

CAA Consultation Assessment

Title of airspace change proposal	Enabling RPAS and RAF Aerobatics Team Operations Out of RAF Waddington
Change sponsor	Ministry of Defence
Project reference	ACP-2019-18
Account Manager	[REDACTED]
Case study commencement date	24 April 2023
Case study report as at	7 August 2023

Instructions

In providing a response for each question, please ensure that the 'status' column is completed using the following options:

- YES
- NO
- PARTIALLY
- N/A

To aid the SARG Lead it may be useful that each question is also highlighted accordingly to illustrate what is:

resolved YES not resolved PARTIALLY not compliant NO

Executive Summary

The sponsor for this airspace change is the Ministry of Defence (MoD). RAF Waddington in Lincolnshire sits within Class G uncontrolled airspace. RAF Waddington is the hub of UK Intelligence, Surveillance, Target Acquisition and Reconnaissance (ISTAR) and the main operating base for airborne intelligence aircraft and systems. The MoD wish to establish a Danger Area (DA) to enable Beyond Visual Line of Sight (BVLOS) flying of a Remotely Piloted Air System (RPAS), Protector RG Mk1 between RAF Waddington and its operating and training areas in the UK, and to provide a volume of airspace for the Royal Air Force Aerobatic Team (RAFAT), better known as the Red Arrows, to access in order to conduct flying display training from 2023 due to the closure of their operating base at RAF Scampton. These two requirements were originally commenced by the MoD via separate airspace change proposals (ACPs) and proceeded as such until the conclusion of stage 1 CAP1616 for each. The MoD gained agreement from the CAA to combine both requirements within one airspace change and this took effect from stage 2 CAP 1616.

After stage 2 CAP 1616, the sponsor worked with Protector's manufacturer to refine the medium airspace design by reducing the volume of airspace, altering the lower level, and shifting it laterally. These refinements were made to take account of stage 2 feedback from aviation stakeholders and were explained within the sponsor's stage 3 consultation document.

The sponsor conducted a consultation over a period of 12 weeks on one airspace design option. This option comprised one design for the airspace in the vicinity of RAF Waddington Surface (SFC) up to Flight Level (FL) 105, known as the low airspace design, and one design for the airspace in the vicinity of RAF Waddington FL 105 to FL 195, aligned to and abutting the southern edge of the Lincolnshire Control Area (CTA), known as the medium airspace design. As such the design comprised two volumes of airspace, the lateral boundaries of which overlap, and which are vertically joined. The consultation material explained that the intention was for the low airspace design to be activated for both RAFAT and Protector activities and the medium design to be activated solely for Protector as it climbs into or descends from Class A and/or Class C airspace.

Although the sponsor determined that the airspace design did not require amendment on account of feedback, the sponsor has proposed mitigations to reduce the impact of the airspace when active.

PART A – Summary of Airspace Change Process to date	
A.1	Airspace change proposal public view (caa.co.uk)
A.2	Stage 1 DEFINE Gateway
A.2.1	The required documentation was presented on time, and we were satisfied that the change sponsor had met the requirements of the Process up to that point. Progress to the next Step of the Process was therefore approved.
A.3	Stage 2 DEVELOP & ASSESS Gateway
A.2.1	The sponsor did not initially progress through the stage 2 gateway assessment meeting (held January 2022). The actions were addressed, and the required documentation was presented on time for a subsequent gateway assessment meeting (held April 2022) and we were satisfied that the change sponsor had met the requirements of the Process up to that point. Progress to the next Step of the Process was therefore approved.
A.3	Stage 3 CONSULT Gateway
A.3.2	<p>The required documentation was presented on time for the Stage 3 Gateway Assessment Meeting. The CAA requested the completion of several post Gateway actions. Following the submission of revised documentation, we were satisfied that the sponsor had met the requirements of the Process up to that point. Progress to the next Step of the Process was therefore approved.</p> <p>The sponsor submitted their Step 3D Categorisation of Responses V1.1 on 8 March 2023. The sponsor was asked to review some areas of the categorisation for clarity and consistency. An updated Categorisation Table V1.1 was submitted to the CAA on 23 March 2023. The sponsor was asked to consider two remaining items and submitted an updated Categorisation Table V1.1 on 6 April 2023. The CAA was satisfied that the sponsor had met the requirements of the process up to that point.</p>
A.4	Stage 4 UPDATE & SUBMIT

A.4.1	The change sponsor formally submitted their proposal, which included all the required documentation.
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PART B – Consultation Assessment		
B.1	AUDIENCE	
B.1.1	Did the consultation target the right audience?	Yes
	<p>The sponsor launched their consultation directly to 248 previously identified aviation and non-aviation stakeholders engaged with in stages 1 and 2 CAP 1616 but also added members of the wider local community as stakeholders for their stage 3 consultation:</p> <ul style="list-style-type: none"> - 40 x Members of the National Air Traffic Management Advisory Committee (NATMAC) including Association of Remotely Piloted Aircraft Systems UK (ARPAS-UK), British Gliding Association (BGA), British Helicopter Association (BHA) and National Air Traffic Service (NATS). - 72 x RAF Waddington aviation stakeholders including airports/airfields/airstrips, Air Traffic Control (ATCs), flying schools and General Aviation (GA) clubs including those representing gliding and microlight activities. - 29 x Aviation stakeholders from the original RAFAT airspace change proposal. - 9 x MoD aviation stakeholders including 78 Squadron (Swanwick Military) via Defence Airspace and Air Traffic Management (DAATM), RAF Cranwell, RAF Coningsby, and United States Air Forces in Europe (USAFE). - 10 x other aviation stakeholders including search and rescue operators, pipeline, and powerline inspectors such as National Grid, and GA pilots. - 67 x County, City, Borough, and District Local authorities plus parish councils in the seven counties of Derbyshire, Leicestershire, Lincolnshire, North-East Lincolnshire, North Yorkshire, Nottinghamshire, and Rutland. - 7 x Members of Parliament for the seven parliamentary constituencies that the sponsor states RAF Waddington sits adjacent to. - 9 x Other local stakeholders including Lincolnshire Resilience Forum. - 5 x Environmental organisations including Natural England, Environment Agency, Campaign to Protect Rural England (CPRE) and Lincolnshire Wolds Area of Outstanding Natural Beauty (AONB). <p>In identifying their stakeholder audience, the sponsor considered all those who may be impacted (positively, negatively, and potentially impacted) as well as those that may just have an awareness or interest in the change proposal. The sponsor did not specifically identify any</p>	

seldom heard stakeholder groups. However, the sponsor utilised press releases issued via social media and local media to promulgate the existence of the consultation. The content of the press releases/social media posts made it clear that all stakeholders were welcome to participate in the consultation, including the public, and to comment on the proposed design. The details of drop-in events for the public were publicised using these communication channels. The sponsor made it clear in their launch email to targeted stakeholders, that where they were organisations, they were expected as over-arching bodies to consider the information provided and submit feedback on behalf of their stakeholders or members.

The sponsor's full stakeholder list has been provided at **Annex A** to their Stage 4A Consultation Review Document Issue 1.0.

B.1.2 Please provide a summary of responses below

The sponsor received 106 responses to their consultation, 84 (79.25%) from individuals and 22 (20.75%) from organisations. No feedback was received by post. The quantitative data obtained from consultation responses is set out below.

Stakeholders were asked at Question 7 to select the best description for their association with this proposal:

Question 7 Respondent description	
Aviation stakeholder	24 (22.64%)
Local Authority	6 (5.66%)
NATMAC	4 (3.77%)
None of the above	72 (67.92%)
Not answered	0
Total	106

At Question 8, stakeholders were asked if they supported the airspace change proposal:

Question 8 Responses to support for this airspace change proposal	
Yes	41 (38.68%)
No	57 (53.77%)

Unsure	8 (7.55%)
Not answered	0
Total	106

At Question 9 stakeholders were asked to rank their response to the combined airspace design (combined low and medium airspace designs):

Question 9 Responses to combined airspace design	
Strongly support	30 (28%)
Support	10 (9.4%)
Neutral	10 (9.4%)
Object	13 (12.2%)
Strongly object	43 (41%)
Not answered	0
Total	106

At Question 10 stakeholders were asked to rank their response to the low airspace design:

Question 10 Responses to low airspace design	
Strongly support	30 (28.30%)
Support	9 (8.5%)
Neutral	13 (12.2%)

Object	13 (12.2%)
Strongly object	41 (38.7%)
Not answered	0
Total	106

Response data for Question 11 which asked stakeholders to rank their response to the medium airspace design:

Question 11 Responses to medium airspace design	
Strongly support	30 (28.3%)
Support	8 (7.55%)
Neutral	17 (16%)
Object	11 (10.38%)
Strongly object	40 (37.74%)
Not answered	0
Total	106

The consultation feedback form provided open-ended questions to gather qualitative feedback on the proposal. Respondents who supported the airspace change were asked to provide details of any alterations that would improve the proposal. Those objecting were asked to explain why and to suggest any mitigations or alterations that would resolve their opposition. Finally, apart from the standard consent to publish question, stakeholders were asked if there were any other general considerations that they wished the sponsor to consider in relation to the proposal. The sponsor received qualitative data from the responses, and the data is discussed later in this assessment. The sponsor has explained that it was not always possible to determine if the feedback was pertinent to the Low, Medium, or Combined airspace designs and it was not always clear whether a respondent was commenting specifically about Protector or RAFAT. This may partly be due to the design of the qualitative survey questions which asked stakeholders to provide feedback on the “proposal” rather than channelling responses to the

	Low, Medium, and Combined designs or to considerations regarding Protector and/or RAFAT. However, the sponsor identified common themes running throughout the feedback for all designs and both airframes and has provided their response within their submission.
B.2	APPROACH
B.2.1	Did the change sponsor consult stakeholders in a suitable way? Yes
	The change sponsor conducted their consultation using the citizen space online platform via the CAA's airspace change portal and as a result their consultation was aligned with CAP 1616 requirements. Stakeholders were given the opportunity to respond to the consultation by post. The postal address was included in the consultation document and consultation strategy and publicised via social media releases. The sponsor encouraged all stakeholders to respond via the citizen space platform but consulted with two stakeholders, NATS and DAATM by email.
B.2.2	What steps did the change sponsor take to encourage stakeholders to engage in the consultation?
	<p>The sponsor used a broad mixture of communication methods and channels to encourage stakeholders to engage in the consultation:</p> <ul style="list-style-type: none"> • Stakeholders being directly targeted were sent a consultation launch email on 7 and 8 September 2022. These included the entire consultation stakeholder audience and members of the Military Airspace Users Working Group (MAUWG) (the latter don't appear to be on the stakeholder list). The email included information on how to provide feedback, links to the citizen space online platform and to supplementary information on the CAA ACP portal together with information regarding public drop-in events. The sponsor issued a consultation launch email on 13 September 2022 to three non-aviation stakeholders identified after the launch date. • The sponsor issued a press release via social media sites Twitter, Facebook, and Instagram on 7 September 2022. The sites used were Waddington Facebook, Waddington Instagram and the ISTAR Twitter Page. The press release was then distributed to local newspapers/publications, radio, and television on 8 September 2022. Newspaper and radio coverage focussed on the Lincolnshire area with the sponsor explaining that this was likely to reach the most affected stakeholders. Television coverage reached further afield due to the television transmission catchment areas of the local television channels. The outlets utilised were The Lincolnite (online), BBC Look North (East Yorkshire and Lincolnshire), ITV Calendar (Yorkshire and Lincolnshire), Lincolnshire Radio FM, BBC Radio Lincolnshire, and Lincolnshire Echo newspaper. These posts/press releases directed stakeholders to the CAA's ACP portal (where they could access the link to the consultation held on the citizen space online platform), promoted the public drop-in events and explained how those unable to respond electronically could still participate in the consultation. • Social media posts and press releases to local media outlets were re-posted/re-circulated on 20 September 2022 and 18 October 2022. The sponsor has provided evidence in support of these activities and this evidence has been reviewed (Annex B and Annex E Consultation Record).

	<ul style="list-style-type: none"> • Reminder emails were sent to all stakeholders on 17 October (6 weeks after consultation launch) and 31 October 2022 (8 weeks after consultation launch). In addition, on 17 October 2022 an email was issued, containing a reminder of the deadline for consultation responses, to those stakeholders who had attended the drop-in event. • A Frequently Asked Questions (FAQ) document was uploaded at consultation launch to the citizen space online platform. <p>Two public drop-in events were held on 21 and 28 September 2022 at the Guildhall, Lincoln and Redwood Drive Community Centre, Waddington to present the proposal and provide an opportunity for consultees to provide feedback and/or ask questions in person. MoD subject matter experts ran these events namely Protector and RAFAT, RAF Waddington Media Team, RAF Waddington Executive Team, military Air Traffic Controllers from RAF Waddington, and the Lincolnshire Terminal Air Traffic Control Centre (TATCC). A total of eighteen stakeholders attended these two events.</p> <ul style="list-style-type: none"> • Although the consultation was hosted on the citizen space online platform, stakeholders were also given the opportunity to submit postal responses to the consultation, if unable to respond electronically. A paper copy of the online feedback form was made available on request. Respondents were invited to include a stamped addressed envelope if they wanted a reply. The postal address was provided within the consultation document and was publicised via the press releases. • After the consultation had closed, the sponsor communicated directly with respondents to update them and work to resolve issues. <p>Evidence provided by the sponsor in support of the activities described above has been reviewed and is contained in the following annexes:</p> <p>Annex B Change sponsor emails and social media posts, Annex C Drop-in event presentation, Annex E Consultation Record, Annex F Continued Stakeholder Engagement Record.</p>	
B.2.3	Was the change sponsor required to respond to any unexpected events and/or challenges?	Yes
	One stakeholder expressed concerns regarding finding out about the consultation on 22 September 2022, the day after the first drop-in event. The sponsor had planned to provide up to 6-weeks' notice of the drop-in sessions. This was shortened by the period of national mourning following the death of HM Majesty Queen Elizabeth II and an unforeseen issue within the CAA and the timing of the stage 3 consult gateway assessment meeting. Stakeholders were able to attend a second drop-in session which was held on 28 September 2022.	
B.3	MATERIALS	
B.3.1	What materials were used by the change sponsor during the consultation?	
	Consultation document and feedback form – a 38-page document that provided background, scope, and context of the proposal. The sponsor explained the nature of military and civil aviation activity in the current airspace construct, gave detail	

	<p>on measures to be put in place to minimise the impact of the proposal on other airspace users, explained anticipated airspace utilisation information and stated that there would be no change to noise or air pollution for local communities. Effect on aviation stakeholders was discussed and the sponsor stated the design proposed would have a negligible effect on noise, CO2 emissions and fuel burn, air quality and tranquillity and biodiversity. A RAFAT impact statement with Safety Assurance summary for display activity was also provided. The document contained a summary of CAP 1616 design principles and options development and presented the proposed single airspace design option comprising two volumes of vertically joined airspace (low and medium designs). Stakeholders were informed how they could provide feedback and attend drop-in events.</p> <p>Full Options Appraisal – provided a summary of stage 2 initial options appraisal outputs, explanation of refinement to the airspace design conducted since stage 2 and additional information from the manufacturer of the Protector on noise output, emissions and estimated flying tempo. Safety Assessment, operating principles, options appraisal, and environmental assessments were provided.</p> <p>Citizen Space platform – the overview page provided the proposal’s statement of need, invited views from the full range of stakeholders together with members of the public, provided details of the drop-in events and gave links to the consultation materials, consultation strategy and the CAA ACP Portal.</p> <p>A set of FAQs – a 4-page document addressing key questions on the proposal. It is not clear if this was treated as a living document and updated during the consultation, as planned in the consultation strategy.</p> <p>Public drop-in event presentation material – this introduced the requirements giving rise to the proposal and provided an overview of the Protector Air System and explanation of the proposed airspace design via aeronautical charts and cross-section views of the design.</p>	
B.3.2	Did the materials provide stakeholders with enough information to ensure that they understood the issue(s) and potential impact(s) on them?	Partially
	<p>The sponsor recognised that the consultation document contained technical terms that were used to adequately describe the airspace change and the issues around it and at one point stated that these were terms which may not be easily understood by non-aviation stakeholders so went on to explain the terms in more simple language (discussion of the current local airspace arrangements). The sponsor has provided sufficiently concise and accessible material that all types of respondents can understand.</p> <p>NATS stated they were committed to working with the MoD to establish suitable airspace to support defence operations and integration of Protector into the UK airspace. However, they raised a concern that the consultation document did not clearly provide the safety assurance argument for the airspace, especially in relation to the UK Buffer Policy for Airspace Design and to substantiate the “working assumptions” stated within the document for operations of Protector in airspace classes A and C. They stated that the lack of clarity did not allow Nats En Route Limited (NERL) operations to provide the safety assurance it requires to ascertain the full impact of the proposed airspace on its operation and customers. Post-consultation engagement</p>	

	took place with NATS regarding the issues they raised during consultation. The email evidence shows that these issues were resolved to the satisfaction of both NATS and the sponsor.	
B.4	LENGTH	
B.4.1	Please confirm the start/end dates and the duration of the consultation below	
	Start date: 7 September 2022 End date: 30 November 2022 Duration: 12 weeks	
B.4.2	If duration was less than 12 weeks, what was the justification?	N/A
B.4.3	Was the period of consultation proportionate?	Yes
	The length of this consultation was in accordance with the accepted standard set out within CAP 1616, namely that consultations should last for 12 weeks. The consultation was not conducted during any major holiday seasons. The duration was reasonable, appropriate, and proportionate.	
B.5	GENERAL	
B.5.1	Was the conduct of the consultation aligned with the consultation strategy?	Yes
	The sponsor stated that their FAQ document would evolve as common queries and themes became apparent from the feedback. It has not been possible to establish if these were updated during the consultation. Other than being able to establish this point, the conduct of the consultation was aligned with the consultation strategy.	
B.5.2	Has the change sponsor categorised the responses in accordance with CAP 1616?	Yes
	The sponsor was asked to review some areas of their initial categorisation for clarity and consistency. On review of an updated version, the sponsor was asked to consider two remaining items. On submission of updated Categorisation Table V1.1, the CAA was satisfied that the sponsor had met the requirements of the process up to that point.	
B.5.3	Has the change sponsor correctly identified all the issues raised during the consultation and accurately captured them in the consultation response document?	Yes
	The consultation data has been reviewed. The sponsor correctly identified issues raised during the consultation and has captured those within their consultation response document and Stage 4B final submission document.	

	<p>At consultation the sponsor referred to the possibility that when the full Detect and Avoid (DAA) capability is delivered to Protector, its activity may only require segregated airspace up to a maximum of 3,000 ft above aerodrome level (AAL). As an emerging concept at stage 3, the sponsor stated that they were in discussion with the air vehicle manufacturer to understand the implications for this ACP but that it may be prudent to differentiate between the upper-level requirements of the RAFAT and Protector activities, so that a smaller volume of segregated airspace (for example only up to 3,000 ft AAL) could be activated for Protector-only activity. The sponsor has provided an update on this within their Step 4B final submission document that it would be managed through another CAP 1616 process and has no bearing on this ACP.</p>	
B.5.4	<p>Does the consultation response document detail the change sponsor's response to the identified issues?</p>	<p>Yes</p>
	<p><u>Impact on local civil and military airspace users</u></p> <p>Concern was expressed by local General Aviation (GA) pilots that their operations would be severely hampered by the proposal. The view was expressed that increasing the amount of controlled airspace (CAS) to protect RAF asset activity would come at a direct cost of reduced safety for other airspace users.</p> <p>Sponsor's response: While there will certainly be some impact on various local military and civil airspace users, efforts have been made to minimise this. There may be a small impact on ease of access to the low airspace design by General Aviation. The estimated initial Protector flying tempo will require activation of segregated airspace up to 3 days per week. Protector will spend minimal time (approximately 10-minute during departure or recovery phase) in the low airspace design. Access to the low airspace design is also likely to be impacted during RAFAT display practices. The worst-case scenario for RAFAT airspace usage is likely to be 6 x 30-minute daily training slots (Monday to Friday). The estimated Protector flying tempo will require activation of the medium airspace design up to 3 days per week, but it is estimated that Protector will spend very little time in the medium airspace design. The provision of a Danger Area Crossing Service (DACS) is a key mitigation to reduce the impact on operators from local airfields along with the minimisation of activation periods. Robust notification procedures will ensure that all airspace users should be aware of the status of the proposed airspace. The proposed airspace will only be activated when Protector and RAFAT activity is planned and for the least duration possible. NOTAMs will be promulgated as early as possible to assist in flight planning. Should Protector or RAFAT activity be cancelled or concluded early, the airspace will be deactivated as soon as practicable. When not activated the airspace will revert to the current structure. General Aviation will be kept fully informed of the airspace changes and the availability of a DACS. This will maximise awareness, thereby reducing the likelihood of infringement of active segregated airspace. Media engagement, local airspace group briefings and other informing activities will be put in place prior to first use of the airspace.</p> <p><u>Access to airspace for locally situated GA clubs</u></p> <p>Concerns were raised regarding potential impact on Kesteven Model Flyers' operations.</p> <p><u>Sponsor's response:</u> Waddington ATC has drafted a Letter of Agreement (LoA) to enable all members of Kesteven Model Flyers and other locally situated British Model Flyers Association (BMFA) clubs to operate with minimal disruption during activation of the proposed</p>	

airspace.

British Parachute School (BPS), Skydive Langar operations.

BPS) did not think that the proposal would adversely affect their operations. However, they expressed concern about potential conflict at the airspace boundary due to the proximity of the boundaries of the medium airspace design to their area of operation which was referred to as a busy airfield having more than 7,000 turboprop movements per year for parachute dropping sorties.

Sponsor's response: Discussions with the Lincolnshire Terminal Air Traffic Controlling Centre (Lincs TATCC) concluded that provided the Langar activity remains outside the proposed airspace (Protector will remain inside the proposed airspace), there is no requirement to amend the current Letter of Agreement (LoA) in place between Langar and Lincs TATCC. All information regarding airspace activation, timings, frequencies etc. will be included in the relevant NOTAMs. Clarification may be sought by Langar through the Air Traffic Control (ATC) switchboard at the Lincs TATCC or via the Waddington Lower Airspace Radar Service (LARS) frequency of 119.5 MHz. Langar could request a DACS if access to the proposed airspace is of benefit to Langar aircraft. Langar aircraft will be visible to the Lincs TATCC controllers via transponder.

The evidence submitted by the sponsor shows that Skydive Langar were content to leave the LoA as it stands without any need for amendment to include specific procedures regarding the proposed segregated airspace. The sponsor stated that if at any time Skydive Langar changed their mind then further discussions could take place with Lincs TATCC. The extant LoA has also been included within the submission. It is due for review on 1 December 2025.

Impact on access for MoD/RAF aviation

Provision of DACS was considered important to effectively manage Quick Reaction Alert activity from RAF Coningsby, unplanned and military diversion requirements, to alleviate potential issues with traffic funnelling within the local area and to assist with military training in the Lincolnshire area and positioning for aircraft recoveries when Coningsby is using Runway (RWY) 07. A DACS of the medium airspace design was considered 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.

Sponsor's response: There may be some impact on access for MoD/RAF aviation conducting training sorties up to FL120 and accessing the Gamston Corridor at FL190/joining controlled airspace (CAS), although some refinement of the medium airspace design at Stage 3 was made to mitigate this (i.e. the sponsor stated in the consultation document that the western boundary of the medium airspace structure was shifted 2 nm to the east of its original position to better facilitate aircraft wishing to use the Gamston Radar Corridor at FL 190). The impact should be minimal unless there is a reason why military pilots are unable to obtain a DACS/crossing clearance.

Access to airspace for National Grid Electricity Transmission

Access to airspace during daylight activation times via air traffic control (ATC)/the proposed DACS or avoidance of lengthy daylight activation periods was sought to facilitate access in the low airspace portion for routine or emergency helicopter powerline inspections and fault-finding. It was suggested that airspace users could notify intended use of the low airspace portion via the Centralised Aviation

Data Service (CADS) system. A request was made for notification by NOTAM 48 hours in advance.

Sponsor's response: A DACS will be always available when the proposed airspace is active. Delays in providing a DACS are likely to be greater when the proposed low airspace design is occupied by RAFAT activity. National Grid helicopters would be held outside the low airspace design if it were active for RAFAT, since it would not be possible to ensure safe separation otherwise. As soon as it was safe, entry would be approved. The maximum period that an aircraft is likely to be held is 30 minutes. Access is likely to be easier while Protector is active as 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 has confirmed 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 anticipates creating procedures to ensure the maximum use of airspace below 500 ft to limit the impact upon such essential movements. Waddington ATC does not have access to CADS, and it is thought this would have resourcing implications which would be disproportionate to the benefits involved. Tactical access to the airspace will be managed by Waddington ATC, particularly if urgency is required. The airspace will be activated by NOTAM promulgated as early as possible to assist in flight planning. Should the provision of a DACS not be available due to workforce or equipment issues the airspace will be deactivated.

Increased ATC workload

The view was expressed that the new airspace could potentially create a significantly increased workload for RAF Waddington Air Traffic Controllers with the requirement to provide crossing services and co-ordinate or control RAF Cranwell arrivals when these areas are activated and due to funnelling of traffic.

Sponsor's response: The MoD is developing procedures to enable maximum flexibility for ATC provision inside the proposed airspace, whilst minimising ATC workload. This will be in the form of internal MoD Letters of Agreement (draft LoAs have been submitted – see B.6.2 below).

Provision of Automatic Terminal Information Service (ATIS)-like facility

It was suggested that the mechanism for notification and obtaining a crossing service needed to be refined and simplified to make it useable by amateur/recreational pilots, especially as the danger area was likely to be activated from time to time at weekends. An ATIS-like service was proposed whereby passing aircraft could tune to an automated message in flight to establish if the DA was likely to be hot or cold on arrival in the vicinity.

Sponsor's response: This has been considered. 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 practicable. It would be unmanageable from a resource/workload point of view and, therefore, has flight safety implications. However, Waddington Radar will provide a Danger Area Activity Information Service (DAAIS) and DACS on the Waddington Lower Airspace Radar Service (LARS) frequency of 119.5 MHz. In the event of a last-minute cancellation of the airspace and Waddington Radar is not available, London Information will provide a DAAIS on 124.6 MHz.

CAA Safety Buffer Policy

GATCO and NATS raised the CAA's Safety Buffer Policy. Concerns were raised regarding the operation of Protector within the medium airspace design and clarity sought on how safety would be assured against traffic within the Lincolnshire CTA (control area). GATCO stated that a safety argument should be presented to demonstrate aircraft containment within the medium airspace so that the CAA buffer policy would not apply within the Lincolnshire CTAs when the danger area is activated.

Sponsor's response: Work has been undertaken within the MoD and with NATS with regards to the CAA safety buffer policy due to the proximity of the Lincolnshire Control Area (CTA) to both the low and medium airspace designs. Mitigations to obtain dispensation from the policy have been identified. NATS has accepted the mitigations presented by the MoD at this stage. Application for Dispensation from the CAA Safety Buffer Policy for this ACP been submitted to the CAA (Step 4B Final Submission document Annex A [ACP 2019 -19 Step 4B Final Submission Document](#)).

Email evidence provided by the sponsor confirms NATS position, namely that while further safety assurance work will be required to be undertaken with the MoD once the design is approved by the CAA, NATS accept the mitigations presented by the MoD and have no further concerns at this stage.

Simultaneous activation of more than one piece of segregated airspace

The view was expressed that the RAF did not require airspace over both RAF Scampton and RAF Waddington and that the imposition of two areas of airspace would seriously affect GA aviation safety in the area.

Sponsor's response: 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). 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.

28/08/2023: Note of Clarification. The sponsor was approached to clarify the above statement, which can be interpreted to suggest that, should EG R313 be activated concurrently with the Waddington Low DA, a crossing service would only be provided for one or other of the areas. The sponsor confirmed that this would not be the case and that a crossing service would be provided for both areas in the event of simultaneous activation. The intent of the statement is to suggest that, should activity be underway that precludes a crossing of one area, it will be possible to cross the other area at that time, thereby minimising the impact of simultaneous activation of the 2 adjacent pieces of airspace.

Consolidation of operation days

The sponsor was asked to consolidate operation days for efficiency to leave more time for others to engage in airspace activities.

Sponsor's response: While we 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 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. Scheduling adequate time slots in shared training areas with other appropriate

defence assets is key to achieve operational delivery and output for the MoD.

Concerns regarding noise levels and environmental impact of RAFAT activity.

Concerns were expressed regarding the noise produced by drones and the impact that an increase in the numbers of aircraft would have on the local area surrounding Waddington with respect to noise and the potential impact on road safety created by low-flying aircraft. Comments were made regarding consideration for the welfare of humans and animals due to low flying aircraft. Environmental impact in terms of RAFAT use of chemical dyes, jet fuel and diesel were also mentioned.

Sponsor's response: CAP 1616, Para B42 states 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 and have been assessed as very low over and above the impact of the do-nothing option. There is expected to be a very low (if any) increase in noise as the low airspace design has the same lateral footprint as the extant Military Air Traffic Zone (MATZ) at RAF Waddington. Since RAFAT is moving its display flying training activity from RAF Scampton to RAF Waddington, no additional flying is anticipated from RAFAT, but noise will impact different communities. For the low airspace design, there may be a small increase in fuel burn if GA do not/cannot take advantage of a crossing service to achieve a direct routing. For the medium airspace design, there would be negligible impact on fuel burn since few GA operate above FL 105.

CAA: In email communication sent after the consultation had closed, the sponsor provided the respondent who had raised use of chemical dyes, jet fuel and diesel with some comments from RAFAT regarding their use in displays/training and the team's work towards a reduced, or neutral, carbon footprint.

Safety aspects of proposed activities

Some respondents expressed concern at the proposed RAFAT displaying and low flying over local built-up areas. The view was expressed that the location at Scampton was rural and surrounded by fewer dwellings but with the area around the Waddington aerodrome being more built up, the risk to residents locally was considered as being much higher. RAFAT's accident record in recent years was also referenced.

Sponsor's response: 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 remotely piloted aircraft systems (RPAS). For RAFAT activities, most of the aerobatic manoeuvring and training will occur directly overhead the Waddington airfield boundary itself and mostly to the East in the least built-up part of the airspace. The larger villages of Branston and Bracebridge Heath are on the edges of the aerobatic box and will seldom see aerobatic overflight below 500 ft. Aerobatic flight below 500 ft will not occur to the west of the airfield where the more built-up areas exist (Hykeham, South Lincoln etc.). In addition, RAFAT confirm that there would be no aerobatic overflight below 500 ft of Harmston as the village is located just outside the main display area at RAF Waddington.

Pausing the ACP

The sponsor was asked to pause the proposal until a decision is made regarding the future of EG R313.

Sponsor's response: Pausing has been considered but we will continue with the ACP to meet the tight timescales for implementation of the proposed airspace in line with the Protector and RAFAT operational requirements.

Other feedback

Some concerns were raised regarding the use of weaponised drones, including from a moral/spiritual point of view. Request was made for provision of a safe space for members of the public for viewing purposes. Also, it was requested that the basing of these activities be re-considered, and suggestions made for alternative base sites for RAFAT activity such as RAF Barkston Heath, RAF Syerston, Scotland, Wales, Cottesmore, out over sea or remaining at RAF Scampton.

Sponsor's response: Concerns about the global use of drones or by the MoD and local community infrastructure issues are outside ACP scope. Consideration has been given to the possibility of publishing airspace activation for RAFAT activity, but on balance it is felt that if display times are published/advertised in advance then the risk of additional secondary spectators in the display area/build-up of traffic on the adjacent A15 is increased. RAF Barkston Heath is considered unsuitable for RAFAT flying and RAF Syerston can only support limited flying for a limited winter period due to its location within the Trent Valley Transit Area. RAF Syerston's limited vertical extent only makes it suitable for Synchro Pair training. Neither of these options can replace EG R313 (overhead RAF Scampton).

Request for access for pipeline patrols

HeliAir requested access through the MATZ and ATZ to patrol two pipelines classed as part of the National Infrastructure that have to be surveyed at c.600 ft agl to ensure their safety and integrity.

Sponsor's response: post-consultation engagement was conducted to ensure smooth operations if the segregated airspace is approved. The sponsor passed on the routings provided by the respondent to Waddington.

Letters of Agreement (LoAs)

Existing LoA:

- RAF Waddington already has a LoA with Wickenby airfield and emailed Wickenby airfield stating that they saw no need to amend it as safe management of aerobatic activity at Wickenby is covered in the existing LoA. There appears to be no response to this email from Wickenby airfield.

The sponsor has submitted new draft LoAs and changes to existing LoAs to reduce the impact on other airspace users:

- LoA between 56 SQN/RAF Waddington/Lincolnshire TATCC/78 SQN RAF (U) Swanwick Military (SWK)/RAF Cranwell /RAFAT/ RAF Coningsby (**Stage 4B Final Submission Issue 1.0 Annex B Ref A**).
- LoA between Lincs TATCC and 78 Squadron for procedures for the handover of Protector (**Stage 4B Final Submission Issue 1.0 Annex B**)

	<p>Refs B and C)</p> <ul style="list-style-type: none"> - LoA between Waddington ATC and Lincolnshire and Nottinghamshire Air Ambulance (Stage 4B Final Submission Issue 1.0 Annex B Ref D). - LoA between Waddington ATC and British Model Flyers Association/Kesteven Model Flyers due to concerns expressed regarding the impact on their operations. Draft LoA submitted to enable Kesteven and other locally situated BMFA clubs' activity to operate with minimal disruption during activation of the proposed airspace (Stage 4B Final Submission Issue 1.0 Annex B Ref E). - 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. Work on an internal MoD Service Level Agreement/LoA between relevant units to determine priorities and develop procedures did commence, however the sponsor is refining and documenting procedures for the management of the proposed airspace instead (Stage 4B Final Submission Issue 1.0 Annex B Refs F to K). 	
B.5.5	Is the change sponsor's response to the issues raised appropriate/adequate?	Yes
	<p>The sponsor determined that further consultation was not required. The design consulted upon was not amended on account of feedback, but the sponsor has proposed mitigations to reduce the impact of the airspace change on stakeholders. There is no fundamental difference between the proposals consulted on and the final airspace change being sought. As such there is no need for re-consultation to occur.</p> <p>The sponsor continued to engage with respondents beyond the consultation closure date to provide updates on how feedback had been handled and to resolve issues. A record of continued engagement has been provided in support of these activities and reviewed (Annex F).</p>	
B.5.6	Is the formal airspace change proposal aligned with the conclusions of the consultation response document?	Yes
	Yes, the change sponsor is progressing with a final design that has not been revised following consultation. The sponsor has proposed mitigations to reduce the impact of the design on stakeholders. These are in line with the conclusions of the consultation response document.	
B.5.7	Public Evidence Session Summary	N/A
B.6	RECOMMENDATIONS/CONDITIONS/PIR DATA REQUIREMENTS	
B.6.1	Are there any Recommendations which the change sponsor should try to address either before or after implementation (if approved)? If yes, please list them below.	N/A

B.6.2	Are there any Condition(s) which the change sponsor must fulfil either before or after implementation (if approved)? If yes, please list them below.	Yes
	<p><u>GUIDANCE NOTE:</u> Conditions are something that the change sponsor must fulfil either before or after implementation, if indeed the airspace change proposal is approved. If their proposal is approved, change sponsors must observe any condition(s) contained within the regulatory decision; failure to do so will usually result in the approval being revoked. Conditions should specify the consequence of failing to meet that condition, whether that be revoking the ACP or some alternative.</p> <ol style="list-style-type: none"> 1. All Letters of Agreement to be finalised, agreed, and signed. 2. All changes to existing Letters of Agreement to be finalised, agreed, and signed. 3. All Air Traffic Management Procedures to be finalised and agreed. 	
B.6.3	Are there any specific requirements in terms of the data to be collected by the change sponsor for the Post Implementation Review (if approved)? If yes, please list them below.	Yes
	<p><u>STAKEHOLDER OBSERVATIONS</u></p> <p>The change sponsor is required to collate related stakeholder observations (enquiry/complaint data) and present it to the CAA. Any location/area from where more than 10 individuals have made enquiries/complaints must be plotted on separate maps displaying a representative sample of:</p> <ul style="list-style-type: none"> • aircraft track data plots; and • traffic density plots <p>The plots should include a typical days-worth of movements from the last month of each standard calendar quarter (March, June, September, December) from each of the years directly preceding and following implementation of the airspace change proposal.</p>	

PART C – Consultation Assessment Conclusion(s)		
C.1	Does the consultation meet the CAA’s regulatory requirements, the Government’s guidance principles for consultation and the Secretary of State’s Air Navigation Guidance?	Yes

	<p>The fundamental principles of effective consultation are targeting the right audience, communicating in a way that suits them, and giving them the tools to make informative, valuable contributions to the proposal’s development. I am satisfied that these principles have been applied by the change sponsor before, during and after the consultation. I am also satisfied that the change sponsor has conducted this consultation in accordance with the requirements of CAP 1616, that they have demonstrated the Government’s consultation principles and that the consultation has:</p> <ul style="list-style-type: none"> • Taken place when the proposal was at a formative stage – evidenced by the consultation document which stated that feedback would help to shape the final proposal and that the sponsor’s final submission to the CAA would confirm what additional amendments would be made to the chosen design on account of feedback. Although the sponsor determined that the airspace design did not require amendment on account of feedback, analysis of consultation responses and post-consultation engagement has resulted in proposed mitigations to reduce the impact of the airspace when active. • Presented the consultation material clearly and outlined the potential impacts that needed to be considered – evidenced by the provision of materials that were sufficiently concise and accessible for all stakeholder groups to understand the information and potential impacts presented. NATS En Route Limited (NERL) operations were concerned that a lack of clarity in the materials, especially with regards to the Buffer Policy, failed to provide the safety assurance it required to ascertain the full impact of the proposed airspace on its operation and customers. Post-consultation engagement took place with NATS regarding the issues they raised during consultation. The email evidence shows that these issues were resolved to the satisfaction of both NATS and the sponsor. • Provided a sufficient timeframe to allow considered responses – evidenced by a consultation duration of 12 weeks which accords with the accepted standard for consultation length set out in CAP 1616. The consultation did not span any major holiday seasons. The time allowed for consultation feedback was reasonable, appropriate, and proportionate. The sponsor continued to engage with their stakeholders after the consultation had closed to address issues and work on Letters of Agreement. • Taken into account the product of the consultation. Although the sponsor did not revise the final airspace design on account of feedback, they have proposed mitigations to reduce the impact of the airspace when active and worked with stakeholders on new and existing letters of agreement to address issues/concerns.
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Level 1 ACP

PART D – Consultation Assessment sign-off			
	Name	Signature	Date
Consultation assessment completed by Airspace Regulator (Engagement and Consultation)	██████████	████████████████████	07.08.23

Consultation assessment approved by Manager Airspace Regulation	██████████	██████████	25/8/23
Consultation assessment conclusions approved by Head AAA or GD SARG	██████████	██████████	31/8/23