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# AIRSPACE CHANGE PROPOSAL - ACP-2021-078

# Introduction

In order to support NATO, the US Air Force is making significant infrastructure investments on airbases in the UK and other allied nations. There is an emerging requirement for military aircraft, including Remotely Piloted Aircraft Systems (RPAS), to operate regularly from RAF Fairford. Although any RPAS will be operated by fully qualified pilots, it is anticipated that they will not have the required onboard Detect and Avoid (DAA) capability to permit flight in unsegregated airspace. In accordance with Civil Aviation Publication (CAP) 722 – Unmanned Aircraft System Operations in UK Airspace – Guidance and Policy, beyond visual line of sight (BVLOS) operations require either a Civil Aviation Authority (CAA)-approved DAA capability or to remain within a block of airspace that is segregated from other airspace users.

# **Airspace Change Proposal**

The Ministry of Defence (MOD) has initiated an Airspace Change Proposal (ACP) to establish suitable segregated airspace to enable RPAS operations from RAF Fairford.

Changes to UK airspace are legally required to follow the process laid down in the CAP1616, details of which can be found online<sup>1</sup>. Following this process ensures a fair and transparent flow of information between the Change Sponsor and any affected stakeholders. It also ensures that the changes are not arbitrarily applied without full engagement and formal consultations. The CAA, as an impartial regulator, will hold Change Sponsors to account and ensure that CAP1616 is followed correctly as part of its decision-making responsibility.

The CAP1616 process comprises seven stages. The stages are each considered by the CAA separately and sequentially. The process is not solution-driven, and each stage informs the next. In this instance, the requirement is to fly RPAS between RAF Fairford and medium or high-level transit routes in and out of UK airspace. This has been presented to the CAA at Step 1a of Stage 1 of the ACP process and the CAA has agreed that an airspace change is an appropriate means by which to achieve the MOD's requirement. Details of this step can be found on the CAA's online airspace change portal<sup>2</sup>. The MOD will follow the next steps of CAP1616 to develop options which will help to deliver the most appropriate solution and address the requirement.

<sup>&</sup>lt;sup>1</sup> CAP1616: Airspace change: Guidance on the regulatory process for changing the notified airspace design and planned and permanent redistribution of air traffic, and on providing airspace information (caa.co.uk)

<sup>&</sup>lt;sup>2</sup> Airspace change proposal public view (caa.co.uk)

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# Stage 1 Step 1b - Design Principles

The generation of options for any new airspace or procedures first requires airspace design principles to be developed. The Design Principles stage lies within the first stage of the CAP1616 process. The MOD is keen to engage with stakeholders and is asking for your feedback.

At this early stage, it is given that airspace changes will be required within the vicinity of the RAF Fairford, but it is not known whether they will be restricted to the vicinity or whether changes will be required at greater distances from the base. For this reason, the MOD has elected to select its aviation stakeholders from an area within a radius of approximately 30 miles from RAF Fairford and to use the National Air Traffic Management Advisory Committee (NATMAC) as a means of broader engagement.

The MOD has compiled a set of draft design principles, which are presented here for your comment. When finalised, these design principles will be utilised to inform the development and design of any airspace change options. The MOD would like to understand which elements of the airspace design principles you, as another airspace user, deem important and would like to be considered.

You are now invited to consider the design principles. The list below is not exhaustive, but you may like to comment on the following:

- Are there any other design principles you would like the MOD to consider?
- Would you like the MOD to discount any of its draft design principles?
- Should the MOD prioritise some design principles ahead of others?
- Do you require / would you like any more detail to be included in the design principles?

The MOD views principles a and b as its priorities because:

- Safety is paramount and underpins all airspace change.
- Access to sufficient suitable airspace for efficient transit will be key to RPAS achieving operational objectives in support of NATO.

Any additional detail and reasoning behind your feedback is encouraged.

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The MOD's draft design principles, as a basis for engagement, are below.

The design should:

	Design Principle	Rationale
а	Provide a safe environment for airspace users	A planning assumption is that no CAA-approved DAA will be available on any RPAS operating from RAF Fairford, hence segregated airspace is required to enable safe BVLOS operations in Class G airspace.
b	Provide access to sufficient suitable airspace to enable efficient RPAS transition between the ground and medium/high-level transit routes	The volume of airspace must be large enough to allow an RPAS to fly its procedures while remaining segregated from other airspace users and also provide efficient routing, which will minimise the time segregated airspace is required and support the achievement of operational objectives.
С	Where possible and practicable, accommodate the Airspace Modernisation Strategy <sup>3</sup>	The MOD supports the CAA's current and emerging Airspace Modernisation Strategy (which commits to facilitating defence and security objectives) but may not be able to accommodate all aspects due to operational requirements.
d	Minimise the impact to other airspace users	The MOD understands that introduction of segregated airspace has an impact on other airspace users and will endeavour to utilise a variety of methods to minimise those impacts where possible, given that the primary reason for the airspace change is to accommodate RPAS operations e.g. minimise volume and activation time, enabling access where possible.
е	Use Flexible Use of Airspace <sup>4</sup> (FUA) principles to manage the airspace as far as is practicable	FUA principles of airspace management enable civil/military coordination that can improve efficiency and airspace sharing for both. This is particularly important given that the primary user will not have CAA-approved DAA capability.

# **How to Provide Feedback**

Feedback on the proposed Design Principles should be sent to:

The Airspace Change Sponsor for this airspace change at <a href="mailto:DAATM-AirspaceConsultation@mod.gov.uk">DAATM-AirspaceConsultation@mod.gov.uk</a>

All the details of this ACP are available on the CAA's airspace change portal. The identification number is ACP-2021-078. Although, at this stage, the request is for feedback on Design Principles, general feedback on the proposed change and what is important to you can be left at any point of the process on the portal at:

Airspace change proposal public view (caa.co.uk)

Please advise if you require further engagement and, if so, your preferred point of contact.

Reponses regarding the draft Design Principles must be received by 10 Jan 2022.

<sup>&</sup>lt;sup>3</sup> About the strategy | UK Civil Aviation Authority (caa.co.uk)

<sup>&</sup>lt;sup>4</sup> Skybrary - Flexible Use of Airspace.