

Annex A - ACP-2021-078 Stage 3D Categorisation of Responses Table

Name and contact information (Q1-2)	Organisation / Stakeholder Type (Q3-4)	Proposed Amendments or Mitigations (Q5)	Do you expect to be impacted by this change? If so, please describe the impacts. (Q6)	General considerations to mitigate impacts (Q7)	Do you support this change? (Q8)	Response may impact final proposal		Response does not change final proposal	Change Sponsor Reasoning / Justification (You said, we did)
						Impacted	Not impacted		
	Individual aviation stakeholder	I see no safety case. From what I have read it seems the volume of airspace has been increased. What are the safety criteria and what is the design that meets those criteria. If there is no safety case there can be no justification for more airspace.	Unknown at this time. The safety case would help to reveal this.	How the safety criteria impacts the airspace design. As far as I'm concerned RPAS can operate in existing airspace. The question is what are the arguments that cause the MOD to require special airspace for RPAS operations.	No. I support all RPAS operations in existing airspace. I don't support the creation of new airspace for RPAS operations without good reasoned arguments. A clear safety case which informs the airspace design.			X	Segregated airspace is not an MOD requirement. Segregated airspace is required in accordance with CAP 722 - <i>Unmanned Aircraft System Operations in UK Airspace - Guidance</i> . Page 42 states, "UAS must be able to 'detect and be detected' by means of available and recognised Electronic Consistency (EC) technology if operating BVLOS in non-segregated airspace." US High Altitude Long Endurance (HALE) RPA do not currently have a detect and avoid (DAA) capability.  The airspace was designed to accommodate normal arrival and departure as well as emergency scenarios to ensure that, in all foreseeable scenarios, the RPA will remain within the Danger Areas. A Safety Assessment has been provided in Stages 2 and 3. Other safety work conducted by the US Air Force is not releasable to the public.
	Individual aviation stakeholder	No.	No.	So long as a DACS is provided for them likes of HEMS and police aircraft, that should suffice.	Yes. It seems proportionate and, being probably all during the hours of darkness, the impact on local flyers should be close to nil.			X	A DACS will be provided. LoAs will detail how this will occur.
	Local community stakeholder representing Fairford Town Council	Not answered.	Not answered.	The Town Council operates 33 wireless network devices around the Town (CCTV network). We would like to know the frequency bands for the flight controls and whether they are likely to conflict with or affect our devices. thank you.	Not Answered			X	Prior to operations, the US Air Forces in Europe (USAFE) Spectrum Management Office will work with the UK National Frequency Management Office to avoid potential frequency interference associated with RPAS operations to/from RAF Fairford.
	Individual aviation stakeholder	You have not submitted a safety case. A safety case provides the following information. 1. Metrics to demonstrate the level of safety before the introduction of the new service. 2. In what ways the new service changes the level of safety. 3. What measures could be taken by the service provider to mitigate some of all of the safety issues identified above. 4. Why these measures are impractical. 5. A clear definition of the safety gap.  Once we have the safety gap. 1. By what means the introduction of airspace mitigates all of the safety concerns in the safety gap. 2. How the safety gap informs the airspace design to provide a clear indication of the size and extent of airspace that mitigates the safety gap. 3. What additional safety factors may influence the shape and size of the airspace. 4. The metrics that will be gathered to demonstrate that the airspace is performing the function that is designed. If you provide measurements of airspace performance it will be possible to determine that this is the right airspace for the job. 5. A backout plan of the metrics do not support the airspace design.  As you have not started with a s safety case no one will ever know if you have created the right airspace in the right place. Therefore not only this application but all applications that don't start with a safety case are flawed.  There is no reason for any airspace application to proceed without a safety case which informs the airspace design.	Disruption to class G and associated airspace when the aim should be to integrate UAVs. There's no incremental strategy to inform aviation how this airspace change will lead to integration. Integration is the stated aim of the UK government	Integrate UAVs in line with the UK government's objectives or at least show a clear incremental path that leads to that outcome	No. Because this airspace change is isolated from an overall strategy, shows no contribution to UAV integration and gives no content design that identifies the safety case and shows how the design respond to that case.			X	The issue of integration of UAS/RPAS within UK airspace is outside the scope of this ACP.  A safety assessment has been included in Stage 2 and 3 that identify risks and mitigations to those risks. A final Safety Assessment will be included in Stage 4 as well.
	Individual aviation stakeholder	You have submitted no safety case. A safety case provides the following information. 1. Metrics to demonstrate the level of safety before the introduction of the new service. 2. In what ways the new service changes the level of safety. 3. What measures could be taken by the service provider to mitigate some of all of the safety issues identified above. 4. Why these measures are impractical. 5. A clear definition of the safety gap.  Once we have the safety gap. 1. By what means the introduction of airspace mitigates all of the safety concerns in the safety gap. 2. How the safety gap informs the airspace design to provide a clear indication of the size and extent of airspace that mitigates the safety gap. 3. What additional safety factors may influence the shape and size of the airspace. 4. The metrics that will be gathered to demonstrate that the airspace is performing the function that is designed. If you provide measurements of airspace performance it will be possible to determine that this is the right airspace for the job. 5. A backout plan of the metrics do not support the airspace design.  As you have not started with a s safety case no one will ever know if you have created the right airspace in the right place. Therefore not only this application but all applications that don't start with a safety case are flawed.  There is no reason for any airspace application to proceed without a safety case which informs the airspace design. From the following, you'll see that BVLOS is perfectly possible without a TDA on a NOTAM. H5707/23: Unmanned flight will take place Q) EGT/WWULW/IV/BO/W/000/013/5150N00058W002  UAS OPR BEYOND VISUAL LINE OF SIGHT (BVLOS) UTILISING VISUAL OBSERVERS (EXTENDED LINE OF SIGHT) W/ 1NM RADIUS OF 515018N 0005744W (WESTCOTT, BUCKINGHAMSHIRE), MAX HGT 800FT AGL. FOR INFO 01280 499019, 2023-08-07/37/AU2 LOWER: Surface UPPER: 1,300 Feet AMSL FROM: 30 Aug 2023 07:00 GMT (08:00 BST) TO: 07 Nov 2023 20:00 GMT	Reduction in class G airspace (sic)	Not answered.	No. Because no safety case had been submitted. Because RPAS operation is possible on a NOTAM. See above			X	The example NOTAM is concerning BVLOS operations with visual observers within a 1 NM radius to a maximum height of 800ft AGL. This is not equivalent to the operation of a large HALE RPA that operates at or above FL500. As stated previously, the purpose of the ACP is to comply with CAA policy for the operation of BVLOS HALE RPA. Comments about CAA policy are outside the scope of this ACP.  A safety assessment has been included in Stage 2 and 3 that identify risks and mitigations to those risks. A final Safety Assessment will be included in Stage 4 as well.
	Individual aviation stakeholder	Too many danger areas already exist in the UK today. The addition of yet another one means more fuel burn for other aircraft and increased risk of airspace infringements.	Need to route around airspace when Danger Area is active	Consider re-using existing established danger areas or IFR routes.	No. It was not clear such aircraft can't follow the standard existing IFR standard routes into and out of RAF Fairford, and then perform its operational duties just like piloted aircraft which does not require segregated airspace.			X	Existing Danger Areas are not sufficient to contain HALE RPA operations from RAF Fairford.  CAP 722 - <i>Unmanned Aircraft System Operations in UK Airspace - Guidance</i> does not permit the integration suggested without an approved detect and avoid (DAA) capability. US High Altitude Long Endurance (HALE) RPA do not currently have this capability.

7	Representing NATMAC organisation - DAATM	None identified.	<p>DAATM promulgated ACP information to MOD stakeholders, the following summarises their responses:</p> <p>ASACS highlighted the potential for an air policing event to require transit through an active area, so some form of crossing service would need to be available to accommodate these high profile activity types.</p> <p>Brize Norton responses form the majority of the MOD response to the ACP:</p> <p>Brize Norton ATC had concerns that if they are providing a DACS in section A, it may be a resource burden for them to control traffic through the airspace when it is active, although they understand the amount of traffic likely to be affected to be minimal. Brize Norton ATC would prefer to be the controlling authority for section A and for Global Hawk when it is in the airspace, as it will allow them to minimise the impact on Op TANSOR, National Standby aircraft, any aircraft in emergency using Brize Norton as the MEDA, as well as routine station-based flying where aircrew are conducting essential training and currency flights. If Brize Norton ATC are not the controlling authority for any part of Section B then a robust LOA will be required to enable access for Brize traffic that sometimes requires to hold to the north prior to arrival. There is not currently an official hold in this area, however it is a routine activity.</p> <p>If airspace were to be for the sole use of Global Hawk when active, it would severely restrict the MOD's only UK strategic transport airbase and limit its ability to respond to UK commitments and global ops in the way it does today. Giving control of Section A airspace to Brize Norton would mitigate the vast majority of their concerns.</p> <p>Brize Norton aircrew highlighted concerns over:</p> <p>Where Station-based aircraft can hold when the airspace is active and access to the Davenport and Lichfield Radar corridors for departing/arriving traffic. Concerns were also raised as to what priority would be afforded to Global Hawk flights, relative to Op TANSOR, National Standby commitments and routine flying.</p> <p>They also questioned whether the 3 hour time window would account for Global Hawk returning with an emergency and whether the airspace could be activated outside of the 3 hour window.</p> <p>An LOA between USAFE and Brize Norton will be required to ensure procedures are in place that minimise the impact to Brize Norton flying and cater for crewed aircraft emergencies, as well as any potential Global Hawk emergencies. The LOA will need to define relative priorities for all Brize Norton traffic and Global Hawk, along with agreed separation standards between crewed and uncrewed military traffic and other detail such as when visual and radar pattern traffic is permitted to operate.</p> <p>Brize Norton would like to understand whether flight plans for Brize Norton airways joiners and leavers would be rejected during the period when the airspace is active. Finally, they would like to understand who will be coordinating safety promotion of the airspace to inform Brize airspace users and allow any concerns they may potentially have.</p>	<p>None other than the LOAs and procedure requirements outlined at question 6.</p>	<p>Yes. DAATM understands the importance of this ACP to USAFE and how it aligns with MOD interests at the Strategic level.</p>			X	<p>The Sponsor expects that military aircraft will be able to use the airspace for military flight during RPAS operations. The LOA in draft form will detail when concurrent operations may occur. At this time, the Sponsor expects minimal impacts to the Brize Norton traffic patterns during RWY 27 departures from RAF Fairford.</p> <p>The Sponsor also concurs with Brize Norton ATC controlling segment A. With the provision of a DACS, overall impacts should be minimal.</p> <p>It is expected that Brize Norton airway joiners and leavers will not be rejected while the airspace is active.</p> <p>The Sponsor looks forward to concluding the draft LOAs with MOD stakeholders to ensure all concerns are satisfied.</p> <p>The Sponsor feels that these comments did not impact the submission as they did not propose any change to the proposed plan for detailed LOAs or any other aspect of the planned submission. As such, these comments were determined to have not impacted the submission.</p>
8	Representing ATS Provider - NATS NERL plc	<p>The proposed times of activation are stated as an 'intent' with an option to 'rarely' activate the airspace outside of the proposed times. These terms will need to be better defined in an LoA to establish an ASM protocol to enable the AMC to take account of these limitations. The cumulative effect of multiple SUA activations also needs to be considered when defining these protocols and LoA.</p> <p>Ongoing discussions with USAFE and 78 squadron have mitigated some of the concerns of the AC operation, in particular the interaction with S05 ATS route P17. The importance of having robust DACS procedures cannot be overstated since this route will be closed and is currently the only available route via S05 for MTMA departures.</p>	<p>The proposed times of activation are stated as an 'intent' with an option to 'rarely' activate the airspace outside of the proposed times. These terms will need to be better defined in an LoA to establish an ASM protocol to enable the AMC to take account of these limitations. The cumulative effect of multiple SUA activations also needs to be considered when defining these protocols and LoA.</p> <p>Ongoing discussions with USAFE and 78 squadron have mitigated some of the concerns of the AC operation, in particular the interaction with S05 ATS route P17. The importance of having robust DACS procedures cannot be overstated since this route will be closed and is currently the only available route via S05 for MTMA departures.</p> <p>Swanwick Procedures will need to agree a LoA and associated MATS part 2 instructions. A draft of the LoA is expected to be completed by the end of November 2023. This will then, following approval, form the basis of Hazard Analysis work early in 2024.</p> <p>NATS acknowledges the sponsor's effort to meet Design Principle C. However, impact is expected below FL300 and to traffic flows in and out of airports. This will result in airspace users planning alternative routes in lower airspace as a result of the required SUA restrictions to ensure safe flight planning and traffic management. Some re-routes could be significant and further development work will be required to define any re-route scenarios should this ACP be successful. Although efforts have been made to mitigate impacts to other users e.g. the hours of operation; it is likely that some commercial traffic will suffer environmental/cost impacts as a result of Box D impinging upon P17 availability. This is of particular relevance to NATS as it undertook an airspace change in this area in March 2023 to improve capacity in that very area.</p> <p>Whilst the design does not prevent access to the wider area it may result in traffic having to be rerouted on a longer route including avoiding the area completely.</p> <p>In addition to restrictions to traffic wishing to utilise P17, initial impact assessments indicate that access to routes connecting airports in the Midlands via the COTSWOLDS CTAs 15/16/17/18 (primarily ATS Route N92) may also be restricted with airspace users having to plan alternative penalising routes. The CTA and the connecting routes were introduced to enable flight efficiency and environmental benefits using the flexible use of airspace (FUA) principles permitting their use at night. Safety assurance work will be required to investigate if this route can be operated safely during any activation of the proposed airspace. If validated, then Birmingham and East Midland operations and Airspace users may be required to reroute via an alternative route with associated environmental and flight efficiency impacts.</p> <p>With regards to Design Principle E, NATS would suggest that this design principle is partially met. The sponsor has identified meeting the AMS core element of the AMS. This ACP has a detrimental impact to other aspects including environmental impacts. NATS recently introduced FRA and systemised airspace within this airspace to benefit airspace users and deliver the AMS. This change reduces that enabled benefit and removes some elements of systemisation. It should also be noted that there is the possibility that further modernisation of the airspace and ongoing NATS ACP activities to the east of this proposed airspace will be constrained. Mitigations will need to be explored and developed for these ongoing developments. Impacts to ongoing Airspace Modernisation Strategy delivery, including systemisation in the Midlands areas and their interfaces, should be considered where this proposal could constrain ongoing broader airspace modernisation.</p>	<p>The utilisation of FUA is implied so CAP740 (ASM policy) should be considered during the development of the proposal.</p> <p>The key component is around use of a DACS during periods when the airspace is active along with ensuring that it is only active when necessary for the operation of the RPAS.</p> <p>Whilst it's acknowledged that the sponsor has provided some mitigation, clarity and definition of "coordinated in advance" is requested. ASM protocols and LoA definition will be required to allow collaborative decision making and impact assessments to be undertaken by MOD and NATS airspace and capacity managers.</p> <p>Regarding the activity windows, particularly during autumn and winter (darker, longer nights) NATS continues to seek agreement on robust ASM protocols and options that allow further flexibility on the activation times through negotiation and notification of planned activity for those times where increased civil demand is known on the shoulders of the proposed time frame. This is particularly important for planning of first rotation traffic and flows across the North Atlantic Track system.</p> <p>The ACP documentation states, 'The proposed airspace is expected to be activated 2-3 times per week for up to 3 hours per activation'. As part of the CAA approval process, NATS would like the CAA to specify 'no more than 3 activations per week' as the statement in the ACP documentation is too general. Any change to the activation periods required must require a formal change to the approved airspace. The implementation of integrated Airspace would significantly reduce the impact to the overall network.</p>	<p>Neutral. NATS has selected 'yes' to this Airspace Change as there was no 'neutral' option available. NATS' position on this ACP is 'neutral'.</p> <p>NATS understand why the sponsor needs to introduce this airspace although there are no real benefits to the LAC operation. However, NATS recognises the need to balance our own requirements with the needs of other customers. USAFE have been accommodating so far in ensuring that impact to LAC operations is minimised as much as possible and so far. At this stage the impact is believed to be minimal enough that this should not pose any significant issues or risks to the safe operation of the airspace. However, further Safety Assurance work will be required to be completed to confirm this ahead of deployment in accordance with normal processes.</p> <p>It should be noted that the absence of regulatory approval (for RPAS integration) is resulting in a design for segregation. As stated above this is likely to have some impact on other users and add disbenefit to previous airspace changes approved by the CAA.</p> <p>NATS' preference would be to see flexibility in CAA Policy to allow for increased integration of RPAS over segregation noting MOD's integration argument for other RPAS when operating in a "known environment". In this argument, it is proposed that suitable mitigations such as ATS service provision, procedures and coordination agreements could reduce the need to operate within segregated airspace.</p> <p>NATS acknowledges and thanks the sponsor for regular engagement and development of the proposal so far. Further safety assurance, airspace management and procedure development will be required should this ACP be approved to ensure its safe implementation and to fully minimise the impact on our operation and customers.</p> <p>It is stated that a 2nm internal buffer is planned. NATS seeks confirmation that this internal buffer will be applied as it supports the safety assurance arguments expected in respect to proximity of GAT aircraft operating within CAS and aircraft operating within the proposed SUA. This includes areas where B abuts the FUA COTSWOLDS CTAs 15/16/17/18.</p> <p>NATS would seek clarity as to whether this will need amending under the proposed changes to CAA SUA Policy and associated buffer policy.</p> <p>NATS is aware of the precedence set by CAA conditions to a separate MOD ACP supporting BVLOS RPAS operations stating that DACS cannot be provided when the RPAS is operating in the airspace - particularly applicable to civil aircraft. The assumption therefore is that no coordinated transit or DACS can be provided to civil aircraft. To develop our plans and assurance arguments, NATS would seek clarity on this assumption.</p> <p>The sponsor mentions that the need for segregated airspace will be reviewed every two years. NATS would suggest and encourage this be reviewed sooner where opportunity arises, should CAA Policy be updated for example, particularly where the proposed SUA has a detrimental impact to operations, capacity and flight efficiency/environment in the CTAs and upper air.</p> <p>The sponsor mentions the onwards transit of the RPA and a supporting Operational Agreement, NATS would like to understand this further and the associated assurance arguments for this agreement so that impact assessments can be undertaken to develop appropriate procedures where required. CAA Policy states that 'The primary means of achieving BVLOS operations without using a technical DAA capability, is using airspace segregation. It is not current CAA policy to accept a probabilistic safety argument based on historic traffic data as the sole component of a safety argument'. NATS would like to understand how the onward transit of the RPA will be carried out in non-segregated Airspace.</p> <p>For HALE Option 3 the sponsor describes the recovery process for the platform. Clarity is required regarding this. It is stated that descent will begin in Area C and B. Does this imply that area D is not required for the recovery and potentially lessen the impact to the network and airline operators - particularly in the vicinity of ATS route P17.</p> <p>The ACP time does not align with previous engagement discussions or the required timelines for critical ATM system updates required to safely deliver this airspace change. NATS would like to discuss further the implementation dates should this proposal be approved by the CAA.</p>	<p>Neutral. NATS has selected 'yes' to this Airspace Change as there was no 'neutral' option available. NATS' position on this ACP is 'neutral'.</p> <p>NATS understand why the sponsor needs to introduce this airspace although there are no real benefits to the LAC operation. However, NATS recognises the need to balance our own requirements with the needs of other customers. USAFE have been accommodating so far in ensuring that impact to LAC operations is minimised as much as possible and so far. At this stage the impact is believed to be minimal enough that this should not pose any significant issues or risks to the safe operation of the airspace. However, further Safety Assurance work will be required to be completed to confirm this ahead of deployment in accordance with normal processes.</p> <p>It should be noted that the absence of regulatory approval (for RPAS integration) is resulting in a design for segregation. As stated above this is likely to have some impact on other users and add disbenefit to previous airspace changes approved by the CAA.</p> <p>NATS' preference would be to see flexibility in CAA Policy to allow for increased integration of RPAS over segregation noting MOD's integration argument for other RPAS when operating in a "known environment". In this argument, it is proposed that suitable mitigations such as ATS service provision, procedures and coordination agreements could reduce the need to operate within segregated airspace.</p> <p>NATS acknowledges and thanks the sponsor for regular engagement and development of the proposal so far. Further safety assurance, airspace management and procedure development will be required should this ACP be approved to ensure its safe implementation and to fully minimise the impact on our operation and customers.</p> <p>It is stated that a 2nm internal buffer is planned. NATS seeks confirmation that this internal buffer will be applied as it supports the safety assurance arguments expected in respect to proximity of GAT aircraft operating within CAS and aircraft operating within the proposed SUA. This includes areas where B abuts the FUA COTSWOLDS CTAs 15/16/17/18.</p> <p>NATS would seek clarity as to whether this will need amending under the proposed changes to CAA SUA Policy and associated buffer policy.</p> <p>NATS is aware of the precedence set by CAA conditions to a separate MOD ACP supporting BVLOS RPAS operations stating that DACS cannot be provided when the RPAS is operating in the airspace - particularly applicable to civil aircraft. The assumption therefore is that no coordinated transit or DACS can be provided to civil aircraft. To develop our plans and assurance arguments, NATS would seek clarity on this assumption.</p> <p>The sponsor mentions that the need for segregated airspace will be reviewed every two years. NATS would suggest and encourage this be reviewed sooner where opportunity arises, should CAA Policy be updated for example, particularly where the proposed SUA has a detrimental impact to operations, capacity and flight efficiency/environment in the CTAs and upper air.</p> <p>The sponsor mentions the onwards transit of the RPA and a supporting Operational Agreement, NATS would like to understand this further and the associated assurance arguments for this agreement so that impact assessments can be undertaken to develop appropriate procedures where required. CAA Policy states that 'The primary means of achieving BVLOS operations without using a technical DAA capability, is using airspace segregation. It is not current CAA policy to accept a probabilistic safety argument based on historic traffic data as the sole component of a safety argument'. NATS would like to understand how the onward transit of the RPA will be carried out in non-segregated Airspace.</p> <p>For HALE Option 3 the sponsor describes the recovery process for the platform. Clarity is required regarding this. It is stated that descent will begin in Area C and B. Does this imply that area D is not required for the recovery and potentially lessen the impact to the network and airline operators - particularly in the vicinity of ATS route P17.</p> <p>The ACP time does not align with previous engagement discussions or the required timelines for critical ATM system updates required to safely deliver this airspace change. NATS would like to discuss further the implementation dates should this proposal be approved by the CAA.</p>	X		<p>The Sponsor understands that while operating 1 hour after sunset and 1 hour prior to sunrise may minimize the impacts to GA traffic, the impacts to IFR traffic will still exist and have the potential to affect more aircraft during the longer nights of fall and winter. Because of this, the Sponsor's intent is to only activate the Danger Areas between the stated times of 20:00 and 05:30 UTC. The purpose for the general statement is to allow for activations outside of this window (but still between 1 hour after sunset and 1 hour before sunrise) in the event of an operational requirement. While this isn't currently anticipated, it must be accounted for to provide the flexibility to meet Department of Defense needs. The Sponsor is happy to work with NATS and MOD to further refine how often this may occur, what would drive such an activation, and how this time would be coordinated.</p> <p>The Sponsor will ensure airspace not required for HALE RPA operations are made available for a DACS as soon as possible. Also, when the airspace is no longer required for arrival, departure, or for an unplanned early return, the airspace will be deactivated, and the NOTAM will be cancelled.</p> <p>The Sponsor's intention remains to activate 2-3 times per week. We would like to discuss this further with NATS to determine if weekly volume is more important to NATS or if total annual activations are of greater concern. Our impact analysis was conducted assuming 3 activations per week and 156 activations per year. If the Sponsor's operational requirements changed and, for example, 4 activations were required for 2-3 weeks but annual activations remained below 156 for the year, would NATS consider the impact unchanged? Would a 14-day notification mitigate these concerns? Please understand that this is only a hypothetical question posed to better understand NATS' concerns while providing as much operational flexibility as possible for future military requirements.</p> <p>The Sponsor's intention is to request dispensation to the current buffer policy to allow for a 3 NM buffer from CTAs, etc. and ATS routes. Should the CAA's buffer policy be changed, The Sponsor would engage with NATS to determine if additional safety assurance work would be required before implementation of a reduced buffer.</p> <p>The Sponsor's understanding is that the segmented design on the Danger Area complex would permit DACS transits in any segment that the BVLOS RPAS has vacated. In practice, USAFE's intention is to proactively return segments to Brize Radar and Swanwick Military for a DCAS when the HALE RPA has vacated the segment and is at an altitude or position to ensure that the segment will not be required for an emergency or contingency situation. Further clarification from the CAA will be sought on this topic.</p> <p>The Sponsor will commit to a review every two years or sooner should CAA policy be updated to allow for reduced impacts to operations, capacity and flight efficiency/environment in the CTAs and upper air while maintaining the Sponsor's operational requirements.</p> <p>In recent discussions with the CAA, the Sponsor expects the HALE RPA Operational Arrangement to require segregated airspace during onward transit in the form of an airspace reservation. The language is currently being drafted by the CAA and a draft will be shared when completed.</p> <p>Descent will begin in Areas D and C and those areas will be required for the majority of the descent profile. This will be corrected in the final submission.</p> <p>Can you please elaborate on what timeline does not align? The Sponsor is happy to discuss this further to ensure that the required ATC system updates can be accomplished.</p> <p>The Sponsor feels that these comments did not impact the submission as they did not propose any change to the proposed request for buffer policy dispensation or any other aspect of the planned submission. As such, these comments were determined to have not impacted the submission.</p>
9	Representing NATMAC organisation - British Gliding Association (via email)	None noted.	<p>The British Gliding Association notes that the consultation document refers to operations being limited to after sunset and before sunrise. On that basis, the BGA does not object to the proposal.</p>	<p>We note that no alternate landing airfield has been identified in the ACP. Our experience with UK MOD is that an ACP was proposed for a DA for RPAS operations (Waddington), and following approval, MoD has subsequently submitted an ACP for a contingency DA of the same dimension to be available for concurrent activation (at Marham). We would be grateful for your comments on that point in respect of your ACP.</p>	<p>The BGA does not object to the proposal.</p>			X	<p>The activation window was of no earlier than 1 hour after sunset and no later than 1 hour prior to sunrise was specifically chosen to have as little impact to GA aircraft as possible.</p> <p>There is no plan to establish a contingency DA at another airfield associated with the operations related to this ACP.</p>
10	Representing NATMAC organisation - Association of Remotely Piloted Aircraft Systems (via email)	None noted.	<p>Thank you for sending us the details of your ACP. In order to better understand the exact location of the A Sector's location in Option 3, could I ask you to send me a .kmz file, with the proposed area marked out to a resolution of a few meters. Although we understand that the DA will be activated largely at night, it covers a sizeable area that will require separate approvals to be sought, should any of our members be operating when it is active. However, with the current map it is extremely difficult to see the exact area covered in the detail that Operators of sub 25kg RPAS require.</p> <p>Sub 25kg RPAS are mainly used for data capture purposes. This includes data that is in both the visible part of the light spectrum such as photography and the invisible part of the light spectrum, such as infrared. The latter produces thermal imagery that is sometimes used for detecting heat loss from housing. A good time to undertake thermal surveys is at night when there is less atmospheric distortion from the sun.</p> <p>Whilst I have no concrete proof that there will be Operators undertaking this activity within the area defined by Segment A, it is difficult to determine the exact area that is represented in the maps you have produced, because you appear to use the same size area to mark Segment A on maps that are at different scales. Therefore it would be useful to receive a .kmz so I can check how many towns and cities are included and inform our membership in advance.</p>	N/A	<p>Whilst we do not at this stage see any reason to object to your application, you will I am sure understand that communicating with our membership is important</p>			X	<p>A .kmz file was emailed to the stakeholder. The stakeholder did not reply with additional comments or concerns.</p>

11	Representing NATMAC organisation - General Aviation Alliance (via MS Teams Virtual Consultation)	None noted.	The stakeholder shared that, with a DACS, there should be minimal impact to general aviation traffic. Further clarification was requested on how long, on average, Segment A would be unavailable for a DACS due to HALE RPAS operations.	The stakeholder indicated that the provision of a DACS would mitigate virtually all impacts to general aviation aircraft.	Neither support nor objection was noted during the virtual consultation.			X	While we are unable to comment on situations that would limit ATC's availability to provide a DACS, our mission planners have indicated that Segment A would need to be sterilized for up to 30 minutes for both departures and arrivals (one time per activation). As soon as it is safe to do so, we would release each segment to ATC to allow for a DACS.
12	Representing Local aviation stakeholder - Cotswold Airport (Kemble) (via email)	N/A	Please can you expand on the area that involves Kemble (EGBP)? The drawing on the proposal isn't very clear and a little more detail in a higher resolution picture of the map would be useful.  How does it affect our RNP approach for RWY 26???	N/A	N/A			X	The Sponsor followed up via email and the stakeholder confirmed that the proposed hours of between 20:00 – 05:30 UTC (no earlier than 1 hour after sunset – 1 hour prior to sunrise) would not impact their operations.  The Sponsor provided a copy of one of the maps in the consultation materials zoomed in on segment A with an indication of the location of Cotswold Airport.  The Sponsor also assured the stakeholder that there were no plans to expand beyond the hours stated above.
13	Representing Local authority stakeholder - Gloucestershire County Council (via email)	N/A	N/A	N/A	Thank you for consulting Gloucestershire County Council on the above matter. I can confirm that we have no officer comments to make.			X	No comments.
14	Representing Local aviation stakeholder - Bidford Gliding & Flying Club (via email)	N/A	Having consulted our CFI and CP they agree this has little affect to our operation.	N/A	N/A			X	No comments.
15	Member of NATMAC organisation - British Helicopter Association (via email)	N/A	N/A	N/A	They've (USAF) abandoned Options 1 and 2 after consultation with NATS !!  What on earth are NATS doing insisting on restrictions?? It's open airspace and they should 'butt out'... they should stick to comments about controlled airspace....  Tragic that USAF are applying for a Danger Area to cover this minor activity.... We don't want more Danger Areas ... but we definitely don't want to stop the USAF flying Unmanned aircraft...	I strongly believe that the USAF should be free to use our airspace as they see fit without any impediment.		X	The Sponsor replied the stakeholder with the following message.  We appreciate the support for our ACP but would like to provide additional clarification to why Option 1 and 2 were discounted. USAF discounted Options 1 and 2 in lieu of a safer and more efficient design option that has fewer impacts to other users of the airspace. This was informed by stakeholder feedback as well as USAF analysis.  We understand that airspace is a finite resource. From the beginning of this ACP, one of our top priorities has been to minimize impacts to other users of the airspace. NATS did not insist on restrictions. Instead, engagement with NATS has helped us better understand the impacts of our design options where they interacted with controlled airspace and ATS routes. This engagement has resulted in a new option that we feel better aligns with our design principles.
16	Representing National organisation - Environmental Agency (via email)	N/A	We have received the following response from our Environment Management Waste Team  In respect of the environmental setting and risk to groundwater, I have consulted with our Groundwater Quality and Contaminated Land Team. Your site is located within a Source Protection Zone 1, 2 and 3. Cotswolds Water Park SSSI sites are also located nearby.  The proposals should include specific appropriate incident plans based on the environmental setting including groundwater. From the groundwater protection point of view, incident plans should be no less stringent than those for manned aircraft.  Please see below for comments from our groundwater team: We note that in the document: ACP-2021-078 - Enabling Remotely Piloted Aircraft Operations from RAF Fairford - HALE, Stage 3 – CONSULT OPTIONS APPRAISAL (PHASE II – Full) Version 2 •On page 6 Design Principle g is Minimise the environmental impact of non-participating aircraft but there is no principle with respect to the impact of the "participating" aircraft. •On page 15, 7, states: 7. Specific emergency procedures are currently being developed.  This needs to include environmental factors including the assessment of risk to groundwater and mitigation measures. I note the current Annex A – Environmental Impact Assessment does not appear to consider the water environment at all.  If you have any further questions, please feel free to get in touch with by email at Teresa.Mkolajuk@environment-agency.gov.uk  We do not have any additional comments.	N/A	N/A			X	The Sponsor replied to the stakeholder indicating that no impact to groundwater was expected and explained that, for a Level M2 ACP, CAP 1616 does not require the Sponsor to analyze the impacts to groundwater or the environmental impacts derived from activities of military aircraft, HALE RPA in this case.  The Sponsor also asked for clarification of how groundwater is expected to be impacted? If the concern is for contamination via an emergency landing, the Sponsor feels that this is outside the scope of this ACP and would be covered under RAF Fairford's existing emergency response plans.
17	Individual community member (via email)	N/A	Please can you reassure me on the noise levels to be experienced on the ground associated with this proposal ?  LA max readings at heights up to 7000 feet at 1000 foot intervals ?	N/A	N/A			X	In accordance with CAP 1616, "the Ministry of Defence need only ever assess the anticipated environmental impacts of the consequential changes on civil aviation patterns". No impacts to civil traffic patterns are expected below 7,000 feet for this proposal. As such, no noise impacts related to civil traffic patterns are expected, and no noise study was required or conducted.