



Ministry
of Defence

Defence Airspace and Air Traffic Management
CAA House
45-59 Kingsway
London
WC2B 6TE

Telephone: +44 (0)207 453 6574
Email: daatm-airspaceConsultation@mod.gov.uk

COMBAT AIR – TRAINING AIRSPACE

CAP1616 Stage 3A Consultation Strategy

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1. Introduction

1.1 This document forms part of the document set required in accordance with the requirements of the CAP1616 airspace change process and aims to provide adequate evidence to satisfy Stage 3 Consult Gateway - Step 3A.

1.2 Previous documents have reduced the number of design concepts to one, albeit this option has been developed through an iterative process involving engagement with key stakeholders. This proposal uses existing airspace structures, expanding on the already existing EGD323, and is the preferred option. The “do nothing” option has been discounted as it does not meet the key design principle requirements, specifically as it does not provide a suitable portion of airspace for modern combat aircraft to train within. There is still scope for feedback on the specific details of the concept option upon which we are consulting. The preferred option may be refined based on responses provided through Stage 3 consultation.

2. Engagement Activities Completed to Date

2.1 DAATM, as the lead for this ACP, has conducted continuous engagement with NATS, the Combat Air community (both UK & US) and with wider MOD stakeholders via the MAUWG over the last 18 months. This ACP is derived from the on-going work conducted by the Flexible Use of Airspace State Programme (FSP). In addition to the routine FSP Steering Group meetings several MOD/NATS workshops have been held. Given the requirement and the likely location and levels of the final solution, stakeholder engagement for the generation of design principles has predominately been with NATS, airports and airlines.

2.2 Since the completion of the Stage 2 Design and Assess gateway, the MOD has continued engagement with key stakeholders. A summary of significant activities undertaken so far is below:

- 17 Nov 16: Lakenheath initial stakeholder engagement – NATS, CAA, MOD (DAATM, USAFE UK, Typhoon, F35, Tornado)
- 14 Dec 16: FASIIG 24
- 23 Feb 17: UK/USAFE F35 Working Group
- 15 Mar 17: FASIIG 25
- 4 Apr 17: FSP Feasibility and Options Working Group – NATS, MOD
- 25 Apr 17: FSP Feasibility and Options Working Group – NATS, MOD
- 23 May 17: MAUWG 3
- 8 Jun 17: F35 Military stakeholder engagement
- 21 Jun 17: FASIIG 26
- 20 Sep: FASIIG 27
- 10 Oct 17: FSP stakeholder meeting
- 17 Oct 17: Combat Air airspace options telcon – USAFE UK, DAATM, Typhoon, Tornado
- 30 Oct 17: Combat Air Interoperability Working Group – USAFE, USAFE UK, HQ AIR, Typhoon, Tornado, F35, AWC, DAATM
- 1 Nov 17: MAUWG 4
- 30 Nov 17: FASIIG 28
- 4 Dec 17: FSP way forward – NATS, CAA, DAATM, F35, USAFE UK
- 16 Feb 18: Engagement Letter to airlines and airports
- 28 Feb 18: Combat Air Interoperability Working Group – USAFE, USAFE UK, HQ AIR, Typhoon, Tornado, F35, AWC, DAATM
- 2 Mar 18: FASDSG
- 22 Mar 18: FASIIG 29, project brief
- 9-10 Apr 18: Prestwick simulator airspace trial, NATS and MOD
- 18 Apr 18: Combat Air engagement event RAF Coningsby
- 25 Apr 18: Engagement Letter to airlines and airports
- 26 Apr 18: Engagement Letter BGA
- 17 May 18: MAUWG 5
- 23 May 18: Meeting to discuss post-simulator trial report and recommendations, NATS, MOD, FSP
- 5 Jun 18: Meeting with Newcastle Airport
- 7 Jun 18: JANSC
- 19 Jun 18: Meeting with NATS and ISTAR FHQ to discuss potential conflict with UK Orbit Areas
- 22 Jun 18: FASDSG
- 27 Jun 18: Engagement and update letter to extended stakeholder community
- 5 Jul 18: Updated Engagement letter sent to extended stakeholder community
- 11 Jul 18: Engagement letter with proposed design details sent to Northern Regional Airspace User Working Group

2.3 The FASIIG community was briefed on the ACP in Mar 18; whilst there was little feedback from the attendees, it was commented that the MOD was not managing current segregated airspace particularly well. This perception was echoed in feedback from Stage 1 and 2 engagement with stakeholders. It was explained to the FASIIG audience, which is backed up in ACP and FSP documentation, that the MOD is addressing some known inefficiencies in airspace management. This has been taken further since the FASIIG with the development of a series of trials to specifically improve tactical (Level 3) airspace management. To gain maximum capacity from the constrained UK airspace, there is also a requirement for other airspace users (principally those en-route) to ensure they can benefit from the opportunities presented when the MOD hands back previously segregated airspace.

2.4 The most recent engagement activities have continued to focus on refining the option for a redevelopment of EGD323. As such, NATS conducted a 2-day simulator trial of the latest proposed design in Apr 18, which included support and input from MOD personnel. The trial focussed on the flows of civil traffic and their interactions with military activities to assess the impacts of activating the larger volume of segregated airspace. Several recommendations were made following the trial; whilst many of these are internal to NATS, a few potential issues were highlighted that have required further MOD assessment, these issues have been resolved through adaptations to the design and changes to existing operational procedures.

2.5 Feedback was requested from Newcastle International Airport, DTVA, Humberside Airport, Norwich Airport and airlines to ascertain if there were any issues or concerns regarding the proposal.

2.6 A letter from Newcastle led to a meeting at the airport on 5 Jun 18 with the conclusion that there were no major concerns or showstoppers at this stage. A response from Humberside airport generated a discussion regarding the potential issue of combat aircraft departing segregated airspace at short notice into conflict with IFR traffic inbound to Humberside. The MOD has accepted that this is a concern and have addressed it within the proposal.

2.7 Feedback from Virgin and BA was centred on their perception that the MOD does not manage airspace efficiently. As highlighted above, the MOD accepts that efficient and effective ASM is a key aspect of improved FUA and work is already underway to introduce improvements in this area through this ACP and the FSP.

2.8 The engagement feedback we have received, coupled with the simulator trial work conducted by NATS, has been considered in the continuing evolution of the preferred option that will be taken forward for broader consultation in Stage 3.

2.9 The MOD wrote to an extended stakeholder community on 27 Jun 18 to commence engagement on a broader scale in advance of the public consultation and to update those who had already been asked to comment. Feedback relevant to the proposal will be included in the consultation material for consideration and further comment.

2.10 Following the latest engagement letter the MOD has discussed Durham Tees Valley's concerns and addressed them through raising the base level of some bookable airspace segments and extending the agreement to prevent military aircraft leaving segregated airspace into class G airspace without an ATS from the overland areas.

3. Consultation Strategy: Audience, Approach, Materials and Length

3.1 This is a proposal to redevelop EGD323, where much of segregated airspace has an anticipated base level of FL50. The airspace with a base level of FL50 is entirely over the sea but where there is a portion of airspace over the land, the base level is proposed to be FL150. This is an M2 airspace change being conducted in accordance with CAP1616.

3.2 On direction from DfT, the CAA will disregard the environmental impacts of military aircraft (including civil aircraft carrying out military function under contract) when carrying out its duties under section 70 when considering whether to agree to an airspace change proposal proposed by the military¹. However, this proposal introduces changes to the en-route structure where most traffic is civil registered. Therefore, NATS are undertaking an assessment of the potential impact to track miles flown for en-route traffic. An assessment can be derived from this regarding changes to fuel burn and CO2 emissions; however, due to the significant number of variables in how the airspace might be utilised (for example times of day, duration, variations in chosen configurations) the accuracy of the data is hard to predict.

3.3 Significant engagement has already taken place within the MOD community and with NATS (as the key stakeholder). Preliminary engagement has also taken place with airlines and specific airports, General Aviation, BGA, and briefings have been provided to a broader industry community through the FASIIG (with attendance from the FASVIG). Stage 3 consultation will be used to further develop this dialogue, where targeted stakeholders will be invited to participate by email and/or letter. It is anticipated that industry bodies will advertise the consultation through their own communication channels.

3.4 Stage 3 consultation will target specific additional aviation organisations, such as those operating in Class G airspace over the land (e.g. General Aviation, gliding etc.) and those who may operate more extensively over the sea (e.g. helicopter operations). Engagement through correspondence containing the proposal has already taken place with these stakeholders.

3.5 Whilst not excluded from participating in the consultation, the MOD does not intend to specifically target organisations whose primary interest is environmental (e.g. noise, local air quality). The environmental impact of potential changes to the en-route structure are all contained above FL245. A list of stakeholders can be found in Section 6 of this document.

3.6 The Stage 3 consultation will be conducted via Citizen Space an online consulting tool currently being used by the CAA, which will include a questionnaire and a document containing all relevant consultation material. Stakeholders will be alerted primarily via an initial email with an offer to brief directly if helpful, it is also anticipated that the CAA will provide notification via Skywise. We will also encourage MOD units in the locale to contact their airspace stakeholders with information of the consultation. This initial information cascade will be followed up with direct contact to those who have engaged previously to ensure they are in receipt of the documentation. Any requests for information in an accessible form will be considered on a case-by-case basis, along with requests to respond where access to Citizen Space cannot be achieved. Consultation material will outline why the change is required and what work has already been conducted so far. Information will be provided so that those without a technical understanding of aviation and/or airspace management can understand the issues, with technical detail being provided for those that wish to understand the proposal in more detail.

3.7 The consultation is expected to commence on 30 Jul 18 and will last 6 weeks, ending on 10 Sep 18. The MOD will monitor responses and in addition to the measures mentioned in para 3.6 will aim to encourage key stakeholders to respond via targeted emails at the 2 week point together with a general reminder to stakeholders at the 4-week point, lastly a final reminder nearer the closure date will be sent and again direct contact made if appropriate. The target AIRAC for commencement of the new airspace design is 03/2019 (effective on 28 Feb 19). It is essential that this date is met so that changes can be sequenced with NATS systems upgrades. Both this proposal and the NATS' system upgrades require additional training for controllers so need to be deconflicted. Not achieving this implementation date would mean that NATS could not implement mitigating routes until 2021 which would have a significant detrimental impact upon the civil network and/or Defence's ability to deliver Combat Air Training in support of the Government's Security Strategy. Neither are palatable outcomes for the UK. For this ACP, engagement and collaborative work has been taking place with NATS (the primary key stakeholder) for 18 months, and started prior to CAP1616 being issued. The

¹ [Department for Transport Air Navigation Directions 2017](#)

requirements and principles contained in CAP1616 have been applied against the work conducted so far, such that, although the process has been iterative over many months, design principles, options and engagement have been pursued in accordance with CAP1616 requirements. This engagement has meant that most potentially impacted stakeholders have had sight of the proposal since April 18 and the opportunity to engage and influence. Additionally, work conducted so far has indicated that, beyond NATS, key stakeholders are limited. The impact on airlines with the mitigation which includes Airspace Management will be minimised. Any potential impact on regional airports has already been considered and amendments made, but will be further explored during the consultation. DAATM is committed to conducting further stakeholder engagement prior to the start of the consultation through dialogue and have offered to visit targeted stakeholders where required. Therefore, given that the major Stakeholder (NATS) in this consultation is essentially a *de facto* partner in this ACP and that having been involved for the last 18 months they have already mitigated the impact upon their customers. That engagement and mitigation has already taken place for local commercial airports. That regional airlines have been engaged throughout and that with a base level of FL150 over land any impact on other airspace users is negligible, but where identified, such as gliding, has been accounted for. This together with the operational and technical issues beyond the MOD's control supports the MODs considered opinion that a 6-week consultation period is reasonable and proportionate for this ACP.

3.8 Consultation responses will be moderated and published on Citizen Space by the CAA in batches as stated in CAP1616; the MOD will provide feedback or clarification to responses through Citizen Space prior to closure of the consultation where it is deemed advantageous to the consultation process. If consultation responses contain sensitive data, the MOD would expect the CAA to redact that response. The MOD will acknowledge receipt of responses submitted through the Citizen Space and will include clarification where required. In the event of issues with the consultation material, the MOD will communicate directly with stakeholders to resolve any issues. Consultation responses will be reviewed throughout the consultation; a review will be undertaken after 3 weeks to determine if the number of responses is as expected, and if the material requires amendment to improve the consultation process. Amendments to the consultation material will be communicated to stakeholders.

3.9 At the end of the consultation responses will be analysed and themed; any late responses may not be included in the subsequent analysis. The consultation response document will summarise the themes and responses to issues raised, and identify if these will influence the proposal. The feedback document will be available for download via Citizen Space, and the formal submission of the ACP will consider those factors specified in the feedback report determined as having an influence on the design.

4. Reversion Statement

4.1 The MOD considers that the proposal in this consultation is essential to meeting government-directed requirements; the 'do nothing' option is not a feasible solution. There would be a serious impact to MOD capability should the proposal not be implemented or if access to the segregated airspace could not be permitted.

4.2 Should the proposal be approved and implemented, it would be difficult and undesirable to revert to the pre-implementation state. Therefore, any safety or operational concerns regarding the larger EGD323 could be managed through activation protocols and airspace management procedures. Additionally, as is the case now, the proposal states that the segregated airspace is sub-divided such that undesirable situations can be mitigated through Level 1 and 2 airspace management activities.

5. Conclusion and Next Steps

5.1 The MOD proposal for developing suitable airspace for Combat Air training activities in the UK has been developed through 18 months of engagement with the users of the airspace, NATS (as the key stakeholder) and broader MOD. Recent engagement has introduced additional dialogue

between airlines, airports and the General Aviation community. Whilst there is a single option to be presented to a wider community through consultation, responses will be considered where they impact on the design such that modifications may be made prior to submitting the formal proposal to the CAA.

5.2 It is important to note that, whilst the ACP is focussed on expanding EGD323 and introducing new routes, the MOD is also undertaking parallel activity to improve Level 2 and Level 3 airspace management to maximise efficiency in the use of segregated airspace, as well as provide improved reporting of actual airspace use.

5.3 Given the extensive engagement activities that have taken place with NATS, both before and after the introduction of CAP1616, and the likely minimal impact on other airspace users and those on the ground, the scaling of the consultation period is reasonable and proportionate.

5.4 On completion of the consultation period the MOD will produce a consultation report. It is anticipated that the MOD will submit the formal proposal to the CAA as soon as practicable after the completion of this report. This allows the project to continue progress towards an introduction in early 2019, which is slightly earlier than originally envisaged to deconflict from other major projects which require the same resources to implement and to support Government directed Force Generation.

6. List of Stakeholders

CAA

FASIIG

Military Airspace Users Working Group

NATS

Aerlingus

Air France

Air NZ

American Airlines

British Airways

Cathay Pacific

City Jet

Delta

DFS

Eastern Airways

Easy Jet

Emirates

Etihad

Eurowings

Fedex

Finnair

Fly Dubai

flybe

Gama Aviation

Heathrow Airlines Operations Committee

IAG

Iceland Air

Jet2

KLM

Logan Air

Malaysia Airlines

Norwegian

Qantas

Qatar Airways

Ryan Air
SAS
Singapore Airways
Thomas Cook
TUI
United
UPS
Virgin Atlantic
West Jet
Wizz Air

BGA
Durham Tees Valley Airport
FASVIG
GA Alliance (for BBAC, BGA, BHPA, BMAA, BPA, HCGB, LAA, PPL/IR Europe, RAeC)
Humberside Airport
Newcastle International Airport
Norwich Airport
NATMAC
Bond Helicopters
Bristow
CHC
NHV
Northern Regional Airspace User Working Group