

	A	B	C	D	E	F	G	H	I	J	K	L	M	N
		Organisation / Stakeholder Type (Q4 - 7)	Support the ACP? (Q8)	Response to combined airspace design (Q9)	Response to low airspace design (Stage 2 Option 1) (Q10)	Response to medium airspace design (Refined Stage 2 Option 2) (Q11)	Alterations to Improve the Proposal (Q12)	Explanation of Objection to Proposal (Q13)	Proposed Mitigations or Alterations to the Proposal (Q14)	General Considerations (Q15)	Response may impact final proposal		Response does not impact final proposal	Change Sponsor Reasoning / Justification (You said, we did)
											Impacted	Not Impacted		
1	1	CEO, British Helicopter Association (NATMAC Organisation)	Yes	Strongly Support	Strongly Support	Strongly Support	The BHA supports this ACP and requires no alterations						X	Response of support for ACP with no further comments.
2	2	Individual	Yes	Strongly Support	Strongly Support	Strongly Support	Support the current proposals						X	Response of support for ACP with no further comments.
3	3	Local Authority Stakeholder	Yes	Strongly Support	Strongly Support	Strongly Support	There needs to be safe space for viewing as the current week has shown the number of people stood on the verge close to the A15 is at times dangerous. Some space could be used near where the Vulcan typically is parked for parking and viewing which would keep the road free from pedestrians						X	Local community infrastructure (outside ACP scope) Respondent makes comment on safety aspects of provision of viewing area.
4	4	Individual	Yes	Strongly Support	Strongly Support	Strongly Support							X	Response of support for ACP with no further comments.
5	5	Individual	Yes	Strongly Support	Strongly Support	Strongly Support							X	Response of support for ACP with no further comments.
6	6	Individual	No	Strongly Object	Strongly Object	Strongly Object		I am not happy that the RAFAT are planned to be practicing their aerobatic manoeuvres over our local built up areas. At Scampton their location was rural and surrounded by far fewer dwellings. Even with that said, those of us who have lived locally for years remember the mid air collision over the village of Welton involving RAFAT. Another crashed on finals for Runway 21, fortunately onto farm land. With the Waddington area being far more built up, the risk to local residents is much higher. The RAFAT have a poor accident record in recent years and I would not feel safe with RAFAT's fifty year old aircraft operating over my and my families heads. RAF Barkston Heath or RAF Syerston would, in my opinion be much safer locations for EGR313.	Move EGR313 to RAF Syerston or Barkston Heath.	Public safety in the built up areas surrounding the aerodrome at RAF Waddington. I am not worried about Protector but certainly would not want EGR313 over my property.			X	Safety aspects of RAFAT activity Information on the safety assurance of RAFAT activity was provided within the Consultation material. This can be found in the FAQs page uploaded to the Citizen Space portal (see Question 10) and was published within the Consultation Document Issue 1.0 at Annex A. In addition the Change Sponsor provides the following regarding RAFAT overflight. The majority of the aerobatic manoeuvring and training will occur directly overhead the WAD airfield boundary itself and mostly to the East in the least built up part of the airspace. The larger villages of Bransdon and Bracebridge Heath are on the edges of the aerobatic box and will seldom see aerobatic overflight below 500ft. Aerobatic flight below 500ft will not occur to the West of the airfield where the more BUAs exist (Hykeham, South Lincoln etc). In addition RAFAT confirm that there would be no aerobatic overflight below 500ft of Harmsdon as the village is located just outside the main display area at RAF Waddington.
7	7	Individual	Yes	Strongly Support	Strongly Support	Strongly Support							X	Response of support for ACP with no further comments.
8	8	Individual	Yes	Strongly Support	Strongly Support	Strongly Support	Nothing of note	N/a	N/a	Advance communication of increased sudden noise levels as can have a detrimental affect on animals so domestic pets can be helped		X	X	Response of support for ACP with no further comments. Modification of airspace activities The airspace will be activated by NOTAM which will be promulgated via the AIS website. However, the Change Sponsor does not think that this is what the respondent is suggesting. Rather a request for actual RAFAT display times to be published on a daily basis. The Change Sponsor considered the possibility of publishing airspace activation for RAFAT activity. RAFAT display times can be published but there is a risk balance to be had. If display times are published/advertised in advance then the risk of additional secondary spectators in the display area/build up of traffic on A15 is increased. This is partly why display practice times were never published at Scampton.
9	9	Chief Flying Instructor, York Gliding Centre (Aviation Stakeholder)	No	Object	Object	Strongly Support	We would like to be able to support the combined proposals in terms of better enabling the RAF to defend the people of the UK. Our objection focuses on two important aspects of detail which, if appropriately address, would enable us to support the proposal in the round. Our issues are: 1. The strong suggestion in the Options Appraisal is that RAFAT may use the low airspace design around lunchtime but EG R313 (or an alternative elsewhere) at others. Particularly of the 'at other times' alternative is the adjoining EG R313, this will be confusing for low level air traffic. It will make it very difficult to plan even approximate routings for slow moving traffic such as gliders that cannot be sure when they set off their exact arrival time at each waypoint as this is dependent on meteorological conditions. In other words we will not know whether it is the Scampton area or the Waddington area we will need to avoid when we set off and we do not have the ability to re-route without bounds. For example, see breeze fronts that develop during the day would make it impossible to soar further East as the frontal system develops in the summer months. Moreover, the reason given for 'lunchtime', practices by RAFAT over Waddington appears to be the entertainment of dignitaries and commercial partners. This is an inadequate justification for jeopardising safety through confusion of airspace users. The RAF must decide whether to use the Waddington practice area, the Scampton practice area or an alternative practice area but it should not reserve options on all three at the cost of reducing safety margins. 2. We support the use of temporary danger areas to deconflict RAFAT and Protector from other traffic. However, the mechanism for notification and obtaining a crossing service needs to be refined and simplified to make it useable by amateur/recreational pilots, especially as the danger area is likely to be activated from time to time at weekends. We note that ATC will only be staffed when the danger area is activated making the confirmation of 'cold' status difficult at other times. Across the areas commonly flown by pilots from Rufforth West (York Gliding Centre), we note sporadic provision of air traffic services when RAF airfields have no military activity. We suggest an ATIS-like service whereby passing aircraft can at least tune to an automated message in	1. The RAF must decide whether to use the Waddington practice area, the Scampton practice area or an alternative practice area but it should not reserve options on all three at the cost of reducing safety margins. 2. We suggest an ATIS-like service whereby passing aircraft can at least tune to an automated message in flight to find out if the danger area is likely to be hot or cold when they arrive in the vicinity. If these two issues were to be resolved we feel we would be able to support the whole proposal.	The Defence Infrastructure Organisation, which is part of the MoD, is managing the sale of the RAF Scampton technical site. Under government policies regarding "Assets of Community Value", community groups are required to be privileged in the disposal process. West Lindsey District Council is exercising its right to be considered first and has identified five potential commercial partners based on track record and financial backing. Shortly, the number of potential partners will be further reduced as the Council has stipulated strict planning constraints on the site. These include a wish to see the airfield remain open as an airfield; for EG R313 to remain available to RAFAT and the preferencing of proposals that provide a visitor centre for the Red Arrows that would facilitate corporate and VIP visits. It is entirely within the gift of the MoD and DIO to firm up the relationship between this ACP and the Scampton disposal process and remove the uncertainty around RAFAT's practice area that has resulted in the modification of the ACP to negate the need for 'back-up' plans. We would like to see public assurances that, should EG 313 continue to be available to RAFAT, the elements of the ACP that relate to accommodating RAFAT practice over Waddington will be rescinded without the need for a further ACP to remove them. The outcome of the Scampton sale to WLDC and its chosen business partner should be known before the ACP process concludes. If there are delays, the ACP decision should be delayed until the outcome of the sale is formally confirmed.		X	Simultaneous use of EG R313 and Waddington proposed airspace RAFAT has provided further indications as to how the proposed airspace at RAF Waddington may be used alongside EG R313, depending on the viability of EG R313 for RAFAT practice displays. This is part of this document set at Annex B, but in summary there will be no requirement for the proposed airspace at Waddington and EG R313 to be activated on the same day for RAFAT activity. Therefore, a DACS through one or the other should be approved (dependent on any other conflicting airspace activity, of course). Should EG R313 be required for RAFAT at Waddington, a DACS through one or the other volumes of airspace will be available (dependent on any other conflicting airspace activity, of course).		
10	10	Individual	Yes	Strongly Support	Strongly Support	Strongly Support	I have lived in Waddington for the last 50 years also under the flight path into RAF Waddington. I have lived with Vulcans, AWACS and just about every aircraft the RAF has ever flown. I and my wife have no problems with extra flights in the airspace around our village. The noise is after all a small price to pay for our freedom.						X	Response of support for ACP with no further comments for consideration.
11	11	Director, AP Alarms & CCTV Ltd	Yes	Strongly Support	Strongly Support	Strongly Support							X	Response of support for ACP with no further comments.
12	12	Individual	No	Strongly Object	Strongly Object	Strongly Object	The red arrows have been at scampton for many years why can't they use the air space round scampton ?						X	MOD to retain use of Scampton and/or EG R313 The Change Sponsor provided information regarding the basing of RAFAT at RAF Waddington. This can be found in the FAQs page uploaded to the Citizen Space portal (see Q12 & 13) and was published within the Consultation Document Issue 1 at para 1.19 and further in Annex A.
13	13	Individual	No	Strongly Object	Strongly Object	Strongly Object	Live close to RAF Waddington and the proposed airspace Risk to property due to flight display practise and potential mid air collision Increase in aircraft noise Display routines will attract increase traffic and congestion on side roads and on estates to try and photograph and view RAFAT	Should have kept Scampton airspace open or use of RAF Syerston for RAFAT purposes	Look at other less built up areas or do not move from Scampton Or use RAF Syerston for display routine practises				X	The Change Sponsor is not totally clear if the respondent is solely concerned with the safety of RAFAT flights, so has also included comment about Protector's safety assurance below. Safety of RAFAT activity The Change Sponsor provided information on the safety assurance of RAFAT activity within the Consultation material. This can be found in the FAQs page uploaded to the Citizen Space portal (see Question 10) and was published within the Consultation Document Issue 1.0 at Annex A. In addition the Change Sponsor provides the following regarding RAFAT overflight. The majority of the aerobatic manoeuvring and training will occur directly overhead the WAD airfield boundary itself and mostly to the East in the least built up part of the airspace. The larger villages of Bransdon and Bracebridge Heath are on the edges of the aerobatic box and will seldom see aerobatic overflight below 500ft. Aerobatic flight below 500ft will not occur to the West of the airfield where the more BUAs exist (Hykeham, South Lincoln etc). In addition RAFAT confirm that there would be no aerobatic overflight below 500ft of Harmsdon as the village is located just outside the main display area at RAF Waddington.
14	14	Individual	Yes	Strongly Support	Strongly Support	Strongly Support	Local infrastructure such as roads and cycle ways and footpaths would need to be improved to cope with current and future increased land based traffic			See above for infrastructure. Equally, accommodation for new staff may need to be considered in the light of current building and flood plain land and green wedge. Sewage works on the Witham may need updating rather than expanding			X	Local community infrastructure (outside ACP scope) Increased traffic congestion
15	15	Individual	No	Strongly Object	Strongly Object	Strongly Object	The airspace change proposal will allow the RAFAT to practice flying displays over RAF Waddington and the immediate surrounding area. When conducting displays and practices over RAF Waddington in the past, the aircraft of the RAFAT have frequently flown over Harmsdon village at heights well below 500 ft. This is in contravention of CAA airspace procedures for overflight of built up areas and RAF Waddington flying regulations. With the RAFAT to be permanently based at RAF Waddington there is a strong likelihood of these occurrences at an increased frequency which will adversely affect the reputation of the RAFAT and RAF at large. The RAFAT presence will incur additional aircraft noise in the local area around RAF Waddington. Will the RAF provide for additional (Triple) glazing to local residents - specifically Harmsdon where I live? Additionally, the presence of the RAFAT will attract numerous aircraft enthusiasts to the locality who will park their cars on the local roads and surrounding estates thus causing a nuisance to local residents and result in road congestion. There would be an increase in the risk of a road traffic accident on the A607 and A15 as drivers could be distracted by low flying aircraft of the RAFAT. The presence of the RAFAT will increase the mid-air collision risk in the RAF Waddington area which will incur increased risk to life to members of the public and risk of damage to public property. This increase in risk to life will have to be met by the either the Senior or Operational Duty holder of the RAFAT. As individuals of the Armed Forces are no longer protected by Crown Immunity I will use the RAFAT Duty holder personally if any of my family or property are adversely affected following an incident caused by the RAFAT.	The rationale for moving the RAFAT to RAF Waddington was to facilitate the closure of RAF Scampton. The airspace above RAF Syerston is available to accommodate the RAFAT needs. The area surrounding RAF Syerston is not built up and would reduce the risk to life to the public, when compared to RAF Waddington. The argument that the proximity of the A46 would lead to an increased risk of a road traffic accident if the RAFAT operated above RAF Syerston is no different to that at RAF Waddington given the station has the A607 and A15 trunk roads bordering the aerodrome.			X	Safety of RAFAT activity Information on the safety assurance of RAFAT activity was provided within the Consultation material. This can be found in the FAQs page uploaded to the Citizen Space portal (see Question 10) and was published within the Consultation Document Issue 1.0 at Annex A. In addition the Change Sponsor provides the following regarding RAFAT overflight. The majority of the aerobatic manoeuvring and training will occur directly overhead the WAD airfield boundary itself and mostly to the East in the least built up part of the airspace. The larger villages of Bransdon and Bracebridge Heath are on the edges of the aerobatic box and will seldom see aerobatic overflight below 500ft. Aerobatic flight below 500ft will not occur to the West of the airfield where the more BUAs exist (Hykeham, South Lincoln etc). In addition RAFAT confirm that there would be no aerobatic overflight below 500ft of Harmsdon as the village is located just outside the main display area at RAF Waddington.		
16	16	Individual	No	Strongly Object	Strongly Object	Strongly Object							X	Noise The Change Sponsor provided information on the noise impact of both RAFAT and Protector activity within the consultation material. This can be found in the Consultation Document Issue 1 (see paras 5.1, 5.9.1). More information can be found in the Full Options Appraisal which is on the CA ACP Portal.
17	17	Individual	No	Strongly Object	Strongly Object	Strongly Object							X	Relocation of RAFAT flying display training area away from Waddington The Change Sponsor also provided information regarding the basing of RAFAT at RAF Waddington. This can be found in the FAQs page uploaded to the Citizen Space portal (see Q12 & 13) and was published within the Consultation Document Issue 1 at para 1.19 and further in Annex A.
18	18	Individual	Yes	Strongly Support	Strongly Support	Strongly Support							X	Local community infrastructure (outside ACP scope) Increased traffic congestion
19	19	Individual	No	Strongly Object	Strongly Object	Strongly Object							X	Safety of Protector activity The Change Sponsor provided information on the safety assurance of the Protector activity within the Consultation material. This can be found in the FAQs page uploaded to the Citizen Space portal (see Question 6).
20	20	Individual	No	Strongly Object	Strongly Object	Strongly Object							X	Noise The Change Sponsor provided information on the noise impact of both RAFAT and Protector activity within the consultation material. This can be found in the Consultation Document Issue 1 (see paras 5.1, 5.9.1). More information can be found in the Full Options Appraisal which is on the CA ACP Portal.
21	21	Individual	No	Strongly Object	Strongly Object	Strongly Object							X	Local community infrastructure (outside ACP scope) Increased traffic congestion
22	22	Individual	No	Strongly Object	Strongly Object	Strongly Object							X	Noise The Change Sponsor provided information on the noise impact of both RAFAT and Protector activity within the consultation material. This can be found in the Consultation Document Issue 1 (see paras 5.1, 5.9.1 & 5.9.4). More information can be found in the Full Options Appraisal which is on the CA ACP Portal.
23	23	Individual	No	Strongly Object	Strongly Object	Strongly Object							X	Local community infrastructure (outside ACP scope) Increased traffic congestion
24	24	Individual	No	Strongly Object	Strongly Object	Strongly Object							X	Noise The Change Sponsor provided information on the noise impact of both RAFAT and Protector activity within the consultation material. This can be found in the Consultation Document Issue 1 (see paras 5.1, 5.9.1 & 5.9.4). More information can be found in the Full Options Appraisal which is on the CA ACP Portal.
25	25	Individual	No	Strongly Object	Strongly Object	Strongly Object							X	Local community infrastructure (outside ACP scope) Increased traffic congestion
26	26	Individual	No	Strongly Object	Strongly Object	Strongly Object							X	Local community infrastructure (outside ACP scope) Increased traffic congestion

	A	B Organisation / Stakeholder Type (Q4 - 7)	C Support the ACP? (Q8)	D Response to combined airspace design (Q9)	E Response to low airspace design (Stage 2 Option 1) (Q10)	F Response to medium airspace design (Refined Stage 2 Option 8) (Q11)	G Alterations to Improve the Proposal (Q 12)	H Explanation of Objection to Proposal (Q13)	I Proposed Mitigations or Alterations to the Proposal (Q14)	J General Considerations (Q15)	K Response may impact final proposal		L Response does not impact final proposal	M Change Sponsor Reasoning / Justification (You said, we did)
											Impacted	Not Impacted		
1														
2														
27													X	Relocation of RAFAT flying display training area away from Waddington The Change Sponsor also provided information regarding the basing of RAFAT at RAF Waddington. This can be found in the FAQs page uploaded to the Citizen Space portal (see Q12 & 13) and was published within the Consultation Document Issue 1 at para 1.19 and further in Annex A.
28													X	Alternative use of Systerston RAF Systerston is not a suitable site for a full RAFAT training programme due to its location in the Trent Valley Transit Area. This limits its use to the quieter winter months only. Also, to minimise the impact on local aviation, RAFAT will look to minimise its use to that which is deemed essential. As Systerston has a runway which is required for Synchro Pair training, they will focus on using it over the main formation. Also, it has limited vertical extent which really only makes it suitable for Synchro Pair training. Systerston is currently being assessed as part of the Team's contingency planning against the potential loss of EG R313.
29	16	CFL Derbyshire Flying Centre (Aviation Stakeholder)	No	Object	Object	Neutral		The RAF do not need Airspace over RAF Scampton and RAF Waddington. The imposition of Two areas of Airspace will seriously affect GA aviation safety in the Area.	If the MOD could keep all but essential activity above 5000ft Then GA aviation would have space for various operations.	If the MOD can consolidate operation days for efficiency. This would leave more time for other to engage in there various activities. With the benefit that the MOD would be making itself more efficiency minded.		X	Simultaneous use of EG R313 and Waddington proposed airspace RAFAT has provided further indications as to how the proposed airspace at RAF Waddington may be used alongside EG R313, depending on the viability of EG R313 for RAFAT practice displays. This is part of this document set at Annex B, but in summary there will be no requirement for the proposed airspace at Waddington and EG R313 to be activated on the same day for RAFAT activity. Therefore, a DACS through one or the other should be approved (dependent on any other conflicting airspace activity, of course). Should EG R313 be required for RAFAT whilst Waddington is active for Protector, a DACS through one or the other volumes of airspace will be available (dependent on any other conflicting airspace activity, of course).	
30												X	Consolidate operational flying days Whilst the Change Sponsor can see the merit in this, it would be difficult to manage in practice. During the work-up season RAFAT is likely to plan to fly every weekday in order to achieve its training objectives in time for the full display season. Protector will also be required to be flown to meet the training requirement of front line crews. Getting adequate time slots in shared training areas with other appropriate defence assets is key to achieve operational delivery and output for the MOD.	
31												X	The suggestion to keep all but essential MOD flying activity above 5000ft is outside the scope of this ACP.	
32	17	Individual	No	Strongly Object	Strongly Object	Strongly Object		It will be dangerous for all those living in the area as accidents are bound to happen especially on take off and landing RAF Waddington is a populated area surrounded by roads, a school, local housing and work places. Properly tested and approved safety measures have not been taken. There is a clear intention to grow and for training and use by other international militaries that will increase the level of flights and thus of danger. More importantly, this proposal is opening up the skies of the UK to large remotely controlled drones on a regular basis without a wide and properly informed public debate.	The only place that would genuinely reduce the impact to people in the UK would be to base these drones at sea, outside of shipping areas and not close to ports or fishing areas.	A major problem not just for the UK but for the whole world is the quantity of resources put into war rather than peace. Continuing the disastrous militarisation of our whole society will not help any of us. Demonstrating the 'other', making enemies rather than friends, opposing rather than cooperating, and supporting corporate control of our resources for a small global elite will continue to harm all people on our fragile planet. Therefore the MOD should be spending more time and resources considering real security and how to work with ALL nations and peoples to solve the existential crises facing us.		X	Use of drones The respondent has concerns about the future proliferation of drones in the UK and on the safety of drone activity. This does not impact the proposed airspace design.	
33												X	Safety of Protector activity The Change Sponsor provided information on the safety assurance of the Protector activity within the Consultation material. This can be found in the FAQs page uploaded to the Citizen Space portal (see Question 6).	
34	18	Individual	No	Strongly Object	Strongly Object	Strongly Object		No to drones. I'm not in support of more wars.	Don't have drones	No drones		X	Use of drones The respondent makes no comment regarding the proposed airspace design, but has concerns about the use of drones in general.	
35												X	Safety of Protector activity The Change Sponsor provided information on the safety assurance of the Protector activity within the Consultation material. This can be found in the FAQs page uploaded to the Citizen Space portal (see Question 6).	
36	19	Individual	No	Strongly Object	Strongly Object	Strongly Object		I am aware that all drones can and some have crashed. For this reason I do not believe that we should have armed drones flying over Britain, specially over urban areas. But anywhere as there are people living in rural areas. I am also aware that the larger drones will be seen as more aggressive and may lead to an unexpected more aggressive response or the outbreak of war. I believe we should avoid engaging in this development in this interests of our futures and our children's futures.		The result of crashes on the people living around.		X	Use of drones The respondent makes no comment regarding the proposed airspace design, but has concerns about the use of drones in general.	
37												X	Safety of Protector activity The Change Sponsor provided information on the safety assurance of the Protector activity within the Consultation material. This can be found in the FAQs page uploaded to the Citizen Space portal (see Question 6).	
38	20	Individual	No	Strongly Object	Strongly Object	Strongly Object		It's a question of control, we don't have armed police for a reason, the public does not want them, the principal here is the same, armed drones operated in secret by anonymous people making unaccountable decisions. I don't want to see this anywhere in Britain	Don't do it.			X	Use of drones The respondent makes no comment regarding the proposed airspace design, but has concerns about the use of armed drones in the UK.	
39	21	Aviation Stakeholder	No	Strongly Object	Strongly Object	Strongly Object		I'm a paraglider pilot. It will be almost impossible to fly any long cross country flights if this proposal goes ahead. Derbyshire and the Peaks are THE place in the UK to fly from for many people simly due to centres of population. Derbyshire is the biggest and most active club in the country. We are already very affected by Manchester, Birmingham and East Midlands air space plus some military bases to the north east and this proposal will close off a highly valued route to East Angles. Practicing acrobatics over the sea off Anglesey or off the East coast would seem like a better idea for the display team, the local inhabitants and us paragliders.	Practice when it is raining. Fly off shore or NE of Waddington Practice in the mornings. I our thermals don't really get going until 11:00 Practice when the wind is S, SE or E as we can't really get that way then especially if the wind is over 15mph.			X	Access to airspace The design principle "Minimise the impact to other airspace users" was afforded joint 3rd priority in Stage 1 of the ACP and the Change Sponsor is committed to make most efficient use of the proposed segregated airspace. The Change Sponsor also provided information on the mechanisms to be in place to minimise the impact on other airspace users within the Consultation material. This was published within the Consultation Document Issue 1.0 at para 4.1. The provision of a DACS whenever the proposed airspace is active will reduce the impact on the vast majority of air traffic operating in the area.	
40												X	Relocation of RAFAT flying display training area away from Waddington The Change Sponsor provided information regarding the basing of RAFAT at RAF Waddington. This can be found in the FAQs page uploaded to the Citizen Space portal (see Q12 & 13) and was published within the Consultation Document Issue 1 at para 1.19 and further in Annex A.	
41	22	Individual	Yes	Strongly Support	Strongly Support	Strongly Support	There are none we should welcome our drone defence team and the iconic red arrows to a base with such history	Not app.unable	None	Controlled access for residents to appreciate the operations on the base And the return of the WADDINGTON AIRSHOW		X	The respondent makes no comment regarding the proposed airspace design, but is supportive of the basing of RAFAT and Protector at Waddington.	
42	23	Individual	No	Strongly Object	Strongly Object	Strongly Object		It is one more step toward Armageddon. The USA is pushing the whole world into world war 3. It already, effectively, controls UK foreign policy and will indirectly control all activity at Waddington. Britain is under no threat whatsoever from any nation other than through association with the USA (disguised as NATO membership) or from the USA directly (if we ever had the temerity to choose a decent government). Every military adventure that British armed forces have ever instigated have been on foreign soil. Even ww2 was initiated on behalf of Empire and resulted directly from the Treaty of Versailles	No.	No.		X	Use of drones The respondent makes no comment regarding the proposed airspace design, but has concerns about the use of armed drones globally.	
43	24	Chair KESTEVEN MODEL FLYERS (Aviation Stakeholder)	No	Strongly Object	Strongly Object	Strongly Object	Do not support due to the proposal being some five to six nautical miles out. We run a model aircraft club just outside the village of Welbourn and have been there for the last 21 years. We fly models up to 7.5KG and above 400ft as per article 16 with the BMFA. The Options 1&2 finish right on our flying limit and so in theory would allow us to continue unhindered, but it does raise safety questions if something did go wrong, and we found a model in your self imposed no fly zone! Options 3,4 & 5 will stop us flying altogether! We feel this is totally unacceptable! For us option 7 & 8 are the options that can not affect us, or you shorten the no fly zone down to 4 miles. I would have thought you will have a minimum height to fly at anyway of at least 3000ft due to members of public riding horses, our flying hours have been set up to allow for our neighbour to go out riding. Our location is - What three words, diverged,duos,surreal 53.080730,-0.574228 We allow for a 600m radius from the centre for the take off point. Please contact me to discuss, we will try and get to the consultation at Waddington on the 28/9 around 4PM. Kind Regards, Terry	Reduce the distance of the no fly zone, 5nm is a very long way out! You can look at setting minimum height ie 5000ft at the 5nm and as you get closer to Waddington this can become less. This way low level operating aircraft such as light aircraft and model aircraft clubs can still operate, and never the two will mix.	Have you considered members of the public riding horses and dog walkers if you are going to be carrying out low level flying operations?	X	The Change Sponsor contacted the respondent prior to the Consultation drop in events to draw attention to the fact that the MOD had rejected all but the 5NM radius option, consulting on a single airspace design option instead that would not unduly impact the Kesteven Model Flyers. The respondent was much relieved and did not feel it necessary to attend either of the live events. Access to airspace for impacted BMFA members / clubs As a result of engagement at one of the drop-in sessions, Waddington ATC has drafted a letter of agreement to enable Kesteven and other locally situated BMFA club's activity to operate with minimal disruption.			
44												X	Airspace Design Option suggestion The suggestion regarding a stepped airspace design had been considered by the Change Sponsor during Stage 2, but not taken forward due to Protector's flight profile when conducting automatic take-off and landing primarily. There had also been some stakeholder feedback which expressed a desire to keep the airspace design simple.	
45												X	Consideration for general public and animals The Change Sponsor notes the respondent's comment about consideration for the welfare of humans and animals with regard to low flying aircraft. As part of the regulatory process laid down in CAP1616, the Change Sponsor is required to consider any impact on noise as a consequence of the airspace change. The Change Sponsor provided information on the impact of noise by both RAFAT and Protector activity within the consultation material. This can be found in the Consultation Document Issue 1 (see paras 5.1, 5.9.1 & 5.9.4). More information can be found in the Full Options Appraisal which is on the CAA ACP Portal.	
46	25	Individual	No	Strongly Object	Strongly Object	Strongly Object		object to this proposal as I believe it will endanger airspace users, those living and working in the immediate vicinity of RAF Waddington and those beyond. Remotely controlled aircraft are dangerous and evidence shows that they are particularly prone to accident during take-off and landing. RAF Waddington is surrounded by housing, local businesses, a major road and a school.	There should be a proper national debate about the use of these systems or assessment of the wider risks of opening UK skies to BVLOS drones.			X	Use of drones The respondent makes no comment regarding the proposed airspace design, but has concerns about the use of drones in general.	

	A	B	C	D	E	F	G	H	I	J	K		L	M	N			
		Organisation / Stakeholder Type (Q4 - 7)	Support the ACP? (Q8)	Response to combined airspace design (Q9)	Response to low airspace design (Stage 2 Option 1) (Q10)	Response to medium airspace design (Refined Stage 2 Option 8) (Q11)	Alterations to Improve the Proposal (Q12)	Explanation of Objection to Proposal (Q13)	Proposed Mitigations or Alterations to the Proposal (Q14)	General Considerations (Q15)	Response may impact final proposal		Response does not impact final proposal	Change Sponsor Reasoning / Justification (You said, we did)				
											Impacted	Not Impacted						
1																		
2																		
47								It seems an unnecessary risk for this significant change – which for the very first time allows large uncrewed aircraft to operate beyond visual line of sight on a regular basis – to be based in a populated area. I also object as this change will enable large remotely controlled drones to fly within the UK before safety measures – such as properly tested and approved "Detect and Avoid" equipment – are in place. According to the consultation documents it is only a "working assumption" that DAA equipment will enable Protector to fly within Classes A and C airspace without restriction. At the same time, the consultation document makes clear that a proper and satisfactory argument that Protector can operate safely within the TRA has yet to be made by the Ministry of Defence. Separately, the Ministry of Defence have also made clear that they intend to open a training hub at RAF Waddington both for RAF crews to train on Protector but also for other international militaries to train to use similar uncrewed aircraft. While the consultation documentation suggests that Protector flights will initially be limited – with 1 or 2 aircraft in the air at any one time up to 3 times per week – this is clearly intended to grow and this will inevitably increase the safety risk. Finally, I also object to this change as it will allow large remotely controlled drones to fly within the UK on a regular basis without proper national debate about the use of these systems or assessment of the wider risks of opening UK skies to BVLOS drones.									X	Safety assurance for Protector's operation in UK airspace The Change Sponsor provided information on the safety assurance of the Protector activity within the Consultation material. This can be found in the FAQs page uploaded to the Citizen Space portal (see Question 6). All aircraft in military service are subject to a comprehensive safety approval that meets the same standard as its manned equivalent. This safety approval covers all aspects of design, maintenance, envelope, operation and training and is applicable to RPAS. In addition the Change Sponsor has provided a Safety Assessment for Protector activity in the Full Options Appraisal (see para 6) which can be found on the CAA ACP Portal. Specifically this document touches on the limited DAA capability that Protector will be equipped with when introduced into the UK. The respondent queries Protector's operation in classes A and C airspace as well as its operation in an active TRA. As stated in the consultation document a satisfactory argument must be made for an active TRA to be considered a safe environment for Protector operations. The document further stated that the upper limit of FL 195 for the medium design is predicated on this argument being made. The MOD Protector programme is progressing an airspace integration safety assessment (AISA) that will provide argument and evidence that Protector will be safe to operate and operated safely in UK airspace, which will include operation in classes A & C as well as in an active TRA. The AISA will be scrutinised by the MA, but responsibility for its acceptance rests with the military risk owner: the Aviation Duty Holder. The AISA will address operation in classes A and C airspace as well as its operation in an active TRA and sits outside the ACP; hence it is believed that these 2 concerns are out of scope of the ACP.
48																		
49	26	Aviation Stakeholder	No	Object	Strongly Object	Neutral		Airspace user below 500ft not considered: We already have a restriction area for 5km at runway ends and 3km at sides which has been safely protecting existing operations which includes the Ambulance etc. The proposed area includes many large populated areas of the Lincoln City and surrounding villages so the 500ft and below area for 15km Diameter will affect those airspace users and the 19500ft out to 18nm will affect Civil flying, Glider, paraglider clubs etc and is a really large affecting area. Noise impact: Night shift and irregular hours worker like night delivery drivers etc. The areas will be very much affected by noise and Nightshift workers will be sleep disrupted, we have a major NHS hospital in Lincoln City and Care home workers that live in these areas. Increased Air Pollution: Low level flying up to 6 times a day will increase air pollution in the surrounding areas. Safety: Low level flying over these populated villages and the City of Lincoln should be minimized to, Take-off and Landing and then away to non populated areas like Donna Nook etc. Environment: Increased noise and pollution levels of Low level flying will impact property resale values in these affected areas.	Keep existing no-fly area for outgoing and incoming aircraft safety. This will then not impact local existing airspace users, clubs and individuals that have and do enjoy the below 400ft airspace. Low level flying over these large populated villages and the City of Lincoln should be minimized to, Take-off and into upper airspace a.s.p. and Landing and then away to non populated areas like Donna Nook etc. This will lower noise and pollution impact on the area and increase safety.				X	The respondent is a BMFA member and attended one of the consultation drop-in sessions where his concerns were discussed with a MOD representative. Access to airspace for impacted BMFA members / clubs As a result of engagement at one of the drop-in sessions, Waddington ATC has drafted a letter of agreement to enable Kesteven and other locally situated BMFA club's activity to operate with minimal disruption.				
50	27	Individual	No	Object	Object	Object								X	No content other than objection			
51	28	Individual	No	Strongly Object	Strongly Object	Strongly Object		I object to this proposal as I believe it will endanger airspace users, those living and working in the immediate vicinity of RAF Waddington and those beyond. Remotely controlled aircraft are dangerous and evidence shows that they are particularly prone to accident during take-off and landing. RAF Waddington is surrounded by housing, local businesses, a major road and a school, it seems an unnecessary risk for this significant change – which for the very first time allows large uncrewed aircraft to operate beyond visual line of sight on a regular basis – to be based in a populated area. I also object as this change will enable large remotely controlled drones to fly within the UK before safety measures – such as properly tested and approved "Detect and Avoid" equipment – are in place. According to the consultation documents it is only a "working assumption" that DAA equipment will enable Protector to fly within Classes A and C airspace without restriction. At the same time, the consultation document makes clear that a proper and satisfactory argument that Protector can operate safely within the TRA has yet to be made by the Ministry of Defence. Separately, the Ministry of Defence have also made clear that they intend to open a training hub at RAF Waddington both for RAF crews to train on Protector but also for other international militaries to train to use similar uncrewed aircraft. While the consultation documentation suggests that Protector flights will initially be limited – with 1 or 2 aircraft in the air at any one time up to 3 times per week – this is clearly intended to grow and this will inevitably increase the safety risk. Finally, I also object to this change as it will allow large remotely controlled drones to fly within the UK on a regular basis without proper national debate about the use of these systems or assessment of the wider risks of opening UK skies to BVLOS drones.						X	Use of drones The respondent makes no comment regarding the proposed airspace design, but has concerns about the use of drones in general. Safety assurance for Protector's operation in UK airspace The Change Sponsor provided information on the safety assurance of the Protector activity within the Consultation material. This can be found in the FAQs page uploaded to the Citizen Space portal (see Question 6). All aircraft in military service are subject to a comprehensive safety approval that meets the same standard as its manned equivalent. This safety approval covers all aspects of design, maintenance, envelope, operation and training and is applicable to RPAS. In addition the Change Sponsor has provided a Safety Assessment for Protector activity in the Full Options Appraisal (see para 6) which can be found on the CAA ACP Portal. Specifically this document touches on the limited DAA capability that Protector will be equipped with when introduced into the UK. The respondent queries Protector's operation in classes A and C airspace as well as its operation in an active TRA. As stated in the consultation document a satisfactory argument must be made for an active TRA to be considered a safe environment for Protector operations. The document further stated that the upper limit of FL 195 for the medium design is predicated on this argument being made. The MOD Protector programme is progressing an airspace integration safety assessment (AISA) that will provide argument and evidence that Protector will be safe to operate and operated safely in UK airspace, which will include operation in classes A & C as well as in an active TRA. The AISA will be scrutinised by the MA, but responsibility for its acceptance rests with the military risk owner: the Aviation Duty Holder. The AISA will address operation in classes A and C airspace as well as its operation in an active TRA and sits outside the ACP; hence it is believed that these 2 concerns are out of scope of the ACP.			
52														X	Flying tempo of Protector at RAF Waddington The Change Sponsor is unable to comment on the future aspirations associated with a training hub for RPAS at RAF Waddington. The Change Sponsor provided information about Protector's flying tempo in the Consultation material. This was published within the Consultation Document Issue 1.0 at Section 4 Utilisation of Airspace. More information can be found in the Full Options Appraisal which is on the CAA ACP Portal. An estimate was provided for the first 6 months, out to first 24 months of Protector's in-Service activity with a forecast of up to 6 flights per week as the operation matures. It is also worth stressing that much routine training will be managed in a synthetic flying environment, using a bespoke simulator, as opposed to live flying training.			
53																		
54	29	Individual	No	Strongly Object	Strongly Object	Strongly Object	N/A	I have recently moved to the area, knowing there is an operating air base nearby which is fine. However having previously lived near where the red arrows practice the noise is unbearable. I work a mixture of early/late/night shifts, and practicing in the airspace nearby will disrupt my sleep when sleeping during the day. Even with windows shut the noise will still manage to disrupt this and will have an effect on me and my work. The airspace for them to practice should be as far away as possible to residential properties to manage the noise pollution caused by the aircraft's. Take off and landing noise, is quick and over within a couple of seconds however practice noise is constant.	N/A	Do not approve airspace for practicing.				X	Noise The Change Sponsor has noted the respondent's concerns about aircraft noise. As part of the regulatory process laid down in CAP1616, the Change Sponsor is required to consider any impact on noise as a consequence of the airspace change. The Change Sponsor provided information on the noise impact of both RAFAT and Protector activity within the consultation material. This can be found in the Consultation Document Issue 1 (see paras 5.1, 5.9.1 & 5.9.4). More information can be found in the Full Options Appraisal which is on the CAA ACP Portal.			
55	30	Individual	Yes	Strongly Support	Strongly Support	Strongly Support								X	No further content other than Support			
56	31	Individual	No	Strongly Object	Strongly Object	Strongly Object		Heighington has had AWACS for years, finally having a break from the constant roaring. The airspace should not be redesigned for a new nuisance for the substantial population that lives here.	Using less well populated areas in not over or near avoidable villages.					X	Noise As part of the regulatory process laid down in CAP1616, the Change Sponsor is required to consider any impact on noise as a consequence of the airspace change. The Change Sponsor provided information on the noise impact of both RAFAT and Protector activity within the consultation material. This can be found in the Consultation Document Issue 1 (see paras 5.1, 5.9.1 & 5.9.4). More information can be found in the Full Options Appraisal which is on the CAA ACP Portal.			
57	32		Yes	Support	Neutral	Support		I operate UAS commercially, in Lincoln, with current EG R313 and FRZ of Waddington & Scampton, flying is limited without coordination with Waddington/Scampton ATCs. If EG R313 remains operational, activation of the lower airspace at RAF Waddington 5 nm radius should be active by NOTAM so that more airspace isn't restricted for UAS flights.	Propose that low airspace is active by NOTAM when required and that access to airspace for UAS flight (for commercial jobs) is still granted with coordination with Waddington ATC				X	Access to airspace The respondent has concerns over gaining access to the proposed low airspace design. The design principle "Minimise the impact to other airspace users" was afforded joint 3rd priority in Stage 1 of the ACP and the Change Sponsor is committed to make most efficient use of the proposed segregated airspace. The Change Sponsor also provided information on the mechanisms to be in place to minimise the impact on other airspace users within the Consultation material. This was published within the Consultation Document Issue 1.0 at para 4.1. The provision of a DACS whenever the proposed airspace is active will reduce the impact on the vast majority of air traffic operating in the area. Notification of airspace activation The airspace will be activated by NOTAM which will be promulgated via the AIS website. This was stated as being the case in the Consultation material as below so does not impact the final proposal. The design principle "Minimise the impact to other airspace users" was afforded joint 3rd priority in Stage 1 of the ACP and the Change Sponsor is committed to make most efficient use of the proposed segregated airspace. The Change Sponsor also provided information on the mechanisms to be in place to minimise the impact on other airspace users within the Consultation material. This was published within the Consultation Document Issue 1.0 at para 4.1 (in particular para 4.1.2 specific that the airspace will be activated by NOTAM) as well as in the FAQ page on the Citizen Space portal (see Q3).				
58														X	The respondent has concerns over the existence of RAF Waddington in general - this sits outside the scope of the ACP Noise As part of the regulatory process laid down in CAP1616, the Change Sponsor is required to consider any impact on noise as a consequence of the airspace change. The Change Sponsor provided information on the noise impact of both RAFAT and Protector activity within the consultation material. This can be found in the Consultation Document Issue 1 (see paras 5.1, 5.9.1 & 5.9.4). More information can be found in the Full Options Appraisal which is on the CAA ACP Portal.			
59	33	Individual	No	Strongly Object	Strongly Object	Strongly Object		Too much noise and pollution. They're not essential by any means. The Red Arrows are a flying circus without Monty Python. If they have to practice do it over the North Sea, but they're an anachronism and need retiring. Pointless disruption to local residents. The noise has increased enormously in the past month. Why? I'd love RAF Waddington to be closed. Noise pollution. Air pollution.	Stop having planes flying in circles round and round for hours. RAF Waddington makes local residents more of a target. Increasing its use makes this worse.					X	The respondent has concerns over the existence of RAF Waddington in general - this sits outside the scope of the ACP Noise As part of the regulatory process laid down in CAP1616, the Change Sponsor is required to consider any impact on noise as a consequence of the airspace change. The Change Sponsor provided information on the noise impact of both RAFAT and Protector activity within the consultation material. This can be found in the Consultation Document Issue 1 (see paras 5.1, 5.9.1 & 5.9.4). More information can be found in the Full Options Appraisal which is on the CAA ACP Portal.			

1	2	34	Individual	No	Strongly Object	Strongly Object	Strongly Object	Alterations to Improve the Proposal (Q12)	Explanation of Objection to Proposal (Q13)	Proposed Mitigations or Alterations to the Proposal (Q14)	General Considerations (Q15)	Response may impact final proposal		Response does not impact final proposal	Change Sponsor Reasoning / Justification (You said, we did)
												Impacted	Not Impacted		
60									I do not support additional aircraft flying over the local area for noise reasons. I also do not support the increasing use of military drones.					X	Use of drones The respondent has concerns over the use of drones in general.
61														X	Noise As part of the regulatory process laid down in CAP1616, the Change Sponsor is required to consider any impact on noise as a consequence of the airspace change. The Change Sponsor provided information on the noise impact of both RAFAT and Protector activity within the consultation material. This can be found in the Consultation Document Issue 1 (see paras 5.1, 5.9.1 & 5.9.4). More information can be found in the Full Options Appraisal which is on the CAA ACP Portal.
62		35	Individual	No	Strongly Object	Strongly Object	Strongly Object		I object to this proposal because I think it will prove too dangerous for both airspace users and people on the ground in the affected areas. Drones are unreliable, and the fact that they are unmanned creates a far greater risk than with other aircraft. Safety measures are not in place for these large drones, and we have not been able to have a national debate concerning the use of them in our skies. A child in Pakistan is reported as saying, 'I like cloudy days because the drones can't fly'. Where they are used in other parts of the world, drones are threatening and create anxiety for innocent people, including children. We should not be doing that to anyone, not least the people of the UK.	No.	No.			X	Use of drones The respondent has concerns about the use of drones in general, calling for a national debate on their use.
63														X	Safety of Protector activity The Change Sponsor provided information on the safety assurance of the Protector activity within the Consultation material. This can be found in the FAQs page uploaded to the Citizen Space portal (see Question 6).
64		36	Aviation Stakeholder	No	Object	Support	Strongly Object		The medium airspace design, if a danger area, as contiguous with adjacent controlled airspace, would require civil traffic to be vectored away from it, including proximity to the existing broadcast SID route to the east. This would be wholly unacceptable as any new change should not force changes upon third parties. If the design is controlled airspace, a clearance will require to be issued, and if this is not by the relevant authority for existing adjacent airspace then procedures would be required to enable safe operations in the meantime of which there is no mention. Failing availability of a clearance, the assumption would be that the military controller would 'take 5' or operate in accordance with existing SCP in this area. However, given the medium option is above FL100 and all other traffic should be transponder equipped in this region, there should be no requirement for any medium airspace here at all.	There is no requirement to maintain R313 and a new lower airspace construct. The suggested frequency of operations for Protector clearly provides ample availability for sharing with RAFAT and this should therefore be done with the minimum volume possible - ie, a single shared volume.	Closing and moving R313 to the new proposed site would provide additional flexibility to outbound egc traffic routing to the west. As there would be a combined requirement for any new area for RAFAT and Protector, waddington should also expect increased requirement to potentially work egyd inbound training traffic depending on arrival direction.			X	Type of Airspace The Change Sponsor provided information regarding the current regulation regarding the operation of RPAS BVLOS in UK airspace and, therefore, the need for segregated airspace for Protector. This can be found in the Consultation document, Section 1 and specifically para 1.18. The Change Sponsor has also considered the type of airspace to be proposed as outlined in the consultation material (see Q2 in FAQ pages on Citizen Space portal). Working with National Air Traffic Services (NATS), the Change Sponsor aims to ensure that the application of the CAA's Special Use Airspace - Safety Buffer Policy for Airspace Design Purposes (dated 22 August 2014) can be met with suitable mitigations for Protector's operation both within the low and medium airspace designs, without the requirement for civil traffic to be vectored away. The Change Sponsor has considered the applicability of other airspace constructs in place of Danger Areas. The Stage 2A submission, which can be found on the CAA ACP portal, covers this at para 10. As stated in the Stage 2A submission, the most economical type of airspace to be implemented (in terms of hours of activation, access to airspace and manpower resource) would be segregated airspace in the form of a Danger Area. A Danger Area was considered to be the most suitable type of structure as the activities to be performed will not comply with rules of the air and, therefore, anything other than segregated airspace was not considered to be appropriate.
65														X	Simultaneous use of EG R313 and Waddington proposed airspace RAFAT has provided further indications as to how the proposed airspace at RAF Waddington may be used alongside EG R313, depending on the viability of EG R313 for RAFAT practice displays. This is part of this document set at Annex 8, but in summary there will be no requirement for the proposed airspace at Waddington and EG R313 to be activated on the same day for RAFAT activity. Therefore, a DACS through one or the other should be approved (dependent on any other conflicting airspace activity, of course). Should EG R313 be required for RAFAT whilst Waddington is active for Protector, a DACS through one or the other volumes of airspace will be available (dependent on any other conflicting airspace activity, of course).
66														X	Air Traffic Management outside proposed airspace The respondent also makes comment about the air traffic management of local military traffic patterns. This is outside the scope of the ACP, although it could be noted that with the establishment of the Terminal Air Traffic Control Centre (TATCC) at RAF Coningsby, a more centralised ATM approach within Lincolnshire is already in place.
67		37	Individual	No	Strongly Object	Neutral	Strongly Object		I am a local resident and the increase in noise pollution causes by the aircraft is too much. I work from home and the noise interrupts meetings regularly and makes it impossible to hold a conversation. The noise scares local animals and is making the area a worse place to live and raise a family. It disturbs children's naps and upsets them. The noise continues long after the aircraft have gone and resonates in the area because of how low they are flying whilst coming into land.	Move the active airbase to Scampton or another base away from civilians. Or make the air craft silent.	No		X	Noise As part of the regulatory process laid down in CAP1616, the Change Sponsor is required to consider any impact on noise as a consequence of the airspace change. The Change Sponsor provided information on the noise impact of both RAFAT and Protector activity within the consultation material. This can be found in the Consultation Document Issue 1 (see paras 5.1, 5.9.1 & 5.9.4). More information can be found in the Full Options Appraisal which is on the CAA ACP Portal.	
68														X	Relocation of RAFAT flying display training area away from Waddington The Change Sponsor also provided information regarding the basing of RAFAT at RAF Waddington. This can be found in the FAQs page uploaded to the Citizen Space portal (see Q12 & 13) and was published within the Consultation Document Issue 1 at para 1.19 and further in Annex A.
69		38	Individual	No	Strongly Object	Strongly Object	Strongly Object		I object to this proposal as I believe it will endanger airspace users, those living and working in the immediate vicinity of RAF Waddington and those beyond. Remotely controlled aircraft are dangerous and evidence shows that they are particularly prone to accident during take-off and landing. RAF Waddington is surrounded by housing, local businesses, a major road and a school. It seems an unnecessary risk for this significant change - which for the very first time allows large uncrewed aircraft to operate beyond visual line of sight on a regular basis - to be based in a populated area. I also object as this change will enable large remotely controlled drones to fly within the UK before safety measures - such as properly tested and approved 'Detect and Avoid' equipment - are in place. According to the consultation documents it is only a "working assumption" that DAA equipment will enable Protector to fly within Classes A and C airspace without restriction. At the same time, the consultation document makes clear that a proper and satisfactory argument that Protector can operate safely within the TRA has yet to be made by the Ministry of Defence. Separately, the Ministry of Defence have also made clear that they intend to open a training hub at RAF Waddington both for RAF crews to train on Protector but also for other international militaries to train to use similar uncrewed aircraft. While the consultation documentation suggests that Protector flights will initially be limited - with 1 or 2 aircraft in the air at any one time up to 3 times per week - this is clearly intended to grow and this will inevitably increase the safety risk. Finally, I also object to this change as it will allow large remotely controlled drones to fly within the UK on a regular basis without proper national debate about the use of these systems or assessment of the wider risks of opening UK skies to BVLOS drones	No, just don't do it. Drone warfare is deeply unethical and in this instance your plans are untested and a risk to stakeholders of all kinds			X	Duplicate of Serial 25 & 28 above. Use of drones The respondent makes no comment regarding the proposed airspace design, but has concerns about the use of drones in general.	
70														X	Safety assurance for Protector's operation in UK airspace The Change Sponsor provided information on the safety assurance of the Protector activity within the Consultation material. This can be found in the FAQs page uploaded to the Citizen Space portal (see Question 6). All aircraft in military service are subject to a comprehensive safety approval that meets the same standard as its manned equivalent. This safety approval covers all aspects of design, maintenance, envelope, operation and training and is applicable to RPAS. In addition the Change Sponsor has provided a Safety Assessment for Protector activity in the Full Options Appraisal (see para 6) which can be found on the CAA ACP Portal. Specifically this document touches on the limited DAA capability that Protector will be equipped with when introduced into the UK. The respondent queries Protector's operation in classes A and C airspace as well as its operation in an active TRA. As stated in the consultation document a satisfactory argument must be made for an active TRA to be considered a safe environment for Protector operations. The document further stated that the upper limit of FL 195 for the medium design is predicated on this argument being made. The MOD Protector programme is progressing an airspace integration safety assessment (AISA) that will provide argument and evidence that Protector will be safe to operate and operated safely in UK airspace, which will include operation in classes A & C as well as in an active TRA. The AISA will be scrutinised by the MAA, but responsibility for its acceptance rests with the military risk owner: the Aviation Duty Holder. The AISA will address operation in classes A and C airspace as well as its operation in an active TRA and sits outside the ACP; hence it is believed that these 2 concerns are out of scope of the ACP.
71														X	Flying tempo of Protector at RAF Waddington The Change Sponsor is unable to comment on the future aspirations associated with a training hub for RPAS at RAF Waddington. The Change Sponsor provided information about Protector's flying tempo in the Consultation material. This was published within the Consultation Document Issue 1.0 at Section 4 Utilisation of Airspace. More information can be found in the Full Options Appraisal which is on the CAA ACP Portal. An estimate was provided for the first 6 months, out to first 24 months of Protector's in-Service activity with a forecast of up to 6 flights per week as the operation matures. It is also worth stressing that much routine training will be managed in a synthetic flying environment, using a bespoke simulator, as opposed to live flying training.
72		39	Aviation Stakeholder	No	Strongly Object	Strongly Object	Strongly Object	N/a	As a paramotor pilot, the area would significantly restrict my choice of flight options. The slow speeds of a paramotor practically remove the option of flying around the proposed areas to cross, and radio to / from is often not reliable with background noise of the motor etc. While selecting where to base the military areas already suitable would, I assume make more sense?	find a location already acceptable to the operation of the military equipment. While the Red Arrows are impressive, maybe it is time to remove them. Also, that are not an essential military activity, so should be considered in the same way a private club would apply?	No		X	Access to Airspace The respondent has concerns about the accessibility of the proposed airspace whilst he is flying his paramotor. The design principle "Minimise the impact to other airspace users" was afforded joint 3rd priority in Stage 1 of the ACP and the Change Sponsor is committed to make most efficient use of the proposed segregated airspace. The Change Sponsor also provided information on the mechanisms to be in place to minimise the impact on other airspace users within the Consultation material. This was published within the Consultation Document Issue 1.0 at para 4.1. The provision of a DACS whenever the proposed airspace is active will reduce the impact on the vast majority of air traffic operating in the area.	
73														X	Basing of RAFAT and Protector The Change Sponsor provided information regarding the basing of RAFAT at RAF Waddington within the Consultation material. This can be found in the FAQs page uploaded to the Citizen Space portal (see Q12 & 13) and was published within the Consultation Document Issue 1.0 at para 1.19 and further in Annex A. The Change Sponsor provided information regarding the basing of Protector at RAF Waddington within the Consultation material. This was published within the Consultation Document Issue 1.0 at para 1.14.
74														X	The final concern (categorisation of RAFAT is outside the scope of this ACP).

1	A	B	C	D	E	F	G	H	I	J	K	L	M	N
2		Organisation / Stakeholder Type (Q4 - 7)	Support the ACP? (Q8)	Response to combined airspace design (Q9)	Response to low airspace design (Stage 2 Option 1) (Q10)	Response to medium airspace design (refined Stage 2 Option 8) (Q11)	Alterations to Improve the Proposal (Q 12)	Explanation of Objection to Proposal (Q13)	Proposed Mitigations or Alterations to the Proposal (Q14)	General Considerations (Q15)	Response may impact final proposal		Response does not impact final proposal	Change Sponsor Reasoning / Justification (You said, we did)
											Impacted	Not Impacted		
75	40	Individual	No	Object	Object	Object		In Section 5 of the consultation document it states "that there will be no change to noise or air pollution for local communities as a result of this airspace change." The RAFAT doesn't currently operate/practise in airspace over Waddington so how can this be true? Moreover, in Section 5.9.1 it states "Noise - The Change Sponsor has assessed that the proposed change will not result in an increase in the number of aircraft operating in the local area, nor will the aircraft types be altered. Therefore, the same amount and type of noise is likely to impact the local population as is currently the case. Why is it that the Sponsor is "only responsible for assessing the consequential environmental impact on civil air traffic" (Options Appraisal Section 5.1)? Can the Sponsor therefore state why the training and operation of the Red Arrows is not considered an addition over and above current Base movements - they are not operating/practising overhead Waddington now or in my area? Is there an assumption being made by the Sponsor that RAFAT operations are exactly the same as the routine departures and arrivals currently operating from RAF Waddington? (In support of the above, I note that Section 4.6b states a potential for "3-6 display practices per day". That doesn't happen here now!)	No - although it is questionable that the operation of the RAFAT anywhere could be deemed "essential military activity".			X		Environmental impact CAP 1616 specifies (at para B42) that for proposals sponsored by the Ministry of Defence, the environmental impacts that are a direct result of military aircraft or military operations (including civil aircraft carrying out military function under contract) are not required to be considered or assessed. However, consequential environmental impacts from other airspace users (i.e. civil aviation) that are a result of the proposed change must be assessed. For example, if the proposed change is likely to have an effect upon General Aviation activity and/or traffic patterns, then environmental impacts from that effect (such as noise) need to be appropriately considered and assessed and reflected in consultation material. The Change Sponsor has complied with the regulation outlined in CAP 1616 Appendix B paras B42 - B43 (page 163) and assessed the consequential effects of the proposed airspace on civil traffic. Noise created by the Protector or RAFAT activity does not need to be assessed.
76	41	Individual	Yes	Strongly Support	Neutral	Object		You should have the freedom to do what you need to do without objection, if people don't like it, they can move.	As long as the air ambulance can operate its fine	No, go for it.			X	The respondent is supportive of the ACP and has only one concern regarding the ability for the air ambulance to be able to operate efficiently. The letter of agreement between Helimed and Waddington ATC is being reviewed by the relevant stakeholders to accommodate procedures to minimise the impact on air ambulance operations. This particular response did not impact the proposal; rather routine safety management procedures within MOD are the reason for the action to be carried out. Therefore, this has been marked as Response does not impact final proposal
77	42	Individual	No	Strongly Object	Strongly Object	Strongly Object		The droning noise that drones emit when sat in our garden or just being out and about in North Hylkeham. There is absolutely no reason for all these extra flights taking off from a heavily populated area. Extra Red Arrow, AWACS/or whatever the new ones are called) Drones and all the other air traffic. Trouble is that the vast majority of residents will only find out about the excess air traffic once it is up there. Just found out today 22/9 that there was a consultation yesterday 21/9 top secret obviously. It will be the same response as it was with the 40% uplift in trains cutting off the city centre, no one new about it!	Use a base near the coast, test over the north sea	All of the above			X	Noise As part of the regulatory process laid down in CAP1616, the Change Sponsor is required to consider any impact on noise as a consequence of the airspace change. The Change Sponsor provided information on the noise impact of both RAFAT and Protector activity within the consultation material. This can be found in the Consultation Document Issue 1 (see paras 5.1, 5.9.1 & 5.9.4). More information can be found in the Full Options Appraisal which is on the CAA ACP Portal.
78													X	Consultation The respondent has concerns about the noise produced by drones and an increase in the numbers of aircraft operating in the local area. He found out about the consultation on 22 September, the day after the first drop-in session, which he indicates was too late notice to participate. Whilst this might not have been convenient there was a second opportunity to participate in a live drop-in session on 28 September. The Change Sponsor had planned to provide up to six weeks' notice to interested stakeholders of the public drop-in sessions. Not only was this shortened by the period of national mourning following the death of Her Majesty Queen Elizabeth II, but the final approval of the consultation material had been delayed by 4 weeks due to unforeseen problems within the CAA and the timing of the Stage 3 Gateway. In all respects the Change Sponsor adhered to the previously approved consultation strategy and went ahead with the CAA's approval with regard to timelines. A reasonable turnout was achieved at the second session.
79													X	RAFAT and Protector flying tempo The Change Sponsor provided information about RAFAT and Protector's flying tempo in the Consultation material. This was published within the Consultation Document Issue 1.0 at Section 4 Utilisation of Airspace. More information can be found in the Full Options Appraisal which is on the CAA ACP Portal.
80	43	Individual	Yes	Strongly Support	Strongly Support	Strongly Support		I fully support all design stages, whilst there shall certainly be some changes to the area both immediately local and wider area, I am exceptionally					X	The respondent is supportive of the ACP and has no comments which would impact the proposal.
81	44	Individual	Yes	Strongly Support	Strongly Support	Strongly Support							X	The respondent is supportive of the ACP and has no comments which would impact the proposal.
82	45	Individual	Yes	Support	Support	Support		Would like to ensure that all major roads along the perimeter have double yellows to prevent persons stopping to view the red arrows practicing on the live highways (A608 A15) much they same as was outside Scampton to ensure safety of other road users.	reduce unless absolutely necessary flying in the night time hours 2200-0600hrs				X	Local community infrastructure (outside ACP scope) increased traffic congestion
83	46	Individual	Yes	Strongly Support	Strongly Support	Strongly Support							X	The respondent is supportive of the ACP and has no comments which would impact the proposal.
84	47	Aviation Stakeholder	Yes	Support	Support	Support							X	The respondent is supportive of the ACP and has no comments which would impact the proposal.
85	48	Individual	Yes	Strongly Support	Strongly Support	Strongly Support							X	The respondent is supportive of the ACP and has no comments which would impact the proposal.
86	49	Pointon and Boston Aviation Club (Aviation Stakeholder)	Yes	Support	Support	Support		At the Lincolnshire Air Users Group I asked the question concerning the transit height for the RAFAT Systerston and Donna Nook. The member representing RAFAT advised me it would be between 500 and 1500ft. For most pilots flying from Boston or Pointon it should provide little problem, more than enough time to climb above this altitude. I cannot comment on the reaction of those based at North Coates. When I do visit North Coates, it is very close to the boundary of Donna Nook and may be problematic to achieve adequate altitude for adequate separation.					X	Whilst the respondent's concerns do not specifically impact the final proposal, the Change Sponsor has the following response: A LARS service is provided by Humberstone that reaches the Donna Nook/North Coates area. RAFAT would always promulgate usage of Donna Nook via NOTAM and any formation would be in receipt of a air traffic service from Humberstone during the practice. North Coates have always suppressed their activity and/or warned local users of a practice display at Donna Nook. RAFAT would always ring North Coates before take-off to confirm timings.
87	50	Individual	No	Strongly Object	Strongly Object	Strongly Object		I object to this proposal as I believe it will endanger airspace users, those living and working in the immediate vicinity of RAF Waddington and those beyond. Remotely controlled aircraft are dangerous and evidence shows that they are particularly prone to accident during take-off and landing. RAF Waddington is surrounded by housing, local businesses, a major road and a school. It seems an unnecessary risk for this significant change - which for the very first time allows large uncrewed aircraft to operate beyond visual line of sight on a regular basis - to be based in a populated area. Separately, the Ministry of Defence have also made clear that they intend to open a training hub at RAF Waddington both for RAF crews to train on Protector but also for other international militaries to train to use similar uncrewed aircraft. While the consultation documentation suggests that Protector flights will initially be limited - with 1 or 2 aircraft in the air at any one time up to 3 times per week - this is clearly intended to grow and this will inevitably increase the safety risk.	No.	No.	X	Duplicate of Serial 25 & 28 & 38 above. Use of drones The respondent makes no comment regarding the proposed airspace design, but has concerns about the use of drones in general.		
88													X	Safety assurance for Protector's operation in UK airspace The Change Sponsor provided information on the safety assurance of the Protector activity within the Consultation material. This can be found in the FAQs page uploaded to the Citizen Space portal (see Question 6). All aircraft in military service are subject to a comprehensive safety approval that meets the same standard as its manned equivalent. This safety approval covers all aspects of design, maintenance, envelope, operation and training and is applicable to RPAS. In addition the Change Sponsor has provided a Safety Assessment for Protector activity in the Full Options Appraisal (see para 6) which can be found on the CAA ACP Portal. Specifically this document touches on the limited DAA capability that Protector will be equipped with when introduced into the UK. The respondent queries Protector's operation in classes A and C airspace as well as its operation in an active TRA. As stated in the consultation document a satisfactory argument must be made for an active TRA to be considered a safe environment for Protector operations. The document further stated that the upper limit of FL 195 for the medium design is predicated on this argument being made. The MOD Protector programme is progressing an airspace integration safety assessment (AISA) that will provide argument and evidence that Protector will be safe to operate and operated safely in UK airspace, which will include operation in classes A & C as well as in an active TRA. The AISA will be scrutinised by the MAA, but responsibility for its acceptance rests with the military risk owner: the Aviation Duty Holder. The AISA will address operation in classes A and C airspace as well as its operation in an active TRA and sits outside the ACP; hence it is believed that these 2 concerns are out of scope of the ACP.
89													X	Flying tempo of Protector at RAF Waddington The Change Sponsor is unable to comment on the future aspirations associated with a training hub for RPAS at RAF Waddington. The Change Sponsor provided information about Protector's flying tempo in the Consultation material. This was published within the Consultation Document Issue 1.0 at Section 4 Utilisation of Airspace. More information can be found in the Full Options Appraisal which is on the CAA ACP Portal. An estimate was provided for the first 6 months, out to first 24 months of Protector's in-Service activity with a forecast of up to 6 flights per week as the operation matures. It is also worth stressing that much routine training will be managed in a synthetic flying environment, using a bespoke simulator, as opposed to live flying training.
90	51	Director, Drone Wars (Aviation Stakeholder)	No	Strongly Object	Strongly Object	Strongly Object		We object to this proposal primarily on safety grounds. Drone Wars UK has tracked the safety record of large military UAVs for more than a decade (see https://dronewars.net/drone-crash-database/). While to some the use of remote-controlled UAVs appears to be becoming normalised, the reality is that the technology is far from mature and, as the data demonstrates, accidents occur frequently - around twice per month on average over the past decade (see Chris Cole, "Accidents Will Happen: A					X	Use of drones The respondent's concerns are largely to do with the safety of operating drones in the UK in general and at RAF Waddington and its local area in particular.

	A	B	C	D	E	F	G	H	I	J	K		L	M	N
		Organisation / Stakeholder Type (Q4 - 7)	Support the ACP? (Q8)	Response to combined airspace design (Q9)	Response to low airspace design (Stage 2 Option 1) (Q10)	Response to medium airspace design (Refined Stage 2 Option 8) (Q11)	Alterations to Improve the Proposal (Q12)	Explanation of Objection to Proposal (Q13)	Proposed Mitigations or Alterations to the Proposal (Q14)	General Considerations (Q15)	Response may impact final proposal		Response does not impact final proposal	Change Sponsor Reasoning / Justification (You said, we did)	
											Impacted	Not Impacted			
1															
2															
91								<p>review of military drones crashes', June 2019, Available at www.dronenews.net/wp-content/uploads/2019/06/DW-Accidents-WE8.pdf</p> <p>Importantly, there is no one particular reason for these accidents, meaning there is no simple technological fix. Losses occurred due to mechanical failure (such as tails shearing off or propellers snapping), electrical issues, communications problems (known as 'lost link'), engine failure (often due to oil or coolant loss), weather problems (including lightning strikes) and pilot error. Analysis of our dataset shows that 64% of accidents occurred mid-flight, while 28% occurred during the take-off and landing phase. We believe these proposed flights will endanger both airspace users and those living and working in the immediate vicinity of RAF Waddington. RAF Waddington is surrounded by housing, local businesses, a major road and a school. It seems an unnecessary risk for this significant change – which for the very first time allows large uncrewed aircraft to operate beyond visual line of sight on a regular basis – to be based in a populated area.</p> <p>While the MOD proposal says there is "a requirement for a large Remotely Piloted Air System (RPAS) to operate out of RAF Waddington from the mid-2020s", the reason for this is not spelled out. The RAF has been operating Reaper for more than a decade without a need to operate from RAF Waddington. While it may be more convenient for the RAF to locate Protector at Waddington along with other crewed STAR aircraft, other more remote locations may well prove to offer less risk given the safety record of large UAVs.</p> <p>We also object to this proposal as this change will enable large remotely controlled drones to fly within the UK before appropriate safety measures – such as properly tested and approved 'Detect and Avoid' equipment – are in place. According to the consultation documents it is only a "working assumption" that DAA equipment will enable Protector to fly within Classes A and C airspace without restriction. At the same time, the consultation document makes clear that a proper and satisfactory argument that Protector can operate safely within the TRA has yet to be made by the Ministry of Defence.</p> <p>Separately, the Ministry of Defence have also made clear that they intend to open a Protector training hub at RAF Waddington, both for RAF crews but also for foreign militaries. While the consultation documentation suggests that Protector flights will initially be limited – with 1 or 2 aircraft in the air at any one time – up to 3 times per week – this is clearly intended to grow and will inevitably increase the safety risk. It is inevitable that those who have less experience of flying a UAV are more likely to make mistakes, leading to accidents. Again we would argue that RAF Waddington, surrounded as it is by homes and businesses, is not the place for people to learn to fly this type of aircraft.</p> <p>Finally, we object to this change as it will allow large remotely controlled drones to fly within the UK on a regular basis without proper national debate about the use of these systems or assessment of the wider risks of opening UK skies to BVLOS drones.</p>					X	<p>Safety assurance for Protector's operation in UK airspace</p> <p>The Change Sponsor provided information on the safety assurance of the Protector activity within the Consultation material. This can be found in the FAQs page uploaded to the Citizen Space portal (see Question 6). All aircraft in military service are subject to a comprehensive safety approval that meets the same standard as its manned equivalent. This safety approval covers all aspects of design, maintenance, envelope, operation and training and is applicable to RPAS. In addition the Change Sponsor has provided a Safety Assessment for Protector activity in the Full Options Appraisal (see para 6) which can be found on the CAA ACP Portal. Specifically this document touches on the limited DAA capability that Protector will be equipped with when introduced into the UK. The respondent queries Protector's operation in classes A and C airspace as well as its operation in an active TRA. As stated in the consultation document a satisfactory argument must be made for an active TRA to be considered a safe environment for Protector operations. The document further stated that the upper limit of FL 195 for the medium design is predicated on this argument being made. The MOD Protector programme is progressing an airspace integration safety assessment (AISA) that will provide argument and evidence that Protector will be safe to operate and operated safely in UK airspace, which will include operation in classes A & C as well as in an active TRA. The AISA will be scrutinised by the MAA, but responsibility for its acceptance rests with the military risk owner: the Aviation Duty Holder. The AISA will address operation in classes A and C airspace as well as its operation in an active TRA and sits outside the ACP; hence it is believed that these 2 concerns are out of scope of the ACP.</p>	
92														X	<p>Flying tempo of Protector at RAF Waddington</p> <p>The Change Sponsor is unable to comment on the future aspirations associated with a training hub for RPAS at RAF Waddington. The Change Sponsor provided information about Protector's flying tempo in the Consultation material. This was published within the Consultation Document Issue 1.0 at Section 4 Utilisation of Airspace. More information can be found in the Full Options Appraisal which is on the CAA ACP Portal. An estimate was provided for the first 6 months, out to first 24 months of Protector's in-service activity with a forecast of up to 6 flights per week as the operation matures. It is also worth stressing that much routine training will be managed in a synthetic flying environment, using a bespoke simulator, as opposed to live flying training.</p>
93	52	Individual	No	Neutral	Neutral	Support		<p>whilst I do not support the proposal, it is solely down to the lateral limits of the RAFAT display teams approach to landing route. This is down to the fact that the larger aircraft previously operated from RAF Waddington go around the Branton village between Highburton and Washington. Having seen RAFAT and all of the smaller aircraft descend onto the approach - there appears to be a lack of consideration of local villages as they 'cut the corner' and transit directly over the villages. Thereby I object.</p>	Ensure that the landing approach route for the RAFAT team go around the village and not over it!				X	<p>The respondent has concerns about the final approach path taken by some aircraft (including RAFAT) to land on Waddington's RW2D. The Change Sponsor has passed the concerns to RAFAT and RAF Waddington for consideration, although it will not impact the final proposal.</p>	
94	53	Supporter of Drone Wars UK	No	Strongly Object	Strongly Object	Strongly Object		<p>I believe drones are a danger to civilians, are the beginning of perpetual warfare and do not reach the proposed target in most cases.</p>					X	<p>Use of drones</p> <p>The respondent has concerns about the operation of drones in general from a moral standpoint and has no impact on the final proposal.</p>	
95	54	Individual	No	Strongly Object	Strongly Object	Support		<p>The operation of the Red Arrows cannot realistically be described as essential military activity.</p>	<p>The RAF Aerobatic Team currently use an extraordinarily large amount of diesel fuel and chemical dyes to produce the smoke trails during displays. This is in addition to the jet fuel that is burnt in the engines.</p> <p>A freedom of information request (Ref: 2019/02712) dated 29 Mar 2019 describes the team using 643,000 litres of diesel and 36,000 litres of dye to produce the smoke trails during the financial year 2017/2018.</p> <p>Most other aerobatic display teams have switched to non-toxic aerobatic smoke oils which are more environmentally friendly. However, the red arrows continue to use diesel. From experience of living close to RAF Scampton the diesel oil smoke vapour coats all surfaces with an oily film and can be smelt in the air when practice displays are taking place.</p> <p>When are the Red Arrows planning to update their smoke apparatus to provide a (slightly) less environmentally damaging display?</p>			X	<p>Environmental impact of RAFAT flying</p> <p>The respondent has concerns about the environmental impact of RAFAT. Since RAFAT is moving its display flying training activity from RAF Scampton to RAF Waddington, no additional flying is anticipated from RAFAT and, therefore, the comment does not impact the final proposal.</p> <p>However, RAFAT has provided the following response which has been forwarded to the respondent individually. "Diesel is used primarily for flight safety but also adds to the visual spectacle of a display. This diesel is, however, atomised when injected into the hot exhaust gases. Coloured dye is only used later in training due to cost, and then for actual displays. It is not routinely used for the majority of training.</p> <p>The RAF takes its responsibilities in the area of sustainability very seriously. The Chief of the Air Staff has set the RAF the ambitious challenge of being climate change resilient and net-zero by 2040, with all indications pointing towards a requirement to get ahead of this at the earliest opportunity.</p> <ul style="list-style-type: none"> The Red Arrows display team fall within the RAF boundary and in direct response to the climate challenge, the team are actively working towards a reduced, or neutral, carbon footprint. Engaging with the RAF's Rapid Capabilities Office, industry partners and academia, work is currently taking place to reduce their carbon emissions and positively contribute toward the RAF's drive towards net-zero target. The Red Arrows carry out world-class displays at home and overseas, showcasing the excellence of the Royal Air Force and representing the United Kingdom. Shaping these performances, carried out since 1965, has been a culture of innovation – the journey towards a more sustainable output is a continuation of that pioneering spirit and this work is underway." 		
96	55	Aviation Stakeholder	No	Strongly Object	Strongly Object	Strongly Object		<p>Point 1 safety case</p> <p>From CAP1818</p> <p>a. No part of a current functional system may be changed until a valid safety case exists that shows that the safety risk will be acceptable according to valid risk criteria for the change.</p> <p>b. A safety case is: "a structured argument, supported by a body of evidence that provides a compelling, comprehensible and valid case that a [functional] system is safe for a given application in a given operating environment".</p> <p>The purpose of the impact analysis is to identify all POSSs whose existing assurance (arguments and evidence that their specifications are trustworthy) will be invalidated by the change, and hence establish the Scope of the change (see below).</p> <p>The purpose of the safety case is to convince the Service Provider that the proposed change will be safe and to communicate the reasons for that belief to an interested stakeholder e.g. directors and senior management, regulator, judicial review or court.</p> <p>Point 2 airspace modernisation</p> <p>CAP1711 airspace modernisation. There are many references to integration rather than segregation.</p> <p>For example</p> <p>"airspace modernisation is also expected to improve access to airspace for General Aviation, by enabling greater integration (rather than segregation) of different airspace user groups. The same is true for new airspace users such as drones and spacecraft."</p> <p>Point 3 air transport Act 2000 section 70</p> <p>https://www.legislation.gov.uk/ukpga/2000/38/section/70</p> <p>"[t]o facilitate the integrated operation of air traffic services provided by or on behalf of the armed forces of the Crown and other air traffic services;"</p> <p>It clearly requires integration not segregation.</p>	<p>Options</p> <ol style="list-style-type: none"> Done Integration. Relocation to an existing MOD site in day Scotland or Wales. 			X	<p>The Change Sponsor has been in contact with this respondent through the various stages of the ACP. They champion the requirement for a "safety case" and are supportive of the airspace modernisation strategy, both of which the Change Sponsor is aware and supports.</p> <p>Requirement for segregated airspace</p> <p>Whilst it is believed that the respondent's comments regarding drone/RAFAT integration v. segregation have no impact on the final proposal, the Change Sponsor makes the following points for clarification.</p> <p>As per Military Aviation Authority (MAA) regulations, the MOD is developing a Protector Air System Safety Case (ASSC). However, it is useful to distinguish between policy decisions, such as those made by the CAA, MAA and the Department for Transport and the MOD's responsibilities as the sponsor of an ACP. The Change Sponsor must comply with current policy and regulation relating to the activity to be undertaken, which it does. It is quite beyond both the Change Sponsor's control and the scope of this ACP to effect change in regulation or policy. Protector will be operated in accordance with MAA Regulatory Article (RA) 2320 – Role Specific requirements for RPAS, which states that Beyond Visual Line of Sight (BVLOS) operations should either employ an appropriately approved Detect And Avoid (DAA) capability to enable compliance with the Rules of the Air appropriate to the class of airspace, or be conducted within segregated airspace using a 'layered safety approach' – i.e. a range of measures to reduce the likelihood of loss of safe separation of the RPAS with other air users.</p> <p>With regard to the proposal to introduce segregated airspace for the RAFAT activity, the reasons for this were published in the Consultation Document at Annex A and in the Options Appraisal Phase II (Full) (see para 6.5) which are uploaded to both the CAA ACP portal and the Citizen Space portal.</p>		
97														X	<p>Relocation of both RAFAT and Protector from RAF Waddington</p> <p>The respondent also suggests relocation of Protector (and possibly RAFAT) away from RAF Waddington. The Change Sponsor provided information regarding the basing of Protector at RAF Waddington within the Consultation material. This was published within the Consultation Document Issue 1.0 at para 1.14. The Change Sponsor also provided information regarding the basing of RAFAT at RAF Waddington within the Consultation material. This can be found in the FAQs page uploaded to the Citizen Space portal (see Q12 & 13) and was published within the Consultation Document Issue 1.0 at para 1.19 and further in Annex A.</p>
98	56	Individual	No	Strongly Object	Strongly Object	Strongly Object		<p>killing people is morally and spiritually wrong and inconsistent with Christian Teaching and that of other faiths.</p>					X	<p>Use of Drones</p> <p>The respondent has concerns about the operation of weaponised drones in general from a moral/spiritual standpoint and has no impact on the final proposal.</p>	

1	2	A	B	C	D	E	F	G	H	I	J	K		L	M	N			
		Organisation / Stakeholder Type (Q4 - 7)	Support the ACP? (Q8)	Response to combined airspace design (Q9)	Response to low airspace design (Stage 2 Option 1) (Q10)	Response to medium airspace design (refined Stage 2 Option 8) (Q11)	Alterations to Improve the Proposal (Q 12)	Explanation of Objection to Proposal (Q13)	Proposed Mitigations or Alterations to the Proposal (Q14)	General Considerations (Q15)	Response may impact final proposal	Response does not impact final proposal	Change Sponsor Reasoning / Justification (You said, we did)						
												Impacted	Not Impacted						
		57	Aviation Stakeholder	No	Strongly Object	Strongly Object	Strongly Object		Inappropriate behaviour In making the following point I use the world of IFR flying as a broad parallel to BVLOS. My conventional world classifies aircraft as either. 1. Those types that will never be suitable for flight in IFR. (The 'flying flea' is an example) 2. Those types which can be flown IFR but are not suitably equipped. 3. Those types which can be flown IFR and are suitably equipped. The pilot must be suitably rated. If as a qualified IFR pilot was to approach the CAA and ask to fly a type 1 aircraft IFR, I would, quite rightly be given short shrift. If as a qualified IFR pilot was to approach the CAA and ask to fly a type 2 aircraft IFR, I'd be told to go away and equip it and come back when it's certified. I don't need to ask anyone whether I can jump in a type 3 aircraft and blat off into wild blue yonder in IMC. There would be not a cats chance in hades of getting a TDA to fly a type 1 or type 2 aircraft IFR. Both the CAA LAA MAA and DAA have existing processes for introducing new aircraft types and these should be agreed to. New aircraft types can be integrated into UK airspace quite quickly using these procedures	Mitigation. Learn from the LAAfor the introduction of new aircraft types. Learn from the French for the use of drones BVLOS into genology airspace					X				The respondent has already provided other comment at serial 56. The content of this response is targeted at the methods by which aircraft can be brought into service. This is outside the scope of an airspace change.
99		58	Individual	Yes	Strongly Support	Strongly Support	Strongly Support	No change's required.		No.	No.					X	The respondent is supportive of the ACP and has no comments which would impact the proposal.		
100		59	Chief Pilot National Grid Electricity Transmission (Aviation Stakeholder)	Yes	Neutral	Neutral	Neutral	National Grid helicopters may require access to lower airspace portion to inspect powerlines for routine or emergency patrols to maintain critical national infrastructure using flight profiles below 500ft agl at low speed/over in daylight hours. This will require permissive ATC co-ordination (DACs as per Options Appraisal Phase II 6.6&d) and a means of pre-booking into the airspace between or during activation times depending on the criticality of the inspection.	No opposition if access to airspace is reasonably provided during daylight activation times via the proposed DACs to provide deconfliction in the lower airspace portion for routine or emergency helicopter powerline inspections / fault-finding.	ATC co-ordination/hotline to enable routine and emergency access for helicopter powerline inspections. Ability to co-ordinate concurrent activity via ATC/DACS or avoidance of lengthy daylight activation periods to facilitate access for powerline patrols and provide 2-3hr windows where the airspace reverts to MATZ status.	ATC co-ordinated/preferential access to the airspace during activation times for TCAS or ADS-B Out equipped helicopters. Airspace users could notify intended use of the lower airspace portion via the CADS system. NOTAM action should be 48hrs in advance.	X				X	Access to airspace for National Grid The respondent is supportive of the ACP but has concerns about access to the proposed airspace for routing and emergency powerline inspections. The Change Sponsor acknowledges that delays in providing a DACS to this activity are likely to be greater when the proposed low airspace design is occupied by RAFAT activity. Waddington ATC reported that National Grid helicopters would be held outside the proposed low airspace design if it were active for RAFAT, since it would not be possible to ensure safe separation otherwise. As soon as practicable (i.e. safety entry would be approved. In this instance, the maximum period that an aircraft is likely to be held is 30 minutes. When the proposed airspace is active with Protector, access is likely to be easier since Protector will either need to take-off and climb above the height of the powerline inspection aircraft or complete its approach to land before access can be granted. Waddington ATC reported that ATC Co-ordinated access would be provided by the DACS service throughout to minimise the impact of the proposed airspace when it is active and maximise its flexible use. Waddington ATC has created procedures to ensure the maximum use of airspace below 500ft to limit the impact upon such essential movements.		
101												X					Use of CADS The Change Sponsor considered the respondent's suggestion for RAF Waddington to use CADS as a means of identifying when powerline and pipeline patrols are planned. Waddington ATC does not have access to CADS and it is thought that this would have resourcing implications, which would be disproportionate to the benefits involved. Protector activity is unlikely to have a significant impact on routine inspections and with tactical procedures in place should have no impact on emergency inspections. RAFAT activity at Waddington will affect powerline and pipeline patrols in the same manner as they currently do within EG R13. RAFAT has suggested a course of action which would be of benefit to the respondent which caters for inspections of an urgent nature. This has been presented to the respondent for consideration.		
102																	X	Notification of airspace activation In accord with routine flight planning procedures, Waddington Station Operations will promulgate the proposed airspace via the Military Airspace Management Cell prior to D-1 0900hrs local (i.e. at least 24hrs notice).	
103		60	Aviation Stakeholder	Yes	Strongly Support	Strongly Support	Strongly Support										X	The respondent is supportive of the ACP and has no comments which would impact the proposal.	
104		61	Individual	Yes	Support	Neutral	Neutral	As a resident who lives near RAF Waddington, the only concern I have safety, in the event of an aircraft coming down, other than that I am for this proposal									X	The respondent is supportive of the ACP but has concerns about safety and aircraft noise levels.	
105																	X	Safety of RAFAT activity The Change Sponsor provided information on the safety assurance of the RAFAT activity within the Consultation material. This can be found in the FAQs page uploaded to the Citizen Space portal (see Question 10) and was published within the Consultation Document Issue 1.0 at Annex A. In addition the Change Sponsor provides the following regarding RAFAT overflight. The majority of the aerobatic manoeuvring and training will occur directly overhead the WAD airfield boundary itself and mostly to the East in the least built up part of the airspace. The larger villages of Branton and Bracebridge Heath are on the edges of the aerobatic box and will seldom see aerobatic overflight below 500ft. Aerobatic flight below 500ft will not occur to the West of the airfield where the more BUAs exist (Hykeham, South Lincoln etc.). In addition RAFAT confirms that there would be no aerobatic overflight below 500ft of Harmston as the village is located just outside the main display area at RAF Waddington.	
106																	X	Safety of Protector activity The Change Sponsor provided information on the safety assurance of the Protector activity within the Consultation material. This can be found in the FAQs page uploaded to the Citizen Space portal (see Question 6).	
107																	X	Noise As part of the regulatory process laid down in CAP1616, the Change Sponsor is required to consider any impact on noise as a consequence of the airspace change. The Change Sponsor provided information on the noise impact of both RAFAT and Protector activity within the consultation material. This can be found in the Consultation Document Issue 1 (see paras 5.1, 5.9.1 & 5.9.4). More information can be found in the Full Options Appraisal which is on the CAA ACP Portal.	
108		62	Clerk to the Council Dunston PC (Local Authority Stakeholder)	Unsure	Neutral	Neutral	Neutral										X	The respondent is unsure as to their support for the ACP but has no comments which would impact the proposal.	
109		63	Aviation Stakeholder	No	Strongly Object	Strongly Object	Neutral		I fail to see why the existing minimum height rule of 500' agl has to be removed, surely this is a real reduction in safety measures.								X	The Change Sponsor is not clear about which "500ft rule" the respondent is referring to; moreover, the Change Sponsor is not removing any rules or regulations for operations in the proposed airspace. Both RAFAT and Protector's activities within the proposed airspace will be regulated by the MAA. Safety assurance for RAFAT and Protector's operation at RAF Waddington The Change Sponsor provided information on the safety assurance of both the RAFAT and Protector activities within the Consultation material. This can be found in the FAQs page uploaded to the Citizen Space portal (see Question 6) for Protector. Information on the safety assurance of RAFAT activity can be found in the FAQs page uploaded to the Citizen Space portal (see Question 10) and was published within the Consultation Document Issue 1.0 at Annex A. All aircraft in military service are subject to a comprehensive safety approval that meets the same standard as its manned equivalent. This safety approval covers all aspects of design, maintenance, envelope, operation and training and is applicable to RPAS. In addition the Change Sponsor has provided a Safety Assessment for both Protector and RAFAT activities in the Full Options Appraisal (see para 6) which can be found on the CAA ACP Portal. The Consultation Document Issue 1.0, Annex A outlines specifically how display activity (including practice displays) may be conducted and within the bounds of an (MAA or CAA) approved display area. In addition the Change Sponsor provides the following regarding RAFAT overflight. The majority of the aerobatic manoeuvring and training will occur directly overhead the WAD airfield boundary itself and mostly to the East in the least built up part of the airspace. The larger villages of Branton and Bracebridge Heath are on the edges of the aerobatic box and will seldom see aerobatic overflight below 500ft. Aerobatic flight below 500ft will not occur to the West of the airfield where the more BUAs exist (Hykeham, South Lincoln etc.). In addition RAFAT confirms that there would be no aerobatic overflight below 500ft of Harmston as the village is located just outside the main display area at RAF Waddington.	
110		64	Individual	Yes	Strongly Support	Strongly Support	Strongly Support	I'm very happy to back the opportunity for safer training of operators and pilots associated with any activities as required.	Not applicable	As the base already flies heavy jets and occasionally fighter jets, there does not need to be any further mitigation.	The only down-side to further operations is the traffic generated by extra personnel. Some of these personnel are already driving modified vehicles with very loud exhausts in the vicinity.						X	The respondent is supportive of the ACP and has no comments which would impact the proposal. Local community infrastructure (outside ACP scope) increased traffic congestion	
111		65	Individual	Yes	Strongly Support	Strongly Support	Strongly Support										X	The respondent is supportive of the ACP and has no comments which would impact the proposal.	

1	2	A	B	C	D	E	F	G	H	I	J	K		L	M	N
		Organisation / Stakeholder Type (Q4 - 7)	Support the ACP? (Q8)	Response to combined airspace design (Q9)	Response to low airspace design (Stage 2 Option 1) (Q10)	Response to medium airspace design (Stage 2 Option 2) (Q11)	Alterations to improve the Proposal (Q 12)	Explanation of Objection to Proposal (Q13)	Proposed Mitigations or Alterations to the Proposal (Q14)	General Considerations (Q15)	Response may impact final proposal	Response does not impact final proposal	Change Sponsor Reasoning / Justification (You said, we did)			
66	Individual	Yes	Strongly Support	Strongly Support	Strongly Support										X	The respondent is supportive of the ACP and has no comments which would impact the proposal.
67	Individual	No	Strongly Object	Strongly Object	Strongly Object										X	The respondent objects to the ACP but has no comments which would impact the proposal.
68	Individual	No	Strongly Object	Strongly Object	Strongly Object		Military drones are weapons of war outside the control of everyone except the military. They kill, maim and damage infrastructure (as in Ukraine as I write). Only peaceful uses of drones eg for agriculture and archaeology should be allowed. The use of drones is unaccountable, like so much other military activity.	Just don't use military drones.							X	Use of drones The respondent makes no comment regarding the proposed airspace design, but has concerns about the operation of military drones in general from a moral standpoint.
69	Individual	Yes	Support	Strongly Support	Support	Commit to a deactivation date for EG R313.									X	The respondent is supportive of the ACP and but would like a decision to be made to "deactivate" EG R313. This is outside the scope of the ACP.
70	CEO British Gliding Association (INATMAC Organisation)	No	Object	Object	Support		Low Design Activation Periods. The proposal states that: • The proposed airspace will not be permanently active; it will only be activated when RAFAT or Protector flying is due to take place. Proven procedures will be adopted to ensure that the airspace is activated and notified as and when required. This will involve appropriate NOTAM action being taken at least 24 hrs in advance. • To ensure minimum disruption to other airspace users a Danger Area Crossing Service (DACS) will be offered within any implemented airspace. This means that, even if the airspace has been notified as being active, it may be possible for both civil and military aircraft to transit through it under a clearance from either Waddington ATC. • RAF Waddington ATC will be manned at all times during RAFAT and Protector operations. Confirmation on the current status of the airspace will be available from other appropriate military ATC units... when Waddington ATC is closed. We note that the proposed airspace should be accessible via a DACS. From wider engagement, we understand that the military radar system brought into use in Lincolnshire has been specified to screen out slow moving traffic and, as a result, identifying some non-transponder equipped traffic is problematic. The resulting likelihood of a need for a procedural crossing for some airspace users is more complex for the controller and therefore likely to be denied as a matter of course. We would like to know how the proposer anticipates providing a reliable DACS service for slow moving non-transponder traffic. In the event of operations being cancelled during the period of the NOTAM, the proposed airspace will still be considered active by potential users of the airspace, Waddington ATC will be closed, and therefore access to the airspace is only possible by contacting an 'appropriate military ATC unit'. We believe that is an unreliable alternative. We suggest that in addition to notifying activation by NOTAM, an ATIS is established to permanently provide real time status of the proposed airspace. Significantly increased volumes of restricted airspace. The proposed Waddington lower airspace serves two purposes. It supports Protector operations and RAFAT practices, including corporate events. The RAF should be able to operate the RAFAT and Protector in one volume of shared airspace. We are aware that due to Duty holder concerns, elements of RAFAT practice cannot take place at Waddington. As a result, practice will take place in either R313 if it continues to be established and available to RAFAT, or in proposed airspace over another site (ref the RAF Syerston ACP), thus effectively doubling the airspace impact of RAFAT practice activity on other users. The decision-making that has resulted in the RAFAT moving to an unsuitable location is resulting in negative impacts on other airspace users. The MoD are pressing forward with ACPs to address currently unknown scenarios. We recognise that this wider issue of potentially doubled volumes of restricted airspace allocated for RAFAT use is not part of ACP 2019-18. Had that been so, we would have suggested that this proposal is paused until a decision is made regarding the future of R313. Movements at RAF Waddington. Activity information is an important part of any ACP. The proposal notes that the number of movements at Waddington in 2022 and going forward is likely to be 20% less than the 9000 experienced in 2021. Around 18% of those movements are practice diversion from other RAF airfields. Of the 5900 or so movements by RAF Waddington based aircraft, how many are associated with the RAF Waddington Flying Club operations?	For the reasons stated in para 13 above: 1. We would like to know how the proposer anticipates providing a reliable DACS service for non-transponder traffic. 2. We suggest that in addition to notifying activation by NOTAM, an ATIS is established to permanently provide real time status of the proposed airspace. 3. For reasons associated with this ACP, we suggest that this proposal is paused until a decision is made regarding the future of R313. 'General aviation' includes a broad range of activity from foot launching paragliders through to business jets. Clearly the main impact of the proposal is on recreational aviation, which has limited capability to route around airspace, and hence the need for real time awareness of activation of the proposed airspace. And in many cases, recreational aviation has to comply with 'over-controlling' which is a feature of engagement with military controllers in any class of airspace. The analogy of phones being distracting while driving applies equally to radios when pilots are concentrating on, for example, staying airborne in rising air. Any DACS arrangement needs to work with the needs of recreational pilots and hence our request for more information on that topic. Planning ahead is an important part of flying. Knowing that a portion of airspace is available through listening to an ATIS service will be more useful than hoping a military controller is a. available and b. has the current information regarding the current status of the proposed airspace.			X	Access to airspace Response from the Lincolnshire TATCC ref DACS to slow-moving, non-transponder aircraft: The MOD views a DACS for slow moving aircraft as no different to how a MATZ / ATZ crossing would currently be facilitated. After obtaining the intended route and height / altitude, the airspace would be blocked off appropriately to allow the crossing to go ahead. For extra awareness ATCOs may ask the pilot to report overhead significant areas so that their progress could be tracked through the crossing. One factor to preclude a DACS from being approved for slow moving aircraft, is the perceived time it would take to complete the crossings if the airspace would shortly be going "HOT". Pausing of ACP Regarding the suggestion of pausing the ACP pending a decision regarding the future of EG R313, the Change Sponsor has considered this, but is continuing with the ACP in order to meet the tight timescales for implementation of the proposed airspace in line with the Protector and RAFAT operational requirements. RAFAT has provided further indications as to how the proposed airspace at RAF Waddington may be used alongside EG R313, depending on the continued viability of EG R313 for RAFAT practice displays. This is attached to this document. Provision of ATIS-like facility The Change Sponsor has also considered the respondent's suggestion for the provision of an ATIS facility. For technical, regulatory and ATC workload reasons, the provision of a useful ATIS to broadcast real-time status of the proposed airspace is not considered possible. The MOD investigated the provision of such a service during the SkyGuardian deployment in 2021 and for the TDA which is currently in place at RAF Syerston. The aspiration to provide airspace users with a means to determine whether a piece of airspace is hot or cold is unmanageable from a resource/workload point of view and, therefore, has flight safety implications (RAF Waddington ATC has conducted a safety assessment into the amount of information that can safely and accurately be uploaded for transmission via ATIS). However, Waddington Radar will provide a DAAIS and DACS on the Waddington LARS frequency of 119.5MHz. In the event of a last minute cancellation of the airspace and Waddington Radar is not available, London Information will provide a DAAIS on 124.6MHz.				
71	[Redacted] (Aviation Stakeholder)	Yes	Neutral	Support	Neutral	I do not believe the proposal will adversely affect our operations out of Langar Airfield, but as a busy airfield with in excess of 7000 turboprop movements per year for parachute-dropping sorties, I am a little concerned with the growth of the airspace at Waddington. The low airspace option really doesn't change a lot for any GA operators, ourselves including, but the boundaries of the medium option (and thus the combined option) do come significantly closer to our area of operation than we would like. I am just wary of potential conflict at the airspace boundary. We already have issues with the East Midlands CTA boundary, whereby controllers are nervous if our aircraft approach the boundary.		I think we will need a letter of agreement between ourselves and Waddington to ensure that the controllers are content with our aircraft movements near the boundary of this airspace.				X	Requirement for Letter of Agreement / Review of Letter of Agreement Discussions within the Lincolnshire TATCC suggest that provided the Langar activity remains outside the proposed airspace, there is no requirement to amend current letter of agreement held between Langar and TATCC. All information regarding airspace activation, timings, frequencies etc will be included in the relevant NOTAM. Clarification may be sought by Langar through the ATC switchboard at the Lincolnshire TATCC or via the Waddington LARS frequency of 119.5MHz. Langar could request a DACS if access to the proposed airspace is of benefit to Langar aircraft. Respondent is content to continue without amendment.			
72	Aviation Stakeholder	No	Strongly Object	Strongly Object	Strongly Object		Two main points:- 1. RPAS - there is no actual NEED to operate a 'remote' system aircraft from RAF Waddington at all. The system is designed and has proven capable of being operated from a site far remote from the actual location of the flying vehicle. Therefore, there is NO NEED to have the flying vehicle actually located at RAF Waddington. I am a very local resident to RAF Waddington, my home village is under the flight-path of runway 20 departures/02 arrivals. The RPAS airspace proposal will put my location inside an ACTIVE DANGER ZONE, together with many hundreds of thousands of others around the Lincoln area. This, in itself, should be something to be alarmed about, with all other UK DANGER AREAS located either at coastal airfields or locations on shorelines (thereby allowing departure and operation over water) or in extremely sparsely populated locations (Otterburn, Spadeadam, Salisbury Plain etc.). I am also a locally based GA pilot, operating from Temple Bruer (an airfield with over 40 years continuous operation within Cranwell MATZ and alongside Waddington MATZ), which will now have operations severely hampered with this un-necessary proposal. 2. RAFAT -the move of the RAFAT to Waddington would seem extremely inappropriate, for the following reasons:- a) - Moving the location of operation, of up to nine fast jets, performing aerobatic manoeuvres over a considerably more heavily populated location goes directly against the RAF's published promise of enhancing public safety. This is further confirmed by the need to move certain specific manoeuvres to a totally different location (Syerston) and yet a further location for more training needs (Donna Nook). Such requirements clearly demonstrate that RAF Waddington is not the suitable base for RAFAT. b.) - the already un-acceptable plan to locate RPAS at Waddington would seem another wholly obvious reason for NOT co-locating a team of up to nine fast jets at the same location, thus combining two very non-standard types of aviation operations at the same location - either of which, alone, would require a special and specific (and totally different) airspace requirement. c.) - I am a locally based GA pilot, operating from Temple Bruer (an airfield with over 40 years continuous operation within Cranwell MATZ and alongside Waddington MATZ), which will now have operations severely hampered with this un-necessary proposal. The original suggestion of a 6 mile restricted area would have encompassed Temple Bruer entirely, however, even the proposed 5 mile restricted area still brings a very real fear of the team 'over-spilling' this suggested airspace. I have previous experiences of this happening when I based my aircraft at Sturgate airfield. On at least three occasions, I have been confronted with formations of Hawk jets overhead the Sturgate runway and airfield boundaries, well outside of R313.	Yes - for RPAS - move the flying activities to a remote and/or coastal located airfield (Aberporth, Macrihansh etc.) Yes - if the RAF continue to see the need of RAFAT, then a suggested base that does not come into such serious conflict with residents or existing operations that the training regime needs to be broken up amongst three different flying training sites is ridiculous and confirms, entirely, why Waddington is NOT SUITABLE. Yes - outlining very clearly to local population that they would be (almost uniquely for the UK) living inside an active DANGER AREA.			X	The respondent has concerns about the safe operation of RPAS and RAFAT at RAF Waddington and the local area. The Change Sponsor has addressed these themes within the consultation material and does not feel that this respondent's feedback can impact the final proposal. Safety assurance for RAFAT and Protector's operation at RAF Waddington The Change Sponsor provided information on the safety assurance of both the RAFAT and Protector activities within the Consultation material. This can be found in the FAQs page uploaded to the Citizen Space portal (see Question 6) for Protector. Information on the safety assurance of RAFAT activity can be found in the FAQs page uploaded to the Citizen Space portal (see Question 10) and was published within the Consultation Document Issue 1.0 at Annex A. All aircraft in military service are subject to a comprehensive safety approval that meets the same standard as its manned equivalent. This safety approval covers all aspects of design, maintenance, envelope, operation and training and is applicable to RPAS. In addition the Change Sponsor has provided a Safety Assessment for both Protector and RAFAT activities in the Full Options Appraisal (see para 6) which can be found on the CAA ACP Portal. The Consultation Document Issue 1.0, Annex A outlines specifically how display activity (including practice displays) may be conducted and within the bounds of an (MAA or CAA) approved display area. In addition the Change Sponsor provides the following regarding RAFAT overflight. The majority of the aerobatic manoeuvring and training will occur directly overhead the WAD airfield boundary itself and mostly to the East in the least built up part of the airspace. The larger villages of Branton and Bracebridge Heath are on the edges of the aerobatic box and will seldom see aerobatic overflight below 500ft. Aerobatic flight below 500ft will not occur to the West of the airfield where the more BUAs exist (Hykeham, South Lincoln etc.). In addition RAFAT confirm that there would be no aerobatic overflight below 500ft of Harmston as the village is located just outside the main display area at RAF Waddington				
73	[Redacted] (Local Authority Stakeholder)	Yes	Neutral	Neutral	Neutral	No comments.	N/A	No comment.							X	The respondent has a neutral stance to the ACP and has no comments which would impact the proposal.

	A	B	C	D	E	F	G	H	I	J	K	L	M	N	
		Organisation / Stakeholder Type (Q4 - 7)	Support the ACP? (Q8)	Response to combined airspace design (Q9)	Response to low airspace design (Stage 2 Option 1) (Q10)	Response to medium airspace design (Refined Stage 2 Option 8) (Q11)	Alterations to Improve the Proposal (Q12)	Explanation of Objection to Proposal (Q13)	Proposed Mitigations or Alterations to the Proposal (Q14)	General Considerations (Q15)	Response may impact final proposal		Response does not impact final proposal	Change Sponsor Reasoning / Justification (You said, we did)	
											Impacted	Not Impacted			
1															
2															
74	Aviation Stakeholder	No	Support	Support	Neutral		As an aviation stakeholder I accept the proposed airspace design as the least worst option if the proposed location of RPAS at Waddington and the use of airspace over Waddington for RAFAT training and displays HAS to be implemented. Waddington, as an airfield immediately adjacent to a major city, cannot be the best location for these activities. The very nature of RPAS makes them eminently suitable for operation from remote, unpopulated areas. Logically, these systems should be located accordingly, for example RAF Valley within short distance of established Danger Areas designed for UAS operations. The repetitive flying of RAFAT over a built up area during training, practice or displays must be questioned from a safety and nuisance point of view. Again, other locations more suited to these activities are available. Earlier steps of this ACP do not seem to have offered any information on Risk Assessments or a Considered Safety Case relating to the proposals. It can be argued that RPAS are inherently less safe than conventional systems until proved otherwise and RAFAT history indicates an identifiable risk of a crash involving property or persons on the ground.	See above. Locate RPAT and RPAS elsewhere. This is not a NIMBY response. It is a genuine belief that other locations will meet the needs more effectively.	See above. Consider alternative locations.				X	Safety assurance for RAFAT and Protector's operation at RAF Waddington The Change Sponsor provided information on the safety assurance of both the RAFAT and Protector activities within the Consultation material. This can be found in the FAQs page uploaded to the Citizen Space portal (see Question 6) for Protector. Information on the safety assurance of RAFAT activity can be found in the FAQs page uploaded to the Citizen Space portal (see Question 10) and was published within the Consultation Document Issue 1.0 at Annex A. All aircraft in military service are subject to a comprehensive safety approval that meets the same standard as its manned equivalent. This safety approval covers all aspects of design, maintenance, envelope, operation and training and is applicable to RPAS. In addition the Change Sponsor has provided a Safety Assessment for both Protector and RAFAT activities in the Full Options Appraisal (see para 6) which can be found on the CAA ACP Portal. The Consultation Document Issue 1.0, Annex A outlines specifically how display activity (including practice displays) may be conducted and within the bounds of an (MAA or CAA) approved display area. In addition the Change Sponsor provides the following regarding RAFAT overflight. The majority of the aerobatic manoeuvring and training will occur directly overhead the WAD airfield boundary itself and mostly to the East in the least built up part of the airspace. The larger villages of Bramston and Bracebridge Heath are on the edges of the aerobatic box and will seldom see aerobatic overflight below 500ft. Aerobatic flight below 500ft will not occur to the West of the airfield where the more BUAs exist (Hykeham, South Lincoln etc). In addition RAFAT confirm that there would be no aerobatic overflight below 500ft of Harmston as the village is located just outside the main display area at RAF Waddington.	
126													X	Basing of RAFAT and Protector The Change Sponsor provided information regarding the basing of RAFAT at RAF Waddington within the Consultation material. This can be found in the FAQs page uploaded to the Citizen Space portal (see Q12 & 13) and was published within the Consultation Document Issue 1.0 at para 1.19 and further in Annex A. The Change Sponsor provided information regarding the basing of Protector at RAF Waddington within the Consultation material. This was published within the Consultation Document Issue 1.0 at para 1.14.	
127													X	Operations from local airfields Para 5.3 of the Consultation Document Issue 1.0 summarises the anticipated impact on other airspace users. The provision of a DACS is a key mitigation to reduce the impact on operators from local airfields along with minimising the activation periods.	
128													X	Simultaneous use of EG R313 and Waddington proposed airspace RAFAT has provided further indications as to how the proposed airspace at RAF Waddington may be used alongside EG R313, depending on the viability of EG R313 for RAFAT practice displays. This is part of this document set at Annex B, but in summary there will be no requirement for the proposed airspace at Waddington and EG R313 to be activated on the same day for RAFAT activity. Therefore, a DACS through one or the other should be approved (dependent on any other conflicting airspace activity, of course). Should EG R313 be required for RAFAT whilst Waddington is active for Protector, a DACS through one or the other volumes of airspace will be available (dependent on any other conflicting airspace activity, of course).	
129	75	Airspace Officer, Derbyshire Soaring Club (Aviation Stakeholder)	Unsure	Support	Support	Neutral			Our members pilot low performance soaring aircraft, without radio, or frequently, transponder capability. As such, any DACS arrangements are expected to be unavailable to us. As a result of this we are very concerned about the fact that this airspace proposal is being considered in isolation from any decision on the expected future Red Arrows practice area. If the Red Arrows retain their current practice area, unless operations of the new Waddington danger area and the Red Arrows practice area are deconflicted so they will not simultaneously be active, then there may be many days on which we have no possibility for cross country flights towards the east coast from our launch sites in the Peak District. We are therefore very interested in engaging on the operational design on this change to ensure these concerns are understood and considered.				X		
130	76	Individual	Yes	Strongly Support	Strongly Support	Strongly Support	The need for the RAFAT to operate over Waddington for its practice sessions are operationally, logistically and ecological sound. Operationally the teams training would less flight time rather than practicing over another airfield. Logistically you operate one airfield which is a huge cost saving. The current view place for aircraft enthusiasts is already in place. The amount of fuel saved by not having to transit to another airfield makes sense. Planning the other activities around the winter period can be managed in an operation room							X	The respondent is supportive of the ACP and has no comments which would impact the proposal.
131	77	Individual	Yes	Strongly Support	Strongly Support	Strongly Support	No alterations. Our armed forces need to fly.							X	The respondent is supportive of the ACP and has no comments which would impact the proposal.
132	78	Director Regulations, ARPAS UK (NATMAC Organisation)	Yes	Strongly Support	Strongly Support	Strongly Support	N/A	N/A	N/A	N/A				X	The respondent is supportive of the ACP and has no comments which would impact the proposal.
133	79	Individual	Yes	Strongly Support	Strongly Support	Strongly Support	None! Carry on!	N/A	N/A	N/A				X	The respondent is supportive of the ACP and has no comments which would impact the proposal.
134	80	Area Planning Officer, North Kesteven District Council (Local Authority Stakeholder)	Yes	Neutral	Neutral	Neutral			NKDC wishes to raise no objection to the Airspace Change Proposal and would welcome further consultation should the protected airspace, EG R313, above be withdrawn.				X	The respondent is supportive of the ACP and has no comments which would impact the proposal. The decision surrounding the fate of EG R313 and subsequent consultation is outside the scope of this ACP.	
135	81	Individual	Unsure	Neutral	Neutral	Neutral		With regard to the R313 airspace, there seem to be limited options to Scampton. I would propose the airspace over the old RAF Cottesmore airfield would be very suitable, and is retained Crown land. It is not far from Waddington for transit journeys.					X	Basing of RAFAT The Change Sponsor provided information regarding the basing of RAFAT at RAF Waddington within the Consultation material. This can be found in the FAQs page uploaded to the Citizen Space portal (see Q12 & 13) and was published within the Consultation Document Issue 1.0 at para 1.19 and further in Annex A	
136	82	Individual	Yes	Strongly Support	Strongly Support	Strongly Support								X	The respondent is supportive of the ACP and has no comments which would impact the proposal.
137	83	Aviation Stakeholder	Unsure	Object	Object	Object		I don't much fancy flying along coming face to face with one of these - probably armed drones. Seems crazy to me when you could fly them over the sea - Britain is after all surrounded by sea. Who will be responsible when it all goes wrong?	Yes Don't do it You already don't have enough pilots to fly the fast jets you have why add to the mess	Don't do it			X	Use of drones The respondent has concerns of a moral nature regarding the operation of drones. This is outside the scope of this ACP.	
138	84	Owner, Rectory Farm Airfield (Aviation Stakeholder)	No	Object	Object	Object	Concentration of RAFAT and remote piloted aircraft traffic at Waddington, together with the associated proposed satellite RAFAT training proposal for Syerston (ACP 2022-002) is an unreasonable burden to impose upon GA airspace users and residents in the area. It is important to realise that increasing the amount of controlled airspace to protect RAF asset activity comes at a direct cost of reduced safety for other airspace users.	It would be reasonable to look again at location for basing of remotely piloted aircraft for deployment from locations with lower airspace use than the busy N/S transit route in the East Midlands. RAFAT jet formation display training is inappropriate overhead local populated areas and especially above Lincoln city - there would be a significant safety gain by re-deploying this activity to less densely populated area.					X	The respondent has concerns over the impact of this ACP on other airspace users and on the safety aspects of flying Protector and RAFAT at RAF Waddington and the local area. Basing of RAFAT and Protector at RAF Waddington The Change Sponsor provided information regarding the basing of Protector at RAF Waddington within the Consultation material. This was published within the Consultation Document Issue 1.0 at para 1.14. The Change Sponsor also provided information regarding the basing of RAFAT at RAF Waddington within the Consultation material. This can be found in the FAQs page uploaded to the Citizen Space portal (see Q12 & 13) and was published within the Consultation Document Issue 1.0 at para 1.19 and further in Annex A	
139													X	Safety assurance for RAFAT and Protector's operation at RAF Waddington The Change Sponsor provided information on the safety assurance of both the RAFAT and Protector activities within the Consultation material. This can be found in the FAQs page uploaded to the Citizen Space portal (see Question 6) for Protector. Information on the safety assurance of RAFAT activity can be found in the FAQs page uploaded to the Citizen Space portal (see Question 10) and was published within the Consultation Document Issue 1.0 at Annex A. All aircraft in military service are subject to a comprehensive safety approval that meets the same standard as its manned equivalent. This safety approval covers all aspects of design, maintenance, envelope, operation and training and is applicable to RPAS. In addition the Change Sponsor has provided a Safety Assessment for both Protector and RAFAT activities in the Full Options Appraisal (see para 6) which can be found on the CAA ACP Portal. The Consultation Document Issue 1.0, Annex A outlines specifically how display activity (including practice displays) may be conducted and within the bounds of an (MAA or CAA) approved display area. In addition the Change Sponsor provides the following regarding RAFAT overflight. The majority of the aerobatic manoeuvring and training will occur directly overhead the WAD airfield boundary itself and mostly to the East in the least built up part of the airspace. The larger villages of Bramston and Bracebridge Heath are on the edges of the aerobatic box and will seldom see aerobatic overflight below 500ft. Aerobatic flight below 500ft will not occur to the West of the airfield where the more BUAs exist (Hykeham, South Lincoln etc). In addition RAFAT confirm that there would be no aerobatic overflight below 500ft of Harmston as the village is located just outside the main display area at RAF Waddington.	
140													X	Use of Syerston for RAFAT activity RAF Syerston is not a suitable site for a full RAFAT training programme due to its location in the Trent Valley Transit Area. This limits its use to the quieter winter months only. Also, to minimise the impact on local aviation, RAFAT will look to minimise its use to that which is deemed essential. As Syerston has a runway which is required for Synchro Pair training, they will focus on using it over the main formation. Also, it has limited vertical extent which really only makes it suitable for Synchro Pair training. Syerston is currently being assessed as part of the Team's contingency planning against the potential loss of EG R313.	

1	A	B	C	D	E	F	G	H	I	J	K		L	M	N
	Organisation / Stakeholder Type (Q4 - 7)	Support the ACP? (Q8)	Response to combined airspace design (Q9)	Response to low airspace design (Stage 2 Option 1) (Q10)	Response to medium airspace design (Refined Stage 2 Option 6) (Q11)	Alterations to Improve the Proposal (Q 12)	Explanation of Objection to Proposal (Q13)	Proposed Mitigations or Alterations to the Proposal (Q14)	General Considerations (Q15)	Response may impact final proposal	Response does not impact final proposal	Change Sponsor Reasoning / Justification (You said, we did)			
2											Impacted	Not Impacted			
141														X	Operations from local airfields Para 5.3 of the Consultation Document Issue 1.0 summarises the anticipated impact on other airspace users. The provision of a DACS is a key mitigation to reduce the impact on operators from local airfields along with minimising the activation periods.
142	85	Individual	No	Strongly Object	Strongly Object	Strongly Object	I oppose the proposal to fly armed drones within UK airspace due to the risk to communities and the creeping use of such vehicles for surveillance and security, which undermines our democracy and freedom. Drones have done immense harm around the world to communities in Pakistan, Yemen, Afghanistan, Somalia and elsewhere and there is not enough scrutiny about a largely secretive program that impacts negatively on the health and wellbeing of the men, women and especially children living beneath their constant presence. The proliferation of drones needs limiting, not expanding and we must not allow drones and autonomous vehicles to become a normalised presence in our airspace.	A full national debate on the subject and scrutiny as to safety measures, and the aims of the UK drone program.						X	Use of drones The respondent has concerns about the operation of drones in general from a moral standpoint and has no impact on the final proposal.
143	86	Individual	No	Strongly Object	Object	Object	I object to the whole premise that a requirement has been identified to base RPAS at RAF Waddington. A requirement may have been identified for the RAF to increase its RPAS capability but by its very nature Protector can be based anywhere and flown remotely as such no requirement for RPAS to be based at Waddington exists. The proposal underlines that gross diminishment of defence infrastructure and particularly, the lack of redundancy regarding RAF Stations and their valuable national asset runways. RAF Waddington is totally unsuitable as a base for both RPAS and the RAFAT being located in the most urban area of all RAF stations, with the exception of Northolt. It would seem to me that QinetiQ already have a presence at Benbecula and Aberporth and oversee the operation of EDG 701 which extends Westwards from North and South Uist for some 2000m which has no vertical limit. EDG201 extends 50m into the Irish sea from Aberporth again with no vertical limit. These environments are ideal and provide plenty of space in a very sparsely populated areas where the RAF could develop and operate its immature RPAS weapon system. Operating Protector from Waddington and placing the city of Lincoln in a danger area seems very arrogant, or at best as if it is being done to avoid creating postings, and the required infrastructure, at unpopular far flung but otherwise more suitable rural locations. If the UK wishes to have a RAFAT it needs to be properly funded, this includes the provision of a suitable airfield, suitable airspace and suitable new airframes. The Cranwell experiment never worked, the whole station breathed a huge collective sigh of relief when the team returned to Scampton. The team simply needs their own airfield to operate from. The idea of using Syerston and Donna Nook are flawed and highlight the RAF's own admission that Waddington's is unsuitable. The whole idea of moving the team to Waddington, was to allow continued access to the existing R313 at Scampton. With that option seemingly unavailable, Waddington should have immediately ceased to be seen as a potential base for the team. What safety study and criteria have been used and met prior to the move and by whom? The RAFAT have had numerous accidents during their history and managed to drop two Hawks onto the village of Welton following a mid air collision. Additionally they have destroyed numerous airframes and sadly killed team members during off season practice sorties, by looping rolling and flying serviceable aircraft into the ground.	Build some Family Quarters and base the engineering elements and RPAS airframes at a suitable rural coastal location. Wales and Scotland have existing airfields to do this. The RAFAT's display flying cannot be described as an essential military activity. They are the sole UK operator of Hawk T1 airframes, which were built between 1977 and 1982, making them older than the ill fated, former CFS Meteor and Vampire Vintage Pair. They represent yesterday's Airforce, flying yesterday's aircraft and seemingly, whilst on the ground and within the team environment, display questionable behaviour and yesterday's social attitudes. If a suitable airfield, airspace and new airframes are unaffordable, they should be disbanded.	Proposal? The RAFAT are already at Waddington. Ground has been broken with infrastructure already being designed and built for protector, with plans to have much greater levels of activity than originally proposed by providing airframes and training facilities for the forces of other nations. The whole consultation process seems to be a sham. The very unfortunate death of Her Majesty Queen Elizabeth II resulted in the public meetings at the Lincoln Guildhall on Sept 21st and the Redwood Drive Community Centre at Waddington on the 28th receiving virtually no public notification/advertisement of them happening at all. I am aware that only attendees of the Lincoln meeting, were the local media, a member of the RAF from Waddington and a representative from QinetiQ. The general public have no idea what is about to happen. The public meetings should have been postponed until it was possible for them to be effectively and vigorously advertised.				X	Relocation of both RAFAT and Protector from RAF Waddington The respondent also suggests relocation of Protector (and possibly RAFAT) away from RAF Waddington. The Change Sponsor provided information regarding the basing of Protector at RAF Waddington within the Consultation material. This was published within the Consultation Document Issue 1.0 at para 1.14. The Change Sponsor also provided information regarding the basing of RAFAT at RAF Waddington within the Consultation material. This can be found in the FAQs page uploaded to the Citizen Space portal (see Q12 & 13) and was published within the Consultation Document Issue 1.0 at para 1.19 and further in Annex A.	
144														X	Consultation Regarding the timing of the consultation drop-in sessions, the Change Sponsor had planned to provide up to six-weeks' notice to interested stakeholders of the public drop-in sessions. Not only was this shortened by the period of national mourning following the death of Her Majesty Queen Elizabeth II, but the final approval of the consultation material had been delayed by 4 weeks due to unforeseen problems within the CAA and the timing of the Stage 3 Gateway. In all respects the Change Sponsor adhered to the previously approved consultation strategy and went ahead with the CAA's approval with regard to timelines. A reasonable turnout was achieved at the second session.
145														X	Safety assurance for RAFAT and Protector's operation at RAF Waddington The Change Sponsor provided information on the safety assurance of both the RAFAT and Protector activities within the Consultation material. This can be found in the FAQs page uploaded to the Citizen Space portal (see Question 6) for Protector. Information on the safety assurance of RAFAT activity can be found in the FAQs page uploaded to the Citizen Space portal (see Question 10) and was published within the Consultation Document Issue 1.0 at Annex A. All aircraft in military service are subject to a comprehensive safety approval that meets the same standard as its manned equivalent. This safety approval covers all aspects of design, maintenance, envelope, operation and training and is applicable to RPAS. In addition the Change Sponsor has provided a Safety Assessment for both Protector and RAFAT activities in the Full Options Appraisal (see para 6) which can be found on the CAA ACP Portal. The Consultation Document Issue 1.0, Annex A outlines specifically how display activity (including practice displays) may be conducted and within the bounds of an (MAA or CAA) approved display area. In addition the Change Sponsor provides the following regarding RAFAT overflight: The majority of the aerobatic manoeuvring and training will occur directly overhead the WAD airfield boundary itself and mostly to the East in the east built up part of the airspace. The larger villages of Branton and Bracebridge Heath are on the edges of the aerobatic box and will seldom see aerobatic overflight below 500ft. Aerobatic flight below 500ft will not occur to the West of the airfield where the more BUAs exist (Hykeham, South Lincoln etc). In addition RAFAT confirm that there would be no aerobatic overflight below 500ft of Harleston as the village is located just outside the main display area at RAF Waddington.
146	87	Individual	No	Object	Object	Object	I object to this proposal as I believe it will endanger airspace users, people living and working in the immediate vicinity of RAF Waddington, and other people beyond. Remotely controlled aircraft are dangerous. Evidence shows that they are particularly prone to accident during take-off and landing. RAF Waddington is surrounded by housing, local businesses, a major road and a school.							X	Duplicate of Serial 25 & 28 & 50 above. Use of drones The respondent makes no comment regarding the proposed airspace design, but has concerns about the use of drones in general.
147	88	Individual	No	Strongly Object	Strongly Object	Strongly Object	Drones are dangerous weapons of war and have no place flying over civilian residential areas. These air craft are particularly prone to accidents during take off and landing which pose a risk to people's homes and communities. Once in the air, they pose a risk to other aircraft including civilian aircraft. I don't see any need for this proposal or benefit to anyone other than multinational arms companies.							X	Safety assurance for Protector's operation in UK airspace The Change Sponsor provided information on the safety assurance of the Protector activity within the Consultation material. This can be found in the FAQs page uploaded to the Citizen Space portal (see Question 6). All aircraft in military service are subject to a comprehensive safety approval that meets the same standard as its manned equivalent. This safety approval covers all aspects of design, maintenance, envelope, operation and training and is applicable to RPAS. In addition the Change Sponsor has provided a Safety Assessment for Protector activity in the Full Options Appraisal (see para 6) which can be found on the CAA ACP Portal. Specifically this document touches on the limited DAA capability that Protector will be equipped with when introduced into the UK. The respondent queries Protector's operation in classes A and C airspace as well as its operation in an active TRA. As stated in the consultation document a satisfactory argument must be made for an active TRA to be considered a safe environment for Protector operations. The document further stated that the upper limit of FL 195 for the medium design is predicated on this argument being made. The MOD Protector programme is progressing an airspace integration safety assessment (AISA) that will provide argument and evidence that Protector will be safe to operate and operated safely in UK airspace, which will include operation in classes A & C as well as in an active TRA. The AISA will be scrutinised by the MAA, but responsibility for its acceptance rests with the military risk owner: the Aviation Duty Holder. The AISA will address operation in classes A and C airspace as well as its operation in an active TRA and STs outside the ACP; hence it is believed that these 2 concerns are out of scope of the ACP.
148														X	Flying tempo of Protector at RAF Waddington The Change Sponsor is unable to comment on the future aspirations associated with a training hub for RPAS at RAF Waddington. The Change Sponsor provided information about Protector's flying tempo in the Consultation material. This was published within the Consultation Document Issue 1.0 at Section 4 Utilisation of Airspace. More information can be found in the Full Options Appraisal which is on the CAA ACP Portal. An estimate was provided for the first 6 months, out to first 24 months of Protector's in-Service activity with a forecast of up to 6 flights per week as the operation matures. It is also worth stressing that much routine training will be managed in a synthetic flying environment, using a bespoke simulator, as opposed to live flying training.
150	89	Individual	No	Object	Object	Object	Armed drones being used over civilian areas the U.K. should be banned. If they want to fly in military areas only, fine. At least piloted war planes are flown by pilots risking their own lives. These drones could crash Willy Nilly into civilian aircraft. Also if they malfunction and drop a missile there is no pilot to feel guilty.	No	Now					X	Use of drones The respondent has concerns about the operation of weaponised drones in general from a moral/spiritual standpoint and has no impact on the final proposal.
151	90	Individual						Have the area in the middle of nowhere.	Move it over the sea.					X	This is the second response by Respondent 90. Safety assurance for Protector's operation The Change Sponsor provided information on the safety assurance of the Protector activity within the Consultation material. This can be found in the FAQs page uploaded to the Citizen Space portal (see Question 6). All aircraft in military service are subject to a comprehensive safety approval that meets the same standard as its manned equivalent. This safety approval covers all aspects of design, maintenance, envelope, operation and training and is applicable to RPAS. In addition the Change Sponsor has provided a Safety Assessment for both Protector and RAFAT activities in the Full Options Appraisal (see para 6) which can be found on the CAA ACP Portal. Specifically this document touches on the limited DAA capability that Protector will be equipped with when introduced into the UK.
152			No	Strongly Object	Object	Object	Protected airspace is not enough. First the airspace needs to be above only uninhabited areas such as the sea. Second something must be done to ensure no civilian aircraft can enter the air space by mistake. Third, there needs to be a boundary safety zone as appropriate for the missile range of the drones.							X	Airspace management The Change Sponsor has outlined how the airspace will be managed in the Consultation Document Issue 1.0 para 4.1 and has provided a safety assessment for the proposed airspace in the Full Options Appraisal (see paras 6 & 7). Robot notification procedures will ensure that all airspace users should be aware of the status of the proposed airspace.
153	91	DAATM - 502 Airspace Plans, MOD (NATMAC Organisation)	Yes	Strongly Support	Strongly Support	Strongly Support	MOD response to stage 3 document sent directly to the sponsor via email.	MOD response to stage 3 document sent directly to the sponsor via email.	MOD response to stage 3 document sent directly to the sponsor via email.	MOD response to stage 3 document sent directly to the sponsor via email.				X	The respondent has collated comprehensive feedback from a range of internal MOD aviation stakeholders. In summary the respondent is supportive of the ACP and of the Low, Medium and Combined airspace designs. The feedback provided is being taken into consideration by the Change Sponsor during the development of ATC N119 and operating procedures for both Protector and RAFAT at RAF Waddington. The Change Sponsor is in direct contact with the respondent and potentially impacted internal MOD stakeholders during this process. A summary of some of the salient points is included below. DACS provision Provision of a DACS was thought to be of importance in order to effectively manage Quick Reaction Alert activity from RAF Coningsby, unplanned and planned military diversion requirements. DACS availability would alleviate potential issues with traffic funneling within the local area and would assist with military training in the Lincolnshire area and positioning for aircraft recoveries when Coningsby is using RW07. A DACS of the Medium airspace design was thought to be a significant enabler for military instrument departures from Cranwell and for Gamston/Lichfield radar corridor access on departure and recovery as well as airways joiner and leaver profiles for Cranwell aircraft. The Change Sponsor provided information on the MOD's intention to provide a DACS within the Consultation material. This was published within the Consultation Document Issue 1.0 at para 4.1.3.

1	2	A	B	C	D	E	F	G	H	I	J	K		L	M	N	
		Organisation / Stakeholder Type (Q4 - 7)	Support the ACP? (Q8)	Response to combined airspace design (Q9)	Response to low airspace design (Stage 2 Option 1) (Q10)	Response to medium airspace design (Refined Stage 2 Option 8) (Q11)	Alterations to Improve the Proposal (Q12)	Explanation of Objection to Proposal (Q13)	Proposed Mitigations or Alterations to the Proposal (Q14)	General Considerations (Q15)	Response may impact final proposal	Response does not impact final proposal	Impacted	Not Impacted	Change Sponsor Reasoning / Justification (You said, we did)		
154															X	Airspace notification Efficient notification of the proposed airspace was thought to be key in terms of period of notice of airspace activation as well as minimising the length of activation. It was thought that this would increase safety and enable other airspace users to plan around Protector and RAFAT activity to maximise the opportunities for obtaining crossing approvals. The Change Sponsor provided information on the MOD's intention to provide an efficient and robust notification system within the Consultation material. This was published within the Consultation Document Issue 1.0 at para 4.1.1 and 4.1.2. The Change Sponsor is developing procedures for the management of the proposed airspace, drafts of which will be included with the ACP submission at Stage 4.	
155												X				Requirement for Letter of Agreement / Review of Letter of Agreement Of particular relevance to RAFAT, the local military airspace users were keen to understand and influence RAFAT's pre-positioning procedures and emergency/break-off profiles to minimise any infringement of adjacent ATZ/MATZ airspace and to minimise the impact on local ATC patterns. The Change Sponsor has noted the suggestion of drawing up an internal MOD Service Level Agreement/Letter of Agreement between relevant units to determine priorities and develop procedures. Work on this has begun.	
156															X	Request for information The local units were keen to understand who would be the Control Authority for the proposed airspace, the likely duration of Protector sorties, whether Protector will be allocated an RPAS-specific squawk and whether it was necessary to activate the proposed airspace for the full sortie duration of Protector. These items have all been under discussion and the local units will be advised in due course in conjunction with the Change Sponsor via the respondent. The Change Sponsor is refining and documenting procedures for the management of the proposed airspace, drafts of which will be included with the ACP submission at Stage 4.	
157	92	Manager Technical and Operations, GATCO (NATMAC Organisation)	Unsure	Support	Support	Neutral	GATCO request confirmation that the medium airspace will not be used for any RAFAT or RPAS use, other than entry or exit from CAS. If the proposed medium airspace were to be used for other activities, we would like clarification that a buffer would exist and dimensions for such a buffer to provide separation from the contiguous CAS. GATCO would expect a safety argument to be developed and presented in this consultation material to show that the RPAS can remain within the danger area and therefore CAA Buffer Policy would not be required to be applied within the adjacent Lincolnshire CTAs when the danger area is activated. Without this safety case being presented, this proposal has a significant impact on GAT traffic flows within the Lincolnshire CTA and would impinge on traffic following ATIS route (G03), with traffic clearing MTMA and Leeds Bradford particularly affected. This would involve tactical ATC headings in order to avoid the area and associated buffer, which would put them head on to westbound traffic following ATIS route Y20 also inbound to MTMA/Leeds. This would increase Controller workload and have an impact on sector capacity, plus increase track miles for the aircraft concerned.	N/A	The suggested crossing service and limited activation seem sensible.	The new airspace would potentially create a significant increased workload for RAF Waddington Air Traffic Controllers, with the requirement to provide crossing services and co-ordinate or control Cranwell arrivals when these areas are activated and as identified by the consultation, due to funneling of traffic. Co-ordination workload between Coningsby and Waddington would also increase. What steps are being taken to manage this increased workload and to ensure that other traffic is not penalised if the Waddington controllers become too busy to offer the crossing service? Although not directly linked to the ACP, GATCO would like more information regarding how comms are maintained with the RPAS operator and ATC during entry into and transit through Controlled Airspace? RPAS inside controlled airspace would presumably be operating at a significant performance difference to other traffic, so GATCO would like clarification of any mitigations for potential workload issue for controllers with RPAS operating inside CAS. If it is not operationally sensitive information, we request the reason for the potential lack of full Detect and Avoid capabilities?	X				Safety Buffer Policy The respondent raised concerns regarding the operation of Protector within the Medium airspace design and requested clarity on how safety will be assured against traffic within the Lincs CTA. The Change Sponsor has been working with NATS regarding the operation of Protector within the Medium airspace design and has agreed appropriate mitigations that could be put in place prior to requesting dispensation from the safety buffer policy. Further information on this will be included with the ACP submission at Stage 4. The Change Sponsor is in close liaison of course with both the military and civilian airspace regulators as well as NATS. RAFAT will not use the Medium airspace design. The adherence to the safety buffer policy is an important item to address and whilst the MOD is already working on this, the comments made by the respondent are assessed to have a potential impact on the final proposal.		
158												X				ATC workload The MOD is completing its safety assurance associated with the introduction of both Protector and RAFAT into UK airspace in general and the Waddington area specifically. The MOD is developing procedures to enable maximum flexibility for ATC provision inside the proposed airspace, whilst minimising ATC workload. This will take the form of a series of internal MOD letters of agreement, drafts of which will be included with the ACP submission at Stage 4. ATC workload is an important item to address and whilst the MOD is already working on this, the comments made by the respondent have a potential impact on the final proposal.	
159															X	Request for information Whilst outwith the scope of the ACP, the Change Sponsor will engage directly with the respondent to address its request for information as listed under the "general considerations" tab and described as not directly linked to the ACP.	
160	93	Individual	No	Strongly Object	Strongly Object	Strongly Object	I object to this proposal as I believe it will endanger airspace users, those living and working in the immediate vicinity of RAF Waddington and those beyond. Remotely controlled aircraft are dangerous and evidence shows that they are particularly prone to accident during take-off and landing. RAF Waddington is surrounded by housing, local businesses, a major road and a school. It seems an unnecessary risk for this significant change - which for the very first time allows large uncrewed aircraft to operate beyond visual line of sight on a regular basis - to be based in a populated area. I also object at this change will enable large remotely controlled drones to fly within the UK before safety measures - such as properly tested and approved "Detect and Avoid" equipment - are in place. According to the consultation documents it is only a "working assumption" that DAA equipment will enable Protector to fly within Classes A and C airspace without restriction. At the same time, the consultation document makes clear that a proper and satisfactory argument that Protector can operate safely within the TRA has yet to be made by the Ministry of Defence. Separately, the Ministry of Defence have also made clear that they intend to open a training hub at RAF Waddington both for RAF crews to train on Protector but also for other international militaries to train to use similar uncrewed aircraft. While the consultation documentation suggests that Protector flights will initially be limited - with 1 or 2 aircraft in the air at any one time up to 3 times per week - this is clearly intended to grow and this will inevitably increase the safety risk. Finally, I also object to this change as it will allow large remotely controlled drones to fly within the UK on a regular basis without proper national debate about the use of these systems or assessment of the wider risks of opening UK skies to BVLOS drones.							X			Duplicate of Serial 25 & 28 & 38 & 50 & 87 above.
161															X	Use of drones The respondent makes no comment regarding the proposed airspace design, but has concerns about the use of drones in general.	
162															X	Safety assurance for Protector's operation in UK airspace The Change Sponsor provided information on the safety assurance of the Protector activity within the Consultation material. This can be found in the FAQs page uploaded to the Citizen Space portal (see Question 6). All aircraft in military service are subject to a comprehensive safety approval that meets the same standard as its manned equivalent. This safety approval covers all aspects of design, maintenance, envelope, operation and training and is applicable to RPAS. In addition the Change Sponsor has provided a Safety Assessment for Protector activity in the Full Options Appraisal (see para 6) which can be found on the CAA ACP Portal. Specifically this document touches on the limited DAA capability that Protector will be equipped with when introduced into the UK. The respondent queries Protector's operation in classes A and C airspace as well as its operation in an active TRA. As stated in the consultation document a satisfactory argument must be made for an active TRA to be considered a safe environment for Protector operations. The document further stated that the upper limit of FL 195 for the medium design is predicated on this argument being made. The MOD Protector programme is progressing an airspace integration safety assessment (AISA) that will provide argument and evidence that Protector will be safe to operate and operated safely in UK airspace, which will include operation in classes A & C as well as in an active TRA. The AISA will be scrutinised by the MAA, but responsibility for its acceptance rests with the military risk owner: the Aviation Duty Holder. The AISA will address operation in classes A and C airspace as well as its operation in an active TRA and sits outside the ACP; hence it is believed that these 2 concerns are out of scope of the ACP.	
163	94	CAA Accountable Manager, Wickenby Aerodrome (Aviation Stakeholder)	Unsure	Neutral	Neutral	Neutral							X			Requirement for Letter of Agreement / Review of Letter of Agreement RAF Waddington has a Letter of Agreement with Wickenby airfield, but sees no requirement for it to be amended due to this proposed change. Safe management of aerobatic activity at Wickenby is covered in the existing letter of agreement.	
164															X	Other items With respect to the respondent's statement that they are considering potential future introduction of Instrument Approach Procedure Outside of Controlled Airspace at Wickenby, the Change Sponsor is unrighted to any detail and would expect the respondent to have been in contact with Waddington ATC if this were in train. The Change Sponsor has responded directly to the respondent inviting them to provide more detail if available. T Regarding the 3rd comment "Wickenby Aerodrome is the base for flight training organisations and GA aircraft owners and operators. The aerodrome also hosts visiting GA aircraft. The MOD should have regard to this as part of it's ACP.", the Change Sponsor is aware of this current activity, which does not impact the ACP.	
165	95	Individual	Yes	Strongly Support	Strongly Support	Strongly Support									X	The respondent is supportive of the ACP and has no comments which would impact the proposal.	
166	96	Individual	No	Strongly Object	Strongly Object	Strongly Object	As a resident of nearby Coleby, currently the noise and disruption from RAF Waddington is just about tolerable. Any increase in local air traffic would be unbearable and would lead to significant decline in wellbeing, mental health and quality of life. At present, noise from RAF Waddington regularly disrupts day-to-day work, online and telephone meetings when working from home, despite having all windows and doors closed and having double glazing. The noise has disturbed rest and sleep during the daytime during times of illness, including while recovering from COVID. The noise causes distress to my pets when outside, and I expect to local wildlife. Any increase to frequency or levels of noise will cause significant distress to myself and other residents. Any increase in air traffic would mean increased danger of air collision. It is extremely unwise to increase air traffic over the built-up residential areas of Waddington and surrounding villages as this will lead to an increased threat to property and to life. I have been distracted myself my low-flying aircraft from RAF Waddington when driving on the A607 and I have passed several road traffic accidents shortly after low-flying aircraft above the road. Any increase in air traffic or low-flying aircraft will increase the risk of collision on nearby roads. Introducing different aircraft at RAF Waddington will lead to an increase of aircraft enthusiasts visiting the area, causing further congestion on the roads, including poor parking which disrupts residents and farm workers. Any increase in staff/personnel and their families based at RAF Waddington will increase pressure on local services and	I suggest the MOD consider utilisation of other airspace, away from built-up residential areas.	I suggest the MOD consider utilisation of other airspace, away from built-up residential areas.				X			Noise As part of the regulatory process laid down in CAP1616, the Change Sponsor is required to consider any impact on noise as a consequence of the airspace change. The Change Sponsor provided information on the noise impact of both RAFAT and Protector activity within the consultation material. This can be found in the Consultation Document Issue 1.0 at paras 5.1, 5.1.1, 5.1.2 & 5.1.4. More information can be found in the Full Options Appraisal which is on the CAA ACP Portal.	
167															X	Local community infrastructure (outside ACP scope) The concerns over road safety are outside the scope of this ACP.	

1	2	A	B	C	D	E	F	G	H	I	J	K		L	M	N
		Organisation / Stakeholder Type (Q4 - 7)	Support the ACP? (Q8)	Response to combined airspace design (Q9)	Response to low airspace design (Stage 2 Option 1) (Q10)	Response to medium airspace design (Refined Stage 2 Option 8) (Q11)	Alterations to Improve the Proposal (Q12)	Explanation of Objection to Proposal (Q13)	Proposed Mitigations or Alterations to the Proposal (Q14)	General Considerations (Q15)	Response may impact final proposal	Response does not impact final proposal	Change Sponsor Reasoning / Justification (You said, we did)			
168	97	Individual	No	Strongly Object	Strongly Object	Strongly Object	NA		As a resident of nearby Coleby, currently the noise and disruption from RAF Waddington is just about tolerable. Any increase in local air traffic would be unbearable and would lead to significant decline in wellbeing, mental health and quality of life. At present, noise from RAF Waddington regularly disrupts day-to-day work, online and telephone meetings when working from home, despite having all windows and doors closed and having double glazing. The noise has disturbed rest and sleep during the daytime during times of illness, including while recovering from COVID. The noise causes distress to my pets when outside, and I expect to local wildlife. Any increase to frequency or levels of noise will cause significant distress to myself and other residents. Any increase in air traffic would mean increased danger of air collision. It is extremely unwise to increase air traffic over the built-up residential areas of Waddington and surrounding villages as this will lead to an increased threat to property and to life. I have been distracted myself my low-flying aircraft from RAF Waddington when driving on the A607 and I have passed several road traffic accidents shortly after low-flying aircraft above the road. Any increase in air traffic or low-flying aircraft will increase the risk of collision on nearby roads. Introducing different aircraft at RAF Waddington will lead to an increase of aircraft enthusiasts visiting the area, causing further congestion on the roads, including poor parking which disrupts residents and farm workers. Any increase in staff/personnel and their families based at RAF Waddington will increase pressure on local services and infrastructure including schools and healthcare.	I suggest the MOD consider utilisation of other airspace, away from built-up residential areas.	I suggest the MOD consider utilisation of other airspace, away from built-up residential areas.			X	Relocation of both RAFAT and Protector from RAF Waddington The respondent also suggests relocation of Protector (and possibly RAFAT) away from RAF Waddington. The Change Sponsor provided information regarding the basing of Protector at RAF Waddington within the Consultation material. This was published within the Consultation Document Issue 1.0 at para 1.14. The Change Sponsor also provided information regarding the basing of RAFAT at RAF Waddington within the Consultation material. This can be found in the FAQs page uploaded to the Citizen Space portal (see Q12 & 13) and was published within the Consultation Document Issue 1.0 at para 1.19 and further in Annex A.	
169															X	Duplicate of Serial 96
170															X	Local community infrastructure (outside ACP scope) The concerns over road safety are outside the scope of this ACP.
171															X	Relocation of both RAFAT and Protector from RAF Waddington The respondent also suggests relocation of Protector (and possibly RAFAT) away from RAF Waddington. The Change Sponsor provided information regarding the basing of Protector at RAF Waddington within the Consultation material. This was published within the Consultation Document Issue 1.0 at para 1.14. The Change Sponsor also provided information regarding the basing of RAFAT at RAF Waddington within the Consultation material. This can be found in the FAQs page uploaded to the Citizen Space portal (see Q12 & 13) and was published within the Consultation Document Issue 1.0 at para 1.19 and further in Annex A.
172	98	Individual	Unsure	Neutral	Neutral	Neutral			Lack of available Environmental Impact Assessment and lack of equipment noise certification and assessment. If the change of use of an MOD site is not subject to CAA commercial noise requirements (https://www.caa.co.uk/Commercial-Industry/Aircraft/Airworthiness/Certificates-and-permits/Noise-certificates/Aircraft-noise-certificate/) what is the MoD equivalent to these standards and, should such a standard/policy exist, are the new platforms compliant? Would it be possible for this work to be made available publicly so the local communities have a level of assurance over noise control?	Has an environmental impact assessment been carried out for current use and proposed future use? I imagine legacy documents from Waddington and Scampton may support this work if they exist. Due to the change of use and type of operations there will inevitably be a change in the amount and type of noise the local community will be exposed to. What level of certification have platforms been subjected to and are they legally compliant with current noise certification standards. Has any consideration been made for the exposure of the local community to the more 'loitering' noise type? This was evident when the RPAS was flown from Waddington previously and on the arrival of the Red Arrows earlier this year.	Has an environmental impact assessment been carried out for current use and proposed future use? I imagine legacy documents from Waddington and Scampton may support this work if they exist. Due to the change of use and type of operations there will inevitably be a change in the amount and type of noise the local community will be exposed to. What level of certification have platforms been subjected to and are they legally compliant with current noise certification standards. Has any consideration been made for the exposure of the local community to the more 'loitering' noise type? This was evident when the RPAS was flown from Waddington previously and on the arrival of the Red Arrows earlier this year.			X	Environmental impact CAP 1616 specifies (at para B42) that for proposals sponsored by the Ministry of Defence, the environmental impacts that are a direct result of military aircraft or military operations (including civil aircraft carrying out military function under contract) are not required to be considered or assessed. However, consequential environmental impacts from other airspace users (i.e. civil aviation) that are a result of the proposed change must be assessed. For example, if the proposed change is likely to have an effect upon General Aviation activity and/or traffic patterns, then environmental impacts from that effect (such as noise) need to be appropriately considered and assessed and reflected in consultation material. The Change Sponsor has complied with the regulation outlined in CAP 1616 Appendix B paras B42 - B43 (page 163) and assessed the consequential effects of the proposed airspace on civil traffic. Noise created by the Protector or RAFAT activity does not need to be assessed.	
173	99	Parish Clerk, Coleby Parish Council (Local Authority Stakeholder)	Unsure	Neutral	Neutral	Neutral									X	Noise As part of the regulatory process laid down in CAP1616, the Change Sponsor is required to consider any impact on noise as a consequence of the airspace change. The Change Sponsor provided information on the noise impact of both RAFAT and Protector activity within the consultation material. This can be found in the Consultation Document Issue 1 (see paras 5.1, 5.9.1 & 5.9.4). More information can be found in the Full Options Appraisal which is on the CAA ACP Portal.
174															X	RAFAT activity over built up areas (BUA) The Change Sponsor provides the following regarding RAFAT overflight. The majority of the aerobatic manoeuvring and training will occur directly overhead the WAD airfield boundary itself and mostly to the East in the least built-up part of the airspace. The larger villages of Branton and Bracebridge Heath are on the edges of the aerobatic box and will seldom see aerobatic overflight below 500ft. Aerobatic flight below 500ft will not occur to the West of the airfield where the more BUAs exist (Hykeham, South Lincoln etc). In addition RAFAT confirm that there would be no aerobatic overflight below 500ft of Hamerton as the village is located just outside the main display area at RAF Waddington.
175	100	Individual	Yes	Strongly Support	Strongly Support	Strongly Support	None	None		Perhaps minimise throttle response for as far away from Waddington as possible	None				X	The respondent is supportive of the ACP and has no comments which would impact the proposal.
176	101	Individual	No	Strongly Object	Strongly Object	Strongly Object			As I live near to Waddington, the increased activity will undoubtedly cause an unacceptable increase in noise levels. Currently, the noise levels are unacceptable at times. In addition, with the increased activity, particularly with the Red Arrows, there is, as a consequence, an increased likelihood of accidents over the surrounding housing.	Keep the Scampton airspace open and carry out the training there.					X	Noise As part of the regulatory process laid down in CAP1616, the Change Sponsor is required to consider any impact on noise as a consequence of the airspace change. The Change Sponsor provided information on the noise impact of both RAFAT and Protector activity within the consultation material. This can be found in the Consultation Document Issue 1 (see paras 5.1, 5.9.1 & 5.9.4). More information can be found in the Full Options Appraisal which is on the CAA ACP Portal.
177															X	Safety assurance for RAFAT and Protector's operation at RAF Waddington The Change Sponsor provided information on the safety assurance of both the RAFAT and Protector activities within the Consultation material. This can be found in the FAQs page uploaded to the Citizen Space portal (see Question 6) for Protector. Information on the safety assurance of RAFAT activity can be found in the FAQs page uploaded to the Citizen Space portal (see Question 10) and was published within the Consultation Document Issue 1.0 at Annex A. All aircraft in military service are subject to a comprehensive safety approval that meets the same standard as its manned equivalent. This safety approval covers all aspects of design, maintenance, envelope, operation and training and is applicable to RPAS. In addition the Change Sponsor has provided a Safety Assessment for both Protector and RAFAT activities in the Full Options Appraisal (see para 6) which can be found on the CAA ACP Portal. The Consultation Document Issue 1.0, Annex A outlines specifically how display activity (including practice displays) may be conducted and within the bounds of an (MAA or CAA) approved display area. In addition the Change Sponsor provides the following regarding RAFAT overflight. The majority of the aerobatic manoeuvring and training will occur directly overhead the WAD airfield boundary itself and mostly to the East in the least built-up part of the airspace. The larger villages of Branton and Bracebridge Heath are on the edges of the aerobatic box and will seldom see aerobatic overflight below 500ft. Aerobatic flight below 500ft will not occur to the West of the airfield where the more BUAs exist (Hykeham, South Lincoln etc). In addition RAFAT confirm that there would be no aerobatic overflight below 500ft of Hamerton as the village is located just outside the main display area at RAF Waddington.
178															X	Retain use of EG R213 The option to retain EG R213 for RAFAT use is outside the scope of this ACP.
179	102	Individual	No	Strongly Object	Strongly Object	Strongly Object			ACP-2019-18 Gateway documentation Stage 2 Develop & Assess Para 14.3 States that "the Change Sponsor requests that formal noise modelling be scoped out of the airspace change requirement. Therefore, the Change Sponsor has not confirmed a noise modelling category for this ACP". A full assessment on the noise impact in the local area should be carried out.	Map ICAO noise certification requirements into MoD Policy	Surely the least the MoD can do for the local community is to carry out noise modelling before it commits to any change. I have previously submitted my concerns about noise in the local area on another feedback form prior to finding this statement in the documentation. The whole document pack has the underpinning assumption that RAFAT and Protector MUST be based at Waddington and pays lip service to the impact on the local community. These impacts should be fully assessed and understood before any decision is made. When was the last noise assessment carried in the local area of Waddington? I suspect it is out of date and did not include Sentinel R1, Shadow and Sentry operations and therefore is no basis to build on for the assumptions in this consultation.				X	Same respondent as Serial 98 Noise modelling The Change Sponsor has complied with the requirements of CAP 1616; the CAA accepted the rationale presented at Stage 2 of the ACP to scope out the requirement for noise modelling for this ACP as it was felt disproportionate to the impact created by the proposed change.
180	103	(Aviation Stakeholder)	Yes	Support	Support	Neutral		Please keep dimensions to lowest value required, as direct arrivals to Humber side from the South may be impacted, particularly when runway 02 in use.							X	ATC workload The Change Sponsor is unclear as to whose workload the respondent refers, but in the case of the MOD full safety work is being conducted within the military ATC units to ensure safety is assured from all aspects of the implementation of proposed airspace and the associated flying activities. Whilst ATC workload is an important item to address, the MOD was already working on this and so the comments here have not impacted the final proposal. If the respondent is referring to Humber side's ATC workload, then the Change Sponsor cannot make that assessment but has minimised the airspace dimensions to reduce the impact of all airspace users.
181															X	Minimise airspace dimensions The design principle "Minimise the impact to other airspace users" was afforded joint 3rd priority in Stage 1 of the ACP and the Change Sponsor is committed to make most efficient use of the proposed segregated airspace. Integral to this is the commitment to minimising volume and duration of activation; the Change Sponsor has worked hard with the manufacturer of Protector to minimise the volumes of airspace with regard to the low and medium airspace design options. The Change Sponsor also provided information on the mechanisms to be in place to minimise the impact on other airspace users within the Consultation material. This was published within the Consultation Document Issue 1.0 at para 4.1.

1	2	A	B	C	D	E	F	G	H	I	J	K		L	M	N
		Organisation / Stakeholder Type (Q4 - 7)	Support the ACP? (Q8)	Response to combined airspace design (Q9)	Response to low airspace design (Stage 2 Option 1) (Q10)	Response to medium airspace design (Refined Stage 2 Option 8) (Q11)	Alterations to Improve the Proposal (Q12)	Explanation of Objection to Proposal (Q13)	Proposed Mitigations or Alterations to the Proposal (Q14)	General Considerations (Q15)	Response may impact final proposal	Response does not impact final proposal	Change Sponsor Reasoning / Justification (You said, we did)			
											Impacted	Not Impacted				
104	Individual	No	Strongly Object	Strongly Object	Strongly Object		We live in Colby in line with end of the runway where planes both take off and land. Our concern is the risk when remote aircraft are flying overhead during take off and landing. We therefore object to this proposal.								X	Safety assurance for Protector's operation in UK airspace The Change Sponsor provided information on the safety assurance of the Protector activity within the Consultation material. This can be found in the FAQs page uploaded to the Citizen Space portal (see Question 6). All aircraft in military service are subject to a comprehensive safety approval that meets the same standard as its manned equivalent. This safety approval covers all aspects of design, maintenance, envelope, operation and training and is applicable to RPAS. In addition the Change Sponsor has provided a Safety Assessment for both Protector activities in the Full Options Appraisal (see para 6) which can be found on the CAA ACP Portal. Specifically this document touches on the limited DAA capability that Protector will be equipped with when introduced into the UK.
105	Individual	No	Object	Object	Object	I do not support it.	I object because it could endanger airspace users, both those living and working near RAF Waddington and those beyond. Remotely controlled aircraft are dangerous and evidence shows that they are particularly prone to accident - unspun around the world including in 2022. RAF Waddington is surrounded by housing, local businesses, a major road and a school. It is an unnecessary risk for this significant change - which for the very first time allows large aircraft without crew on board to operate beyond visual line of sight on a regular basis - to be based in a populated area. And although I live a bit further away, for the same reasons, I don't want remotely piloted aircraft flying over me. I'm aware, from the noise sometimes, that military aircraft fly over the city in which I live, so no matter how high they are flown, they pose a risk until they are shown to have a 100% safety record, so ask me again in 10 years time. My city, Peterborough is close to the edge of the 'potentially affected area' although I consider the whole of the UK could be affected at some point.	The MOD should not regard flying remotely piloted aircraft as essential activity. Therefore my opposition would be resolved if they stopped flying them. I would also like to see more scrutiny of the operations, including the training ones, preferably by Parliament and local authorities in the Waddington area, but also by representatives of all the categories of people - including the general public - to whom you have opened this consultation. This consultation should not be the end of the discussion.	Whatever the outcome of this proposal, it should not set a precedent for the whole UK, for example if another base instead of RAF Waddington were to be considered in future. I am old enough to know that units get moved from time to time, therefore the MOD might want to try it somewhere else in future. That should require another consultation.				X	Use of drones The respondent makes no comment regarding the proposed airspace design but has concerns about the use of drones in general.		
106	Manager NATS Operational Policy, NATS (NATMAC Organisation)	Object	Object	Object	Object		NATS understands and supports the need for change outlined in this proposal which presents the MOD requirement to establish suitable airspace to support Defence operations and integration of new air platforms (Protector) into the UK airspace. However, the consultation proforma design and question set presents a constraint to our response that forces a negative return. We are committed to working with MOD under the Joint and Integrated approach to ensure that a safe operating environment for all airspace users is maintained whilst allowing MOD to meet its operational needs. Unfortunately, for the reasons described below, NATS is currently unable to support this ACP due to the lack of information within the consultation document. It is difficult to see how this ACP, as presented, meets the primary design principle: 'DPA) Provide a safe environment for airspace users including consideration of the risk to life of those on the ground during RAFAT display practices'. The consultation document does not clearly provide the safety assurance argument for the airspace, especially in relation to UK Buffer Policy for Airspace Design and to substantiate the documents stated "working assumptions" for operations in airspace classes A-C. This lack of clarity does not allow NERL Operations to provide the safety assurance it requires to ascertain the full impact of the proposed airspace on its operation and customers. Specifically: Para 1.18 states: "The working assumption is that Protector will be able to fly within Classes A to C airspace without restriction". Whilst the premise of this ACP is based on this assumption, no further information or evidence is provided to quantify why this working assumption is valid or what steps are required to assure this desired outcome. Within Para 1.17 it clearly sets out that existing regulations prevent this working assumption from materialising. Consequently, the credibility of the remainder of the airspace consultation material is questionable. The "working assumption" to fly in Classes A to C airspace without restriction has been never documented within all documentation associated to this ACP; however, at the stage of consultation on the proposal no further details are provided. Further, Paras 1.4 and 1.5 explain the construct of airspace surrounding RAF Waddington, noting the presence of TRAs (between FL195 and FL245) and the ambiguous nature of the classification of such airspace (i.e. within Class C but Class G rules applying during activation times). The prevailing condition associated to TRAs is access for VFR traffic that are not required to be separated from other traffic law the requirements of Class C airspace, e.g. the same type of environment that this ACP aims to introduce a danger area into, to protect other airspace users due to the lack of detect and avoid capabilities. Consequently, any safety-based argument yet to be provided on flight within a controlled environment (Class A to C airspace) must also encompass the TRA environment which cannot be considered comparable. This element of the proposal is noted in Para 3.0; however, with the consultation concluding that no "satisfactory argument" for the safe operation of Protector has been provided for this environment, with the MOD noting that: "The upper limit of FL195 for the medium airspace design is predicated on this argument being able to be made". Therefore, at this stage of consultation, it must be concluded that such operations are not safety assured. NATS is the En Route ATS provider responsible for the provision of ATS with TRAs and therefore has a responsibility to ensure that such service provision is safe and commensurate with the rules provided by the CAA for its operation. In respect of the Low Area: Whilst a Danger Area requires compliance with the CAA SUA Buffer policy for HEM, a Restricted Area does not. In relation to this ACP, the selected use of a Danger Area to encompass RAFAT activities is a departure from the existing Restricted Airspace principle currently employed (EG313). A Restricted area infers that protection is required by RAFAT from other airspace users (which is also the case for display activities undertaken at various sites throughout the display season) i.e., RAFAT activities in themselves are not dangerous but the presence of other airspace users poses a risk to RAFAT and must therefore be restricted. However, a Danger Area implies that RAFAT activities are a danger to other airspace users and therefore must be contained and notified as such. By stating that RAFAT activities are dangerous to other airspace users the CAA's SUA Buffer Policy needs to be considered. It is assumed that the types of activity undertaken by RAFAT include "High Energy Manoeuvres" and therefore the policy would apply to the design and establishment of any area designated to contain such activities and thereby mitigate for the potential for "inadvertent excursions". Additionally, the design provided does not meet the requirements of the CAA's SUA Buffer Policy, in that a circle with a radius of 5nm centred on the Waddington ARP (53 09 58 18N 000 31 25 82W Centred on mid-point of Rwy 02/20) from SFC to FL105 is neither 5nm nor 2000ft from the Lincolnshire CT(A) which has a base level of FL105, or the Doncaster Sheffield CT(A) [3] which has a base level of FL085. The CAA's SUA Buffer Policy sets out how mitigations to the policy may be employed, however no mitigation information is provided within this consultation. Further, given the lower portion of airspace will also be used for Protector which is defined as an Unmanned Aircraft System Operating Beyond Visual Line of Sight (BVLOS), the CAA's SUA Buffer Policy would also apply to this type of activity. Again, the CAA's SUA Buffer Policy provides possible mitigations to overcome non-compliance with the design criteria, but there is no detail within the consultation document around utilisation of these potential options. In respect of the High Area: Within Para 3.9 the MOD accepts that the proposed design of the High Area does not comply with the CAA's SUA Buffer Policy, in that it immediately abuts the Lincolnshire CT(A) [4] base level FL105, CT(A) [5] base level FL125 and CT(A) [6] base level FL155. The MOD further acknowledges that: "Work is still ongoing regarding the development of a robust argument with respect to the CAA Safety Buffer Policy. If successful, the volume of the medium airspace design might be further reduced". As previously stated, the CAA's SUA Buffer Policy is predicated on the risk of "inadvertent excursion". Whilst NATS is mindful that the purpose of this ACP is to allow Protector to enter and exit Class C airspace above FL195 and therefore intentionally leave the danger area construct, it is also mindful that safety arguments to do so have not been provided and, as per para 1.17, it is not clear whether the MOD's own regulations currently allow such operations. Equally, as with the Low Area, the CAA's SUA Buffer Policy provides possible mitigations to overcome non-compliance with the design criteria, but there is no associated detail around utilisation of these potential options.	NATS would like to continue work with the MOD to ensure that the airspace and procedures to support Protector operations and to provide a safe environment for continued RAFAT training is enabled. To do this NATS would wish to understand: 1. The safety argument, and its acceptance by the CAA, for Protector operations without a full detect and avoid system within Classes A to C airspace, in order to validate the assumption that operating in Classes A-C is acceptable. 2. The Safety Argument, and its acceptance by the CAA, for Protector operations without a full detect and avoid system within an active TRA. 3. The Safety Argument/mitigations, and their acceptance by the CAA, for the containment of activities and the prevention of "inadvertent excursions" by RAFAT and Protector operations within the lower area (such that the CAA's SUA Buffer Policy for Airspace Design Purposes need not apply). 4. The Safety Argument/mitigations, and their acceptance by the CAA, for the containment of activities and the prevention of "inadvertent excursions" by Protector operations within the high area (such that the CAA's SUA Buffer Policy for Airspace Design Purposes need not apply).	If the assumption on operation within CAS can be validated, could the sponsor consider the application of other airspace constructs using Flexible Use of Airspace principles (FUA) such as a Control Area (CA) (see Airspace Modernisation Strategy intent) above RAF Waddington to support the operation on a timebound basis? This may negate the need for segregated airspace, comply with the buffer policy and provide a contiguous airspace environment.			X	The Change Sponsor has sent a full response directly to this respondent and is continuing to work closely with them. Safety assurance/argument for Protector's operation in UK airspace - classes A & C airspace NATS requested to understand more about: The Safety Argument, and its acceptance by the CAA, for Protector operations without a full detect and avoid system within an active TRA. Again the Change Sponsor does not believe that this airspace change relates to Protector's operation in classes A - C airspace and that this area of concern sits outside the ACP. Nevertheless, the Change Sponsor acknowledges that the means by which Protector will access, egress and interact with any NATS-controlled traffic in an active TRA is of significant interest to NATS. As stated in the Consultation Document a satisfactory argument must be made for an active TRA to be considered a safe environment for Protector operations. The document further stated that the upper limit of FL 195 for the medium design is predicated on this argument being made. MOD is working on a proposed way forward via the AISA which is likely to involve an airspace change to amend the current rules for TRAs, which will subsequently require approval by the CAA. No change to the proposed airspace under this ACP is anticipated. The AISA will address operation in classes A and C airspace as well as its operation in an active TRA and its outside the ACP; hence it is believed that these 2 concerns are out of scope of the ACP. NATS has accepted that this item is out of scope of the ACP. The respondent is a key stakeholder in development of the AISA. A full description of the MOD process to provision of a Safety Argument has been provided to the respondent separately.			
107	Individual	No	Object	Object	Object										X	Safety assurance/argument for Protector's operation in UK airspace - active TRAs The respondent is requested to understand more about: The Safety Argument, and its acceptance by the CAA, for Protector operations without a full detect and avoid system within an active TRA. Again the Change Sponsor does not believe that this airspace change relates to Protector's operation in an active TRA and that this area of concern sits outside the ACP. Nevertheless, the Change Sponsor acknowledges that the means by which Protector will access, egress and interact with any NATS-controlled traffic in an active TRA is of significant interest to NATS. As stated in the Consultation Document a satisfactory argument must be made for an active TRA to be considered a safe environment for Protector operations. The document further stated that the upper limit of FL 195 for the medium design is predicated on this argument being made. MOD is working on a proposed way forward via the AISA which is likely to involve an airspace change to amend the current rules for TRAs, which will subsequently require approval by the CAA. No change to the proposed airspace under this ACP is anticipated. The AISA will address operation in classes A and C airspace as well as its operation in an active TRA and its outside the ACP; hence it is believed that these 2 concerns are out of scope of the ACP. NATS has accepted that this item is out of scope of the ACP. The respondent is a key stakeholder in development of the AISA. A full description of the MOD process to provision of a Safety Argument has been provided to the respondent separately.
108	Individual	No	Object	Object	Object										X	Safety Buffer Policy - low airspace design NATS requested to understand more about: The Safety Argument/mitigations, and their acceptance by the CAA, for the containment of activities and the prevention of "inadvertent excursions" by RAFAT and Protector operations within the lower area (such that the CAA's SUA Buffer Policy for Airspace Design Purposes need not apply). The Change Sponsor agrees that the application of the CAA's Special Use Airspace - Safety Buffer Policy for Airspace Design Purposes (dated 22 August 2014) requires agreement with NATS for the low airspace design. A draft proposal for a request for dispensation from the policy has been shared with NATS for comment and is being progressed through a series of MOD/NATS meetings. NATS also stated that: "Whilst a Danger Area requires compliance with the CAA SUA Buffer policy for HEM, a Restricted Area does not. In relation to this ACP, the selected use of a Danger Area to encompass RAFAT activities is a departure from the existing Restricted Airspace principle currently employed (EG313). A Restricted area infers that protection is required by RAFAT from other airspace users (which is also the case for display activities undertaken at various sites throughout the display season) i.e., RAFAT activities in themselves are not dangerous but the presence of other airspace users poses a risk to RAFAT and must therefore be restricted. However, a Danger Area implies that RAFAT activities are a danger to other airspace users and therefore must be contained and notified as such." The respondent requested to understand more about: The Safety Argument/mitigations, and its acceptance by MOD does not consider RAFAT to propose a threat to external airspace users. In addition the Danger Area construct has been assessed by RAFAT as providing adequate protection for its flying display training. Since RAFAT was a late addition to this ACP, it was felt that proposing the Danger Area as dual purpose (RAFAT and Protector) would be less confusing and less restrictive to other airspace users than to propose both Restricted Area and Danger Area constructs for the same volume of airspace. In addition, MOD does not believe that Protector offers a threat to external airspace users; joint work managed by MOD/The respondent has been conducted into the likelihood of MOD BVLOS RPAS unintentionally departing notified operating airspace. A DASOR search found no instances of such in the UK. The MOD and NATS have agreed suitable mitigations to support a request for dispensation from the Safety Buffer Policy. A formal request for dispensation will be presented at Stage 4B with the ACP submission.

	A	B	C	D	E	F	G	H	I	J	K		L	M	N
1	Organisation / Stakeholder Type (Q4 - 7)	Support the ACP? (Q8)	Response to combined airspace design (Q9)	Response to low airspace design (Stage 2 Option 1) (Q10)	Response to medium airspace design (refined Stage 2 Option 2) (Q11)	Alterations to Improve the Proposal (Q 12)	Explanation of Objection to Proposal (Q13)	Proposed Mitigations or Alterations to the Proposal (Q14)	General Considerations (Q15)	Response may impact final proposal		Response does not impact final proposal		Change Sponsor Reasoning / Justification (You said, we did)	
2										Impacted	Not Impacted	Impacted	Not Impacted		
188											X				<p>Safety Buffer Policy - medium airspace design NATS also requested to understand more about: The Safety Argument/mitigations, and its acceptance by the CAA, for the containment of activities and the prevention of 'inadvertent excursions' by Protector operations within the high area (such that the CAAs SUA Buffer Policy for Airspace Design Purposes need not apply).</p> <p>The Change Sponsor agrees that the application of the CAA's Special Use Airspace - Safety Buffer Policy for Airspace Design Purposes (dated 22 August 2014) requires agreement with NATS for the medium airspace design. The MOD and NATS have agreed suitable mitigations to support a request for dispensation from the Safety Buffer Policy. A formal request for dispensation will be presented at Stage 4B with the ACP submission.</p>
189														X	<p>Type of airspace The respondent also asked "if the assumption on operation within CAS can be validated, could the sponsor consider the application of other airspace constructs using Flexible Use of Airspace principles (FUA) such as a Control Area (CTA) (see Airspace Modernisation Strategy intent) above RAF Waddington to support the operation on a time bound basis? This may negate the need for segregated airspace, comply with the safety buffer policy and provide a contiguous airspace environment."</p> <p>In this regard, the Change Sponsor certainly considered the use of other airspace constructs as an option and requested feedback on the suitability of using some form of controlled airspace during Stage 2 of the ACP. The Stage 2A submission covers this at para 10. The Consultation material provided an explanation of the current regulation regarding the operation of RPAS BVLOS in UK airspace and, therefore, the need for segregated airspace for Protector. This can be found in the Consultation document, Section 1 and specifically para 1.18. Whilst you suggest some kind of time-bounding for the promulgation of any proposed associated controlled airspace, the nature of RAFAT and Protector activity is likely to lead to unnecessary hours of activation and/or a lack in flexibility in the ability to operate the Protector capability when required. As stated in the Stage 2A submission, the most economical type of airspace to be implemented (in terms of hours of activation, access to airspace and manpower resource) would be segregated airspace in the form of a Danger Area. A Danger Area was considered to be the most suitable type of structure as the activities to be performed will not comply with rules of the air and, therefore, anything other than segregated airspace was not considered to be appropriate.</p>