

## Annex A to ACP 2020-24 Dated 28 Nov 24

### Engagement Summary Report - ACP 2020-024 E-7 Wedgetail Operating Areas

1. As per CAP1616h the Change Sponsor is required to provide a summary report following the Stage 3 engagement period with stakeholders.
2. The Change Sponsor commenced targeted engagement with the MOD, NATS and the BGA on 3 June 2024. The engagement period was scheduled to end on 14 July 2024 but was extended to 31 July 2024 at the request of NATS to allow them sufficient time to conduct a comprehensive operational and safety review of the submission. Responses were received from all 3 stakeholders by 31 July 2024.

### Engagement Responses

3. The responses from the 3 Stakeholders were as follows:
  - **MOD**  
DAATM have engaged across Defence as requested and can confirm that the ACP is fully supported and there are no further issues or comments from across MOD.
  - **NATS**
    - The agreed level for E-7 operations will likely depend on multiple factors including, for example, time of day flows of civil air traffic. Whilst the engagement paper notes the ability to negotiate the area and level of operations by E-7 aircraft, this will need further development and inclusion in any required Letter of Agreement and ATC procedures.
    - Previous engagement presented that there are no increased separation requirements for operating E-7 aircraft, and that the aircraft is RVSM compliant. Our response is based on this i.e 1000ft vertical separation. Confirmation of separation required from the aircraft is required to validate our assumptions. If this is not the case, then further development may be required.
    - The position of some areas requires international letters of agreement for ATC procedures to be created or updated. At this time we don't anticipate any issues to follow.
    - Similarly, letter of agreements and procedures with the gliding community may be required to be updated.
    - Previous engagement indicated there may be a requirement to change the flight profile of the E-7 within an operating area (racetrack and figure of eight). Clarity of flight profiles within the orbit areas will be required to develop procedures for agreeing the E-7 operating level. Some civil sectors are more sensitive to Right Hand or Left-Hand orbits or figure of 8 orbits so NATS would like to be able to discuss this further so that procedures can be developed. For example, could NATS operations make a request for direction of orbits in conjunction with the operating levels.
    - Some areas may have constrained surveillance and comms cover; this will need to be considered in operational agreements.
    - There is a general consideration to be made regarding the cumulative effect of multiple, simultaneous activations of operating areas and other special use airspace (Danger Areas, Air refuelling areas etc). The squeezing of civil traffic and associated workload changes must be considered. There may be some areas that would benefit from more robust airspace management protocols and notification procedures (i.e. pre-tactical notification at D-1). F1 area and the D323 and D613 complexes and C1 and D712 for example.

- Should the CAA approve the implementation of the proposed operating areas for E-7, there will be a requirement to complete ATC assurance work. Any hazards or issues identified during this process would be notified to the MOD so that any mitigation or solutions can be put in place.

**BGA**

- I have reviewed the Stage 3 Engagement doc v2.0. As previously discussed, it is only racetrack D1 that is of some concern to the BGA as it is partially co-located with the Scottish TRA(G) complex. I note the text of para 1.8 and this is sensible and reasonable - in theory at least. My concern would be that "on the day" - the day being the very rare day when extremely high glider flights are possible - an air traffic controller might award a presumption of priority to the MoD and decline to allow gliders access to the TRA(G) above FL270 or 280 (buffer for FL290). I would therefore request that within the AIP notification of this area (D1) or wherever is appropriate, that there is a written presumption of priority for gliders, with the obvious caveats for emergencies or matters of national security.

4. The Change Sponsor would like to thank each of the stakeholders for their responses and will address the points raised below.

**Task Sponsor Response to Engagement**

**MOD**

5. The MOD is fully supportive of the ACP. As the operating areas are non-segregated in the London and Scottish UIRs and will be managed tactically on a daily basis other MOD (and USAFE) operators will coordinate their movements to deconflict as required. The feedback from the MOD had no impact to the final ACP.

**NATS**

6. The Change Sponsor held a post engagement meeting with NATS on 20 August 2024 to discuss each of the points raised by them. Several of the points will be addressed in the LOA between the MOD and NATS; the draft copy of this LOA is attached at Annex B<sup>1</sup>. A summary table of each discussion point is listed below:

	<b>NATS Comment</b>	<b>Change Sponsor Response</b>
1	The agreed level for E-7 operations will likely depend on multiple factors including, for example, time of day flows of civil air traffic. Whilst the engagement paper notes the ability to negotiate the area and level of operations by E-7 aircraft, this will need further development and inclusion in any required Letter of Agreement and ATC procedures.	The MOD Agrees. The MOD will work alongside NATS to ensure that the Letter of Agreement (LOA) clearly articulates the issue. Non-segregated airspace, E-7 flexibility to change height and location plus tactical control by ATC will be instrumental in success.

<sup>1</sup> LOA is updated Interface Document 8 (ID8) as agreed by NATS Policy in email dated 20 Sep 24 (Annex E).

	NATS Comment	Change Sponsor Response
2	<p>Previous engagement presented that there are no increased separation requirements for operating E-7 aircraft, and that the aircraft is RVSM compliant. Our response is based on this i.e 1000ft vertical separation. Confirmation of separation required from the aircraft is required to validate our assumptions. If this is not the case, then further development may be required.</p>	<p>The MOD can confirm that the E-7 Wedgetail AEW Mk1 is RVSM compliant.</p>
3	<p>The position of some areas requires international letters of agreement for ATC procedures to be created or updated. At this time we don't anticipate any issues to follow.</p>	<p>The MOD notes this point and formally request that NATS commences the process of LOA review. The MOD will assist and provide specialist input as required by NATS.</p>
4	<p>Similarly, letter of agreements and procedures with the gliding community may be required to be updated.</p>	<p>The MOD agrees. The MOD requests that NATS liaise with Prestwick ATC on how best to address deconfliction of gliding in TRA(G) Scottish South with E-7 operations in D1. The resolution will be included in the LOA and be articulated in the Civilian AIP.</p>
5	<p>Previous engagement indicated there may be a requirement to change the flight profile of the E-7 within an operating area (racetrack and figure of eight). Clarity of flight profiles within the orbit areas will be required to develop procedures for agreeing the E-7 operating level. Some civil sectors are more sensitive to Right Hand or Left-Hand orbits or figure of 8 orbits so NATS would like to be able to discuss this further so that procedures can be developed. For example, could NATS operations make a request for direction of orbits in conjunction with the operating levels.</p>	<p>The E-7 will fly racetrack patterns in long legs but will not be on the outer extremities of the proposed operating areas. The aircraft will effectively fly a straight leg in the centre of the area and "tear drop" at each end. The E-7 will comply with ATC instructions where necessary to ensure deconfliction. Orbit direction and direction of turns can be tactically agreed on the day of the flight and amended as required. There is negligible impact on the E-7 radar picture with respect to direction of orbit/turns.</p>
6	<p>Some areas may have constrained surveillance and comms cover; this will need to be considered in operational agreements.</p>	<p>The MOD agrees. 78 Sqn have not identified any issues, but the MOD proposes that such concerns are discussed in more detail at a NATS/MOD Table-top Exercise to prepare for E-7 operations.</p>

	NATS Comment	Change Sponsor Response
7	There is a general consideration to be made regarding the cumulative effect of multiple, simultaneous activations of operating areas and other special use airspace (Danger Areas, Air refuelling areas etc). The squeezing of civil traffic and associated workload changes must be considered. There may be some areas that would benefit from more robust airspace management protocols and notification procedures (i.e. pre-tactical notification at D-1). F1 area and the D323 and D613 complexes and C1 and D712 for example.	The E-7 will comply with ATC instructions to deconflict in high tempo environment. Tactical decisions based on Fast Jet weather considerations will often dictate operating location. A pre-note will be submitted by the E-7 crew 2 hours prior to departure to inform orbit choice. The MOD do not want to revert to a D-1 solution as this reduces flexibility and hinders operational effectiveness. There will be opportunities to test the areas during T&E to assist with the safety case.
8	Should the CAA approve the implementation of the proposed operating areas for E-7, there will be a requirement to complete ATC assurance work. Any hazards or issues identified during this process would be notified to the MOD so that any mitigation or solutions can be put in place.	The MOD notes this point and would offer all assistance necessary in this process.

**BGA**

7. The Change Sponsor is sensitive and in agreement with the BGA request that gliding in TRA(G) Scottish North and South should continue with priority being given to gliders v the E-7 unless emergencies or matters of national security dictate otherwise.

8. The MOD proposes amending the extant agreement<sup>2</sup> that states “gliding in the TRA(G) can occur at weekends and may be activated during weekdays to accommodate one Spring and one Autumn Mountain Wave festival subject to an associated published ACN and approval by the Prestwick Centre Operations Supervisor and 78 Sqn (Mil) North supervisor”. The new agreement is expected to follow a similar line.

9. The extant agreement covers legacy E-3D operations and ongoing E-3A operations out to 2035 in AEW operating area UK-9. The smaller proposed E-7 operating area D-1 predominantly sits within UK-9 so there should be little change to the ATC management of this airspace.

10. The MOD will continue to engage with the BGA and NATS to ensure the LOA is updated. A separate entry referencing priorities will also be published in the Civilian AIP.

**Conclusion**

11. The Change Sponsor has engaged with stakeholders throughout the Stage 2 and Stage 3 processes and as a result was pleased to note that there were no major concerns raised by them in their engagement responses. Other than the LOA amendments already mentioned the feedback has resulted in no changes to the existing design of the areas as proposed at Stage 3.

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<sup>2</sup> SWK LOA 029 dated 10/10/2023

Whilst there is ongoing work to be completed to ensure that the LOA between the MOD and NATS is drafted, circulated, and ultimately signed by both parties prior to Stage 5 the Change Sponsor is confident that the ACP can progress iaw the proposed timeline.