

Organisation / Stakeholder type (Q3-5)	Support Preferred Design Option (Q7-8)	Proposed Amendments/Mitigations (Q9)	Co-ordination Meetings (Q10-11)	Activation Season with Greatest Impact/Time with Least Impact (Q12-14)	Impact on operations below 7000ft AMSL (Q15)	Considerations for Letter of Agreement (Q16)	Any training/infra burden (Q17-18)	General Considerations (Q21-23)	Response may impact final proposal		Response does not change the final proposal	Change Sponsor Reasoning / Justification (You said, we did)	
									Impacted	Not Impacted			
1	Light Aircraft Association - NATMAC	Yes	Nil	1 Day Notice	Summer	Nil	Nil	Nil	Nil			X	NA
2	Dundee Airport Primary Stakeholder	No	The preferred design option does not take into account IFR departures off Dundee Runway 09. This will result in aircraft being restricted to 'not above FL80' which is below the level of P600 between EDONU and GLESK and below the level of N864 between ASNJD and PIPAR. Moving the Western boundary of the planned PDO airspace 10nm to the East would mitigate this issue. Adjusting the Preferred Design option to continue the straight line NNE from 56N, instead of dog-legging the airspace to follow the boundary of the Scottish TMA and N864 would mitigate the issue. Ensuring entry/exit points are published for Dundee departures would also mitigate the issue.  The preferred design option increases the risk of TCAS events for departures off Dundee Runway 09. Moving the Western boundary of the planned PDO airspace 10nm to the East would mitigate this issue. Adjusting the PDO to continue the straight line NNE from 56N, instead of dog-legging the airspace to follow the boundary of the Scottish TMA and N864 would also mitigate the issue. The response of 'any TCAS events should be reported' in STEP 2a(i) Options Development Version 2 does not mitigate the issue.  The IAFs OSVIB and IBVIM for RNP runway 27 lie directly beneath the PDO. This could affect the descent profile of aircraft inbound to OSVIB and IBVIM. Moving the Western boundary of the planned PDO airspace 10nm to the East would mitigate this issue. Adjusting the PDO to continue the straight line NNE from 56N, instead of dog-legging the airspace to follow the boundary of the Scottish TMA and N864 would mitigate the issue. Ensuring entry/exit points are published for Dundee inbounds would also mitigate the issue.	1 Month Notice	Summer  Between 2100 - 0630 local times	The Preferred Design Option does not take into account IFR departures off Dundee Runway 09. This will result in aircraft being restricted to 'not above FL80' which is below the level of P600 between EDONU and GLESK, and below the level of N864 between ASNJD and PIPAR.  The Preferred Design Option increases the risk of TCAS events for departures off Dundee Runway 09. The response of 'Any TCAS events should be reported' in STEP 2a(i) Options Development Version 2 does not mitigate the issue.  The IAFs OSVIB and IBVIM for RNP runway 27 lie directly beneath the Preferred Design Option. This could affect the descent profile of aircraft inbound to OSVIB and IBVIM. The current subjective assessments appear to have included only the VFR Significant Area of Interest for Dundee	FBZs will not be introduced for flight planning via P600 between EDONU and GLESK, or for N864.  If the airspace is not revised to mitigate the increased risk of TCAS events for departures off Dundee Runway 09, the proposed Letter of Agreement (LoA) between Dundee and the MOD must include the wording 'Any TCAS events will be reported'  The proposed LoA, between Dundee and the MOD, must ensure entry/exit points are published for Dundee departures and arrivals  The LoA between Dundee Airport and Leuchars Station must be revised to ensure Leuchars LARS provision during Special Use Airspace activation. Leuchars LARS is currently not 24 hours provision	MATS2 procedures would require revision  The LoA between Prestwick Centre and Dundee (HIAL) will require revision  The LoA between Dundee ATC and Leuchars Station will require revision	The following being included in the Dundee MOD LoA, and a revision of the current Dundee-Leuchars LoA, would mitigate opposition to the current airspace design:  FBZs will not be introduced for flight planning via P600 between EDONU and GLESK, or for N864.  If the airspace is not revised (as suggested in question 9) to mitigate the increased risk of TCAS events for departures off Dundee Runway 09, the proposed Letter of Agreement (LoA) between Dundee and the MOD must include the wording 'Any TCAS events will be reported'  The proposed LoA, between Dundee and the MOD, must ensure entry/exit points are published for Dundee departures and arrivals  The LoA between Dundee Airport and Leuchars Station must be revised to ensure Leuchars LARS provision during Special Use Airspace activation. Leuchars LARS is currently not 24 hours provision	X			The Sponsor met with Dundee Airport Limited on 4 April 2023 in order to discuss the points raised as part of this Consultation. Change Sponsor responses can be found included as an Annex to the Stage 3D Categorisation of Responses Rationale.  It was confirmed that Dundee do not publish SIDs and that any departure is either transferred to Leuchars or Scottish Control usually passing 3000 feet - Dundee could not advise if departures from RW09 are required to stop their climb when transferred to the next control agency.  The Sponsor requests the percentage of IFR departures from RW09 to inform the Options Appraisal (Final) and will model these movements against activations under ACP-2021-048.  The Sponsor advised that the lateral dimensions of the preferred design option cannot be reduced by 10nm due to the airspace requirements of the exercise participants.  Any TCAS event from RW09 against the activation of ACP-2021-048 to be shared with the Sponsor.  The Sponsor requests the percentage of arrivals to RNP RW27 to inform the Options Appraisal (Final) and will model these movements against activations under ACP-2021-048.  The Sponsor requests the dates of any significant local activity that is likely to cause a vast increase in traffic levels to Dundee Airport.  Dundee requested to consider any period of quieter movements that may allow for activation of the preferred design option during Dundee operational hours.  A FBZ will not be introduced between EDONU and GLESK.  Leuchars advised that a LARS can only be provided during the hours agreed within the Letter of Agreement held with Dundee, but on occasion night flying at Lossiemouth may extend this service.
3	Borders Gliding Club, Milfield - Primary Stakeholder	Yes	Nil	6 Month Notice	Autumn  Weekday mornings	Nil	Reporting points and altitude bands	There would be a major impact on the operation and future viability of the Borders Gliding Club at Milfield.  A significant proportion of the income that is raised to support gliding operations from Milfield is raised from the Expedition and Flying Weeks that are held during the Spring and Autumn when meteorological conditions provide the opportunity for pilots to soar up to FL195 (and FL240 with permission from ATC) over the Cheviot Hills. Glider pilots from all over the UK recognize Milfield as being one of the best gliding sites in the UK for these conditions. Typically they visit for 7-10 days and this provides a substantial income to the local economy	Mutual co-operation and co-ordination is essential to avoid future disruption and conflict with Borders Gliding Club operations.  Since the introduction of EG TDA597 this has worked well.			X	The Sponsor acknowledges the importance of the activity at Borders Gliding Club Milfield and the associated revenue generation from the Expedition and Flying Weeks that are held during certain periods.  Effective lines of communication have been generated by the Sponsor and Borders Gliding Club during previous activations under ACP-2021-048. The Sponsor has met the 6 month notice period requirement from the Stakeholder and envisages no reason as to why this notice period should not continue.  The majority of historic activations have been scheduled to coincide with periods of least disruption for the Stakeholder (weekday mornings).  The Sponsor notes that TRA(G) Northumbria Area North (between FL195 and FL240) will not be available when the preferred design option is active and therefore the addition of reporting points and altitude bands to any Letter of Agreement does not offer any benefit to either user
4	Newcastle International Airport - Primary Stakeholder	No	While we are supportive of the MoD's need for training we feel there are other, less utilised airspace blocks that should be considered. We also feel there is potential for mission creep and more use of this airspace over time. No assurances or guarantees have been forthcoming to guarantee the maximum hours of use per year/month. We have aspirations for a ACP to the SE of NCL in the future with sustainability goals but this PDO would limit this.	6 months Notice	Summer  Between 0300 - 0530 local times	Agreed, outside controlled airspace	Guaranteed availability of Pennine Radar Task Nil CAS crossing by all Ex traffic through the NCL CTR Formal entrance/exit gates from the DA Lesser activation times Restriction of Ex traffic to the confines of the DA (in all dimensions)	Permanent Radar Map Updates (£15K) Amendment of training guides (£10K) Simulator updates (£10K)	Does not account for the free routing of NCL commercial traffic. Up to 1T of CO2 added per flight.	X			The Sponsor met with Newcastle International Airport on 12 April 2023 in order to discuss the points raised as part of this Consultation. Change Sponsor responses can be found included as an Annex to the Stage 3D Categorisation of Responses Rationale.  The Sponsor did investigate the expansion of other Danger Areas, however these were discounted. This detail can be found at the Stage 2 Initial Options Appraisal and Safety Assessment.  During a Consultation meeting with Newcastle on 12 April 23 it was discussed that Newcastle peak traffic times were 0600, 1400 and 0000UTC we therefore hope that we can agree mutually convenient timings for activations based on the 6 month notice requirement from the Stakeholder.  Confirmed position that the Preferred Design Option does not impact Newcastle Traffic below 7000ft AMSL.  The CAA ruled that a lack of Derogated Radar Services exists beyond this ACP and that alternate measures are already in place (15 Jun 22).  Page 20 of the FCA Stage 3 Consultation Document details the requested frequency of activations for the Danger Area.  We understand that Newcastle may have aspirations for their own ACP, however a timeframe for the commencement of this work has not been detailed - therefore planning around this aspiration is not possible and is outside the scope of this ACP.  The Sponsor will employ (whenever operational considerations allow) a 6 month notice period for any planned activations of the preferred design option.  The Letter of Agreement will request that robust Ingress and Egress plans for all participants are devised, with ATS providers appropriately configured to meet levels of demand.  It is also in the interest of the Exercise Traffic to remain within the confines of the Danger Area, routine ATM procedures will be applied to aircraft that manoeuvre outside the Danger Area.  The Sponsor has assessed the associated environmental impact to Newcastle with specific detail provided at Page 23 of the Stage 3 Consultation Document. Sponsor requested (20 Apr 23) traffic forecast from Newcastle in order to better understand the Newcastle claim of 'up to 1T of CO2 added per flight'.

5	NATS - NATMAC	Yes	Nil	6 months Notice	Spring and Summer	Nil	<p>It would be useful to include more analysis on FBZ options within the ACP. There is no detail or analysis on FBZ options within the consultation. Agreements should be in place to minimise impact on traffic flows through extant agreements. Agreement on Airspace management e.g. if this area is active, the cumulative effect of other activated areas within the FIR. NATS would expect that the reporting points used within the UK AIP Sup for previous trial activations to be included within the UK AIP ENR 4.4 on a permanent basis as part of the MODs ACP, in order to facilitate re-routings associated to activations.</p>	<p>The AMC would be managing additional airspace and applying additional ASM protocols. Minor training and workload increase. Updates to systems and documentation, operational training and currency. Costs can be provided once the Impact Assessment has been completed.</p>	<p>To make the Airspace more efficient, we should be seeking to segment the airspace structure and therefore not activate the whole area when it is not required. The analysis does not show the impact of TDA597 on the network when D323 &amp; D613s are not active. The analysis assumes that they will always be active, but this is not always the case. It would be useful to include a scenario where no SUA is active to more accurately reflect the impact of this proposal. This is likely to be relevant if LFE are conducted during periods when the MDAs are unavailable for booking, most notably during weekends. If the intent is not to activate TDA597 on the weekends this should be stated in the document. NATS would request that any name change to the Danger Area designator i.e. Temporary Danger Area EGD597 to EGD777 is provided in sufficient time to update both NATS internal systems and the EUROCONTROL flight planning system in line with the AIRAC process prior to implementation. NATS welcomes the inclusion of the LOA associated to the trial activations within the ACP material and notes the MODs commitment to use this as a benchmark upon which future arrangements would be based. Such agreements mitigate as far as practicable, the impact associated to activation of the proposed area whilst also assuring ATS provision to affected commercial aviation primarily operating to/from Newcastle and Teesside airports. Standard ASM process requires the airspace reservation request by 0900 D-1. We would request as much notice of any exercises as possible (6 months plus) in order to support our long-term operational planning (activation notification as standard at D-1.</p>	X		<p>To minimise impact on the North Atlantic Tracks significant notice of proposed activations will be provided to the stakeholder. Activations will occur as informed by procedures associated with ACP-2021-048 and implemented by the AMC. Stakeholder to provide the Sponsor with information regarding peak traffic flow timings with a focus on North Atlantic Tracks.</p> <p>The FBZ for the preferred designed option was created in direct consultation with NATS, with the previous MII AIP dimensions of a 5nm FBZ deemed sufficient - this buffer size is proposed in order to allow for High Energy Manoeuvres in close proximity to the boundary.</p> <p>The AMC would be responsible for managing any perceived cumulative airspace effects from other activated areas.</p> <p>Previous trial activations under ACP-2021-048 would be used to inform the AIP ENR 4.4 entry and this will align with AIRAC 02/2024.</p> <p>The naming convention for the design option and descriptive suffix is required for ENR 5.1 entry.</p> <p>The entirety of the preferred design option is currently required in order to support Large Force Exercises - segmenting this structure into smaller areas will not provide a Danger Area suitable to provide segregation to current participating aircraft and therefore safety will be compromised.</p> <p>Given the scale of effort required in order to generate the Large Force Exercises, the preferred design option will only be activated on weekdays. Statistics obtained from the Military Airspace Manager prove that the Danger Areas (D323 and D613) were active every weekday (discounting Bank Holidays and Seasonal Stand Down periods). Therefore the environmental analysis that has been conducted is a fair and accurate reflection.</p> <p>A decision from the CAA is expected mid-Nov 23 regarding Future Combat Airspace, with AIRAC 02/2024 identified. The plan would be to use the preferred design option for the first time in February 2024.</p> <p>The framework LoA from ACP-2021-048 will be used to inform the subsequent agreement associated with ACP-2020-026.</p> <p>The Sponsor will employ (whenever operational considerations allow) a 6 month notice period for any planned activations of the preferred design option.</p>
6	Warton - Military Stakeholder	Yes	Nil	1 Day Notice	Nil	Nil	<p>Limited training requirement - costs not available</p>	<p>With the onset of emerging technologies in respect of platforms and weapons systems, it is impossible at this stage to comment on whether the proposed airspace is suitably future proofed. However it is recognised that competing demands for airspace between civil and military organisations require compromise and this would appear to have been met. With regard to airlines being able to take full advantage of FRA, we would say that the establishment of any airspace of such a size would preclude full use of FRA protocols, particularly when other airspace restrictions also impact on such protocols.</p> <p>It is not clear from the proposal whether any activation of the proposed airspace will result in other military assets having to migrate to airspace over the Irish Sea where BAE Systems Warton test and development activity takes place.</p> <p>Further to our observation that GAT might not be able to make full use of FRA, we would be interested 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 Irish Sea? In order to safeguard flying activity, BAE Systems proposed to establish SUA over the Irish Sea, this is very much at the embryonic stage.</p>	X		<p>Page 19 of the Consultation Document details Operating Principles for the preferred design option and specifies that the Danger Area will only be activated as and when absolutely necessary.</p> <p>Given the mass required to generate the Large Force Exercises it is highly unlikely that other military assets will migrate over the Irish Sea - Air assets will be prioritised to support any exercise in the preferred design option.</p> <p>The Sponsor used ADS-B Exchange to understand if network traffic would be displaced to a routing over the North Sea. Modelling against ACP-2021-048 activations the Sponsor confirmed that network traffic routing mirrored that of the trajectory in the NATS environmental assessment, with no significant deviation towards the Irish Sea.</p>	