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Ministry
of Defence

ACP-2023-022

**GATEWAY DOCUMENTATION:
STAGE 1 DEFINE**

**STEP 1B DESIGN PRINCIPLES
AND
STAKEHOLDER ENGAGEMENT**

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Roles

Action	Role	Date
Produce	Airspace Change Team UAS CDC	31 Jan 2024
Review	DAATM	05 Feb 2024
Approve	Change Sponsor RAF AIR Cap	08 Feb 2024

Drafting and Publication History

Issue	Date	Change Summary
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Executive Summary

The Change Sponsor conducted stakeholder analysis to ensure they effectively engaged with all potential stakeholders over the Design Principles (DPs).

Stakeholders were engaged in writing and included:

County, District and Parish councils

Selected national and local organisations

Local General Aviation (including aerodrome operators)

Commercial aerodrome operators

National Air Traffic Management Advisory Committee members

The Change Sponsor attended a local airspace user's forum during the Stage 1 engagement period, enabling exposure to information pertaining to the introduction of Protector, the requirement for a nominated airfield and the potential airspace change at Royal Air Force (RAF) Marham.

The major theme in the feedback received was concern that the change proposal would restrict freedom of manoeuvre for aviators wishing to access the RAF Marham Military Air Traffic Zone (MATZ) and overhead. An additional concern was a perceived potential for reduction in safety due to the introduction of a new activity.

Full details of engagement can be found later in this document, including queries that have not resulted in a DP change.

As a result of the engagement, minor adjustments were made to some of the DPs.

Introduction

The Ministry of Defence (MOD), specifically RAF Air Capability, is the Change Sponsor for this proposal. The proposal seeks to establish suitable airspace to enable Protector RG Mk1 safe and efficient access to a nominated diversion airfield.

The purpose of this document is to demonstrate that the Change Sponsor has followed Civil Aviation Publication (CAP1616) airspace change process. It forms part of the overall requirements for the Stage 1 Define Gateway, Step 1B - Design Principles (DPs). It should be noted that following a review of the CAP1616 airspace change process, the CAA has issued version 5 of CAP1616, which was implemented on Tuesday 2nd January 2024. However, since preparations for Stage 1 of this Airspace Change Proposal (ACP) were underway prior to the publication, the CAA agreed that the Change Sponsor should continue in accordance with the version 4 of CAP1616 for this stage only. All further stages of the ACP will follow the revised process¹.

As described in Annex D to CAP1616, V 4.0, the Change Sponsor has engaged with a range of potential stakeholders to seek their views on the change proposal DPs and collect feedback as to what is important to them regarding the proposal in terms of DPs only.

It is vital to assure stakeholders that they are included in the change process and that they are able to influence the design. Stakeholder feedback on the proposed DPs has been analysed and summarised in this document to describe how all comments submitted have been incorporated into finalised DPs. The finalised DPs will be employed in the development of airspace design options.

Report Structure

Section 1 - Engagement. Engagement included a representative group of aviation and local community stakeholders. This section summarises:

- How and why stakeholders were identified;
- How stakeholders were engaged;
- The engagement chronology.

Section 2 – Design Principles. The DPs were finalised after considering stakeholder feedback. This section describes:

- The initial set of DPs offered by the Change Sponsor;
- A summary of the feedback and how the DPs were adapted;
- How the DPs were prioritised.

Section 3. Next steps in the airspace change proposal.

¹ CAP1616 Version 4 can be found at [CAA Airspace Change Doc_Mar2021.pdf](#); CAP1616 Version 5 can be found at [CAP1616 - Airspace Change Process \(caa.co.uk\)](#)

Section 1 - Engagement

Stakeholder Identification.

Initial airspace options development will be focussed on the area surrounding RAF Marham, as highlighted by the image below², which has been selected as the permanent diversion airfield for Protector.



Figure 1: Area identified by the Change Sponsor as the likely area of impact for ACP-2023-022

Under a separate airspace change proposal (identification number ACP-2023-047³), an airspace trial is already being proposed at RAF Marham in the form of a Temporary Danger Area (TDA). The airspace trial seeks to confirm the suitability of RAF Marham as the permanent diversion airfield for Protector and will also inform the development of this ACP. Therefore, the area potentially affected for the airspace trial and the permanent solution are the same. The MOD selected stakeholders for the airspace trial from an area within a radius approximately 20 miles of RAF Marham.

It was pertinent that aviation stakeholders contacted as part of the airspace trial were subsequently invited to consider the DPs for the permanent airspace proposal; these included General Aviation (GA) aerodromes, GA operators, commercial airports and National Air Traffic Management Advisory Committee (NATMAC) representatives.

In addition to stakeholders identified for the airspace trial, research was undertaken in the defined areas to identify local authorities, and other entities potentially affected⁴. Local authority engagement was conducted at county, district and parish level.

² This image was uploaded to the CAA Airspace Change Portal to aid in the identification of stakeholders, it does not represent the actual proposed airspace

³ Details of the temporary change can be found on the CAA ACP Portal [here](#).

⁴ Local authorities were not required to be consulted as part of the airspace trial ACP (iaw CAP1616, V 4.0).

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was thought to be important as this is the level at which planning committees sit. Parish councils sitting within the immediate vicinity of RAF Marham only were targeted at this stage, but parish councils from a wider area could be approached for engagement, if appropriate, once the design options are known.

The following stakeholders⁵ were identified either by scrutiny of aeronautical charts; through communication with the Secretary of the East Anglia Airspace Users Working Group (EAAUWG) who provided a list of the group's civilian members⁶ and subsequently forwarded the Change Sponsor's initial engagement on its behalf; research via government websites⁷; recommendations provided by RAF Marham Media Communications Officer (MCO).

Aviation Stakeholders		
All NATMAC Members	Fenland Airfield	Osprey
Boughton North	Fenland Flying School	Priory Farm Tibenham
Boughton South	Fersfield Airfield	Seething
Cambridge Airport	Fersfield Flying Club	UAV Norwich Police
Cambridge Gliding	Fersfield Flying Group	Helicentre Aviation (Pipeline Inspection)
Chatteris	GASCO	Heli Air (Pipeline inspection)
Drone Training	Ludham airfield	PDG Helicopters
Duxford	McCaully flying group	National Grid (Powerline inspection)
East Anglia Air Ambulance	Norfolk gliding club	Drone Wars - Chris Coles
East Winch	Norwich Airport	
Felthorpe Airfield	Old Buckenham Airfield	

Local Authority Stakeholders		
Norfolk County Council	Barton Bendish Parish Council	Natural England
Kings Lynn and West Norfolk District Council	Shouldham Parish Council	County Land and Business Association
Breckland District Council	Fincham Parish Council	Campaign to Protect Rural England (CPRE)
Marham Parish Council	Narborough Parish Council	County Land and Business Association
Boughton Parish Council	The Wash and North Norfolk Marine Partnership	Police and Crime Commissioner for Norfolk
MP for SW Norfolk	Environment Agency	Wash & North Norfolk Conservation

Engagement methods.

Existing and potential stakeholders were approached by written communication for their feedback on the DPs. It was assessed that in-person drop-in sessions were unnecessary at Stage 1 of the ACP due to the nature of feedback already received on the airspace trial engagement, as well as there being an EAAUWG event taking place mid-way through the DPs engagement period. Those aviation stakeholders that contributed to the airspace trial design are members of the EAAUWG. It was felt that in-person engagement would be better organised for Stage 2 of the ACP for a wider audience when more details are known regarding the permanent design options, tempo of operations and any conclusions of the airspace trial.

⁵ Additional stakeholders to those already contacted for the Trial ACP engagement were approached after their details had been provided by other stakeholders, annotated in green text. This included a number of individuals that were added to existing groups/organisations.

⁶ The Secretary of EAAUWG obtained permission from all civilian members for their email address to be shared with the ACP Manager.

⁷ [Find your local council - GOV.UK \(www.gov.uk\)](http://www.gov.uk); [Parish councils contact details \(west-norfolk.gov.uk\)](http://west-norfolk.gov.uk)

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Written communication. An initial email introducing the ACP was sent, along with a letter containing details of the draft DPs and an explanation about how and why we would like to engage with stakeholders for feedback on the proposal. The letter included details on how to leave feedback or pose questions via direct email address. Due to the limited number of responses received, a reminder for feedback was sent towards the end of the engagement period.

Attendance at and presentation to the EAAUWG. The Change Sponsor's ACP Manager attended the EAAUWG at RAF Marham on 16 Jan 2024 and delivered a presentation containing information about the Protector programme and associated ACPs. A comprehensive brief on the ACP process was provided, including the means by which stakeholders would be able to assist with and/or influence any potential airspace design. Face-to-face engagement with interested stakeholders was managed at the meeting. A return visit to the next EAAUWG is anticipated in June/July 2024 where an update will be given.

Engagement chronology. The table below details the DPs engagement activity undertaken.

Date	Action / Stakeholders Contacted	Notes
1 Nov 2023	SON V2.0 published on CAA ACP portal.	
2 Jan 2024	All NATMAC members.	Email and covering letter-Draft design principles.
2 Jan 2024	Local authority and organisations stakeholders.	Email and covering letter-Draft design principles.
2 Jan 2024	Local aviation stakeholders.	Email and covering letter-Draft design principles.
16 Jan 2024	All attendees at the EAAUWG at RAF Waddington (mix of 50 military and civilian airspace users).	PPT presentation on the Protector programme, the airspace trial, the requirement for a permanent diversion airfield and the associated airspace change process.
3 Jan – 30 Jan 2024	Responding to enquiries, emails and telephone calls.	Response was submitted by 13 organisations or individuals regarding the potential airspace change. Of these, 5 declared no comment at this stage.
25 Jan 2024	All Stakeholders	Email reminder for feedback on Draft design principles.
2 Jan 2024	Stakeholders that provided feedback on the DPs	Email to present amended DP with rationale following feedback received.

Feedback out of scope. There were responses received from 8 stakeholders that contained queries or suggestions out of scope in terms of addressing the suitability of the DPs. These were addressed by return of email and included:

- A request for information on the impact on the local public as a result of the airspace;
- Anticipated procedures for flights to and from an airstrip within the RAF Marham MATZ;
- Clarification regarding whether arrangements agreed as part of the airspace trial to facilitate movements to/from an airfield within the MATZ would be continued with the proposal of a permanent Danger Area (DA);

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- A request to allocate a frequency or telephone number to allow emergency service helicopters to coordinate transit through the airspace;
- Concern that the MOD is implementing RPAS operations without enabling the available Detect And Avoid (DAA) technology;
- Objection to the way the MOD has implemented an ACP separate to the recently established, operationally linked, DA at the Main Operating Base (MOB), RAF Waddington.
- A resubmission was received containing feedback previously provided for the airspace trial ACP-2023-047.
- A request for airspace to revert to Class G when not in use.
- Preference expressed regarding the technical specification of the air system to allow integrated of operation in Class G airspace.
- Concerns was raised that a lack of RPAS integration policy is leading to a requirement to establish segregated airspace for this type of operation. It was expressed this is likely to lead to cause impact to other stakeholders undermining the intent of DP4.
- It was suggested that if airspace segregation due to Protectors' inability to see and avoid is deployed into other airspace structures, the concept could lead to a disproportionate blocking of airspace compared to task.

Once the Change Sponsor had rationalised the final set of proposed DPs, they were presented to stakeholders for acceptance or additional discussion. No further comments were received. All engagement material and written communication is evidenced at Appendix C –raw Engagement Evidence.

Section 2 – Design Principles

Draft DPs.

To provide a start point and initiate a discussion on DPs, a list of draft DPs was offered during engagement.

The concept of a 'long list' was rejected to avoid complexity. Furthermore, a review of this approach found that these majored on Environmental Impact principles for commercial traffic. Given the provisional work undertaken for the airspace trial ACP, it was assessed that environmental impacts could be accounted for under a single DP to minimise the impact on other aircraft (DP4), which was considered appropriate to this stage in the process and could be developed in detail at later stages.

The draft DPs initially offered are in the table below:

Ref	Category	Design Principle	Initial Rationale
DP1	Safety	The airspace change proposal must maintain a high standard of safety and should seek to enhance current levels of safety.	Safety to airspace users is paramount to any airspace change. RAF Marham is currently located in Class G airspace, and the rules of air do not allow Remotely Piloted Air System (RPAS) Beyond Visual Line of Sight (BVLOS) operations in Class G to support the safe operation of Protector. Therefore, it is necessary to implement some form of segregated airspace to ensure the safe operation of Protector.
DP2	Technical (MOD requirements)	The airspace provides access to a sufficient area to meet operational and training objectives.	The area required must be sufficient in shape and size to access RAF Marham when required for operational and training purposes (in support of ops from its Main Operating Base (MOB), RAF Waddington).
DP3	Technical (Accessibility for airspace users)	The airspace change proposal should consider the requirements of other airspace users by maximising accessibility to other airspace users	Implementation of airspace for RPAS activity elsewhere has illustrated that enabling access to such airspace for other airspace users is an important part of any airspace design.
DP4	Environment (Other aviation stakeholders)	The airspace change proposal should consider the impacts on air navigation service providers and other aviation stakeholders such as nearby airport operators.	Implementation of airspace for RPAS activity elsewhere has illustrated that minimising impact to other airspace users is key.

DP5	Policy	The airspace change proposal should not be inconsistent with relevant legislation, the CAA's airspace modernisation strategy or Secretary of State and CAA's policy and guidance.	The MOD wishes to make it clear that it has no intention of introducing new airspace regulation for the integration of Protector into UK airspace.
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DP Evolution.

A total of 3 stakeholders submitted feedback in scope for developing the DPs. Relevant comments were collated and arranged under the related draft DPs in a DP matrix (at Appendix A). All comments were reviewed and responded to. Where a suggested change to the draft DP was accepted or rejected, this was annotated and a revised DP was proposed where applicable.

Stakeholder 2⁸ queried the absence of an environmental DP, but did not put forward a suggestion. In response, the Change Sponsor confirmed that in accordance with guidance laid out in CAP1616h, the MOD will complete an environmental assessment during Stages 2 – 4 of the process⁹.

DP1. The airspace change proposal must maintain a high standard of safety and should seek to enhance current levels of safety.

Stakeholder 2 queried the need for a permanent airspace solution and whether the irregular use of a diversion facility aligned with DP1 (and DP3). The Change Sponsor responded to explain DP1 relates to operating Protector safely in UK airspace iaw regulation, whilst maximising access for other airspace users to the proposed airspace. It was assessed that DP 1 did not require rewording as a result of the feedback.

Stakeholder 1 suggested that the activity that is being introduced by the MOD slightly reduces the level of safety, and there is no justification for using an ACP to enhance current levels of safety, but must maintain the current standard of safety. After some consideration, the Change Sponsor concluded it may not be possible to measure current levels of safety to use as evidence to support that the airspace design(s) will maintain or enhance safety levels. A high standard of safety through design is a more viable basis for meeting the Statement of Need. Furthermore, the Change Sponsor felt that in this instance, the objective is to safely integrate a new asset; therefore, seeking to enhance safety of current operations may not be achievable and the DP wording was adjusted to reflect this.

Revised DP1. The airspace change proposal must maintain a high standard of safety and should seek to enhance levels of safety, wherever possible.

DP2. The airspace provides access to a sufficient area to meet operational and training objectives.

⁸ Stakeholders have been numbered in line with the DP Matrix

⁹ Whilst the DP was originally in the environmental category. See DP4 evolution where the Change Sponsor proposed amendment of this DP to the Technical category.

Stakeholder 1 considered that the ACP is justified as a contingency diversion requirement, but felt that training will change the utility of the proposed danger area and queried what training objectives were intended. The Change Sponsor was able to confirm training objectives are yet to be quantified, but it expected that training will be in the form of infrequent sorties and for practise diversion only. Maximum use of synthetic training will be made, which will in turn keep live training to a level in accordance with minimum requirements. ,

Stakeholder 3 suggested a simplification in wording to 'The airspace design must meet operational and training objectives'. The stakeholder felt this would aid meaningful comparison of airspace designs at DP Evaluation (DPE). The Change Sponsor considered this at length and decided to retain the original DP wording, since the suitability of area shape and size is key; operational and training objectives will be articulated clearly for transparency and consistency in the DPE.

No revision proposed.

DP3. The airspace change proposal should consider the requirements of other airspace users by maximising accessibility to other airspace users.

Stakeholder 2 queried the need for a permanent airspace solution and whether the irregular use of a diversion facility aligned with DP3 (and DP1). As stated above at DP 1, the Change Sponsor responded to explain DP3 relates to operating Protector safely in UK airspace iaw regulation, whilst maximising access for other airspace users to the proposed airspace.

Stakeholder 1 believed that the ACP implies a significant volume of restricted access airspace and suggested the ACP should address, rather than consider, the requirements of other airspace users and maximise accessibility by other airspace users. The Change Sponsor deemed it may not be possible to **address** requirements of airspace users (particularly as all airspace user requirements may not yet be known). All airspace user requirements brought to the attention of the Change Sponsor will be taken into consideration and accommodated wherever possible.

Stakeholder 3 proposed two alternative narratives for DP3:

- a. 'The airspace design should minimise the impact on other airspace users';

The Change Sponsor addresses this in DP4 and wishes to maintain two separate DPs for accessibility and impact.

- b. 'The airspace change proposal should satisfy the requirements of operators and owners of all classes of aircraft, including general aviation and other civilian airspace users' (the discretionary design principle (DDP4) from page 20 of CAP1616F)

The Change Sponsor may not be able to **satisfy** the requirements of operators and owners of all classes of aircraft, including general aviation and other civilian airspace users. Rather the Change Sponsor has proposed maximising accessibility (DP3) and minimising impact (DP4). That said, the Change Sponsor elected to simplify the DP text.

Within their additional comments, Stakeholder 3 also stressed that the airspace required to support diversionary requirements should only be active for the minimal amount of time to achieve that objective in accordance with the principles of Flexible Use Airspace. The Change Sponsor felt this will be addressed by DP4.

Revised DP 3. The airspace design should endeavour to maximise accessibility for other airspace users.

DP4. The airspace change proposal should consider the impacts on air navigation service providers and other aviation stakeholders such as nearby airport operators.

Stakeholder 1 noted that other aviation stakeholders include operators not based on an airport, for example airfields and airstrips. The Change Sponsor agreed that airfields, airstrips and air vehicle operators should not be discounted, as these groups are already identified stakeholders through the airspace trial ACP-2023-047. Revised DP to consider **all** airspace users.

Stakeholder 2 queried the absence of an environmental DP, but did not put forward a suggestion.

Stakeholder 3 challenged the categorisation of ‘Environment’ for DP4, given that the context is for matters such as noise and CO2 rather than the operating environment. Instead, they proposed DP4 should be categorised Technical’. The Change Sponsor agreed. The stakeholder also noted that potential re-categorisation would leave no environmental DP for this ACP. Whilst required to complete an environmental assessment during stages 2 – 4 of the CAP1616 process and bearing in mind the nature of this ACP, the Change Sponsor (as MOD) is not proposing specific benefit to the environment. The lack of any other environmental DP is therefore thought acceptable.

Revised DP4 (to Technical Category). The airspace change proposal should consider the impacts on all airspace users.

DP5. The airspace change proposal should not be inconsistent with relevant legislation, the CAA’s airspace modernisation strategy or Secretary of State and CAA’s policy and guidance.

Stakeholder 3 observed that ‘whilst the DP itself is intending to demonstrate alignment with the Airspace Modernisation Strategy (AMS), the proposed solution does not’. This stakeholder makes reference to the proposed solution not being aligned with the AMS. The Change Sponsor is keen to retain this DP and explore options to meet the AMS during CAP1616 stages 2-4.

No revision proposed.

Selected DPs

The table below contains the final set of DPs adopted¹⁰, including rationale behind the decisions. Appendix A contains the DP Matrix illustrating the evolution of the process.

Ref	Category	Design Principle	Decision Rationale
DP1	Safety	The airspace change proposal must maintain a high standard of safety and should seek to enhance levels of safety, wherever possible.	This DP was taken from CAP 1616 V5 ¹¹ Rather than delete ‘should seek to enhance levels of safety’, the Change Sponsor has inserted qualifying text ‘wherever possible’. This is to acknowledge that safety remains the MOD top priority, however, this ACP is not seeking to enhance current levels.

¹⁰ Alterations in bold text

¹¹ This ACP is not required to adhere to CAP 1616 V5 for Stage 1.

DP2	Technical (MOD requirements)	The airspace provides access to a sufficient area to meet operational and training objectives.	No revision proposed.
DP3	Technical (Accessibility for airspace users)	The airspace design should endeavour to maximise accessibility for other airspace users.	Simplified text.
DP4	Technical (Impact for airspace users)	The airspace change proposal should consider the impacts on all airspace users.	Switched to Technical category. Following feedback, amended to 'all airspace users' to encompass a broader range of stakeholders.
DP5	Policy	The airspace change proposal should not be inconsistent with relevant legislation, the CAA's airspace modernisation strategy or Secretary of State and CAA's policy and guidance.	N/A: No revision proposed.

DP Prioritisation Summary

The Change Sponsor received three comments regarding the prioritisation of the DP, one¹² of which was in support of the order proposed. The method of determining the DPs order of prioritisation has been determined by the comments received, not just upon the volume of responses. It is anticipated in CAP1616 that DPs may conflict or that some would be more important to one organisation than another.

Safety is the highest priority and so DP1 is automatically assigned Priority 1: This was not contested in any of the feedback received.

Stakeholder 2 suggested DP2 warranted a lower priority than DP3 and DP 4 as it relates to a diversion facility. However, after consideration, the Change Sponsor elected to retain DP2 as a higher priority than DP3 and DP4 due to the necessity of airspace suitable in size and shape to enable Protector to complete its training and operational objectives.

Stakeholder 3 considered DP 2, DP 3 and DP4 should have the same priority. DP2 remained second priority as outlined above. Since there was no feedback from local airspace users distinguishing the order of priority between DP3 and DP 4, the prioritisation of these DPs was altered and both were allocated priority 4.

¹² This respondent submitted no further comment on the DPs

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- Stakeholder 3 noted the text for DP 5 is the same as MDP3 on p20 of CAP1616F and implied it should have the same priority as DP1. In allocating priorities the Change Sponsor believes that DP 1 and DP 2 remain their highest priorities. That said, in acknowledging Stakeholder 3 comments, the Change Sponsor had elevated DP5 above DP 3 and DP4.

The prioritisation is summarised as follows:

Priority	Ref	Design Principle
1	DP1	The airspace change proposal must maintain a high standard of safety and should seek to enhance levels of safety, wherever possible.
2	DP2	The airspace provides access to a sufficient area to meet operational and training objectives.
3	DP5	The airspace change proposal should not be inconsistent with relevant legislation, the CAA's airspace modernisation strategy or Secretary of State and CAA's policy and guidance.
4	DP3	The airspace design should endeavour to maximise accessibility for other airspace users.
	DP4	The airspace change proposal should consider the impacts on all airspace users.

Section 3 – Next Steps

This document will be submitted to the CAA as evidence to support Step 1B of the CAP1616 airspace change process.

This will complete the documentary evidence for the Stage 1 Assessment Gateway (document deadline 8 Feb 2024, for the CAA’s Assessment Gateway scheduled for 29 Feb 2024).

Timeline. The planned CAP1616 timeline is as follows:

CAP1616 Gateway	Planned Date
Stage 1 – Define	29 Feb 24
Stage 2 – Develop & Assess	26 Apr 24
Stage 3 – Consult	31 May 24
Stage 4 – Update and Submit ACP	23 Sep 24
Stage 5 – Decide	13 Jan 25
Stage 6 - Implement	AIRAC 04/25

APPENDIX A – DESIGN PRINCIPLES MATRIX

DP#	Initial Cat	Initially Proposed DP	Feedback					
			Stakeholder 1	Stakeholder 2	Stakeholder 3			
			[REDACTED]	[REDACTED]	[REDACTED]			

DP1	Safety	The airspace change proposal must maintain a high standard of safety and should seek to enhance current levels of safety	The activity that is being imported by the MoD slightly reduces the level of safety. There is no justification for using an ACP to <i>enhance</i> current levels of safety - the ACP must maintain the current standard of safety.	The need for a permanent airspace solution, rather than activation by NOTAM when required, for what is a diversion facility and thus not in regular use, is not clear and appears to go against DP1 and DP3.	No comment	The airspace change proposal must maintain a high standard of safety and should seek to enhance levels of safety, wherever possible.	This DP was taken from CAP 1616 V5 Rather than delete 'should seek to enhance levels of safety', the Change Sponsor has inserted qualifying text 'wherever possible'. This is to acknowledge that safety remains the MOD top priority, however, this ACP is not seeking to enhance current levels.	Safety
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<p>DP2</p>	<p>Technical (MOD requirements)</p>	<p>The airspace provides access to a sufficient area to meet operational and training objectives.</p>	<p>The ACP is justified as a contingency diversion requirement. As training will change the utility of the proposed danger area, what training objectives does the MoD have in mind?</p>	<p>DP2, as it relates to a diversion facility would appear to warrant a lower priority than DP3 and DP4</p>	<p>Could be simplified/shortened to: The airspace design must meet operational and training objectives. This allows for meaningful comparison of airspace designs at the DPE stage, where amber partially meets the objectives and green fully meets the objectives. However, the ACP must also make clear those objectives (headline bullets rather than details), so the red/amber/green DPE decision (in stage 2) is transparent and consistently applied. This should be one step lower in priority than the Safety DP.</p>		<p>N/A: No revision proposed.</p>	<p>Technical (MOD requirements)</p>
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<p>DP3</p>	<p>Technical (Accessibility for airspace users)</p>	<p>The airspace change proposal should consider the requirements of other airspace users by maximising accessibility to other airspace users.</p>	<p>The ACP implies a significant volume of restricted access airspace. The ACP should <i>address</i> the requirements of other airspace users and maximise accessibility by other airspace users.</p>	<p>The need for a permanent airspace solution, rather than activation by NOTAM when required, for what is a diversion facility and thus not in regular use, is not clear and appears to go against DP1 and DP3.</p>	<p>The two clauses in the sentence of the original wording don't really work together. Could be simplified/shortened to: The airspace design should minimise the impact on other airspace users. Or, use the discretionary design principle (DDP4) from page 20 of CAP1616F: The airspace change proposal should satisfy the requirements of operators and owners of all classes of aircraft, including general aviation and other civilian airspace users. This should have the same priority as DP2</p> <p>The airspace required to support diversionary requirements should only be active for the minimal amount of time to achieve that objective in accordance with the principles of Flexible Use Airspace.</p>	<p>The airspace design should endeavour to maximise accessibility for other airspace users.</p>	<p>Simplified text</p>	<p>Technical (Accessibility for airspace users)</p>
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<p>DP4</p>	<p>Environment (Other aviation stakeholders)</p>	<p>The airspace change proposal should consider the impacts on air navigation service providers and other aviation stakeholders such as nearby airport operators.</p>	<p>Other aviation stakeholders include operators not based on an airport, for example airfields and strips.</p>	<p>There is no DP that relates to the Environment?</p>	<p>This DP is not in the CAP1616F "Environment" category, given that the context is for matters such as noise and CO2 rather than the operating environment. Instead, DP4 should be declared "Technical". The text is otherwise the same as DDP5 on p20 of CAP1616F. This should have the same priority as DP2. There are some concerns that a lack of RPAS integration policy is leading to a requirement to establish segregated airspace for this type of operation. This mere fact is likely to lead to cause impact to other stakeholders undermining the DP's intent</p>	<p>The airspace change proposal should consider the impacts on all airspace users.</p>	<p>Switched to technical category. Following feedback, amended to 'all airspace users' to encompass a broader range of stakeholders.</p>	<p>Technical (Impact for airspace users)</p>
<p>DP5</p>	<p>Policy</p>	<p>The airspace change proposal should not be inconsistent with relevant legislation, the CAA's airspace modernisation strategy or Secretary of State and CAA's policy and guidance.</p>	<p>No comment.</p>	<p>No comment</p>	<p>This text is the same as MDP3 on p20 of CAP1616F. This implies it should have a high priority, thus should have the same priority as DP1 Safety. Integration is Element 4 of the AMS. Whilst the DP itself is intending to demonstrate alignment with the AMS, the proposed solution does not.</p>		<p>N/A: No revision proposed</p>	<p>Policy</p>

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APPENDIX B – EAST ANGLIA AIRSPACE USERS WORKING GROUP: ACP PRESENTATION

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Updates on MOD Airspace Change Proposals ACP-2023-047 & ACP-2023-022


Unmanned Air Systems Capability Development Centre

Airspace Integration for Protector RG Mk1 presentation to the EAAWG
16 Jan 2024

Protector RG Mk1 Remotely Piloted Air System (RPAS)

- Main Operating Base RAF Waddington
- Training areas all around UK eventually
- Limited Detect and Avoid (DAA)
- Aircrews are located on the ground
- Certification
- Segregation required



Protector RG Mk1 Remotely Piloted Air System (RPAS)

UK MAA Regulation:

- MAA Regulatory Publications (MRP) - RA 2320 – MAA regulation for operation of military RPAS. The RA states the criteria for **beyond visual line of sight (BVLOS)** RPAS operation such that within UK airspace, BVLOS operations should:
 - An appropriately **approved Detect and Avoid (DAA)** capability enables compliance with Rules of the Air appropriate to the class of airspace, or;
 - They are flown using a Layered Safety Approach that specifically requires flight in **Segregated Airspace**, or in Controlled Airspace (Classes A-D) with the informed consent of the Air Navigation Services Provider (ANSP) .

Key Protector Performance Data

Cruise speed: 165kts
Max Speed: 210kts
Climb Rate: Surface to FL200;
1200fpm and above FL200:
640fpm
Descent Rate: 600 – 1100fpm
Turn Radius: 2nm
Glide Ratio: 3.5nm/1000ft

- Will be a certified aircraft by the MAA in exactly the same way as a Manned Aircraft is certified today.
- Can aviate, navigate and communicate in the same way as a conventionally flown aircraft.
- Can respond to Air Traffic Control (ATC) instructions and clearances, accept Secondary Surveillance Radar codes and any ATC deviations.
- Will be controlled at all times by RAF qualified pilots from a Certified Ground Control System at RAF Waddington.

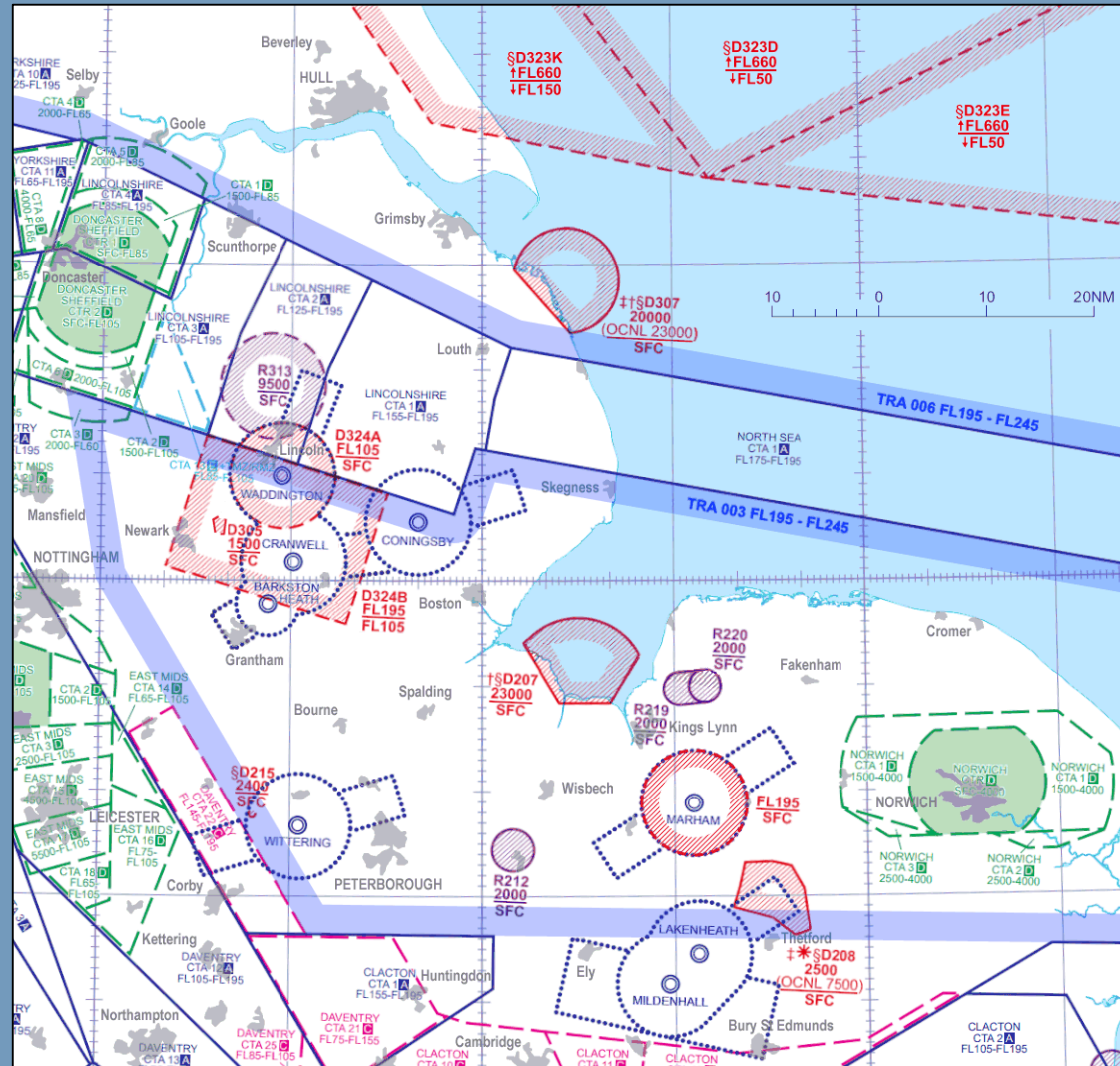
Airspace Change Process – CAP1616



All changes to airspace in the UK must follow the CAP1616 process

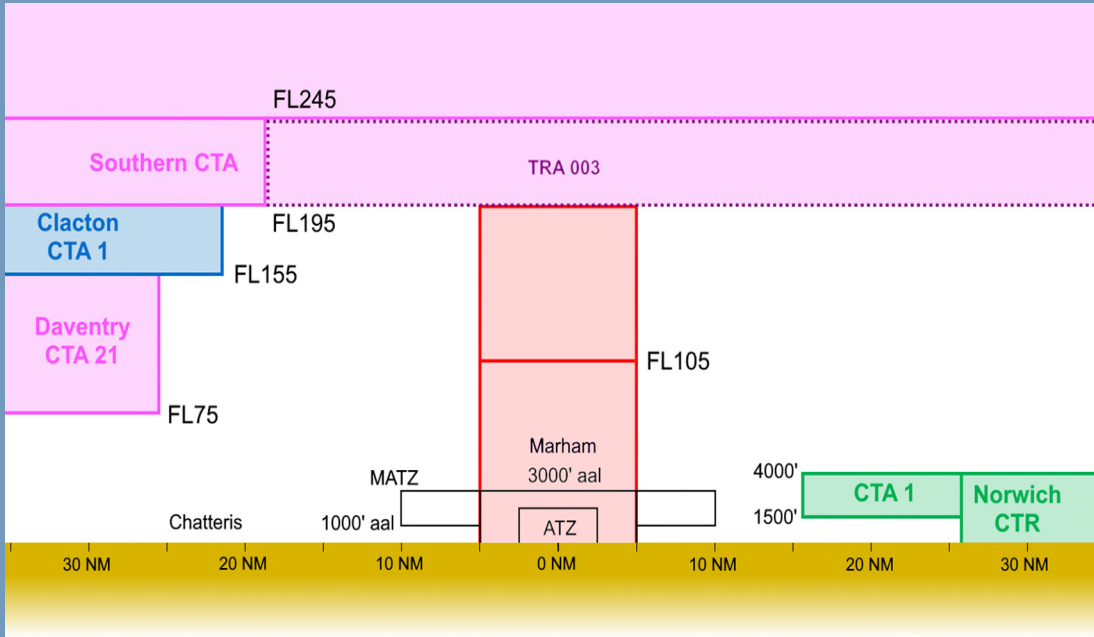
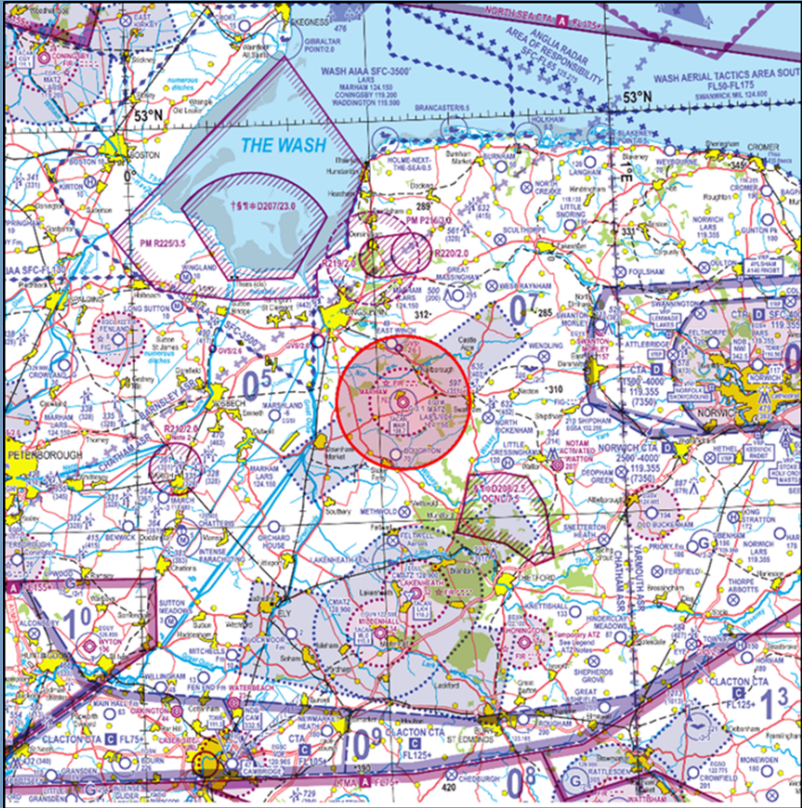
- Permanent changes follow a 7 stage process – 24 months
- Temporary changes follow a scaled down version – 6 months

Protector operating area(s) – why Marham?



2 Separate changes in train

- ACP-2023-047 – temporary structure of airspace to be implemented over Marham May – Aug 2024 to trial the proposed airspace:
- ACP-2023-022 – permanent structure to follow once trial has completed



ACP-2023-047 - Aim

To introduce a volume of airspace in the form of a TDA overhead RAF Marham to enable the MOD to demonstrate that the airspace, associated procedures and infrastructure at RAF Marham will provide a suitable diversion airfield capability for both Protector UK test and evaluation (T&E) activity and later in-service operations.

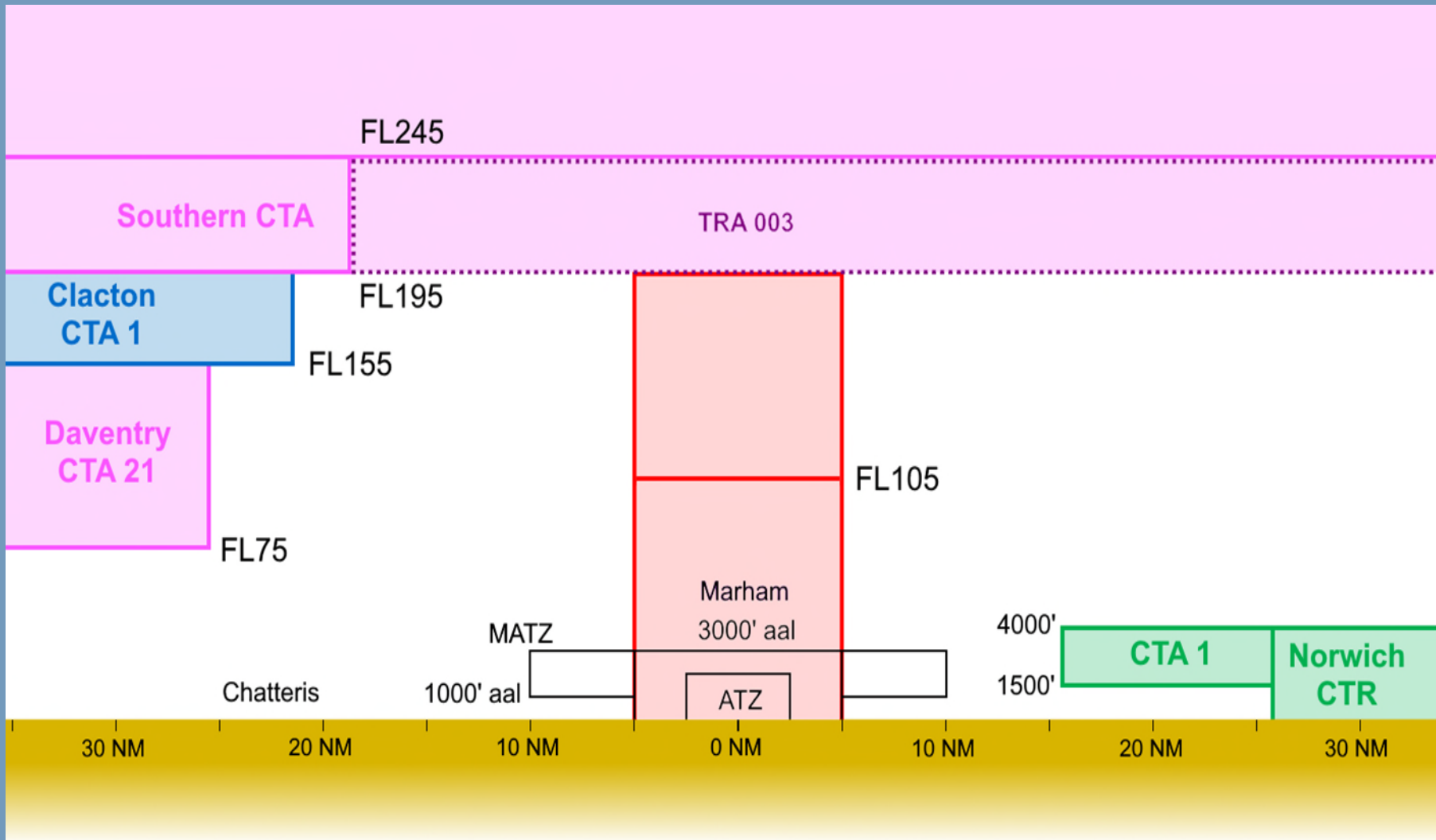
ACP-2023-047 – Progress Update

Engagement on the TDA highlighted 3 main areas for consideration:

- Amendment to LOAs
- Suggested airspace classification designated Class C. Ruled out in order to;
 - Maintain FUA, particularly during the many hours/days that Protector is not scheduled to fly.
 - Avoid the additional air traffic resource required to manage Class C.
 - Avoid placing restrictions on other airspace users in terms of having to carry radio etc.
- Impact on access to/from airfields located within the TDA.

A vertical internal division has been incorporated following stakeholder feedback





ACP-2023-047 – Planned Ops

- Up to 2 planned diversions to RAF Marham will be conducted in the period 16 May – 31 August 2024.
- Each diversion profile will involve an arrival and departure from RAF Marham.
- Important to note: the TDA will need to be active for all Protector flying, including sorties from RAF Waddington when a planned diversion is not expected (i.e. the TDA may be active but not necessarily used).

ACP-2023-047 – Airspace Management

- Operating Authority - Marham ATC.
- A DACS will be available during TDA hours of activation from Marham ATC.
- A DAAIS will be available from Marham ATC during TDA hours of activation and ATC opening hours. London Information will also provide a DAAIS on 124.6MHz.
- The MOD will activate the airspace structures only as and when Protector planned to fly (at Waddington).
- Some revised LOAs issued by Marham ATC 8 Jan 2024.

ACP-2023-047 – Timeline

TDA submitted – 12 Jan 2024

CAA Decide – 9 Feb 2024

Implementation – 18 May to 31 Aug 2024

ACP-2023-022 – Statement of Need

When the large RPAS Protector RG Mk1 comes into service it will require a diversion aerodrome for the eventuality that the RPAS is unable to be recovered to its main operating base at RAF Waddington. Pursuit of an ACP optimises an approach to establish suitable airspace to enable safe and efficient access to a **nominated diversion airfield** in the event that a diversion is required. Given the anticipated performance of on-board systems and the surrounding airspace classification, this approach will support the safe integration of Protector further into the national airspace structures and in accordance with current military flying regulation.

ACP-2023-022 – Aim

- Establish a permanent DA to facilitate RAF Marham as the enduring nominated diversion airfield.
- The airspace structure is anticipated to be very similar, if not identical, to the TDA proposed in ACP-2023-047.
- The airspace will only be utilised:
 - For actual diversion in the unlikely event that RAF Waddington is unavailable or unsuitable for landing;
 - for practice diversion training – tempo yet to be confirmed, but anticipated to be infrequent.
- If effective, airspace management procedures implemented for the TDA are anticipated to be maintained.

ACP-2023-022 – Progress Update and Timeline

- Stage 1 - DEFINE
In progress – To agree with stakeholders the Design Principles on which the ACP will be assessed and progressed.
Engagement ends 30 Jan 2024.
CAA Gateway: 29 Feb 2024
- Stage 2 - DEVELOP & ASSESS
CAA Gateway: 26 Apr 2024
- Stage 3 - CONSULT
CAA Gateway: 31 May 2024
- Stage 4 - Formal ACP SUBMISSION
23 Sep 2024
- Stage 5 - CAA DECIDE
13 Jan 2025
- Airspace implementation
April 2025

QUESTIONS?

OFFICIAL

APPENDIX C – RAW ENGAGEMENT EVIDENCE

C-1

OFFICIAL

Archived: 06 February 2024 23:29:10

From:

Bcc:

Subject: UC Reminder: UC ACP-2023-022 Engagement Letter - Stage 1

Importance: Normal

Sensitivity: None

Attachments:

[ACP-2023-022 Engagement Response Form - Stage 1.docx](#);

Dear sir or madam,

This is a gentle reminder that feedback is encouraged regarding the suggested Design Principles for the airspace proposed at ACP-2023-022. If you do have any comments, and have not already done so, please send them by return of email by Tuesday 30 January 2024.

Kind regards.

Defence UAS Capability Development Centre



P Please consider the environment before printing this email.

From: UAS CDC-ACP

Sent: 02 January 2024 17:46

Subject: UC ACP-2023-022 Engagement Letter - Stage 1

Dear NATMAC member,

You are a key stakeholder in the Civil Airspace Publication (CAP) 1616 process for ACP-2023-047, which proposes segregated airspace at RAF Marham in the form of a Temporary Danger Area (TDA). Key aviation stakeholders were approached late last year for feedback on the temporary change.

The Change Sponsor is the MOD and is writing to you again with details of the first stage in the proposal of a permanent solution at RAF Marham in the form of a Danger Area (DA), to enable Protector to access RAF Marham as a nominated diversion

airfield.

Full details of this proposed airspace change for Protector are included in an engagement letter which has been uploaded today to the CAA ACP Portal at this link:

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The letter explains the rationale behind the proposal and contains details of the suggested design principles against which the assessment and progression of all airspace change options will be measured.

Should you wish to comment please do so by email. A Response Form is attached here in Word format which you might find useful for your feedback. Comments are welcome in any written form, directly in an email if you prefer. The address at the top of the engagement letter will periodically be monitored for hard copy responses.

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The Change Sponsor has selected a 4 week duration for stakeholders to submit feedback at Stage 1. Therefore, stakeholders are requested to return any feedback by Tuesday 30 January 2024.

Email responses should be sent to:

The Airspace Change Manager at UASCDC-ACP@qinetiq.com

Responses regarding the proposed airspace change must be received by Tuesday 30 January 2024

Defence UAS Capability Development Centre



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Archived: 06 February 2024 23:29:15

From:

Bcc:

Subject: UC Reminder: UC ACP-2023-022 Engagement Letter - Stage 1

Importance: Normal

Sensitivity: None

Attachments:

[ACP-2023-022 Engagement Response Form - Stage 1.docx](#);

Dear sir or madam,

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Kind regards.

Defence UAS Capability Development Centre

[Redacted]



P Please consider the environment before printing this email.

From: UASCDC-ACP
Sent: 02 January 2024 17:45
Subject: UC ACP-2023-022 Engagement Letter - Stage 1

Dear sir or madam,

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Archived: 06 February 2024 23:29:21

From

Subject: UC Reminder: UC ACP-2023-022 Engagement Letter - Stage 1

Importance: Normal

Sensitivity: None

Attachments:

[ACP-2023-022 Engagement Response Form - Stage 1.docx](#);

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Defence UAS Capability Development Centre



Please consider the environment before printing this email.

From: UAS CDC-ACP

Sent: 02 January 2024 17:44

Subject: UC ACP-2023-022 Engagement Letter - Stage 1

Dear sir or madam,

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Defence UAS Capability Development Centre



P *Please consider the environment before printing this email.*

Archived: 06 February 2024 23:31:31

From: [REDACTED]

Mail received time: Tue, 30 Jan 2024 10:57:19

Sent: Tue, 30 Jan 2024 10:56:53

To: [UASCDC-ACP](#)

Subject: RE: UC Reminder: UC ACP-2023-022 Engagement Letter - Stage 1

Importance: Normal

Sensitivity: None

Hi,

No further comments / feedback from Norwich Airport.

Regards,

From: UASCDC-ACP <UASCDC-ACP@qinetiq.com>

Sent: Wednesday, January 24, 2024 3:08 PM

Subject: UC Reminder: UC ACP-2023-022 Engagement Letter - Stage 1

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Dear sir or madam,

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Kind regards.

Defence UAS Capability Development Centre

[REDACTED]



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Sent: 02 January 2024 17:45

Subject: UC ACP-2023-022 Engagement Letter - Stage 1

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Archived: 06 February 2024 23:31:37

From: [REDACTED]

Mail received time: Wed, 24 Jan 2024 19:33:27

Sent: Wed, 24 Jan 2024 19:33:11

To: [UASCDC-ACP](#)

Subject: Re: UC Reminder: UC ACP-2023-022 Engagement Letter - Stage 1

Importance: Normal

Sensitivity: None

Attachments:

[image001.jpg](#);

Hello,

No comment at this juncture.

Rgds

[REDACTED]

On Wed, 24 Jan 2024, 15:14 UASCDC-ACP, <UASCDC-ACP@qinetiq.com> wrote:

Dear sir or madam,

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Kind regards.

Defence UAS Capability Development Centre

[REDACTED]



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From: UASCDC-ACP

Sent: 02 January 2024 17:44

Subject: UC ACP-2023-022 Engagement Letter - Stage 1

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Defence UAS Capability Development Centre



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Archived: 06 February 2024 23:31:42

From:

To:

Subject: RE: UC Reminder: UC ACP-2023-022 Engagement Letter - Stage 1

Importance: Normal

Sensitivity: None

█
Thank you for your confirmation, it is much appreciated.

█
Defence UAS Capability Development Centre



P *Please consider the environment before printing this email.*

From: S

Sent: 24 January 2024 15:17

To: UAS CDC-ACP <UAS CDC-ACP@qinetiq.com>

Subject: Re: UC Reminder: UC ACP-2023-022 Engagement Letter - Stage 1

Hello,

At this juncture Shouldham PC doesn't have any feedback or questions thank you.

Rgds

█
Clerk

On Wed, 24 Jan 2024, 15:14 UAS CDC-ACP, <UAS CDC-ACP@qinetiq.com> wrote:

Dear sir or madam,

This is a gentle reminder that feedback is encouraged regarding the suggested Design Principles for the airspace proposed at ACP-2023-022. If you do have any comments, and have not already done so, please send them by return of email by Tuesday 30 January 2024.

Kind regards.

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Archived: 06 February 2024 23:31:48

From:

To:

Subject: RE: UC Reminder: UC ACP-2023-022 Engagement Letter - Stage 1

Importance: Normal

Sensitivity: None

[REDACTED],

Thank you for confirming you have no comments on the Stage 1 Engagement Letter for ACP-2023-022.

We look forward to your continued engagement as the ACP progresses.

Kind regards,

[REDACTED]

Defence UAS Capability Development Centre

[REDACTED]



From:

Sent: 30 January 2024 10:57

To: UAS CDC-ACP <UAS CDC-ACP@qinetiq.com>

Subject: RE: UC Reminder: UC ACP-2023-022 Engagement Letter - Stage 1

Hi,

No further comments / feedback from Norwich Airport.

Regards,

From: UAS CDC-ACP <UAS CDC-ACP@qinetiq.com>

Sent: Wednesday, January 24, 2024 3:08 PM

Subject: UC Reminder: UC ACP-2023-022 Engagement Letter - Stage 1

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The Airspace Change Manager at UAS CDC-ACP@qinetiq.com

Responses regarding the proposed airspace change must be received by Tuesday 30 January 2024

Defence UAS Capability Development Centre



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Archived: 06 February 2024 23:31:57

From: [REDACTED]

Mail received time: Wed, 3 Jan 2024 17:16:13

Sent: Wed, 3 Jan 2024 17:15:55

To: [UASCDC-ACP](#)

Cc: [REDACTED]

Subject: Re: UC ACP-2023-022 Engagement Letter - Stage 1

Importance: Normal

Sensitivity: None

Attachments:

[image001.jpg](#);

Dear ACM,

Thank you for bringing this to our attention. As a local drone service provider conducting both VLOS and BVLOS operations in the local area, we fully support your application.

I look forward to hearing more about the progress of this project.

Thanks,

[REDACTED]

[REDACTED]

Director

[REDACTED]

Book some time for a chat with me [REDACTED]

On Tue, 2 Jan 2024 at 17:46, UASCDC-ACP <UASCDC-ACP@qinetiq.com> wrote:

Dear sir or madam,

You were identified as a key aviation stakeholder in the Civil Airspace Publication (CAP) 1616 process for ACP-2023-047, which proposes segregated airspace at RAF Marham in the form of a Temporary Danger Area (TDA). Key aviation stakeholders were approached late last year for feedback on the temporary change.

The Change Sponsor is the MOD and is writing to you again with details of the first stage in the proposal of a permanent solution at RAF Marham in the form of a Danger Area (DA), to enable Protector to access RAF Marham as a nominated diversion airfield.

Full details of this proposed airspace change for Protector are included in an engagement letter which has been uploaded today to the CAA ACP Portal at this link:

[ACP-2023-022 Stage 1 Engagement Letter-1.0](#) (scroll down the page to Documents for this Proposal)

The letter explains the rationale behind the proposal and contains details of the suggested design principles against which the

assessment and progression of all airspace change options will be measured.

Should you wish to comment please do so by email. A Response Form is attached here in Word format which you might find useful for your feedback. Comments are welcome in any written form, directly in an email if you prefer. The address at the top of the engagement letter will periodically be monitored for hard copy responses.

This airspace change is being managed under the ACP process as outlined in CAP1616. Please note that the CAA has issued version 5 of CAP1616, which has been published and implemented on Tuesday 2nd January 2024. However, since preparations for Stage 1 of this ACP were underway prior to the review, the CAA agreed that the Change Sponsor should continue in accordance with the version 4 of CAP1616 for this stage only. All further stages of the ACP will follow the revised process.

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Archived: 06 February 2024 23:32:04

From: [REDACTED]

Mail received time: Thu, 25 Jan 2024 09:26:53

Sent: Thu, 25 Jan 2024 09:25:31

To: [UASCDC-ACP](#)

Subject: RE: UC ACP-2023-022 Engagement Letter - Stage 1

Importance: Normal

Sensitivity: None

Attachments:

[ACP-2023-022 Engagement Response Form-MOD.docx](#);

Hi [REDACTED],

PSA completed stage 1 engagement form, for ACP-2023-022.

Best regards,

[REDACTED]

[REDACTED] | SO2 Airspace Plans | Defence Airspace and Air Traffic Management | Aviation House
11E Beehive Ringroad Crawley West Sussex RH16 0YR | Mobile Telephone: + [REDACTED] | Skype: [REDACTED]
[REDACTED] | E-Mail: [REDACTED]

Upcoming out of office dates: 31 Jan; 12-14 Feb; 4-8 Mar; 29 Mar-1 Apr.

From: UASCDC-ACP <UASCDC-ACP@qinetiq.com>

Sent: 02 January 2024 17:46

Subject: UC ACP-2023-022 Engagement Letter - Stage 1

Dear NATMAC member,

You are a key stakeholder in the Civil Airspace Publication (CAP) 1616 process for ACP-2023-047, which proposes segregated airspace at RAF Marham in the form of a Temporary Danger Area (TDA). Key aviation stakeholders were approached late last year for feedback on the temporary change.

The Change Sponsor is the MOD and is writing to you again with details of the first stage in the proposal of a permanent solution at RAF Marham in the form of a Danger Area (DA), to enable Protector to access RAF Marham as a nominated diversion airfield.

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The letter explains the rationale behind the proposal and contains details of the suggested design principles against which the assessment and progression of all airspace change options will be measured.

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ACP-2023-022 Response Form – Stage 1

Name	[REDACTED]
Representing	MOD (DAATM)
Address (including postcode if possible)	Aviation House 1E Beehive Ringroad Crawley West Sussex RH6 0YR
Feedback: MOD consider the draft design principles to be appropriate for the airspace change proposal. There are no amendments or additions suggested by MOD, and the order of priorities is considered to be correct.	

Archived: 06 February 2024 23:43:40

From:

To: [REDACTED]

Subject: RE: UC Feedback for ACP-2023-022

Importance: Normal

Sensitivity: None

Mr [REDACTED],

Thank you for your feedback on the Stage 1 Engagement Letter for ACP-2023-022.

Your comments are out of scope in terms of feedback on the proposed Design Principles for this ACP. However, your interest has been recorded and we look forward to your continued engagement as the ACP progresses.

Kind regards,

[REDACTED]

Defence UAS Capability Development Centre

[REDACTED]



From: [REDACTED]

Sent: 29 January 2024 11:52

To: UAS CDC-ACP <UAS CDC-ACP@qinetiq.com>

Subject: Feedback for ACP-2023-022

Dear Sir or Madam

You've requested feedback on the above ACP.

My feedback is the same as I presented for the TDA which is trialling it, and I attach a copy. I acknowledge that you replied to my initial comments.

With thanks

[REDACTED]

--

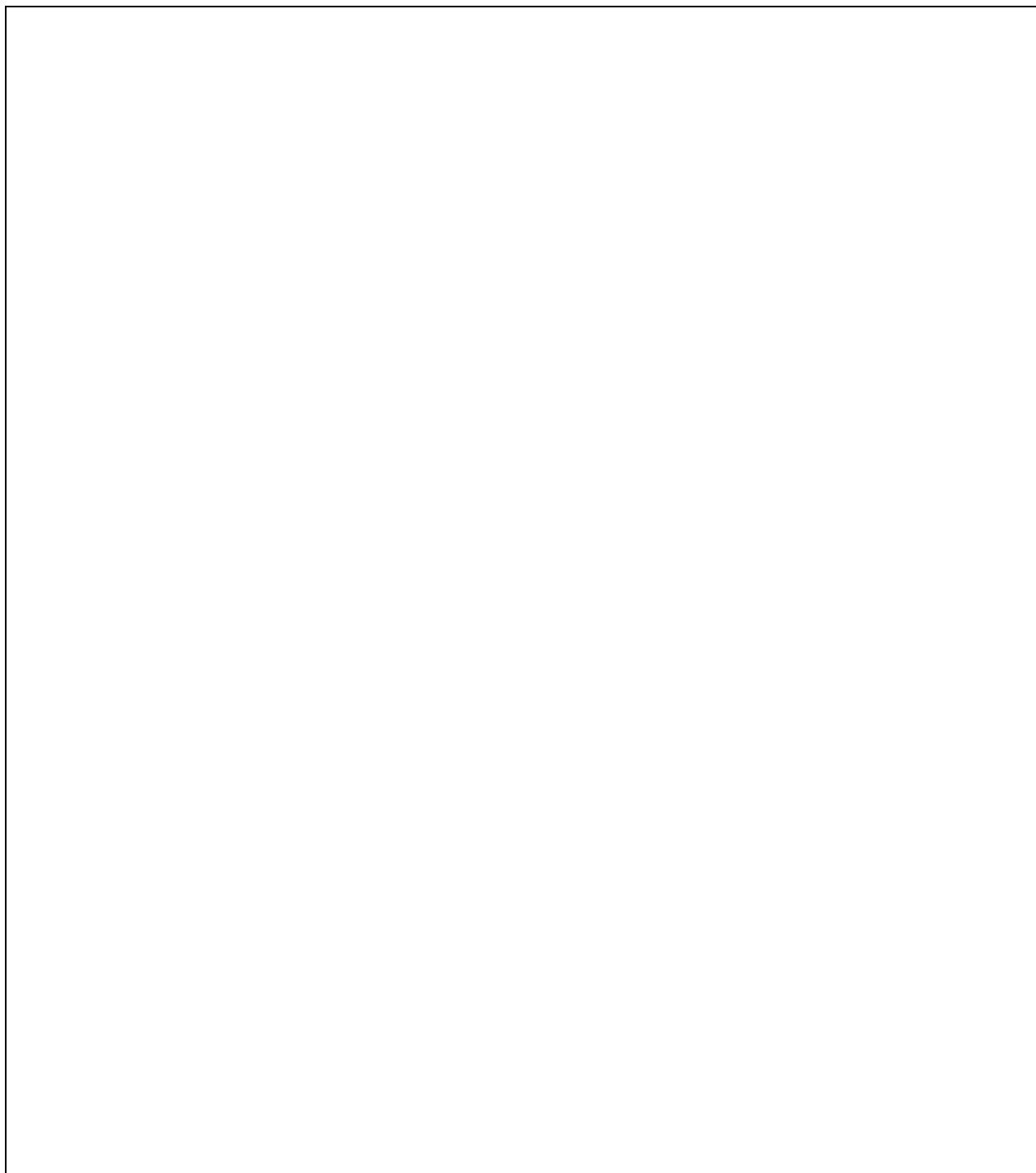
[REDACTED]

[REDACTED]

[REDACTED]

ACP-2023-022 Response

Name	[REDACTED]
Representing	Cambridge Gliding Centre
Address (including postcode if possible)	Gransden Lodge Airfield Longstowe Rd Little Gransden Bedfordshire SG19 3EB
<p>Feedback:</p> <p>East Anglia is an important area for gliding, which has many airspace restrictions of various sorts. If this proposal is to go ahead, it is our view that it must be done in a way which minimises the impact on other airspace users such as glider pilots.</p> <p>From the description given, that should be possible. If it is the case that the TDA will only be used (as opposed to NOTAMed as active) when Waddington becomes unavailable (apart from the two test occasions mentioned) then it should be available for other users at all other times.</p> <p>For that to happen:</p> <ul style="list-style-type: none">• The DACS from Marham ATC must be available at all times that the TDA is NOTAMed as active.• It must be clear that a request for entry will be granted unless the TDA is, or is about to be, actually used as a diversion for the Protector (not that it might be, <i>if</i> Waddington were to become unavailable). If it were the case that Waddington became unavailable, it shouldn't take long for any aircraft within the TDA to clear it. The statement in the consultation that "Therefore, even if the airspace has been notified as being active, it <i>may</i> be possible for both civil and military aircraft to transit through it under a clearance from Marham ATC" (my italics), is disappointingly weak.• Note that relatively few gliders are transponder equipped, and thus the carriage of a transponder shouldn't determine whether a crossing clearance should be granted.• The TDA shouldn't be used by Marham as a way of keeping aircraft out of their MATZ and the airspace above. <p>Clarity on these issues when this TDA is set up would be helpful in informing us of our reaction to the next consultation mentioned.</p>	



Archived: 06 February 2024 23:43:44

From:

To: [REDACTED]

Subject: RE: UC FW: UC FW: UC ACP-2023-022 Engagement Letter - Stage 1

Importance: Normal

Sensitivity: None

[REDACTED],

Thank you for bringing the omission of Shouldham PC to our attention. Please also accept my apologies for the delay in responding to your original question.

As the Airspace Change Proposal (ACP) progresses, there will be further more in-depth engagement describing and discussing the anticipated airspace design, its utilisation and any implications for the local community. This will include a 12 week consultation period later this year which may include a drop-in event and/or targeted meetings, as well as a 'frequently asked questions' page on the CAA portal which will be updated as new queries arise. The consultation will be presented in a non-technical manner, to be readily understood by non-aviators and will ensure opportunity for the public and other interested parties to become familiar with all aspects of the proposal, and enable them to pose any questions, concerns and suggestions. In the interim, I can provide a brief precis of the purpose of the airspace:

The airspace will be activated whenever Protector is airborne and operating from RAF Waddington to offer a standby runway if needed; activation is likely to be during core flying hours Monday – Friday. Some night activation is expected. The MOD intends to minimise the impact on local airspace users and in terms of impact to the local community, this will be assessed as part of the ACP process; but it is expected the aircraft will utilise RAF Marham extremely infrequently.

I can also confirm that Local airspace users have been contacted directly regarding this ACP and invited to contribute to the process.

I hope this provides the initial information you require, but should you have any specific queries, please let me know.

Kind regards,

[REDACTED]

Defence UAS Capability Development Centre

[REDACTED]



From: [REDACTED]

Sent: 08 January 2024 12:38

To: UAS CDC-ACP <UAS CDC-ACP@qinetiq.com>

Subject: RE: UC FW: UC FW: UC ACP-2023-022 Engagement Letter - Stage 1

Dear [REDACTED],

Thank you, an extension should not be necessary but could you answer the other questions I raised please?

Is there a simple explanation for Cllrs and the public of what the changes are and the 'So what' for the locality?

It is assumed that any airspace users in the local community will be informed by a more directly focused approach? Ie Boughton has private airfield.

Rgds

[REDACTED]

[REDACTED]

Clerk & RFO

Boughton Parish Council

From: UASCDC-ACP <UASCDC-ACP@qinetiq.com>

Sent: Monday, January 8, 2024 12:07 PM

To: [REDACTED]

Cc: [REDACTED]

Subject: UC FW: UC FW: UC ACP-2023-022 Engagement Letter - Stage 1

Dear Sir/Madam,

I have been made aware that you are also be a key stakeholder in the Civil Airspace Publication (CAP) 1616 process for ACP-2023-022. Please find below details of this proposal and how you can contribute and provide feedback. Please advise if you require an extension of 6 days to the deadline within which to submit a response.

[REDACTED]

Defence UAS Capability Development Centre

[REDACTED]

The logo for UASCDC (UAS Capability Development Centre) features the text "UASCDC" in a bold, white, sans-serif font, centered within a dark blue rectangular background.

From: UASCDC-ACP

Sent: 02 January 2024 17:45

Subject: UC ACP-2023-022 Engagement Letter - Stage 1

Dear sir or madam,

You were identified as a key aviation stakeholder in the Civil Airspace Publication (CAP) 1616 process for ACP-2023-047, which proposes segregated airspace at RAF Marham in the form of a Temporary Danger Area (TDA). Key aviation stakeholders were approached late last year for feedback on the temporary change.

The Change Sponsor is the MOD and is writing to you again with details of the first stage in the proposal of a permanent solution at RAF Marham in the form of a Danger Area (DA), to enable Protector to access RAF Marham as a nominated diversion airfield.

Full details of this proposed airspace change for Protector are included in an engagement letter which has been uploaded today to the CAA ACP Portal at this link:

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The letter explains the rationale behind the proposal and contains details of the suggested design principles against which the assessment and progression of all airspace change options will be measured.

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Responses regarding the proposed airspace change must be received by Tuesday 30 January 2024

Defence UAS Capability Development Centre



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Archived: 06 February 2024 23:43:51

From:

To: [REDACTED]

Subject: RE: UC Marham Danger Area proposal

Importance: Normal

Sensitivity: None

[REDACTED],

Thank you for your response the Sage 1 Engagement Letter for ACP-2023-022.

At this stage of the ACP, feedback is invited on the design principles, as laid out in the engagement letter. The letter explains that iaw CAP1616, the design principles will be used to inform the assessment and progression of any airspace change options. The process also ensures changes are not arbitrarily applied without full engagement and formal consultation with stakeholders.

As the ACP progresses, and during the Temporary Danger Area (TDA) trial period, there will be further opportunities for contribution to identify whether extant procedures/LOA for Broughton North require amendment to ensure the airstrip users can continue to operate with minimal disruption. It is envisaged that a Danger Area Crossing Service (DACCS) will be available during all periods of the DA activation and for the most part there should be no difference to how access through Marham's overhead is currently managed; crossing requests are likely to be approved along the same lines as a MATZ penetration / overhead routing, pending routine activity at RAF Marham.

In reference to your query regarding use of ATC to maintain separation between light aircraft and unmanned air vehicles, the Regulatory Requirement paragraph of the Engagement Letter provides explanation: Military Aviation Authority (MAA) regulation mandates that as Protector is equipped with a limited Detect And Avoid (DAA) capability, flight in segregated or controlled airspace is required. Since RAF Marham is located entirely within Class G airspace, a form of segregated airspace must be implemented.

I hope this response alleviates any initial concerns, but please continue to engage throughout the process with any suggestions or queries. If you would like to discuss the proposed airspace change in person, please do come along to the East Anglia Airspace Users Working Group (EAAUWG) at RAF Marham on 16 Jan 2024, when there will be an update on both the TDA and DA proposals.

Feedback on the design principles proposed within the engagement letter are encouraged to be submitted by 30 January 2024.

[REDACTED]

[REDACTED]

Email1: [REDACTED]

Email2: [REDACTED]

www.QinetiQ.com | [Our blog](#) | [LinkedIn](#) | [Twitter](#)

From: [REDACTED]

Sent: 03 January 2024 15:51

To: UASDCD-ACP <UASDCD-ACP@qinetiq.com>

Subject: Marham Danger Area proposal

Sir

My private airstrip would appear to fall just within this zone.

What will be the procedure for flights to and from my strip? At the moment all movements are required to contact Marham ATC, as in any MATZ. The purpose of a Danger Area can only be to restrict further any movements within it, or may be even to exclude them altogether. Clearly any restriction cannot be covered by Notam, as Marham is to be just a diversion airfield, which could crop up at any time.

I fail to see why ATC cannot keep light planes away from a drone, when it is quite able to do it with fast jets



Archived: 06 February 2024 23:43:58

From: [REDACTED]

Mail received time: Mon, 29 Jan 2024 11:53:57

Sent: Mon, 29 Jan 2024 11:52:20

To: [UASCDC-ACP](#)

Subject: Feedback for ACP-2023-022

Importance: Normal

Sensitivity: None

Attachments:

[ACP-2023-022 Engagement Response.docx](#);

Dear Sir or Madam

You've requested feedback on the above ACP.

My feedback is the same as I presented for the TDA which is trialling it, and I attach a copy. I acknowledge that you replied to my initial comments.

With thanks

[REDACTED]

--

[REDACTED]

Archived: 06 February 2024 23:44:01

From:

To: [REDACTED]

Subject: RE: UC ACP-2023-022 Engagement Letter - Stage 1

Importance: Normal

Sensitivity: None

[REDACTED]

Thank you for your response the Stage 1 Engagement Letter for ACP-2023-022.

EAAA were also contacted directly as part of this engagement, as well as during the TDA engagement. During the TDA engagement, a representative from Babcock International similarly suggested contact details are made available to ensure Cat A flights are unaffected by the segregated airspace; this has been taken into account and a request was made for the NOTAM originator to include Marham ATC contact numbers. ATC procedures are also anticipated for emergency aircraft to access the TDA. If effective, these will be maintained for the management of the DA.

We will keep you apprised of the progression of this ACP and welcome your continued feedback throughout.

[REDACTED]

Defence UAS Capability Development Centre

[REDACTED]



From: [REDACTED]

Sent: 03 January 2024 11:00

To: UAS CDC-ACP <UAS CDC-ACP@qinetiq.com>

Cc: [REDACTED]

Subject: FW: UC ACP-2023-022 Engagement Letter - Stage 1

The BHA wishes to be involved in the ACP consultation process to keep its members informed. I have copied in EAAA as they are one of the major users of the airspace in the Marham area. We would hope to see in your proposal either a frequency or a telephone number which allow emergency service helicopters to coordinate access to the TDA should an incident warrant it.

Yours

[REDACTED]

[REDACTED]

Chief Executive

British Helicopter Association

Unit C2

Fairoaks Airport

Chobham

Surrey. GU24 8HU

[REDACTED]

[REDACTED]

www.britishhelicopterassociation.org

From: UASCDC-ACP <UASCDC-ACP@qinetiq.com>

Sent: Tuesday, January 2, 2024 5:46 PM

Subject: UC ACP-2023-022 Engagement Letter - Stage 1

Dear NATMAC member,

You are a key stakeholder in the Civil Airspace Publication (CAP) 1616 process for ACP-2023-047, which proposes segregated airspace at RAF Marham in the form of a Temporary Danger Area (TDA). Key aviation stakeholders were approached late last year for feedback on the temporary change.

The Change Sponsor is the MOD and is writing to you again with details of the first stage in the proposal of a permanent solution at RAF Marham in the form of a Danger Area (DA), to enable Protector to access RAF Marham as a nominated diversion airfield.

Full details of this proposed airspace change for Protector are included in an engagement letter which has been uploaded today to the CAA ACP Portal at this link:

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Responses regarding the proposed airspace change must be received by Tuesday 30 January 2024



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Archived: 06 February 2024 23:44:07

From: [REDACTED]

Mail received time: Mon, 8 Jan 2024 11:49:11

Sent: Mon, 8 Jan 2024 11:49:07

To: [UASCDC-ACP](#)

Subject: RE: UC ACP-2023-022 Engagement Letter - Stage 1

Importance: Normal

Sensitivity: None

Dear Sir or madam,

I am also Clerk for Shouldham Parish Council which is within the 20 mile radius of RAF Marham but have not received this correspondence from you? If we should be informed and asked for feedback then please write to shouldhampc@gmail.com they have a meeting on 15th Jan and the agenda is to be published on 9th Jan so you have a brief window to engage to receive a response before the 30 Jan as your letter indicates.

In addition is there a simple explanation for Cllrs and the public of what the changes are and the 'So what' for the locality? It is assumed that any airspace users in the local community will be informed by a more directly focused approach? Ie Boughton has private airfield.

Rgds

[REDACTED]

[REDACTED]

Clerk & RFO

Boughton Parish Council

From: UASCDC-ACP <UASCDC-ACP@qinetiq.com>

Sent: Tuesday, January 2, 2024 5:44 PM

Subject: UC ACP-2023-022 Engagement Letter - Stage 1

Dear sir or madam,

You have been identified as a key stakeholder in the Civil Airspace Publication (CAP) 1616 process for a permanent airspace change which is being sponsored by the Ministry of Defence in the vicinity of RAF Marham. This change under the identification number ACP-2023-022 proposes to establish a volume of airspace centred on RAF Marham which will enable a large Remotely Piloted Air System (RPAS), Protector RG Mk1, to access RAF Marham as a diversion airfield in the event that, for any unforeseen reason, RAF Waddington becomes unavailable.

Full details of this proposed airspace change for Protector are included in an engagement letter which has been uploaded today to the CAA ACP Portal at this link:

[ACP-2023-022 Stage 1 Engagement Letter-1.0](#) (scroll down the page to Documents for this Proposal)

The letter explains the rationale behind the proposal and contains details of the suggested design principles against which the assessment and progression of all airspace change options will be measured.

Should you wish to comment please do so by email. A Response Form is attached here in Word format which you might find useful for your feedback. Comments are welcome in any written form, directly in an email if you prefer. The address at the top of the engagement letter will periodically be monitored for hard copy responses.

This airspace change is being managed under the ACP process as outlined in CAP1616. Please note that the CAA has issued version 5 of CAP1616, which has been published and implemented on Tuesday 2nd January 2024. However, since preparations for Stage 1 of this ACP were underway prior to the review, the CAA agreed that the Change Sponsor should continue in accordance with the version 4 of CAP1616 for this stage only. All further stages of the ACP will follow the revised process.

The Change Sponsor has selected a 4 week duration for stakeholders to submit feedback at Stage 1. Therefore, stakeholders are requested to return any feedback by Tuesday 30 January 2024.

Email responses should be sent to:

The Airspace Change Manager at UASCDC-ACP@qinetiq.com

Responses regarding the proposed airspace change must be received by Tuesday 30 January 2024

Defence UAS Capability Development Centre



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Archived: 06 February 2024 23:44:13

From:

To: [REDACTED]

Cc: [REDACTED]

Subject: RE: UC ACP-2023-022 Engagement Letter - Stage 1

Importance: Normal

Sensitivity: None

[REDACTED]

Thank you for making us aware of the additional stakeholder; I have forwarded the Engagement Letter to [REDACTED]

The feedback you submitted on a separate email has been received and a response will be sent imminently.

Kind regards,

[REDACTED]

[REDACTED]

Email1: [REDACTED]

Email2: [REDACTED]

www.QinetiQ.com | [Our blog](#) | [LinkedIn](#) | [Twitter](#)

From: [REDACTED]

Sent: 03 January 2024 15:56

To: UASCDC-ACP <UASCDC-ACP@qinetiq.com>

Subject: Re: UC ACP-2023-022 Engagement Letter - Stage 1

Sir or Madam

I have replied to this worrying message

A friend of mine also has an airstrip in Boughton, and he knows nothing of this

His email is [REDACTED]

Thanks

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

From: "UASCDC-ACP" <UASCDC-ACP@qinetiq.com>

To:

Sent: Tuesday, 2 Jan, 24 At 17:45

Subject: UC ACP-2023-022 Engagement Letter - Stage 1

Dear sir or madam,

You were identified as a key aviation stakeholder in the Civil Airspace Publication (CAP) 1616 process for ACP-2023-047, which proposes segregated airspace at RAF Marham in the form of a Temporary Danger Area (TDA). Key aviation stakeholders were approached late last year for feedback on the temporary change.

The Change Sponsor is the MOD and is writing to you again with details of the first stage in the proposal of a permanent solution at RAF Marham in the form of a Danger Area (DA), to enable Protector to access RAF Marham as a nominated diversion airfield.

Full details of this proposed airspace change for Protector are included in an engagement letter which has been uploaded today to the CAA ACP Portal at this link:

[ACP-2023-022 Stage 1 Engagement Letter-1.0](#) (scroll down the page to Documents for this Proposal)

The letter explains the rationale behind the proposal and contains details of the suggested design principles against which the assessment and progression of all airspace change options will be measured.

Should you wish to comment please do so by email. A Response Form is attached here in Word format which you might find useful for your feedback. Comments are welcome in any written form, directly in an email if you prefer. The address at the top of the engagement letter will periodically be monitored for hard copy responses.

This airspace change is being managed under the ACP process as outlined in CAP1616. Please note that the CAA has issued version 5 of CAP1616, which has been published and implemented on Tuesday 2nd January 2024. However, since preparations for Stage 1 of this ACP were underway prior to the review, the CAA agreed that the Change Sponsor should continue in accordance with the version 4 of CAP1616 for this stage only. All further stages of the ACP will follow the revised process.

The Change Sponsor has selected a 4 week duration for stakeholders to submit feedback at Stage 1. Therefore, stakeholders are requested to return any feedback by Tuesday 30 January 2024.

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Defence UAS Capability Development Centre



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the content of email for the purposes of security. QinetiQ Limited (Registered in England & Wales: Company Number: 3796233) Registered office: Cody Technology Park, Ively Road, Farnborough, Hampshire, GU14 0LX <https://www.qinetiq.com>



Archived: 06 February 2024 23:44:18

From:

To: [REDACTED]

Subject: RE: UC ACP-2023-022 Engagement Letter - Stage 1

Importance: Normal

Sensitivity: None

[REDACTED]

Thank you for your response to the Stage 1 Engagement Letter for ACP-2023-022.

To ensure transparency, the TDA engagement letter did explain that the TDA is a trial for permanent airspace. Also, the engagement letter for ACP-2023-022 does confirm this proposal is for the permanent solution.

Please be reassured that the expectation is for the permanent Danger Area (DA) to be managed in the same way as the Temporary Danger Area (TDA). Specifically, it will only be activated when Protector is operating, and procedures for access to/from East Winch will continue in accordance with the Letter of Agreement (LOA) between RAF Marham and East Winch (to be updated with new signatory). The TDA trial will provide opportunity to identify whether the LOA requires any amendment to ensure East Winch airfield users can operate with minimal disruption. Local airspace users should only be inconvenienced in the event of an actual diversion, which will be very infrequent.

I hope this response alleviates any initial concerns, but please continue to engage throughout the process with any suggestions or queries. If you would like to discuss the proposed airspace change in person, please do come along to the East Anglia Airspace Users Working Group (EAAUWG) at RAF Marham on 16 Jan 2024, when there will be an update on both the TDA and DA proposals.

Feedback on the design principles proposed within the engagement letter are encouraged to be submitted by 30 January 2024

Kind regards,

[REDACTED]

Defence UAS Capability Development Centre

[REDACTED]



From: [REDACTED]

Sent: 03 January 2024 14:30

To: UAS CDC-ACP <UAS CDC-ACP@qinetiq.com>

Subject: Fwd: UC ACP-2023-022 Engagement Letter - Stage 1

Thank you for the update email, however can you confirm the changes.

In the original proposal, RAF Marham requested a Temporary Danger Area to be activate whilst the drone is in operation, however the latest email would suggest a Permanent Danger Area, is this correct?

In a reply to your previous email, I was assured that RAF Marham would facilitate movements in and out of East Winch Airfield as part of the Temporary Danger Area proposal, has this changed with the request of a Permanent Danger Area?

If so, I wish to object to their proposal as you cannot prevent movements at East Winch Airfield.

[REDACTED]

[REDACTED]

[REDACTED]

Begin forwarded message:

From: UASCDC-ACP <UASCDC-ACP@qinetiq.com>
Date: 2 January 2024 at 14:45:31 GMT-3
Subject: UC ACP-2023-022 Engagement Letter - Stage 1

Dear sir or madam,

You were identified as a key aviation stakeholder in the Civil Airspace Publication (CAP) 1616 process for ACP-2023-047, which proposes segregated airspace at RAF Marham in the form of a Temporary Danger Area (TDA). Key aviation stakeholders were approached late last year for feedback on the temporary change.

The Change Sponsor is the MOD and is writing to you again with details of the first stage in the proposal of a permanent solution at RAF Marham in the form of a Danger Area (DA), to enable Protector to access RAF Marham as a nominated diversion airfield.

Full details of this proposed airspace change for Protector are included in an engagement letter which has been uploaded today to the CAA ACP Portal at this link:

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The letter explains the rationale behind the proposal and contains details of the suggested design principles against which the assessment and progression of all airspace change options will be measured.

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This airspace change is being managed under the ACP process as outlined in CAP1616. Please note that the CAA has issued version 5 of CAP1616, which has been published and implemented on Tuesday 2nd January 2024. However, since preparations for Stage 1 of this ACP were underway prior to the review, the CAA agreed that the Change Sponsor should continue in accordance with the version 4 of CAP1616 for this stage only. All further stages of the ACP will follow the revised process.

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Archived: 06 February 2024 23:51:25

From:

To: [Redacted]
Cc: [Redacted]

Subject: RE: UC ACP-2023-022 - Stage 1:Final DPs

Importance: Normal

Sensitivity: None

[Redacted]

You may have noted a minor error within the email below, whereby rationale for selected DPs 3 and 4 were the wrong way round.

Corrected table below:

DP#	Initial Cat	Initially Proposed DP	Revised DP	Rationale for Selected DP	Selected Cat
DP1	Safety	The airspace change proposal must maintain a high standard of safety and should seek to enhance current levels of safety.	The airspace change proposal must maintain a high standard of safety and should seek to enhance levels of safety, wherever possible.	This DP was taken from CAP 1616 V5 Rather than delete 'should seek to enhance levels of safety', the Change Sponsor has inserted qualifying text 'wherever possible'. This is to acknowledge that safety remains the MOD top priority, however, this ACP is not seeking to enhance current levels.	Safety
DP2	Technical (MOD requirements)	The airspace provides access to a sufficient area to meet operational and training objectives.		N/A: No revision proposed.	Technical (MOD requirements)
DP3	Technical (Accessibility for airspace users)	The airspace change proposal should consider the requirements of other airspace users by maximising accessibility to other airspace users.	The airspace design should endeavour to maximise accessibility for other airspace users.	Simplified text.	Technical (Accessibility for airspace users)
DP4	Environment (Other aviation stakeholders)	The airspace change proposal should consider the impacts on air navigation service providers and other aviation stakeholders such as nearby airport operators.	The airspace change proposal should consider the impacts on all airspace users.	Switched to Technical category. Following feedback, amended to 'all airspace users' to encompass a broader range of stakeholders.	Technical (Impact for airspace users)
DP5	Policy	The airspace change proposal should not be inconsistent with relevant legislation, the CAA's airspace modernisation strategy or Secretary of State and CAA's policy and guidance.		N/A: No revision proposed.	Policy

Please accept my apologies for any confusion caused.

[Redacted]

Defence UAS Capability Development Centre

Email: [Redacted]



From: UAS CDC-ACP

Sent: 02 February 2024 17:47

To: [Redacted]

Cc: [REDACTED]

Subject: UC ACP-2023-022 - Stage 1:Final DPs

[REDACTED]

Thank you for your feedback regarding the Design Principles regarding ACP-2023-022. In response to some of your specific comments, the following information is provided for clarification:

The proposed airspace is a permanent solution. However, it will activated only when required (during Protector activity) and will be notified as active via NOTAM.

As a Danger Area, it will remain Class G airspace, but will revert to unsegregated Class G when not activated.

During Stages 2 – 4 of the ACP process, in accordance with guidance laid out in CAP1616f, the MOD will complete an environmental assessment. As you may be aware the MOD is only required to assess the consequential impact on civil airspace users and not of the military activity itself.

is important that the size and area of the airspace facilitates safe operation of Protector, particularly when in critical stages of flight. This is true for whether the airfield is the main operating base, or the diversion.

Please see below table that describes the proposed changes to the Design Principles taking into account your comments, and those of other stakeholders who sent feedback.

DP#	Initial Cat	Initially Proposed DP	Revised DP	Rationale for Selected DP	Selected Cat
DP1	Safety	The airspace change proposal must maintain a high standard of safety and should seek to enhance current levels of safety	The airspace change proposal must maintain a high standard of safety and should seek to enhance levels of safety, wherever possible.	This DP was taken from CAP 1616 V5 Rather than delete 'should seek to enhance levels of safety', the Change Sponsor has inserted qualifying text 'wherever possible'. This is to acknowledge that safety remains the MOD top priority, however, this ACP is not seeking to enhance current levels.	Safety
DP2	Technical (MOD requirements)	The airspace provides access to a sufficient area to meet operational and training objectives.		Simplified text.	Technical (MOD requirements)
DP3	Technical (Accessibility for airspace users)	The airspace change proposal should consider the requirements of other airspace users by maximising accessibility to other airspace users.	The airspace design should endeavour to maximise accessibility for other airspace users	N/A: No revision proposed.	Technical (Accessibility for airspace users)
DP4	Environment (Other aviation stakeholders)	The airspace change proposal should consider the impacts on air navigation service providers and other aviation stakeholders such as nearby airport operators.	The airspace change proposal should consider the impacts on all airspace users.	Following feedback, amended to 'all airspace users' to encompass a broader range of stakeholders.	Technical (Impact for airspace users)
DP5	Policy	The airspace change proposal should not be inconsistent with relevant legislation, the CAA's airspace modernisation strategy or Secretary of State and CAA's policy and guidance.		N/A: No revision proposed	Policy

Prioritisation:

Safety is the highest priority and so DP1 is automatically assigned Priority 1

After consideration, the Change Sponsor elected to retain DP2 as a higher priority than DP3 and DP4 due to the necessity of airspace suitable in size and shape to enable Protector to complete its training and operational objectives.

Since there was no feedback from local airspace users distinguishing the order of priority between DP3 and DP 4, thus the prioritisation of these DPs was altered and both were allocated same priority.

One stakeholder noted the text for DP 5 is the same as MDP3 on p20 of CAP1616F and implied it should have the same priority as DP1 and implied it should have the same priority as DP1. In allocating priorities the Change Sponsor believes that DP 1 and DP 2 remain their highest priorities. That said, in acknowledging Stakeholder comments, the Change Sponsor had elevated DP5 above DP 3 and DP4.

Priority	Ref	Design Principle
1	DP1	The airspace change proposal must maintain a high standard of safety and should seek to enhance levels of safety, wherever possible.

2	DP2	The airspace provides access to a sufficient area to meet operational and training objectives.
3	DP5	The airspace change proposal should not be inconsistent with relevant legislation, the CAA's airspace modernisation strategy or Secretary of State and CAA's policy and guidance.
4	DP3	The airspace design should endeavour to maximise accessibility for other airspace users.
	DP4	The airspace change proposal should consider the impacts on all airspace users.

Thank you for your continued engagement with this ACP process; it would be appreciated if you are able to return with either consent or any further comments regarding the Design Principles by 6 February. A prompt response will enable us to submit the Design Principles to the CAA for regulatory assessment.

Kind regards,

Defence UAS Capability Development Centre



From: [Redacted]

Sent: 29 January 2024 14:57

To: UASCDC-ACP <UASCDC-ACP@qinetiq.com>

Cc: [Redacted]

Subject: ACP-2023-022

The Light Aircraft Association **object** to the above ACP and provide the following comment on the above ACP:-

The need for a permanent airspace solution, rather than activation by NOTAM when required, for what is a diversion facility and thus not in regular use, is not clear and appears to go against DP1 and DP3.

It is the LAA position that CAS should be minimised and revert to Class G when not in use.

Surveillance and upgrade of the onboard "limited DAA" facility onboard would of course be preferred to the imposition of CAS to allow integrated operation in Class G.

There is no DP that relates to the Environment ?

DP2, as it relates to a diversion facility would appear to warrant a lower priority than DP3 and DP4



Light Aircraft Association

Archived: 06 February 2024 23:51:32

From: [REDACTED]

Mail received time: Thu, 25 Jan 2024 21:16:59

Sent: Thu, 25 Jan 2024 21:16:49

To: [UASCDC-ACP](#)

Subject: RE: UC FW: UC ACP-2023-022 Engagement Letter - Stage 1

Importance: Normal

Sensitivity: None

[REDACTED]

Noted thanks.

Kind regards

[REDACTED]

From: [REDACTED]

Sent: Thursday, January 25, 2024 7:33 PM

To: [REDACTED]

Subject: UC FW: UC ACP-2023-022 Engagement Letter - Stage 1

[REDACTED]

Further to the email below, and after some more deliberation, it is proposed the wording of the Design will be adjusted as follows:

DP number	Initial Proposed DP	Suggested DP	Revised DP	Rationale
DP1	The airspace change proposal must maintain a high standard of safety and should seek to enhance current levels of safety.	The airspace change proposal must maintain current levels of safety and should seek to enhance levels of safety wherever possible.	The airspace change proposal must maintain a high standard of safety and should seek to enhance levels of safety wherever possible .	It may not be possible for the Change Sponsor to measure current levels of safety to use as evidence to support that the airspace design(s) will maintain or enhance safety levels. A high standard of safety through design is a more viable basis for meeting the Statement of Need.
DP2	The airspace provides access to a sufficient area to meet operational and training objectives.	No change.	No change from initial proposed DP.	N/A
DP3	The airspace change proposal should consider the	The airspace change proposal should address the requirements of other	No change from initial proposed DP.	It may not be possible to address requirements of airspace users (particularly as all requirements may not

	requirements of other airspace users by maximising accessibility to other airspace users.	airspace users by maximising accessibility to other airspace users.		yet be known). However, all requirements brought to the attention of the Change Sponsor will be taken into consideration and accommodated wherever possible.
DP4	The airspace change proposal should consider the impacts on air navigation service providers and other aviation stakeholders such as nearby airport operators.	The airspace change proposal should consider the impact on air navigation service providers and other aviation stakeholders such as local airport, airfield, airstrip and air vehicle operators.	As per suggested DP	Airfields, airstrips and air vehicle operators have been specified as these groups are already identified stakeholders through ACP-2023-047.
DP5	The airspace change proposal should not be inconsistent with relevant legislation, the CAA's airspace modernisation strategy or Secretary of State and CAA's policy and guidance.	No change.	No change from initial proposed DP.	N/A

It is hoped the rationale behind the amendments sufficiently explain the selected wording. Should you have any additional comments on the DP, please present them before the Stage 1 deadline of 30 Jan 24. As previously mentioned, your continued feedback throughout the ACP process is welcomed.

Kind regards,



Defence UAS Capability Development Centre



From: UAS CDC-ACP

Sent: 11 January 2024 14:39

To: [Redacted]

Subject: RE: UC ACP-2023-022 Engagement Letter - Stage 1

Good afternoon [Redacted]

Thank you for your response to the Sage 1 Engagement Letter for ACP-2023-022.

Your feedback has been taken into consideration and as a result the Design Principles have been reviewed. Please find below proposed amendment for your comment.

DP number	Initial Proposed DP	Revised DP for Consideration

DP1	The airspace change proposal must maintain a high standard of safety and should seek to enhance current levels of safety.	The airspace change proposal must maintain current levels of safety and should seek to enhance levels of safety wherever possible.
DP2	The airspace provides access to a sufficient area to meet operational and training objectives.	No change (see below ref training objectives).
DP3	The airspace change proposal should consider the requirements of other airspace users by maximising accessibility to other airspace users.	The airspace change proposal should address the requirements of other airspace users by maximising accessibility to other airspace users.
DP4	The airspace change proposal should consider the impacts on air navigation service providers and other aviation stakeholders such as nearby airport operators.	The airspace change proposal should consider the impact on air navigation service providers and other aviation stakeholders such as local airport, airfield, airstrip and air vehicle operators.
DP5	The airspace change proposal should not be inconsistent with relevant legislation, the CAA's airspace modernisation strategy or Secretary of State and CAA's policy and guidance.	No change.

Training objectives noted at DP2 are yet to be quantified, but it is expected that training will be in the form of infrequent sorties to practice the diversion only. Synthetic training will be the preferred method of training and therefore live training will be kept to a minimum.

On the subject of linked airspace changes, I'm afraid the manner in which the MOD submits airspace change proposals is out of scope for Stage 1 engagement. Also, not pertinent at this stage is the equipment configuration and operational requirement of the air vehicle. The trial TDA under ACP-2023-047 is transparent in that the objective is to test the design for a permanent DA, as described within the Introduction of the TDA engagement letter. The CAA is cognisant of the requirement and has approved the route to propose such via an ACP.

Please be assured that all feedback received for this ACP will be submitted to the CAA as evidence of engagement with stakeholders, with redacted copies available on the CAA Portal for public view.

I hope this response addresses your initial feedback, but please continue to engage throughout the process with any suggestions or queries. If you would like to discuss the proposed airspace change in person (or via a representative), there will be an update on both the TDA and DA proposals at the East Anglia Airspace Users Working Group (EAAUWG), at RAF Marham on 16 Jan 2024.

Kind regards,

[Redacted Signature]

Defence UAS Capability Development Centre

[Redacted Address Line]



From: [Redacted]

Sent: 03 January 2024 09:24

To: UAS CDC-ACP [Redacted]

Subject: RE: UC ACP-2023-022 Engagement Letter - Stage 1

[Redacted Footer]

Thanks for your engagement re ACP-2023-022.

We note that this ACP is described as a requirement that will facilitate operation of the recently established permanent danger area at Waddington. We strongly object to the way the MOD has implemented an airspace change and separately, after the event, added another directly operationally linked airspace change. By doing so, the MoD has effectively ensured that the ACP is going to be approved by CAA. In effect, stakeholders are not positioned to challenge it. Had both directly linked ACPs been consulted on together, stakeholders would have been made aware up front of the total impact of the changes being proposed. This is the second MoD ACP application that has used this approach; the temporary and permanent DA ACPs related to the RAFAT relocation were similarly obscured.

Turning to the Design Principles, we note:

DP number	Proposed DP	Comment
DP1	The airspace change proposal must maintain a high standard of safety and should seek to enhance current levels of safety.	The activity that is being imported by the MoD slightly reduces the level of safety. There is no justification for using an ACP to <i>enhance</i> current levels of safety - the ACP must maintain the current standard of safety.
DP2	The airspace provides access to a sufficient area to meet operational and training objectives	The ACP is justified as a contingency diversion requirement. As training will change the utility of the proposed danger area, what training objectives does the MoD have in mind?
DP3	The airspace change proposal should consider the requirements of other airspace users by maximising accessibility to other airspace users	The ACP implies a significant volume of restricted access airspace. The ACP should <i>address</i> the requirements of other airspace users and maximise accessibility by other airspace users.
DP4	The airspace change proposal should consider the impacts on air navigation service providers and other aviation stakeholders such as nearby airport operators	Other aviation stakeholders include operators not based on an airport, for example airfields and strips.
DP5	The airspace change proposal should not be inconsistent with relevant legislation, the CAA's airspace modernisation strategy or Secretary of State and CAA's policy and guidance	No comment.

We are also concerned that the MoD is implementing RPAS operations without enabling the available DAA technology and in doing so is adding yet more complexity and restrictions to the UK's lower airspace.

Please share our response with the CAA.

We look forward to further engagement on this ACP.

Kind regards

██████████
British Gliding Association

From: UAS CDC-ACP ██████████
Sent: Tuesday, January 2, 2024 5:46 PM
Subject: UC ACP-2023-022 Engagement Letter - Stage 1

Dear NATMAC member,

You are a key stakeholder in the Civil Airspace Publication (CAP) 1616 process for ACP-2023-047, which proposes segregated airspace at RAF Marham in the form of a Temporary Danger Area (TDA). Key aviation stakeholders were approached late last year for feedback on the temporary change.

The Change Sponsor is the MOD and is writing to you again with details of the first stage in the proposal of a permanent solution at RAF Marham in the form of a Danger Area (DA), to enable Protector to access RAF Marham as a nominated diversion airfield.

Full details of this proposed airspace change for Protector are included in an engagement letter which has been uploaded today to the CAA ACP Portal at this link:

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The letter explains the rationale behind the proposal and contains details of the suggested design principles against which the assessment and progression of all airspace change options will be measured.

Should you wish to comment please do so by email. A Response Form is attached here in Word format which you might find useful for your feedback. Comments are welcome in any written form, directly in an email if you prefer. The address at the top of the engagement letter will periodically be monitored for hard copy responses.

This airspace change is being managed under the ACP as outlined in CAP1616. Please note that the CAA has issued version 5 of CAP1616, which has been published and implemented on Tuesday 2nd January 2024. However, since preparations for Stage 1 of this ACP were underway prior to the review, the CAA agreed that the Change Sponsor should continue in accordance with the version 4 of CAP1616 for this stage only. All further stages of the ACP will follow the revised process.

The Change Sponsor has selected a 4 week duration for stakeholders to submit feedback at Stage 1. Therefore, stakeholders are requested to return any feedback by Tuesday 30 January 2024.

Email responses should be sent to:

The Airspace Change Manager at ██████████

Responses regarding the proposed airspace change must be received by Tuesday 30 January 2024

Defence UAS Capability Development Centre

██████████ ██████████



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Archived: 06 February 2024 23:51:42

From:

To: [REDACTED]

Subject: RE: UC ACP-2023-022 - Stage 1:Final DPs

Importance: Normal

Sensitivity: None

[REDACTED]

You may have noted a minor error within the email below, whereby rationale for selected DPs 3 and 4 were the wrong way round..

Corrected table below:

DP#	Initial Cat	Initially Proposed DP	Revised DP	Rationale for Selected DP	Selected Cat
DP1	Safety	The airspace change proposal must maintain a high standard of safety and should seek to enhance current levels of safety.	The airspace change proposal must maintain a high standard of safety and should seek to enhance levels of safety, wherever possible.	This DP was taken from CAP 1616 V5 Rather than delete 'should seek to enhance levels of safety', the Change Sponsor has inserted qualifying text 'wherever possible'. This is to acknowledge that safety remains the MOD top priority, however, this ACP is not seeking to enhance current levels.	Safety
DP2	Technical (MOD requirements)	The airspace provides access to a sufficient area to meet operational and training objectives.		N/A: No revision proposed.	Technical (MOD requirements)
DP3	Technical (Accessibility for airspace users)	The airspace change proposal should consider the requirements of other airspace users by maximising accessibility to other airspace users.	The airspace design should endeavour to maximise accessibility for other airspace users.	Simplified text.	Technical (Accessibility for airspace users)
DP4	Environment (Other aviation stakeholders)	The airspace change proposal should consider the impacts on air navigation service providers and other aviation stakeholders such as nearby airport operators.	The airspace change proposal should consider the impacts on all airspace users.	Switched to Technical category. Following feedback, amended to 'all airspace users' to encompass a broader range of stakeholders.	Technical (Impact for airspace users)
DP5	Policy	The airspace change proposal should not be inconsistent with relevant legislation, the CAA's airspace modernisation strategy or Secretary of State and CAA's policy and guidance.		N/A: No revision proposed.	Policy

Please accept my apologies for any confusion caused.

[REDACTED]

Defence UAS Capability Development Centre



From: UAS CDC-ACP

Sent: 02 February 2024 17:47

To: 'COCKCROFT, Michael C' <michael.cockcroft@nats.co.uk>

Subject: UC ACP-2023-022 - Stage 1:Final DPs

Thank you for your feedback regarding the Design Principles regarding ACP-2023-022. Your comprehensive feedback evoked a big discussion and resulted in some amendment to the Design Principles. In response to some of your specific comments, the following information is provided for clarification:

The proposed airspace will only be activated when required – during Protector activity – and will be notified as active via NOTAM. As a Danger Area, it will remain Class G, but will revert to unsegregated Class G when not activated.

An environmental assessment is carried out as part of the Airspace Change process, in accordance with guidance laid out in CAP1616f. As you may be aware the MOD is only required to assess the consequential impact on civil airspace users and not of the military activity itself.

Separate engagement will be offered regarding deployment of Protector into other airspace structures.

Please see below tables that describe the proposed changes to the Design Principles, taking into account your comments, and those of other stakeholders who sent feedback:

DP#	Initial Cat	Initially Proposed DP	Revised DP	Rationale for Selected DP	Selected Cat
DP1	Safety	The airspace change proposal must maintain a high standard of safety and should seek to enhance current levels of safety	The airspace change proposal must maintain a high standard of safety and should seek to enhance levels of safety, wherever possible.	This DP was taken from CAP 1616 V5 Rather than delete 'should seek to enhance levels of safety', the Change Sponsor has inserted qualifying text 'wherever possible'. This is to acknowledge that safety remains the MOD top priority, however, this ACP is not seeking to enhance current levels.	Safety
DP2	Technical (MOD requirements)	The airspace provides access to a sufficient area to meet operational and training objectives.		Simplified text.	Technical (MOD requirements)
DP3	Technical (Accessibility for airspace users)	The airspace change proposal should consider the requirements of other airspace users by maximising accessibility to other airspace users.	The airspace design should endeavour to maximise accessibility for other airspace users	N/A: No revision proposed.	Technical (Accessibility for airspace users)
DP4	Environment (Other aviation stakeholders)	The airspace change proposal should consider the impacts on air navigation service providers and other aviation stakeholders such as nearby airport operators.	The airspace change proposal should consider the impacts on all airspace users.	Following feedback, amended to 'all airspace users' to encompass a broader range of stakeholders.	Technical (Impact for airspace users)
DP5	Policy	The airspace change proposal should not be inconsistent with relevant legislation, the CAA's airspace modernisation strategy or Secretary of State and CAA's policy and guidance.		N/A: No revision proposed	Policy

Prioritisation:

Safety is the highest priority and so DP1 is automatically assigned Priority 1

After consideration, the Change Sponsor elected to retain DP2 as a higher priority than DP3 and DP4 due to the necessity of airspace suitable in size and shape to enable Protector to complete its training and operational objectives.

Since there was no feedback from local airspace users distinguishing the order of priority between DP3 and DP 4, thus the prioritisation of these DPs was altered and both were allocated same priority.

In allocating priorities the Change Sponsor believes that DP 1 and DP 2 remain their highest priorities. That said, in acknowledging your comments, the Change Sponsor had elevated DP5 above DP 3 and DP4.

Priority	Ref	Design Principle
1	DP1	The airspace change proposal must maintain a high standard of safety and should seek to enhance levels of safety, wherever possible.
2	DP2	The airspace provides access to a sufficient area to meet operational and training objectives.
3	DP5	The airspace change proposal should not be inconsistent with relevant legislation, the CAA's airspace modernisation strategy or Secretary of State and CAA's policy and guidance.
4	DP3	The airspace design should endeavour to maximise accessibility for other airspace users.

Thank you for your continued engagement with this ACP process; we'd appreciate if you are able to return with either consent or any further comments regarding the revised Design Principles by 6 February. A prompt response will enable us to submit the Design Principles to the CAA for regulatory assessment.

Kind regards,

Defence UAS Capability Development Centre



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From: [Redacted]
Sent: 30 January 2024 14:34
To: [Redacted]
Cc: [Redacted]
Subject: RE: UC Reminder: UC ACP-2023-022 Engagement Letter - Stage 1

Afternoon,

Please find attached the NATS NERL plc response to ACP-2023-022 Stage 1.

Regards



Manager NATS Operational Policy



NATS Internal

From: [Redacted]
Sent: Wednesday, January 24, 2024 3:11 PM
Subject: [EXTERNAL] UC Reminder: UC ACP-2023-022 Engagement Letter - Stage 1

Mimecast Attachment Protection has deemed this file to be safe, but always exercise caution when opening files.

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Dear sir or madam,

ACP-2023-022 Response Form – Stage 1

Name	[REDACTED]
Representing	NATS NERL plc
Address (including postcode if possible)	NATS 4000 Parkway Whiteley Fareham Hants PO15 7FL
<p>Feedback:</p> <p><u>Design Principle DP2</u></p> <p>Could be simplified/shortened to: The airspace design must meet operational and training objectives.</p> <p>This allows for meaningful comparison of airspace designs at the DPE stage, where amber partially meets the objectives and green fully meets the objectives. However, the ACP must also make clear those objectives (headline bullets rather than details), so the red/amber/green DPE decision (in stage 2) is transparent and consistently applied.</p> <p>This should be one step lower in priority than the Safety DP.</p> <p><u>Design Principle DP3</u></p> <p>The two clauses in the sentence of the original wording don't really work together.</p> <p>Could be simplified/shortened to: The airspace design should minimise the impact on other airspace users.</p> <p>Or, use the discretionary design principle (DDP4) from page 20 of CAP1616F: The airspace change proposal should satisfy the requirements of operators and owners of all classes of aircraft, including general aviation and other civilian airspace users.</p> <p>This should have the same priority as DP2.</p> <p><u>Design Principle DP4</u></p> <p>This DP is not in the CAP1616F "Environment" category, given that the context is for matters such as noise and CO2 rather than the operating environment. Instead, DP4 should be declared "Technical". The text is otherwise the same as DDP5 on p20 of CAP1616F.</p> <p>This should have the same priority as DP2.</p> <p>There are some concerns that a lack of RPAS integration policy is leading to a requirement to establish segregated airspace for this type of operation. This mere fact is likely to lead to cause impact to other stakeholders undermining the DP's intent.</p> <p><u>Design Principle DP5</u></p> <p>This text is the same as MDP3 on p20 of CAP1616F. This implies it should have a high priority, thus should have the same priority as DP1 Safety.</p> <p>Integration is Element 4 of the AMS. Whilst the DP itself is intending to demonstrate alignment with the AMS, the proposed solution does not.</p>	

Additional Comments

- The incorrect designation of DP4 leaves no true environmental DPs for this ACP, however given its military nature and for contingency purposes, this may not be an issue.
- The airspace required to support diversionary requirements should only be active for the minimal amount of time to achieve that objective in accordance with the principles of Flexible Use Airspace.
- If airspace segregation due to Protectors' inability to see and avoid is deployed into other airspace structures, the concept could lead to a disproportionate blocking of airspace compared to task.

This is a gentle reminder that feedback is encouraged regarding the suggested Design Principles for the airspace proposed at ACP-2023-022. If you do have any comments, and have not already done so, please send them by return of email by Tuesday 30 January 2024.

Kind regards.

Defence UAS Capability Development Centre



P Please consider the environment before printing this email.

From: UAS CDC-ACP

Sent: 02 January 2024 17:46

Subject: UC ACP-2023-022 Engagement Letter - Stage 1

Dear NATMAC member,

You are a key stakeholder in the Civil Airspace Publication (CAP) 1616 process for ACP-2023-047, which proposes segregated airspace at RAF Marham in the form of a Temporary Danger Area (TDA). Key aviation stakeholders were approached late last year for feedback on the temporary change.

The Change Sponsor is the MOD and is writing to you again with details of the first stage in the proposal of a permanent solution at RAF Marham in the form of a Danger Area (DA), to enable Protector to access RAF Marham as a nominated diversion airfield.

Full details of this proposed airspace change for Protector are included in an engagement letter which has been uploaded today to the CAA ACP Portal at this link:

[ACP-2023-022 Stage 1 Engagement Letter-1.0](#) (scroll down the page to Documents for this Proposal)

The letter explains the rationale behind the proposal and contains details of the suggested design principles against which the assessment and progression of all airspace change options will be measured.

Should you wish to comment please do so by email. A Response Form is attached here in Word format which you might find useful for your feedback. Comments are welcome in any written form, directly in an email if you prefer. The address at the top of the engagement letter will periodically be monitored for hard copy responses.

This airspace change is being managed under the ACP as outlined in CAP1616. Please note that the CAA has issued version 5 of CAP1616, which has been published and implemented on Tuesday 2nd January 2024. However, since preparations for Stage 1 of this ACP were underway prior to the review, the CAA agreed that the Change Sponsor should continue in accordance with the version 4 of CAP1616 for this stage only. All further stages of the ACP will follow the revised process.

The Change Sponsor has selected a 4 week duration for stakeholders to submit feedback at Stage 1. Therefore, stakeholders are requested to return any feedback by Tuesday 30 January 2024.

Email responses should be sent to:

The Airspace Change Manager at UAS CDC-ACP@qinetiq.com

Responses regarding the proposed airspace change must be received by Tuesday 30 January 2024

Defence UAS Capability Development Centre



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Archived: 06 February 2024 23:51:52

From:

To: [REDACTED]

Subject: RE: UC ACP-2023-022 - Stage 1:Final DPs

Importance: Normal

Sensitivity: None

You may have noted a minor error within the email below, whereby rationale for selected DPs 3 and 4 were the wrong way round..

Corrected table below:

DP#	Initial Cat	Initially Proposed DP	Revised DP	Rationale for Selected DP	Selected Cat
DP1	Safety	The airspace change proposal must maintain a high standard of safety and should seek to enhance current levels of safety	The airspace change proposal must maintain a high standard of safety and should seek to enhance levels of safety, wherever possible.	This DP was taken from CAP 1616 V5 Rather than delete 'should seek to enhance levels of safety', the Change Sponsor has inserted qualifying text 'wherever possible'. This is to acknowledge that safety remains the MOD top priority, however, this ACP is not seeking to enhance current levels.	Safety
DP2	Technical (MOD requirements)	The airspace provides access to a sufficient area to meet operational and training objectives.		N/A: No revision proposed.	Technical (MOD requirements)
DP3	Technical (Accessibility for airspace users)	The airspace change proposal should consider the requirements of other airspace users by maximising accessibility to other airspace users.	The airspace design should endeavour to maximise accessibility for other airspace users.	Simplified text.	Technical (Accessibility for airspace users)
DP4	Environment (Other aviation stakeholders)	The airspace change proposal should consider the impacts on air navigation service providers and other aviation stakeholders such as nearby airport operators.	The airspace change proposal should consider the impacts on all airspace users.	Switched to Technical category. Following feedback, amended to 'all airspace users' to encompass a broader range of stakeholders.	Technical (Impact for airspace users)
DP5	Policy	The airspace change proposal should not be inconsistent with relevant legislation, the CAA's airspace modernisation strategy or Secretary of State and CAA's policy and guidance.		N/A: No revision proposed.	Policy

Please accept my apologies for any confusion caused.

[REDACTED]

Defence UAS Capability Development Centre

[REDACTED]



From: UAS CDC-ACP

Sent: 02 February 2024 17:46

To: [REDACTED]

Subject: UC ACP-2023-022 - Stage 1:Final DPs

[REDACTED]

Thank you again for your continued feedback regarding the Design Principles regarding ACP-2023-022. Due to additional feedback received at the latter stages of engagement, it was assessed that some minor amendments should again be implemented to the final DPs.

Please see below table that describes proposed changes to the DPs, taking into account your comments and those of other stakeholders who sent feedback:

DP#	Initial Cat	Initially Proposed DP	Revised DP	Rationale for Selected DP	Selected Cat
DP1	Safety	The airspace change proposal must maintain a high standard of safety and should seek to enhance current levels of safety	The airspace change proposal must maintain a high standard of safety and should seek to enhance levels of safety, wherever possible.	This DP was taken from CAP 1616 V5 Rather than delete 'should seek to enhance levels of safety', the Change Sponsor has inserted qualifying text 'wherever possible'. This is to acknowledge that safety remains the MOD top priority, however, this ACP is not seeking to enhance current levels.	Safety
DP2	Technical (MOD requirements)	The airspace provides access to a sufficient area to meet operational and training objectives.		Simplified text.	Technical (MOD requirements)
DP3 (Accessibility for airspace users)	Technical	The airspace change proposal should consider the requirements of other airspace users by maximising accessibility to other airspace users.	The airspace design should endeavour to maximise accessibility for other airspace users	N/A: No revision proposed.	Technical (Accessibility for airspace users)
DP4 (Other aviation stakeholders)	Environment	The airspace change proposal should consider the impacts on air navigation service providers and other aviation stakeholders such as nearby airport operators.	The airspace change proposal should consider the impacts on all airspace users.	Following feedback, amended to 'all airspace users' to encompass a broader range of stakeholders.	Technical (Impact for airspace users)
DP5	Policy	The airspace change proposal should not be inconsistent with relevant legislation, the CAA's airspace modernisation strategy or Secretary of State and CAA's policy and guidance.		N/A: No revision proposed	Policy

Prioritisation:

Safety is the highest priority and so DP1 is automatically assigned Priority 1

After consideration, the Change Sponsor elected to retain DP2 as a higher priority than DP3 and DP4 due to the necessity of airspace suitable in size and shape to enable Protector to complete its training and operational objectives.

Since there was no feedback from local airspace users distinguishing the order of priority between DP3 and DP 4, thus the prioritisation of these DPs was altered and both were allocated same priority.

One stakeholder noted the text for DP 5 is the same as MDP3 on p20 of CAP1616F and implied it should have the same priority as DP1 and implied it should have the same priority as DP1. In allocating priorities the Change Sponsor believes that DP 1 and DP 2 remain their highest priorities. That said, in acknowledging Stakeholder comments, the Change Sponsor had elevated DP5 above DP 3 and DP4.

Priority	Ref	Design Principle
1	DP1	The airspace change proposal must maintain a high standard of safety and should seek to enhance levels of safety, wherever possible.
2	DP2	The airspace provides access to a sufficient area to meet operational and training objectives.
3	DP5	The airspace change proposal should not be inconsistent with relevant legislation, the CAA's airspace modernisation strategy or Secretary of State and CAA's policy and guidance.
4	DP3	The airspace design should endeavour to maximise accessibility for other airspace users.
	DP4	The airspace change proposal should consider the impacts on all airspace users.

It is hoped the wording above satisfies all stakeholders that consideration was given to all comments received and that repeated communication to you regarding the amendments has not had detrimental impact to your engagement.

It would be greatly appreciated if you are able to return either consent or any further comments regarding the Design Principles, via return of email by 6 February. A prompt response will enable us to submit the Design Principles to the CAA for regulatory assessment.

Once again, your participation in the ACP engagement is most welcomed.

Kind regards,

Defence UAS Capability Development Centre



From: [Redacted]
Sent: 01 February 2024 14:47
To: [Redacted]
Subject: RE: UC FW: UC ACP-2023-022 Engagement Letter - Stage 1



Thanks.

Kind regards



From: [Redacted]
Sent: Thursday, January 25, 2024 7:33 PM
To: [Redacted]
Subject: UC FW: UC ACP-2023-022 Engagement Letter - Stage 1



Further to the email below, and after some more deliberation, it is proposed the wording of the Design will be adjusted as follows:

DP number	Initial Proposed DP	Suggested DP	Revised DP	Rationale
DP1	The airspace change proposal must maintain a high standard of safety and should seek to enhance current levels of safety.	The airspace change proposal must maintain current levels of safety and should seek to enhance levels of safety wherever possible.	The airspace change proposal must maintain a high standard of safety and should seek to enhance levels of safety wherever possible .	It may not be possible for the Change Sponsor to measure current levels of safety to use as evidence to support that the airspace design(s) will maintain or enhance safety levels. A high standard of safety through design is a more viable basis for meeting the Statement of Need.
DP2	The airspace provides access to a sufficient area to meet operational and training objectives.	No change.	No change from initial proposed DP.	N/A
DP3	The airspace change proposal should consider the requirements of other airspace users by maximising accessibility to other airspace users.	The airspace change proposal should address the requirements of other airspace users by maximising accessibility to other airspace users.	No change from initial proposed DP.	It may not be possible to address requirements of airspace users (particularly as all requirements may not yet be known). However, all requirements brought to the attention of the Change Sponsor will be taken into consideration and accommodated wherever possible.
DP4	The airspace change proposal should consider the impacts on air navigation service providers and other aviation stakeholders such as nearby airport operators.	The airspace change proposal should consider the impact on air navigation service providers and other aviation stakeholders such as local airport, airfield, airstrip and air vehicle operators .	As per suggested DP	Airfields, airstrips and air vehicle operators have been specified as these groups are already identified stakeholders through ACP-2023-047.

DP5	The airspace change proposal should not be inconsistent with relevant legislation, the CAA's airspace modernisation strategy or Secretary of State and CAA's policy and guidance.	No change.	No change from initial proposed DP.	N/A
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It is hoped the rationale behind the amendments sufficiently explain the selected wording. Should you have any additional comments on the DP, please present them before the Stage 1 deadline of 30 Jan 24. As previously mentioned, your continued feedback throughout the ACP process is welcomed.

Kind regards,



Defence UAS Capability Development Centre



From: UAS CDC-ACP

Sent: 11 January 2024 14:39

To: [Redacted]

Subject: RE: UC ACP-2023-022 Engagement Letter - Stage 1

Good afternoon [Redacted]

Thank you for your response to the Sage 1 Engagement Letter for ACP-2023-022.

Your feedback has been taken into consideration and as a result the Design Principles have been reviewed. Please find below proposed amendment for your comment.

DP number	Initial Proposed DP	Revised DP for Consideration
DP1	The airspace change proposal must maintain a high standard of safety and should seek to enhance current levels of safety.	The airspace change proposal must maintain current levels of safety and should seek to enhance levels of safety wherever possible.
DP2	The airspace provides access to a sufficient area to meet operational and training objectives.	No change (see below ref training objectives).
DP3	The airspace change proposal should consider the requirements of other airspace users by maximising accessibility to other airspace users.	The airspace change proposal should address the requirements of other airspace users by maximising accessibility to other airspace users.
DP4	The airspace change proposal should consider the impacts on air navigation service providers and other aviation stakeholders such as nearby airport operators.	The airspace change proposal should consider the impact on air navigation service providers and other aviation stakeholders such as local airport, airfield, airstrip and air vehicle operators.
DP5	The airspace change proposal should not be inconsistent with relevant legislation, the CAA's airspace modernisation strategy or Secretary of State and CAA's policy and guidance.	No change.

Training objectives noted at DP2 are yet to be quantified, but it expected that training will be in the form of infrequent sorties to practice the diversion only. Synthetic training will be the preferred method of training and therefore live training will be kept to a minimum.

On the subject of linked airspace changes, I'm afraid the manner in which the MOD submits airspace change proposals is out of scope for Stage 1 engagement. Also, not pertinent at this stage is the equipment

configuration and operational requirement of the air vehicle. The trial TDA under ACP-2023-047 is transparent in that the objective is to test the design for a permanent DA, as described within the Introduction of the TDA engagement letter. The CAA is cognisant of the requirement and has approved the route to propose such via an ACP.

Please be assured that all feedback received for this ACP will be submitted to the CAA as evidence of engagement with stakeholders, with redacted copies available on the CAA Portal for public view.

I hope this response addresses your initial feedback, but please continue to engage throughout the process with any suggestions or queries. If you would like to discuss the proposed airspace change in person (or via a representative), there will be an update on both the TDA and DA proposals at the East Anglia Airspace Users Working Group (EAAUWG), at RAF Marham on 16 Jan 2024.

Kind regards,



Defence UAS Capability Development Centre



From: [Redacted]

Sent: 03 January 2024 09:24

To: [Redacted]

Subject: RE: UC ACP-2023-022 Engagement Letter - Stage 1



British Gliding Association



Thanks for your engagement re ACP-2023-022.

We note that this ACP is described as a requirement that will facilitate operation of the recently established permanent danger area at Waddington. We strongly object to the way the MOD has implemented an airspace change and separately, after the event, added another directly operationally linked airspace change. By doing so, the MoD has effectively ensured that the ACP is going to be approved by CAA. In effect, stakeholders are not positioned to challenge it. Had both directly linked ACPs been consulted on together, stakeholders would have been made aware up front of the total impact of the changes being proposed. This is the second MoD ACP application that has used this approach; the temporary and permanent DA ACPs related to the RAFAT relocation were similarly obscured.

Turning to the Design Principles, we note:

DP number	Proposed DP	Comment
DP1	The airspace change proposal must maintain a high standard of safety and should seek to enhance current levels of safety.	The activity that is being imported by the MoD slightly reduces the level of safety. There is no justification for using an ACP to <i>enhance</i> current levels of safety - the ACP must maintain the current standard of safety.
DP2	The airspace provides access to a sufficient area to meet operational and training objectives	The ACP is justified as a contingency diversion requirement. As training will change the utility of the proposed danger area, what training objectives does the MoD have in mind?
DP3	The airspace change proposal should consider the requirements of other airspace users by maximising accessibility to other airspace users	The ACP implies a significant volume of restricted access airspace. The ACP should <i>address</i> the requirements of other airspace users and maximise accessibility by other airspace users.
DP4	The airspace change proposal should consider the impacts on air navigation service providers and other aviation stakeholders such as nearby airport	Other aviation stakeholders include operators not based on an airport, for example airfields and strips.

	operators	
DP5	The airspace change proposal should not be inconsistent with relevant legislation, the CAA's airspace modernisation strategy or Secretary of State and CAA's policy and guidance	No comment.

We are also concerned that the MoD is implementing RPAS operations without enabling the available DAA technology and in doing so is adding yet more complexity and restrictions to the UK's lower airspace.

Please share our response with the CAA.

We look forward to further engagement on this ACP.

Kind regards

[Redacted]

British Gliding Association

From: [Redacted]
Sent: Tuesday, January 2, 2024 5:46 PM
Subject: UC ACP-2023-022 Engagement Letter - Stage 1

Dear NATMAC member,

You are a key stakeholder in the Civil Airspace Publication (CAP) 1616 process for ACP-2023-047, which proposes segregated airspace at RAF Marham in the form of a Temporary Danger Area (TDA). Key aviation stakeholders were approached late last year for feedback on the temporary change.

The Change Sponsor is the MOD and is writing to you again with details of the first stage in the proposal of a permanent solution at RAF Marham in the form of a Danger Area (DA), to enable Protector to access RAF Marham as a nominated diversion airfield.

Full details of this proposed airspace change for Protector are included in an engagement letter which has been uploaded today to the CAA ACP Portal at this link:

[ACP-2023-022 Stage 1 Engagement Letter-1.0](#) (scroll down the page to Documents for this Proposal)

The letter explains the rationale behind the proposal and contains details of the suggested design principles against which the assessment and progression of all airspace change options will be measured.

Should you wish to comment please do so by email. A Response Form is attached here in Word format which you might find useful for your feedback. Comments are welcome in any written form, directly in an email if you prefer. The address at the top of the engagement letter will periodically be monitored for hard copy responses.

This airspace change is being managed under the ACP as outlined in CAP1616. Please note that the CAA has issued version 5 of CAP1616, which has been published and implemented on Tuesday 2nd January 2024. However, since preparations for Stage 1 of this ACP were underway prior to the review, the CAA agreed that the Change Sponsor should continue in accordance with the version 4 of CAP1616 for this stage only. All further stages of the ACP will follow the revised process.

The Change Sponsor has selected a 4 week duration for stakeholders to submit feedback at Stage 1. Therefore, stakeholders are requested to return any feedback by Tuesday 30 January 2024.

Email responses should be sent to:

The Airspace Change Manager at UASCDC-ACP@qinetiq.com

Responses regarding the proposed airspace change must be received by Tuesday 30 January 2024



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Archived: 06 February 2024 23:20:14

From:

Bcc:

Subject: UC ACP-2023-022 Engagement Letter - Stage 1

Importance: Normal

Sensitivity: None

Attachments:

[ACP-2023-022 Engagement Response Form - Stage 1.docx](#);

Dear NATMAC member,

You are a key stakeholder in the Civil Airspace Publication (CAP) 1616 process for ACP-2023-047, which proposes segregated airspace at RAF Marham in the form of a Temporary Danger Area (TDA). Key aviation stakeholders were approached late last year for feedback on the temporary change.

The Change Sponsor is the MOD and is writing to you again with details of the first stage in the proposal of a permanent solution at RAF Marham in the form of a Danger Area (DA), to enable Protector to access RAF Marham as a nominated diversion airfield.

Full details of this proposed airspace change for Protector are included in an engagement letter which has been uploaded today to the CAA ACP Portal at this link:

[ACP-2023-022 Stage 1 Engagement Letter-1.0](#) (scroll down the page to Documents for this Proposal)

The letter explains the rationale behind the proposal and contains details of the suggested design principles against which the assessment and progression of all airspace change options will be measured.

Should you wish to comment please do so by email. A Response Form is attached here in Word format which you might find useful for your feedback. Comments are welcome in any written form, directly in an email if you prefer. The address at the top of the engagement letter will periodically be monitored for hard copy responses.

This airspace change is being managed under the ACP as outlined in CAP1616. Please note that the CAA has issued version 5 of CAP1616, which has been published and implemented on Tuesday 2nd January 2024. However, since preparations for Stage 1 of this ACP were underway prior to the review, the CAA agreed that the Change Sponsor should continue in accordance with the version 4 of CAP1616 for this stage only. All further stages of the ACP will follow the revised process.

The Change Sponsor has selected a 4 week duration for stakeholders to submit feedback at Stage 1. Therefore, stakeholders

are requested to return any feedback by Tuesday 30 January 2024.

Email responses should be sent to:

The Airspace Change Manager at UASCDC-ACP@qinetiq.com

Responses regarding the proposed airspace change must be received by Tuesday 30 January 2024

Defence UAS Capability Development Centre



P Please consider the environment before printing this email.

Archived: 06 February 2024 23:20:19

From:

Bcc:

Subject: UC ACP-2023-022 Engagement Letter - Stage 1

Importance: Normal

Sensitivity: None

Attachments:

[ACP-2023-022 Engagement Response Form - Stage 1.docx](#);

Dear sir or madam,

You have been identified as a key stakeholder in the Civil Airspace Publication (CAP) 1616 process for a permanent airspace change which is being sponsored by the Ministry of Defence in the vicinity of RAF Marham. This change under the identification number ACP-2023-022 proposes to establish a volume of airspace centred on RAF Marham which will enable a large Remotely Piloted Air System (RPAS), Protector RG Mk1, to access RAF Marham as a diversion airfield in the event that, for any unforeseen reason, RAF Waddington becomes unavailable.

Full details of this proposed airspace change for Protector are included in an engagement letter which has been uploaded today to the CAA ACP Portal at this link:

[ACP-2023-022 Stage 1 Engagement Letter-1.0](#) (scroll down the page to Documents for this Proposal)

The letter explains the rationale behind the proposal and contains details of the suggested design principles against which the assessment and progression of all airspace change options will be measured.

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Responses regarding the proposed airspace change must be received by Tuesday 30 January 2024



P *Please consider the environment before printing this email.*

Archived: 06 February 2024 23:20:24

From:

To: [REDACTED]

Subject: UC ACP-2023-022 Engagement Letter - Stage 1

Importance: Normal

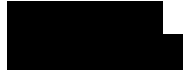
Sensitivity: None

Attachments:

[ACP-2023-022 Engagement Response Form - Stage 1.docx](#);

Dear Sir/Madam,

I have been made aware that the initial email was sent to Luis Barbero as a key stakeholder in the Civil Airspace Publication (CAP) 1616 process for ACP-2023-022, and this email may have not been forwarded or actioned. Please find below details of this proposal and how you can contribute and provide feedback. Please advise if you require an extension of 6 days to the deadline within which to submit a response.



Defence UAS Capability Development Centre



From: UAS CDC-ACP

Sent: 02 January 2024 17:45

Subject: UC ACP-2023-022 Engagement Letter - Stage 1

Dear sir or madam,

You were identified as a key aviation stakeholder in the Civil Airspace Publication (CAP) 1616 process for ACP-2023-047, which proposes segregated airspace at RAF Marham in the form of a Temporary Danger Area (TDA). Key aviation stakeholders were approached late last year for feedback on the temporary change.

The Change Sponsor is the MOD and is writing to you again with details of the first stage in the proposal of a permanent solution at RAF Marham in the form of a Danger Area (DA), to enable Protector to access RAF Marham as a nominated diversion airfield.

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The letter explains the rationale behind the proposal and contains details of the suggested design principles against which the assessment and progression of all airspace change options will be measured.

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The Airspace Change Manager at UASCDC-ACP@qinetiq.com

Responses regarding the proposed airspace change must be received by Tuesday 30 January 2024

Defence UAS Capability Development Centre



P *Please consider the environment before printing this email.*

Archived: 06 February 2024 23:20:29

From:

Bcc: [REDACTED]

Subject: UC FW: UC ACP-2023-022 Engagement Letter - Stage 1

Importance: Normal

Sensitivity: None

Attachments:

[ACP-2023-022 Engagement Response Form - Stage 1.docx](#);

From: UASCDC-ACP

Sent: 02 January 2024 17:46

Subject: UC ACP-2023-022 Engagement Letter - Stage 1

Dear NATMAC member,

You are a key stakeholder in the Civil Airspace Publication (CAP) 1616 process for ACP-2023-047, which proposes segregated airspace at RAF Marham in the form of a Temporary Danger Area (TDA). Key aviation stakeholders were approached late last year for feedback on the temporary change.

The Change Sponsor is the MOD and is writing to you again with details of the first stage in the proposal of a permanent solution at RAF Marham in the form of a Danger Area (DA), to enable Protector to access RAF Marham as a nominated diversion airfield.

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The letter explains the rationale behind the proposal and contains details of the suggested design principles against which the assessment and progression of all airspace change options will be measured.

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The Airspace Change Manager at UASCDC-ACP@qinetiq.com

Responses regarding the proposed airspace change must be received by Tuesday 30 January 2024

Defence UAS Capability Development Centre



P *Please consider the environment before printing this email.*

Archived: 06 February 2024 23:20:34

From:

To: [REDACTED]

Subject: UC FW: UC ACP-2023-022 Engagement Letter - Stage 1

Importance: Normal

Sensitivity: None

Attachments:

[ACP-2023-022 Engagement Response Form - Stage 1.docx](#);

Forwarded on receipt of Out of Office notification from Alan Ward.

From: UASCDC-ACP

Sent: 02 January 2024 17:45

Subject: UC ACP-2023-022 Engagement Letter - Stage 1

Dear sir or madam,

You were identified as a key aviation stakeholder in the Civil Airspace Publication (CAP) 1616 process for ACP-2023-047, which proposes segregated airspace at RAF Marham in the form of a Temporary Danger Area (TDA). Key aviation stakeholders were approached late last year for feedback on the temporary change.

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The letter explains the rationale behind the proposal and contains details of the suggested design principles against which the assessment and progression of all airspace change options will be measured.

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Defence UAS Capability Development Centre



P Please consider the environment before printing this email.

Archived: 06 February 2024 23:20:39

From:

Bcc:

Subject: UC FW: UC ACP-2023-022 Engagement Letter - Stage 1

Importance: Normal

Sensitivity: None

Attachments:

[ACP-2023-022 Engagement Response Form - Stage 1.docx](#);

Dear Sir/Madam,

I have been made aware that you may also be a key stakeholder in the Civil Airspace Publication (CAP) 1616 process for ACP-2023-022. Please find below details of this proposal and how you can contribute and provide feedback. Please advise if you require an extension of 2 days to the deadline within which to submit a response.


Defence UAS Capability Development Centre



From: UAS CDC-ACP

Sent: 02 January 2024 17:45

Subject: UC ACP-2023-022 Engagement Letter - Stage 1

Dear sir or madam,

You were identified as a key aviation stakeholder in the Civil Airspace Publication (CAP) 1616 process for ACP-2023-047, which proposes segregated airspace at RAF Marham in the form of a Temporary Danger Area (TDA). Key aviation stakeholders were approached late last year for feedback on the temporary change.

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The Airspace Change Manager at UASCDC-ACP@qinetiq.com

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Defence UAS Capability Development Centre



P Please consider the environment before printing this email.

Archived: 06 February 2024 23:20:44

From:

To: [REDACTED]

Cc: [REDACTED]

Subject: UC FW: UC FW: UC ACP-2023-022 Engagement Letter - Stage 1

Importance: Normal

Sensitivity: None

Attachments:

[ACP-2023-022 Engagement Response Form - Stage 1.docx](#);

Dear Sir/Madam,

I have been made aware that you are also be a key stakeholder in the Civil Airspace Publication (CAP) 1616 process for ACP-2023-022. Please find below details of this proposal and how you can contribute and provide feedback. Please advise if you require an extension of 6 days to the deadline within which to submit a response.

[REDACTED]

Defence UAS Capability Development Centre

[REDACTED]



From: UAS CDC-ACP

Sent: 02 January 2024 17:45

Subject: UC ACP-2023-022 Engagement Letter - Stage 1

Dear sir or madam,

You were identified as a key aviation stakeholder in the Civil Airspace Publication (CAP) 1616 process for ACP-2023-047, which proposes segregated airspace at RAF Marham in the form of a Temporary Danger Area (TDA). Key aviation stakeholders were approached late last year for feedback on the temporary change.

The Change Sponsor is the MOD and is writing to you again with details of the first stage in the proposal of a permanent solution at RAF Marham in the form of a Danger Area (DA), to enable Protector to access RAF Marham as a nominated diversion airfield.

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The Airspace Change Manager at UASCDC-ACP@qinetiq.com

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Defence UAS Capability Development Centre



P Please consider the environment before printing this email.

Archived: 06 February 2024 23:20:49

From:

To: [REDACTED]

Subject: UC FW: UC Reminder: UC ACP-2023-022 Engagement Letter - Stage 1

Importance: Normal

Sensitivity: None

Attachments:

[ACP-2023-022 Engagement Response Form - Stage 1.docx](#);

[REDACTED]

This was sent to [REDACTED] as per the NATMAC contact list from CAA, but realised it might be useful to send direct to you also.

Please advise if you would like additional time to consider the DPs.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

www.QinetiQ.com | [Our blog](#) | [LinkedIn](#) | [Twitter](#)

From: UASCDC-ACP
Sent: 24 January 2024 15:11
Subject: UC Reminder: UC ACP-2023-022 Engagement Letter - Stage 1

Dear sir or madam,

This is a gentle reminder that feedback is encouraged regarding the suggested Design Principles for the airspace proposed at ACP-2023-022. If you do have any comments, and have not already done so, please send them by return of email by Tuesday 30 January 2024.

Kind regards.

Defence UAS Capability Development Centre



 Please consider the environment before printing this email.

From: UASCDC-ACP

Sent: 02 January 2024 17:46

Subject: UC ACP-2023-022 Engagement Letter - Stage 1

Dear NATMAC member,

You are a key stakeholder in the Civil Airspace Publication (CAP) 1616 process for ACP-2023-047, which proposes segregated airspace at RAF Marham in the form of a Temporary Danger Area (TDA). Key aviation stakeholders were approached late last year for feedback on the temporary change.

The Change Sponsor is the MOD and is writing to you again with details of the first stage in the proposal of a permanent solution at RAF Marham in the form of a Danger Area (DA), to enable Protector to access RAF Marham as a nominated diversion airfield.

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Defence UAS Capability Development Centre



P *Please consider the environment before printing this email.*

Archived: 06 February 2024 23:20:54

From:

To: [REDACTED]

Subject: RE: UC Engagement letter

Importance: Normal

Sensitivity: None

Good morning [REDACTED]

Yes, the letter was intended for the Parish Councillors. Please do forward on the letter and also advise if the councillors would like a short extension to the feedback deadline.

If all future correspondence should be sent direct to an alternative email address, please let me know.

Kind regards,

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

www.QinetiQ.com | [Our blog](#) | [LinkedIn](#) | [Twitter](#)

From: [REDACTED]

Sent: 17 January 2024 18:34

To: UASCDC-ACP <UASCDC-ACP@qinetiq.com>

Subject: Engagement letter

Dear Sir

Is this letter for the parish councillors of Barton Bendish?

If so is it OK to forward to all parish councillors?

Kind regards

[REDACTED]

Archived: 06 February 2024 23:20:58

From:

Bcc:

Subject: UC ACP-2023-022 Engagement Letter - Stage 1

Importance: Normal

Sensitivity: None

Attachments:

[ACP-2023-022 Engagement Response Form - Stage 1.docx](#);

Dear sir or madam,

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Defence UAS Capability Development Centre



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