



Ministry
of Defence

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23 June 2023

ACP-2021-048
Airspace Change Account Manager
Civil Aviation Authority
Aviation House
Gatwick Airport South
West Sussex
RH6 0YR

ACP-2020-048, Approval Conditions CAP2362

References:

1. TDA EG D597 Activation Request Amendment September 2023 – email 5 May 2023
2. TDA EG D597 Activation Request 2023 – email 31 Mar 23
3. [EG Sup 2023 005 en.pdf \(ead-it.com\)](#)

In accordance with CAP2362 the Change Sponsor is required submit responses related to the approval conditions (including engagement evidence) for the July/August and September 2023 activations associated with ACP-2021-026.

Stakeholder Engagement Summary

Prior to the proposed summer activation period the Sponsor wrote to all identified Stakeholders as per references 1, 2 and 3; the below table summarises the associated limited exchanges. The Sponsor had previously consulted with Stakeholders regarding the Summer activations as per reference 2 – however driven by operational requirements a subsequent amendment to the September 2023 dates was requested.

Reference ID	Stakeholder	Feedback	Sponsor Response
1	Edinburgh Airport (5 May 2023)	Acknowledgement of correspondence regarding proposed amendments to the September 2023 activation dates.	Acknowledgement of email exchange with Stakeholder
2	Borders Gliding Club (11 May 2023)	Amendments will not have a major impact on the Borders Gliding Club at Milfield.	Acknowledgement of email exchange with Stakeholder
3	Newcastle International Airport (5 May 2023)	<p>Stakeholder advises that through their own analysis there is an increased requirement for TDA EG D597 in September 2023.</p> <p>Stakeholder concern regarding mission creep and extending beyond agreed timings. Stakeholder states that there appears to be no agreement regarding number of activations (infers agreement for ACP-2020-026).</p>	<p>Sponsor acknowledges that there is an uplift in demand and explains that this is driven by operational requirements.</p> <p>Sponsor reassures Stakeholder that whilst the overall demand increases for September 2023 – a number of the requests are for night-time activations, when the overall burden is assumed to be reduced (in the absence of any commercial operator forecast).</p> <p>Sponsor requests commercial operator forecast for aircraft routing to/from Newcastle via the Copenhagen boundary in order to assess impact and offers assurance that a service will be provided to these movements as per a condition of the activation.</p> <p>Sponsor provides Stakeholder with an extract from Consultation Document (ACP-2020-026) that clearly identifies the aspirational number of activations of Segregated Airspace for permanent change.</p>
4	Newcastle International Airport (7 Jun 2023)	<p>Stakeholder advises that accurate forecast cannot be provided and suggests that Sponsor seeks information through consultation.</p> <p>Stakeholder expresses concern regarding lack of Pennine Radar Service, congestion around TDA, increased activities, uncoordinated traffic and behaviours of exercise participants.</p>	<p>Sponsor advises that in the absence of any commercial operator forecast analysis has been conducted using STATFOR and NATS forecast, supplemented by historic activations of TDA EG D597 using the replay function of ADS-B Exchange. Sponsor advises that Consultation process has been followed with associated engagement with Stakeholders.</p> <p>Sponsor advises that Stakeholder is recommended to discuss Pennine Radar Service with the CAA as outside the scope of this ACP. Sponsor refers to LoA and requirement for robust ingress/egress plan to segregated airspace and advises of additional recommendation to Teesside based exercise participants. Sponsor provides summary regarding exercise rules and mandated elements for all participants.</p>

Reference ID 1

From: [REDACTED]

Sent: 05 May 2023 08:57

To: [REDACTED]

Cc: [REDACTED]

Subject: FW: TDA EG D597 Activation Request Amendment September 2023

Good morning [REDACTED], Thank you for this.

I shall forward a copy to ANSL in ATC to make sure they have a copy.

Kind regards

[REDACTED]

[REDACTED]

[REDACTED]



[REDACTED]

www.edinburghairport.com

Edinburgh Airport Limited
2nd Floor Terminal Building
EH12 9DN, Scotland

Reference ID 2

From: [REDACTED]

Sent: 11 May 2023 18:18

To: [REDACTED]

Subject: RE: TDA EG D597 Activation Request Amendment September 2023

Hi [REDACTED]

The amendments will not have a major impact on the Borders Gliding Club at Milfield.

Kind regards,

[REDACTED]

[REDACTED]

Airspace & Military Liaison Officer
Borders Gliding Club

[REDACTED]

Reference ID 3

From: [REDACTED]

Sent: 09 May 2023 16:53

To: [REDACTED]

[REDACTED] nt September 2023

[REDACTED]

Afternoon – apologies for the slightly delayed follow up regards the proposed change to the September 2023 activation dates for TDA EG D597.

Noted that there is an increase to the overall activation requests for September 2023, but I was hoping that a shift to some night-flying serials for September 2023 would help to alleviate some of the overall burden. We have also minimised our proposed activation dates for July/August 2023 (only 4 day and 2 night activations in total over July/August) to reduce our overall impact during the peak summer period.

I recall when we met with DAATM on (20 April 23) we discussed that your peak operational commercial timings at Newcastle are 0600, 1400 and 0000 UTC and I was therefore positive that with the planned timings for TDA activations in September of 0900 – 1300 and 1930 – 2330 UTC we would minimise any disruption to your business?

We do not want to push the boundaries but maximise airspace sharing opportunities and seek to engage with you as a key stakeholder to balance your needs against the current operational threats that we could possibly face, the use of TDA EG D597 is essential for us to operate effectively as a large force and work seamlessly with our NATO allies.

In order for me to objectively analyse the severity of the impact upon Newcastle International for September 2023 could you please provide an indication as to the number of aircraft you expect will follow the TOWTE/BAZNA profile in/outbound from Newcastle to/from the Copenhagen Boundary so that I can investigate the suitability of the proposed activation date/times? 78 Sqn will of course prioritise these flights as a mandated part of the activation.

The below is a snip from Page 20 of the Consultation Document for ACP-2020-026 and provides a more accurate indication for the longer term activations of Future Combat Airspace (beyond 2023).

	Season	Activations (total)	Duration (hours)
Exercise A	Spring/Summer	25	4 hours
Exercise B	Spring/Summer	12	4 hours
Exercise C	Throughout the year	18	4 hours

Regards

[REDACTED]

[REDACTED] | SO2 A7 Training Enablers | HQ11 Gp | Air Command | Hurricane Block | RAF High Wycombe | Walters Ash | Bucks | HP14 4UE | [REDACTED] | Skype +443001583835 | Email: [REDACTED]

From: [REDACTED]

Sent: 05 May 2023 08:28

To: [REDACTED] >

Subject: RE: TDA EG D597 Activation Request Amendment September 2023

Hi [REDACTED]

I've done my own comparison and see an increase of 71%; is this correct? From 8 x 4 hour activations to 14 x 4 hour activations.

This confirms my concerns expressed to you already about mission creep and extending beyond the already notified and agreed timings. I am surprised the MoD are pushing the boundaries already.

As we still have no limitations or agreements on number of activations and timings in any given time period and as these activations may impact commercial air traffic in/out of NCL we do object to the additional activations entirely.

[REDACTED]
[REDACTED]

Reference ID 4

From: [REDACTED]

Sent: 13 June 2023 17:07

To: [REDACTED]

Subject: RE: TDA EG D597 Activation Request Amendment September 2023

[REDACTED] evening - thanks for the below.

When compared to the activations of Summer '22 I agree that there has been an overall increase in the Summer activations for '23, this is driven by defence strategic direction.

The extract relates to the maximum aspirational number of activations for the permanent danger area for longer term usage – this table is taken from Page 20 of the Consultation Document for the permanent change which was shared with Newcastle on 6 Feb, with this point extracted and reiterated in the email from 9 May below – I hope this provides you with some longer-term reassurance regarding the total number of activations.

The analytical modelling we completed as part of the Stage 3 Gateway (using the STATFOR and NATS forecast) was conducted in the absence of any provided Commercial Operator Forecast – with the associated analysis suggesting that the maximum number of Newcastle impacted flights per activation being no higher than 5 (based on 2023 stats). I shared some analysis with you (email 21 Apr) using ADS-B Exchange based on the activations of the TDA in Sep '22 and Mar '23. This analysis showed that in Sep '22 - 78 Sqn provided a service iaw section A.3 of the Letter of Agreement to 3 Newcastle movements to/from the Copenhagen boundary. During the Mar '23 activations 78 Sqn provided a service to 1 Newcastle movement routing inbound from the Copenhagen boundary. The Letter of Agreement refers to aircraft routing TOWTE-IDDEC-BAZNA (or the reverse via the Copenhagen Boundary) and not purely filing direct TOWTE for the South-East and cutting the network corner using derogated services – these are independent issues with the CAA stating as such in their Operational Assessment on 15 Jun 22.

The CAA through CAP1616 have approved temporary activations provided we engage appropriately which is what we have done throughout the period identified within CAP2362.

We mentioned the issue of Pennine Radar in our MS Teams chat on 12 April. The DAATM participant recommended that Newcastle commence engagement with the CAA regarding this issue as it is outside the scope of the ACP (as determined by the CAA on 15 Jun 22).

Paras A.2.7 (and beyond) of the signed Letter of Agreement reference the requirement for a robust ingress and egress plan to the danger area. These known routes provide a level of assurance and predictability regarding exercise traffic as they transit towards TDA597. The Letter of Agreement requires military participants carry sufficient fuel to recover without transiting Newcastle Controlled Airspace and we

have developed this further based on your feedback from 31 Mar 23; we have written to Draken (5 Apr 23) advising that they avoid calling Newcastle for a service and remain entirely with either 19/20 or 78 Sqn. It was my understanding that no MOR was filed and this was an observation from Newcastle. At every stage, during and after activations we review any incidents and look to further mitigate against potential future events.

Safety of Ex participants and other airspace users is of the utmost importance: prior to flying as part of the exercise all participants must complete a mandated F2F brief, there are strict Ex rules, there is a mandated brief prior to each serial, all assets are subject to command and control by either 19/20 Sqn/airborne C2 and the Air Boss/Mission Support Officer monitors the Ex in real time to ensure that safety is maintained throughout. Please do not hesitate to share any tangible safety evidence, so we can continue to further develop the Letter of Agreement and those operating procedures employed.

Thanks again

[REDACTED]

[REDACTED] | SO2 A7 Training Enablers | HQ11 Gp | Air Command | Hurricane Block | RAF High Wycombe | Walters Ash | Bucks | HP14 4UE | [REDACTED] | Skype +443001583835 | Email: [REDACTED]

From: [REDACTED]

Sent: 07 June 2023 08:39

To: [REDACTED]

Subject: RE: TDA EG D597 Activation Request Amendment September 2023

Hi [REDACTED]

What extract do you refer to? I'm receiving increasing sounds of discontent from our airlines about the summer activations as they feel it will negatively impact their (and the travelling public) operations. The latest ACN for the Summer Ex being a good case in point.

In terms of your request for aircraft routing TOWTE that's not a simple answer as it's down to the airlines flight ops departments and their routings which can be impacted by ATC strikes in France, congestion through Europe and other airspace restrictions. In essence you are asking me to guess what the airlines will file as their plan. If that's the case then it could be assumed that 35% of routes in/out of NCL might well file this but I won't be held to this as a figure formally. That's really for you are the sponsor to ascertain by consultation with the airlines; has this happened?

My ongoing concerns have not changed, the lack of Pennine radar provision, the potential for congestion (and thus reduced safety) around the TDA, the increasing activities and changing dates/times, the uncoordinated and increased traffic associated with the Ex that the TDA is booked for around NCL and the behaviours of some of the Ex participants all make me very uneasy. Until MoD are able to properly and fully alleviate these concerns I'm not sure what can be done.

So far the taking of concerns in isolation (and treating the TDA as separate from the other elements that come with it) has been your viewpoint but I disagree entirely; a holistic approach must be the way ahead thus maintaining or improving safety and this is something I've not yet seen.

[REDACTED]