



East Anglia Hub Wind Farms

Engagement Summary Report

ACP-2023-079

Date: 18 March 2025

Author: [REDACTED]

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Harston Mill, Royston Road Harston, Cambridge CB22 7GG
01172 422533 / enquiries@ospreycl.co.uk
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Table of Contents

1	Background	6
1.1	Introduction	6
1.2	ACP Requirement.....	6
1.3	Engagement Summary Report.....	6
2	Engagement Requirements	7
2.1	Introduction	7
2.2	Engagement Strategy.....	7
2.3	Stage 2 – Design Principles Engagement.....	7
2.4	Stage 3 – Formal Engagement.....	8
3	Stage 2 – Design Principles Engagement	9
3.1	Introduction	9
3.2	Stakeholders Identification.....	9
3.3	Design Principles Engagement (Stage 2)	10
3.4	Engagement Responses (Stage 2)	10
4	Stage 3 – Formal Engagement	12
4.1	Introduction	12
4.2	Formal Engagement (Stage 3)	12
4.3	Engagement Responses (Stage 3)	13
5	Conclusions.....	16
5.1	Modification of Final Design	16
5.2	Next Steps.....	16
A1	List of Stakeholders	1-1
A2	Stage 2 Engagement – Notification	2-1
A2.1	Initial Engagement Email	2-1
A2.2	Mid-Engagement Reminder Email.....	2-2
A3	Stage 2 Engagement - Letter	3-1
A4	Stage 2 Engagement - Record.....	4-1
A4.1	Engagement Email Delivery Issues	4-6
A5	Stage 2 Engagement - Responses	5-1
A5.1	British Gliding Association Response.....	5-1
A5.2	CHC Helicopter Response.....	5-2

A5.3	British Helicopter Association Response.....	5-3
A5.4	Babcock Mission Critical Service Response.....	5-4
A5.5	NATS Response.....	5-5
A5.6	LNVL Response.....	5-6
A5.7	Osprey Response to LNVL Query.....	5-7
A5.8	LVNL's Response to Osprey's Correspondence.....	5-8
A6	SPR Website Campaign.....	6-1
A7	FAQs – Hosted on Airspace Portal.....	7-1
A8	Engagement Response Questionnaire.....	8-1
A9	Stage 3 Engagement – Notification.....	9-1
A9.1	Initial Engagement Email.....	9-1
A9.2	Mid Engagement Reminder Email.....	9-1
A9.3	LinkedIn Engagement Notification.....	9-2
A9.4	LinkedIn Engagement Reminder.....	9-3
A10	Stage 3 Engagement - Document.....	10-1
A11	Stage 3 Engagement – Record.....	11-1
A11.1	Engagement Email Delivery Issues.....	11-7
A12	Stage 3 Engagement – Response.....	12-1
A12.1	BGA Response.....	12-1
A12.2	BHA Response.....	12-2
A12.3	Norwich Airport Response.....	12-1
A12.4	CHC Helicopter Response.....	12-1
A12.5	ARPAS UK Response.....	12-1
A12.6	DAATM Response.....	12-6
A12.7	NATS Response.....	12-11
A13	Stage 3 LinkedIn Engagement Responses.....	13-1
A14	Stage 3 X Engagement Responses.....	14-1

Table of Tables

Table 1 - Summary of Stage 2 Responses	11
Table 2 - Summary of Stage 3 Responses	14
Table 3 - NATMAC Stakeholder List.....	1-2
Table 4 - Other Identified Stakeholders	1-3
Table 5 - Stage 2 Engagement Record.....	4-6
Table 6 - Stage 2 Engagement Email Delivery Issues	4-7
Table 7 - Stage 3 Engagement Record.....	11-6
Table 8 - Stage 3 Engagement Email Delivery Issues	11-7

1 Background

1.1 Introduction

Scottish Power Renewables Ltd (SPR) is the Change Sponsor (CS) for this Airspace Change Proposal (ACP) which is being conducted in accordance with Civil Aviation Authority (CAA) Civil Aviation Publication (CAP) 1616h¹, to support the construction of 3 wind farm sites in the southern North Sea, approximately 36km east of the East Anglian coastline. These wind farms will have the potential to deliver up to 3.1 GW of installed capacity, making it one of the largest offshore opportunities in the world.

1.2 ACP Requirement

SPR identified the need for this ACP following feedback received and documented during the associated Environmental Impact Assessment (EIA). The most notable concern, raised by National Air Traffic Services (NATS) was the impact of the EA Hub Wind Turbine Generators (WTGs) on the Cromer Primary Surveillance Radar (PSR). The WTGs may generate radar clutter on air traffic control (ATC) radar displays that would in turn affect the continued provision of Air Traffic Services (ATS) utilising the Cromer PSR. The ACP will consider options to successfully mitigate the identified concerns.

1.3 Engagement Summary Report

The purpose of the Engagement Summary Report is to document the stakeholder responses received during all engagement activities associated with all relevant stages of the ACP process. For this particular ACP, this includes stakeholder responses associated with development of design principles at Stage 2 as well as any views and concerns presented in responses elicited during the more formal engagement period at Stage 3. The document will also articulate how, if at all, the stakeholder engagement responses may have influenced the choice of the final design option(s).

¹ Guidance on Airspace Change Process for Level 3 and Pre-Scaled Airspace Change Proposals, dated November 2023.

2 Engagement Requirements

2.1 Introduction

Following the Stage 1 Assessment Meeting in January 2024², the CAA confirmed that this project would be conducted in accordance with the Level 3 pre-scaled ACP process described in detail in CAA CAP 1616h. This requires sponsors to undertake targeted engagement activity to capture relevant stakeholders' views, and to subsequently demonstrate that any views expressed have been fully considered and taken into account when designs are finalised ahead of the formal proposal submission to the CAA. The engagement activity was conducted over three separate stages as described in the paragraphs below.

2.2 Engagement Strategy

A comprehensive Engagement Strategy³ was developed to demonstrate to the Regulator that all the published engagement guidance had been fully considered in line with the requirements specified both in CAP 1616 and during the earlier Assessment Meeting held with the CAA on 16 January 2024. The Engagement Strategy was developed in line with the published Gunning Principles to ensure:

- Final decisions would not be predetermined.
- Sufficient information was available to stakeholders to ensure 'intelligent consideration'.
- Adequate time was allocated for consideration and response.
- Conscientious consideration would be given to all engagement responses.

2.3 Stage 2 – Design Principles Engagement

During the earlier Stage 2 work in May 2024, documented design principles were shared with key stakeholders as described in the Stakeholder Engagement document⁴. The document outlined the draft design principles developed for the East Anglia Hub Windfarm sites. In particular it described the inclusion of Mandatory Design Principles (MDPs) in accordance with CAP 1616h guidance. In addition to the MDPs the CS also developed three Discretionary Design Principles (DDPs) and three Bespoke Design Principles (BDPs).

The draft design principles were distributed amongst the identified stakeholders for feedback and comment, accompanied by supporting documentation to provide the necessary context. All details are included in previously published materials (Footnotes 2 and 3 below) and will be repeated in this Engagement Summary Document in line with the regulatory requirements.

² ACP 2023 079 Minutes of Assessment Meeting dated 16 January 2024, hosted on CAA ACP Portal.

³ ACP 2023 079 Engagement Strategy (72039 001 Issue 1 dated 22 October 24), Chapter 3 hosted on CAA ACP Portal.

⁴ ACP 2023 079 Design Principles: Stakeholder Engagement dated 15 May 2024, hosted on CAA ACP Portal.

2.4 Stage 3 – Formal Engagement

The engagement requirements were discussed during the 16 January 2024 Assessment Meeting. This meeting highlighted the requirement for an Engagement Strategy which was reviewed by the CAA, prior to regulatory clearance to proceed, and was published on 18 October 2024.

The Assessment Meeting Minutes highlighted the requirement to produce an Engagement Summary Report (this document) which sets out a summary of the feedback received through the engagement activities as well as a description of how the engagement activity may have influenced the final design.

3 Stage 2 – Design Principles Engagement

3.1 Introduction

For this ACP, the CS was obliged to follow the process described in CAP 1616h, Appendix B which sets out the pre-scaled process for a permanent airspace design change for the establishment of a transponder mandatory zone (TMZ) to mitigate the impacts of range and azimuth gating (RAG) applied to PSRs to prevent cutter caused by false returns from offshore wind farms. The consult/engage requirements are clearly laid out in this Appendix and have guided the CS through stakeholder identification, the selection of suitable engagement periods and the provision of appropriate notification and engagement materials.

Design principles engagement was conducted in line with the guidance above in late March 2024. In late October 2024 the more formal engagement period was launched. Full details of the activities across these two periods are included in the paragraphs below.

3.2 Stakeholders Identification

During the Stage 1 Assessment Meeting the CS identified the following organisations as those from which the key stakeholders would be identified:

- NATS⁵ as the main ANSP⁶ providing services in the airspace.
- MOD⁷ as a major operator and provider of services in the airspace.
- Norwich and Southend airports.
- GA⁸ operators and airfields.
- HEMS⁹ operators.
- Offshore helicopter operators.

Further guidance on stakeholder identification was provided by the CAA during the Assessment Meeting as well as a commitment to provide an updated National Air Traffic Management Advisory Committee (NATMAC) list prior to engagement commencing; the document provided was dated 8 January 2024. The full list of identified stakeholders was included in the Stakeholder Engagement document¹⁰.

Although the engagement targeted the stakeholders described above, the engagement was not exclusive to that list. Any individual or organisation from any geographical location could also submit a response that would be duly considered.

A full stakeholder list is included at Annex A1.

⁵ National Air Traffic Services Limited.

⁶ Air Navigation Service Provider.

⁷ Ministry of Defence.

⁸ General Aviation.

⁹ Helicopter Emergency Medical Services.

¹⁰ ACP 2023 079 Design Principles: Stakeholder Engagement dated 15 May 2024, hosted on CAA ACP Portal.

3.3 Design Principles Engagement (Stage 2)

The design principles 4-week engagement period was notified on 28 March 2024 and responses were requested by 25 April 2024. All notifications were sent by email to the key stakeholders described in para 3.2/Annex A2. In addition, an engagement reminder email was also sent on 12 April 2024. These emails are reproduced at Annex A2.

A supporting letter¹¹ was sent to the identified stakeholders at the start of the engagement period. This included an overview of the proposed airspace changes and links to ACP-2023-79 hosted on the CAA portal, where other supporting documentation could be accessed. It invited written feedback to be sent to the CS, as undersigned. This letter is reproduced at Annex A3.

During our initial email engagement with the stakeholders, listed in Annex A1, a small number of emails produced a nil return indicating a failed delivery. This could have been the result of several conditions, including an incorrect email address and or an invalid /decommissioned organisational email. The CS sourced an alternative email address via the respective organisational websites for each nil responding email. The engagement material was then resent to these email addresses for the attention of the original representative. All alternative emails are included in Annex A4 at para A4.1.

3.4 Engagement Responses (Stage 2)

A total of 6 responses were received during the design principles engagement period. All responses were submitted directly back to the original email sent at the beginning of the engagement period by the CS. Of these, none gave full support to the initial DPs; no stakeholders provided any DP development suggestions; five were indifferent about the ACP DPs; and one stakeholder sent a generalised ACP/DP query. No responses were received from other non-specified stakeholders.

In addition to the MDPs, DDPs and BDPs presented, no additional DPs were suggested by any of the stakeholders¹². It was therefore not necessary to change the DPs as initially presented.

A summary of the engagement responses can be seen in Table 1. For full details of the final response, please refer to Annex A5.

Stakeholder Response Email Ref	Organisation	Date	Response Received	Further Action
A5.1	British Gliding Association	28 March 2024	No Impact. No further comments.	No further action required until Stage 3. Response does not include relevant comments on additional/amended design principle development.
A5.2	CHC Helicopter	28 March 2024	No Impact. No further comments.	No further action required until Stage 3. Response does not include relevant comments on

¹¹ ACP-2023-079 (Osprey Ref 71951) CAP 1616 ACP-2023-079: East Anglia Hub dated 28 March 2024.

¹² ACP 2023 079 Design Principles: Stakeholder Engagement dated 15 May 2024, hosted on CAA ACP Portal.

Stakeholder Response Email Ref	Organisation	Date	Response Received	Further Action
				additional/amended design principle development.
A5.3	British Helicopter Association	11 April 2024	No Impact. No further comments.	No further action required until Stage 3. Response does not include relevant comments on additional/amended design principle development.
A5.4	Babcock Mission Critical Services	12 April 2024	No Impact. No further comments.	No further action required until Stage 3. Response does not include relevant comments on additional/amended design principle development.
A5.5	NATS	18 April 2024	No Impact. No further comments.	No further action required until Stage 3. Response does not include relevant comments on additional/amended design principle development.
A5.6	LVNL	29 April 2024	Possible impact. See email below. Response to follow.	No further action required until Stage 3. Response does not include relevant comments on additional/amended design principle development.
A5.7	Osprey to LVNL	30 April 2024	Reply to A4.6.	No further action required until Stage 3. Response does not include relevant comments on additional/amended design principle development.
A5.8	LVNL	30 April 2024	No further comments.	No further action required until Stage 3. Response does not include relevant comments on additional/amended design principle development.

Table 1 - Summary of Stage 2 Responses

4 Stage 3 – Formal Engagement

4.1 Introduction

As described earlier, an Engagement Strategy was developed in accordance with the requirements of the CAP1616h airspace change process (para 2.2). This document described the activities to be undertaken, the intended audience and the engagement approach to be followed. Alongside this a formal engagement document¹³ was produced that explains the potential options and provides technical details associated with each potential alternative. The document describes proposals for the introduction of the primary mitigation of Range Azimuth Gating (RAG) zones at the proposed development sites, alongside the secondary mitigation of Transponder Mandatory Zones (TMZs) around the proposed EA Hub Wind Farm developments. The Engagement Document also contained a copy of the response questionnaire, which stakeholders could download and print, or mail directly to the CS.

Both the Engagement Strategy document and the Engagement Document were sent to stakeholders and a dedicated email address was set up to allow stakeholders to ask questions or provide any other feedback regarding this ACP.

All documents from the previous stages of the airspace change process, can be found on the CAA Airspace Change Portal:

[EA Hub Wind Farms ACP Public View \(CAA\)](#)

4.2 Formal Engagement (Stage 3)

The 6-week formal engagement period commenced on Monday 28 October 2024 and closed on Sunday 8 December 2024. Notifications were again sent by email direct to key stakeholders as identified above. In addition, an engagement reminder email was sent on 29 November 2024 to remind stakeholders of the deadline for their response. These emails are reproduced at Annex A4.

An online campaign was spearheaded by the CS using their website and social media accounts. The campaign aim was to ensure this project was as widely publicised as possible, beyond just those aviators that might routinely fly around the planned development areas. This broad visibility was also intended to provide a channel into those harder to reach audiences that might have an interest and may also wish to express their views. The first posting was made on 28 October 2024 and a follow up message was published on 27 November 2024. The access page for the website is reproduced at Annex A6.

A Frequently Asked Questions (FAQs) document¹⁴ was developed as a living document for the duration of the engagement period. This document was hosted on the Airspace Portal and was planned to be updated periodically during and after the 6-week engagement period. The access page for this document is reproduced at Annex A7.

¹³ ACP-2023-079 (Osprey Ref 72039 002) East Anglia Hub Windfarm Engagement Document dated 20 August 2024.

¹⁴ ACP-2023-079 (Osprey Ref 72039 005) v1.0 dated October 2024

4.3 Engagement Responses (Stage 3)

Engagement responses were requested through the online feedback form (Annex A8). This form was available as a hard copy if required from within the engagement document and emailed directly to all identified stakeholders. Moreover, stakeholders were also offered the following alternatives as ways to access the response document and submit their replies:

- A link contained within the Engagement Document.
- A link posted on the SPR website.
- A link shared as part of a social media post on SPR pages.
- Postal feedback form.

Analysis of the social media posts following the 28 October post shows there were 4,425 impressions¹⁵ and 156 engagements¹⁶; an engagement rate of just over 3.5%. See Annex A12.

Analysis of the social media posts following the 27 November post shows there were a further 2,797 impressions and 99 engagements: a similar engagement rate of just over 3.5%. Annex A12.

Table 2 below provides details of responses received during the engagement exercise. The left-hand column provides the Annex location for the original email responses from each stakeholder. Seven responses were received in total and six of these required no further action to be taken because those responses either supported the introduction of the TMZs or felt that the TMZ location would have no impact on routine operations for members of their respective organisations.

Stakeholder Response Email Ref	Organisation	Date (2024)	Response Received	Further Action
A12.1	British Gliding Association (BGA)	25 October	No impact on gliding operations	No further action required
A12.2	British Helicopter Association (BHA)	28 October	No Objection	No further action required
A12.3	Norwich Airport	19 November	No impact	No further action required
A12.4	CHC Helicopter	3 December	No Comments, but agree Option 13 or 15 most appropriate	No further action required

¹⁵ This is the number of times a post has been viewed by other users.

¹⁶ LinkedIn Engagement Rate is the measurement that counts how many people have interacted with a page's post through likes, comments and shares.

Stakeholder Response Email Ref	Organisation	Date (2024)	Response Received	Further Action
A12.5	ARPAS UK	4 December	No comment	No further action required
A12.6	Defence Airspace and Air Traffic Management (DAATM)	5 December	Object on multiple grounds	Concerns noted and transferred to safety case for further assessment
A12.7	NATS	5 December	Prefer Option 13 (GA reasons)	No further action required

Table 2 - Summary of Stage 3 Responses

A response from DAATM was received on the 5 December and was logged as an objection because there was no option to select 'not supported'. The full response is included at Annex A12.6. DAATM raise several points in support of their objection, many of which are statements which the CS recognises as legitimate concerns. However, many of these do not materially affect the option of introducing a TMZ which is the current stated CAA policy for dealing with nationally significant infrastructure developments such as major windfarms; hence the focus on an ACP solution to develop a TMZ for the EA Hub developments.

DAATM concerns were identified as Hazards for further consideration as part of the safety case involve:

- Loss of primary radar coverage over sectors of Air-to-Air refuelling Area (AARA) 09; amounting to approximately 15% of the AARA 09 area.
- Loss of primary radar coverage over sectors of the Lakenheath ATA (North/South); amounting to approximately 10% of the ATA area.
- Requirement to split formations inside a TMZ area prior to crossing the FIR boundary.

The safety case work will address the specifics of the DAATM response and develop safety requirements to address the hazards identified and to further mitigate any residual risk. It should be noted that a traffic survey¹⁷ was conducted at Stage 2 of the process and the detail has been available on the CAA Portal since 28 June 2024. The aviation study concludes there would be minimal impact on non-transponding GA aircraft who rarely operate in the areas. Furthermore, no concerns were received by aircraft operators who use the military assigned areas in question; this is possibly because the proposed EA1N TMZ only encroaches on 10% of the AARA 09 area in the south and proposed EA3 TMZ only encroaches on 6% of the AARA area in the extreme north-east. Considering the Lakenheath ATA North (FL60-FL245), the proposed EA3 TMZ encroaches on <5% of the area and only that 4,000 ft volume below FL100. With respect to Lakenheath ATA South (FL60-FL195) the proposed EA1N TMZ encroaches only on 11% of the area and only that 4,000 ft volume below FL100; the proposed EA2 TMZ encroaches on <3% of the area and only that 4,000 ft

¹⁷ 71951 012 East Anglia Hub Aviation Study Data 2024 v1.0, published on CAA Portal and dated 18 June 2024.

volume below FL100. In total, and only in the 4,000ft volume below FL100 the proposed TMZs only encroach on <10% of the total Lakenheath ATA volume.

The CS remains committed to working closely with DAATM to gain a common understanding and perspective of the real risk given DAATM's statement that the planned NATS replacement radar will reduce the risks when operational in 2027/2028; this date is before or just coincident with the planned operational dates for EA2 and EA1N.

5 Conclusions

5.1 Modification of Final Design

During the earlier Stages of this ACP and in accordance with CAP 1616h engagement activity was conducted to seek feedback on the design principles stipulated and further developed by the CS for this specific ACP. The feedback received was described earlier in para 3.4 and provided evidence to show that no modifications to design principles were necessary.

The design principles served as the basis for development of design options detailed in the design options document¹⁸ that formed part of the formal Stage 3 engagement materials alongside the Engagement Document¹⁹. These documents fully described the options developed and detailed how the associated assessments had concluded that Option 13 and Option 15 would be taken forward to the formal engagement exercise held at the end of 2024.

After full consideration of all responses received during both periods of engagement the CS has received no feedback to suggest that the options chosen require further design modification. However, the response received by DAATM does comment on the wider suitability of TMZs as partial mitigation for the effects of windfarms on air traffic and air defence radar systems. The specific hazards implicit in DAATM's response and the associated issues raised will be taken forward for assessment as part of the formal safety case that supports this ACP. At this stage, no further modification of the final designs is necessary.

5.2 Next Steps

This Engagement Summary Report forms part of the output from Stage 4 of the CAP1616h process and will form part of the formal ACP Submission to the CAA for Stage 5. The CAA will review and assess the Proposal at Stage 5, including all supporting materials. The conclusions of the CAA assessment and its decision will be published on the Airspace Change Portal website.

¹⁸ 71951 006 East Anglia Hub Wind Farms ACP-2022-079 Design Options Issue 2 dated 8 July 2024.

¹⁹ 72039 002 East Anglia Hub Wind Farms ACP-2022-079 Engagement Document 2024 Issue 1, dated 22nd October 2024.

A1 List of Stakeholders

Stakeholder Organisation	Representative(s)
National Air Traffic Management Advisory Committees (NATMAC)	
Airlines UK	██████████ (██████████@airlinesuk.org) ██████████ (██████████@airlinesuk.org)
Airport Operators Association (AOA)	██████████ (██████████@aoa.org.uk) ██████████ (██████████@aoa.org.uk)
Airfield Operators Group (AOG)	██████████ (██████████@goodwood.com) CC only: ██████████ (██████████@bartaby.org)
Aircraft Owners and Pilots Association (AOPA)	██████████ (██████████@aopa.co.uk)
Airspace Change Organising Group (ACOG)	██████████ (██████████@acog.aero)
Association of Remotely Piloted Aircraft Systems UK (ARPAS-UK)	██████████ (██████████@arpas.uk)
Aviation Environment Federation (AEF)	██████████ (██████████@aef.org.uk) ██████████@aef.org.uk (Alternative email)
British Airways (BA)	Capt ██████████ (██████████@ba.com)
BAe Systems	██████████ (██████████@baesystems.com)
British Airline Pilots Association (BALPA)	██████████ (██████████@balpa.org) ██████████ (██████████@balpa.org)
British Balloon and Airship Club	██████████ (██████████@btinternet.com)
British Business and General Aviation Association (BBGA)	██████████ (██████████@bbga.aero)
British Gliding Association (BGA)	██████████ (██████████@gliding.co.uk)
British Helicopter Association (BHA)	██████████ (██████████@britishhelicopterassociation.org)
British Microlight Aircraft Association (BMAA)	██████████ (██████████@bmaa.org) ██████████ (██████████@gmail.com)
British Skydiving	██████████ (██████████@britishskydiving.org)
Drone Major	██████████ (██████████@dronemajorgroup.com) CC Only: ██████████ (██████████@dronemajorgroup.com) Alternative: ██████████@thecommunicationgroup.co.uk
General Aviation Alliance (GAA)	██████████ (██████████@gaalliance.org.uk) CC Only: ██████████ (██████████@yahoo.co.uk)
Guild of Air Traffic Control Officers (GATCO)	██████████ (██████████@gatco.org) ██████████@gatco.org (Alternative email)

Stakeholder Organisation	Representative(s)
Honourable Company of Air Pilots (HCAP)	██████████ (██████████@airpilots.org)
Helicopter Club of Great Britain (HCGB)	██████████ (██████████@ryelands.net) (Alt Email: ██████████@ryelands.net)
Isle of Man CAA	██████████ (██████████@gov.im)
Light Aircraft Association (LAA)	██████████ (██████████@laa.uk.com)
Low Fare Airlines	██████████ (██████████@easyjet.com)
Military Aviation Authority (MAA)	Cdr ██████████ (██████████@mod.gov.uk)
Ministry of Defence - Defence Airspace and Air Traffic Management (MoD DAATM)	Gp Capt ██████████ (██████████@mod.gov.uk) (Alt Email: ██████████@mod.gov.uk)
NATS	██████████ (██████████@nats.co.uk) ██████████ (██████████@nats.co.uk)
Navy Command HQ	Lt Cdr ██████████ (██████████@mod.gov.uk) Lt Cdr ██████████ (██████████@mod.gov.uk)
PPL/IR (Europe)	██████████ (██████████@pplir.org) (Alternative Email: ██████████@tdn.email)
UK Airprox Board (UKAB)	██████████ (██████████@airproxboard.org.uk) CC Only: ██████████@airproxboard.org.uk
UK Flight Safety Committee (UKFSC)	██████████ (██████████@ukfsc.co.uk)
United States Visiting Forces (USVF), HQ United States Country Rep-UK (HQ USCR-UK).	██████████ (██████████@us.af.mil)

Table 3 - NATMAC Stakeholder List

Stakeholder Organisation	Representative(s)
Other Identified Stakeholders	
Luchtverkeersleiding Nederland (LVNL)	General Enquiries ██████████@lvnl.nl
Bristow Helicopters	██████████ (██████████@bristowgroup.com)
CHC Helicopter	██████████ (██████████@chcheli.com)
NHV	██████████ (██████████@nhv.be)

Stakeholder Organisation	Representative(s)
Offshore Helicopters	[REDACTED] ([REDACTED]@offshoreheli-uk.com)
Search and Rescue (Bristow Helicopters)	[REDACTED] ([REDACTED]@bristowgroup.com)
Police Scotland and Air Ambulance (Babcock Mission Critical Services)	[REDACTED] ([REDACTED]@babcockinternational.com)
Northern Lighthouse (PDG Helicopters)	[REDACTED] ([REDACTED]@pdgaviation.com)
Air Ambulance (Gama Aviation)	[REDACTED] ([REDACTED]@gamaaviation.com)
Norwich Airport	[REDACTED] ([REDACTED]@norwichairport.co.uk)
Southend Airport	Southend Airport ATC ([REDACTED]@southendairport.com, Alternative email: [REDACTED]@london-southend-airport.com (Administration))

Table 4 - Other Identified Stakeholders

A2 Stage 2 Engagement – Notification

A2.1 Initial Engagement Email

Request for Stakeholder Initial Design Principles Engagement for the EA Hub OSWF ACP (ACP-2023-079)



Unclassified

You forwarded this message on 28/03/2024 14:04.

20240321-ACP-2023-079_EAHub_Initial DP Engagement Letter_Issue1.pdf 442 KB

Dear Stakeholder,

On behalf of our Client and ACP Change Sponsor (CS), ScottishPower Renewables (UK) Ltd, I invite you as an identified stakeholder to engage with us on the development of the East Anglia Hub airspace change proposal (ACP-2023-079). At this stage of the ACP process the CS is required to develop a set of Design Principles (DP) in which to qualify against any future airspace design options. Accompanying this email is the CS's initial DP letter and engagement material for your review in which your engagement on this matter is greatly appreciated.

The CS requires all correspondence regarding this engagement activity to go through the email address provided in the attached letter.

Additional information on this ACP can be found on the CAA Airspace Portal under the reference [ACP-2023-079-ScottishPower Renewables \(UK\) Ltd East Anglia Hub Windfarms Mitigation](#). The CS would specifically draw your attention to the recently published ACP [Current-day Scenario \(CDS\)](#), which will provide additional context and situational awareness on this project.

The engagement period will be from 28th March to 25th April 2024 inclusive.

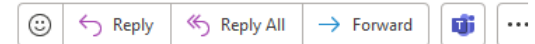
Thank you in advance.

Kindest of regards,



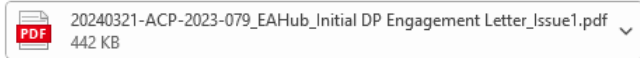
A2.2 Mid-Engagement Reminder Email

(ACP-2023-079) Mid-Engagement period Remainder - Request for Stakeholder Initial DPs Engagement for the EA Hub OSWF ACP



Thu 11/04/2024 15:00

Unclassified



UNCLASSIFIED


Dear Stakeholder,

ACP-2023-079: Design Principle - Mid-Engagement Reminder Notice

Please see the email below relating to an engagement being undertaken by Osprey CSL on behalf of our client, ScottishPower Renewables Ltd, which commenced on the 28th March 2024. The engagement's intent is to illicit transparent stakeholder comment and development concerning the Airspace Change Proposals (ACPs) Stage 2 - Design Principles (DPs). These DPs will be vital to the airspace change as they will be utilised to evaluate future airspace design options later in the ACP process.

Accompanying this email is our client's initial DP letter and engagement material for your review in which your engagement on this matter is greatly appreciated.

If you have already responded thank you for your time. If not, this engagement will close on the cease of business on the **25th April 2024**. If you would like to provide feedback, then please do so before this date.

The preferred method of stakeholder communication is via the following email: @scottishpower.com

We would greatly appreciate your viewpoint on this ACP DPs development.

Thank you in advance.

Kind regards,



A3 Stage 2 Engagement - Letter



Date: 28/03/2024
CAA Ref: ACP-2023-079
Osprey Ref: 71951

Dear Stakeholder,

CAP 1616 ACP-2023-079: East Anglia Hub

Stage 1 - Design Principles Initial Stakeholder Engagement

1.1 Invitation for Stakeholders to Comment on Initial Design Principles

The primary purpose of this document is to communicate and engage with all pertinent aviation and non-aviation stakeholders to afford them an opportunity to influence the development of key elements and outputs of this Airspace Change Proposal (ACP).

This document's key focus is to gain feedback on the Change Sponsor's (CS) initial Design Principles (DPs) for the proposed Airspace Change. The stakeholders feedback could influence and re-define the final set of DP's taken forward to the next stage of the ACP. The DPs are a vital tool to assist with the development and evaluation of future airspace Design Options (DO) at Stage 2.

A further requirement set out in CAP1616 is for ScottishPower Renewables (UK) Ltd (SPR), the CS, to demonstrate it has followed the CAA CAP1616 Stage 1 requirements during the development of the East Anglia Hub (EA Hub) Offshore Wind Farm (OSWF) Airspace Change Proposal¹. Figure 1 below shows the current progress of this ACP and where the DP development resides in the process.

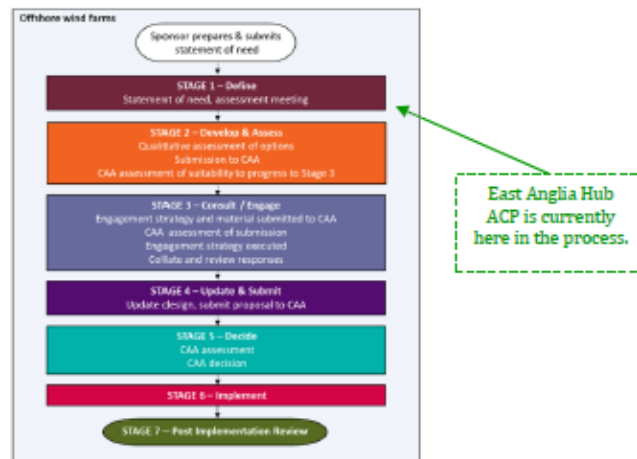


Figure 1 - CAP 1616 H-Annex B: OSWF mitigation airspace change process overview.

¹ [CAA Airspace Change Portal: ACP-2023-079 – ScottishPower Renewables \(UK\) Ltd East Anglia Hub Windfarms Mitigation.](#)

CAP 1616 ACP-2023-079: East Anglia Hub

The EA Hub ACP consists of three distinct wind farms (Figure 2), East Anglia 1 North² (EA1N), East Anglia 2 (EA2), and East Anglia 3 (EA3). At this stage, this ACP adheres to the requirements of CAP 1616³ Stages 1 (DEFINE) to create a short-list of Design Principles (DP)⁴.

At this initiating stage of stakeholder engagement, the CS has elected to include all members of the National Air Traffic Management Advisory Committee (NATMAC)⁵ (effective 8th January 2024), and several key regional stakeholders located in the vicinity of the Norfolk and Suffolk coastal areas.

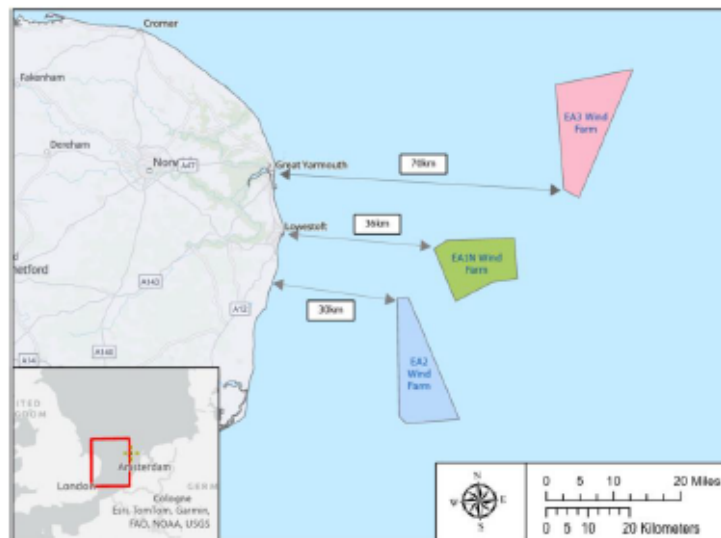


Figure 2 - EA Hub Wind Farm North Sea Locations and distance (approx.) from the UK coastline

1.2 Statement of Need

The following [Statement of Need \(SoN\)](#) was submitted by the CS to the CAA in November 2023, and an ACP Assessment Meeting was held with the CAA on 16th January 2024 to discuss the project. As part of the CAA ACP process the CS was required by CAP1616 to submit a DAP1916 SoN form. The SoN included the proposed ACP's main objectives, along with any supporting situational context. The CAA's review of the SoN, during the assessment meeting, and an accompanying [SPR ACP presentation](#), supported their evaluation of both the necessity for an ACP and the determination of a provisional ACP Level.

The SoN below is a direct copy of the initial SoN submission which details the following:

Objective: The objective of the proposed airspace change is to mitigate safety concerns and ensure that aviation operations remain unhindered in the planned development area of the EA Hub Offshore Windfarm's wind turbine generators comprising of EA1N, EA2 & EA3 in the North Sea.

² Not to be mistaken with East Anglia 1, which is already operational.

³ ACP-2023-079 was allocated a CAA pre-scaled Level 3 ACP (16/01/24).

⁴ CAP1616H-Guidance on Airspace Change Process for Level 3 and Pre-Scaled Airspace Change Proposals (Nov 2023 - Edition 1)

⁵ National Air Traffic Management Advisory Committee (NATMAC) website

Summary of Issues / Opportunities: The purpose of this ACP is to address safety concerns regarding any potential false radar contacts that may be caused by the EA Hub Windfarm development. The proposal also seeks to mitigate issues raised by NATS regarding 'Primary Surveillance Radar at Cromer, and its associated air traffic services'. Although the MOD have commented on the potential for similar concerns to their air surveillance and control operations, a separate technical solution workstream is being conducted in parallel to this proposed ACP, under the Joint Aviation Task Force Working Group.

Description of current Airspace Design: The East Anglia (EA) Hub is planning to locate wind turbine generators in the North Sea, east of Norwich, and comprises of three windfarms (EA1N, EA2, & EA3). All three sites are located within 16km of each other and are proposed to be situated in current Class G, uncontrolled airspace. Part of each proposed site is situated beneath or in close proximity to a combination of established CTA Control Areas, Temporary Restricted Areas, Aerial Tactics Areas, Transponder Mandatory Zones airspace and Air Traffic Service Routing and Helicopter Main Routing Indicators. At this current stage, the effects and design of the future airspace structure are not known.

Current Prevailing Air Traffic Situation: The planned area for the Windfarms in the North Sea is primarily Class G uncontrolled airspace that is available for all users. The Change Sponsor is aware that various general and operational activities, including those of the Ministry of Defence (MoD), general aviation, and Search and Rescue operations conducted by the Maritime and Coastguard Agency (MCA), occur within the proposed area. These entities are some of the stakeholders with whom the Change Sponsor intends to engage with during the CAP 1616 process.

Additional Information: The Change Sponsor is aware that the planned EA3 Wind Farm is situated in close proximity to the recently approved Norfolk Vanguard & Norfolk Boreas Wind Farms (ACP-2018-03) and will ensure that close liaison with the Change Sponsor of ACP-2018-03 is maintained during the design options process.

1.3 Initial Stakeholder Engagement

As CS for the EA Hub Wind Farms ACP, SPR are now contacting you directly as you have been identified as a stakeholder who's views we would welcome. Specifically, we are eager to seek your opinions on our proposed DPs in support of this airspace change. Further information on this ACP can be found on the CAA Airspace Change Portal submission under the title '[ScottishPower Renewables \(UK\) Ltd East Anglia Hub Windfarms Mitigation \(ACP-2023-079\)](#)', specifically the [Current-day Scenario \(CDS\)](#) document. The CDS provides an informative baseline scenario of the airspace change area today, and any associated considerations which may concern the progression of this ACP.

1.4 Design Principles

SPR have developed a series DPs in-line with the guidance provided in the CAP 1616H⁶ pre-scaled Level 3 process, which directly addresses ACPs with associated OSWF (CAP 1616H-Appendix B).

A level 3 ACP, the lowest of three tiers, is defined as changes to notified airspace design that have a potentially **low impact** on both aviation and non-aviation stakeholders. Compared against Levels 1 & 2, level 3 ACPs also have a reduced CAP

⁶ CAP1616H-Guidance on Airspace Change Process for Level 3 and Pre-Scaled Airspace Change Proposals (Nov 2023 - Edition 1)

1616H output requirement and a more condensed time scale, depending on intended ACP complexity.

As stated in the SoN (above), the CS is seeking a TMZ ACP solution to the EA Hub OSWF complex, which is also acknowledged by CAP1616H to have limited set of available design options. However, the DPs (below) are specifically designed to elect this type of future airspace option, in accordance with CAP1616H-Annex B⁷.

Although this pre-scaled Level 3 ACP is only required to adopt the CAP1616 Mandatory Design Principles (MDP), the CS has also adopted several Discretionary and Bespoke DPs for your consideration.

- **Mandatory Design Principles (MDP)**

- **MDP Safety:**

The airspace change proposal must maintain a high standard of safety and should seek to enhance current levels of safety.

- **MDP Policy:**

The airspace change proposal should not be inconsistent with relevant legislation, the CAA's airspace modernization strategy or Secretary of State and CAA's policy and guidance.

- **MDP Environment:**

The airspace change proposal should deliver the Government's key environmental objectives with respect to air navigation as set out in the Government's Air Navigation Guidance 2017.

- **Discretionary Design Principles (DDP)**

- **DDP Technical 1 (Other aviation stakeholders):**

The airspace change proposal should consider the impacts on air navigation service providers and other aviation stakeholders such as nearby airport operators.

- **DDP Technical 2 (Ministry of Defence requirements):**

The airspace change proposal should be compatible with the requirements of the Ministry of Defence.

- **DDP Technical 3 (Accessibility for all airspace users):**

The airspace change proposal should satisfy the requirements of operators and owners of all classes of aircraft, including general aviation and other civilian airspace users.

- **Bespoke Design Principles (BDP)**

- **BDP Policy:**

The airspace change proposal should ensure that the design of the proposed TMZ complies with the CAA TMZ Policy⁸.

- **BDP Technical 3 (Airspace):**

The airspace change should be designed to fit with existing background airspace classification and any known planned changes.

⁷ CAP1616H-Guidance on Airspace Change Process for Level 3 and Pre-Scaled Airspace Change Proposals (Nov 2023 - Edition 1)

⁸ SARG Policy Statement: Policy for Radio Mandatory Zones and Transponder Mandatory Zones (13 Jan 2022).

- **BDP Technical 4 (Airspace):**

The volume of airspace affected should be the minimum necessary to deliver a safe solution to counter the effects of wind turbine generators on ATC surveillance infrastructure.

CAP 1616H guidance explains that it is important for the DPs to be drawn up through engagement between the CS and affected stakeholders at this early stage in the process. Therefore, we are seeking your views on whether the proposed DPs are appropriate and would welcome any further comment you wish to provide.

Nominated stakeholders will have a four-week period to respond and contribute to this ACPs DP development. The DP engagement period will run from 28th March 2024 through to 25th April 2024. A follow-up email to the initial engagement email will be distributed at the mid-point of the engagement period.

In order to meet the documented engagement and transparency requirements for the ACP process it is requested that written feedback is provided to the undersigned no later than the 25th April 2024.

Should you wish to discuss this proposal and their associated DPs in greater depth please contact the undersigned on the email provided below.

Regards,

[Redacted signature]

[Redacted name]

Senior Planning & Environmental Policy Analyst

ScottishPower Renewables

Email: [Redacted]@scottishpower.com

A4 Stage 2 Engagement - Record

Stakeholder Organisation	Representative(s)	Engagement Type	Date	Remarks
National Air Traffic Management Advisory Committees (NATMAC)				
Airlines UK	██████████ (██████████@airlinesuk.org) ██████████ (██████████@airlinesuk.org)	Initial Engagement Email - Initial DPs	28 March 2024	No Response
		Reminder Email	12 April 2024	No Response
Airport Operators Association (AOA)	██████████ (██████████@aoa.org.uk) ██████████ (██████████@aoa.org.uk)	Initial Engagement Email - Initial DPs	28 March 2024	No Response
		Reminder Email	12 April 2024	No Response
Airfield Operators Group (AOG)	██████████ (██████████@goodwood.com) CC only: ██████████ (██████████@bartaby.org)	Initial Engagement Email - Initial DPs	28 March 2024	No Response
		Reminder Email	12 April 2024	No Response
Aircraft Owners and Pilots Association (AOPA)	██████████ (██████████@aopa.co.uk)	Initial Engagement Email - Initial DPs	28 March 2024	No Response
		Reminder Email	12 April 2024	No Response
Airspace Change Organising Group (ACOG)	██████████ (██████████@acog.aero)	Initial Engagement Email - Initial DPs	28 March 2024	No Response
		Reminder Email	12 April 2024	No Response
Association of Remotely Piloted Aircraft Systems UK (ARPAS-UK)	██████████ (██████████@arpas.uk)	Initial Engagement Email - Initial DPs	28 March 2024	No Response
		Reminder Email	12 April 2024	No Response
Aviation Environment Federation (AEF)	██████████ (██████████@aef.org.uk) ██████████@aef.org.uk (Alternative email)	Initial Engagement Email - Initial DPs	28 March 2024	No Response Postmaster failed delivery

Stakeholder Organisation	Representative(s)	Engagement Type	Date	Remarks
		Reminder Email	12 April 2024	No Response
British Airways (BA)	Capt [REDACTED] ([REDACTED]@ba.com)	Initial Engagement Email - Initial DPs	28 March 2024	No Response
		Reminder Email	12 April 2024	No Response
BAe Systems	[REDACTED] ([REDACTED]@baesystems.com)	Initial Engagement Email - Initial DPs	28 March 2024	No Response
		Reminder Email	12 April 2024	No Response
British Airline Pilots Association (BALPA)	[REDACTED] ([REDACTED]@balpa.org) [REDACTED] ([REDACTED]@balpa.org)	Initial Engagement Email - Initial DPs	28 March 2024	No Response
		Reminder Email	12 April 2024	No Response
British Balloon and Airship Club	[REDACTED] ([REDACTED]@btinternet.com)	Initial Engagement Email - Initial DPs	28 March 2024	No Response
		Reminder Email	12 April 2024	No Response
British Business and General Aviation Association (BBGA)	[REDACTED] ([REDACTED]@bbga.aero)	Initial Engagement Email - Initial DPs	28 March 2024	No Response
		Reminder Email	12 April 2024	No Response
British Gliding Association (BGA)	[REDACTED] ([REDACTED]@gliding.co.uk)	Initial Engagement Email - Initial DPs	28 March 2024	Info Only. See Annex A5
British Helicopter Association (BHA)	[REDACTED] ([REDACTED]@britishhelicopterassociation.org)	Initial Engagement Email - Initial DPs	28 March 2024	Info Only. See Annex A5
British Microlight Aircraft Association (BMAA)	[REDACTED] ([REDACTED]@bmaa.org) [REDACTED] ([REDACTED]@gmail.com)	Initial Engagement Email - Initial DPs	28 March 2024	No Response Postmaster failed delivery
		Reminder Email	12 April 2024	No Response
British Skydiving	[REDACTED] ([REDACTED]@britishskydiving.org)	Initial Engagement Email - Initial DPs	28 March 2024	No Response
		Reminder Email	12 April 2024	No Response

Stakeholder Organisation	Representative(s)	Engagement Type	Date	Remarks
Drone Major	██████████ (██████████@dronemajorgroup.com) CC Only: ██████████ (██████████@dronemajorgroup.com) Alternative: ██████████@thecommunicationgroup.co.uk	Initial Engagement Email - Initial DPs	28 March 2024	No Response Postmaster failed delivery
		Reminder Email	12 April 2024	No Response
General Aviation Alliance (GAA)	██████████ (██████████@gaalliance.org.uk) CC Only: ██████████ (██████████@yahoo.co.uk)	Initial Engagement Email - Initial DPs	28 March 2024	No Response
		Reminder Email	12 April 2024	No Response
Guild of Air Traffic Control Officers (GATCO)	██████████ (██████████@gatco.org) ██████████@gatco.org (Alternative email)	Initial Engagement Email - Initial DPs	28 March 2024	No Response Postmaster failed delivery
		Reminder Email	12 April 2024	No Response
Honourable Company of Air Pilots (HCAP)	██████████ (██████████@airpilots.org)	Initial Engagement Email - Initial DPs	28 March 2024	No Response
		Reminder Email	12 April 2024	No Response
Helicopter Club of Great Britain (HCGB)	██████████ (██████████@ryelands.net) (Alt Email: ██████████@ryelands.net)	Initial Engagement Email - Initial DPs	28 March 2024	No Response
		Reminder Email	12 April 2024	No Response
Isle of Man CAA	██████████ (██████████@gov.im)	Initial Engagement Email - Initial DPs	28 March 2024	No Response
		Reminder Email	12 April 2024	No Response
Light Aircraft Association (LAA)	██████████ (██████████@laa.uk.com)	Initial Engagement Email - Initial DPs	28 March 2024	No Response
		Reminder Email	12 April 2024	No Response
Low Fare Airlines	██████████ (██████████@easyjet.com)	Initial Engagement Email - Initial DPs	28 March 2024	No Response

Stakeholder Organisation	Representative(s)	Engagement Type	Date	Remarks
		Reminder Email	12 April 2024	No Response
Military Aviation Authority (MAA)	Cdr ██████████ ██████████@mod.gov.uk	Initial Engagement Email - Initial DPs	28 March 2024	No Response
		Reminder Email	12 April 2024	No Response
Ministry of Defence - Defence Airspace and Air Traffic Management (MoD DAATM)	Gp Capt ██████████ ██████████@mod.gov.uk (Alt Email: ██████████@mod.gov.uk)	Initial Engagement Email - Initial DPs	28 March 2024	No Response
		Reminder Email	12 April 2024	No Response
NATS	██████████ (██████████@nats.co.uk) ██████████ (██████████@nats.co.uk)	Initial Engagement Email - Initial DPs	28 March 2024	No Response
		Reminder Email	12 April 2024	Info Only. See Annex A5
Navy Command HQ	Lt Cdr ██████████ ██████████@mod.gov.uk Lt Cdr ██████████ ██████████@mod.gov.uk	Initial Engagement Email - Initial DPs	28 March 2024	No Response
		Reminder Email	12 April 2024	No Response
PPL/IR (Europe)	██████████ (██████████@pplir.org) (Alternative Email: ██████████@tdn.email)	Initial Engagement Email - Initial DPs	28 March 2024	No Response
		Reminder Email	12 April 2024	No Response
UK Airprox Board (UKAB)	██████████ (██████████@airproxboard.org.uk) CC Only: ██████████@airproxboard.org.uk	Initial Engagement Email - Initial DPs	28 March 2024	No Response
		Reminder Email	12 April 2024	No Response
UK Flight Safety Committee (UKFSC)	██████████ (██████████@ukfsc.co.uk)	Initial Engagement Email - Initial DPs	28 March 2024	No Response
		Reminder Email	12 April 2024	No Response
United States Visiting Forces (USVF), HQ United States Country Rep-UK (HQ USCR-UK).	██████████ (██████████@us.af.mil)	Initial Engagement Email - Initial DPs	28 March 2024	No Response
		Reminder Email	12 April 2024	No Response

Stakeholder Organisation	Representative(s)	Engagement Type	Date	Remarks
Other Identified Stakeholders				
Luchtverkeersleiding Nederland (LVNL)	General Enquiries [REDACTED]@lvnl.nl	Initial Engagement Email - Initial DPs	28 March 2024	No Response
		Reminder Email	12 April 2024	No Response
		Late Response	29 April 2024	See Annex A5
Bristow Helicopters	[REDACTED] [REDACTED]@bristowgroup.com)	Initial Engagement Email - Initial DPs	28 March 2024	No Response
		Reminder Email	12 April 2024	No Response
CHC Helicopter	[REDACTED] ([REDACTED]@chcheli.com)	Initial Engagement Email - Initial DPs	28 March 2024	Info Only. See Annex A5
		Reminder Email	12 April 2024	No Response
NHV	[REDACTED] ([REDACTED]@nhv.be)	Initial Engagement Email - Initial DPs	28 March 2024	No Response
		Reminder Email	12 April 2024	No Response
Offshore Helicopters	[REDACTED] ([REDACTED]@offshoreheli-uk.com)	Initial Engagement Email - Initial DPs	28 March 2024	No Response
		Reminder Email	12 April 2024	No Response
Search and Rescue (Bristow Helicopters)	[REDACTED] ([REDACTED]@bristowgroup.com)	Initial Engagement Email - Initial DPs	28 March 2024	No Response
		Reminder Email	12 April 2024	No Response
Police Scotland and Air Ambulance (Babcock Mission Critical Services)	[REDACTED] [REDACTED]@babcockinternational.com)	Initial Engagement Email - Initial DPs	28 March 2024	No Response
		Reminder Email	12 April 2024	Info Only. See Annex A5
Northern Lighthouse (PDG Helicopters)	[REDACTED] ([REDACTED]@pdgaviation.com)	Initial Engagement Email - Initial DPs	28 March 2024	No Response
		Reminder Email	12 April 2024	No Response

Stakeholder Organisation	Representative(s)	Engagement Type	Date	Remarks
Air Ambulance (Gama Aviation)	[REDACTED] ([REDACTED]@gamaaviation.com)	Initial Engagement Email - Initial DPs	28 March 2024	No Response
		Reminder Email	12 April 2024	No Response
Norwich Airport	Norwich Airport Operations [REDACTED]@norwichairport.co.uk)	Initial Engagement Email - Initial DPs	28 March 2024	No Response
		Reminder Email	12 April 2024	No Response
Southend Airport	Southend Airport ATC [REDACTED]@southendairport.com, Alternative email: [REDACTED]@londonouthendairport.com (Administration))	Initial Engagement Email - Initial DPs	28 March 2024	No Response

Table 5 - Stage 2 Engagement Record

A4.1 Engagement Email Delivery Issues

Table 6 below shows which of the 44 stakeholder we reached out to but received a failed delivery notification. Annotated in blue is the alternative email address which was then used.

Stakeholder Organisation	Representative(s)	Engagement Type	Date	Remarks
Aviation Environment Federation (AEF)	[REDACTED] ([REDACTED]@aef.org.uk) [REDACTED]@aef.org.uk	Initial Engagement Email - Initial DPs	28 March 2024	No Response
		Reminder Email	12 April 2024	No Response
British Microlight Aircraft Association (BMAA)	[REDACTED] ([REDACTED]@bmaa.org) [REDACTED] ([REDACTED]@gmail.com)	Initial Engagement Email - Initial DPs	28 March 2024	No Response
		Reminder Email	12 April 2024	No Response
Drone Major	[REDACTED] [REDACTED]@dronemajorgroup.com) CC Only: [REDACTED] [REDACTED]@dronemajorgroup.com)	Initial Engagement Email - Initial DPs	28 March 2024	No Response
		Reminder Email	12 April 2024	No Response

Stakeholder Organisation	Representative(s)	Engagement Type	Date	Remarks
	██████████@thecomcommunicationgroup.co.uk			
Guild of Air Traffic Control Officers (GATCO)	██████████ (██████████@gatco.org)	Initial Engagement Email - Initial DPs	28 March 2024	No Response
	██████████@gatco.org	Reminder Email	12 April 2024	No Response

Table 6 - Stage 2 Engagement Email Delivery Issues

A5 Stage 2 Engagement - Responses

A5.1 British Gliding Association Response

From: [REDACTED]@gliding.co.uk>
Sent: Thursday, March 28, 2024 2:27 PM
To: [REDACTED]@ospreycsl.co.uk>
Subject: [EXTERNAL] RE: Request for Stakeholder Initial Design Principles Engagement for the EA Hub OSWF ACP (ACP-2023-079)

UNCLASSIFIED

CAUTION: This email originated from outside of the organisation. Do not follow guidance, click links, or open attachments unless you recognise the sender and know the content is safe. [Learn why this is im](#)

Thanks for the engagement.

As these proposed areas are many kms offshore, they will not impact gliding.

We have no comments to make regarding the DPs.

Kind regards

[REDACTED]
BGA



A5.2 CHC Helicopter Response

From: [REDACTED]@chcheli.com>
Sent: Thursday, March 28, 2024 4:21 PM
To: [REDACTED]@ospreycl.co.uk>
Subject: [EXTERNAL] RE: [External]:Request for Stakeholder Initial Design Principles Engagement for the EA Hub OSWF ACP (ACP-2023-079)

CAUTION: This email originated from outside of the organisation. Do not follow guidance, click links, or open attachments unless you recognise the sender and know the content is safe. [Learn why this is important](#)

Hi [REDACTED]

I have had a look over your material and don't see anything that should affect our operation at this point in time.

Have a nice Easter

Regards

[REDACTED]

[REDACTED]

[REDACTED]@chcheli.com

CHC Helicopter
CHC Integrated Ops Building
Buchan Road
Dyce AB21 7BZ



FOR PUBLIC RELEASE



A5.3 British Helicopter Association Response

From: [REDACTED]@britishhelicopterassociation.org>

Sent: Thursday, April 11, 2024 3:50 PM

To: EAHubACP <[REDACTED]@scottishpower.com>

Subject: FW: (ACP-2023-079) Mid-Engagement period Remainder - Request for Stakeholder Initial DPs Engagement for the EA Hub OSWF ACP

EXTERNAL SENDER: Be cautious, especially with links and attachments. Report phishing if suspicious.

On behalf of the BHA I wish to remain on the list of stakeholders. We have nothing to feedback at present but may do one you have finalised the DPs

[REDACTED]
British Helicopter Association
Unit C2
Fair Oaks Airport
Chobham
Surrey. GU24 8HU

Office: +[REDACTED]
Mobile: +[REDACTED]
www.britishhelicopterassociation.org

FOR PUBLIC RELEASE



FOR PUBLIC RELEASE



A5.4 Babcock Mission Critical Service Response

From: [REDACTED]@babcockinternational.com>
Sent: Friday, April 12, 2024 10:04 AM
To: EAHubACP <[REDACTED]@scottishpower.com>
Subject: ACP-2023-079 (UNCLASSIFIED)

EXTERNAL SENDER: Be cautious, especially with links and attachments. Report phishing if suspicious.

Classification: UNCLASSIFIED

Good morning,

Babcock Mission Critical services Onshore is the incumbent aviation partner for East Anglian Air Ambulance conducting HEMS and Air Ambulance operations from Norwich and Cambridge airports.

Based on the information provided within the initial DP Engagement letter Issue 1 dated 31/03/2024 and our normal operating procedures and locations we have no objection to this proposal at this time.

Regards,

[REDACTED]

[REDACTED]

UK Aviation | Aviation
Babcock International Group
Babcock Onshore | Building Se32-33 | Gloucestershire Airport | Cheltenham | Gloucestershire | GL51 6SP
Mob: +[REDACTED]@babcockinternational.com
www.babcockinternational.com

FOR PUBLIC RELEASE



A5.5 NATS Response

From: [REDACTED]@nats.co.uk>
Sent: Thursday, April 18, 2024 1:47 PM
To: [REDACTED]@ospreycl.co.uk>
Cc: [REDACTED]@nats.co.uk>
Subject: [EXTERNAL] RE: Request for Stakeholder Initial Design Principles Engagement for the EA Hub OSWF ACP (ACP-2023-079)

CAUTION: This email originated from outside of the organisation. Do not follow guidance, click links, or open attachments unless you recognise the sender and know the content is safe. [Learn why this is important](#)

Hi [REDACTED]
Thank you for providing NATS (NERL) the opportunity to respond to your ACP.

I can confirm that at this stage of the process we do not have any comments on your Design Principles. We look forward to seeing the Design Options.

Rgds

[REDACTED]

[REDACTED]
E: [REDACTED]@nats.co.uk



A5.6 LNVL Response

From: [REDACTED]@lvnl.nl>
Sent: Monday, April 29, 2024 8:57 AM
To: EAHubACP <[REDACTED]@scottishpower.com>
Cc: [REDACTED]
Subject: RE: (ACP-2023-079) Mid-Engagement period Remainder - Request for Stakeholder Initial DPs Engagement for the EA Hub OSWF ACP

EXTERNAL SENDER: Be cautious, especially with links and attachments. Report phishing if suspicious.

Good morning,

Thanks for the information about the plans of the new East Anglia Hub.

For the helicopter operation in the Amsterdam FIR the impact is limited. Because of the height of the new windfarm (next to COP LUVOR) we probably have to raise the lower level of our HMR KY650. This HMR is now defined from 1500ft-FL055. To maintain 1000ft from the new obstacle we have to raise the lower limit to 2500ft on the last part of that HMR.

In the UK FIR there are huge plans for windfarms. An observation from our side is that there is almost no free corridor(east/west) for VFR traffic. This could be a problem if VFR traffic encounters an engine failure for example. Is that risk already addressed in the UK?

Best regards,

[REDACTED]



Enabling aviation together

[REDACTED]
Senior Designer | ATM/Procedures



A5.7 Osprey Response to LNVL Query

Van: [Redacted] <[Redacted]@ospreyco.uk>

Verzonden: dinsdag 30 april 2024 09:50

Aan: [Redacted]

CC: [Redacted]

Onderwerp: RE: (ACP-2023-079) Mid-Engagement period Remainder - Request for Stakeholder Initial DPs Engagement for the EA Hub OSWF ACP

UNCLASSIFIED

Mr [Redacted]

Thank you for responding to the EA Hub Design Principles Engagement Phase.

We acknowledge your two points raised in your email concerning the potential interactions between HMR KY650 and the clearance altitude you may require from an obstacle, in this case your concern is of EA3 OSWF WTGs, and the second issue was related to potential impact on VFR Traffic navigating in an East/Westerly direction (assuming you are referring to non-transponding aircraft transiting from mainland Europe to the UK).

At this point in the airspace change proposal (ACP) process the Change Sponsor (CS) has been seeking to engage stakeholders on the development of a set of Design Principles (DPs) in which to evaluate any future potential airspace options. The Current-day Scenario (CDS) document which accompanied the DP engagement document ([Link](#)), depicts only the OSWF boundary perimeters and no design options for this stage of the ACP.

The CS intends to contact all Stakeholders again during the Aug / Sept 2024 period, with CAA's approval, on a full engagement of airspace options for this airspace change proposal, in which we would greatly appreciate your input.

At this stage of the process, I cannot comment on any future Design Options for this ACP. However, I can comment that the HMRI/HMR significant point LUVOR is approximately situated 6.82km away from EA3 OSWF's most North-westerly WTG (Figure 1), and thus may have little impact to HMR KY650 operations. However, more information will be available during later stages of this ACP.

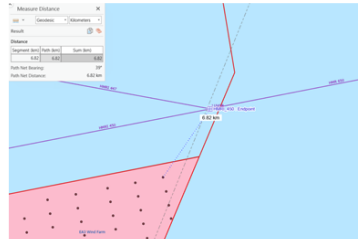


Figure 1 - Proximity of EA3 WTG to LUVOR

I have noted that a similar concern was raised by your organisation for the Norfolk Vanguard and Norfolk Boreas OSWF ([Link](#)) for their ACP Stage 1B Design Principles - Annex E (Pg23 - Item E24), which is located immediately north of the EA3 OSWF.

On your last point, the CS foresees that the General Aviation community (GA) will be a large contributor to the stakeholder engagement throughout this ACP. As you have correctly suggested in your email, the GA (or VFR traffic) transition between mainland Europe and the UK is continually being assessed and considered at all stages of the process, including documenting any associated safety related concerns.

I hope this helps answer your queries and that you are able to continue to comment, as a significant stakeholder, on this ACP's development as the process matures.

Kindest of Regards,

[Redacted]

[Redacted]

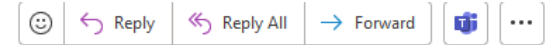
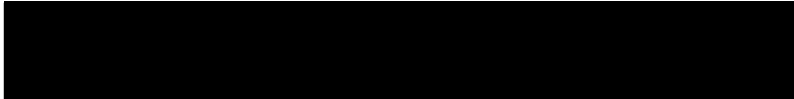
Senior Consultant

 [Redacted] <[Redacted]@ospreyco.uk>
www.ospreyco.uk

Osprey Consulting Services Ltd, Bristol and Bath Science Park, Emersons Green, Bristol, BS16 7FR



A5.8 LVNL's Response to Osprey's Correspondence



Tue 30/04/2024 10:05

Unclassified

UNCLASSIFIED

CAUTION: This email originated from outside of the organisation. Do not follow guidance, click links, or open attachments unless you recognise the sender and know the content is safe. [Learn why this is important](#)

Hello [Redacted]

Thanks for your quick and clear reply.
Good luck with the process for now.

Best regards,



Enabling aviation together




[Redacted] Senior Designer | ATM/Procedures

A6 SPR Website Campaign

ScottishPower Renewables

[About Us](#) | [Careers](#) | [Corporate Governance](#) | [Landowners](#) | [Media Centre](#) | [Offshore](#) | [Onshore](#)



Media Centre


[Home](#) / [Media Centre](#) / [Press Releases](#) / [East Anglia HUB Airspace Change Propo...](#)

Recent

History

East Anglia HUB Airspace Change Proposal - Engagement Phase

29/10/2024



Scottish Power Renewables Ltd have now completed Stage 3 of the Civil Aviation Authorities (CAA) Airspace Change Proposal (ACP) CAP 1616H process and have had approval from the CAA to carry out a six week engagement with interested stakeholders for the East Anglia (EA) HUB complex of offshore windfarms. This is a major milestone in the project's continuing development.

The Engagement Phase will commence on the 28th October through to the 8th December 2024. All views are welcome. This next round of stakeholder engagement aims to ensure that all aviation and non-aviation stakeholders have their views heard regarding the proposed airspace changes. Please see below the ACP's engagement material for stakeholder consideration.

[ACP-079-2023 – EA Hub ACP: Engagement Material](#)

We look forward to hearing the views from this large, diverse group of interested stakeholders, local aerodromes, and other aviation users, as well as anyone in the nearby areas who feels they may engage on this proposal. These views will help shape the project as it progresses to Stage 4.

You can read more in our [Frequently Asked Questions document](#) or via the [CAA Airspace Change Portal](#).

[Return To Press Releases](#)

[Return To The East Anglia Media Page](#)

A7 FAQs – Hosted on Airspace Portal



East Anglia Hub Wind Farms

Airspace Change Proposal

Frequently Asked Questions

Date: October 2024

Documents Version: 1.0

Document Classification: For Public Release

Reference: 72039 005

ACP-2023-079 - FAQs

A8 Engagement Response Questionnaire

Your Name:	
Your Postcode:	
Your Email Address:	
Select one of the following boxes and check as applicable:	
I am responding as an individual:	I am responding on behalf of an organisation: Organisation Name: Position in Organisation:
If you wish your response to be published anonymously your personal details will be redacted and only be seen by the CAA.	
Yes <input type="checkbox"/> I want my response to be published with my details.	No <input type="checkbox"/> I want my response to be published anonymously.
Feedback Section	
Do you agree that the Design Principle Evaluation was conducted appropriately in line with CAP 1616H?	
Yes <input type="checkbox"/>	No <input type="checkbox"/>
<i>Please provide further comment here if you answered 'No' to the above question.</i>	

After reviewing the [available documentation](#), do you agree with the Change Sponsor (Scottish Power Renewables), that Options 13 and 15 were the only options which fulfilled the criterion for this Airspace Change Proposal?

Yes

No

Please provide further comment here if you answered 'No' to the above question.

Do you support **Option 13 (TMZ (2), RAG Blanking, Norfolk TMZ Overlap)** of this Airspace Change Proposal?

Support

Neutral

Object

No Comment

If applicable, please provide comments on Options 13 to allow us to understand your thoughts on the introduction of this mitigation to the East Anglia Hub Wind Farm. Please consider:

- What do you believe will be the impact of the TMZs on your operation?
- How often do you think these impacts will occur to you or others?
- Do you have any suggested mitigations or design changes you think should be considered?
- Do you think there may be any unintended consequences of the TMZs?

Do you support **Option 15 (TMZ (2), RAG Blanking, FIR, Norfolk TMZ Overlap)** of this Airspace Change Proposal?

Support

Neutral

Object

No Comment

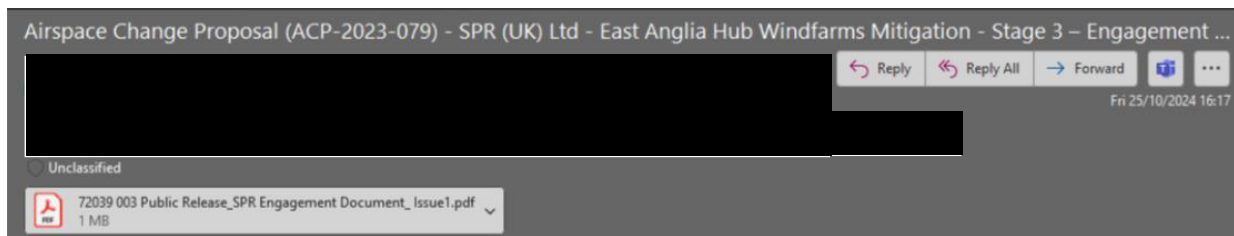
If applicable, please provide comments on Options 15 to allow us to understand your thoughts on the introduction of this mitigation to the East Anglia Hub Wind Farm. Please consider:

- What do you believe will be the impact of the TMZs on your operation?
- How often do you think these impacts will occur to you or others?
- Do you have any suggested mitigations or design changes you think should be considered?
- Do you think there may be any unintended consequences of the TMZs?

Additional Comments (optional)

A9 Stage 3 Engagement – Notification

A9.1 Initial Engagement Email



Dear Stakeholder,

Airspace Change Proposal (ACP-2023-079) - ScottishPower Renewables (UK) Ltd East Anglia Hub Windfarms Mitigation

CAP 1616h Level 3 Pre-scaled ACP: Stage 3 - Engagement Phase

In consultation with the CAA, Osprey Consulting Services Ltd (Osprey) have identified your role and/or organisation as a key stakeholder to the proposed airspace change raised by the ACP Change Sponsor (CS), ScottishPower Renewables Limited (SPR).

The CS wishes to invite you to engage on the proposed ACP options published in the attached engagement material ([or Link](#)). Each option includes the establishment of two Transponder Mandatory Zone (TMZ) designs above SPR's East Anglia Hub's offshore windfarm complex, in the North Sea. The TMZ airspace structures are principally designed to support a RAG blanketing mechanism which will mitigate any clutter effects generated from the wind turbines against NATS's Primary Surveillance Radar at Cromer.

The engagement is open for 6 weeks from **28th October to 08th December 2024**

Please can I request you take the time to consider this proposal and respond via one of the methods described in the attached engagement material (Section 5 – How to participate). Please do not reply directly to this email address. Thank you

For more information please consult our [Frequently Asked Questions](#) document, or for a more in depth review of the ACP proposal, then please visit the CAA's airspace portal page for this ACP ([ACP-2023-079](#)) .

All feedback is valuable, whether you support, object or are indifferent to this airspace proposal.

Thank you in advance.

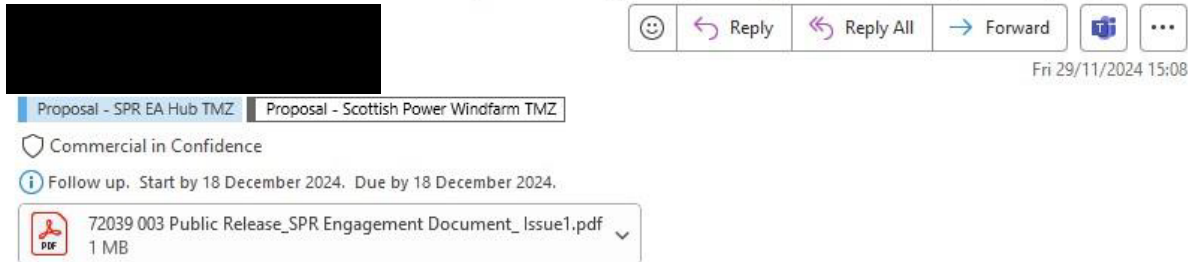
Senior Consultant



osprey@ospreyconsulting.co.uk
www.ospreyconsulting.co.uk

A9.2 Mid Engagement Reminder Email

COMMERCIAL-IN-CONFIDENCE Airspace Change Proposal (ACP-2023-079) - SPR (UK) Ltd -...



Proposal - SPR EA Hub TMZ | Proposal - Scottish Power Windfarm TMZ

Commercial in Confidence

Follow up. Start by 18 December 2024. Due by 18 December 2024.

72039 003 Public Release_SPR Engagement Document_Issue1.pdf
1 MB

COMMERCIAL IN CONFIDENCE

Dear Stakeholder,

Airspace Change Proposal (ACP-2023-079) - ScottishPower Renewables (UK) Ltd East Anglia Hub Windfarms Mitigation

CAP 1616h Level 3 Pre-scaled ACP: Stage 3 - Engagement Phase – Last Reminder

In consultation with the CAA, Osprey Consulting Services Ltd (Osprey) have identified your role and/or organisation as a key stakeholder to the proposed airspace change raised by the ACP Change Sponsor (CS), ScottishPower Renewables Limited (SPR).

We now have just over **one week left** in this engagement and would encourage all stakeholders who have not yet submitted a return to please do so. This engagement will close at cease of business on the **8th December 2024**. If you would like to provide feedback, then please do so before this date. Thank you for your time if you have already responded to this engagement.

The CS again wishes to invite you to engage on the ACP options published in the attached engagement material ([or Link](#)). Each option includes the establishment of two Transponder Mandatory Zone (TMZ) designs above SPR's East Anglia Hub offshore windfarm complex in the North Sea. The TMZ airspace structures are principally designed to support a RAG blanking mechanism which will mitigate any clutter effects generated from the wind turbines against NATS's Primary Surveillance Radar at Cromer.

The engagement is open for 6 weeks from **28th October to 08th December 2024**. As mentioned above, **we are now approaching the last week of this engagement**. No further reminders will be sent.

Please can I request you take the time to consider this proposal and respond via one of the methods described in the attached engagement material (Section 5 – How to participate). **Please do not reply directly to this email address. Thank you.**

For more information please consult our [Frequently Asked Questions](#) document, or for a more in depth review of the ACP proposal, then please visit the CAA's airspace portal page for this ACP ([ACP-2023-079](#)).

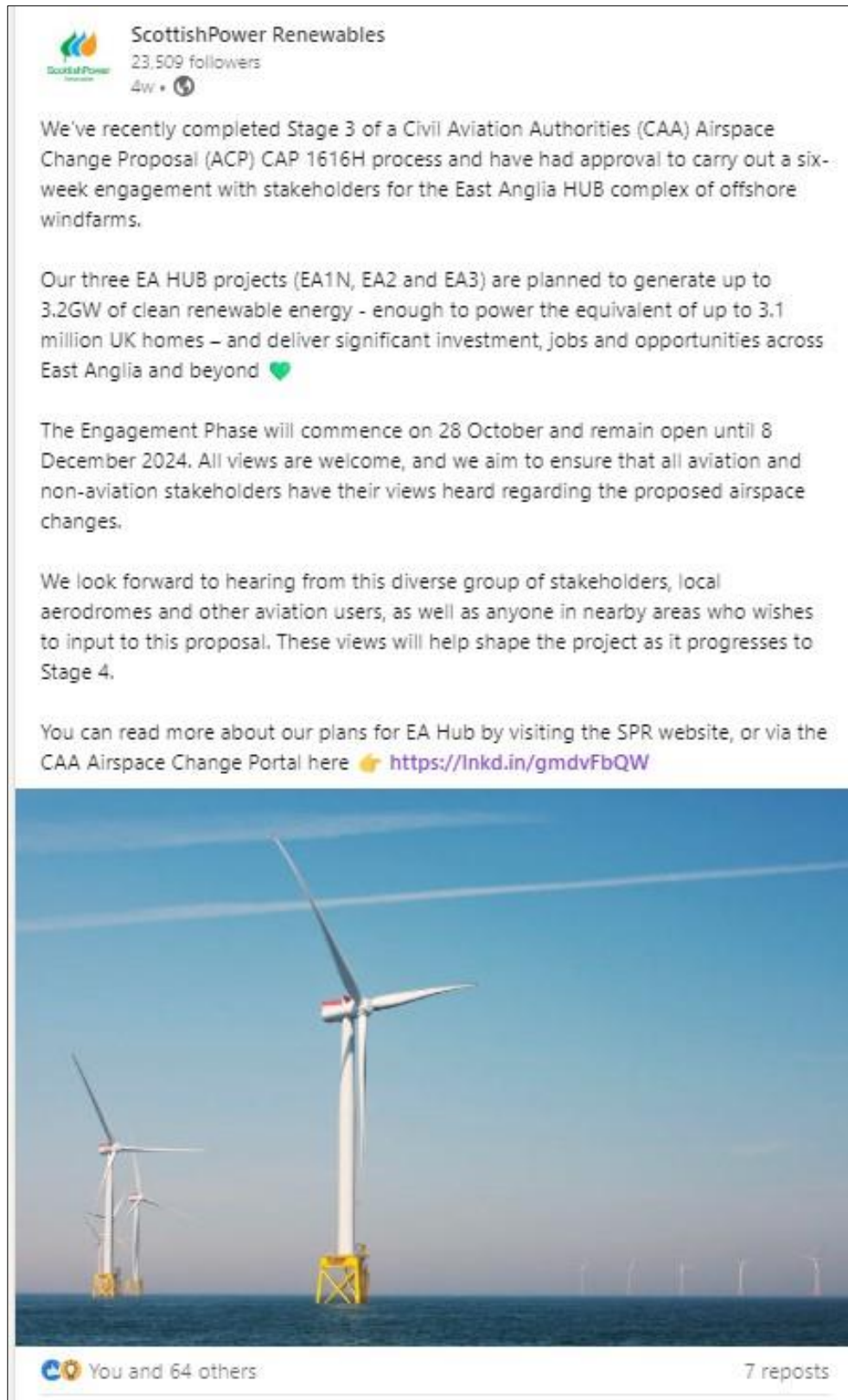
All feedback is valuable, whether you support, object or are indifferent to this airspace proposal.



We look forward to hearing from you soon.

Kind regards,




A9.3 LinkedIn Engagement Notification




 **ScottishPower Renewables**
23,509 followers
4w • 


We've recently completed Stage 3 of a Civil Aviation Authorities (CAA) Airspace Change Proposal (ACP) CAP 1616H process and have had approval to carry out a six-week engagement with stakeholders for the East Anglia HUB complex of offshore windfarms.



Our three EA HUB projects (EA1N, EA2 and EA3) are planned to generate up to 3.2GW of clean renewable energy - enough to power the equivalent of up to 3.1 million UK homes – and deliver significant investment, jobs and opportunities across East Anglia and beyond 

The Engagement Phase will commence on 28 October and remain open until 8 December 2024. All views are welcome, and we aim to ensure that all aviation and non-aviation stakeholders have their views heard regarding the proposed airspace changes.

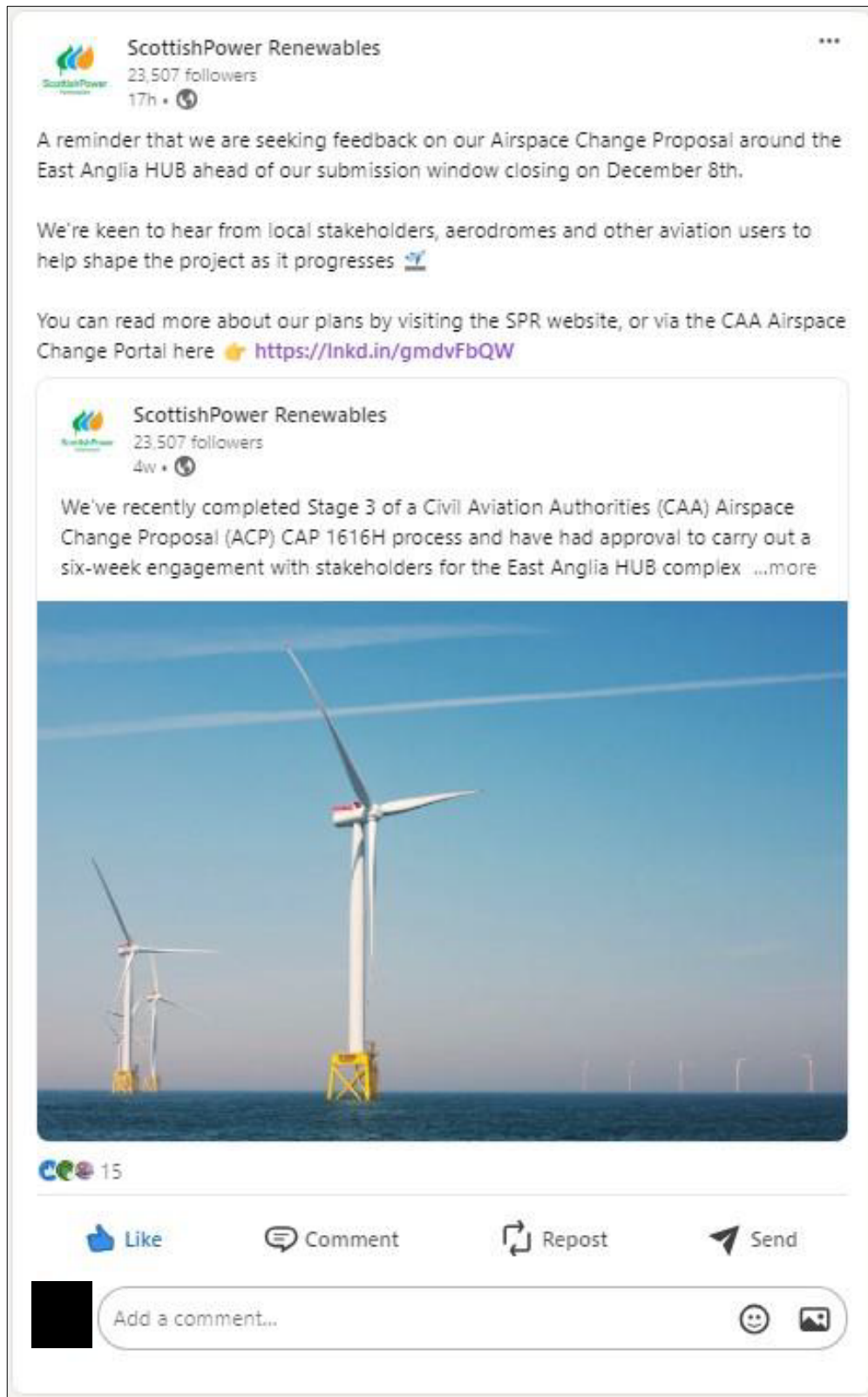
We look forward to hearing from this diverse group of stakeholders, local aerodromes and other aviation users, as well as anyone in nearby areas who wishes to input to this proposal. These views will help shape the project as it progresses to Stage 4.

You can read more about our plans for EA Hub by visiting the SPR website, or via the CAA Airspace Change Portal here  <https://lnkd.in/gmdvFbQW>



  You and 64 others 7 reposts

A9.4 LinkedIn Engagement Reminder



The screenshot shows a LinkedIn post from the official page of ScottishPower Renewables. The post is dated 17 hours ago and has 23,507 followers. The text of the post reads: "A reminder that we are seeking feedback on our Airspace Change Proposal around the East Anglia HUB ahead of our submission window closing on December 8th. We're keen to hear from local stakeholders, aerodromes and other aviation users to help shape the project as it progresses [airplane icon]. You can read more about our plans by visiting the SPR website, or via the CAA Airspace Change Portal here [link icon] <https://lnkd.in/gmdvFbQW>". Below the text is a smaller version of the same post, dated 4 weeks ago, which includes a photo of several offshore wind turbines in the sea. The photo shows a large white wind turbine in the foreground with a yellow base, and several other similar turbines in the distance under a clear blue sky. Below the photo are 15 reactions (likes) and a comment section with a text input field that says "Add a comment..." and icons for emojis and image uploads.

A10 Stage 3 Engagement - Document

FOR PUBLIC RELEASE



East Anglia Hub Wind Farmss

ACP-2023-079

Engagement Document

Date: 22nd October 2024

Author: [REDACTED]

Revision: 2024 Issue 1

Osprey Ref: 72039 002

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01172 422533 / enquiries@ospreyconsulting.co.uk
Registered in England and Wales under No: 06034579



FOR PUBLIC RELEASE

A11 Stage 3 Engagement – Record

Stakeholder Organisation	Representative(s)	Engagement Type	Date	Remarks
National Air Traffic Management Advisory Committees (NATMAC)				
Airlines UK	██████████ (██████████@airlinesuk.org)	Initial Engagement Email - Initial DPs	28 October 2024	No Response
	██████████ (██████████@airlinesuk.org)	Reminder Email	29 November 2024	No Response
Airport Operators Association (AOA)	██████████ (██████████@aoa.org.uk)	Initial Engagement Email - Initial DPs	28 October 2024	No Response
	██████████ (██████████@aoa.org.uk)	Reminder Email	29 November 2024	No Response
Airfield Operators Group (AOG)	██████████ (██████████@goodwood.com)	Initial Engagement Email - Initial DPs	28 October 2024	No Response
	CC only: ██████████ (██████████@bartaby.org)	Reminder Email	29 November 2024	No Response
Aircraft Owners and Pilots Association (AOPA)	██████████ (██████████@aopa.co.uk)	Initial Engagement Email - Initial DPs	28 October 2024	No Response
		Reminder Email	29 November 2024	No Response
Airspace Change Organising Group (ACOG)	██████████ (██████████@acog.aero)	Initial Engagement Email - Initial DPs	28 October 2024	No Response
		Reminder Email	29 November 2024	No Response
Association of Remotely Piloted Aircraft Systems UK (ARPAS-UK)	██████████ (██████████@arpas.uk)	Initial Engagement Email - Initial DPs	28 October 2024	See Annex A12.5
		Reminder Email	29 November 2024	See Annex A12.5
Aviation Environment Federation (AEF)	██████████ ██████████ @aef.org.uk	Initial Engagement Email - Initial DPs	28 October 2024	No Response
	██████████ @aef.org.uk (Alternative email)	Reminder Email	29 November 2024	No Response

Stakeholder Organisation	Representative(s)	Engagement Type	Date	Remarks
British Airways (BA)	Capt [REDACTED] ([REDACTED]@ba.com)	Initial Engagement Email- Engagement Document	28 October 2024	No Response
		Reminder Email	29 November 2024	No Response
BAe Systems	[REDACTED] [REDACTED]@baesystems.com)	Initial Engagement Email- Engagement Document	28 October 2024	No Response
		Reminder Email	29 November 2024	No Response
British Airline Pilots Association (BALPA)	[REDACTED] ([REDACTED]@balpa.org) [REDACTED] ([REDACTED]@balpa.org)	Initial Engagement Email- Engagement Document	28 October 2024	No Response
		Reminder Email	29 November 2024	No Response
British Balloon and Airship Club	[REDACTED] ([REDACTED]@btinternet.com)	Initial Engagement Email- Engagement Document	28 October 2024	No Response
		Reminder Email	29 November 2024	No Response
British Business and General Aviation Association (BBGA)	[REDACTED] ([REDACTED]@bbga.aero)	Initial Engagement Email- Engagement Document	28 October 2024	No Response
		Reminder Email	29 November 2024	No Response
British Gliding Association (BGA)	[REDACTED] ([REDACTED]@gliding.co.uk)	Initial Engagement Email- Engagement Document	28 October 2024	See Annex A12.1
British Helicopter Association (BHA)	[REDACTED] ([REDACTED]@britishhelicopterassociation.org)	Initial Engagement Email- Engagement Document	29 November 2024	See Annex A12.2
British Microlight Aircraft Association (BMAA)	[REDACTED] ([REDACTED]@bmaa.org) [REDACTED] ([REDACTED]@gmail.com)	Initial Engagement Email- Engagement Document	28 October 2024	No Response
		Reminder Email	29 November 2024	No Response

Stakeholder Organisation	Representative(s)	Engagement Type	Date	Remarks
British Skydiving	██████████ (██████████@britishskydiving.org)	Initial Engagement Email- Engagement Document	28 October 2024	No Response
		Reminder Email	29 November 2024	No Response
Drone Major	██████████ ██████████@dronemajorgroup.com CC Only: ██████████ ██████████@dronemajorgroup.com Alternative: ██████████@thecommunicationgroup.co.uk	Initial Engagement Email- Engagement Document	28 October 2024	No Response
		Reminder Email	29 November 2024	No Response
General Aviation Alliance (GAA)	██████████ (██████████@gaalliance.org.uk) CC Only: ██████████ (██████████@yahoo.co.uk)	Initial Engagement Email- Engagement Document	28 October 2024	No Response
		Reminder Email	29 November 2024	No Response
Guild of Air Traffic Control Officers (GATCO)	██████████ ██████████@gatco.org ██████████@gatco.org (Alternative email)	Initial Engagement Email- Engagement Document	28 October 2024	No Response
		Reminder Email	29 November 2024	No Response
Honourable Company of Air Pilots (HCAP)	██████████ (██████████@airpilots.org)	Initial Engagement Email- Engagement Document	28 October 2024	No Response
		Reminder Email	29 November 2024	No Response
Helicopter Club of Great Britain (HCGB)	██████████ (██████████@ryelands.net) (Alt Email: ██████████@ryelands.net)	Initial Engagement Email- Engagement Document	28 October 2024	No Response
		Reminder Email	29 November 2024	No Response
Isle of Man CAA	██████████ (██████████@gov.im)	Initial Engagement Email- Engagement Document	28 October 2024	No Response
		Reminder Email	29 November 2024	No Response

Stakeholder Organisation	Representative(s)	Engagement Type	Date	Remarks
Light Aircraft Association (LAA)	██████████ (██████████@laa.uk.com)	Initial Engagement Email- Engagement Document	28 October 2024	No Response
		Reminder Email	29 November 2024	No Response
Low Fare Airlines	██████████ (██████████@easyjet.com)	Initial Engagement Email- Engagement Document	28 October 2024	No Response
		Reminder Email	29 November 2024	No Response
Military Aviation Authority (MAA)	Cdr ██████████ ██████████@mod.gov.uk)	Initial Engagement Email- Engagement Document	28 October 2024	No Response
		Reminder Email	29 November 2024	No Response
Ministry of Defence - Defence Airspace and Air Traffic Management (MoD DAATM)	Gp Capt ██████████ ██████████@mod.gov.uk) (Alt Email: ██████████@mod.gov.uk)	Initial Engagement Email- Engagement Document	28 October 2024	See Annex A12.6
		Reminder Email	29 November 2024	See Annex A12.6
NATS	██████████ (██████████@nats.co.uk) ██████████ (██████████@nats.co.uk)	Initial Engagement Email- Engagement Document	28 October 2024	See Annex A12.7
		Reminder Email	29 November 2024	See Annex A12.7
Navy Command HQ	Lt Cdr ██████████ ██████████@mod.gov.uk) Lt Cdr ██████████ ██████████@mod.gov.uk)	Initial Engagement Email- Engagement Document	28 October 2024	No Response
		Reminder Email	29 November 2024	No Response
PPL/IR (Europe)	██████████ (██████████@pplir.org) (Alternative Email: ██████████@tdn.email)	Initial Engagement Email- Engagement Document	28 October 2024	No Response
		Reminder Email	29 November 2024	No Response

Stakeholder Organisation	Representative(s)	Engagement Type	Date	Remarks
UK Airprox Board (UKAB)	██████████ (██████████@airproxboard.org.uk) CC Only: ██████████@airproxboard.org.uk	Initial Engagement Email- Engagement Document	28 October 2024	No Response
		Reminder Email	29 November 2024	No Response
UK Flight Safety Committee (UKFSC)	██████████ (██████████@ukfsc.co.uk)	Initial Engagement Email- Engagement Document	28 October 2024	No Response
		Reminder Email	29 November 2024	No Response
United States Visiting Forces (USVF), HQ United States Country Rep-UK (HQ USCR-UK).	██████████@us.af.mil)	Initial Engagement Email- Engagement Document	28 October 2024	No Response
		Reminder Email	29 November 2024	No Response
Other Identified Stakeholders				
Luchtverkeersleiding Nederland (LVNL)	General Enquiries ██████████@lvnl.nl	Initial Engagement Email- Engagement Document	28 October 2024	No Response
		Reminder Email	29 November 2024	No Response
Bristow Helicopters	██████████ (██████████@bristowgroup.com)	Initial Engagement Email- Engagement Document	28 October 2024	No Response
		Reminder Email	29 November 2024	No Response
CHC Helicopter	██████████ (██████████@chcheli.com)	Initial Engagement Email- Engagement Document	28 October 2024	See Annex A12.1
		Reminder Email	29 November 2024	See Annex A12.1
NHV	██████████ (██████████@nhv.be)	Initial Engagement Email- Engagement Document	28 October 2024	No Response
		Reminder Email	29 November 2024	No Response

Stakeholder Organisation	Representative(s)	Engagement Type	Date	Remarks
Offshore Helicopters	██████████ ██████████@offshoreheli-uk.com)	Initial Engagement Email- Engagement Document	28 October 2024	No Response
		Reminder Email	29 November 2024	No Response
Search and Rescue (Bristow Helicopters)	██████████ (██████████@bristowgroup.com)	Initial Engagement Email- Engagement Document	28 October 2024	No Response
		Reminder Email	29 November 2024	No Response
Police Scotland and Air Ambulance (Babcock Mission Critical Services)	██████████ (██████████@babcockinternational.com)	Initial Engagement Email- Engagement Document	28 October 2024	No Response
		Reminder Email	29 November 2024	No Response
Northern Lighthouse (PDG Helicopters)	██████████ (██████████@pdgaviation.com)	Initial Engagement Email- Engagement Document	28 October 2024	No Response
		Reminder Email	29 November 2024	No Response
Air Ambulance (Gama Aviation)	██████████ (██████████@gamaaviation.com)	Initial Engagement Email- Engagement Document	28 October 2024	No Response
		Reminder Email	29 November 2024	No Response
Norwich Airport	Norwich Airport Operations (██████████@norwichairport.co.uk)	Initial Engagement Email- Engagement Document	28 October 2024	See Annex A12.3
		Reminder Email	29 November 2024	See Annex A12.3
Southend Airport	Southend Airport ATC (██████████@southendairport.com, Alternative email: ██████████@londonouthendairport.com (Administration))	Initial Engagement Email- Engagement Document	28 October 2024	No Response
		Reminder Email	29 November 2024	No Response

Table 7 - Stage 3 Engagement Record

A11.1 Engagement Email Delivery Issues

Table 6 below shows those stakeholders we reached out to but received a failed delivery notification. Annotated in blue is the alternative email address which was then used.

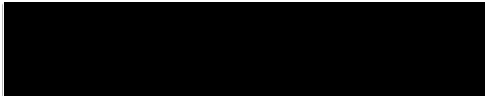
Stakeholder Organisation	Representative(s)	Engagement Type	Date	Remarks
London Southend Airport	██████████@southendairport.com	Initial Engagement Email- Engagement Document	28 October 2024	No Response
	██████████@londonouthendairport.com	Reminder Email	29 November 2024	No Response
Easy Jet	██████████ (██████████@aef.org.uk)	Initial Engagement Email- Engagement Document	28 October 2024	No Response
	██████████@aef.org.uk	Reminder Email	29 November 2024	No Response
British Microlight Aircraft Association (BMAA)	██████████ (██████████@bmaa.org)	Initial Engagement Email- Engagement Document		No Response
	██████████ (██████████@gmail.com)	Reminder Email		No Response
Drone Major	██████████ (██████████@dronemajorgroup.com)	Initial Engagement Email- Engagement Document		No Response
	CC Only: ██████████ ██████████@dronemajorgroup.com ██████████@thecommunicationgroup.co.uk	Reminder Email		No Response
Guild of Air Traffic Control Officers (GATCO)	██████████ (██████████@gatco.org)	Initial Engagement Email- Engagement Document		No Response
	██████████@gatco.org	Reminder Email		No Response

Table 8 - Stage 3 Engagement Email Delivery Issues

A12 Stage 3 Engagement – Response

A12.1 BGA Response

[EXTERNAL] RE: Airspace Change Proposal (ACP-2023-079) - SPR (UK) Ltd - East Anglia Hub Windfarms Mitigation - Stage 3 – Engage...



Fri 25/10/2024 17:10

Unclassified

i Follow up. Start by 28 October 2024. Due by 28 October 2024.
You forwarded this message on 28/10/2024 10:14.

UNCLASSIFIED

CAUTION: This email originated from outside of the organisation. Do not follow guidance, click links, or open attachments unless you recognise the sender and know the content is safe. [Learn why this is important](#)

Thanks for the engagement. This offshore related ACP as described does not impact gliding operations.

Kind regards



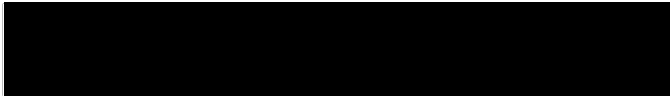


FOR PUBLIC RELEASE



A12.2 BHA Response

[EXTERNAL] RE: Airspace Change Proposal (ACP-2023-079) - SPR (UK) Ltd - East Anglia Hub Windfarms Mitigation - Stage 3 – Engage...



↩ Reply
↩ Reply All
→ Forward
⋮

Mon 28/10/2024 09:52

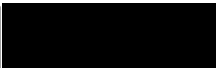
🛡️ Unclassified

📌 Follow up. Start by 28 October 2024. Due by 28 October 2024.
You forwarded this message on 28/10/2024 10:10.

UNCLASSIFIED

CAUTION: This email originated from outside of the organisation. Do not follow guidance, click links, or open attachments unless you recognise the sender and know the content is safe. [Learn why this is important](#)

The BHA currently has no objection to the ACP



British Helicopter Association
Unit C2
Fairoaks Airport
Chobham
Surrey. GU24 8HU

Office:
Mobile:
www.britishhelicopterassociation.org

FOR PUBLIC RELEASE



A12.3 Norwich Airport Response

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Your Name:	[REDACTED]
Your Postcode:	NR10 3GJ
Your Email Address:	[REDACTED]@norwichairport.co.uk
Select one of the following boxes and check as applicable:	
I am responding as an individual: <input type="radio"/>	I am responding on behalf of an organisation: <input checked="" type="radio"/> Organisation Name: Norwich Airport Position in Organisation: [REDACTED]
If you wish your response to be published anonymously your personal details will be redacted and only be seen by the CAA.	
Yes <input type="radio"/> I want my response to be published with my details.	No <input checked="" type="radio"/> I want my response to be published anonymously.
Feedback Section	
Do you agree that the Design Principle Evaluation was conducted appropriately in line with CAP 1616H?	
Yes <input checked="" type="radio"/>	No <input type="radio"/>
Please provide further comment here if you answered 'No' to the above question.	



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After reviewing the available documentation , do you agree with the Change Sponsor (Scottish Power Renewables), that Options 13 and 15 were the only options which fulfilled the criterion for this Airspace Change Proposal?	
Yes <input checked="" type="radio"/>	No <input type="radio"/>
<i>Please provide further comment here if you answered 'No' to the above question.</i>	



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Do you support Option 13 (TMZ (2), RAG Blanking, Norfolk TMZ Overlap) of this Airspace Change Proposal?			
Support <input checked="" type="radio"/>	Neutral <input type="radio"/>	Object <input type="radio"/>	No Comment <input type="radio"/>
<p>If applicable, please provide comments on Options 13 to allow us to understand your thoughts on the introduction of this mitigation to the East Anglia Hub Wind Farm. Please consider:</p> <ul style="list-style-type: none"> • What do you believe will be the impact of the TMZs on your operation? • How often do you think these impacts will occur to you or others? • Do you have any suggested mitigations or design changes you think should be considered? • Do you think there may be any unintended consequences of the TMZs? <p>Nil impact on Norwich Airport operations envisaged.</p>			



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Do you support Option 15 (TMZ (2), RAG Blanking, FIR, Norfolk TMZ Overlap) of this Airspace Change Proposal?			
Support <input checked="" type="radio"/>	Neutral <input type="radio"/>	Object <input type="radio"/>	No Comment <input type="radio"/>
<p>If applicable, please provide comments on Options 15 to allow us to understand your thoughts on the introduction of this mitigation to the East Anglia Hub Wind Farm. Please consider:</p> <ul style="list-style-type: none"> • What do you believe will be the impact of the TMZs on your operation? • How often do you think these impacts will occur to you or others? • Do you have any suggested mitigations or design changes you think should be considered? • Do you think there may be any unintended consequences of the TMZs? <p>Nil impact on Norwich Airport operations envisaged.</p>			



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Additional Comments (optional)
Nil.



A12.4 CHC Helicopter Response

From: [REDACTED]@chcheli.com>
Sent: Tuesday, December 3, 2024 9:49 AM
To: [REDACTED]@ospreydsl.co.uk>
Subject: [EXTERNAL] RE: [External]:COMMERCIAL-IN-CONFIDENCE Airspace Change Proposal (ACP-2023-079) - SPR (UK) Ltd - East Anglia Hub Windfarms Mitigation - Stage 3 – Engagement Phase *****Midpoint Reminder*****

CAUTION: This email originated from outside of the organisation. Do not follow guidance, click links, or open attachments unless you recognise the sender and know the content is safe.
[Learn why this is important](#)

Hi [REDACTED]

No comments. Option 13 or 15 look the most reasonable and these are being put forward for approval.

Kind Regards

[REDACTED]

A12.5 ARPAS UK Response

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Your Name:	Rupert
Your Postcode:	OX18 2LW
Your Email Address:	██████████@arpas.uk
Select one of the following boxes and check as applicable:	
I am responding as an individual: <input type="radio"/>	I am responding on behalf of an organisation: <input checked="" type="radio"/> Organisation Name: ARPAS UK Position in Organisation: Member
If you wish your response to be published anonymously your personal details will be redacted and only be seen by the CAA.	
Yes <input checked="" type="radio"/> I want my response to be published with my details.	No <input type="radio"/> I want my response to be published anonymously.
Feedback Section	
Do you agree that the Design Principle Evaluation was conducted appropriately in line with CAP 1616H?	
Yes <input checked="" type="radio"/>	No <input type="radio"/>
<i>Please provide further comment here if you answered 'No' to the above question.</i>	



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<p>After reviewing the available documentation, do you agree with the Change Sponsor (Scottish Power Renewables), that Options 13 and 15 were the only options which fulfilled the criterion for this Airspace Change Proposal?</p>	
<p>Yes <input checked="" type="radio"/></p>	<p>No <input type="radio"/></p>
<p><i>Please provide further comment here if you answered 'No' to the above question.</i></p>	



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Do you support Option 13 (TMZ (2), RAG Blanking, Norfolk TMZ Overlap) of this Airspace Change Proposal?			
Support <input type="radio"/>	Neutral <input type="radio"/>	Object <input type="radio"/>	No Comment <input checked="" type="radio"/>
<p>If applicable, please provide comments on Options 13 to allow us to understand your thoughts on the introduction of this mitigation to the East Anglia Hub Wind Farm. Please consider:</p> <ul style="list-style-type: none">• What do you believe will be the impact of the TMZs on your operation?• How often do you think these impacts will occur to you or others?• Do you have any suggested mitigations or design changes you think should be considered?• Do you think there may be any unintended consequences of the TMZs?			



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Do you support Option 15 (TMZ (2), RAG Blanking, FIR, Norfolk TMZ Overlap) of this Airspace Change Proposal?			
Support <input type="radio"/>	Neutral <input type="radio"/>	Object <input type="radio"/>	No Comment <input checked="" type="radio"/>
<p>If applicable, please provide comments on Options 15 to allow us to understand your thoughts on the introduction of this mitigation to the East Anglia Hub Wind Farm. Please consider:</p> <ul style="list-style-type: none">• What do you believe will be the impact of the TMZs on your operation?• How often do you think these impacts will occur to you or others?• Do you have any suggested mitigations or design changes you think should be considered?• Do you think there may be any unintended consequences of the TMZs?			

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Additional Comments (optional)

A12.6 DAATM Response

East Anglia Hub Airspace Change Proposal – [View Our Documents](#)



Your Name:	[REDACTED]
Your Postcode:	RH6 0YR
Your Email Address:	[REDACTED]@mod.gov.uk
Select one of the following boxes and check as applicable:	
I am responding as an individual: <input type="radio"/>	I am responding on behalf of an organisation: <input checked="" type="radio"/> Organisation Name: Ministry of Defence Position in Organisation: DAATM
If you wish your response to be published anonymously your personal details will be redacted and only be seen by the CAA.	
Yes <input type="radio"/> I want my response to be published with my details.	No <input checked="" type="radio"/> I want my response to be published anonymously.
Feedback Section	
Do you agree that the Design Principle Evaluation was conducted appropriately in line with CAP 1616H?	
Yes <input type="radio"/>	No <input checked="" type="radio"/>
<p><i>Please provide further comment here if you answered 'No' to the above question.</i></p> <p>The MOD does not wish to comment on sponsor compliance with the CAP1616 process, which is for the CAA to determine. 'No' selected as there is no option for N/A.</p>	



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<p>After reviewing the available documentation, do you agree with the Change Sponsor (Scottish Power Renewables), that Options 13 and 15 were the only options which fulfilled the criterion for this Airspace Change Proposal?</p>	
<p>Yes <input checked="" type="radio"/></p>	<p>No <input type="radio"/></p>
<p><i>Please provide further comment here if you answered 'No' to the above question.</i></p>	



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Do you support Option 13 (TMZ (2), RAG Blanking, Norfolk TMZ Overlap) of this Airspace Change Proposal?

Support <input type="radio"/>	Neutral <input type="radio"/>	Object <input checked="" type="radio"/>	No Comment <input type="radio"/>
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If applicable, please provide comments on Options 13 to allow us to understand your thoughts on the introduction of this mitigation to the East Anglia Hub Wind Farm. Please consider:

- What do you believe will be the impact of the TMZs on your operation?
- How often do you think these impacts will occur to you or others?
- Do you have any suggested mitigations or design changes you think should be considered?
- Do you think there may be any unintended consequences of the TMZs?

Full comments that cover both options are in the additional comments section as they did not fit in this box.



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Do you support Option 15 (TMZ (2), RAG Blanking, FIR, Norfolk TMZ Overlap) of this Airspace Change Proposal?			
Support <input type="radio"/>	Neutral <input type="radio"/>	Object <input checked="" type="radio"/>	No Comment <input type="radio"/>
<p>If applicable, please provide comments on Options 15 to allow us to understand your thoughts on the introduction of this mitigation to the East Anglia Hub Wind Farm. Please consider:</p> <ul style="list-style-type: none"> • What do you believe will be the impact of the TMZs on your operation? • How often do you think these impacts will occur to you or others? • Do you have any suggested mitigations or design changes you think should be considered? • Do you think there may be any unintended consequences of the TMZs? <p>Full comments that cover both options are in the additional comments section as they did not fit in this box.</p>			

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Additional Comments (optional)

What do you believe will be the impact of the TMZs on your operation?

AARA 9

1.Implementation of TMZs with associated blanking could impact safe ATS provision to air-to-air refuelling aircraft, due to overlap with AARA 9. Aircraft are required to have their transponder switched off for the period of joining, refuelling and departing the control of the refuelling aircraft. For aircraft departing the tanker, this would generate a delay in detection and reduce the ability of 78/19 Sqn to provide a safe and efficient ATS.

ATS Provision - General

2.If the TMZs are approved, the radars affected by the wind turbines would be subject to additional processing including blanking. This would result in a lack of primary surveillance within the proposed TMZs, which would reduce the effectiveness of any radar service being provided through and around them. Radar services would be reduced/limited due to the lack of primary surveillance coverage and thus aircrew would not be informed of any non-squawking aircraft in the affected areas. The airspace environment is Class G airspace and the military are not the only airspace users, so non-squawking aircraft could present a hazard that the aircrew could be unaware of.

3.Aircraft crossing the FIR boundary would be expected to transfer to /from military control in this area, including formations of aircraft that often separate into separate speaking units, with a staggered selection of transponders. The workload to do this with limited or blanked primary coverage would increase as a result of delays in identifying aircrafts until they have all repositioned and are all transponding, with the potential for mis-identification to be increased on the TMZ boundaries.

4.The TMZ could also cause an undesirable increase in workload for 78 Sqn controllers due to the increase in complexity, increased difficulty in maintaining track identification when jets are manoeuvring SSR alone, and should they be the controlling authority non-SSR crossing requests may reduce capacity. It should be noted that given the position and likely height of the TMZs, 78 Sqn would consider being nominated as the controlling authority for them (perhaps sharing that authority with Anglia Radar in a similar manner as happens elsewhere). However, that statement should not in any way however give any implicit (or explicit) support to the implementation of the TMZs.

5.During an Air Policing scenario, the TMZ could make maintenance of track identification more difficult for ASACS (and ATC monitoring the ATC aspects of the situation) as the target aircraft could be non-squawking. However, noting the block SFC-FL100, it is relatively unlikely a situation would require transit through the TMZ, unless a refuelling asset was to be placed in AARA 9. If that was to be the case then tactical manoeuvring may be required if the TMZ environment is not suitable.

Lakenheath ATA

6.It is anticipated that just the NATS Cromer radar would be subject to primary surveillance blanking associated with the TMZs. On that basis, PSR loss over portions of the EA3 area would extend above 16500'. EA3 lies directly below the Lakenheath ATA - a volume of airspace extending down to FL50 - used heavily by US F15 and F35 aircraft. During their operations in the area it is not uncommon for them to manoeuvre vigorously and, in turn, it is not uncommon in the course of such activity for transponder codes to temporarily drop off. If the Cromer PSR was blanked it is highly likely that the controllers providing a service to such aircraft would not be able to see them - and thus consequently be unable to provide any form of radar service. It is also routine for only the lead aircraft in a formation to squawk, so the other members of the flight would similarly be invisible to the controller. Whilst this would have no real impact in normal close-formation flying, should the other pilots spread out, or lose visual contact with the lead aircraft for whatever reason, then there are potential air safety implications as the controller cannot provide any deconfliction - or even information - on such aircraft under these circumstances.

78 Sqn Coverage

7.There remains some doubt as to which NATS radars would require blanking as a consequence of these windfarms. The Cromer would definitely be blanked, but the other radars that provide coverage over the area are theoretically untroubled as their base of cover is too high to 'see' the turbines. However, previous experience has led NATS to conclude that atmospheric conditions can change that and create clutter - thus meaning that even those radars further away might still need to be blanked. If only the Cromer is blanked the impact for 78 Sqn is only for EA3; however, if it is determined that other radar require blanking then the impact would be for the entire development.

How often do you think these impacts will occur to you or others?

8.AARA 9 is not as regularly used as some other refuelling areas due to its location and altitude; however, lack of familiarity with the area could increase the impact when it does get used. Use of the Lakenheath ATA by USAF jets is on a daily basis (Mon-Fri) for most of the normal working day.

9.The MOD would like to see analysis from the sponsor regarding how often non-squawking traffic transits the confines of the proposed TMZs, to understand how often requests might be received for transit, assuming that the ACP is approved and MOD agree to act as the Controlling Authority.

Do you have any suggested mitigations or design changes you think should be considered?

10.The only feedback was that Option 15 would avoid a gap against the FIR boundary, which could prevent confusion; however, MOD has no preference for designs.

Do you think there may be any unintended consequences of the TMZs?

11.From a wider safeguarding perspective, use of a TMZ as a mitigation in this instance could increase the potential for an expansion of TMZ use and set precedence, leaving the MOD open to wider challenge from developers for why a TMZ proposal in another location would not be tolerated. TMZs should not be the enduring solution to mitigate the effects on sensors - a technical solution should be the long term aspiration for all parties.

Any other impacts/considerations?

12.The impacts of these windfarm developments to Air Defence radars are planned to be mitigated through an alternative programme for technical radar mitigation.

13.The objection that 78 Sqn have made through NATS as a customer of their surveillance data, is predicated on current equipment. There is a plan in place for the Cromer radar to be replaced with an equivalent radar that promises much better performance over this area, with post windfarm development PSR coverage potentially down to 6-7000'. Whilst this wouldn't negate their objection it would reduce the severity of the impact. The new radar is planned to be operational by 2027/2028, so if the turbine construction does not begin until that point the impact on MOD could be reduced.

14.TMZ close to the FIR boundary and associated primary blanking would leave a large area with limited coverage for primary radar, and the TMZ approval would not be desirable for ASACS until their technical mitigation programme delivers. Ideally, no blades would be hung until a full Radar Mitigation Scheme Agreement (RMSA) is in place to cover both MOD interests for Air Defence radars and MOD interests for ATC via NATS radars.

15.Due to the impacts on MOD airspace users and ATS provision identified through engagement with MOD stakeholders, the MOD does not support this proposal for a TMZ. There is no option for 'not support' and MOD does not consider itself to be 'neutral' on this proposal, therefore 'object' was the most suitable option. Whilst it is acknowledged that blanking and a TMZ would mitigate the effects of the wind turbines on radar sensors, it will have a negative impact on MOD activities

A12.7 NATS Response

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Your Name:	[REDACTED]
Your Postcode:	PO15 7FL
Your Email Address:	[REDACTED]@nats.co.uk
Select one of the following boxes and check as applicable:	
I am responding as an individual: <input type="radio"/>	I am responding on behalf of an organisation: <input checked="" type="radio"/> Organisation Name: NATS Position in Organisation: OperationalPolicy
If you wish your response to be published anonymously your personal details will be redacted and only be seen by the CAA.	
Yes <input type="radio"/> I want my response to be published with my details.	No <input checked="" type="radio"/> I want my response to be published anonymously.
Feedback Section	
Do you agree that the Design Principle Evaluation was conducted appropriately in line with CAP 1616H?	
Yes <input checked="" type="radio"/>	No <input type="radio"/>
Please provide further comment here if you answered 'No' to the above question.	



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<p>After reviewing the available documentation, do you agree with the Change Sponsor (Scottish Power Renewables), that Options 13 and 15 were the only options which fulfilled the criterion for this Airspace Change Proposal?</p>	
<p>Yes <input checked="" type="radio"/></p>	<p>No <input type="radio"/></p>
<p><i>Please provide further comment here if you answered 'No' to the above question.</i></p>	



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Do you support Option 13 (TMZ (2), RAG Blanking, Norfolk TMZ Overlap) of this Airspace Change Proposal?			
Support <input checked="" type="radio"/>	Neutral <input type="radio"/>	Object <input type="radio"/>	No Comment <input type="radio"/>
<p>If applicable, please provide comments on Options 13 to allow us to understand your thoughts on the introduction of this mitigation to the East Anglia Hub Wind Farm. Please consider:</p> <ul style="list-style-type: none">• What do you believe will be the impact of the TMZs on your operation?• How often do you think these impacts will occur to you or others?• Do you have any suggested mitigations or design changes you think should be considered?• Do you think there may be any unintended consequences of the TMZs?			

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Do you support Option 15 (TMZ (2), RAG Blanking, FIR, Norfolk TMZ Overlap) of this Airspace Change Proposal?			
Support <input type="radio"/>	Neutral <input type="radio"/>	Object <input type="radio"/>	No Comment <input checked="" type="radio"/>
<p>If applicable, please provide comments on Options 15 to allow us to understand your thoughts on the introduction of this mitigation to the East Anglia Hub Wind Farm. Please consider:</p> <ul style="list-style-type: none">• What do you believe will be the impact of the TMZs on your operation?• How often do you think these impacts will occur to you or others?• Do you have any suggested mitigations or design changes you think should be considered?• Do you think there may be any unintended consequences of the TMZs?			

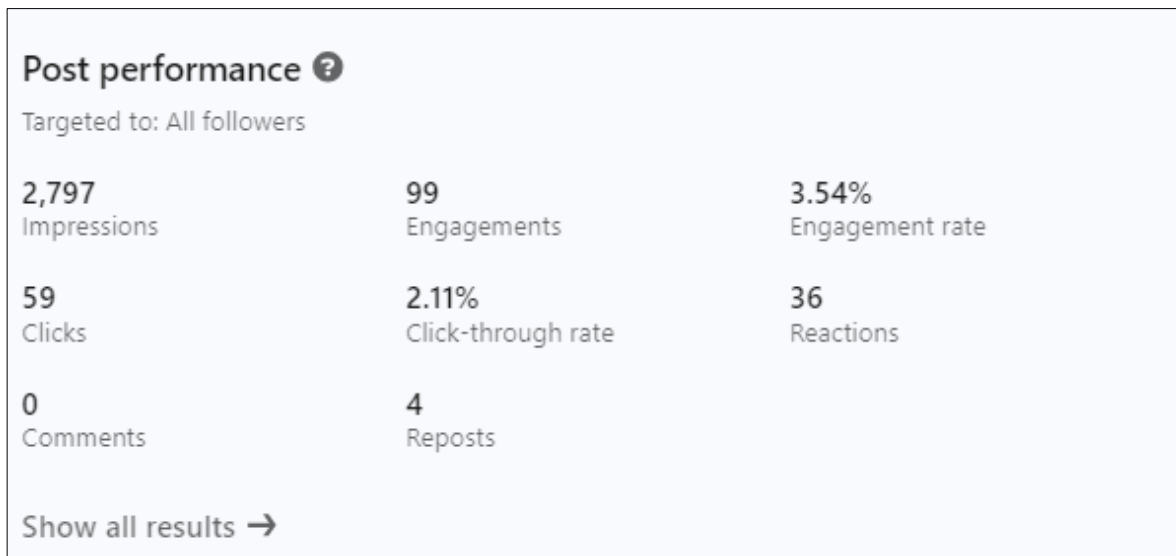
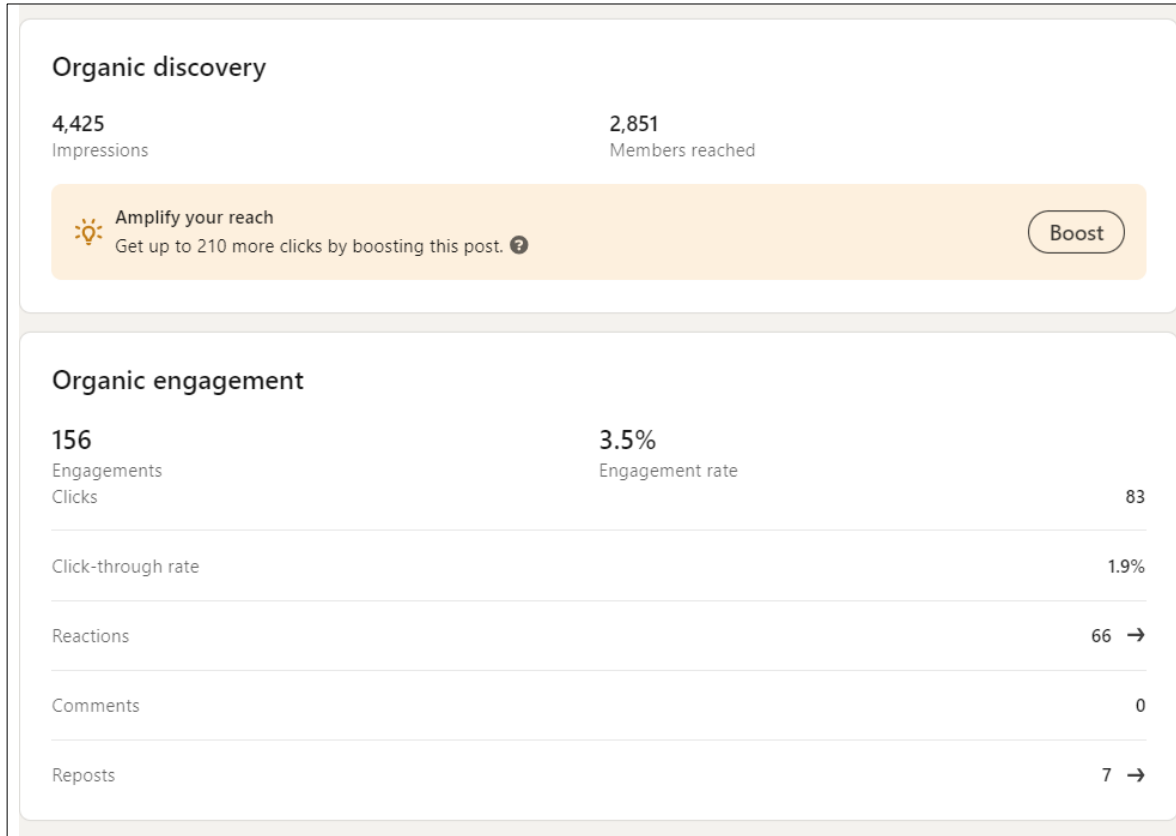
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Additional Comments (optional)

Our preference would be for option 13 to reduce the impact on GA

A13 Stage 3 LinkedIn Engagement Responses



A14 Stage 3 X Engagement Responses

