

**MINUTES OF ENABLING TEMPORARY RPAS OPERATIONS FROM RAF FAIRFORD ASSESSMENT MEETING HELD VIA MICROSOFT TEAMS ON 4 APRIL 2022**

4 April 2022

All invitees

<b>Present</b>	<b>Appointment</b>	<b>Representing</b>
Mark Jones	Airspace Regulator (Technical) and Case Officer	CAA
Tom Gratton	Airspace Regulator (Utilisation)	CAA
Ayesha Twyman	Airspace Regulator (Consultation/Engagement)	CAA
Camilla Jago-Lewis	Airspace Regulator (Technical)	CAA
Sean Garner	Principal Airspace Regulator	CAA
Kate Read	DAATM Airspace Strategy/Sponsor	MOD
Paul Burchill	USAFE A3	USAFE
John Gladney	USAFE A3	USAFE

**Apologies**

James Fuller	UK ATC Liaison Officer	USAFE
John Cookson	Airspace Regulator (Environment)	CAA
Shaun Bowler	Air Traffic Stds Insp (En-Route Operations/SWK)	CAA

**Temporary Airspace Change Assessment Meeting Opening Statement**

CAA noted that the following were received in advance of the Assessment Meeting and confirmed that the documents must be published by the Change Sponsor, together with the minutes of the meeting, on the airspace change portal

- Assessment meeting agenda
- Assessment meeting presentation

CAA explained that the purpose of the Assessment Meeting, as set out in CAP 1616, was for the Change Sponsor to present and discuss their Statement of Need, provide information on how it intended to fulfil the requirements of the airspace change process and present its provisional timescales. Lastly, the Change Sponsor was required to provide information on how it intended to meet the engagement requirements of the process.

	<b>ACTION</b>
<p><b>Item 1 – Introduction</b></p> <p>All attendees were introduced, and the opening statement was read out.</p>	
<p><b>Item 2 – Statement of Need (discussion and review)</b></p> <p>The sponsor introduced the Statement of Need as follows:</p> <p>There is already an Airspace Change Proposal (ACP-2021-078) in progress to establish a suitable permanent airspace structure to enable BVLOS RPAS transition between RAF Fairford and medium- or high-altitude transit, with anticipated implementation from summer 2023. There is now an additional requirement to enable some BVLOS RPAS activity through spring 2023, therefore a suitable temporary airspace structure needs to be established to support.</p> <p>The Statement of Need for ACP-2021-078 was also presented as a reference. There were no comments.</p>	

**Item 3 – Issues or opportunities arising from proposed change**

The sponsor outlined that:

Issues:

- There is a working assumption of no approved Detect and Avoid capability – segregation expected
- It is understood that there is a maximum 90-day TDA duration, but this ACP is aiming to bridge gap to permanent ACP implementation, which may be longer
- There is a congested Feb AIRAC due to NATS ACP implementations, which may impact on timeline
- The airspace will be used for multiple RPAS, thus separate approval, procedures, etc. will be required
- MAA will only regulate for UK military aircraft/systems, therefore all approvals will need to come via CAA
- The concurrent TDA ACP and permanent ACP may cause confusion and engagement fatigue so will need to be carefully managed

Opportunities:

- The TDA engagement feedback can be used to help shape permanent ACP work
- This ACP and adjacent work may be able to support airspace integration for future RPAS

As a post scriptum from the CAA:

These are two separate processes, engagement on one should not be used for the other, but arguably some of the outputs/outcomes /learning from one process could feed into the other.

The outcome of either of those processes should not pre-empt the outcome on the other process.

Should the sponsor wish to, the sponsor can submit their engagement materials to the CAA for review, ahead of engagement activity.

The Case Officer asked for clarification of the MAA vs CAA approvals. The sponsor explained that the MAA would not be able to provide and approvals for operating or integration due to all RPAS being US military.

**Item 4 – Process requirements**

**i. TDA Policy Statement**

The Case Officer directed the sponsor to the TDA policy statement, which provides further detail on the requirements and supplements the process described in CAP 1616.

**ii. Stakeholder engagement**

The Consultation/Engagement Regulator recommended early work on stakeholder identification (airspace users, ANSPs, drone operators, NATMAC) and engagement strategy (what, why, method, timeline). They reminded the sponsor of the importance of retaining engagement evidence, which will need to be included in the ACP submission. It is expected that the sponsor will present a summary of the engagement feedback and demonstrate how it affected the proposal, either in a table of all feedback (preferred) or presented by themes. If expected to affect civil traffic patterns below 7000ft, the sponsor must identify and engage with appropriate community stakeholders. The Consultation/Engagement Regulator emphasised the importance of having an effective complaint monitoring system in place, that timely uploading of documents to the portal

would help to support transparency and advised that only the CAA is the arbiter of whether the CAP 1616 process has been followed correctly.

Links to the relevant guidance in CAP1616 (including environmental guidance for temporary processes in Appendix B) and the CAA's Policy for Permanently Established Danger Areas and Temporary Danger Areas were forwarded to the sponsor by the CAA.

The Case Officer stated that the environmental requirements for a TDA differ to a permanent ACP and can be found in CAP 1616 appendix B. They agreed to email through a copy of the advice provided by the Environmental Regulator, who was unable to attend the meeting.

As a post scriptum from the CAA:

The environmental guidance from CAP 1616 was provided to the sponsor via email following the assessment mtg and an additional mtg with the Environmental Regulator has been arranged to provide further guidance.

The guidance was as follows:

- ANG para 2.13 requires the CAA to consider the sponsor's assessment of the noise impact of each proposed temporary change to airspace design, unless the CAA is satisfied that the specific details in the proposal mean that this is not needed;
- As the sponsor of the ACP is MoD, the scope of the noise assessment only needs to consider the consequential impacts on civil aviation.
- Only noise needs to be assessed as all other environmental impacts are likely to be negligible due to the short-term nature of a temporary change. Should the airspace be extended beyond 90-days the environmental requirements would need to be re-assessed and possibly expanded. Any extensions should not be granted simply to minimise the amount of effort required by the sponsor when pursuing the full airspace change approval process;
- CAP1616 B83 requires that the detail of the noise assessment is agreed with the CAA at an early stage. The sponsor should contact the CAA to discuss and agree their proposed methodology. Due to the short-term nature, there is no requirement to produce any LAeq noise contours or monetised WebTAG outputs as the temporary change is unlikely to lead to adverse noise impacts.
- The CAA recommends the assessment uses any pertinent information already collected for the permanent solution.
- In addition to the noise assessment, for changes with impacts below 7,000 feet, appropriate level of engagement must be carried out with the communities impacted prior to us giving approval for its implementation (ANG para 2.13).
- CAP1616 B83 sets out how those impacted should be informed, and the CAA recommends the sponsor aligns these requirements with the proposed noise assessment to avoid duplicating work:
  - Justification for the change, and confirmation of its effective period, this justification should highlight why this temporary change is needed alongside the permanent solution;
  - Details of the frequency of flights and typical altitudes;
  - A qualitative description of changes to traffic patterns, illustrated using operational diagrams;
  - Typical noise levels at key locations. In addition, it's recommended the noise levels are put into context and compared with everyday sounds (for example a washing machine at 1m).

### **iii. Safety Assessment**

The Case Officer clarified that the operating safety case described in CAP 722 is not required for this ACP as it will be replaced by the CAA approval to operate in the UK, which is a parallel, ongoing piece of work between the Airspace Regulator involved in RPAS Airspace Integration and USAFE.

**Item 5 – Provisional timescales**

The sponsor presented the following proposed timescale for discussion:

- Final submission to CAA – 9 Dec 22
- CAA decision (28 days) – 27 Jan 23
- AIRAC submission – 17 Feb 23
- AIP Sup\* submission – Mar 23
- AIP Sup\* publication – Apr 23
- AIRAC publication – 6 Apr 23
- AIRAC effective – 18 May 23
- Implementation – 18 May 23
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\*AIP Sup dates after end 2022 are not yet available but have been requested from AIS.

The sponsor stated that the actual requirement would likely be from April 2023, but that the major AIRAC cycle dates and already-planned systems updates due spring 2023 would not support this. The Case Officer stated that, for the TDA submission, only the AIP Sup dates would need to be considered, not the AIRAC cycle (for publications or for systems). The sponsor stated that conflicting advice had been received from NATS. The Case Officer agreed to seek clarification on the AIS requirements but suggested that the sponsor revise the timeline taking into account only the operating needs of USAFE and the AIP Sup dates. The Airspace Regulator involved in RPAS Airspace Integration clarified that the 2023 Sup dates can be predicted based on the pattern for 2022 dates.

The sponsor discussed management of this TDA ACP alongside the permanent ACP, and the desire to aim for a TDA that is as close as possible to the preferred option that is developed in the permanent ACP. The Case Officer advised that there is no need to align the airspace design completely. The Airspace Regulator involved in RPAS Airspace Integration added that, due to the temporary nature of a TDA, the CAA may accept a design that would not necessarily be accepted for a permanent structure.

The Case Officer gave an overview of the temporary ACP process in comparison to a permanent ACP, which stages need to be completed and that the sponsor needs to justify suitable scaling and what content they have deemed relevant. They iterated that the final proposed design must take into account feedback. It was clarified that the submission date and decision date need to be 28 days apart, but there is no specific day/time of month to align to.

**Revised Provisional Timescale**

- Final submission to CAA – 9 Dec 22
- CAA decision (28 days) – 20 Jan 23\*
- AIP Sup submission – 27 Jan 23
- AIP Sup publication – 9 Mar 23
- Implementation – 1 Apr 23

\*Extra 14 days proposed between submission and decision due to Christmas and New Year leave

**Item 6 – Next steps**

The Consultation/Engagement Regulator iterated that the sponsor should read CAP 1616 appendix B to understand the environmental requirements, and that early engagement with Environmental Regulator to discuss the plan is recommended. The Case Officer agreed to review the guidance on AIRAC vs AIP Sup and provide clarification to the sponsor, and also to send the environmental guidance by email. They requested that the sponsor review the timeline and propose dates that meet the operational requirement. The sponsor agreed to provide the revised timeline within the meeting minutes.

CAA Comment:

<ul style="list-style-type: none"> <li>• Environmental requirements have been clarified in these minutes and in a mtg between the Sponsor and the CAA Environmental Regulator.</li> <li>• The requirement is for an AIP Sup to be submitted for the temporary change and the revised provisional timeline has been approved.</li> </ul> <p>The Case Officer advised that the sponsor should provide the draft minutes within one week and once agreed, upload to the airspace change portal within two weeks of the meeting.</p>	
<p><b>Item 7 – Any Other Business</b></p> <p>The Case Officer thanked everybody for attending and advised the Sponsor that the CAA team would be available for advice throughout the process.</p>	

## ACTIONS ARISING FROM ACP-2022-008 ASSESSMENT MEETING

<b>Subject</b>	<b>Name</b>	<b>Action</b>	<b>Deadline</b>
AIS Requirements	Mark Jones	Review requirements for TDA AI submission and provide clarity on whether AIP Sup will capture all or if systems will need to be updated using one of the major AIRAC dates.	18 Apr 22
Environmental Advice	Mark Jones	Provide the sponsor with email advice from the Environmental Regulator.	11 Apr 22
Timeline Revision	Kate Read	Provide a revised timeline based on operational requirements and the AIP Sup dates for 2023.	11 Apr 22
Meeting Minutes	Kate Read	Write draft minutes within one week on meeting.	11 Apr 22
ACP Portal	Kate Read	Upload agreed minutes to the portal.	18 Apr 22

Kate Read  
ACP Sponsor