



Ministry  
of Defence

**ACP-2021-078**  
**Enabling Remotely Piloted Aircraft Operations**  
**from RAF Fairford**

**Stage 2 – Develop and Assess**

**Design Options**  
**Stakeholder Engagement**

## Introduction

This document forms part of the overall submission for Stage 2 of ACP-2021-078 in accordance with the requirements set out in CAP1616, providing evidence of stakeholder engagement

## Methodology

To test the initial Design Options against the Design Principles, the Sponsor engaged with the same stakeholders identified ahead of the Stage 1B engagement, and those who made contact during that engagement and were added to the engagement matrix for future communications. As the initial Design Options could potentially affect stakeholders outside of the region previously used for stakeholder identification, further analysis of aeronautical charts was conducted to identify any new stakeholders for Stage 2.

Stakeholders (listed in Annex A) were categorised according to the following groups:

- National Air Traffic Management Advisory Committee (NATMAC) members
- Local aviation stakeholders
- Local County and District Councils
- Other national and local organisations

Stakeholders were engaged in writing, via a letter distributed by email on Thu 5<sup>th</sup> May, with responses requested by a deadline of Thu 1<sup>st</sup> Jun. The 4-week period was deemed sufficient to allow stakeholders to onward distribute where required, consider the information presented and prepare meaningful feedback. A feedback form was provided to assist with the Design Principle evaluation and also included some questions covering general views on the proposed options. Both the letter and feedback form were uploaded to the ACP portal promptly after being emailed out.

The engagement email and letter also requested that any stakeholders who considered that their operations would be adversely impacted by the proposal contact the Sponsor at the earliest opportunity, ideally ahead of the feedback deadline, in order that there could be further discussion about those potential impacts and to assist the ACP team in defining the baseline of aviation activity in the areas affected.

## Engagement Timeline Overview

Date	Action	Remarks
26 Apr 22	Formal engagement with Brize Norton ATC	F2F at RAF Brize Norton
27 Apr 22	Formal engagement with 78 Sqn	F2F at NATS Swanwick

5 May 22	Engagement letter and feedback form emailed to stakeholders.	Feedback requested by 1 Jun 22.
24 May 22	Formal engagement with NATS	F2F at NATS Swanwick
1 Jun 22	Feedback deadline	15 responses
7 Jun 22	Follow up engagement with London Oxford Airport	Via Microsoft Teams
7 Jun 22	Follow up engagement with VOWH Flight Centre	Via Microsoft Teams
8 Jun 22	Follow up engagement with BGA	Via Microsoft Teams

A total of 79 stakeholders were engaged with during Stage 2, with 16 responses received. Of these 6 utilised the feedback form provided, with others either providing a feedback narrative or simply stating no comment/impacts.

There were three follow-up meetings held via Teams to discuss potential impacts of the proposed options. There was also an in-person meeting held with NATS, which covered both impact of the initial Design Options and work associated with the operational aspects of the proposed activity. Minutes of the meetings have been uploaded to the ACP portal.

In-person sessions with 78 Sqn and RAF Brize Norton ATC covered potential impacts of the Design Options and methods to minimise, as well as aspects of operational procedures that will need to be established prior to any RPAS operations taking place. Emails summaries can be found in Annex F.

## **Summary of Feedback**

The information provided in the feedback forms has been collated and can be seen in Annex B. Raw feedback forms can be found in Annex C and emailed feedback at Annex D.

## **Alignment with Design Principles**

The feedback broadly indicated that Option 0 does not align with the majority of Design Principles and that the four MALE and two HALE options do align with the Design principles.

There were some conflicting responses regarding DP e (accommodation of the AMS). This was acknowledged as likely during Stage 1 because the AMS covers a wide range of objectives and different stakeholders will perhaps place value on the objectives that align most with delivering their operations.

## **Best Delivery of Design Principles**

Stakeholders expressed a preference for option MALE 4, which involves only a segregated cylinder from the surface to base of controlled airspace and then integration to facilitate onward transit, because this will have the least impact on

other airspace users. There was no specific preference expressed between the HALE options.

### **Alternative Options to Consider**

There was a suggestion that the Sponsor consider use of extant Radar Corridors (RC)<sup>1</sup>, which are positioned to minimise the impact of OAT transits on GAT traffic. Although the Westcott and Swindon Corridors may be at viable MALE transit levels (FL230 and FL240), the others are generally lower and may not meet the flight profile requirements. There is also uncertainty about whether the RCs would be deemed as segregated in their current guise or if they would require amendment to their status to provide segregation. If integration is permitted, use of RCs can certainly be explored.

Several stakeholders stated that the radius of segment A (6NM) is too big and questioned why such a large diameter is required for RPA operations. During planning, the ACP team has worked closely with RPA operators to ensure that they understand that only the minimum volume of airspace required to operate safely should be requested for segregation. This point will be reiterated.

It was suggested that the segments and TCs proposed are each too large a volume and that 3hrs is too long for a large volume to be active. An alternative is that they could be split down into smaller volumes that can be individually activated or deactivated in turn. This was initially not included as it introduces more complexity to the Design Options but can be considered if it will help to reduce impact on the identified traffic. Provision of DACS was thought to be a less complicated way of reducing impact, by enabling access, and feedback was generally in favour of DACS being available, however it has been identified that DACS may not be a suitable mitigation for traffic in the ATS network that will experience flight planning constraints based on the activation NOTAMs, without the ability to tactically resolve.

### **Impact on Operations**

Feedback indicated that the proposed options could affect civil traffic in the ATS network, departing and arriving at London Oxford Airport and HEMS transits. Further engagement will be required as the options are developed to consider suggested measures to minimise impact.

Although the impacts of and on military traffic do not need to be taken into account during environmental impact assessment, it is still important to ensure that those impacts are understood and measures taken to minimise, or agreements put in place to acknowledge priorities. The ACP team will continue internal MOD engagement throughout this process.

Several stakeholders provided feedback on impact to their aviation operations based on daytime activations. These comments have been noted, but the intent is for activations to be kept within the window 1hr after sunset to 1hr before sunrise,

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<sup>1</sup> See UK Military AIP ENR 6-3

therefore only impact on operations during that window will be used to assist with options appraisal.

## **Annexes**

- A. Stakeholder Lists
- B. Collated Feedback on Alignment with Design Principles
- C. Stakeholder Feedback Forms
- D. Stakeholder Feedback Emails
- E. Feedback Request Emails
- F. Engagement Meeting Emails

**Annex A to  
ACP-2021-078  
Design Options  
Stakeholder Engagement**

**Stakeholder Lists**

The following stakeholders received an email with attached letter containing a refresher of the ACP background, the final list of design principles and written explanation of the initial proposed design options:

<b>NATMAC Stakeholders</b>		
Aircraft Owners and Pilots Association (AOPA UK)	Airport Operators' Association (AOA)	Airfield Operators' Group (AOG)
Airspace4All (A4A)	Airspace Change Organising Group (ACOG)	Aviation Environment Federation (AEF)
Association of Remotely Piloted Aircraft Systems UK (ARPAS UK)	British Airline Pilots' Association (BALPA)	British Balloon and Airship Club (BBAC)
British Business and General Aviation Association (BBGA)	British Gliding Association (BGA)	British hang Gliding and paragliding Association (BHPA)
British Helicopter Association (BHA)	British Microlight Aircraft Association (BMAA)	British Model Flying Association (BMFA)
British Skydiving	Drone Major	General Aviation Alliance (GAA)
General Aviation Safety Council (GASCo)	Guild of Air Traffic Controllers (GATCO)	Heavy Airlines
Helicopter Club of Great Britain (HCGB)	Light Aircraft Association (LAA)	Ministry of Defence (MOD)
National Air Traffic Services (NATS)	PPL/IR Europe	The Honourable Company of Air Pilots (HCAP)
UK Airprox Board (UKAB)	UK Flight Safety Committee (UKFSC)	National Police Air Service (NPAS)

<b>Local Aviation Stakeholders</b>		
Bath, Wilts and North Dorset Gliding Club	Bristol & Gloucestershire Gliding Club / Nympsfield Airfield	Bristol Airport
Charlton Park Airfield	Clench Common Microlight Site, Marlborough	Cotswold Airport (Kemble)

Cotswold Gliding Club / Aston Down Airfield	Dalton Barracks, Abingdon	Draycott Aerodrome, Swindon
Enstone Airfield	Gloucestershire Airport	London Oxford Airport
Membury Airfield	Oaksey Park Airfield, Malmesbury	RAF Benson
RAF Brize Norton	RAF Little Rissington	RAF Weston-on-the-Green
Rendcomb Airfield	RLC Silver Stars, South Cerney	South Cerney, Cloudbase Paragliding
Vale of the White Horse Gliding, Sandhill Farm	West Wales Airport	Wiltshire Microlight Centre, Calne
Bidford Gliding & Flying Club	Ledbury Airfield	Shobdon Airfield

<b>Local Authority Stakeholders</b>		
Fairford Town Council	Cotswold District Council	Swindon Borough Council
Vale of White Horse District Council	West Oxfordshire District Council	Gloucester City Council
Gloucestershire County Council	Oxfordshire County Council	Warwickshire County Council
Wiltshire County Council	Worcestershire County Council	

<b>Other Local and National Organisations</b>		
Campaign to Protect Rural England	Cotswold AONB	County Land and Business Association
Environment Agency	Local Resilience Forum	Natural England

<b>Individuals</b>		
██████████	██████████	██████████

**Annex B to  
ACP-2021-078  
Design Options  
Stakeholder Engagement**

**Collated Feedback on Alignment with Design Principles**

Design Principle		Option 0	MALE 1	MALE 2	MALE 3	MALE 4	HALE 1	HALE 2
<b>a</b>	Provide a safe environment for airspace users	No	Yes	Yes	Yes	Yes	Yes	Yes
		Yes	Yes	Yes	Yes	Yes	Yes	Yes
		Yes	Yes	Yes	Yes	Yes	Yes	Yes
		No	Yes	Yes	Yes	Yes	Yes	Yes
		Yes	Yes	Yes	Yes	Yes	Yes	Yes
		Yes	Yes	Yes	Yes	Yes	Yes	Yes
<b>b</b>	Provide access to sufficient suitable airspace to enable efficient RPAS transition between the ground and medium/high-level transit routes	No	Yes	Yes	Yes	Yes	Yes	Yes
		No	No	No	No	No	No	No
		Yes	Yes	Yes	Yes	Yes	Yes	Yes
		No	Yes	Yes	Yes	Unknown	Yes	Yes
		No	Yes	Yes	Yes	Yes	Yes	Yes
		No	Yes	Yes	Yes	Yes	Yes	Yes
<b>c</b>	Minimise the impact to other airspace users	Yes	Yes	Yes	Yes	Yes	Yes	Yes
		Yes	Yes	Yes	Yes	Yes	Yes	Yes
		Yes	Yes	Yes	Yes	Yes	Yes	Yes
		Yes	No	No	No	No	No	No
		Yes	Yes	Yes	Yes	Yes	Yes	Yes
		Yes	Yes	Yes	Yes	Yes	Yes	Yes
<b>d</b>	Adhere to FUA principles and strategy	No	Yes	Yes	Yes	Yes	Yes	Yes
		NA	No	No	No	No	No	No
		Yes	Yes	Yes	Yes	Yes	Yes	Yes
		Yes	Yes	Yes	Yes	Yes	Yes	Yes
		No	Yes	Yes	Yes	Yes	Yes	Yes
		No	Yes	Yes	Yes	Yes	Yes	Yes
<b>e</b>	Where possible and practicable, accommodate the Airspace Modernisation Strategy	No	No	No	No	No	No	No
		NA	Unknown	Unknown	Unknown	Unknown	Unknown	Unknown
		Yes	Yes	Yes	Yes	Yes	Yes	Yes
		No	Yes	Yes	Yes	Yes	Yes	Yes
		No	Yes	Yes	Yes	Yes	Yes	Yes
		No	Yes	Yes	Yes	Yes	Yes	Yes



f	Endeavour to make the airspace as accessible as possible	Yes NA Yes Yes Yes Yes	Yes Unsure Yes Yes Yes Yes	Yes Unsure Yes Yes Yes Yes	Yes Unsure Yes Yes Yes Yes	Yes Unsure Yes Yes Yes Yes	Yes Unsure Yes Yes Yes Yes	Yes Unsure Yes Yes Yes Yes
g	Minimise the environmental impact of non-participating aircraft	Yes NA Yes Yes Yes Yes	No Unknown Yes Unsure Yes Yes	No Unknown Yes Unsure Yes Yes	No Unknown Yes Unsure Yes Yes	No Unknown Yes Unsure Yes Yes	No Unknown Yes Unsure Yes Yes	No Unknown Yes Unsure Yes Yes

Stakeholder Feedback Forms

Bristol and Gloucestershire Gliding Club

1. Do you assess that the presented design options achieve the design principles? (Please elaborate as required)

Design Principle		Option 0	MALE 1	MALE 2	MALE 3	MALE 4	HALE 1	HALE 2
a	Provide a safe environment for airspace users	No	Yes	Yes	Yes	Yes	Yes	Yes
b	Provide access to sufficient suitable airspace to enable efficient RPAS transition between the ground and medium/high-level transit routes	No	Yes	Yes	Yes	Yes	Yes	Yes
c	Minimise the impact to other airspace users	Planned night operations will not affect gliding	Day activation would have big impact. The planned night operations will not affect gliding	Day activation would have big impact. The planned night operations will not affect gliding	Day activation would have big impact. The planned night operations will not affect gliding	Day activation would have big impact. The planned night operations will not affect gliding	Day activation would have big impact. The planned night operations will not affect gliding	Day activation would have big impact. The planned night operations will not affect gliding
d	Adhere to FUA principles and strategy	no	If only activated by Notam when the airspace volume required for BVLOS operations.	If only activated by Notam when the airspace volume required for BVLOS operations.	If only activated by Notam when the airspace volume required for BVLOS operations.	If only activated by Notam when the airspace volume required for BVLOS operations.	If only activated by Notam when the airspace volume required for BVLOS operations.	If only activated by Notam when the airspace volume required for BVLOS operations.

e	Where possible and practicable, accommodate the Airspace Modernisation Strategy	Only if DAA technology was available and operational	Only if DAA technology was available and operational	Only if DAA technology was available and operational	Only if DAA technology was available and operational	Only if DAA technology was available and operational	Only if DAA technology was available and operational	Only if DAA technology was available and operational
f	Endeavour to make the airspace as accessible as possible	yes	Only if activated by Notam when the airspace volume required for BVLOS operations and Danger Area Crossing Service available.	Only if activated by Notam when the airspace volume required for BVLOS operations and Danger Area Crossing Service available.	Only if activated by Notam when the airspace volume required for BVLOS operations and Danger Area Crossing Service available.	Only if activated by Notam when the airspace volume required for BVLOS operations and Danger Area Crossing Service available.	Only if activated by Notam when the airspace volume required for BVLOS operations and Danger Area Crossing Service available.	Only if activated by Notam when the airspace volume required for BVLOS operations and Danger Area Crossing Service available.
g	Minimise the environmental impact of non-participating aircraft	yes	Not if they are required to deviate from direct route.	Not if they are required to deviate from direct route.	Not if they are required to deviate from direct route.	Not if they are required to deviate from direct route.	Not if they are required to deviate from direct route.	Not if they are required to deviate from direct route.

**2. Which design option do you believe best delivers the design principles?**

HALE options 1 and 2, and MALE options 1 and 2 are equally viable but potentially impact on many other airspace users if activated during daylight hours. MALE Option 3 has less footprint outside existing controlled airspace so would have reduced impact on other Class G airspace users. MALE Option 4, if BVLOS operations can be integrated into controlled airspace, would best deliver design principles from a GA perspective because it mainly utilises existing controlled airspace.

**3. Do you have any recommendations for the Sponsor or alternative options you would like the sponsor to consider?**

Given the volume of daytime GA traffic in the area, a danger area activated by Notam seems to be the most appropriate airspace classification if any of these airspace volumes are to be activated during daylight hours. For daytime activation a Danger Area Crossing Service with sufficient ATC capacity to cope with likely traffic volumes would be essential for all design options.

**4. Do you have any other feedback for the Sponsor?**

In all design options Area A 6nm radius from surface upwards would have considerable impact on our cross-country gliding operations if activated during daylight hours by restricting route options for Nympsfield gliders to and from the southeast. The MALE options Transit Corridors TC1 and TC2 would also impact on higher altitude gliding flights particularly TC2 which crosses an area in which mountain wave conditions commonly exist and facilitate glider flights up to FL195 (and above where permitted).

The Stage 2A Options Development document states that “all activations will be between 1 hour after sunset and 1 hour before sunrise unless in extremis.” Activation of any of the proposed airspace volumes outside of daylight hours would have no impact on gliding.

## London Oxford Airport

### 1. Do you assess that the presented design options achieve the design principles? (Please elaborate as required)

Design Principle		Option 0	MALE 1	MALE 2	MALE 3	MALE 4	HALE 1	HALE 2
a	Provide a safe environment for airspace users	Yes	Where a minimum amount of Class G airspace is segregated	Where a minimum amount of Class G airspace is segregated	Where a minimum amount of Class G airspace is segregated	Where a minimum amount of Class G airspace is segregated	Where a minimum amount of Class G airspace is segregated	Where a minimum amount of Class G airspace is segregated
b	Provide access to sufficient suitable airspace to enable efficient RPAS transition between the ground and medium/high-level transit routes	Not met	A circular shape of segregated airspace should be sufficient to enable the safe climb (or descent on return) until it links into CAS or a minimum 'tube' of segregated airspace linking from it until the climb into CAS is achieved.	A circular shape of segregated airspace should be sufficient to enable the safe climb (or descent on return) until it links into CAS or a minimum 'tube' of segregated airspace linking from it until the climb into CAS is achieved.	A circular shape of segregated airspace should be sufficient to enable the safe climb (or descent on return) until it links into CAS or a minimum 'tube' of segregated airspace linking from it until the climb into CAS is achieved.	A circular shape of segregated airspace should be sufficient to enable the safe climb (or descent on return) until it links into CAS or a minimum 'tube' of segregated airspace linking from it until the climb into CAS is achieved.	A circular shape of segregated airspace should be sufficient to enable the safe climb (or descent on return) until it links into CAS or a minimum 'tube' of segregated airspace linking from it until the climb into CAS is achieved.	A circular shape of segregated airspace should be sufficient to enable the safe climb (or descent on return) until it links into CAS or a minimum 'tube' of segregated airspace linking from it until the climb into CAS is achieved.
c	Minimise the impact to other airspace users	Yes	Yes, but limit the activation period. Ideally, the	Yes, but limit the activation period. Ideally, the	Yes, but limit the activation period. Ideally, the	Yes, but limit the activation period. Ideally, the	Yes, but Area A top level may be too high? Also limit the	Yes, but limit the activation period. Ideally, the

			HALE/MALE should spiral to climb descend remaining within Area A until established at a level to remain within extant CAS. Additionally, the base level of Area B should be restricted to FL105 or allow coordinated crossing clearances for other aircraft based on standard separation	HALE/MALE should spiral to climb descend remaining within Area A until established at a level to remain within extant CAS. Additionally, the base level of Area B should be restricted to FL105 or allow coordinated crossing clearances for other aircraft based on standard separation	HALE/MALE should spiral to climb descend remaining within Area A until established at a level to remain within extant CAS. Additionally, the base level of Area B should be restricted to FL105 or allow coordinated crossing clearances for other aircraft based on standard separation	HALE/MALE should spiral to climb descend remaining within Area A until established at a level to remain within extant CAS. Additionally, the base level of Area B should be restricted to FL105 or allow coordinated crossing clearances for other aircraft based on standard separation	activation period. Ideally, the HALE/MALE should spiral to climb descend remaining within Area A until established at a level to remain within extant CAS. Additionally, the base level of Area B should be restricted to FL105 or allow coordinated crossing clearances for other aircraft based on standard separation	HALE/MALE should spiral to climb descend remaining within Area A until established at a level to remain within extant CAS. Additionally, the base level of Area B should be restricted to FL105 or allow coordinated crossing clearances for other aircraft based on standard separation
d	Adhere to FUA principles and strategy	N/A	No, the 3-hour window is too large, or the intent not defined. It should be based on smaller segments that have entry and exit times based on +/- 15 minutes	No, the 3-hour window is too large, or the intent not defined. It should be based on smaller segments that have entry and exit times based on +/- 15 minutes	No, the 3-hour window is too large, or the intent not defined. It should be based on smaller segments that have entry and exit times based on +/- 15 minutes	No, the 3-hour window is too large, or the intent not defined. It should be based on smaller segments that have entry and exit times based on +/- 15 minutes	No, the 3-hour window is too large, or the intent not defined. It should be based on smaller segments that have entry and exit times based on +/- 15 minutes	No, the 3-hour window is too large, or the intent not defined. It should be based on smaller segments that have entry and exit times based on +/- 15 minutes
e	Where possible and practicable, accommodate the Airspace Modernisation Strategy	N/A	Unknown	Unknown	Unknown	Unknown	Unknown	Unknown

f	Endeavour to make the airspace as accessible as possible	N/A	No information provided as to whether other users with a clearance or under an ATS can enter/operate within the segregated airspace with coordination	No information provided as to whether other users with a clearance or under an ATS can enter/operate within the segregated airspace with coordination	No information provided as to whether other users with a clearance or under an ATS can enter/operate within the segregated airspace with coordination	No information provided as to whether other users with a clearance or under an ATS can enter/operate within the segregated airspace with coordination	No information provided as to whether other users with a clearance or under an ATS can enter/operate within the segregated airspace with coordination or	No information provided as to whether other users with a clearance or under an ATS can enter/operate within the segregated airspace with coordination or
			or agreement. If such coordination is not possible within segregated airspace, a form of airspace should be provided that provides protection to the HALE/MALE activity and allows coordinated crossings of the airspace to occur to improve effectiveness and efficiency.	or agreement. If such coordination is not possible within segregated airspace, a form of airspace should be provided that provides protection to the HALE/MALE activity and allows coordinated crossings of the airspace to occur to improve effectiveness and efficiency.	or agreement. If such coordination is not possible within segregated airspace, a form of airspace should be provided that provides protection to the HALE/MALE activity and allows coordinated crossings of the airspace to occur to improve effectiveness and efficiency.	or agreement. If such coordination is not possible within segregated airspace, a form of airspace should be provided that provides protection to the HALE/MALE activity and allows coordinated crossings of the airspace to occur to improve effectiveness and efficiency.	agreement. If such coordination is not possible within segregated airspace, a form of airspace should be provided that provides protection to the HALE/MALE activity and allows coordinated crossings of the airspace to occur to improve effectiveness and efficiency.	agreement. If such coordination is not possible within segregated airspace, a form of airspace should be provided that provides protection to the HALE/MALE activity and allows coordinated crossings of the airspace to occur to improve effectiveness and efficiency.
g	Minimise the environmental impact of non-participating aircraft	N/A	Unknown	Unknown	Unknown	Unknown	Unknown	Unknown

**2. Which design option do you believe best delivers the design principles?**

Where segregated airspace is provided and/or HALE/MALE can operate within it, all HALE/MALE Options would be acceptable where some form of coordinated entry/crossing could be provided by the authority providing control within the airspace. Segregated airspace may not be the best option as it would restrict by definition. If once within CAS normal coordination can be provided, equally an airspace construct should be provided that enables normal coordination/separation rules to be applied and this would improve efficiency and effectiveness.

### 3. Do you have any recommendations for the Sponsor or alternative options you would like the sponsor to consider?

A circular shape of segregated airspace should be sufficient to enable the safe climb until it links into CAS or a minimum 'tube' of segregated airspace until the climb into CAS is achieved. Where there is segregated airspace, this should not prevent traffic being coordinated to cross it in accordance with normal coordination and separation rules, we would just need to know who the controlling authority was to obtain the coordination (such coordination would equally be required when the HALE/MALE was transiting through CAS anyway). Where HALE/MALE is authorised to operate within CAS, a priority could be set for the flight to take precedence over other aircraft within CAS and then segregated airspace within CAS and/or above FL195 should not be required.

To maintain the principal of 'Flexible use of Airspace', I recommend considering reducing the period of 3-hours per activation as stated. A 3-hour window appears excessive for a segment of the whole route and should be limited to the period that an aircraft will be within a segment of any agreed segregated airspace to plus/minus 15 minutes from the planned entry and exit times. In all cases, once the aircraft has left a segment, the airspace should be cancelled. If the HALE and/or MALE is authorised to operate under an ATS within CAS, there is no requirement for segregated airspace when flying within CAS or airspace within which a 'controlled' ATS can be provided (i.e. above FL195 outside of the activation periods of MTAs/TRAs) such that standard IFR services can be provided.

If other aircraft can be coordinated to take standard separation from the HALE/MALE, a form of airspace that allows such coordination should be established unless operations through 'Segregated Airspace' with coordination is specifically allowed.

Where a HALE and/or MALE is authorised to fly within CAS (along or across) and/or the aircraft is operating above FL195, and an ATS can be provided (probably by Swanwick Military (78 Sqn) then pre-planned routings as described should not be required as the HALE/MALE should be capable of being treated as normal IFR (i.e. spiral above Fairford into CAS and continue as can be coordinated).

What is the intent for recovery within poor weather or is the envisaged Area A sufficient to contain an instrument-type approach?

### 4. Do you have any other feedback for the Sponsor?

**Comments from Page 3 of the 'Stage 2A Initial Options Engagement Letter':**

**Correction.** Oxford International Airport" should be "London Oxford Airport"

**"At night, however, aviation activity outside of controlled airspace declines to close to zero"**. Please define night. London Oxford Airport operates daily from 06:30 to 22:30 local (can open at 06:00 and/or remain open until midnight) and has traffic every evening after official night unless the weather is below limits. Traffic during the evening is normally IFR Inbounds and Outbounds but can be flying training and VFR circuit work.



## RAF Benson

### 1. Do you assess that the presented design options achieve the design principles? (Please elaborate as required)

Design Principle		Option 0	MALE 1	MALE 2	MALE 3	MALE 4	HALE 1	HALE 2
a	Provide a safe environment for airspace users	Yes	Yes	Yes	Yes	Yes	Yes	Yes
b	Provide access to sufficient suitable airspace to enable efficient RPAS transition between the ground and medium/high-level transit routes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
c	Minimise the impact to other airspace users	Yes	Yes	Yes	Yes	Yes	Yes	Yes
d	Adhere to FUA principles and strategy	Yes	Yes	Yes	Yes	Yes	Yes	Yes
e	Where possible and practicable, accommodate the Airspace Modernisation Strategy	Yes	Yes	Yes	Yes	Yes	Yes	Yes
f	Endeavour to make the airspace as accessible as possible	Yes	Yes	Yes	Yes	Yes	Yes	Yes
g	Minimise the environmental impact of non-participating aircraft	Yes	Yes	Yes	Yes	Yes	Yes	Yes

### 2. Which design option do you believe best delivers the design principles?

From an RAF Benson perspective we feel that all options will provide an adequate solution and will not adversely affect SH operations.

**3. Do you have any recommendations for the Sponsor or alternative options you would like the sponsor to consider?**

Nil.

**4. Do you have any other feedback for the Sponsor?**

This submission is from all airspace users at RAF Benson. From an ATC perspective the airspace will not affect our task. From the Sqns, the only airspace likely to affect SH Ops is the 6nm ATZ around Fairford whilst the UAV launches / recovers. As this only just protrudes beyond the current Class D of BZN we don't think it would have an impact on SH Ops, if a Brize Low Level crossing service (Farringdon to North Leach) is available when a UAV is getting airborne and a crossing west of the CTR is required. The only other piece of proposed airspace that might affect SH Ops is at FL70 heading NW from Fairford. This would not hinder any training, is well above SA so wouldn't be a factor in an emergency and is sandwiched between two bits of Class A airspace, so should not be an issue. Given that the proposed airspace will mainly be active at night, the effects should be mitigated to an extent but worth consideration. For FW AS based at Benson, the proposal in its current state will not affect Ops. If the airspace were to then extend or move east then it may have an effect on Ops.

RAF Brize Norton

1. Do you assess that the presented design options achieve the design principles? (Please elaborate as required)

Design Principle		Option 0	MALE 1	MALE 2	MALE 3	MALE 4	HALE 1	HALE 2
a	Provide a safe environment for airspace users	No – in the absence of DAA capability on subject RPA, CAP722 would be contravened.	Yes – the preferred option to designate the airspace a Danger Area will achieve this design principle.	Yes - see MALE 1 Design Principle a.	Yes - see MALE 1 Design Principle a.	Unknown – the Sponsor currently investigates whether a viable option in the absence of DAA capability.	Yes - see MALE 1 Design Principle a.	Yes - see MALE 1 Design Principle a.
b	Provide access to sufficient suitable airspace to enable efficient RPAS transition between the ground and medium/high-level transit routes	No – in the absence of DAA capability.	Yes.	Yes.	Yes.	Unknown – see MALE 4 Design Principle a.	Yes – note segment A is provides more airspace than HALE 2 equivalent. This may create a marginal benefit in tactical management of the airspace.	Yes.
c	Minimise the impact to other airspace users	Yes - status quo maintained.	Segment A will obstruct BZN RW25 & 07 inbounds, RW25 departures, and to a lesser extent, westerly Zone routings. Segment B/TC1 will obstruct departure profiles to Daventry, Niton, and Litchfield, and to a lesser extent,	See MALE 1 Design Principle c.	See MALE 1 Design Principle c.	The least restrictive MALE option in the absence of TC1/B segment.  Segment A will obstruct BZN RW25 & 07 inbounds, RW25 departures, and to a lesser extent, westerly Zone routings.	See MALE 1 Design Principle c.	See MALE 1 Design Principle c.

			the Director pattern.  The mitigatory measures of airspace being activated 24 hours in advance by NOTAM, and only during night are noted.			The mitigatory measures of airspace being activated 24 hours in advance by NOTAM, and only during night are noted.		
<b>d</b>	Adhere to FUA principles and strategy	Yes – status quo maintained.	Yes.	Yes.	Yes.	Yes.	Yes.	Yes.
<b>e</b>	Where possible and practicable, accommodate the Airspace Modernisation Strategy	No - appropriate airspace not provided for defence requirements.	Yes – CAP1711 1.9 & 1.15 'ensuring defence requirements are facilitated through access to appropriate airspace'. Priority vs BZN assets/tasking to be established to ensure not to the detriment.	Yes - see MALE 1 Design Principle e.	Yes - see MALE 1 Design Principle e.	Unknown – see MALE 4 Design Principle e.	Yes - see MALE 1 Design Principle e.	Yes - see MALE 1 Design Principle e.
<b>f</b>	Endeavour to make the airspace as accessible as possible	Yes – status quo maintained.	Yes – preferred option of Danger Area is less restrictive than controlled airspace. A crossing clearance can be provided by BZN ATC, and segments will be	Yes - see MALE 1 Design Principle f.	Yes - see MALE 1 Design Principle f.	Yes - see MALE 1 Design Principle f.	Yes - see MALE 1 Design Principle f.	Yes - see MALE 1 Design Principle f.

			collapsed once no longer in use.					
<b>g</b>	Minimise the environmental impact of non-participating aircraft	Yes – status quo maintained.	In the potential absence of a crossing clearance, aircraft may require transit of a less expeditious route or to enter a holding pattern.	Yes - see MALE 1 Design Principle g.	Yes - see MALE 1 Design Principle g.	The MALE option of the least environmental impact in the absence of B/TC1 segment. Holding patterns may still be necessary.	Yes - see MALE 1 Design Principle g.	Yes - see MALE 1 Design Principle g.

**2. Which design option do you believe best delivers the design principles?**

The design principles have been considered in the context of BZN ATC AOR, of which segments A and B/TC1 will affect.

MALE options, 1, 2, and 3 are considered to have delivered the design principles to an equal standard. The unknown elements of MALE 4 (design principles a, b, and e) deem this option unsuitable, however, if the Sponsor's enquiries into this option reveals it to be viable and meet the 'unknown' stated design principles, MALE 4 would be considered to have best delivered.

MALE 2 is considered to have best delivered the design principles due to the marginal potential benefits of design principle b.

**3. Do you have any recommendations for the Sponsor or alternative options you would like the sponsor to consider?**

We wish the Sponsor to provide the conclusion of their enquiries regarding MALE 4 in due course.

**4. Do you have any other feedback for the Sponsor?**

The MALE/HALE options presented will impact BZN operations similarly, as detailed in design principle c. The mitigatory measures presented and alternative options available at a tactical level to reduce this impact are acknowledged, however an area of concern if these options cannot be utilised, i.e. providing a crossing clearance or departing from the opposite runway, is that BZN assets of an operational priority could be unable to get airborne or land in a worst case scenario.

This considered, the following confirmations are requested:

- The duration of time for specific segments A, B, and TC1 are likely to be active for before collapse for inbound/outbound RPA.
- The approximate notification time for RPA to reach their point of descent and whether this can be delayed.
- The approximate RPA descent rate/time for MALE/HALE options.
- Details of the consequences for a break-off to an RPA continuous descent.
- That Brize Norton ATC will be the controlling authority for the specified airspace within their AOR.
- Proposed actions in the event of RPA asset suffering an emergency and requiring recovery outside of the time parameters detailed in a prior NOTAM.

The order of priority for EGVA based RPA assets vs BZN based assets should be determined between Sponsor and Stakeholder following confirmation of the above. We share the preference of the Sponsor that the proposed airspace should be designated a Danger Area.

## RAF Little Rissington

### 1. Do you assess that the presented design options achieve the design principles? (Please elaborate as required)

Design Principle		Option 0	MALE 1	MALE 2	MALE 3	MALE 4	HALE 1	HALE 2
a	Provide a safe environment for airspace users	Y	Y	Y	Y	Y	Y	Y
b	Provide access to sufficient suitable airspace to enable efficient RPAS transition between the ground and medium/high-level transit routes	N	Y	Y	Y	Y	Y	Y
c	Minimise the impact to other airspace users	Y	Y	Y	Y	Y	Y	Y
d	Adhere to FUA principles and strategy	N	Y	Y	Y	Y	Y	Y
e	Where possible and practicable, accommodate the Airspace Modernisation Strategy	N	Y	Y	Y	Y	Y	Y
f	Endeavour to make the airspace as accessible as possible	Y	Y	Y	Y	Y	Y	Y
g	Minimise the environmental impact of non-participating aircraft	Y	Y	Y	Y	Y	Y	Y

**2. Which design option do you believe best delivers the design principles?**

**HALE 1 and MALE 3**

**3. Do you have any recommendations for the Sponsor or alternative options you would like the sponsor to consider?**

**No**

**4. Do you have any other feedback for the Sponsor?**

**No**



## Wiltshire Air Ambulance

### 1. Do you assess that the presented design options achieve the design principles? (Please elaborate as required)

Design Principle		Option 0	MALE 1	MALE 2	MALE 3	MALE 4	HALE 1	HALE 2
<b>a</b>	Provide a safe environment for airspace users	Yes	Yes	Yes	Yes	Yes	Yes	Yes
<b>b</b>	Provide access to sufficient suitable airspace to enable efficient RPAS transition between the ground and medium/high-level transit routes	No	Yes	Yes	Yes	Yes	Yes	Yes
<b>c</b>	Minimise the impact to other airspace users	Yes	Yes	Yes	Yes	Yes	Yes	Yes
<b>d</b>	Adhere to FUA principles and strategy	No	Yes	Yes	Yes	Yes	Yes	Yes
<b>e</b>	Where possible and practicable, accommodate the Airspace Modernisation Strategy	No	Yes	Yes	Yes	Yes	Yes	Yes
<b>f</b>	Endeavour to make the airspace as accessible as possible	Yes	Yes	Yes	Yes	Yes	Yes	Yes
<b>g</b>	Minimise the environmental impact of non-participating aircraft	Yes	Yes	Yes	Yes	Yes	Yes	Yes

**2. Which design option do you believe best delivers the design principles?**

**MALE Option 4**

**3. Do you have any recommendations for the Sponsor or alternative options you would like the sponsor to consider?**

**Nil**

**4. Do you have any other feedback for the Sponsor?**

**As a HEMS unit that regularly transits the RAF FAIRFORD MATZ/ATZ, we would like to be involved in the consultation on the procedures for crossing the proposed Segment A airspace (SFC to FL95 or FL150).**

## **Stakeholder Feedback Emails**

### **Bristol and Gloucestershire Gliding Club**

**From:** DAATM-AirspaceConsultation (MULTIUSER)  
**Sent:** 01 June 2022 13:45  
**To:** [REDACTED]  
**Subject:** RE: Fairford Stage 2A Response

[REDACTED],

Thank you for taking the time to provide comprehensive feedback, which will definitely help us to better understand the baseline of gliding operations in the region.

Kind regards,

[REDACTED]

[REDACTED] | [REDACTED] | SO2 Airspace Strategy | Defence Airspace and Air Traffic Management | Aviation House | 1E Beehive  
Ringroad Crawley West Sussex RH6 0YR | [REDACTED]

**From:** [REDACTED]  
**Sent:** 01 June 2022 12:13  
**To:** DAATM-AirspaceConsultation (MULTIUSER) <[DAATM-AirspaceConsultation@mod.gov.uk](mailto:DAATM-AirspaceConsultation@mod.gov.uk)>  
**Subject:** Fairford Stage 2A Response

Dear Sir / Madam

Please find attached the Fairford Stage 2A response form from Bristol & Gloucestershire Gliding Club.

Kind regards

[REDACTED]  
Airspace Representative  
Bristol & Gloucestershire Gliding Club.

## British Gliding Association (BGA)

**From:** [REDACTED]  
**Sent:** 08 June 2022 13:23  
**To:** [REDACTED] (DAATM-Airspace Strategy SO2)  
**Subject:** Fairford TDA ACP

Hi [REDACTED]  
Good to talk earlier.

[REDACTED] (a volunteer member of the BGA airspace committee) is happy to be contacted by your colleague to arrange a meeting re the detail of gliding needs in the airspace as described. [REDACTED] is away next week but will monitor email.

[REDACTED]  
Kind regards  
[REDACTED]

[REDACTED]  
Chief Executive Officer

British Gliding Association  
8 Merus Court  
Meridian Business Park  
Leicester LE19 1RJ

T 0044 (0)116 2892956 M 07749 908444  
[www.gliding.co.uk](http://www.gliding.co.uk)



Registered in England 422605

### [Womens World Gliding Championship 2022](#)

13<sup>th</sup>-27<sup>th</sup> August at The Gliding Centre, Husbands Bosworth, Leicestershire

**From:** [REDACTED]  
**Sent:** 01 June 2022 14:45  
**To:** [REDACTED] (DAATM-Airspace Strategy SO2)  
**Subject:** RE: ACP-2021-078 RAF Fairford RPAS Operations - Initial Options Engagement

[REDACTED]  
Wed 8th @ 1300 will work fine, thanks.  
Thanks  
[REDACTED]

**From:** [REDACTED] (DAATM-Airspace Strategy SO2) [REDACTED]  
**Sent:** 01 June 2022 14:24  
**To:** [REDACTED]  
**Subject:** RE: ACP-2021-078 RAF Fairford RPAS Operations - Initial Options Engagement

Hi [REDACTED]

Thanks for your feedback so far and apologies for taking my time to reply. Is it possible to have a chat over Teams next week to discuss your questions and also the gliding ops above FL100?

I can be available during the following windows if any of the times work for you?

Mon 6<sup>th</sup> – 1500-1700

Tue 7<sup>th</sup> – 0900-1030

Tue 7<sup>th</sup> – 1300-1600

Wed 8<sup>th</sup> – 1030-1200

Wed 8<sup>th</sup> – 1300-1600

Enjoy the bank holiday weekend and I look forward to maintaining this dialogue through the ACP process. Kind

regards,

[REDACTED]

[REDACTED] | SO2 Airspace Strategy | Defence Airspace and Air Traffic Management | Aviation House | 1E Beehive  
Ringroad Crawley West Sussex RH6 0YR | [REDACTED]

[k](#)

**From:** [REDACTED]

**Sent:** 16 May 2022 09:50

**To:** DAATM-AirspaceConsultation (MULTIUSER) <[DAATM-AirspaceConsultation@mod.gov.uk](mailto:DAATM-AirspaceConsultation@mod.gov.uk)>

**Subject:** RE: ACP-2021-078 RAF Fairford RPAS Operations - Initial Options Engagement

[REDACTED]

Thanks for the engagement.

The options make sense. However we make two points and have associated questions.

1. Whilst MALE4 with integration into existing high level CAS is clearly the better option for all, the radius of the cylinder overhead Fairford used for all options appears to be excessive. It's not clear why 6nm radius is required in this case. Why is 5nm not acceptable? Is this due to USAF air traffic procedures?
2. The options that cross mid Wales, eg MALE 1, will have an impact on gliding above FL100. This may be manageable with flexible use airspace. What does the sponsor have in mind to ensure DPd is adhered to?

Kind regards

[REDACTED]

BGA

## British Microlight Aircraft Association (BMAA)

**From:** [REDACTED] (DAATM-Airspace Strategy SO2)  
**Sent:** 06 June 2022 16:52  
**To:** [REDACTED]  
**Cc:** [REDACTED]; 'BMAA Airspace'  
**Subject:** RE: ACP-2021-078 RAF Fairford RPAS Operations - Initial Options Engagement

[REDACTED],

Thank you for taking the time to provide such comprehensive feedback on behalf of the BMAA and I note that, based on the planned activity times, there will not be an impact on your members' operations. I am compiling a feedback document and will include response comments to all feedback there, but below are some comments that should help clarify some points:

2. The intent is to provide more accurate diagrams of the proposed options that are taken forward to Stage 3's consultation. This may be better facilitated by splitting a given option over several images rather than trying to convey the entire option on one image, though at this stage it was considered suitable.
3. The ACP team has been working closely with the RPAS operators to ensure they understand that only the dimensions of airspace required to contain their procedures should be proposed for segregation. Due to classification, procedures documentation will not be included in our engagement material, but it can be shared with the CAA should it be required as evidence.

7/8. Both provision of DACS and activation by NOTAM are expected.

Kind regards,

[REDACTED] | SO2 Airspace Strategy | Defence Airspace and Air Traffic Management | Aviation House | 1E  
Beehive Ringroad Crawley West Sussex RH6 0YR | [REDACTED]

**From:** [REDACTED]  
**Sent:** 01 June 2022 21:40  
**To:** DAATM-AirspaceConsultation (MULTIUSER) <[DAATM-AirspaceConsultation@mod.gov.uk](mailto:DAATM-AirspaceConsultation@mod.gov.uk)>  
**Cc:** [REDACTED] 'BMAA Airspace' <[bmaa.airspace@gmail.com](mailto:bmaa.airspace@gmail.com)>  
**Subject:** RE: ACP-2021-078 RAF Fairford RPAS Operations - Initial Options Engagement


Dear [REDACTED]

I would like to respond to your current engagement – Initial Design Options – for this ACP on behalf of the British Microlight Aircraft Association (BMAA).

1. The only area of proposed segregated airspace that could potentially have any impact on our members is segment A.
2. We feel that the airspace charts depicted in the Stage 2A – Option Development document should be decluttered in relation to illustration for Segment A.

3. You have stated that the required size of Segment A is 6nm radius. That is 12nm diameter. The current RAF Fairford ATZ is 5nm diameter. So the required size of Segment A is 7nm diameter larger, i.e. 3.5nm radius larger. We would just question why an RPA requires such a larger volume than a manned aircraft.
4. HALE Option 1 provides for Segment A to be from surface to FL150. The remaining Options provide for Segment A to be from surface to FL95, based on the RPA being able to enter controlled airspace within that altitude.
5. For our members requirements even the upper level of FL95 would mean the whole volume of airspace would be unusable.
6. On the basis that the proposed airspace would only ever be activated from 1 hour after sunset to 1 hour before sunrise and at other times the volume outside of the Fairford ATZ would revert to Class G there would be no impact on our members' operations.
7. However, we would expect that a DACS be a condition for approval so that pilots could request confirmation of activity.
8. We would suggest Flexible Use Airspace as a Danger Area activated by NOTAM. As such MALE Option 4 would seem to be the preferred solution.
9. We believe the Initial Design Options presented align with the Design Principles and address the Statement of Need.

Regards

  
BMAA Airspace Team lead

## Environment Agency

**From:** Enquiries, Unit <[enquiries@environment-agency.gov.uk](mailto:enquiries@environment-agency.gov.uk)>  
**Sent:** 11 May 2022 15:38  
**To:** DAATM-AirspaceConsultation (MULTIUSER)  
**Subject:** FW: 220511/AC40 ACP-2021-078 RAF Fairford RPAS Operations - Initial Options Engagement  
**Attachments:** Stage 2A Initial Options Engagement Letter.pdf; 2A Feedback Form.docx

Dear [REDACTED]

I have passed your e-mail to the local customer team who will deal with your request.

The Freedom of Information Act and Environmental Information Regulations state that a public authority must respond to requests for information within 20 working days.

You can find more information about our service commitment by clicking on the link below:

<https://www.gov.uk/government/publications/environment-agency-customer-service-commitment>

You can contact our customer team directly on the contact details below, or call the National Customer Contact Centre on 03708 506506 who will transfer you to the area team.

Please quote your enquiry reference 220511/AC40 in any correspondence with us regarding this [matter](#).

[Enquiries\\_THM@environment-agency.gov.uk](mailto:Enquiries_THM@environment-agency.gov.uk)

Customers and Engagement  
Environment Agency  
Thames Area  
Redkite House  
Howbery Park  
WALLINGFORD  
OX10 8BD

Kind regards,

[REDACTED]  
Customer Contact Centre  
Environment Agency

[REDACTED]  
: Web Site: [www.gov.uk/environment-agency](http://www.gov.uk/environment-agency)

Click an icon to keep in touch with us:-



## Gloucestershire County Council

**From:** [REDACTED] Sqn Ldr (DAATM-Airspace Strategy SO2)  
**Sent:** 19 May 2022 13:11  
**To:** [REDACTED]  
**Subject:** RE: ACP-2021-078 RAF Fairford RPAS Operations - Initial Options Engagement

Good afternoon [REDACTED]

Thank you for your response. I will replace the broader general email addresses with jus you as the poc for future engagement and the formal consultation later this year.

Kind regards,

[REDACTED]

[REDACTED] | Sqn Ldr | SO2 Airspace Strategy | Defence Airspace and Air Traffic Management | Aviation House | 1E  
Beehive Ringroad Crawley West Sussex RH6 0YR | [REDACTED]

**From:** [REDACTED]  
**Sent:** 16 May 2022 17:09  
**To:** DAATM-AirspaceConsultation (MULTIUSER) <[DAATM-AirspaceConsultation@mod.gov.uk](mailto:DAATM-AirspaceConsultation@mod.gov.uk)>  
**Subject:** FW: ACP-2021-078 RAF Fairford RPAS Operations - Initial Options Engagement

Hello [REDACTED]

Thank you for consulting Gloucestershire County Council (GCC) on this matter. I can confirm that I have no officer comments to make.

Can you put me down as the GCC contact for future consultations please?

Many thanks

[REDACTED]  
Senior Planning Officer

## London Oxford Airport

**From:** [REDACTED]  
**Sent:** 01 June 2022 14:32  
**To:** [REDACTED] Sqn Ldr (DAATM-Airspace Strategy SO2)  
**Cc:** ATC Sup  
**Subject:** FW: ACP-2021-078 RAF Fairford RPAS Operations - Initial Options Engagement

Afternoon, [REDACTED],

Best for me would be Tue 7<sup>th</sup> – 1300-1600

Kind Regards,

[REDACTED]

HATS  
Oxford Aviation Services Limited  
London Oxford Airport  
Langford Lane  
Kidlington  
OXON  
OX5 1RA

Tel: [REDACTED]

[REDACTED]  
[Email: dausten@londonoxfordairport.com](mailto:dausten@londonoxfordairport.com)  
[www.londonoxfordairport.co.uk](http://www.londonoxfordairport.co.uk)

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**From:** [REDACTED] Sqn Ldr (DAATM-Airspace Strategy SO2) [REDACTED] >  
**Sent:** 01 June 2022 14:22  
**To:** [REDACTED]  
[REDACTED] Initial Options Engagement

**EXTERNAL**

Hi [REDACTED],

Is it possible to have a short chat on Teams next week so that I can ask a few questions about Oxford traffic to help shape the airspace baseline please? We've had discussion with NATS (minutes will be uploaded as part of our engagement doc in due course), but obviously we are cognisant of the Western Airspace Deployment in the spring and changes in the vicinity as part of that project, and also about the impracticalities of DACS to network traffic/flight planning systems, but it would be helpful to understand where your traffic joins/departs CAS and if it would be able to accept DACS.

I can be available during any of the following periods if there's a time that would work for you?

Mon 6<sup>th</sup> – 1500-1700

Tue 7<sup>th</sup> – 0900-1030

Tue 7<sup>th</sup> – 1300-1600

Wed 8<sup>th</sup> – 1030-1200

Wed 8<sup>th</sup> – 1300-1600

Enjoy the bank holiday (hopefully you're getting some time off)!

Kind regards,

[REDACTED]

[REDACTED] Sqn Ldr | SO2 Airspace Strategy | Defence Airspace and Air Traffic Management | Aviation House | 1E  
Beehive Ringroad Crawley West Sussex RH6 0YR | [REDACTED]

From: [REDACTED] >

Sent: 19 May 2022 13:44

To: [REDACTED] Sqn Ldr (DAATM-Airspace Strategy SO2) [REDACTED] >

Subject: RE: ACP-2021-078 RAF Fairford RPAS Operations - Initial Options Engagement

Hi [REDACTED]

Here to help

If the night traffic was derived only within 6NM of Fairford then that should not be a problem to Oxford, we were looking more to the transit corridor northbound which is regularly used – but not enough to see more than a few times a month. As long as the Fairford circle to the base of or into CAS does not block a route in/out of CAS from a reporting point – or NATS offers another route, then all is good.

I fully understand the FUA and airspace rules that make interaction between different tasks difficult – looks as though nothing has changed since I left!! The routing through or along CAS will be complex for NATS if coordination is not possible and three hour 'windows' are required .....

Hope everything else is going well?

Take care

Kind Regards,

[REDACTED]

HATS  
Oxford Aviation Services Limited  
London Oxford Airport  
Langford Lane  
Kidlington  
OXON  
OX5 1RA

Tel: [REDACTED]

[Email: dausten@londonoxfordairport.com](mailto:dausten@londonoxfordairport.com)  
[www.londonoxfordairport.co.uk](http://www.londonoxfordairport.co.uk)

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From: [REDACTED] Sqn Ldr (DAATM-Airspace Strategy SO2) [REDACTED] >

Sent: 19 May 2022 13:36

To: [REDACTED]

Subject: RE: ACP-2021-078 RAF Fairford RPAS Operations - Initial Options Engagement

**EXTERNAL**

Good afternoon [REDACTED],

Thank you for your thorough feedback and apologies for incorrectly naming the airport.

We are still working with 78 Sqn, NATS and the CAA to try to understand whether/how it might be acceptable for certified RPAS without ACAS to fly inside CAS (class A-C and D/TMZ) as per a standard, manned aircraft without ACAS, without the need for segregated areas. Until that potential option is proved viable and more mature, we will need to continue to plan for segregation.

Your suggestion of increased segmentation to facilitate quicker 'hand back' is something we can explore further, though was perhaps initially considered too complex having seen that feedback in other ACPs. Provision of DACS by Brize ATC and 78 Sqn is still the intent, though we are cognisant that some aircraft may not want or be permitted to accept transit through a DA.

For the purpose of the engagement letter, 'night' was used generically, but the team have been working on activation being during the period 1hr after sunset to 1hr before sunrise. There will be more explanation of the data gathering in the Stage 2B submission (options appraisal) as it requires us to clearly outline a baseline (do nothing

option), but during the week used for data gathering there was only one aircraft seen to transit through the airspace within 6NM of Fairford that would have potentially been affected by DA if unable to call for a crossing service, or if timings conflicted with the actual RPAS climb/descent. If LOA traffic does routinely fly through the proposed airspace, it might be helpful to have a Teams meeting to discuss and factor that into the baseline?

Kind regards,

[REDACTED]

[REDACTED] Sqn Ldr | SO2 Airspace Strategy | Defence Airspace and Air Traffic Management | Aviation House | 1E  
Beehive Ringroad Crawley West Sussex RH6 0YR [REDACTED]  
[REDACTED]

**From:** [REDACTED]  
**Sent:** 18 May 2022 09:54  
**To:** DAATM-AirspaceConsultation (MULTIUSER) <[DAATM-AirspaceConsultation@mod.gov.uk](mailto:DAATM-AirspaceConsultation@mod.gov.uk)>  
**Subject:** RE: ACP-2021-078 RAF Fairford RPAS Operations - Initial Options Engagement

Dear DAATM,

Attached is the London Oxford Airport response to the initial options engagement regarding RAF Fairford proposed RPAS operations.

Please contact me if you have any questions.

Kind Regards,

[REDACTED]

HATS  
Oxford Aviation Services Limited  
London Oxford Airport  
Langford Lane  
Kidlington  
OXON  
OX5 1RA

[REDACTED]

[REDACTED]  
[Email: dausten@londonoxfordairport.com](mailto:dausten@londonoxfordairport.com)  
[www.londonoxfordairport.co.uk](http://www.londonoxfordairport.co.uk)

## MOD

**From:** [REDACTED] Wg Cdr (22Gp-DFT BM SO1)  
**Sent:** 26 May 2022 11:31  
**To:** [REDACTED] Sqn Ldr (DAATM-Airspace Strategy SO2)  
**Subject:** RE: ACP-2021-078 RAF Fairford RPAS Operations - Initial Options Engagement

[REDACTED],

I've canvassed 22Gp for feedback and the majority of airspace users expect no impact. The limited caveats are outlined below – if you need anything more please give me a shout.

45 Sqn (3FTS): From a 45 perspective, assuming activations are as per below, this would have negligible impact. Any Phenom pulling up from LL and seeking the DTY corridor home would be doing so prior to sunset due to last LL times being prior to this.

Airspace Utilisation As previously stated, the main working assumptions for this ACP are that the proposed airspace is expected be activated approximately 2-3 times per week for approximately 3 hours per activation. However, the change sponsor is exploring activation periods that exceed these assumptions, both in frequency and time periods of utilisation with the availability of crossing service. In an effort to have as little impact as possible on other airspace users, all activations will be between 1 hour after sunset and 1 hour before sunrise unless in extremis, which would be subject to case-by-case approval by the CAA. Each activation would be subject to a NOTAM at least 24 hours in advance.

Valley / 4FTS:

- HALE Option 1 – Nil effect on RAF Valley routine ops. Non-routine flights would be able to accommodate as per other airspace / DAs.
- HALE Option 2 – As above.
- MALE Option 1 – The western portion of corridor TC 2 would have a minor effect on our utilisation of the southern VATAs but we should be able to adjust accordingly without loss of productivity.
- MALE Option 2 – The western portion of corridor TC 2, 201, TC 3 and the western (oversea) portion of TC 4 would affect our ops and productivity if activated within 08-1730Z on weekdays – this is our least favourite proposed solution.
- MALE Option 3 – Nil effect on RAF Valley routine ops. Non-routine flights would be able to accommodate as per other airspace / DAs. This is our favoured solution.
- MALE Option 4 - Nil effect on RAF Valley routine ops. Non-routine flights would be able to accommodate as per other airspace / DAs.

Kind Regards,

[REDACTED]

**Wg Cdr** [REDACTED] MSc MSc MPhys RAF | SO1 Battlespace Management | Directorate of Flying Training | No 22 Group | Building 1300 | MOD Abbey Wood | Bristol | BS34 8YU | [REDACTED]

[REDACTED]

**From:** [REDACTED] w Sqn Ldr (Air-1GP-Coord SO2)  
**Sent:** 06 June 2022 11:36  
**To:** [REDACTED] Sqn Ldr (DAATM-Airspace Strategy SO2)  
**Cc:** Air-1Gp-Coord (MULTIUSER)  
**Subject:** 20220606-RAF Fairford RPAS Operations Airspace Proposals

[REDACTED],

Please see the completed task outlined below for the Airspace Proposals for RAF Fairford. This has been reviewed by the ISTAR Force and the ASWC. No comments were made on the proposals.

Regards,

[Task No 882 - RAF Fairford RPAS Operations Airspace Proposals](#)

[REDACTED]

[REDACTED] | Air-1Gp-SO2 Coord | HQ No 1 Gp | RAF High Wycombe | Bucks | HP14 4UE [REDACTED]  
[REDACTED]  
[REDACTED]

Please address all formal tasking and RFI into HQ 1 Gp via the following [email: Air-1Gp-Coord@mod.gov.uk](mailto:Air-1Gp-Coord@mod.gov.uk) or via the request form located at the following link: [1Gp Coord Cell](#)

**From:** [REDACTED] Flt Lt (19SQN-Assurance-OC)  
**Sent:** 23 May 2022 09:18  
**To:** [REDACTED] Sqn Ldr (DAATM-Airspace Strategy SO2)  
**Subject:** RE: ACP-2021-078 RAF Fairford RPAS Operations - Initial Options Engagement

Morning Ma'am,

There is no impact to ASACS with this. As with all these Danger areas as long as they are notified we will input them into our system and they don't impact our routine Ops. If you need me to complete the feedback form then let me know.

*Warmest Regards,*

[REDACTED]

[REDACTED] | Flight Lieutenant | OC Assurance | 19 Sqn | RAF Boulmer, Longhoughton, Alnwick, Northumberland, NE66 3JF [REDACTED]

## NATS

**From:** [REDACTED] Sqn Ldr (DAATM-Airspace Strategy SO2)  
**Sent:** 10 June 2022 13:58  
**To:** [REDACTED]  
**Subject:** FW: ACP-2021-078 RAF Fairford RPAS Operations - Initial Options Engagement

Hi [REDACTED]

A follow up to your questions posed in the feedback document:

### *Equipage:*

What is the Navigation performance specification of the platforms? This would dictate the amount of segregated airspace required (assumed) and allow assessment of the potential to accommodate rather than segregate.

Request have been sent to RQ-4 and MQ-9 operators to provide equipage details as requested. I will pass them on once received.

### *Flight status:*

NATS assumes this will be OAT with provision of service undertaken by 78 Sqn. Could MOD please confirm so that operational procedures can be agreed?

Yes, the intent is for all RPA to transit as OAT under control of 78 Sqn.

### *Use of alternative solutions:*

Any solution which is based on the implementation of long volumes of segregated airspace, with attendant impact on flight planning, will cause some level of disruption to scheduled air traffic. NATS welcomes the discussions with MOD about how such disruption can be minimised or, ideally, avoided in the future.

The ACP team welcomes discussion with both NATS and the CAA to understand how BVLOS RPAS operations can be safely integrated or how segregation can be achieved without such a significant impact on scheduled air traffic.

Kind regards,

[REDACTED]

[REDACTED] | Sqn Ldr | SO2 Airspace Strategy | Defence Airspace and Air Traffic Management |  
Aviation House | 1E Beehive Ringroad Crawley West Sussex RH6 0YR | [REDACTED]

**From:** [REDACTED] Sqn Ldr (DAATM-Airspace Strategy SO2)  
**Sent:** 06 June 2022 16:52  
**To:** [REDACTED]  
**Subject:** RE: ACP-2021-078 RAF Fairford RPAS Operations - Initial Options Engagement

Hi [REDACTED]



Thank you for providing feedback on behalf of NATS. The team really values your input and I'm sure there will be much more engagement still to come during the ACP process.

Kind regards,

[REDACTED]

[REDACTED] | Sqn Ldr | SO2 Airspace Strategy | Defence Airspace and Air Traffic Management |  
Aviation House | 1E Beehive Ringroad Crawley West Sussex RH6 0YR | [REDACTED]

**From:** [REDACTED] >

**Sent:** 01 June 2022 17:39

**To:** DAATM-AirspaceConsultation (MULTIUSER) <[DAATM-AirspaceConsultation@mod.gov.uk](mailto:DAATM-AirspaceConsultation@mod.gov.uk)>

**Subject:** RE: ACP-2021-078 RAF Fairford RPAS Operations - Initial Options Engagement

Dear [REDACTED]

Thank you again for the discussion last week.

Please find attached NATS thoughts.

Kind Regards

[REDACTED]

**NATS**

[REDACTED]  
Manager, ATM Portfolio - Design & Benefits

[REDACTED]

## **NATS Comments on Stage 2A of ACP-2021-078:** “Enabling Remotely Piloted Aircraft System Operations from RAF Fairford”

### **Comments relating to the implementation of the Design Principles:**

*a. Provide a safe environment for airspace users;*

Whilst segregation provides a safe environment for the RPAS to operate, it does this by removing the ability for other airspace users to flight plan or access the airspace for the period activation. This could introduce unsafe scenarios to other airspace users through bottle necking of aircraft both outside of CAS and within by forcing flight planning congestion and demand through other areas.

MOD states that a crossing service and tactical access would be provided, however, this would not mitigate the impact to airspace users (GAT) and ANSP in CAS and the En-Route environment (the network traffic) as they would not be able to flight plan into/across the airspace in the first instance.

NATS assumes that the proposed provision of tactical access would therefore be provided through ATC interventions and tactical re-routes. This adds unplanned complexity to the ATM operation and has the potential to introduce safety risks through on-loading of ATC sectors and unplanned demand downstream and at destinations. There are further considerations then to be made as to the environmental impact of any necessary holding at aircraft destination.

It should be noted that, although this is an airspace change, there is significant work to complete operational safety assessments of RPAS flights from Fairford. NATS needs to understand and develop procedures for unusual and emergency circumstances such as Lost Link, and will need MOD’s input to this.

*b. Provide access to sufficient suitable airspace to enable efficient RPAS transition between the ground and medium/high-level transit routes;*

This is an RPAS operator requirement, no comment.

*c. Minimise the impact to other airspace users;*

MOD states “The aspiration remains that, with developments in technology and a better understanding of RPAS operations within the UK, BVLOS activity from RAF Fairford can eventually be integrated into all classes of airspace”. It would be useful for NATS to understand any timelines around this ambition and any plans for integration given the ongoing work across stakeholder communities looking at RPAS integration.

Related to this, is the lack of suitable and accepted DAA capability a permanent limitation; or is there an intent to equip the platforms to allow integration in UK Airspace and meet the relevant regulatory requirements?

*d. Adhere to FUA principles and strategy;*

The use of current danger areas as part of the transit routes does not adhere to the FUA principles and strategy which requires the minimum airspace to be segregated to achieve the requirement. The activation of larger than needed SUA volumes to allow a transit to another ‘corridor’ has significant knock-on impact on airspace availability to key flows of traffic even in the hours of darkness.

Consideration must be given to the statement around hours of darkness. In the UK winter, hours of darkness between dawn and dusk conflict directly with peak traffic demand. Clarity is requested on this and assurance that operations can be flexible where required to ensure that network traffic (GAT) and airport operations can continue unhindered during these peak times.

NATS believes MOD will also need to give consideration to high seas notification of activation of danger areas.

*e. Where possible and practicable, accommodate the Airspace Modernisation Strategy;*

What frequency of operations are expected? At this stage, it is perhaps easier to focus on accommodation without segregation for the potentially limited operations and number of platforms expected. As above, it would be useful to know what assurance mitigations and arguments are being developed to accommodate RPAS in CAS (accepting that operations in Class G airspace, for example, will likely require segregation in the short term). NATS would welcome further engagement and discussion in this respect to see what operational procedures could be attainable and what broader safety assurance work would be required.

Notwithstanding the current limitations of regulation with respect to RPAS operations in UK airspace, NATS would rather seek accommodation where possible rather than segregation and would seek further engagement to explore what activities could support this approach. This would more closely align to the AMS and support DPs a, c, d, f and g.

*f. Endeavour to make the airspace as accessible as possible;*

Covered in other responses.

*g. Minimise the environmental impact of non-participating aircraft;*

NATS acknowledges the design efforts made to continue the availability and use of CTA18 to manage traffic between the BCN and CEN sector groups. Further similar opportunities elsewhere in the airspace should be investigated as there is potential that the dimensions of the options proposed will have significant impact without further refinement of the design and development of management protocols for activation.

The positioning of corridors at complex, transition areas between AORs and ANSP boundaries requires further design development. Has MOD considered the use of current airspace design concepts (corridors) that could be used to reduce operational impact and additional complexity and training requirements?

In addition to other comments above, the current options would impact on night-time routes, standing agreements, for example, in the En-Route environment. These operational procedures have evolved to provide safe and efficient flows of traffic between sectors and transitioning into/out of TMAs.

Similarly, NATS would seek further clarity on what consideration and engagement has been given to the corridors as they cross into other ANSPs/States. NATS would assume that any onwards transit at this point is also under negotiation. It would be useful to understand this during development of the options in order to assess the impact to current coordination procedures and network traffic management.

**Other Questions / Considerations:**

*Equipage:*

What is the Navigation performance specification of the platforms? This would dictate the amount of segregated airspace required (assumed) and allow assessment of the potential to accommodate rather than segregate.

*Flight status:*

NATS assumes this will be OAT with provision of service undertaken by 78 Sqn. Could MOD please confirm so that operational procedures can be agreed?

*Use of alternative solutions:*

Any solution which is based on the implementation of long volumes of segregated airspace, with attendant impact on flight planning, will cause some level of disruption to scheduled air traffic. NATS welcomes the discussions with MOD about how such disruption can be minimised or, ideally, avoided in the future.

## Natural England

**From:** DAATM-AirspaceConsultation (MULTIUSER)  
**Sent:** 22 June 2022 13:48  
**To:** [REDACTED]  
**Subject:** RE: ACP-2021-078 RAF Fairford RPAS Operations - Initial Options Engagement

Good morning [REDACTED]

Thank you for your feedback, and please don't worry about the timing.

As per the options briefing letter, the planned activations would be between 1hr after sunset and 1hr before sunrise. We have engaged with all of the aviation stakeholders in the vicinity of Fairford and the only anticipated civil flying at lower altitudes in that location and in that window is from the emergency services (air ambulance and perhaps police). Based on the very small likelihood of any civil flight being displaced, and the unpredictable nature of their flight paths in the first instance, we anticipate that the impacts on any of the local SSSI would be negligible.

I'm happy to have a chat at any stage if you think there is something we're missing.

Kind regards,

[REDACTED]

[REDACTED] | Sqn Ldr | SO2 Airspace Strategy | Defence Airspace and Air Traffic Management | Aviation House | 1E  
Beehive Ringroad Crawley West Sussex RH6 0YR | [REDACTED]

**From:** [REDACTED]  
**Sent:** 17 June 2022 17:08  
**To:** DAATM-AirspaceConsultation (MULTIUSER) <[DAATM-AirspaceConsultation@mod.gov.uk](mailto:DAATM-AirspaceConsultation@mod.gov.uk)>  
**Subject:** ACP-2021-078 RAF Fairford RPAS Operations - Initial Options Engagement

Dear [REDACTED]

### **Re: ACP-2021-078 RAF Fairford RPAS Operations - Initial Options Engagement**

Apologies for the late response, unfortunately our admin staff put this on the system with a deadline of the 22 June and I have only just realised.

In regard to the above, we are not aware of any evidence of migratory bird routes/heights for Cotswold Water Park SSSI, therefore we do not have any preference on the routes at this stage based on the information provided in the attached letter.

Kind regards

[REDACTED]  
Lead Adviser  
Planning for a Better Environment – West Midlands Team  
Natural England, Worcester County Hall, Spetchley Road, Worcester, WR5 2NP  
[REDACTED]

## RAF Benson

**From:** DAATM-AirspaceConsultation (MULTIUSER)  
**Sent:** 30 May 2022 16:15  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: 20220530-Fairford ACP

Hi [REDACTED]

Thanks for collating feedback. It all makes sense!

Kind regards,

[REDACTED]

[REDACTED] | Sqn Ldr | SO2 Airspace Strategy | Defence Airspace and Air Traffic Management | Aviation House | 1E  
Beehive Ringroad Crawley West Sussex RH6 0YR | [REDACTED]  
[REDACTED]

**From:** [REDACTED] Flt Lt ([REDACTED])  
**Sent:** 30 May 2022 12:54  
**To:** DAATM-AirspaceConsultation (MULTIUSER) <[DAATM-AirspaceConsultation@mod.gov.uk](mailto:DAATM-AirspaceConsultation@mod.gov.uk)>  
**Cc:** [REDACTED] Sqn Ldr (BEN-OpsWg-ATC-SATCO) [REDACTED]  
**Subject:** 20220530-Fairford ACP

Sir/Ma'am

PSA completed form from all airspace users at RAF Benson.

Please let me know if you require any further information or clarification.

Kind regards,

[REDACTED]

[REDACTED] | BMUE | Royal Air Force Benson | Wallingford | Oxon | OX10 6AA [REDACTED]  
[REDACTED]

## RAF Brize Norton

**From:** [REDACTED] Sqn Ldr (DAATM-Airspace Strategy SO2)  
**Sent:** 26 May 2022 14:04  
**To:** [REDACTED] y Fg Off (BZN-OSW-ATC-ATCO 23); DAATM-AirspaceConsultation (MULTIUSER)  
**Cc:** [REDACTED] Sqn Ldr (BZN-OSW-ATC-SATCO); [REDACTED] Flt Lt (BZN-OSW-ATC-DSATCO); [REDACTED] (BZN-Air Wg Dep Commander); [REDACTED] Wg Cdr (BZN-OSW-OC)  
**Subject:** RE: Stakeholder 2A Feedback Form - ACP-2021-078

[REDACTED]

Thank you for comprehensive feedback. The options will now be reviewed taking into account all DP feedback received and the options appraisal before determining what will be presented for formal consultation (ACP Stage 3). At that stage there will be more specific information about each of the presented options.

There were other questions relating to operational procedures and agreements that will certainly need to be addressed alongside this ACP, and I will refer said questions to the USAFE team members. There is a formal request for support being staffed from USAFE to MOD, primarily due to reliance on 78 Sqn to provide ATS to transit traffic, but I will advise that they should include clarification of priorities should there be a conflict between Brize and Fairford traffic that cannot be managed tactically.

Kind regards,

[REDACTED]

[REDACTED] Sqn Ldr | SO2 Airspace Strategy | Defence Airspace and Air Traffic Management | Aviation House | 1E Beehive Ringroad Crawley West Sussex RH6 0YR | [REDACTED]

**From:** [REDACTED] Fg Off (BZN-OSW-ATC-ATCO 23) [REDACTED]  
**Sent:** 25 May 2022 23:04  
**To:** DAATM-AirspaceConsultation (MULTIUSER) <[DAATM-AirspaceConsultation@mod.gov.uk](mailto:DAATM-AirspaceConsultation@mod.gov.uk)>  
**Cc:** [REDACTED] Sqn Ldr (BZN-OSW-ATC-SATCO) <[REDACTED]> [REDACTED] Flt Lt (BZN-OSW-ATC-DSATCO) <[REDACTED]> [REDACTED] Cdr (BZN-Air Wg Dep Commander) [REDACTED] Wg Cdr (BZN-OSW-OC) [REDACTED]  
**Subject:** Stakeholder 2A Feedback Form - ACP-2021-078

Good evening,

PFA RAF Brize Norton's completed Stakeholder 2A Feedback Form reference ACP-2021-078 - RAF Fairford RPAS Operations.

Please let me know if you require any further information.

Kind regards,

[REDACTED]

[REDACTED] Fg Off | ATC | RAF Brize Norton | Carterton | Oxfordshire | OX18 3LX | [REDACTED]  
[REDACTED]

[REDACTED]

## RAF Little Rissington

**From:** [REDACTED] Wg Cdr (SYE-2FTS-HQ-Ops OC)  
**Sent:** 05 May 2022 09:30  
**To:** DAATM-AirspaceConsultation (MULTIUSER)  
**Cc:** [REDACTED] Lt RN (SYE-2FTS-HQ-Ops Flt Lt)  
**Subject:** RE: ACP-2021-078 RAF Fairford RPAS Operations - Initial Options Engagement  
**Attachments:** 20220505-2A Feedback Form RAF LR AO.docx

Thanks for including me [REDACTED]

PSA – Let me know if you need anything else.

Regards

[REDACTED]

[REDACTED]



Wing Commander [REDACTED] 2 FTS OC Ops Wg (Senior Operator, Aerodrome Operator & Regulation)



## RAF Weston on the Green

**From:** [REDACTED] Sqn Ldr (CRN-RAR-STW-SO2 Air Activities)  
**Sent:** 25 May 2022 13:34  
**To:** DAATM-AirspaceConsultation (MULTIUSER)  
**Subject:** RE: ACP-2021-078 RAF Fairford RPAS Operations - Initial Options Engagement

Good Afternoon,

RAF Weston on the Green has no concerns.

*Regards*

[REDACTED]

[REDACTED]

Sqn Ldr

SO2 Air Activities

Robson Academy of Resilience

RAFC Cranwell

Skype +443001522117

[REDACTED]

**From:** [REDACTED]  
**Sent:** 06 June 2022 20:14  
**To:** [REDACTED] Sqn Ldr (DAATM-Airspace Strategy SO2)  
**Subject:** RE: ACP-2021-078

Nope sorry [REDACTED] I pointed out the fact that the CAA have had successful BVLOS operations around Thorney Island. The gate is open, we need to go through it.

Get away from airspace and the world gets so much easier. No safety case, no long, arduous, stressful ACP. The CAA and Sponsors are relaxed. If others can do it, then so can we.

Best

[REDACTED]

-----Original message-----

From: "[REDACTED] Sqn Ldr (DAATM-Airspace Strategy SO2)" [REDACTED]  
Date: 06/06/2022 14:31 (GMT+00:00)  
To: rob [REDACTED]  
Subject: RE: ACP-2021-078

[REDACTED]

I have advised you previously that I am not in a position to share the operating safety cases for any US military systems. The team is working with the CAA to demonstrate that US RPAS can operate safely in UK airspace and also working with appropriate ATC agencies to develop procedures that will facilitate those safe operations. It may be possible to produce a safety argument for integration in extant controlled airspace, however CAP 722 states that Detect and Avoid capability is required, and we are still in a position where these RPAS do not have DAA. In class G airspace, it is even more difficult to demonstrate an equivalence to see and avoid, hence integration is highly unlikely in the short-term and the ACP needs to continue. Should we be able to provide evidence that the operations can take place safely without adhering to policy, the CAA may be able to approve integration, but that is their decision.

This ACP is still in Stage 2, though the engagement period has now closed and we are preparing submissions ahead of the gateway (design principles evaluation and options appraisal, including safety assessment). Subject to satisfactorily passing the Stage 2 gateway, we will enter Stage 3, which will involve a formal consultation period. CAP 1616 ((main body and appendix C) provides direction on consultation and engagement.

I understand your frustrations, but the CAP 1616 process is here to ensure that ACP sponsors give due consideration to safety, operational and environmental impacts and the needs of other airspace users when proposing airspace changes. It allows the CAA to make fair, evidence-based decisions and all interested parties have access to that evidence through the ACP portal. We remain open to engagement throughout and you remain on our list of individuals to be included in all engagement and consultation communications.

Kind regards,

[REDACTED]

From: [REDACTED]  
Sent: 06 June 2022 10:50  
To: [REDACTED] (DAATM-Airspace Strategy SO2) [REDACTED]  
Subject: ACP-2021-078

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

Dear Sir

CAP1616 makes no distinction between consultation and engagement, nor types of airspace application where there is a fundamental difference between the solution a Sponsor wishes to adopt and its consultees. CAP1616 provides the legal precedent (*Elphinstone*) v WCC, EWHC 1287) that indicates the condition which removes the CAA's power to decide.

You will be aware that I have adopted the position set out by the Secretary of State for Transport, which is

"More airfields, less controlled airspace"  
"best place in the world for General aviation"  
"Clearly we need to *integrate* the drones"

As a Sponsor you have adopted the position

Controlled airspace  
GA excluded  
Drone (RPAS) segregation

There being an obligation on the decision maker (the CAA) to initiate a re consultation, where the position of a sponsor on one side fundamentally differs from that of the Secretary of State for Transport and consultees (me) on another. If legal precedent is ignored the decision maker and you as sponsor will be operating *ultra vires*, especially as I have made alternatives known to you.

In the case that Secretary of State for Transport's maintains his position when he and I are re-consulted then this and similar applications must fail.

Although ACP-2020-082 *BVLOS operations in non-segregated airspace around Thorney Island* has only just been approved (01-Jun-2022) it is claimed that successful trials were carried out prior to December 2021. Under these circumstances there can no continued case for BVLOS in segregated Airspace.

I await a copy of your safety case in line with the transparency criteria set out in CAP1616.

[REDACTED]

1. <https://www.flyer.co.uk/transport-secretary-grants-shapps-talks-to-flyer/>

**From:** [REDACTED]  
**Sent:** 23 May 2022 10:20  
**To:** [REDACTED] Sqn Ldr (DAATM-Airspace Strategy SO2)  
**Cc:** [REDACTED]; Airspace Policy  
**Subject:** RE: ACP-2021-078 RAF Fairford RPAS Operations - Initial Options Engagement

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

Thank you  
Positive that the concept of integration is being considered.:-)

A bit worrying that the CAA/USAFE don't feel confident enough in their safety case to publish it. Maybe it's not safe!  
I'll investigate.

Look forward to hearing from you.

[REDACTED]

-----Original message-----

**From:** [REDACTED] Sqn Ldr (DAATM-Airspace Strategy SO2)" [REDACTED]  
**Date:** 19/05/2022 13:48 (GMT+00:00)  
**To:** [REDACTED]  
**Subject:** RE: ACP-2021-078 RAF Fairford RPAS Operations - Initial Options Engagement

Good afternoon [REDACTED]

Thank you for your response to our Stage 2 engagement. The safety case work for US RPAS operating in the UK is being conducted between USAFE and the CAA, it is not something I have visibility of or the authority to share. I have passed your previous correspondence to the USAFE members of the ACP team to review and am waiting for them to get back to me on whether they think a Teams meeting to discuss RPAS integration trials is something they would like me to arrange. I will be in touch again when I hear back.

Kind regards,

[REDACTED]

[REDACTED] Sqn Ldr | SO2 Airspace Strategy | Defence Airspace and Air Traffic Management | Aviation House | 1E  
Beehive Ringroad Crawley West Sussex RH6 0YR | [REDACTED]  
[REDACTED]

**From:** [REDACTED]  
**Sent:** 06 May 2022 14:56  
**To:** DAATM-AirspaceConsultation (MULTIUSER) <[DAATM-AirspaceConsultation@mod.gov.uk](mailto:DAATM-AirspaceConsultation@mod.gov.uk)>  
**Subject:** RE: ACP-2021-078 RAF Fairford RPAS Operations - Initial Options Engagement

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

Hello [REDACTED]

Part forward a copy of your safety case to enable me to consider your proposal in a timely manner. You already have a detailed response from me which we should embark on a two way conversation at your earliest convenience, during which other points will come to light.

Regards

[REDACTED]

**From:** [REDACTED]  
**Sent:** 15 May 2022 17:48  
**To:** DAATM-AirspaceConsultation (MULTIUSER)  
**Cc:** [REDACTED]; Airspace.Policy  
**Subject:** ACP-2021-006

Abingdon cottage  
Station Road  
Dormansland  
Surrey  
RH76NL

Dear [REDACTED]

I have read your Stage 1 submission 2, and was pleased to see my letters included in your document, although you mention that mine and many others are not specifically aimed at design principals. Isn't this an opportunity to learn from your respondents to steer those principals at their objections?

As your primary aim is a safe environment for all airspace users, an evidenced, published safety case is essential.

A key design principle I believe you've missed is to only use a form of controlled airspace as a last resort, since it provokes nothing more than a sticking plaster, or panacea to the problem. Airspace doesn't work. The CAA (2) (Appendix B case 1) has demonstrated this since 2019 when they began publishing statistics. Airspace is too complex and all levels of licence holder are impacted. I look forward to discussions with both you and the CAA.

Another key design principle is to leave no enduring mark on airspace. Once an airspace structure is created is impossible to remove it,

Another Key principle is integration. There are steps that can be taken now.

To help you, I've outlined key consultation points in Appendix A. I think you'll find that it's in everyone's interest to start a two-way conversation early, which you have yet to do.

I've included my evidence-based reasoning for RPAS integration in Appendix B. You will need to shape your solution as you stakeholders needs become evident. Analysing their views will shape the solution.

From Appendix B, it is only a matter of time before RPAV systems BVLOS are operational in the UK. As a consequence, we in the UK are in a transition period, until the first systems are approved here for BVLOS operations. I'm sure that you will want as unrestricted access to UK class G airspace as possible, in line with the freedoms being enjoyed in the USA.

As a consequence, it is our responsibility to ensure that we leave no permanent mark behind us, and we need a general solution that can be applied quickly and consistently. Any permanent airspace structure couldn't fit the bill because.

1. RPAVs would never be truly integrated into class G airspace.
2. The airspace structure would never be removed
3. A domino effect would percolate the permanent airspace structure across the whole of the UK.
4. There will be no imperative to move RPAV BVLOS away from operation in controlled airspace.

#### **AERIAL observer**

My first proposal is for RPAVs BVLOS to use class G airspace with visual observers. This has already been approved by the CAA (1). The variation I'm proposing with a uses a single Aerial Observer.

This solution has the advantage of.

1. RPAVs start in class G and they will remain in class G.
2. RPAVs will, in the future, enjoy access to a greater area of UK airspace.
3. Its not ideal, so there is an imperative on all sides to progress BVLOS integration
4. No permanent impact on class G.
5. No airspace structure to be removed.

Observers are completely in line with the way the CAA works at the moment.

1. Flight ratings checks are undertaken using Visual Observers.
2. Flight examiners are Visual Observers
3. Safety pilots are Visual Observers.

#### **Area of Intense Drone Activity (AIDA)**

Appendix C sets out the existing landscape for a similar, existing, airspace Area of Intense Aerial Activity. Such airspace is a cooperative environment in which different airspace users take their own responsibility for separation. An optional area service can be provided.

Today, High energy Military flights are using inertial navigation or GPS to navigate whilst GA may be using a paper chart. Both commanders share risk and are responsible for separation as the area doesn't change the airspace in any way. It remains true class G airspace.

No AIAA has ever been removed, evidencing their complete success. There have been no more and no less near misses than in other class G airspace, thus evidencing that as being a separate problem.

This option satisfies stakeholders, sponsors and the Secretary of State for Transport's objectives.

A safety case at the very earliest point would be very helpful.

Please submit this email to the airspace portal to provide evidence of my early engagement. I'm happy to help you to form a solution.

Stir [REDACTED] and the Airspace Policy Group are copied.

Best regards

1. CAA approves Visual observers

<https://www.caa.co.uk/news/drone-trial-of-routine-bvlos-operations-concept-authorised/>  
[0. https://airspacesafety.com/statistics/](https://airspacesafety.com/statistics/)

#### **Appendix A**

In CAP1616 (2) Appendix C the CAA says

1. Are there any seldom heard groups impacted?
2. engagement will be required throughout the process by sponsors.
3. ...The CAA's own stakeholder engagement, undertaken during the stages of the process that it leads
4. The core principle underpinning the CAA's assessment of whether a change sponsor is engaging stakeholders effectively will be evidence that the change sponsor is engaging in a two-way conversation.
5. How will they be engaged? What are their needs/requirements? Are there any seldom heard groups impacted? How will material be targeted for different groups and situations identified?
6. Throughout the process, the change sponsor owns the requirement for stakeholder engagement.
7. The change sponsor must be clear to stakeholders about how proposed airspace changes evolve through the stages of the process and how their feedback has informed these evolutions.
8. the CAA .... will seek evidence stakeholders are content that their views have been captured and taken into account by the change sponsor.

### **Appendix B the case for integration**

"More airfields, less controlled airspace"

"best place in the world for General aviation"

"Clearly we need to *integrate* the drones"

Grant Shapps Secretary of State for Transport (1)

#### **Case 1**

Segregated airspace is no panacea for safety (2). There are no barriers to entry or exit and airspace creates a false sense of security.

#### **Case 2**

Real world example. Light aircraft flight Perranporth to Biggin Hill in IMC. Bournemouth hands over to Southampton for a RADAR control service (RCS). 7 miles to run, tracking VOR SAM and an incoming Commercial flight transmits its initial call. The service to the light aircraft is terminated and the pilot (me) is instructed to turn onto a northerly heading and leave controlled airspace 'own navigation'. Ignoring any other aspect, the light aircraft pilot is in the same situation as an RPAS with a command link failure. However, the light aircraft pilot has no control over the situation, and is in a worse situation than a RPAS in class G airspace. The light aircraft was being controlled remotely, the remote pilot (ATC) unexpectedly cut the control link and the on-board pilot is left with few navigation options. (Not a great number of beacons to the North of Southampton).

Flight by a competent RPAS pilot in VMC outside of controlled airspace is in a better proposition than a RCS given to a light aircraft by a commercial operator.

#### **Case 3**

"The CAA has a policy of keeping the volume of controlled airspace to the minimum necessary to meet the needs of UK airspace users and to comply with its international obligations.'(3). No airspace user *needs* another danger area, TMZ, RMZ or any other zone for RPAS to operate safely, when there is an alternative solution available.

#### **Case 4**

Once established, segregated airspace is almost impossible to remove. In recent memory Southend had no airspace at all. It acquired a few fights from Easyjet and a huge chunk of class G airspace in the SouthEast disappeared. The Airport has never been really busy and Commercial flights stopped in August 2020 (4). Even if Southend introduces new commercial flights is airspace isn't justifie.In comparison Exeter Airport manages on similar volumes without any controlled airspace at all, and still services commercial flights. In contrast Southend burns up airspace that could be available to all!

#### **Case 5**

CAP722 reminds us "It is important to emphasise that segregation effectively denies airspace to otherwise legitimate users" (5). TDAs, DAs, TMZ, RMZ are all tools of segregation. Unless there is an imperative, we should all seek a long term non segregated solution. I see no imperative in this application.

#### **Case 6**

Integrated BVLOS is a fact in US, Canada, India, South Africa (6), Rwanda Feb 2020(7), Singapore Apr 2020 (8), Switzerland Feb 2017 (9), Ukraine (200 targets) Jan 2022(10)

#### **Case 7**

UK Armed forces RPAS operating in the US will not have the experience of operating in integrated airspace. Whilst this might be mitigated by pre- training overseas, it is cost effective and safer to train in the UK in class G airspace. The tax payer's money can be spent more efficiently.

#### **Case 8**

How will we treat our allies when they visit the UK on joint exercises? The US Armed forces will think we're bonkers when we tell them RPAS are operating in 'integrated' airspace only to reveal that any RPAS BVLOS needs a danger area or TMZ etc.

#### **Case 9**

CAP1861 provides 3 strategies for achieving RPAS integration.

A letter from Sir Stephen Hillier (11)

"TDAs are neither mandatory, nor the first option, to operate BVLOS"

supports my view and draws my attention to this CAP. This application makes no assessment of CAP1861 strategies or alternative segregated structures and provides no conclusive reasoned argument for establishing a DA.

#### **Case 10**

As long ago as 5th August 2019 the first FAA-approved 'Beyond-Visual-Line-of-Sight' drone flight was completed (12). The UK is in the dark ages and so will lose the RPAS race, if it hasn't already done so. Bold, enabling action is needed to embrace and facilitate true BVLOS in non segregated airspace.

#### **Case 11**

1. Observation, not segregation, is used today to evaluate pilots and their machines abilities by the CAA.
2. Observation is used today, both in the air and on the ground, to evaluate a flying system's fitness to fly by the LAA and microlight association.
3. In 75 years the LAA has never required a TDA, or any segregated airspace to evaluate a new type of aircraft. Its always been assessment by observation In n class G airspace. I can find no significant incidents.
4. The CAA doesn't require the establishment of segregated airspace (- nor should it be required to do so) for practicing aerobatics and aerobatics teams.

#### **Case 12**

Cooperation, collaboration, integration

The FAA has shown a 'can do' attitude to integrating drone operation in all airspace (13),(14),(15), (16),(17). Commercial Drones may operate freely and safely in Class G airspace without being segregated but the operator takes responsibility for avoiding all threats. The same Drone can operate safely in controlled airspace with the agreement of its ATC.

This initiative has seen the FAA

1. Facilitate debate,
2. Form the legislation
3. Allow the people it serves to shape the future

Why can't that happen in the UK?

#### **Case 13**

Flying that starts segregated ends up segregated

#### **Case 14**

Segregation=MOR=Pilot punishment (18)

1. <https://www.flyer.co.uk/transport-secretary-grants-shapps-talks-to-flyer/>

2. <https://www.flyer.co.uk/aaib-report-slams-caa-and-airspeeder-after-demo-drone-crash/>

3. <https://www.caa.co.uk/Commercial-industry/Airspace/Airspace-change/Airspace-Change/>

4. <https://www.independent.co.uk/travel/news-and-advice/southend-airport-easyjet-ryanair-flights-b1900190.html>

5. <https://publicapps.caa.co.uk/modalapplication.aspx?appid=11&mode=detail&id=415>

6. <https://www.irisonboard.com/how-to-get-a-bvlos-waiver/>

7. <https://auterion.com/enabling-bvlos-missions-for-the-african-drone-forum/>

8. <https://www.epshipping.com.sg/first-commercial-beyond-visual-line-of-sight-drone-delivery-bvlos-in-singapore/>

9. <https://www.commercialuavnews.com/energy/first-bvlos-license-switzerland>

10. <https://www.uasvision.com/2022/01/06/ukraine-flight-tests-drone-based-awacs>

11. Letter from Sir Stephen Hillier 1 March 2021



12. <https://dronedj.com/2019/08/05/faa-approved-beyond-visual-line-of-sight-drone-flight/>
13. <https://www.aviationtoday.com/2021/01/22/faa-approves-bvlos-drone-operations-without-visual-observers>
14. <https://www.geekwire.com/2020/faa-issues-safety-rules-smooth-way-amazon-drone-deliveries>
15. <https://www.commercialuavnews.com/infrastructure/beyond-visual-line-sight-operations-next-target-faa-regulation>
16. <https://skyward.io/part-107-basics-commercial-drone-regulations-in-the-u-s/>
17. [https://www.faa.gov/uas/commercial\\_operators/](https://www.faa.gov/uas/commercial_operators/)
18. <https://airspacesafety.com/statistics/>
19. <https://publicapps.caa.co.uk/modalapplication.aspx?appid=11&mode=detail&id=9294>

#### **Appendix C Area of Intense Aerial Activity AIAA**

AIAA are airspace within which Military or Civil aircraft, singly or in combination with others regularly participate in unusual manoeuvres (1). They have been established for decades and few incidents have been recorded in the past 15 years. There have been occasional incidents of late sightings between Military jets and Civil aircraft but I have found no incidents of a serious nature in the last 15 years. Note that near misses can and do happen in class G airspace.

AIAA are marked on CAA aeronautical charts and can extend from surface to 6000 feet with the responsibility for safety resting with airspace users. This altitude range almost completely covers that which GA operate in!

1. Military low flying [https://publicapps.caa.co.uk/docs/33/ga\\_srg\\_09webSSL18November.pdf](https://publicapps.caa.co.uk/docs/33/ga_srg_09webSSL18November.pdf)

## Vale of White Horse Flight Centre

**From:** [REDACTED]  
**Sent:** 08 June 2022 09:40  
**To:** [REDACTED] Sqn Ldr (DAATM-Airspace Strategy SO2)  
**Subject:** Fairford and Brize

Sqn Ldr [REDACTED],

Thank you for the chat yesterday. I found it quite useful and I look forward to seeing how this all concludes. Hopefully your US colleagues will get to grips with the fact that they have chosen an operational base that is in a busy air traffic area and that we all have to work out how this will work for the benefit of all.

The biggest thing for us a a gliding and flight training centre, is to develop an awareness, understanding and communication route between us and your colleagues at Brize and Fairford. As mentioned, a letter of understanding with Fairford would be very useful. Building on from that, something that we don't do but that I feel would help us all, is to get a link between ourselves and Brize ATC. I would be keen to get visibility on future NOTAMs and for us to be able to inform your colleagues of days/periods that we are busy and launching lots of gliders. If there is any way that you can put me in touch with Brize ATC to get this started, I would be very grateful.

If you have any further questions or new information regarding the RPA project, please do not hesitate to drop me a line.

Thanks again and best wishes,

[REDACTED]

Flight Instructor  
Aerobatics<>Night<>Complex Types<>Tailwheel  
SEP<>TMG

07979 464733

**From:** [REDACTED] (DAATM-Airspace Strategy SO2)  
**Sent:** 07 June 2022 12:02  
**To:** [REDACTED]  
**Subject:** RE: RE: RE: ACP-2021-078 RAF Fairford RPAS Operations - Initial Options Engagement

Hi [REDACTED],

I'll give you a call at 2.30pm on the mobile number in your signature block. If you're not around, I can try again later on.

Kind regards,

[REDACTED]

[REDACTED] Sqn Ldr | SO2 Airspace Strategy | Defence Airspace and Air Traffic Management |

Aviation House | 1E Beehive Ringroad Crawley West Sussex RH6 0YR | [REDACTED] |

[REDACTED]

[REDACTED] | [REDACTED]

**From:** [REDACTED]  
**Sent:** 07 June 2022 11:40  
**To:** [REDACTED] (DAATM-Airspace Strategy SO2) <[REDACTED]>  
**Subject:** Re: RE: RE: ACP-2021-078 RAF Fairford RPAS Operations - Initial Options Engagement

Hi [REDACTED]

I have been able to shift some things around and would be able to have a chat with you tomorrow afternoon. As long as this is still available, please let me know a suitable time? I currently do not have Teams so I'm happy just to have a voice call if that works for you?

With best wishes,

[REDACTED]  
Instructor: Fl(A)

Aerobatics•Night•Complex Type•Tailwheel  
SEP•TMG

07979 464733

Monday, 6 June 2022, 16:09 +0100 from [REDACTED] Sqn Ldr (DAATM-Airspace Strategy SO2) <[REDACTED]>

Hi [REDACTED]

Your emails are going to my junk folder for some reason, so I've only just seen this. A Teams meeting would be my preference at this time as I'm not based in the Fairford/VOWH area. I now have meetings scheduled 1330-1400 Tue and 1300-1330 Wed but the other options still stand.

Kind regards,

[REDACTED]  
[REDACTED] | SO2 Airspace Strategy | Defence Airspace and Air Traffic Management |  
Aviation House | 1E Beehive Ringroad Crawley West Sussex RH6 0YR | [REDACTED]  
[REDACTED]  
[REDACTED]

**From:** [REDACTED]  
**Sent:** 01 June 2022 21:22  
**To:** [REDACTED] Sqn Ldr (DAATM-Airspace Strategy SO2) <[REDACTED]>  
**Subject:** Re: RE: RE: ACP-2021-078 RAF Fairford RPAS Operations - Initial Options Engagement

Dear Sqn Ldr [REDACTED]

Thank you for getting back to me. Very appreciated. Are you able to meet us in person on site at our airfield or are you only offering video meetings at this stage?

Best wishes,

[REDACTED]  
Instructor: FI(A)  
Aerobatics•Night•Complex Type•Tailwheel

SEP•TMG  
07979 464733

Wednesday, 1 June 2022, 13:59 +0100 from [REDACTED]

[REDACTED] >:

Good afternoon [REDACTED]

Thank you for taking the time to provide feedback, and we're absolutely happy to have a discussion about potential impacts on your operations so that we can design to minimise disruption as much as possible. I can be available next week for a Teams meeting in any of the following time windows:

Mon 6<sup>th</sup> – 1500-1700

Tue 7<sup>th</sup> – 0900-1030

Tue 7<sup>th</sup> – 1300-1600

Wed 8<sup>th</sup> – 1030-1200

Wed 8<sup>th</sup> – 1300-1600

Please can you let me know when would suit you and I can send a Teams meeting request.  
Kind regards,

[REDACTED]  
[REDACTED] Sqn Ldr | SO2 Airspace Strategy | Defence Airspace and Air Traffic Management |  
Aviation House | 1E Beehive Ringroad Crawley West Sussex RH6 0YR | [REDACTED]

**From:** [REDACTED]  
**Sent:** 31 May 2022 17:59  
**To:** DAATM-AirspaceConsultation (MULTIUSER) <[DAATM-AirspaceConsultation@mod.gov.uk](mailto:DAATM-AirspaceConsultation@mod.gov.uk)>  
**Subject:** Re: ACP-2021-078 RAF Fairford RPAS Operations - Initial Options Engagement

Dear Squadron Leader [REDACTED],

Please find attached the review of ACP-2021-078 that you forwarded to us for review. This has been something that we have reviewed as airspace users who are impacted by the RPA operations.

We would very much like to get a dialogue going with you about progressing the plan forward. The general feeling is that we see the need for the airspace and we do not want to stand in its way. However, all the options and proposals that have been suggested have the potential to majorly impact our operations. We are mainly a gliding centre and so the potential for us be impacted both in the launch and recovery phase could be significant. We do not want to stand in the way of this moving forward but we would like to be involved in creating procedures that allow us the minimum disruption to our flight operations whilst being as cooperative with you as possible.

There was a general feeling that whilst this probably has little cause for concern in its current state, we could easily be hit by changes that result in more extensive outage periods in the future. We truly believe that there is room for us all to operate together safely and harmoniously but this will only be achieved if we are able to communicate together. We really hope that as all options affect us, we can start a dialogue focused on the scope of this proposal which can then be used as a platform for future cooperation and expansion that will inevitably happen. We look forward to hearing from you and look forward to working with you.

With best wishes,



Head of Training  
Vale of the White Horse Flight Centre

## Wiltshire Air Ambulance

**From:** [REDACTED]  
**Sent:** 11 May 2022 11:16  
**To:** DAATM-AirspaceConsultation (MULTIUSER)  
**Subject:** WAACT feedback  
**Attachments:** 2A Feedback Form.docx


Please see attached

regards

[REDACTED]  
[REDACTED]  
*Chief Pilot*  
*Wiltshire Air Ambulance*

[REDACTED]



 *Wiltshire Air Ambulance, Outmarsh, Semington, Wiltshire, BA14 6JX*



Registered charity number 1144097

## **Feedback Request Emails**

The following emails were sent from the Sponsor to the Stakeholders on 5<sup>th</sup> May 2022:

### **Local and National Aviation Stakeholders**

**From:** DAATM-AirspaceConsultation (MULTIUSER)  
**Sent:** 05 May 2022 08:48  
**Subject:** ACP-2021-078 RAF Fairford RPAS Operations - Initial Options Engagement  
**Attachments:** Stage 2A Initial Options Engagement Letter.pdf; 2A Feedback Form.docx

Dear stakeholder,

The MOD is working with the US Air Force in Europe to Sponsor an Airspace Change Proposal that will enable Remotely Piloted Aircraft to operate from RAF Fairford as they enter and leave UK airspace. During Stage 1, we engaged with potentially affected stakeholders to develop a list of design principles that have now been used to help shape our initial list of options, which can be found in the attached engagement letter. We are now requesting your feedback on whether the initial options align with the design principles. A feedback form is provided to assist. We are also happy to take general feedback, but ask that all feedback be returned by email, to be received by Thu 2 Jun 22.

As with Stage 1, please pass on this email across your organisation or to any other airspace users you think may be affected. Due to some of the working assumptions, such as activation only at night and provision of a crossing service, along with preliminary data gathering, we believe that there will be close to no impact on users of the surrounding Class G airspace. The Sponsor is keen to engage directly with any stakeholders who believe their aviation activity will be affected by this ACP and ask that you contact us as soon as possible to discuss the nature and extent of the expected impact.

Kind regards,

[REDACTED]

[REDACTED] | SO2 Airspace Strategy | Defence Airspace and Air Traffic Management | Aviation House | 1E  
Beehive Ringroad Crawley West Sussex RH6 0YR | [REDACTED]  
[REDACTED]

## Local Authority and Other Organisations

**From:** DAATM-AirspaceConsultation (MULTIUSER)  
**Sent:** 05 May 2022 08:54  
**Subject:** ACP-2021-078 RAF Fairford RPAS Operations - Initial Options Engagement  
**Attachments:** Stage 2A Initial Options Engagement Letter.pdf; 2A Feedback Form.docx

Dear stakeholders,

The MOD is working with the US Air Force in Europe to Sponsor an Airspace Change Proposal that will enable Remotely Piloted Aircraft to operate from RAF Fairford as they enter and leave UK airspace. During Stage 1, we engaged with potentially affected stakeholders to develop a list of design principles that have now been used to help shape our initial list of options, which can be found in the attached engagement letter. We are now requesting your feedback on whether the initial options align with the design principles. A feedback form is provided to assist. We are also happy to take general feedback, but ask that all feedback be returned by email, to be received by Thu 2 Jun 22.

As with Stage 1, please pass on this email across your organisation or to any other organisations or communities you think may be affected.

Kind regards,

[REDACTED]

[REDACTED] SO2 Airspace Strategy | Defence Airspace and Air Traffic Management | Aviation House | 1E  
Beehive Ringroad Crawley West Sussex RH6 0YR | [REDACTED]  
[REDACTED] | [REDACTED]



## Engagement Meeting Emails

### Meeting with 78 Squadron at Swanwick

Follow-up of Engagement regarding ACP-2021-078 (Permanent Airspace) & ACP 2022-08 (TDA)

From: [REDACTED] (SWK-78Sqn-ATCO06) [REDACTED]  
Sent: Sunday, June 5, 2022 9:58 AM  
To: [REDACTED] USAFE A3/A3AA [REDACTED]  
Cc: [REDACTED] SWK-78Sqn-OC 2FIt [REDACTED]  
Subject: [Non-DoD Source] Re: Follow-up of Engagement regarding ACP-2021-078 (Permanent Airspace) & ACP 2022-08 (TDA)

[REDACTED]

We are very glad the meeting was helpful to the progression of ACP-2021-078 and ACP 2022-08. Please let us know if there is anything else you need from us and we will of course assist you in any way we can.

Many thanks,

[REDACTED]

[REDACTED] est Bank StanO | 78 Sqn Swanwick | NATS | Sopwith Way | SO31 7AY | [REDACTED]  
[REDACTED]  
[REDACTED]

---

From: [REDACTED] USAFE A3/A3AA  
Sent: Wednesday, June 01, 2022 14:30  
To: [REDACTED] (SWK-78Sqn-OC 2FIt); [REDACTED] (SWK-78Sqn-ATCO06); [REDACTED] (SWK-78Sqn-Dep OC 2FIt)  
Cc: [REDACTED] USAFE A3/A3AA  
Subject: RE: Follow-up of Engagement regarding ACP-2021-078 (Permanent Airspace) & ACP 2022-08 (TDA)

Greetings [REDACTED] and Team,

I know you all are probably very busy with matters related to the Queen's Jubilee. When you have time, could you kindly make a quick response to my email below? John and I will use these as formal documentation of our ACP engagement activities. No rush but please get back to me when you're not so busy.

Have a wonderful day and rest of week.

Respectfully,

[REDACTED]  
[REDACTED]

HQ USAFE-AFAFRICA A3/A3AA

-----Original Message-----

From: [REDACTED] USAFE A3/A3AA

Sent: Monday, May 9, 2022 11:49 AM

To: [REDACTED] (SWK-OC 2 Ops) <[REDACTED]> [REDACTED] (SWK-ATCO13)

Cc: [REDACTED] USAFE A3/A3AA [REDACTED] (DAATM-Airspace Strategy SO2) <[REDACTED]> [REDACTED] USAFE USAFE UK/Airspace Operations [REDACTED] USAFE 420 ABS/OS [REDACTED]

[REDACTED] USAFE UK/Airspace Operations [REDACTED]  
Subject: Follow-up of Engagement regarding ACP-2021-078 (Permanent Airspace) & ACP 2022-08 (TDA)

Greetings [REDACTED],

[REDACTED] I would like to thank you both for hosting our engagement meeting at Swanwick on 27 April 2022 for design options related to ACP-2021-078 (Permanent Airspace) & ACP 2022-08 (TDA) . Our discussions regarding traffic flows in proximity to the proposed locations of the airspace as well as potential confliction/deconfliction were very useful and insightful. Additionally, we covered possible locations and dimensions for MALE and HALE airspace. Finally, you provided us with detailed explanations on how handoffs and transfers of communications will likely occur between RAF Brize Norton ATC and Swanwick.

[REDACTED] and I will continue engaging with you and your team as the ACP progresses through future stages of the process.

Respectfully,

[REDACTED]

[REDACTED]  
HQ USAFE-AFAFRICA A3/A3AA

[REDACTED]  
[REDACTED]  
[REDACTED]

## Meeting with RAF Brize Norton ATC

Follow-up of Engagement regarding ACP-2021-078 (Permanent Airspace) & ACP 2022-08 (TDA)

From: [REDACTED]  
Sent: Tuesday, June 7, 2022 9:40 PM  
To: [REDACTED] USAFE A3/A3AA [REDACTED]  
Cc: [REDACTED] (BZN-OSW-ATC-DSATCO) [REDACTED] (BZN-OSW-ATC-SATCO) [REDACTED]  
Subject: [Non-DoD Source] RE: Follow-up of Engagement regarding ACP-2021-078 (Permanent Airspace) & ACP 2022-08 (TDA)

Good evening [REDACTED]

Please accept my apologies for Brize's late response to your email in the trail.

Many thanks for coming to Brize to discuss the Fairford ACP - it was great to chat face-to-face, I think it was time well spent and I hope that you and [REDACTED] found it useful too.

I will be leaving the RAF in the next month so please continue to use [REDACTED] as your point of contact for the ACP.

All the very best,

[REDACTED]

[REDACTED]

[REDACTED] | ATC Sqn | RAF Brize Norton | Carterton | Oxon | OX18 3LX | [REDACTED]  
[REDACTED] RAF Brize Norton's Mission: Prepare for and deliver global Air Mobility Operations.

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-----Original Message-----

From: [REDACTED] USAFE USAFE A3/A3AA [REDACTED]  
Sent: 01 June 2022 14:34  
To: [REDACTED] BZN-OSW-ATC-SATCO)  
<[REDACTED] (BZN-OSW-ATC-DSATCO)  
[REDACTED]>  
Cc: [REDACTED] USAFE A3/A3AA [REDACTED]  
Subject: RE: Follow-up of Engagement regarding ACP-2021-078 (Permanent Airspace) & ACP 2022-08 (TDA)

Greetings [REDACTED]

I know you all are probably very busy with matters related to the Queen's Jubilee and numerous other operational matters. When you have time, could you kindly make a quick response to my email below? [REDACTED] will use these as formal documentation of our ACP engagement activities. No rush but please get back to me when you're not so busy.

Have a wonderful day and rest of week.

Respectfully,

[Redacted]  
HQ USAFE-AFAFRICA A3/A3AA  
[Redacted]

-----Original Message-----

From: [Redacted] USAFE USAFE A3/A3AA  
Sent: Monday, May 9, 2022 12:52 PM  
To: [Redacted] (BZN-OSW-ATC-DSATCO) [Redacted] k>; [Redacted] (SJFHQ-Operations-JBM-Air-SO2) [Redacted] (ODI-Ops-ATC ATCO 12)  
[Redacted]  
Cc: [Redacted] USAFE USAFE A3/A3AA [Redacted] (DAATM-Airspace Strategy SO2) [Redacted] E USAFE UK/Airspace Operations [Redacted] USAFE USAFE UK/Airspace Operations <[Redacted] USAFE 420 ABS/OS [Redacted]>  
Subject: Follow-up of Engagement regarding ACP-2021-078 (Permanent Airspace) & ACP 2022-08 (TDA)

Greetings [Redacted],

My colleague [Redacted] I would like to thank each of you and Team RAF Brize Norton ATC for hosting the engagement meeting on 26 April 2022.  
Additionally, many thanks to [Redacted] from Team RAF Fairford for organizing the event.

Engagement discussions focused on design options related to ACP-2021-078 (Permanent Airspace) & ACP 2022-08 (TDA). The feedback provided on potential future procedures regarding departure coordination from RAF Fairford, deconfliction/crossing services, traffic flows in proximity to proposed ACP airspace, as well as likely handoff/transfer of communication methods between RAF Brize Norton ATC and Swanwick were very useful. Future interactions and engagement sessions like these are critical to overall success of this project.

[Redacted] and I will continue engaging with you and your team as the ACP moves forward through the various stages in this process.

Respectfully,

[Redacted]  
[Redacted]  
HQ USAFE-AFAFRICA A3/A3AA  
[Redacted]  
[Redacted]  
[Redacted]