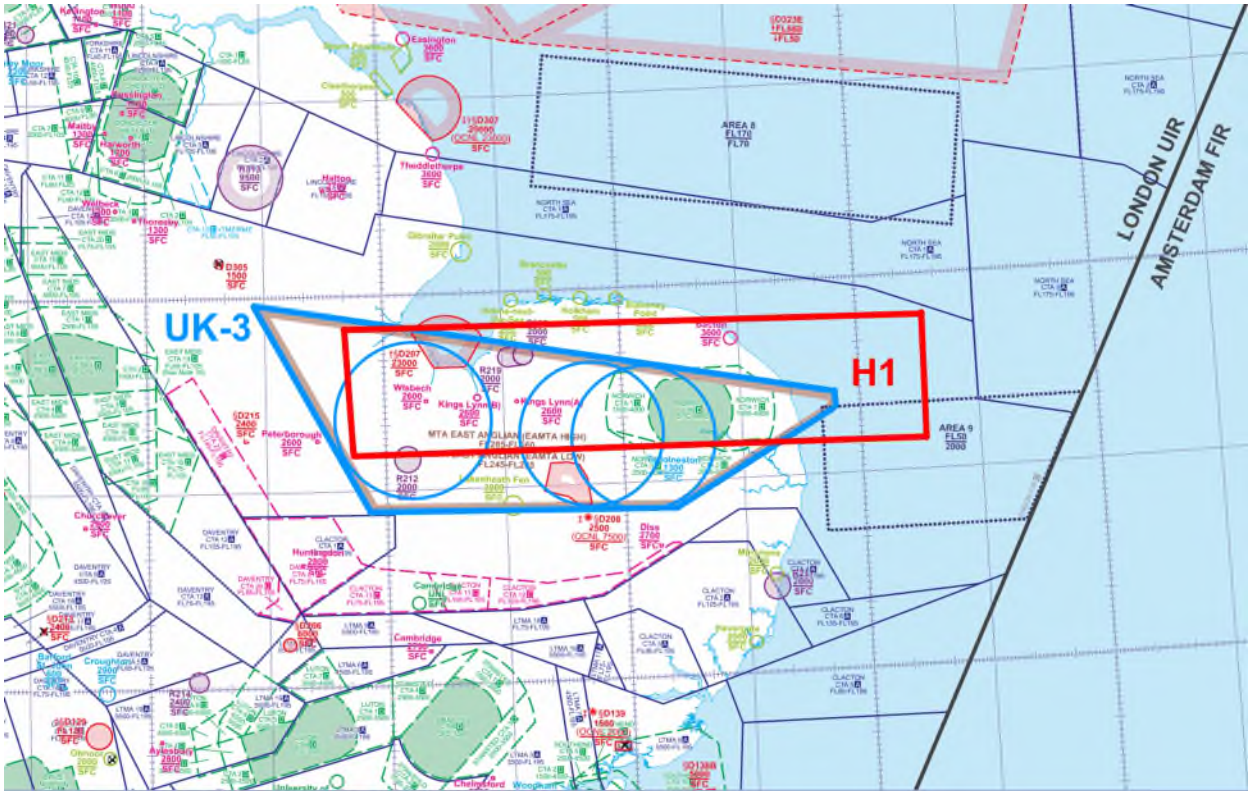

Figure 7 – H1 East Anglia

East Anglia

- FL270 – FL350
- Offset slightly North of extant E-3 area UK-3.
- Providing greater lateral separation from London Centre, and south of European air routes (e.g Y70). Above D207 dangers area (SFC-FL230).
- Eastern edge is approx. 25nm from UK UIR boundary. Notification of area activation will ensure adjacent ATC are aware.
- IVO Marham, Lakenheath, Mildenhall, and Norwich Aerodromes but assessed as limited impact due to altitude.
- **Some impact with high level air routes and FRA. Tactical co-ordination essential.**

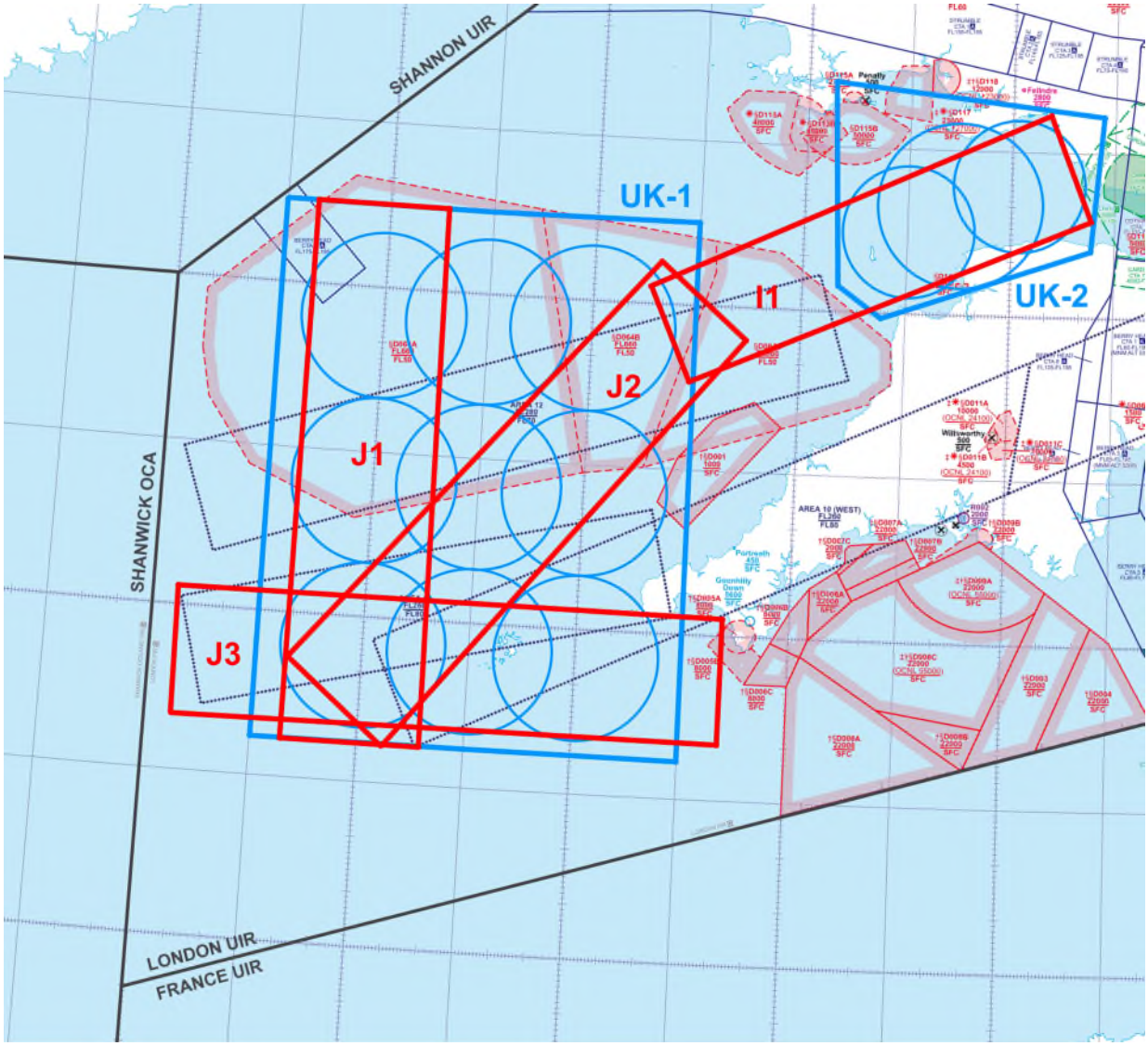

Figure 8 – I1 Bristol Channel and J1 to J3 Southwest Approaches (SWAPS)

Bristol Channel

- FL270 – FL350
- Partially contained within boundaries of extant E-3 area UK-2.
- Overlap with D064 danger area complex, and AARA12 (FL070-280), coordination by Swanwick Mil.
- South of South Wales danger areas
- West of Bristol and Cardiff Aerodromes, assessed as no impact due to altitude.
- **Possible limited impact on oceanic traffic climbing and descending from/into London.**

Southwest Approaches

- FL270 – FL350
- Predominantly contained within boundaries of extant E-3 area UK-1, the exception being J3 which extends slightly E and W.

- Overlap with D064 danger area complex, and AARA11 (FL080-260) and AARA12 (FL070-280), coordination by Swanwick Mil.
- NW corner of J1 is within 10nm of UK UIR boundary. SE corner of J3 within approx. 20nm of UK UIR boundary. Notification of area activation will ensure adjacent ATC are aware.
- **Possible limited impact on oceanic traffic climbing and descending from/into London.**

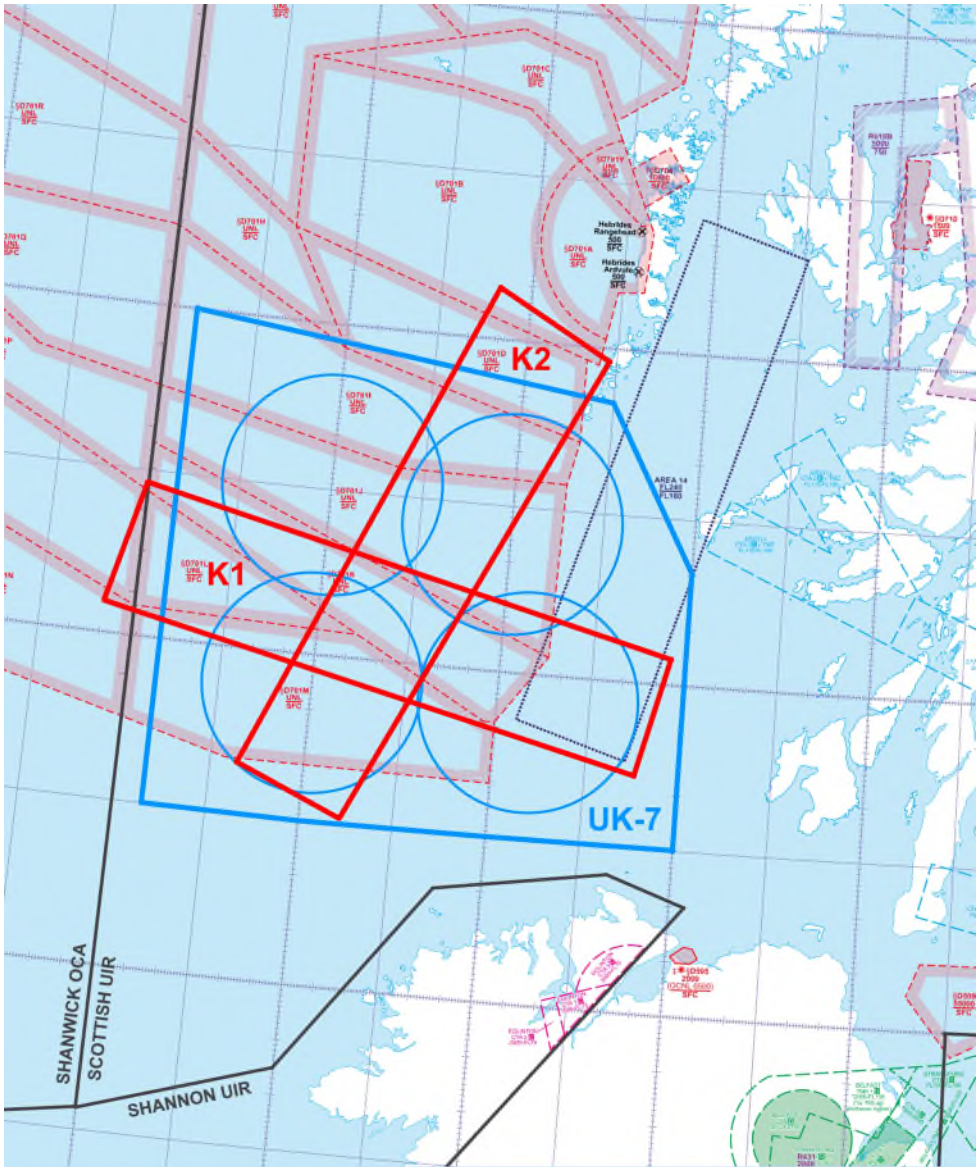

Figure 9 – K1 to K2 Benbecula

Benbecula

- FL270 – FL350
- Predominantly contained within boundaries of extant E-3 area UK-7.
- Overlap with D701 Danger Area series. Benbecula range coordination required through Swanwick Mil.
- Possible limited impact on oceanic traffic.

AREA	Lat/Long	Lat/Long	Lat/Long	Lat/Long
A1	5955.5N00853W	5936N00918W	5834.5N00645W	5852.5N00617W
A2	6003N00628W	5947N00558W	5844N00823W	5858N00852W
B1	6050N00537W	6050N00447W	5902N00447W	5902N00537W
B2	5939N00355W	6002N00356W	6000N00030W	5939N00031W
B3	5939.5N00050W	6000N00028W	6048.5N00319W	6028N00341W
B4	6044N00352W	6021N00350W	6021N00026W	6043N00025W
C1	5903N00030W	5844N00013W	5750N00249W	5807N00310.5W
C2	5945N00012W	5936N00048W	5804N00041E	5814N00116.5E
D1	5741N00304W	5610N00405W	5602N00327W	5732N00221W
E1	5647N00213W	5643N00250W	5520N00217W	5523N00141W
E2	5517.5N00219W	5534N00229W	5603.5N00000E	5545N00011E
F1	5603N00024W	5602N00217E	5541.5N00216E	5543N00024W
F2	5801N00124E	5754N00050E	5618N00213E	5625N00246E
G1	5603.5N00226.5E	5612N00300E	5443N00408.5E	5434N00334E
H1	5255N00010W	5236N00008W	5234.5N00216E	5254N00216.5E
I1	5137N00349W	5118N00337W	5046N00532W	5103.5N00544W
J1	5115N00721W	5115N00643W	4937N00643W	4937N00721W
J2	5108N00541W	5054N00515W	4937N00653W	4952N00721W
J3	5003.5N00753W	4940N00753W	4940N00519W	5003.5N00519W
K1	5605N00705W	5628N01000W	5606N01010W	5543N00714W
K2	5709.5N00811W	5658N00732W	5531N00847W	5539N00921W

Table 2 – Latitudes and Longitudes of proposed E-7 areas

Airspace Stakeholders

1.5 This is proposed as a level M2 consultation - a proposed change where the anticipated consequences are either (a) an alteration of civil aviation traffic patterns at 7,000 feet or above[2] or (b) no impact on civil traffic - The MoD requirement for the E-7 Operating Areas is FL270 – FL330, a significant factor in reducing the impact on other airspace users and therefore reduces the amount of local airspace stakeholders.

1.6 Airspace Stakeholders have been broken down into the following groups.

1.6.1 External Aviation Stakeholders.

External Stakeholders		
British Gliding Association (BGA)	EuroControl	NATS

1.6.2 Internal MOD Stakeholders.

Internal MoD Stakeholders (*via DAATM)		
HQ 1 Group*	HQ 2 Group*	11 Gp A7*
Military Aviation Authority (MAA)	Defence Airspace and Air Traffic Management (DAATM)	Swanwick Mil

Why are the MoD proposing the creation of new E-7 Wedgetail Operating Areas?

1.7 The now obsolete RAF E-3D Sentry and the NATO E-3A operated throughout the UK in a series of dedicated operating areas. The E-3A will continue to use these areas until 2035 when it is due to go out of service. The E-3D flew in circular orbits (normally 15nm radius) or between 2 x orbits in a racetrack pattern. The circular orbits were contained in the larger E-3 operating areas. The E-7 Wedgetail is fitted with an advanced MESA radar; to optimise its performance the aircraft needs to fly in long straight legs of approx. 100nm. The proposed E-7 Operating Areas are approx. 100nm x 20nm to allow this to occur. Unfortunately, not all the E-3 operating areas are large enough to accommodate the100nm legs required for the E-7, are in the wrong geographical location/orientation and sometimes are a combination of both. Dedicated new areas are therefore proposed for the E-7 Wedgetail. Wherever possible these areas have been geographically located in the vicinity of the E-3D operating areas. The areas are in the height band FL270 – FL350 and are non-segregated which means airliners can transit through them at the same time as the E-7 is operating as long as minimum lateral and vertical separation is maintained by ATC. **They are tactically controlled by ATC.**

1.8 In order to meet the operational and training requirements for the E-7 the following assumptions were agreed at Stage 1:

- The areas will be non-segregated.

[2] CAP1616 Page 26

- The defined areas will allow interaction on the NATS equipment to ensure controllers are alerted to potential confliction.

- Confliction resolution will be tactically managed against the specific aircraft, not the airspace.

- The airspace will define the scope of the area where the E-7 has non-deviating status, which is similar to how the E-3D operated.

- The levels required for the areas will be fully contained in Class C airspace.

Section 2 – Proposed Options

Design Principles

2.1 At Stage 1 the Sponsor, with feedback from Stakeholders, established a set of Design Principles in which to guide the airspace design options. The design principles agreed at the Stage 1 and 2B Gateway are as follows:

DP ID	Agreed Design Principle
a	Must be safe. The defined airspace must provide ATS providers a known traffic environment to ensure safe separation against GAT.
b	Defined areas must be sufficient in location to achieve training and operational objectives.
c	Defined areas must be the minimum dimension to achieve task.
d	Minimise the impact to Commercial Air Traffic flow, sector complexity and sector capacity.
e	Airspace management and FUA principles will be applied to ensure collaborative decision-making protocols and management processes are established.
f	Defined areas shall not be segregated airspace but will align to current or revised procedures detailed within current NATS/MOD interface documents.
g	The defined areas will detail the separation standard required between GAT and the OAT using the designated area.
h	The design shall seek to rationalise existing areas where appropriate.
i	The design shall minimise the impact on all ATM stakeholders. This will include NATS and other ANSPs (including foreign ANSPs) so as not to over complicate airspace, sector design and service provision.

Design Option Summary

2.2 The Sponsor initially examined 3 options with respect to new operating areas for the E-7 Wedgetail. One option the “do minimum” (operate in MDAs and modified E-3 areas) was rejected at Stage 2 of the ACP resulting in 2 being assessed at Stage 3. The “do nothing option” (Option 0) was to operate in extant E-3 orbits despite them being of incorrect dimensions and geographical orientation to optimise the E-7 Multi-role Electronically Scanned Array (MESA) radar. **The only remaining option (Option 1) to be carried forward and assessed was to “create dedicated E-7 areas” which were of the correct dimension, orientation, and geographical positions to optimise the radar and allow the aircraft to conduct its military defence tasks.**

2.3 The sponsor has evaluated the remaining Design Option against the "Do nothing" option and assessed whether each of the individual Design Principles were "met", "partially met" or "not met" for it. The "Do nothing" option failed to meet 2 of the 9 Design Principles whereas Option 1, create Dedicated E-7 areas, met all 9 Design Principles. The 2 options are summarised below.

	Option	Description
0	Do Nothing	Operate in extant E-3 orbits. This will limit the operational effectiveness of the E-7 Wedgetail sensor, hindering its ability to fulfil defence tasks. In summary, the E-7 would operate in the same manner and areas as the E-3.
1	Create dedicated E-7 areas ***Recommended***	Create new E-7 Wedgetail areas, predominantly co-located with existing AEW orbit areas. This option meets all the DPs, enhances safety, reduces complexity, maintains the predictable traffic environment and meets the operational requirements of the MOD.

Conclusion

2.3 The proposed option, "Create dedicated E-7 areas" provides considerable benefit over Option 0, "Do nothing". There are minimal financial and other costs involved in the introduction of dedicated E-7 areas. There are also several advantages; these include safety, operational effectiveness, flexible use of airspace and environmental savings. The sponsor has also considered the impact of Option 1 on other airspace users who may be affected by this ACP. **Whilst there will be some routine tactical coordination required to allow both the MOD and civilian operators to operate safely in the same non-segregated airspace this is no different to current procedures.** The Sponsor therefore assesses there are no disadvantages to other airspace users by implementing Option 1. Finally, the creation of dedicated E-7 operating areas allows the MOD to position this air system in the optimum geographical location to maximise the effectiveness of its advanced MESA radar ensuring all training, operational and defence tasks are met. **As such, Option 1 is the preferred option of the Sponsor.**

2.4 Stakeholders are requested to make comment on the proposed Option 1 via the Consultation Feedback Form, available at both annex A and the Citizen Space Portal when the consultation period begins on 5 June 2023. Continued engagement and consultation will take place with all findings taken into consideration.

Operating Principles

2.5 **Activation.** The designated E-7 operating area will be notified to Swanwick Military on a day-by-day basis approx. 2 hours prior to aircraft departure (normally by a Military Pre-note/F2919 Flight Plan). This will allow Swanwick Mil sufficient time to co-ordinate with the relevant Civilian Sector. As the airspace is non-segregated airliners

can route through the E-7 operating area as long as minimum vertical and lateral clearances are maintained by ATC.

2.6 **Frequency of flights.** It is anticipated that the E-7 will fly one sortie per day (Mon – Fri) utilising one or more operating areas. The duration of the flight will be approx. 10 hours of which 2 hours may be used to transit to/from the area. Additional flights may be required in support of major National/NATO Exercises or in support of National Security tasks.

2.7 **Hours of Operation.** The E-7 will normally be tasked to support UK/USAFE Fast Jet training in the MDAs. This routinely occurs during daylight hours but also includes a less frequent element of night flying. The designated E-7 operating area will be active for up to 8 hours. The airspace is non-segregated.

2.8 **Free Route Airspace (FRA).** As the proposed E-7 Operating Areas are non-segregated the introduction of FRA within the UK FIR should not be affected.

2.9 **Operating Authority.** HQ 1 Gp is the Operating Authority for the E-7 Wedgetail.

Section 3 – Effect of Proposed Options

Noise and Environmental Impact

3.1 As a result of step 2A and the Design Principle Evaluation, only one option alongside the "do nothing" baseline was carried forward**; the introduction of dedicated E-7 Operating Areas**. Section 3 of this document shows the noise and environmental impacts of this proposed option.

Noise Impact

3.2 The Department for Transport Air Navigation Guidance 2017 details the Government's altitude-based guidance.

- It clearly states that for all changes to airspace with no impact below 7000 feet the CAA should prioritise the reduction of aircraft CO2 emissions and the minimising of noise is no longer the priority; **The sponsor invites CAA to agree that this proposal constitutes a Level M2 in line with this guidance.**

Environmental Impact

3.3 The Air Navigation Directions 2017 enable the CAA to disregard the environmental impacts of military aircraft when the proposal has been submitted by, or on behalf of, the MoD. However, the CO2 emissions of civil aircraft re-routing as a consequence of the proposed change must be assessed. A qualitative assessment has already been conducted. The Sponsor has liaised with NATS with respect to conducting quantitative modelling.

NATS Assessment on Quantitative Modelling

3.4 NATS were consulted over the value of investing in Quantitative Modelling, their Analytics team came up with the following conclusion:

The view is that it is not possible to accurately assess the environmental impact of E7 airspace and therefore it is an ineffective use of time and effort to perform any such task. The main constraining factors being:

- *The proposed airspace is not segregated from the network (and so does not affect the pre-tactical or flight planning aspects which would normally be assessed to measure any change to the current baseline)*
- *As it is only the aircraft that needs to be deconflicted from GAT, the airspace and aircraft are coordinated on a tactical basis between Mil and Civil ATC as and when required, at a mutually convenient level in the confines of the lateral airspace.*
- *The tactical nature and multiple variables at play here including multiple locations, time of day, required/requested levels, GAT / Network demand and frequency for example, adds significant complexity.*

It is our view that at best, and if even possible, any analytics would be excessively complex and unreliable to the point that the effort required would be prohibitive and any output would come with a number of CAVEATS that would make it open to challenge.

In summary the time, cost and complexity required to produce any data would not be proportionate to the change. Clearly there will be some Operational impact and we look forward to continuing our discussions on this and will, of course, provide formal feedback into the ACP process.

3.5 **The Change Sponsor suggests that in line with the NATS Assessment on Quantitative Modelling any further effort to calculate any economic impact / impact on fuel burn and CO_2 emissions is unlikely to provide any valuable or meaningful measurements and would be disproportionate to the impact itself. The MOD proposes it is scoped out of this ACP.**

10 Year Forecast

3.6 It is anticipated that sortie rates for the E-7 fleet will not increase at all in the 10 years post in service date. This is predicated on annual flying rates mandated by the Royal Air Force. Whilst there is some ongoing discourse about an increase in the fleet size to the original planned 5 airframes, should this ever be achieved it is assessed that it will not increase UK FIR E-7 flying as it would predominantly come with increased deployment of the capability to overseas locations.

Airspace Change Proposal Classification

3.7 The changes proposed in this ACP affect civil aviation traffic patterns at 7000’ or above and is therefore expected to be classified as **M2**. For the environmental assessment of a level M proposal, the Ministry of Defence need only ever assess the anticipated environmental impacts of the consequential changes on civil aviation patterns.

Section 4 – Consultation Process

Consultation Duration

4.1 Subject to CAA feedback, the Sponsor is conducting a 12-week consultation (step 3C) commencing on 5 June 2023 and finishing on 28 August 2023. This is to ensure all stakeholders who wish to provide feedback have sufficient time to do so. A reminder will be sent 2 weeks prior to the close of consultation, on 11 August 2023.

4.2 As per the Consultation Strategy, should stakeholders wish to have a virtual consultation, a Microsoft Teams meeting will be arranged via the Citizen Portal.

Purpose

4.3 The purpose of this consultation period is to provide an opportunity for all stakeholders to comment on the proposed airspace design option. This feedback will be collated and analysed by the Sponsor and help to shape the final proposal that will be submitted to the CAA.

4.4 The key themes that the Sponsor is seeking to answer through consultation include, but is not limited to, the following:

- The perceived effect of this proposal (positive or negative).
- Key concerns for stakeholders.
- Mitigating factors that could be employed to minimise impact.

How to respond

4.5 In accordance with CAP1616 this consultation will be undertaken through electronic communication, and it is therefore requested that stakeholders wishing to provide feedback do so through the Questionnaire on the Citizen Space online portal.

4.6 A link to the Citizen Space Portal can be found here. All consultation documentation can be found at the link, additionally all relevant documentation so far can be found at the CAA airspace change portal, found here.

4.7 Should stakeholders wish; they can submit a written response. On receipt, it will be uploaded the CAA portal. Postal address:

FAO: [redacted]
ISTAR FHQ
RAF Waddington
Lincoln
LN5 9NB

Next Steps

4.8 Consultation responses will be collated and assessed throughout the consultation period. Once the consultation period has closed on 28 August 2023, the Sponsor will analyse and categorise all responses received and a consultation report published articulating the categorisation process, articulate issues raised and how they have been resolved. Finally, it will confirm the option to be submitted to the CAA or what additional amendments are to be made to the chosen design as a result of consultation feedback. The Sponsor will then upload the document to the Portal once the CAA has confirmed that no further consultation is required.

4.9 Timeline of steps and gateways:

Stage/Step	Description	Gateway Date
3C	Consultation Launch	5 June 2023
	Reminder to Stakeholders	11 August 2023
3D	Collate and review responses from consultation.	28 August 2023
4A	Update design	11 September 2023
4B	Submit Airspace Proposal to the CAA	27 October 2023
5	DECIDE Gateway	12 January 2024
6	IMPLEMENT into AIRAC 04/2024	April 2024

4.10 The Sponsor will continue the ACP process in accordance with the timeline agreed, submitting all required documentation in Stage 4A and 4B in order to allow the CAA to conduct the DECIDE gateway for 12 January 2024.

Appendix A – Consultation Feedback Form

The following is the print copy of the online Consultation Feedback Form that will be distributed to stakeholders upon request

Introduction of E-7 Wedgetail Operating Areas, ACP-2020-024

The MoD identified a requirement to introduce dedicated operating areas for the E-7 Wedgetail. These will replace the extant E-3 D Sentry operating areas although these will remain until 2035 to allow the NATO E-3A to operate in the UK. New areas are required to ensure that the E-7 can operate its sensors to their maximum operational effect in support of UK defence and security tasking.

The purpose of this consultation feedback is for all stakeholders to be able to respond effectively to the information provided. The feedback form will assist in gathering and considering opinions and information from relevant stakeholders regarding the potential impact of this ACP. **In response to Questions 9, 10 and 11 please annotate if you are providing feedback on a single proposed E-7 area (for example D1) or a series of areas (for example J1 to J3).**

The methodology of this consultation is summarised in the Consultation Strategy, which can be read in conjunction with the Consultation Document and the Full Options Appraisal. The consultation period is from 5 June 2023 to 28 August 2023. Once consultation has ended, all feedback will be considered for the final design proposal. The final design proposal may evolve from that described in the Consultation Document, subject to stakeholder input.

1. What is your name?

2. What is your email address?

3. Please enter your postcode

4. Are you responding as an individual or do you represent an organisation?

5. If you are responding on behalf of an organisation, what is the name of the organisation?

6. If you are responding on behalf of an organisation what is your position/title?

7. What best describes your association with this airspace change?

Aviation Stakeholder Other

Please state in the box below

8. Please circle your response to the Airspace Change Proposal 2020-024.

   Strongly Support Support Neutral Object Strongly Object

9. Please explain your response to Q8.

10. The MOD is keen to reduce the impact of its operation on other airspace users. What mitigations would you suggest that would resolve concerns that you have?

11. Are there any other general considerations that you would like the MOD to consider in relation to this Airspace Change Proposal?

12. In accordance with CAP1616, consultation responses will be published on Citizen Space via the CAA Airspace Change Portal. Responses will be subject to moderation by the CAA. Please indicate below if you would prefer for your response to be published anonymously (personal details will only be seen by the CAA).

    ☐ Publish Response

    ☐ Publish Response Anonymously