

Ministry of Defence

Modernising Airspace

Consultation Document

Development of North Sea Airspace for Military Training

Stage 3 Consult

Step 3D Collate and Review Responses

Publication History

Version	Month / Year	Change Requests in this Issue
Issue 1.0	Sep 18	Submitted to the CAA for publication

References

	Description	Hyperlinks
1	Stage 1a Assessment Meeting Presentation	LINK
2	Stage 1a Assessment Meeting Minutes	LINK
3	Stage 1b Design Principles	LINK
4	Stage 2a Airspace Change Design Options	LINK
5	Stage 2a Design Principle Evaluation	LINK
6	Stage 2b Options Appraisal (Phase 1 – Initial)	LINK
7	Stage 3 Consultation Strategy	LINK
8	Stage 3 Consultation Document	LINK

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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.

1.2 This document aims to provide adequate evidence to satisfy Stage 3, Step 3D Categorisation of responses

2. Consultation

2.1 The MOD has completed a seven-week consultation on a proposed airspace change to the current D323 complex in the North Sea. This would expand the current volume of segregated airspace and partially re-align some ATS routes in and around the area.

2.2 The timeline for this proposed airspace change is fixed by NATS resource availability and AIRAC availability on the 28 February 2018 (AIRAC 03/2019).

2.3 The consultation strategy document (Ref 7) describes the focus of the consultation including previous engagement activities completed, the audience of the consultation and justification behind the consultation strategy.

2.4 A consultation document (Ref 8) has been written for the proposed airspace change and provided to stakeholders. This includes a description of the current airspace, the proposed changes and impacts of the proposal.

2.5 A total of 39 airlines, NATS, BGA, GA, several airports and a range of other agencies were engaged and targeted for this consultation. These are listed in Annex A – List of Stakeholders. A description of engagement activities can be found in the Consultation Strategy Document (Ref 7).

2.6 All Stakeholders were sent an email notification email to inform them when the consultation was live. A follow-up email was sent out to all the targeted Stakeholders Monday 13 August 2018 and Tuesday 28 August informing them of the consultation and prompting them to respond. A final email was sent out on Wednesday 05 September 18 informing all personnel of the extension to the consultation period.

2.7 The consultation has been conducted via an online portal which included an overview into the proposed changes, the consultation document available for download and a survey which allowed users to submit feedback through.

2.8 A list of the questions used in the online portal can be found in Annex B – Online Portal Questions.

2.9 The consultation commenced on Monday 30 July 2018 and initially ended on Monday 10 September 2018; a period of six weeks. Following a request from one of the airlines, the period was extended to the end of the day on Friday 14 September 2018.

2.10 Responses have been managed and uploaded to the portal by the CAA.

3. Summary of Consultation Responses

3.1 A total of 18 responses were received in the seven-week consultation period.

3.2 At the end of the seven-week deadline, the responses have been analysed and themed.

3.3 Responses were received from all four of the primary stakeholders: BGA, Durham Tees Valley, Newcastle International and Humberside Airports. A detailed response was also received from NATS, a mandatory stakeholder, who have worked alongside the MOD on this proposal.

3.4 Nine out of the eighteen responses fully supported the proposed changes (50%) and six were neutral (33%). Three opposed the suggested changes (17%). These have been summarised below in Table 1 below, alongside the organisation behind each response.

Response ID	Organisation	Support of Airspace Change
1	Wilda Gliding Club	Support
2	Humberside Airport	Support
3	Durham Tees Valley Airport	Neutral
4	Bagby Airfield	Support
5	North East Civil Air Patrol	Support
6	United Airlines	Neutral
7	UK Flight Safety Committee (NATMAC Member)	Strongly Support
8	BGA	Support
9	Light Aircraft Association	Support
10	Individual	Neutral
11	NATS	Neutral
12	The Honourable Company of Air Pilots	Support
13	Cobham Aviation Services	Support
14	KLM Royal Dutch Airlines / Delta Airlines	Oppose
15	Jet2	Oppose
16	Newcastle International Airport	Strongly Oppose
17	Norwich Airport	Neutral
18	Virgin Atlantic	Neutral

Table 1: Responses Overview

3.5 The online portal included focussed questions on whether the respondent supported specific elements of the proposed changes. Figure 1 below shows the four questions posed by the MOD in which specific support was requested.

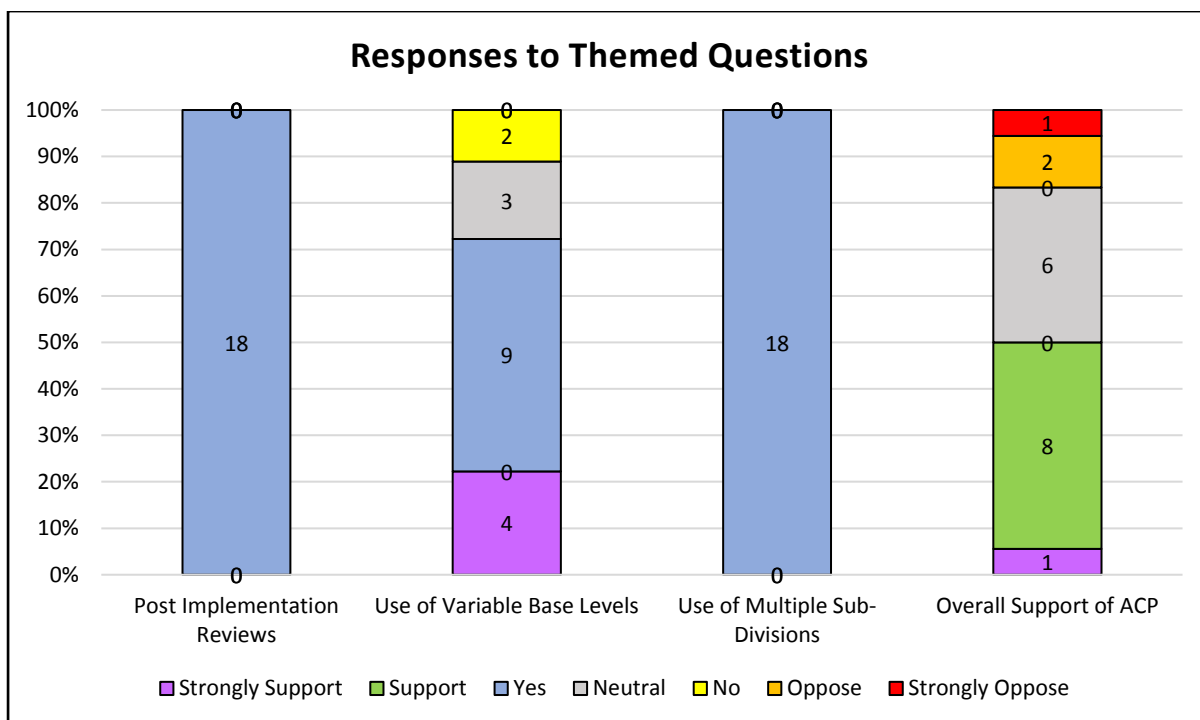


Figure 1: Consultation responses to themed questions

3.6 As seen above, most respondents showed support for the specific elements of the proposal with 81% of all responses either supporting or agreeing with the suggestions. There was a total of seven neutral responses received (13%) overall and two which objected solely to the variable base levels. These observations are covered in more detail in Section 4 below.

4. Categorisation of Consultation Responses and Themes

4.1 The 18 responses received have been reviewed and categorised; some comments were made up of several different elements. The responses have all been themed based on the focussed questions covering the use of Post Implementation Reviews, Variable Base Levels, Multiple Sub-Divisions and finally the overall support to the ACP. The comments below have been analysed with consideration by the MOD detailed below.

4.2 Two responses objected to the use of variable base levels, one commenting that it would add unnecessary complexity. To adhere to good FUA principles, the MOD encourage airspace users to only book what airspace is required, including the maximum top height they would operate to. For base levels, those in the design will initially be used for all bookings, however iaw FUA principles as airspace management matures, variable base levels may be used if they provide additional airspace efficiency without introducing unnecessary complexity.

4.3 The remaining responses detailed the support for Post-Implementation Reviews and responses to the overall support or opposition with regards to the whole ACP.

4.4 Responses which may impact the Final Proposal

There were only four responses which have been categorised as having the potential to impact on the proposed design option. These are detailed below:

Response ID	Comment	Themes	Impact to the Final Proposal	MOD Response / Actions
1	Airspace areas are already over complicated with lateral boundaries. Vertical boundaries add to this. Variable vertical boundaries would give much scope for errors.	Variable Base Levels	Varying the base level of the overland portion was considered to maximise FUA. The base level of the overland portion has been raised to FL150. These areas are activated by NOTAM so the base level can be variable although the norm will be to activate to FL150.	The current design still proposes three differing base levels; FL150 over land; FL50 over the main body of the DA (wholly over the sea) and FL100 in the far-easterly portions. The normal configuration will be for areas to be booked with these base levels, this is deemed as the least complex mode to operate in. However, iaw FUA principles the base levels remain available to be book at variable levels should that be deemed to be most efficient.
2	As part of the Implementation review, there needs to be regular checks and balances to ensure effective booking and usage, with airspace handed back where there is a delay or it is no longer needed. Airspace Management will never be perfect owing to the UK's variable weather, aircraft serviceability and aircrew availability, but a mandated control frequency for all bookings would greatly improve the situation.	Post Implementation Reviews	The MOD has suggested Post-Implementation Reviews at three-monthly intervals to ensure both that the airspace is being managed appropriately and used as efficiently as possible.	It is an ambition for the MOD to implement a permanent Level 3 Management Cell at RAF(U) Swanwick at the same time as this airspace introduction; this would ensure that the airspace is managed as effectively as possible.
6	Having alternate routes available when the DA is active is to have robust airspace management arrangements that will allow civil to have precedence on busy north-about NAT days, and wherever possible to suppress military activity to the lowest usable level to enable civil traffic to transit above. It will be important to get accurate use statistics so that when the review takes place, changes can be made if the military aren't making efficient use of the airspace.	Post Implementation Reviews	The MOD have negotiated with NATS to ensure the airspace is shared appropriately between both users. Specific protocols and tipping points will be detailed in the ACP Final Submission.	The MOD will liaise with NATS Customer Affairs to ensure these management protocols are publicised to all relevant users. It is intended to gather data on airspace use through normal processes and potentially through a Centralised L3M Cell.

13	<p>Although the overland areas (F-J) do not encroach on DTVA's controlled airspace, they will have an impact on Cobham's Falcon 20 transits, both outbound and on recovery as the proposed base is FL150. Outbound, we will have to restrict climb to <FL150 if the areas are active. This will have a corresponding consequence on fuel burn and thus time on task with Typhoons. The other aspect of this is that our transits and take-off times are often dictated by our ability to get to height so they may well be extended if we have a situation where we are denied the ability to climb. The solution to this could be to climb to the west of the proposed airspace but this would force us to climb through congested airspace in the Vale of York, something we like to avoid. Recovery to base will also be slightly more problematic, especially from areas F and G. If we are required to exit the area in a hurry at the end of our allotted range slot we could find ourselves with a lot of altitude to lose in a limited number of track miles.</p>	<p>Increase risk of Loss of Separation against Military transiting to segregated airspace, and also leaving and entering</p>	<p>The MOD have agreed that Military aircraft transiting to and from the overland portions of the new airspace (F-K) will be in receipt of an ATS, these transits should not be conducted autonomously.</p>	<p>The MOD understands the concerns with regards to the reduced airspace available to transiting aircraft, including the impacted heights and transit times. The MOD will work with Cobham to ascertain feedback at appropriate intervals following implementation in order to understand the severity of the impact. If these concerns are still an issue, the MOD will consider further mitigations.</p>
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4.5 Responses which do not impact the Final Proposal

The following responses have been captured as not containing any new information or suggestions that could lead to a change in the final design. The MOD have made sure that any additional relevant feedback is captured, including any actions or considerations arising from it.

Response ID	Comment	Themes	Impact to the Final Proposal	MOD Response / Actions
3	<p>Direct co-ordination with ATC at DTVA should be executed when area's F, G, H, and J are activated and de-activated.</p>	<p>Increase risk of Loss of Separation against Military against leaving segregated airspace</p>	<p>Nil.</p>	<p>The MOD have agreed that Military aircraft leaving the overland portion of the new airspace (F-K) will be in receipt of an ATS.</p>
4	<p>Helpline number to advise as to current status so that GA pilots can quickly check as to activity</p>	<p>Awareness of DA activity</p>	<p>Nil.</p>	<p>Pilots can check NOTAM publications or liaise with the MABCC (details contained within or via Swanwick(Mil)) if they have questions as to DA activity.</p>

5	The Civil Air Patrol in the North East of England has no concerns with regard to the proposed extension of airspace for military training which, together with the built-in safeguards, should have little, if any, impact on commercial and private air traffic operations.	Overall Support of ACP	Nil.	Nil.
7	The UKFSC supports this ACP. The need for training airspace is essential for meeting national defence requirements and this proposal offers a flexible, proportionate and appropriate solution that appears to balance the needs of all sections of the aviation community. Whilst it is based on FAS principles, I note that the approach is consistent with the broad themes of the 'Modernising Airspace' strategy being developed by the CAA - this should be made explicit in the final proposal.	Overall Support of ACP	Nil.	The MOD has worked hard to liaise with NATS and the CAA to ensure they are adhering to the Airspace Modernisation Strategy. Working closely with the FSP Steering Group, it has been articulated that this change is merely a stepping stone to potential future MOD requirements and further large scale changes may be required over the next 3 - 10 years.
8	From our perspective, we now see the proposal as being safe, proportionate and one that takes other user's requirements properly into consideration. We therefore support the proposal.	Overall Support of ACP	Nil.	Nil.
9	The proposal document, particularly in its earlier iteration, used graphics which were hard to interpret against the local topography. We would be most grateful if any future consultations would present the airspace proposals superimposed on conventional CAA 1:500,000 or 1:250,000 charts as used by the civilian flying community.	Ability to understand the detail of the proposal	Nil.	In the future, the MOD will consider the use of a wider range of charts when detailing the change and promulgating to airspace users.
10	I fly a paramotor up to 5000 feet along the Redcar to Whitby coastline. Paragliders can often be found on this route as well. We fly over the sea and the land. The new proposal does not impact upon us as you have stated 5000-foot minimum for your change over sea. The proposal does however, bring us closer together.	Potential increase in risk of Loss of Separation between Military aircraft and GA	Nil.	Nil.
11	CAP740 (issue 6, May 2017) sets out the regulatory framework and governance of UK airspace management, and the application of FUA. NATS asks the MoD to jointly support a formal request to the CAA to change CAP740, aligning with the spirit of the MoD's Section 6 of their consultation document.	Airspace Policy	CAP740 changes are not deemed to be relevant as part of this ACP.	This feedback will be passed to the CAA for review and comment.

<p>11</p>	<p>NATS has undertaken development simulations to determine the viability of the airspace design and the resultant impact to its operation. Such simulations have identified that whilst the majority of changes required can be acceptably accommodated (given agreements reached in respect of danger area level activations) the impact to one sector in particular (Montrose South) remains high. Additional complexity and thus workload is created with the handling of ScTMA inbound and outbound traffic along with the requirement to affect verbal co-ordination for transiting Military traffic. These issues are introduced by the reduction in available airspace as a result of the revised overland portions of D323 and the routing of traffic via N110 turning at AGPED.</p> <p>Mitigations to reduce the operational and customer impact of this additional workload require additional staffing resource to be allocated to Montrose South to provide Tactical and Planner staffing levels when activation of the overland portions of D323 is implemented. The ability to guarantee such resource for this sector is not assured as the staffing plans for RP2 did not include the impact of this change. Where combined Tactical and Planner Operations (single staffing) only is available reducing traffic levels remains the only other compensatory measure that can be introduced to reduce complexity and workload. Initial modelling indicates reduction in traffic levels has the potential to introduce delay of up to 2500min per day (additional evidence available on request).</p>	<p>Controller Capacity</p>	<p>Nil.</p>	<p>The MOD have worked with NATS to provide Military controllers to all simulations in order to provide as realistic scenarios as possible.</p> <p>The MOD worked with NATS in the design of the new CDRs to ensure they were feasible from a NATS Operation perspective.</p> <p>The MOD understands the potential increase in workload and complexity in Montrose South. To try and mitigate this the MOD have agreed to the implementation of a Reduced Coordination Area to allow more freedom to controllers and the ability to route aircraft away from published routes.</p>
<p>11</p>	<p>NATS recognises the commitment made by the MOD to improve its 3rd line airspace management procedures through trials currently being undertaken at Swanwick. NATS would welcome the nomination of a Senior Responsible Officer of Air Rank, who would be accountable for the delivery of agreed utilisation targets in line with the advocated 3 monthly reviews.</p>	<p>Adequate L3M</p>	<p>Nil.</p>	<p>One of the recommendations following the L3M Trial at RAF(U) Swanwick is to implement a permanent Cell alongside the airspace change. It has been suggested that an appropriate individual will be nominated as being responsible for efficient airspace management throughout that flying day. This is still for consideration and will be determined by the MOD Chain of Command.</p>

12	The Honourable Company of Air Pilots recognises that military assets need sufficient space to train, which MOD states as the reason for this request for increased segregated airspace and a larger EGD323. We are encouraged by MOD intention to adopt Flexible Use of Airspace to maximise airspace availability for other users when possible and to review the airspace management protocols and agreements every 3 months. However, paragraph 9.2 states, "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."	Reversion Policy	Nil.	On liaison with NATS, it has been agreed that reverting back to previous designs would be too cumbersome and expensive for the civil route structures.. With regards to the segregated airspace, if it was determined that the airspace design was not working, the MOD would cease to book the segregated airspace, pending review and redesign.
12	Providing MOD accepts it must keep all its segregated airspace under review for potential reduction when operational factors permit, The Honourable Company of Air Pilots is content with this proposal.	Overall Support of ACP	Nil.	The airspace will be reviewed on a 3-month period for the first year and will remain subject to periodic review.
14	For Outbound EHAM traffic, these routes could be optimized to be closer to the edge of the expanded airspace: Proposed: GIGUL KULOZ (544449N0030559E) ANARU (554036N0020559E) GOMOT 165.1nm Improved proposal: GIGUL RODSI 554157N0015408E GOMOT 162.8NM Delivering 2,3nm improvement to the proposed N44/N66 route.	Route Design	Nil.	The MOD consulted heavily with NATS as to the design and adjustments of the routes. Given the current CAA Buffer Policy requirements, the routes proposed were deemed the most safe and efficient way of routing around the newly created airspace.
14	The proposed non-bookable window does not support the main westbound flow from EHAM.	Airspace Sharing Protocols	Nil.	The MOD have liaised with NATS to consider the network as a whole. Further clarity as to the suppression window will be detailed in the Final Submission.
14	The N110 does support the DOLAS traffic without high impact. NALAX flights however will be impacted highly. CDR dependency of optimal routing should be avoided to minimize dis-benefit for flights in/out Scottish TMA and take benefit of improved routing to TLA. An alternative should be considered to avoid this. For example, by: 1. Adding a LIBSO-ERKIT connection which stays clear of D323 2. Vertical segregation limit to Area F (and J) and non-bookable or civil preferential between 0900-1200 and/or if area KLMNPQ are active to minimize impact on transatlantic traffic.	Route Design	Ni.	The MOD have liaised with NATS to address the suggestions below: 1. A permanent LIBSO-ERKIT connection cannot be catered for as it does not adhere to the CAA Buffer Policy. 2. The MOD have established sharing processes in areas K-Q but given the high importance of the overland portions; these protocols are considered inappropriate for these areas. New routes have been added to

				maintain flow. For demanding military training to meet the 120nm x 60nm requirement all areas will be required. However, for less demanding airspace requirements the MOD remains committed to booking airspace that minimises impact on the network.
15	Whilst we do not have the insight that the MOD has, we understand that the UK is significantly short of armed forces personnel, and although there is a commitment to purchase more aircraft for the RAF, will these aircraft actually be delivered? If they are not, does this alleviate the airspace requirements and can airspace be handed back on a permanent basis?	Airspace Requirements	Nil.	The MOD are currently planning for the introduction of the F35; 9 in 2018, 49 by 2022 and 75 by 2024. The Typhoon fleet is also planned to increase from 90 to 108 aircraft by 2021. If the MOD's stance changes, the airspace will be adjusted accordingly.
15	The MOD has other UK danger areas already established, with overland portions where land based assets can be engaged. So why does it have to have this particular area? For example, the Tain range in the NE of Scotland has a very short transit time from RAF Lossiemouth, which is already a Typhoon base, and the F35 could also operate from here. Air combat training could be carried out in the current EGD 323 area and the engagement of ground assets achieved on other ranges such as Tain or Holbeach, which we note is also going through a current ACP.	Overland Portion of new Airspace Design	Nil.	The Design Principles of the DA state that the minimum requirement for segregated airspace is a 120nm by 60nm box including a portion overland; neither Tain nor Holbeach caters for these requirements. The basing of F35 at Marham and Lakenheath had been agreed at Government level prior to the commencement of this ACP and is driven by many other factors.
15	We would however, suggest that more training could be done in simulators rather than requiring the large areas of airspace being proposed in this ACP to be unavailable to other airspace users.	Use of Segregated Airspace	Nil.	The MOD conducts a significant amount of flying training synthetically already; there must be an element of live training to ensure aircrew are fully prepared for the combat environment.
15	The current management of EGD 323 complex is run by the UK MABCC and activity is notified D-1. This is critical for airlines, both long haul operators and for the short haul carriers, especially those operating to and from Newcastle or the Scottish TMA airfields. This is a "must have" under the development of the FUA concept of operations, as if this new area is to work at all, activity must be planned D-1 and then be executed in accordance with the plan. This will change when the capabilities of being able to switch the airspace on and off through electronic	Airspace Management	Nil.	All MDA activity is booked by 1700 D-1. No new MOD activity in the D323 complex is booked at D-0. It is the intention of the MOD to execute their flying programme as planned but due to aircraft serviceability and weather, this is not always the case. To adhere to good FUA principles, the MOD

	means are realised as alluded to above. This will then allow for adjustment and development of the airspace management protocols, which will allow the airspace to be managed on a more tactical basis.			work hard to hand back airspace with as much notice as possible, allowing airlines the opportunity to re-file.
16	In summary, Newcastle International Airport cannot support the proposed airspace change in its current format. At the macro level we do not believe the MODs strategy is necessarily aligned and equitable with overall government. At the more local level the proposal, and our confidence in the MoD's ability to effectively manage the airspace, leads us to believe that the potential route loss, potential reduction in our regional growth, alongside environmental and economic impacts needs further analysis.	Overall Support of ACP	Nil.	The MOD having met with Newcastle are surprised by the response. We do not agree that our strategy is incoherent with other Govt policy. The MOD have instigated L3 Airspace Management Trials over the summer months to make the necessary improvements to airspace efficiencies. It is a recommendation of these trials for a permanent L3M Cell be established at RAF(U) Swanwick to continue to develop these processes. Alongside this, the MOD have liaised with NATS to establish sharing protocols for the new airspace. These will be detailed further in the Final Submission document. The proposal does not impact any published routes from Newcastle. The ability to make use of ad-hoc short cuts subject to controller availability has been retained.
16	The MoD basing decision for these aircraft being taken prior to stakeholder engagement on airspace does seem a little disjointed and seems to give the country a fait accompli rather than transparent dialogue.	Position of Segregated Airspace	Nil.	The basing of F35 at Marham and Lakenheath had been agreed at Government level prior to the commencement of this ACP.
16	When active the proposed airspace will see some aircraft operating from Newcastle International Airport having to operate with a reduced payload and all aircraft having to route significant additional track miles to current practise; in some cases this could make routes unviable and with it damage the regional economy.	Potential increase in track miles	Nil.	This ACP does not impinge on any published approach and departure procedures from Newcastle. The ability for aircraft to make use of tactical short-cuts using irreducible spare ATC capacity has been maintained.

16	Potential options to mitigate the proposed airspace include either modifying the airspace and accommodate our proposal within the RP3 consultation for an airway between ourselves and Ottringham or for the MoD to fund a runway extension at Newcastle International Airport to ensure routes and aircraft payloads are protected.	Suggested mitigations	Nil.	It is not the function of the ACP to fund runway extensions at Newcastle Airport. The current ability for aircraft to make use of irreducible ATM capacity to transit off the civil route structure has been maintained and the LOA amended to support this. If another Airspace change were suggested in this area the MOD would engage through the CAP 1616 process.
17	Thus, I request that any proposed change to the dimensions of D323 that affect the positioning of L602 also takes account of any proposed change to the dimensions of D207 and vice versa.	Other impacting ACPs	Nil.	The MOD acknowledge this point. The MOD will liaise with the D207 Airspace Sponsor and ensure they are cognisant of the changes in the D323 complex and the potential impact on airspace users.
18	Whilst we remain neutral on this proposal, we support the overall approach to balance the needs of different airspace users that has been laid out in the consultation document.	Overall Support of ACP	Nil.	The MOD have worked hard with NATS to ensure the expanded airspace is booked appropriately by the MOD to cater for particular training requirements, as well as allowing for peak traffic loading on north-about days for Civil.
18	The nature of our operation is such that we do not anticipate any of our normal scheduled flights will be directly interact with this airspace volume. However, there would be an overall network impact when all or some of these areas are active, due to the redistribution of traffic around the active areas. As such, we would expect robust ASM techniques to be used and mitigation put in place to minimise any impact to users caused by "knock on" delays. This is of particular importance to us with regard to airspace sectors that may be effected by a combination of the area activation and positioning of the North Atlantic Tracks on a given day.	Airspace Management	Nil.	The new airspace has been designed to allow for all elements to be active simultaneously to cater for particular training sorties. When the elements of the airspace are not required, they will not be booked. Robust protocols have also been written in order to minimise disruption to the North Atlantic Traffic flows.

4.6 Comments stating concerns as to the increased risk of Loss of Separation from Military aircraft leaving or entering the new segregated airspace have been taken into consideration and mitigations including the mandating of Military aircraft receiving an ATS have been suggested by the MOD. The increase concern regarding the reduction in Class G around NATEB and in the Vale of York has been noted and the MOD will work with airports to ensure the safe transiting of aircraft is always maintained as a priority.

4.7 Responses stating concerns as to appropriate sharing protocols of airspace, ensuring maximum efficiencies for both Military and Civil users have been taken on board. Following continued detailed liaison between NATS and the MOD, robust protocols will be developed to ensure the most appropriate windows are established; further details of these will be detailed in the CAP1616 Final Submission document.

4.8 One of the respondents commented on the lack of Derogated Services in the Vale of York catering for tactical short cuts by airline. This service is provided out of MOD's spare capacity and airlines are continuously informed to plan to take the long way around; if Swanwick(Mil) has the capacity to offer the short cut, they will do so. The reduction in spare capacity at Swanwick(Mil) due to the shortage of RAF controller is deemed to be outside of the scope of this ACP.

5. Conclusion and Next Steps

5.1 The MOD have considered all the comments and feedback and have chosen to not update the final design. The Airspace Management Protocols can always be adjusted and are available for further discussion. Great deliberation and attention was taken in the definition of the segregated airspace boundaries to adhere to the Design Principles stated in Stage 1 (Ref 3) of this ACP. Work has been conducted with NATS in the development and redesign of current routes to provide efficient options for transiting around the active airspace; resulting in multiple other changes by the MOD. The MOD believe adapting the current design would result in a failure to adhere to the Design Principles and an intolerable delay to the introduction of required segregated airspace for Military aircraft.

5.2 This document will be published onto the MOD Combat Air ACP on the CAA web page alongside the documents referenced on Page 2. The next step will be to publish the formal Airspace Change Proposal and submit this to the CAA. This will also contain information on how the consultation feedback informed (if relevant) the evolution of the final proposed design.

6. Reversion Statement

6.1 Should the proposal be approved and implemented, it would be extremely difficult to revert to the pre-implementation state. This is due to the large requirements for NATS controller training at a time where multiple changes are already taking place. A reversion of this design would be very expensive and cumbersome to NATS. Should issue arise with the segregated airspace, the MOD would consider not booking elements until a resolution has been found.

6.2 Given the time sensitive implementation dedicated by NATS and the lack of opportunity to delay the change, the impact on MOD training and force generation without the successful implementation of the change will be severe. The current airspace does not support MOD requirements for 5th Gen aircraft. Without an expansion of segregated airspace, fast jet activity will not have the ability to train efficiently creating a potential risk to UK Defence. If the change was not implemented at the stated timescales, there would be a very substantial delay in order to negotiate an appropriate window for NATS.

7. Annex A – List of Stakeholders

Links to the consultation are on the CAA Website. The consultation is most relevant to the stakeholders listed below, but is not exclusive to this list.

Mandatory Stakeholder:

NATS

Primary Target Stakeholders:

These following operators and organisations were engaged during the consultation and their response actively sought:

British Gliding Association

Durham Tees Valley Airport

Humberside Airport

Newcastle International Airport

Other Target Stakeholders:

CAA

FASIIG

FASVIG

Military Airspace Users Working Group

NATS

NATMAC

GA Alliance (for BBAC, BGA, BHPA, BMAA, BPA, HCGB, LAA, PPL/IR Europe, RAeC)

Norwich Airport

Leeds East Airport

Airlines UK

BAE Systems

Department for Transport

Bond Helicopters

Bristow

CHC

NHV

Airlines:

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

8. Annex B – Online Portal Questions

The following questions were included in the online portal for users to complete. Imposed answers have also been shown below, alongside whether the question was mandatory or not.

1. What is your name? (*Mandatory*)
2. What is your email address? (*Mandatory*)
3. Are you responding as an individual or do you represent an organisation? (*Mandatory*)
4. All responses will be published. Are you happy for your name to be included in the response publication? (*Mandatory*)
5. Please provide your feedback on the proposal. (*Optional*)
6. If you would like to send us a response document or related evidence, please do so. (*Optional*)
7. As the segregated airspace is actively managed, the management protocols are key to ensuring optimum use for the UK. To ensure this is working correctly it is proposed to implement reviews at 3 monthly intervals. Do you support this? (*Optional*)
 - a. Yes
 - b. No
8. If interim Post implementation reviews take place, who should be involved? (*Optional*)
9. Do you support the use of variable base levels for segregated airspace? (*Optional*)
 - a. Strongly Support
 - b. Yes
 - c. Neutral
 - d. No
 - e. Strongly Oppose
10. If not supportive of flexible base levels for segregated airspace, why not? What would you propose the base level of the overland portion should be? (*Optional*)
11. The MOD are committed to using Flexible Use of Airspace principles to manage segregated airspace. This requires that segregated airspace is sub-divided such that only that airspace that is required is used. Do you support this approach? (*Optional*)
 - a. Yes
 - b. No
12. Are there any areas of the design where you feel further sub-divisions would potentially benefit other airspace users? (*Optional*)
13. Activation of some areas will be subject to agreement with NATS to ensure civil flow at peak times. Are there other areas of the design where the MOD should be making agreements regarding scheduling? If so where and with whom? (*Optional*)

14. Whilst ensuring that essential Government directed military capability is generated and maintained, the MOD are keen to reduce impact on other airspace users. Are there any other potential mitigations or design amendments that could be used to achieve this?

(Optional)

15. Do you or your organisation support or oppose this proposal? *(Optional)*

a. Strongly Support

b. Support

c. Neutral

d. Oppose

e. Strongly Oppose

16. If you oppose this proposal, why? Can you suggest any mitigation or alterations that would resolve your opposition? *(Optional)*