



INITIAL STAKEHOLDER CONSULTATION FEEDBACK

Ministry of Defence Airspace Change Proposal for Hebrides Range

Consultation material relating to proposed airspace changes

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Record of changes

Issue	Date	Detail of Changes
1	28 th February 2014	Initial Issue

Note

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1 Aim

- 1.1 The aim of this document is to provide stakeholders and other interested parties with feedback on the consultation conducted by QinetiQ regarding the proposed changes to the Hebrides Range Danger Areas (DA) EG D701 complex.

2 Public Consultation Process

- 2.1 The consultation period for the Ministry of Defence (MoD) sponsored Airspace Change Proposal (ACP) for Hebrides Range ran over a 12 week period from 24th September 2013 to 20th December 2013. A copy of the original consultation document¹ is available at www.qinetiq.com/hebsacp.
- 2.2 Sixty three (63) organisations were identified as key stakeholders and each was formally notified by either letter, email or both, at the start of the consultation process. Reminders were sent four weeks prior to the end of consultation to those addressees who had not responded. The consultation was also advertised in the local press, providing the web address to enable readers to access the consultation document.

3 Consultation Feedback

- 3.1 The consultation process did not reveal any objections or adverse comment pertaining to the design coordinates of the DA Complex other than one minor alteration. It was suggested that EG D701X could be reduced in size and internal boundaries of other areas adjusted such that there was a decrease in the number of DAs in the North Atlantic Transition Area (NOTA). It was thought that this change could potentially free up an additional Oceanic Entry Point (OEP) for Shannon. However, upon investigation it was considered unlikely this change would have any positive impact due to safety trace characteristics (ballooning effect from source) and as such, it was agreed the areas would remain as designed but would be subject to review after 12 months of operation.
- 3.2 A minor concern was raised with regard to the number of individual areas and the use of letter designators I and O, as these could be confused for number one and zero. Various options were considered by the Focus Group² including the combination of areas to reduce the overall number. However, this would have been counter to the Flexible Use of Airspace (FUA) concept as extra airspace would be used unnecessarily. Other options included the splitting of the EG D701 complex into 2 distinct DAs, then renumbering and lettering them accordingly. On the balance of risk, it was considered the least risk was carried by utilising letters I and O as opposed to renumbering 'well known' areas, especially as I and O would never be activated in isolation and therefore notified concurrent with adjacent areas.

¹ "Consultation for the Ministry of Defence Airspace Change Proposal for the Hebrides Range QINETIQ/13/02112 dated 24th September 2013.

² Key stakeholder group formed to support the ACP development and process.

4 Responses to Consultation

4.1 Response statistics

4.1.1 Consultation documents were sent to 63 primary stakeholders.

4.1.2 Of the 63 identified primary stakeholders, 34 (54%) did not respond, 23 (36%) responded with no objection and accepted the proposal, 4 (7%) responded but stated they had no view and 2 (3%) objected to the proposal.

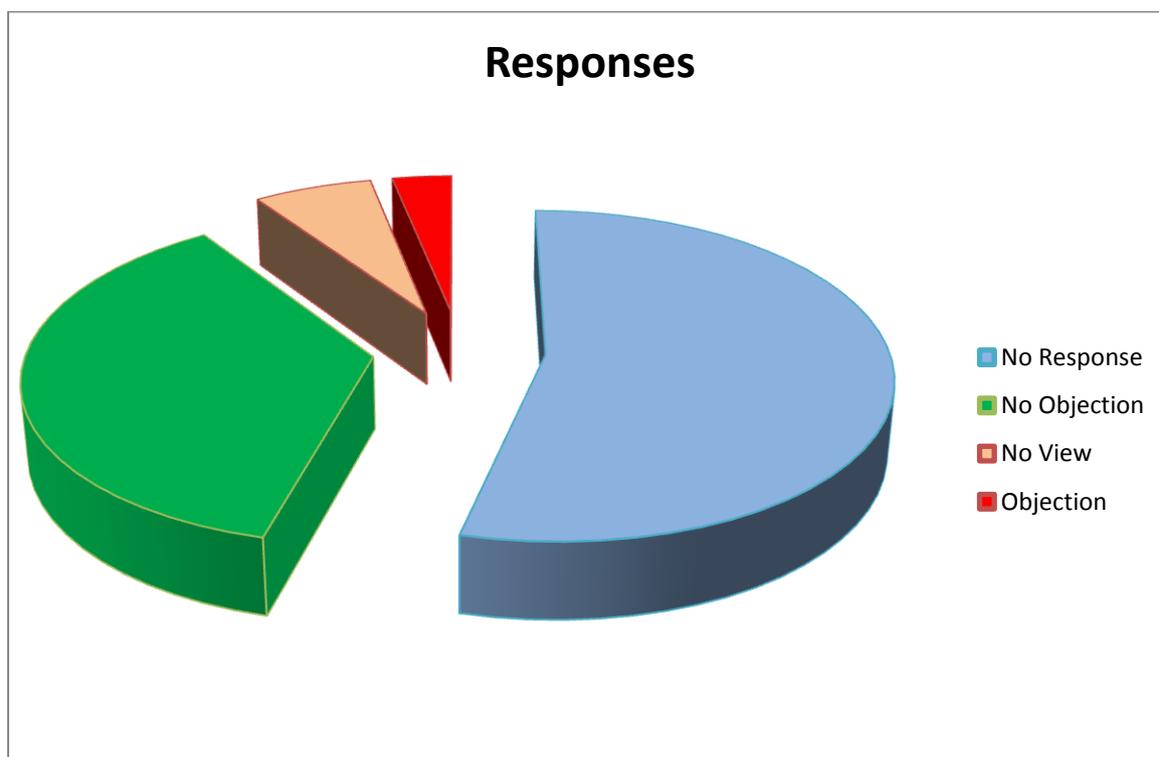


Figure 1: Responses from identified Stakeholders

5 Objections to the Proposal

- 5.1 The two objections³ to the proposal received were similar in content and focused primarily on access to the DAs. One raised concern that the current difficulties they experienced gaining access would be exacerbated by any expansion of the airspace designated as DAs. Upon investigation it transpired that there were processes and procedures in place to accommodate this particular stakeholder's activity. However, it was recognised the procedures should be formalised and updated as required to reflect the new DA design. In addition, improvements could be made in the publicity of Range contact details. Both these areas are now being addressed and resolution will be in place well in advance of implementation of the revised DAs.
- 5.2 The other objection raised similar concerns. However; it transpired that these could be effectively taken care of by updating an existing Letter of Agreement (LoA), future-proofing processes where procedure change was expected and expanding the DA notification system. Again, work continues to fulfil these requirements and all parties are in agreement on a way forward.

6 General Concerns

- 6.1 A small proportion of key stakeholders who did not object to the ACP nonetheless required assurances that certain aspects would be addressed; the main themes are detailed as follows:
- 6.2 **Assurance that the Expansion of the DAs would not invoke an increase in the number of occasions OEPs were closed.**

From stage one of the ACP, NATS En-route have been fully engaged in the development of the new DA complex. The boundary lines are drawn parallel to existing air routes with the necessary 'buffer' and have been future-proofed for the introduction of Route Free Airspace⁴. One of the advantages identified early in the process was the possibility of reducing the number of OEP closures over a 12 month period utilising the proposed areas. This not only improves efficiency in the Air Traffic Services (ATS) route system but also potentially reduces CO₂ emissions. In addition, strict protocols will be put in place that will limit the occasions when three or more OEPs are closed due to Range activity.

- 6.3 **Concurrent DA and Exercise Area activity causing unacceptable funnelling effect on transatlantic tracks must be avoided.**

On the rare occasions when specific combinations of the proposed DAs are active and other adjacent MoD DAs are also active, concern was raised that there may be insufficient airspace to route transatlantic tracks. In order to manage this issue, the process by which the Range is activated will be modified;

³ Both objections were from members of the aviation community.

⁴ NATS (en route) proposal to introduce Route Free Airspace late 2014.

this will ensure the appropriate authorities have sufficient oversight and input into both the planning and activation of the DAs in order to provide the necessary deconfliction. This will include greater involvement by the Military Airspace Booking Coordination Cell (MABCC) at Swanwick in the planning and NOTAM booking process for the Hebrides Range.

6.4 The new DAs will necessitate existing LoAs to be updated to capture agreed processes and procedures.

The ACP is reliant on two main LoAs being ratified prior to implementation. Work has progressed well on both these draft LoAs; main principles have been agreed and general consensus reached. There is confidence that they will be in a mature state as the ACP enters Stage 5⁵. Due to the dynamics of regulatory change and new procedures that are likely to be brought in during stages 5 and 6⁶ it will not be possible to have the finalised LoAs until closer to implementation date.

6.5 Access to the new DAs should not be more difficult than for today.

As a direct result of the ACP activity invoking dialogue and engagement with other airspace users, several matters have been revealed that are now being addressed either through formalised lines of communication or an update of processes. This will enhance current procedures and should lead to more efficient access to the new DAs. This is considered a positive result associated with the ACP process.

6.6 Non-Airspace Related Concerns.

There were other concerns raised by non-aviation associated organisations. However, these were not directly related to airspace and in all cases they were matters relevant to current activities occurring in the Range. These activities will not alter as a result of the ACP and therefore were considered outside the scope of the proposal. Notwithstanding, these views were forwarded to the appropriate authorities for consideration and will be included, with all other consultation documentation, in the formal ACP submission to the CAA.

6.7 The MoD and QinetiQ would like to thank all those who responded to this consultation. These responses have been analysed by air traffic management and range specialists familiar with the local airspace. The main issues raised are summarised in this feedback document and, where appropriate, will be considered in pending LoAs or revised local procedures.

⁵ Stage 5 of the ACP process – Regulatory Decision.

⁶ Stage 6 of the ACP process – Implementation.

7 Next Steps

7.1 The final submission of the ACP will be presented to the CAA for Stage 5 of the process. Here the ACP and supporting documentation (including draft LoAs), will be scrutinised by the necessary subject matter experts before being presented to the CAA Director Safety & Airspace Regulation Group (SARG) for approval. This process is likely to take approximately 16 weeks. During this period the MoD, as ACP Sponsor, may be called upon to answer supplementary questions or queries that may arise during the scrutiny. The draft LoAs will continue to be refined to reflect any regulatory changes or external procedure changes that may occur during this period and Range Orders/Instructions will also be updated accordingly.

7.2 Although the formal consultation period ended on 20th December 2013, organisations may still present new evidence or data to the Director SARG for his consideration prior to making his regulatory decision regarding this ACP. The representative organisation should submit, in writing, the information to the following address:

Director
Safety & Airspace Regulation Group
CAA House
45-59 Kingsway
London
WC2B 6TE

7.3 Providing approval is given, the ACP will move to Stage 6 - Implementation. The proposed implementation date remains 8th January 2015 aligned to an Aeronautical Information Regulation And Control (AIRAC) cycle date. Prior to implementation and immediately following approval, various organisations will commence the process of updating Aeronautical Information Documentation, local orders and instructions and applicable aviation and maritime maps and charts.

8 List of abbreviations

AIP	Aeronautical Information Publication
ACP	Airspace Change Proposal
AIRAC	Aeronautical Information Regulation And Control
ATC	Air Traffic Control
ATS	Air Traffic Service(s)
CAA	Civil Aviation Authority
CO ₂	Carbon Dioxide
FUA	Flexible Use of Airspace
LoA	Letter of Agreement
MoD	Ministry of Defence
MABCC	Military Airspace Booking and Coordination Cell
NATS	National Air Traffic Services
NOTA	North Atlantic Transition Area
NOTAM	Notice to Airmen
OEP	Oceanic Entry Points
SARG	Safety & Airspace Regulation Group

Distribution List

This document is being distributed to all of the following:

Danger Area Airspace Manager (DAAM)	Aircraft Owners and Operators Association (AOPA)
NATS - Prestwick Centre (PC)	Airport Operators Association (AOA)
Joint Future Airspace Development Team (JFADT)	British Air Line Pilots Association (BALPA)
Military Users Airspace Co-ordination Team (MUACTION)	British Air Transport Association (BATA)
Airspace Management Cell (AMC)	British Balloon and Airship Club (BBAC)
QinetiQ Flying Organisation (QFO)	British Business & General Aviation Association (BBGA)
Military Airspace Manager, MOD	British Gliding Association (BGA)
Land Warfare Centre	British Hang Gliding and Paragliding Association (BHPA)
Maritime Warfare Centre	British Helicopter Advisory Board (BHAB)
Air Warfare Centre	British Microlight Aircraft Association (BMAA)
MOD Navy Command	British Parachute Association (BPA)
MOD Air Command	General Aviation Safety Council (GASCo)
MOD Hebrides Range	Guild of Air Pilots and Air Navigators (GAPAN)
UK-Ireland Functional Airspace Block (FAB)	Guild of Air Traffic Control Officers (GATCO)
Irish Aviation Authority (IAA)	Heavy Airlines
EUROCONTROL Director of Network Management (DNM)	Helicopter Club of Great Britain (HCGB)
National Air Traffic Management Advisory Committee (NATMAC)	Light Aircraft Association
Highlands and Islands Airports Ltd (HIAL)	Light Airlines
Loganair	NATS Ltd
National Trust for Scotland	NATS Airspace Planning Team
Joint Nature Conservation Committee (JNCC)	PPL/IR Europe
Maritime and Coastguard Agency	Swanwick Operations
Scottish Government Department of Energy and Climate Change	UK Airprox Board (UKAB)
Scottish Natural Heritage (SNH)	UK Flight Safety Committee
The Crown Estate (TCE)	
Western Isles Council	