ACP-2020-024 E-7 Wedgetail Operating Areas



STAGE 3
ENGAGEMENT STRATEGY
V2.0



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.

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Project Lead		ISTAR FHQ SO2 E-7
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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	
V2.0	Document rewrite	Project Lead	Rewrite following CAA feedback to V1.0

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Glossary of terms

ACC Air Control Centre	
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ACP Airspace Change Proposal	
AEW Airborne Early Warning	
AIRAC Aeronautical Information Regulation and Control	
ATC Air Traffic Control	
ATS Air Traffic Service	
BGA British Gliding Association	
CAA Civilian Aviation Authority	
CAP Civilian Aviation Publication	
CTA Control Area	
DA Danger Area	
DAATM Defence Airspace and Air Traffic Management	
DP Design Principle	
FHQ Force Head Quarters	
FIR Flight Information Region	
FL Flight Level	
GA General Aviation	
ISTAR Intelligence, Surveillance, Target Acquisition and	
Reconnaissance	
NATO North Atlantic Treaty Organisation	
NATS National Air Traffic Services	
NERL NATS En Route plc	
NM Nautical Mile	
MAA Military Aviation Authority	
MAUWG Military Airspace Users Working Group	
MoD Ministry of Defence	
RAF Royal Air Force	
SoN Statement of Need	
TRA(G) Temporary Restricted Area (Gliding)	
UIR Upper Information Region	

Introduction

This document forms part of Stage 3 of the Airspace Change Proposal ACP-2020-024, which seeks to secure suitable non-segregated airspace to operate the E-7 Wedgetail aircraft.

Statement of Need.

Currently the E-3D Sentry AEW Mk 1 utilises the UK Airborne Early Warning (AEW) areas for UK training and operations. In 2023 the E-7 AEW 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 racetracks. 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.

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.
- The defined areas will allow interaction on the National Air Traffic Systems (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 nondeviating status, which is similar to how the E-3D operated.
- The levels required for the areas will be fully contained in Class C airspace.

The CAA accepted the Sponsor's submission at the Stage 2 'DEVELOP AND ASSESS' Gateway on 17 April 2023 and redacted versions of all submission documentation can be found on the CAA ACP Portal¹.

Following a review of the CAP1616 airspace change process, the CAA issued version 5 of CAP1616, which was implemented on 02 January 2024. The Change Sponsor was informed that this ACP has subsequently been reallocated from a Level 2c to a Level 3

¹ Airspace change proposal public view (caa.co.uk)

(low impact ACP) as of <u>02 January 2024²</u>, and should follow guidance set out in <u>CAP</u> 1616 Version 5³.

The aim of this document is to demonstrate to the CAA and stakeholders that a Targeted Engagement strategy satisfies the requirement for engagement for a Level 3 submission of the CAP1616 airspace change process. It will provide transparency and consistency to the approach, and to help the engaged community understand how the Change Sponsor has approached this aspect. This engagement strategy forms part of a wider submission that will be sent to the CAA, before Stage 3 'ENGAGEMENT' commences with targeted stakeholders. This is planned to occur over a reduced 6-week period commencing on 3 June 24 due to there being only two identified external stakeholders; NATS En Route plc (NERL)⁴ and the British Gliding Association (BGA).

CAP 1616f⁵ provides 'best practice consultation/engagement principles and a foundation format' for this document. This document will include the following chapters:

- Summary of engagement activity undertaken to date. This section will summarise all engagement that has been conducted throughout Stage 1 and 2 whilst adhering to CAP 1616 V4.0.
- **Audience.** This will outline the stakeholders identified based on their impact (either positive or negative) or perceived interest in the proposal.
- Approach. This will detail the methods the Sponsor will use to inform stakeholders and provide a timeline of engagement activities.
- **Materials.** This will detail what products will be created to enable stakeholders to provide informed responses. Specifically, it will outline the different materials that are to be developed to make the information as assessable to a range of audiences.
- **Length.** This section will propose the start and end of the engagement period.

² Email dated 12/12/2023: ACP-2020-024 E-7 Wedgetail Airborne Early Warning Mk1 Orbit Areas Change - CAP1616 V5 Transition Arrangements

³ The processes for conducting Level 3 Airspace Change Proposals and Pre-Scaled Airspace Change Proposals are contained <u>in CAP 1616h – Guidance on Airspace Change Process for Level 3 and Pre Scaled Airspace Change Proposals</u>

⁴ NERL are the single POC representing NATS for the ACP, acting as conduit for engagement across all applicable NATS departments

⁵CAP1616F: Guidance on Airspace Change Process for Permanent Airspace Change Proposals | Civil Aviation Authority (caa.co.uk)

Objectives

The Change Sponsor aims to demonstrate effective targeted engagement by means of compliance with the Gunning principles⁶ below:

- 1. Engagement should occur when proposals are at a formative stage.
- 2. The engagement should give sufficient reasons for any proposal to permit intelligent consideration.
- 3. The engagement should allow adequate time for consideration and response.
- 4. The product of engagement must be conscientiously taken into account.

The Sponsor is seeking to meet all these principles when developing the engagement strategy and to maintain a dialogue with its targeted stakeholders to ensure meaningful feedback is gathered.

The following high-level objectives will underpin the development of the engagement strategy:

- Material must be as accessible as possible for all stakeholders. This includes different types of material as well as different methods of delivery and dissemination (physical or virtual). Unless requested otherwise, the Sponsor will deal directly via MS Teams/Email with NATS and the BGA who were identified as the targeted Stakeholders at Stages 1 and 2. All records/issues raised with these organisations during the ENGAGEMENT phase will be circulated to the stakeholders via Email for transparency and openness.
- Information is presented in a jargon-free way and is accessible to targeted Stakeholders. The Stakeholders will likely be conversant with most of the aviation terminology; a comprehensive Glossary should cover all other eventualities.
- Engagement is long enough to ensure that all stakeholders have had a chance to respond. This is particularly pertinent for organisations who may not meet irregularly and will not be able to respond quickly.

These principles will ensure that engagement is thorough, reaches the identified audience and employs the correct methods of engagement to generate valuable contributions that will aid in the development of the proposal.

Additionally, the Sponsor has used the most up-to-date and credible data available within the engagement documentation. This includes open-source data and the latest CAA aeronautical charts.

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⁶ CAP 1616F, 4.23 and 4.24 refers.

Summary of Engagement Activity Undertaken to Date

Engagement has been undertaken throughout Stages 1 and 2 of this Airspace Change Proposal (ACP). The table below summarises the activity to date⁷.

ACP Stage	Engagement Activity Summary
1A	A SON was submitted to the CAA and uploaded to the Portal. The SoN articulates the requirement to facilitate E-7 Wedgetail operating areas.
1B	Stage 1B saw the Sponsor propose and then engage on a set of Design Principles (DPs). The purpose of the DPs are to agree a criteria that airspace design options must be judged against. The draft DPs were sent to stakeholders and feedback sought.
2A	Stage 2A saw the development and assessment of several airspace change options. Engagement was sought on the initial options in the Options Development documentation which was sent to stakeholders for comment.
2B	As part of Stage 2B the Sponsor compiled a document set that formed part of the Options Appraisal. This included an Environmental Assessment and Safety Assessment. This also assessed the airspace option against a baseline 'do nothing' situation and outlined the relative differences in impact on each option (both positive and negative).

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⁷ All documents referenced can be found at the bottom of the ACP page on the CAA ACP Portal: https://airspacechange.caa.co.uk/documents/download/2039:

Section 1 - Audience

- 1.1 The sponsor believed that there was a case for limited stakeholder involvement at Stages 1 and 2 of the ACP. The only external stakeholder was identified as NATS with the MOD being informed and engaged with via the Defence Airspace and Air Traffic Management (DAATM) organization. The Sponsor intends to continue engagement with NATS throughout the Stage 3 ENGAGEMENT process.
- 1.2 The Sponsor had not initially considered the BGA to be an interested party in this ACP as the base height of all the proposed E-7 operating areas was Flight Level (FL) 270. However, there are two Temporary Reserved Areas (TRA) (Gliding) in Class C airspace just south of RAF Lossiemouth in the vicinity of one of the operating areas, with vertical limits Surface to Unlimited (Scottish Areas North and South). Whilst gliding in these areas above FL290 will be infrequent, the Sponsor will engage with the BGA throughout Stage 3. Email correspondence with the BGA was initiated in February 2023. It is expected that BGA will act as an intermediary to respond on behalf of their members.
- 1.3 In creating a stakeholder list at Stages 1 and 2, the Sponsor considered all who may be impacted (positively, negatively and potentially impacted) as well as those that may just have an awareness or interest in the change proposal, including seldom-heard stakeholder groups. It was assessed that, with the exception of NATS, the MOD and the British Gliding Association (BGA), this ACP would have no impact on other stakeholders, in summary:
 - Air Navigation Service Providers (ANSP) any impact is expected to be covered by NATS acting as the umbrella organisation and include Prestwick Air Control Centre (ACC) covering the Prestwick Upper Information Region (UIR; Swanwick ACC covering the London UIR; Shanwick Oceanic Control Centre covering the Shanwick Oceanic Flight Information Regions and Control Areas (FIR)/CTA). Impact likely to be negative as amendments to routings will be required but extensive engagement should reduce this to a minimum.
 - Eurocontrol The Sponsor had discussions with Eurocontrol during Stage 2 regarding the impact of the ACP on flow control to/from Europe⁸. Eurocontrol advised that any modelling on flow control would be impractical to achieve as the areas are non-segregated and would simply be subject to daily tactical management by ATC as per the extant E-3 areas. Eurocontrol are considered an interested party, but the ACP is likely to have neutral impact.
 - NATO E-3A community NATO E-3A operations in extant UK E-3 areas will
 continue until 2035. The co-ordination of any E-7 and E-3 areas being activated
 on the same day will continue to be managed by the Quarterly E-3/E-7 NATO
 Planning meeting and Weekly NATO co-ordination meetings. These meetings
 are attended by the Intelligence, Surveillance, Target Acquisition and
 Reconnaissance Force Headquarters (ISTAR FHQ) as the MOD representative.

⁸ Email 12 Aug 2022 and meeting held 29 September 2022.

This ACP is likely to have a positive impact as planning and co-ordination can be achieved in advance of flying operations.

- General Aviation (GA) community The majority of the GA community will not be impacted due to the proposed E-7 operating levels (FL270 FL350) being within controlled airspace. However, gliders may be infrequently impacted within the Temporary Reserved Area (Gliding) (TRA (G)). This will likely have a negative impact on them but an amicable agreement of shared use of the airspace is anticipated following engagement to date with the BGA.
- MoD This ACP will have a positive impact on the MoD as the E-7 will be able to operate in pre-planned optimal locations to conduct its various operational, training, and mandated defence tasks.
- Airlines No impact as the proposed airspace is not segregated. Any conflictions
 will be managed tactically by ATC as per the extant procedures regarding the
 activation and operation of the current E-3 operating areas.
- Aerodromes No impact as proposed E-7 operating levels (FL270 FL350), are well above the operating heights of aerodromes and their associated airspace.
- Local communities Expect to see no change to localised noise or air pollution due to operating levels (FL270 – FL350). Neutral impact.
- Environmental stakeholders No impact with regard to noise, negligible increase
 in CO₂ emissions and fuel burn due to tactical management by ATC as per the
 extant procedures regarding the activation and operation of the current E-3
 operating areas. It is also anticipated there will be no effect on air quality,
 tranquillity and biodiversity as this proposal does not impact airspace below 7000
 feet.
- In response to previous CAA feedback⁹, the Change Sponsor has not specifically identified any seldom-heard stakeholder groups iaw direction given in CAP 1616h. This Level 3 ACP only targets aviation stakeholders.
- 1.5 MOD stakeholders were identified by Defence Airspace and Air Traffic Management (DAATM) through the Military Airspace Users Working Group (MAUWG) contact list.

Internal MoD Stakeholders (*via DAATM)			
HQ 1 Group*	11 Gp A7*	NATO E-3 Force ¹⁰	
Military Aviation Authority (MAA)*	Defence Airspace and Air Traffic Management (DAATM)	Swanwick Military ATC (78 Sqn)*	

¹⁰ Liaison and co-ordination via ISTAR FHQ

⁹ At initial Stage 3, when the ACP was a Level 2 ACP, iaw CAP 1616 V4.0

Section 2 – Engagement Approach

Notification of Engagement

- 2.1 To ensure that all impacted stakeholders can suitably participate in the engagement process, notification of engagement will be via targeted emails and/or MS Teams meetings.
- 2.2 The following methods of notification will be applied:
- 2.3 Existing stakeholders will be notified of engagement via email. This email will provide stakeholders with the engagement material, start and finish dates, as well as the methods of responding. Additionally, if necessary, reminders to provide feedback will be sent to stakeholders two weeks prior to the engagement end date.

Methods of Engagement

2.4 Targeted Stakeholder Engagement was agreed at Stages 1 and 2. As this is a Level 3 ACP with all targeted stakeholders already engaged, the Sponsor envisages all forthcoming engagement will continue to be electronic. However, if requested, face to face forums, postal correspondence (via the address below) or any other means of preferred communication may be accommodated.

All documents will be uploaded to the CAA Airspace Change Portal.

- 2.5 Engagement responses are via email (both addresses) to the Project Lead:
 - Email:

Air-1Gp-ISTAR-E7Wegetail@mod.gov.uk

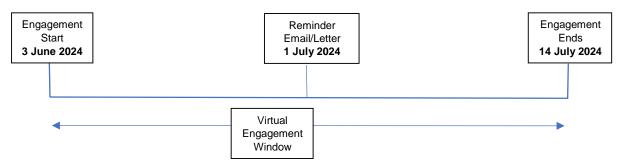
Letter: FAO:

ISTAR FHQ
Atlantic Building
RAF Lossiemouth
Lossiemouth

Moray IV31 6SD

Targeted Engagement Timeline

2.6 The engagement timeline can be found below. Dates are based on the proposed start-date of 3 June 2024, making sure stakeholders have sufficient time to receive and, if necessary, promulgate material to others before commencing direct engagement. Virtual events will be arranged and planned should stakeholders require them up until the engagement end date.



Section 3 – Material

Engagement Documentation

- 3.1 The following documentation will be presented for stakeholders to read:
 - Engagement Document. The main document will provide a comprehensive breakdown of the airspace option as well as background information on the ACP. The targeted stakeholders should be able to understand how the sponsor selected the preferred option. They should also be able to digest and assess how this ACP impacts their airspace/operations either positively or negatively and how to provide feedback to the proposal. As a result of continual engagement throughout the process the sponsor anticipates minimal feedback that can be addressed within a shortened 6-week engagement window. It will also include a glossary of terms.
 - Full Options Appraisal Phase II (FOA). Whilst this is no longer a requirement for a Level 3 submission, the Sponsor produced a FOA prior to the transition from a Level 2c submission. This will be available for targeted stakeholders to read should they wish to digest more technical detail and will form the basis of the Stage 4 submission in due course. It will also include a glossary of terms.

Online Portal

3.2 Stakeholders can refer to all Stage 1, 2 and 3 documentation via the CAA Portal.

Physical Material

3.3 Hard copies of all engagement documentation can be requested from the Change Sponsor via the contact details below:

Postal address:

Letter FAO:

ISTAR FHQ
Atlantic Building
RAF Lossiemouth
Lossiemouth
Moray
IV31 6SD

Email:

Air-1Gp-ISTAR-E7Wegetail@mod.gov.uk (please send to both addresses)

Section 4 - Engagement Period

4.1 The Sponsor proposes to conduct a 6-week targeted engagement process. Whilst a 12-week process is the accepted standard for permanent ACPs, engagement with NATS has been ongoing from the commencement of the ACP with frequent meetings throughout 2023. The Sponsor believes that the engagement with NATS thus far will ensure only minor amendments to the submission which can be dealt with in an expeditious manner. Input from the BGA is likely to only affect one of the 21 proposed E-7 areas (D1) so engagement can be focussed on this site. Should any unforeseen events identified by a stakeholder require detailed investigation and prolonged engagement the Sponsor is in a position to extend the length of engagement out to 12 weeks (or beyond by mutual agreement).

Section 5 – Next Steps

Collate and review responses

- 5.1 On completion of engagement the Sponsor will review all responses and categorise them into those that may impact the ACP and those that do not. Analysis, categorisation, and the production of the Sponsor's updated submission will then be sent to the CAA for review.
- 5.2 All original responses will be analysed and sent to the CAA with a redacted version uploaded to the Portal (including raw data).

Stage 4 – Update and Submit

- 5.3 The Sponsor will consider whether, in light of feedback received during engagement, any of the airspace design option areas need significant re-design that would warrant further engagement with stakeholders.
- 5.4 Provided additional engagement is not required, the Sponsor will compile the final documents for submission in October 2024. This is to comply with the timeline agreed with the CAA for them to reach a decision in January 2025.

Stage/Step	Description	Gateway Date
3	Targeted Engagement Launch	3 June 2024
	Reminder to Stakeholders	1 July 2024
3	Collate and review responses from	14 July 2024
	targeted engagement.	
4	Produce submission	September 2024
4	Submit Airspace Proposal to the CAA	October 2024
5	DECIDE	January 2025
6	IMPLEMENT into AIRAC	May 2025