



Ministry
of Defence

ACP-2021-078

**Enabling Remotely Piloted Aircraft Operations
from RAF Fairford - HALE**

Stage 4A – Consultation Review

Contents	
Introduction	3
Section 1 – Consultation (We Asked)	5
Section 2 – Summary of Consultation Responses (You Said)	7
Section 3 – Categorisation of Responses (We Did)	9
Section 4 – Summary and Next Steps	11

Annexes

Annex A – Stakeholder List	12
Annex B – Citizen Space Consultation Summary Report	14

Annexes Separate to this Document

- Annex C – Stakeholder Consultation Presentation**
- Annex D – Consultation Evidence**

References

- A. ACP ACP-2021-078 Stage 3 Consultation Strategy**
- B. ACP-2021-078 Stage 3D Categorization of Responses**
- C. Citizen Space Portal**

Introduction

Background

This document forms part of Stage 4A of the Airspace Change Proposal ACP-2021-078, which seeks to enable regular Beyond Visual Line of Sight (BVLOS) operation of High Altitude Long Endurance (HALE) Remotely Piloted Air Systems (RPAS) from RAF Fairford.

This document aims to provide evidence that the Change Sponsor has adhered to the guidelines laid down in CAP 1616, following the 'we asked, you said, we did' mechanism and will:

- Demonstrate the consultation process was executed in accordance with Ref. A.
- Provide a summary of consultation responses together with an analysis of key themes identified in Ref. B.
- Inform how the proposal has been updated as a result of the consultation.
- Summarise the next steps prior to submitting all remaining documentation within the timeline agreed with the CAA.

Analysis conducted at Stage 3D determined that further consultation was not necessary as the feedback received did not significantly affect the overall design for the final proposal. Any actions identified (e.g. updates or improvements to existing procedures) could be addressed without additional consultation. The analysis also demonstrated that:

- The strategy was successful in reaching a sufficient number of stakeholders in order to validate the analysis.
- An adequate variety in representation of stakeholders provided feedback during consultation to ensure the analysis is valid.

Section 1 – Consultation (We Asked)

The Consultation was conducted between 11 October and 21 November 2023 in accordance with Ref. A, and CAP 1616, to provide suitable opportunity for any interested parties to provide feedback on the ACP.

A total of 94 previously identified stakeholders were contacted directly by email at Consultation launch on 11 October 2023 to notify them of the launch of the Consultation. The targeted stakeholders were asked to consider the information provided and submit feedback on behalf of their stakeholders, members, or as individuals. The complete list of targeted stakeholders is at Annex A; Table 1 summarises the stakeholder numbers by group.

The launch email to stakeholders provided details of the Consultation and how to provide feedback, including links to the Civil Aviation Authority (CAA) ACP Portal and Citizen Space, together with information regarding public drop-in events. Reminders were sent to all stakeholders via email on 6 November 2023.

National Aviation Stakeholders	
National Air Traffic Management Advisory Committee (NATMAC) members	33
Local Aviation Stakeholders	32
Airline Stakeholders	12
Non-Aviation Stakeholders	
Local Authority Stakeholders	11
Other Local and Natural Organisations	6
Individuals ¹	4

Table 1: Number of Stakeholders Contacted directly, by category.

To aid those providing comment via the online Feedback Form, the following documentation was uploaded electronically at the launch via Citizen Space on 11 October 2023:

- Consultation Document – providing background information and details of the design options, including mitigations.

¹ The identified individual stakeholders were aviation as well as on-aviation stakeholders.

- Full Options Appraisal – providing analysis of the design option against a baseline ‘do nothing option’, factoring in safety and environmental impacts.
- Consultation Strategy – outlining the audience, approach, material and length of the Consultation period required for this ACP.
- Frequently Asked Questions (FAQs) – providing a summary of responses to anticipated and most recurring queries raised during the Consultation.
- Stakeholder Consultation Presentation

Virtual meeting events were via held Microsoft Teams on 24 October at 1300 and 2 November 2023 at 1800. These events were hosted by representatives from Headquarters United States Air Forces Europe/Air Forces Africa (USAFE-AFAFRICA) Change Sponsor Subject Matter Experts (SMEs). SMEs were on hand to discuss the ACP and provide clarification to any specific queries. A presentation containing basic details of the airspace design option and the expected impacts was briefed to meeting attendees; this can be found at Annex C. The feedback from these meetings is found in Ref. B and Annex D. A reminder email regarding the deadline for feedback was sent out to stakeholders on 6 November 2023.

The Change Sponsor continued to engage with respondents beyond the closing date of the Consultation in order to clarify or resolve issues raised.

Section 2 – Summary of Consultation Responses (You Said)

This section is a synopsis of the Consultation responses submitted via the Feedback Form on Citizen Space. The Change Sponsor encouraged all stakeholders to respond formally via these means; however, the Change Sponsor received email feedback from several stakeholders. A summary of these emails can be found within Ref. B. No feedback was received via post.

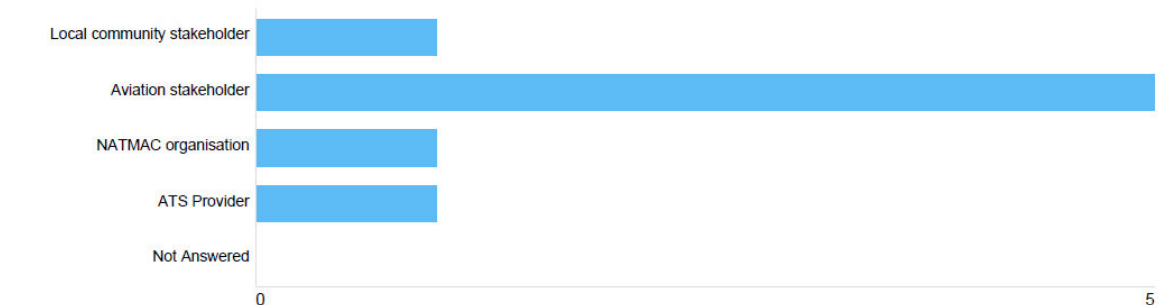
Feedback received via Citizen Space

A total of 8 survey responses were received via Citizen Space; 5 were from individuals and 3 respondents were representing an organisation. The Consultation Summary Report can be found at Annex B and raw responses at Ref. C. The graphs below depict extracts from the Citizen Space Consultation summary report.

Figure 1 illustrates how respondents were associated with the ACP.

Question 4: What best describes your association with this airspace change?

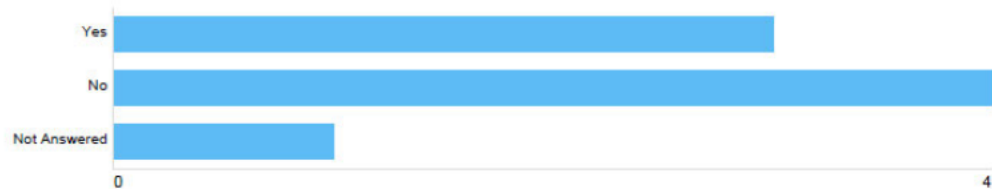
Stakeholder Type



Option	Total	Percent
Local community stakeholder	1	12.50%
Aviation stakeholder	5	62.50%
NATMAC organisation	1	12.50%
ATS Provider	1	12.50%
Not Answered	0	0.00%

Overall, 2 respondents² did not support the ACP compared to 2 who did³. One respondent did not answer (Figure 2).

Do you support this airspace change?



Option	Total	Percent
Yes	3	37.50%
No	4	50.00%
Not Answered	1	12.50%

Why or Why Not?

There were 7 responses to this part of the question.

Common Themes

- The requirement for Letters of Agreement (LoAs) to be finalized to mitigate impact and increase safety.
- Concerns about disruption/reduction to Class G airspace.
- Concerns about re-routing around the Danger Areas when activated.
- The need for a crossing service for high priority military and civil flights.
- Negative impacts to capacity and efficiency of the air traffic network
- Concern about impacts to Brize Norton based aircraft.

These themes have already been considered by the Sponsor at earlier steps and the Sponsor is in the process of finalising LoAs to mitigate impacts to military and civil traffic, increase safety, and detail the provision of a Danger Area Crossing Service (DACS).

Feedback received outside of Citizen Space

A total of 9 responses were received outside of Citizen Space; 4 were from NATMAC organisations, 2 were from local Aviation stakeholders, and 1 each were from a local authority, a national organisation, and an individual community member.

Although all stakeholders were encouraged to complete the feedback survey, none of these respondents elected to do so. As such, they did not definitively indicate support or opposition. Instead, they choose to either gain clarity on a specific issue or indicate that they did not object to the proposal. A summary of this feedback and the response can be found in Ref. B.

² 3 responses not supporting the airspace change were completed by the same respondent. The primary rationale for not supporting the airspace change was due to objections to CAA policy on BVLOS RPAS and was deemed to be outside of the scope of this ACP.

³ NATS was neutral but selected “yes” because there was not a “neutral” option.

Section 3 - Categorisation of Consultation Responses (We Did)

At Stage 3D, the Change Sponsor categorised all responses into those that may impact the final ACP and those that do not. This Categorisation is at Ref. B. Responses that may impact the ACP were then subcategorised into those which will lead to changes to the overall submission and those which will not. The following definitions were used when analysing responses:

Responses may affect the final submission. Any response that has the potential to impact the final submission has been placed into this category and assessed as either:

Impacted. A proposal from a stakeholder that would impact the management of the airspace or alter the size, shape or construct of the final design that has not already been considered.

Not Impacted. A proposal from a stakeholder that would impact the management of the airspace or alter the size, shape or construct of the final design but has already been considered, discounted, or implemented at an earlier stage of this ACP. There were 2 responses that met this definition.

Response does not change the final proposal. This category applies to all responses that do not have relevance to the final submission, either in terms of the overall airspace design, future operation of the Danger Area itself or the noise impact of military aircraft. There were 15 responses in this category. Where comments have been received, a response was provided by the Change Sponsor either via email or within the Categorisation of Responses table.

Themes/justification of responses did not impact the submission/design

1. Impacts/Reduction to Class G airspace

The Sponsor acknowledges potential impacts to Class G Airspace but this is expected to be minimal. This is informed by observation of ADS-B data by the Sponsor, the impact analysis simulation presented in Stage 3, and stakeholder feedback which indicated that impacts to Class G and general aviation should be minimal with the provision of a DACS.

2. Requirement for LoAs

The Sponsor concurs with the assessment that robust LoAs are required and has been engaging with MOD and NATS to finalise the relevant LoAs.

3. Concerns about re-routing around the Danger Areas when activated

The Sponsor has considered this impact in every stage of the ACP and has worked diligently to minimise this impact to the maximum extent possible while still providing the required military capability.

4. The need for a crossing service for high priority military and civil flight

The provision of a DACS has been planned since Stage 2. Detailed procedures will be included in LoAs currently being finalised.

5. Impacts to Brize Norton based aircraft

The Sponsor expects that the majority of impacts to Brize Norton based aircraft will be mitigated through pre-coordinated procedures and overall control of segment A of the Danger Area by Brize Norton. This was an existing intention of the Sponsor and details will be included in the LoA with Brize Norton.

Themes/justification of responses deemed to be out of the scope of the ACP

1. RPAS operations within existing airspace

The four survey responses not in support of the ACP were from two respondents⁴ that broadly advocated for beyond visual line of sight (BVLOS) RPAS to operate outside of segregated airspace utilizing a NOTAM or existing airspace structures and routes. As the Sponsor is not seeking dispensation from this requirement in CAP 722 - *Unmanned Aircraft System Operations in UK Airspace – Guidance*, this has been deemed to be outside of the scope of this ACP.

2. Environmental concerns related to noise and groundwater contamination

One response was received that asked for the noise levels on the ground associated with this proposal. 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.

Another respondent asked the Sponsor to include the groundwater environment in the Environmental Impact Analysis. This is not a requirement of CAP 1616 and any requirements will be covered under RAF Fairford’s existing emergency response plans.

⁴ One respondent completed 3 surveys.

Section 4 – Summary and Next Steps

The Consultation period was considered successful by the Change Sponsor. Feedback was received from a diverse representation of stakeholder groups with particularly constructive feedback from the aviation community.

Although 2 respondents objected to the ACP overall, the majority of the associated comments were in relation to CAA policy on BVLOS RPAS without a detect and avoid capability as well as the feeling that there were already too many Danger Areas. Both of these themes were deemed outside the scope for this ACP.

Responses from NATMAC organisations were mixed, with some clarification required on activation periods, procedures to minimise impacts to military and civil flights, notification of airspace booking, and questions of access for high priority flights. Responses have been provided and the Sponsor has already planned inclusion or clarification of these items via LoAs with NATS and MOD stakeholders. Engagement will continue to conclude these LoAs as soon as possible.

As a result of the Consultation feedback, the Change Sponsor has determined that the airspace design proposed at Stage 3 does not require amendment. As such, the Sponsor, after consultation with the CAA, will move to Stage 4B and prepare the submission of the airspace proposal.

Annex A – Register of Stakeholders

Stakeholders were broken down into the groups below. Those highlighted in green represent a stakeholder who submitted a formal consultation response. This does not include stakeholders who may have previously conducted engagement with the Sponsor as part of the wider proposal.

NATMAC Stakeholders		
Airlines UK	Airport Operators' Association (AOA)	Airfield Operators' Group (AOG)
Aircraft Owners and Pilots Association (AOPA)	Airspace Change Organising Group (ACOG)	Association of Remotely Piloted Aircraft Systems UK (ARPAS UK)
Aviation Environment Federation (AEF)	British Airways (BA)	BAe Systems
British Airline Pilots' Association (BALPA)	British Balloon and Airship Club	British Business and General Aviation Association (BBGA)
British Gliding Association (BGA)	British Helicopter Association (BHA)	British Microlight Aircraft Association (BMAA)
British Skydiving	Drone Major	General Aviation Alliance (GAA)
Guild of Air Traffic Controllers (GATCO)	Honourable Company of Air Pilots (HCAP)	Helicopter Club of Great Britain (HCGB)
Heavy Airlines	Isle of Man CAA	Light Aircraft Association (LAA)
Low Fare Airlines	Military Aviation Authority (MAA)	Ministry of Defence - Defence Airspace and Air Traffic Management (MoD DAATM)
National Air Traffic Services (NATS)	Navy Command HQ	PPL/IR Europe
UK Airprox Board (UKAB)	UK Flight Safety Committee (UKFSC)	United States Visiting Forces (USVF), HQ United States Country Rep-UK

Local Aviation Stakeholders		
Bath, Wilts and North Dorset Gliding Club	Bristol & Gloucestershire Gliding Club / Nympsfield Airfield	Bristol Airport
Charlton Park Airfield	Clench Common Microlight Site, Marlborough	Cotswold Airport (Kemble)
Cotswold Gliding Club / Aston Down Airfield	Dalton Barracks, Abingdon	Draycott Aerodrome, Swindon
Enstone Airfield	Gloucestershire Airport	London Oxford Airport
Membury Airfield	Oaksey Park Airfield, Malmesbury	RAF Benson
RAF Brize Norton	RAF Little Rissington	RAF Weston-on-the-Green
Rendcomb Airfield	RLC Silver Stars, South Cerney	South Cerney, Cloudbase Paragliding
Vale of the White Horse Gliding, Sandhill Farm	West Wales Airport	Wiltshire Microlight Centre, Calne
Bidford Gliding & Flying Club	Ledbury Airfield	Shobdon Airfield
FLYER		

The following is a list of potentially impacted airlines that were identified based on simulated traffic samples found in the NATS impact analysis. The Sponsor was unable to find the appropriate contact information but attempted to consult with these individual airlines via the airline trade groups in the NATMAC list. No responses were received from the trade groups or the airlines.

Airline Stakeholders		
Air Canada	Air France	Ethiopian Airlines
European Air Transport	FedEx	Jet2
Lufthansa	Ryanair	TUI Airlines
United Airlines	UPS	West Atlantic Cargo Airlines

Local Authority Stakeholders		
Fairford Town Council	Cotswold District Council	Swindon Borough Council
Vale of White Horse District Council	West Oxfordshire District Council	Gloucester City Council

Gloucestershire County Council	Oxfordshire County Council	Warwickshire County Council
Wiltshire County Council	Worcestershire County Council	

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

Individuals		
██████████	██████████	██████████
██████████		

Annex B – Citizen Space Consultation Summary Report



Annex B: Enabling RPAS Operations from RAF Fairford - HALE: Summary report

Contents

Question 1: What is your name?	1
Name	1
Question 2: What is your email address?	1
Email	1
Question 3: Are you responding as an individual or do you represent an organisation?	1
Individual or Organization	1
Organisation	2
Question 4: What best describes your association with this airspace change?	2
Stakeholder Type	2
Question 5: The Sponsor endeavors to minimise the impact of its operations to other user of the airspace while still ensuring that required military activity can safely and efficiently be conducted. Are there any design amendments or potential mitigations that you think the Sponsor should consider to achieve this?	2
Minimising impacts	2
Question 6: Do you expect to be impacted by this airspace change? If so, please describe the expected impact(s).	2
Will you be impacted?	2
Question 7: Are there other general considerations that you would like the Sponsor to consider in order to mitigate impacts?	2
General Impacts?	2
Question 8: Do you support this airspace change?	2
Do you support this airspace change?	2
Why or Why Not?	3
Question 9: In accordance with the UK Civil Aviation Authority’s CAP 1616 airspace change process, consultation responses will be published on Citizen Space via the Airspace Change Portal. Responses will be subject to moderation by the Civil Aviation Authority (CAA). If you wish your response to be published anonymously your personal details (Name, Address & Position) will be redacted and only be seen by the CAA.	
May we publish your responses?	3

Question 1: What is your name?

Name

There were 8 responses to this part of the question.

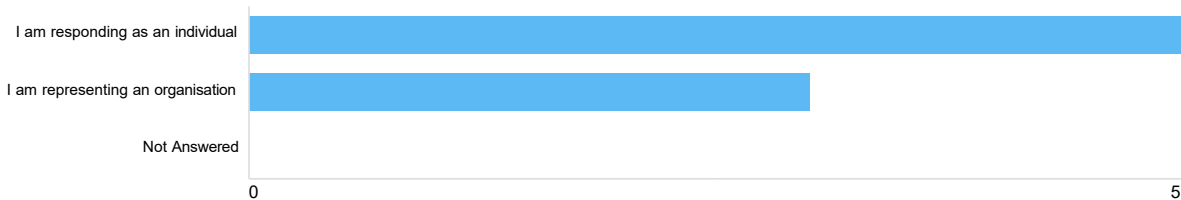
Question 2: What is your email address?

Email

There were 8 responses to this part of the question.

Question 3: Are you responding as an individual or do you represent an organisation?

Individual or Organization



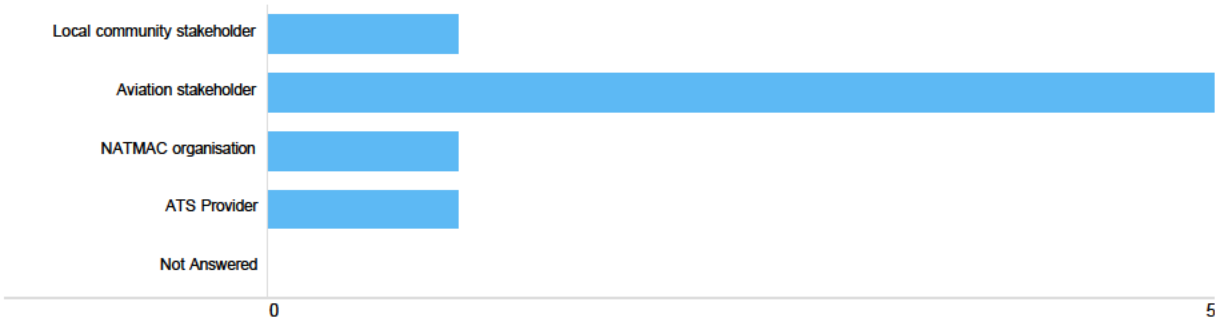
I am responding as an individual	5	62.50%
I am representing an organisation	3	37.50%
Not Answered	0	0.00%

Organisation

There were 3 responses to this part of the question.

Question 4: What best describes your association with this airspace change?

Stakeholder Type



Option	Total	Percent
Local community stakeholder	1	12.50%
Aviation stakeholder	5	62.50%
NATMAC organisation	1	12.50%
ATS Provider	1	12.50%
Not Answered	0	0.00%

Question 5: The Sponsor endeavors to minimise the impact of its operations to other user of the airspace while still ensuring that required military activity can safely and efficiently be conducted. Are there any design amendments or potential mitigations that you think the Sponsor should consider to achieve this?

Minimising impacts

There were 7 responses to this part of the question.

Question 6: Do you expect to be impacted by this airspace change? If so, please describe the expected impact(s).

Will you be impacted?

There were 7 responses to this part of the question.

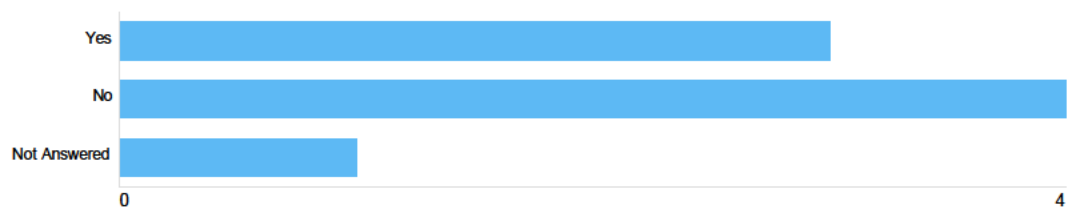
Question 7: Are there other general considerations that you would like the Sponsor to consider in order to mitigate impacts?

General Impacts?

There were 7 responses to this part of the question.

Question 8: Do you support this airspace change?

Do you support this airspace change?



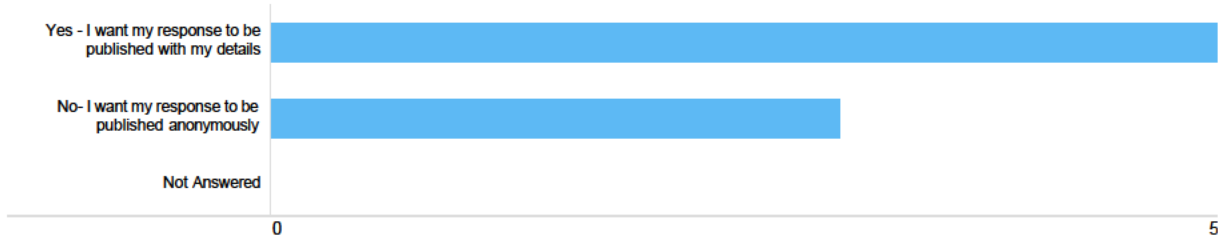
Yes	3	37.50%
No	4	50.00%
Not Answered	1	12.50%

Why or Why Not?

There were 7 responses to this part of the question.

Question 9: In accordance with the UK Civil Aviation Authority's CAP 1616 airspace change process, consultation responses will be published on Citizen Space via the Airspace Change Portal. Responses will be subject to moderation by the Civil Aviation Authority (CAA). If you wish your response to be published anonymously your personal details (Name, Address & Position) will be redacted and only be seen by the CAA.

May we publish your responses?



Option	Total	Percent
Yes - I want my response to be published with my details	5	62.50%
No - I want my response to be published anonymously	3	37.50%
Not Answered	0	0.00%