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# Ministry of Defence

Gateway documentation:  
Stage 3 CONSULT

## Draft Consultation Strategy

**ACP-2023-022**

**Roles**

<b>Action</b>	<b>Role</b>	<b>Date</b>
Produce	Airspace Change Team	15 May 2024
Review	DAATM	16 May 2024
Approve	Change Sponsor RAF AIR Cap	17 May 2024

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## Contents

Glossary of Terms	iii
Introduction	iv
1 Consultation Objectives	1
1.1 CAP 1616 Requirements	1
1.2 Consultation Strategy Objectives	1
2 Engagement Activity Undertaken to Date	2
2.1 ACP-2023-047	2
2.2 Online Meetings	2
2.3 Written communication	2
2.4 Face to face communication	2
2.5 Engagement Summary	2
2.6 Engagement Feedback	3
2.7 Next steps	3
3 Audience	5
3.1 Stakeholder Overview	5
3.2 Non-Aviation Stakeholders	5
3.3 Environmental Organisations	5
3.4 Aviation Stakeholders	5
4 Approach	6
4.1 Communication approach	6
4.2 Launch	6
4.3 Webinar	6
UASCDC-ACP@qinetiq.com	6
To join the meeting via Teams: click here	7
Meeting ID: 364 986 471 595	7
Passcode: HLtLZn	7
To Dial-in by phone:	7
Dial: +44 20 3443 8728#	7
Phone conference ID: 242 913 365#	7
4.4 Citizen Space	7
4.1 Reminders to stakeholders	7
4.2 Postal submissions	7
4.3 Response Management	8

4.4	Summary of the Key Stages of the Consultation Strategy	8
4.5	Materials	9
4.6	Consultation Document	9
4.7	Frequently Asked Questions (FAQ)	9
4.8	'At a Glance' Overview	9
4.9	Full Options Appraisal	9
4.10	Feedback Form	9
4.11	Webinar presentation	9
4.12	Accessibility	9
5	Consultation Length	10
5.1	Consultation Period	10
6	Post-consultation	11
6.1	Collate and review responses	11
6.2	Stage 4 – Update and Submit	11
	Appendix A – ACP-2023-022 Stakeholder List	A-1
	Appendix B – Consultation Feedback Form	B-1
	Appendix C – ACP-2023-022 – AT A GLANCE	C-1

## Glossary of Terms

Term	Description
ACP	Airspace Change Proposal
ANSP	Air Navigation Services Provider
BVLOS	Beyond Visual Line Of Sight
CAA	Civil Aviation Authority
CAP	Civil Aviation Publication
DP	Design Principle
EAAUWG	East Anglia Airspace Users Working Group
FAQ	Frequently Asked Questions
MAA	Military Aviation Authority
MATZ	Military Air Traffic Zone
MOB	Main Operating Base
MOD	Ministry of Defence
MP	Member of Parliament
NATMAC	National Air Traffic Management Advisory Committee
NATS	National Air Traffic Services
RAF	Royal Air Force
RPAS	Remotely Piloted Air System
SME	Subject Matter Expert
SON	Statement Of Need
TDA	Temporary Danger Area

## Introduction

The main operating base (MOB) for the large Remotely Piloted Air System (RPAS), Protector RG Mk1 is RAF Waddington, where permanent segregated airspace in the form of a danger area has already been established. The danger area is EG D324A/B, which was implemented at the end of November 2023.

Under current timescales, routine Protector operations are likely to commence from RAF Waddington in Summer 2024 when the MOD will conduct test and evaluation activities prior to Protector formally entering into service. During this, and for future activity in the UK, Protector will require a nominated permanent diversion airfield to be made available in the event that, for any unforeseen reason, RAF Waddington becomes unavailable. Following investigation into several military airfields, RAF Marham, Norfolk, has been identified as the most suitable and preferred diversion airfield. Whilst Protector's MOB remains RAF Waddington there may be occasions when access to RAF Marham is required for operational reasons. Access to RAF Marham as early as June 2024 was managed under a separate MOD ACP (identification number ACP-2023-047<sup>1</sup>). The ACP has been recently approved by the Civil Aviation Authority (CAA) and will enable an airspace trial to take place to test the procedures at RAF Marham as the diversion airfield.

This airspace change proposal (ACP) seeks to establish suitable airspace to enable Protector RG Mk1 safe and efficient access to RAF Marham as a nominated diversion airfield. Version 2.0 of the Statement of Need (SON) can be viewed via the CAA ACP Portal<sup>2</sup> and states that the objective of the proposed change is to establish suitable airspace enabling safe and efficient access to a nominated diversion airfield for the Beyond Visual Line Of Sight (BVLOS<sup>3</sup>) RPAS, Protector. The Ministry of Defence (MOD), and specifically Air Capability, is the Change Sponsor for this proposal (identification number ACP-2023-022).

ACP-2023-022 has completed Stage 1 (Define) and Stage 2 (Develop and Assess) with all the supporting documentation uploaded to the CAA ACP Portal and have commenced Stage 3, (Consult).

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<sup>1</sup> Access to RAF Marham as a nominated diversion airfield as early as June 2024 has been managed under an airspace trial (see ACP-2023-047 on the CAA ACP Portal) For more details see here: [Airspace change proposal public view \(caa.co.uk\)](#)

<sup>2</sup> The SON can be found on the CAA ACP Portal here: [Airspace change proposal public view \(caa.co.uk\)](#)

<sup>3</sup> The MAA Master Glossary defines BVLOS as the operation of a Remotely Piloted Aircraft beyond a distance where the Remote Pilot is able to respond to or avoid other airspace users by visual means.

# 1 Consultation Objectives

## 1.1 CAP 1616 Requirements

1.1.1 The CAA Civil Aviation Publication (CAP) 1616 provides guidance on the regulatory process for changing the notified airspace design and planned and permanent redistribution of air traffic, and on providing airspace information. The requirements for Stage 3, consultation preparation, are as follows:

- Produce a Consultation Strategy detailing the scale, nature and timescales of the proposed consultation;
- Produce a Consultation Document and materials that allow stakeholders – including those with no technical expertise – to understand the potential impact of the proposed changes;
- Produce a Full Options Appraisal identifying potential impacts and mapping potentially affected stakeholders.
- Provide additional assessments for Habitats Regulations Assessment as specified by the CAA;

## 1.2 Consultation Strategy Objectives

1.2.1 This document addresses the requirement for the Consultation Strategy and is designed to meet the following objectives:

- Identify the stakeholders likely to be impacted, positively or negatively;
- Explain the information requirements of all stakeholders, including ‘seldom-heard audiences’, taking into consideration a variety of formats that may be necessary, or that may be of benefit to achieving effective outputs from the consultation;.
- Describe how audiences will be informed and the methods by which they can engage and respond;
- Consider whether it is appropriate to use intermediaries to communicate with impacted Stakeholders;
- Determine whether individual properties need to be contacted, or provide rationale for alternative methods to reach specific communities;
- Provide details of the consultation duration, together with rationale for a reduced consultation period;
- Outline a timetable of consultation activities that will facilitate effective engagement with stakeholders;
- Explain the actions to be taken to maximise stakeholder participation, minimise the potential for ineffective stakeholder output and propose contingencies for unexpected events;
- Describe how stakeholders will be provided with enough information to understand what is proposed and enable the submission of informed responses;
- Provide source details of all data, to demonstrate the most up-to-date and credible information has been obtained, explaining how any modelling has been carried out.

## 2 Engagement Activity Undertaken to Date

The MOD conducted engagement up to the conclusion of Stage 2 through the following means:

### 2.1 ACP-2023-047

2.1.1 Under a separate airspace change proposal (identification number ACP-2023-047)<sup>4</sup>, a trial has been approved at RAF Marham in the form of a Temporary Danger Area (TDA). The trial seeks to confirm the suitability of RAF Marham as the permanent diversion airfield for Protector. The area affected for the airspace trial and the permanent solution are the same, and as such the engagement for the trial is relevant to this proposal<sup>5</sup>; thus, the identified stakeholders for the trial are duplicated for this ACP. A list of stakeholders is at Appendix A.

### 2.2 Online Meetings

2.2.1 During the engagement activities for the trial (ACP-2023-047), an online meeting was held with the air navigation service provider (ANSP), NATS, during which early airspace design options for this ACP were also discussed. Minutes of the meeting and associated presentation slides are included in the engagement material evidence in Appendix C of Stage 2, Airspace Change Design Options and Design Principles Evaluation, accessible via the Airspace Change Portal.

### 2.3 Written communication

2.3.1 Emails and reminders were distributed to all stakeholders with a letter containing details of the design principles (DP), baseline scenarios and proposed design options, together with details of how stakeholders could provide feedback at Stages 1 and 2 of the proposal. The Change Sponsor continued with written communication as feedback was received where appropriate.

### 2.4 Face to face communication

2.4.1 The Change Sponsor's ACP Manager attended the East Anglia Airspace User Working Group (EAAUWG) at RAF Marham on 16 January 2024 and a presentation was delivered 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. The presentation and minutes from the EAAUWG can be found at Appendix C of ACP-2023-022 Stage 2, Airspace Change Design Options and Design Principles Evaluation submission, accessible via the Airspace Change Portal.

### 2.5 Engagement Summary

2.5.1 Table 1 below summarises the engagement activities undertaken during the ACP process.

<i>Table 1: Chronology of ACP-2023-022 Engagement</i>		
Date	Action / Stakeholders Contacted	Notes
6 December 2023	Online meeting held with NATS	The meeting record can be found at Appendix C of Stage 2, Airspace Change Design Options and Design Principles Evaluation via the Airspace Change Portal
2 January 2024	Stage 1 engagement material sent to all stakeholders	The engagement material and feedback received can be viewed at Appendix C of Stage 2, Airspace Change Design Options

<sup>4</sup> Access to RAF Marham as a nominated diversion airfield as early as June 2024 has been managed under an airspace trial (see ACP-2023-047 on the CAA ACP Portal). For more details see: <https://airspacechange.caa.co.uk/PublicProposalArea?pID=574>

<sup>5</sup> See paragraphs 2.6 and 3.1



		And Design Principles Evaluation, via the Airspace Change Portal
16 January 2024	Presentation delivered at EAAUWG	Minutes of the EAAUWG can be viewed at Appendix C of Stage 2, Airspace Change Design Options and Design Principles Evaluation via the Airspace Change Portal
25 January 2024	Reminder of deadline for Stage 1 feedback sent to stakeholders	The email distributed to all stakeholders can be viewed at Appendix C of Stage 1, Design Principles and Stakeholder Engagement via the Airspace Change Portal
4 March 2024	Stage 2 Engagement material sent to all stakeholders	The engagement material and feedback received can be viewed at Appendix C of Stage 2, Airspace Change Design Options and Design Principles Evaluation via the Airspace Change Portal
21 March 2024	Reminder of deadline for Stage 2 feedback sent to stakeholders, prompting those yet to submit their feedback	The email distributed to all stakeholders can be viewed at Appendix C of Stage 2, Airspace Change Design Options and Design Principles Evaluation via the Airspace Change Portal.

## 2.6 Engagement Feedback

2.6.1 Stage 1 Engagement. 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. As a result of the engagement, minor adjustments were made to some of the DPs proposed.

2.6.2 Stage 2 Engagement. The formal period for stakeholders to send feedback on Stage 2 engagement material was 4 Mar - 5 Apr 2024. The Change Sponsor felt this was an appropriate period due to the anticipated impact of the proposed airspace, as well as engagement already conducted for the airspace trial. Of the 114<sup>6</sup> identified stakeholders contacted, 15 responded. Key themes for comment were:

- Five stakeholders preferred Option 2; three felt both the options were suitable; one preferred Option 1; six stakeholders did not specify a preference;
- Accessibility of the segregated airspace for other airspace users;
- Insufficient knowledgeable by Local Authorities on the subject matter to provide informed feedback;
- Level of the vertical division between the two sections in Option 2;
- Classification of the segregated airspace as Class G was considered most suitable.

## 2.7 Next steps

2.7.1 Using the most up-to-date and credible data available, the consultation documents, including the Full Options Appraisal, have been developed around the engagement feedback gained as part of Stages 1 and 2. The consultation and supporting materials have been produced

<sup>6</sup> At Stage 2 this number was stated as 115; the Change Sponsor subsequently noticed a duplication on the stakeholder list; there are 114 stakeholders in total.

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to suit a range of audiences. Whilst it is necessary to use some technical terms in order to adequately describe this airspace change and the issues around it, materials will be as concise and accessible as possible to those without aviation or technical knowledge. In view of feedback from non-aviation stakeholders, the Change Sponsor will also publish an 'At a Glance' document, to provide a simplified precis of the proposed airspace and anticipated impact.

## **3 Audience**

### **3.1 Stakeholder Overview**

3.1.1 In creating a comprehensive stakeholder list the MOD has considered all who may be impacted (positively, negatively and potentially impacted) as well as those that may just have an awareness or interest in the change proposal. The MOD selected stakeholders for the ACP from an area within a radius approximately 20 miles of RAF Marham, which is in line with the engagement catchment area for the airspace trial<sup>7</sup>. A refresh of the stakeholder lists was managed by the Change Sponsor to identify any changes in personnel in organisational posts. All stakeholders previously engaged for the airspace trial have been included in all engagement activity for this ACP. Local communities are expected to see no change to the impact of noise or air pollution due to the implementation of the airspace. As such, it is proposed that individual properties need not be contacted and communities will be reached by methods described at paras 3.2 to 3.5.

3.1.2 In consulting with a wide range of national and regional organisations, the Change Sponsor is expecting them, as over-arching bodies, to consider the information provided in this consultation material and provide feedback on behalf of their stakeholders or members.

### **3.2 Non-Aviation Stakeholders**

3.2.1 A webinar will be hosted by the Change Sponsor, comprising of a presentation on the ACP suitable for non-aviation stakeholders, followed by a Q&A session<sup>8</sup>. RAF Marham press outlets and social media platforms will also be utilised to promulgate the consultation, with focus on encouraging any individual or organisation to submit a response to the consultation.

3.2.2 Local authorities, including county, district and parish councils that represent communities at the local level, all of whom have already been involved in the Stage 1 and Stage 2 engagement, will be contacted as part of the consultation. The inclusion of one relevant Member of Parliament (MP) has been made, from the constituency RAF Marham sits in. One county, two district and six local parish councils have been included on the stakeholder list; the Change Sponsor did not extend the list to a wider reach for local authorities due to the size, location and anticipated utilisation and impact of the proposed airspace. The full list of local authorities, other local area stakeholders and the MP can be found in Appendix A.

### **3.3 Environmental Organisations**

3.3.1 A selection of environmental organisations were engaged with during Stages 1 and 2. They will be invited to provide feedback to the consultation. A list of these organisations can be found in Appendix A.

### **3.4 Aviation Stakeholders**

3.4.1 Aviation stakeholders have already been identified and invited to provide feedback during Stages 1 and 2. The Consultation Communication will be maintained throughout Stage 3 as described in Section 4. The bi-annual EAAUWG is due to take place on the 13 June 2024 which is attended by local aviation stakeholders. An update on the ACP will be provided by the Change Sponsor at the event, to include details of how stakeholders are able to contribute to the consultation. Appendix A lists all Aviation stakeholders.

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<sup>7</sup> All stakeholders identified for the airspace trial (see ACP-2023-047) are included as stakeholders for his ACP.

<sup>8</sup> The webinar will be open to all stakeholders, but tailored towards non-aviation stakeholders

## 4 Approach

### 4.1 Communication approach

4.1.1 The overarching aim of the Change Sponsor is to ensure that all impacted stakeholders are able to suitably participate in the consultation by means of consultation activity that is proportionate to the scale and impact of the ACP.

4.1.2 Notification of consultation will be targeted towards stakeholders identified at Stage 1 and 2 of the ACP, as well as local communities in the vicinity of RAF Marham.

4.1.3 The Change Sponsor has not specifically identified any seldom-heard stakeholder groups, but will use a mixture of methods of communication (online consultation platform, social media, local press) to maximise reach.

4.1.4 Owing to previous engagement activity with stakeholders for the trial (ACP-2023-047) and at Stages 1 and 2 of this proposal, together with the size, location and anticipated utilisation and impact of the proposed airspace, use of specific intermediaries was not considered necessary.

4.1.5 It is proposed that the communication process requires two stages; Launch/Initial Engagement Period and Reminder/Continued Engagement Period. The webinar will take place following a reminder to all stakeholders to submit feedback, thus attempting to ensure all stakeholders are notified of the event and are provided the opportunity to participate.

### 4.2 Launch

4.2.1 The consultation will be launched on 10 June 2024 via direct email, the CAA ACP Portal and local press release.

4.2.2 Promulgation of the launch will consist of the following activities:

- Identified Stakeholders. Those listed in Appendix A will be notified of the launch via email. A record of communication activity with all stakeholders will be maintained throughout the consultation process.
- Press Release. A formal press release and public promotions will occur on 10 June 2024 and 3 Jul 2024, to include RAF Marham local media. Information about the consultation will be promulgated, directing interested parties to the Citizen Space online portal and joining instructions for the webinar; it will also provide details of how to request and submit information for those without internet access.
- Other media coverage. There is thought to be little merit in seeking media reach beyond the local area for this ACP, as it is considered disproportionate to the scale and impact of the ACP.

### 4.3 Webinar

4.3.1 The Change Sponsor will host an online webinar comprising of a presentation on the ACP tailored for stakeholders with a non-aviation background, followed by a Q&A session. This will take place on Thursday 11 July 2024 between 0900 and 1200. Participants are requested to register interest to the email address below.

UASCDC-ACP@qinetiq.com

4.3.2 The session will be open for 3 hours to facilitate flexibility for participants to drop in at a convenient time. The presentation will be delivered hourly at 09.00, 10.00 and 11.00, and will offer a simplified precis of the proposed change and explain the methods by which interested parties

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can submit feedback: stakeholders will not be able to submit feedback through the webinar, but will be encouraged to utilise the Citizen Space online portal.

4.3.3 The event aims to facilitate an opportunity for stakeholders to pose questions and queries on the proposed change or the CAP1616 process only; questions deemed out of scope may not be answered. Stakeholders are invited to send questions in advance to [UASCDC-ACP@qinetiq.com](mailto:UASCDC-ACP@qinetiq.com)

4.3.4 Questions posed by stakeholders attending this event that may be of interest to others, will be added to the living Frequently Asked Questions (FAQ) document after the session. Stakeholders that were unable to pose their questions during the session are encouraged to submit them via the Q&A chat box on the Webinar; by email to the Change Sponsor; or by responding through the feedback form accessible on Citizen Space.

4.3.5 Joining instructions:

To join the meeting via Teams: [click here](#)  
Meeting ID: 364 986 471 595  
Passcode: HLtLZn

To Dial-in by phone:  
Dial: +44 20 3443 8728#  
Phone conference ID: 242 913 365#

4.3.6 To register interest in the Webinar and to send questions in advance please do so via this email address - [UASCDC-ACP@qinetiq.com](mailto:UASCDC-ACP@qinetiq.com)

## 4.4 Citizen Space

4.4.1 To comply with statutory requirements, the ACP-2023-022 Consultation will be presented on the Citizen Space platform from 10 June 2024 [here](#). Appropriate information and documentation will be available to the public to maintain transparency and accountability, and to offer a facility to obtain feedback.

4.4.2 A Feedback Form will be accessible via Citizen Space and will be integral to the feedback process; the template Feedback Form is at Appendix B and will also be uploaded to the CAA ACP Portal.

4.4.3 Frequently Asked Questions (FAQs) document will be uploaded to Citizen Space. It will answer both aviation-specific questions as well as address general themes received during previous engagement.

4.4.4 An 'at a glance' overview will be published, designed to provide a simplified precis of the proposed airspace and anticipated impact for non-aviation stakeholders.

### 4.1 Reminders to stakeholders

4.1.1 To encourage participation, those stakeholders listed in Appendix A yet to respond will be contacted mid-way through the consultation period. A reminder will also be distributed via social media channels.

### 4.2 Postal submissions

4.2.1 Postal feedback can be submitted to the consultation. Additionally, a paper copy of the engagement material, FAQs and Feedback Form will be available on request. Respondents may include a stamped envelope should they require a reply. Postal submissions will be uploaded to the CAA ACP Portal alongside any online responses. Regardless of how the stakeholder

responses have been received, they will be addressed as part of the ACP. The consultation postal address will be provided online within the consultation document and also publicised as part of press release activities.

### 4.3 Response Management

4.3.1 Where pertinent, responses that require a reply during the consultation period will be acknowledged via the same method by which they were received, unless otherwise requested by the respondent. Direct contact with stakeholders/responders will only be made if necessary, by appropriate SMEs.

4.3.2 Progress of the consultation will be reassessed week commencing 17 July 2024. Evaluation of progress and any consequential adaptations will be established through:

- Feedback received from each of the key stakeholder groups identified in Section 2;
- Evidence of local media publicity;
- Webinar session participation;
- Analysis of engagement on Citizen Space.

4.3.3 Should it be considered that stakeholder engagement has been insufficient, or unexpected events affect response submissions, it may be necessary to extend the Consultation Period and conduct additional events, The CAA will be notified and consulted on any significant deviations from the Consultation Strategy instigated by consultation reassessment.

4.3.4 Should a response be received after the consultation period has closed, the Change Sponsor will notify the stakeholder that their feedback is unable to be included for consideration at this stage.

4.3.5 Categorisation of responses will be in accordance with CAP 1616 and uploaded to the CAA ACP Portal.

### 4.4 Summary of the Key Stages of the Consultation Strategy

4.4.1 Table 2 below summarises the key dates and activities for the Consultation Process and will also be included in the Consultation Document.

<i>Table 2: Key dates and activities for the ACP-2023-022 Consultation Process</i>		
<b>Date</b>	<b>Activity</b>	<b>Location</b>
31 May 2024	Stage 3 Consult Gateway	
10 June 2024	Stage 3 Consultation Launch	CAA ACP Portal, email
10 June 2024	Public promotion	Local press, email, social media, etc.
3 July 2024	Reminder to Stakeholders	Email
3 July 2024	Public promotion	Local press, email, social media, etc.
11 July 2024	Webinar	MS Teams
17 July 2024	Reassessment of Consultation	
2 August 2024	Consultation closes	

## **4.5 Materials**

A list of documentation to be presented electronically for stakeholders to digest, with a paper copy made available on request:

## **4.6 Consultation Document**

4.6.1 The main document will be uploaded to the CAA ACP Portal and will provide a comprehensive breakdown of the airspace design options as well as background information on the ACP.

## **4.7 Frequently Asked Questions (FAQ)**

4.7.1 An FAQ document will aim to cover both aviation-specific and general themes raised during previous engagement, together with topics the Change Sponsor considered of possible interest. This will be in the form of a living document and will evolve should additional trends begin to develop with feedback submissions.

## **4.8 'At a Glance' Overview**

4.8.1 An 'At-a-Glance' overview will be published, designed to provide a simplified precis of the proposed airspace and anticipated impact for non-aviation stakeholders. A copy can be found at Appendix C.

## **4.9 Full Options Appraisal**

4.9.1 As part of the Stage 3 gateway the Change Sponsor will produce a Full Options Appraisal. This will be available for consultees to read should they wish to obtain more technical detail.

## **4.10 Feedback Form**

4.10.1 A copy of the consultation feedback form is at Appendix B.

## **4.11 Webinar presentation**

4.11.1 The presentation will be available for stakeholders to view on request, after the briefing session has taken place.

## **4.12 Accessibility**

4.12.1 The Equality Act 2010 requires public bodies to take steps to ensure their engagement mechanisms are accessible to Disabled people. These could include:

- providing consultation materials in alternative formats.
- providing communication support at public meetings.
- holding engagement meetings at accessible venues.
- paying or arranging for support at meetings.

4.12.2 All materials produced as part of the consultation will aim to be as accessible as possible. However, should an audience member require a document in a different format, or would like a reasonable adjustment, they should contact the Change Sponsor, either by email or by post, to make their request.

## 5 Consultation Length

### 5.1 Consultation Period

5.1.1 UK public consultation for ACP-2023-022 will be 8 weeks in duration, commencing 10 June 2024, closing on 2 August 2024. The Change Sponsor felt this was an appropriate period due to engagement already conducted for the trial at RAF Marham<sup>9</sup> and at Stages 1 and 2 of this proposal. Activities will occur during the engagement period to maintain proactive exchange of information and to maximise positive exposure of the proposal.

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<sup>9</sup> Access to RAF Marham as a nominated diversion airfield as early as June 2024 has been managed under an airspace trial (see ACP-2023-047 on the CAA ACP Portal) For more details see here: [Airspace change proposal public view \(caa.co.uk\)](#)



## 6 Post-consultation

### 6.1 Collate and review responses

6.1.1 On completion of consultation the Change Sponsor will review all responses and categorise them for analysis. As with previous engagement, feedback responses will be categorised into responses directly relating to the ACP and more general feedback that does not.

6.1.2 All original responses will be analysed and sent to the CAA with a redacted version uploaded to the CAA ACP Portal (including raw data).

### 6.2 Stage 4 – Update and Submit

6.2.1 The Change Sponsor will consider whether, in light of feedback received during consultation, the airspace design options need significant re-design that would warrant further consultation with stakeholders.

6.2.2 Provided additional consultation is not required the Sponsor will begin to draft the final submission to the CAA as part of ACP Stage 4. Table 3 below summarises the next steps after consultation has closed.

<i>Table 3 - Post-Consultation steps for ACP-2023-022</i>		
Date	Activity	Detail
2 August 2024	Stage 3 Consultation Ends	No further feedback will be considered after this date
5 September 2024	Stage 3 Collate & Review	Feedback document uploaded to the CAA ACP Portal
20 September 2024	Stage 4 - Update and Submit	Upload ACP final submission to the CAA ACP Portal
13 January 2025	Stage 5 - Decide	CAA decision
17 April 2025	Stage 6 - Implement	Airspace implemented
12 months post-implementation	Stage 7 – Post Implementation Review	Assessment of the effectiveness and usage of any implemented airspace

**Appendix A – ACP-2023-022 Stakeholder List**

NATMAC Members			
Serial	Organisation	Representative/s	Email Contact
N1	Airlines UK	[REDACTED]	[REDACTED]
N2	Airport Operators Association (AOA)	[REDACTED]	[REDACTED]
N3	Airfield Operators Group (AOG)	[REDACTED]	[REDACTED]
N4	Aircraft Owners and Pilots Association (AOPA)	[REDACTED]	[REDACTED]
N5	Airspace Change Organising Group (ACOG)	[REDACTED]	[REDACTED]
N6	Association of Remotely Piloted Aircraft Systems UK (ARPAS-UK)	[REDACTED]	[REDACTED]
N7	Aviation Environment Federation (AEF)	[REDACTED]	[REDACTED]
N8	British Airways (BA)	[REDACTED]	[REDACTED]
N9	BAe Systems	[REDACTED]	[REDACTED]
N10	British Airline Pilots Association (BALPA)	[REDACTED]	[REDACTED]
N11	British Balloon and Airship Club	[REDACTED]	[REDACTED]
N12	British Business and General Aviation Association (BBGA)	[REDACTED]	[REDACTED]
N13	British Gliding Association (BGA)	[REDACTED]	[REDACTED]
N14	British Helicopter Association (BHA)	[REDACTED]	[REDACTED]
N15	British Microlight Aircraft Association (BMAA)	[REDACTED]	[REDACTED]
N16	British Skydiving	[REDACTED]	[REDACTED]
N17	Drone Major	[REDACTED]	[REDACTED]
N18	General Aviation Alliance (GAA)	[REDACTED]	[REDACTED]
N19	Guild of Air Traffic Control Officers (GATCO)	[REDACTED]	[REDACTED]
N20	Honourable Company of Air Pilots (HCAP)	[REDACTED]	[REDACTED]
N21	Helicopter Club of Great Britain (HCGB)	[REDACTED]	[REDACTED]
N22	Isle of Man CAA	[REDACTED]	[REDACTED]
N23	Light Aircraft Association (LAA)	[REDACTED]	[REDACTED]
N24	Low Fare Airlines	[REDACTED]	[REDACTED]

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N25	Military Aviation Authority (MAA)	[REDACTED]	[REDACTED]
N26	Ministry of Defence - Defence Airspace and Air Traffic Management (MoD DAATM)	[REDACTED]	[REDACTED]
N27	NATS	[REDACTED]	[REDACTED]
N28	Navy Command HQ	[REDACTED]	[REDACTED]
N29	PPL/IR (Europe)	[REDACTED]	[REDACTED]
N30	UK Airprox Board (UKAB)	[REDACTED]	[REDACTED]
N31	UK Flight Safety Committee (UKFSC)	[REDACTED]	[REDACTED]
N32	United States Visiting Forces (USVF), HQ United States Country Rep-UK (HQ USCR-UK).	[REDACTED]	[REDACTED]

Local Authority Stakeholders			
Serial	Name/Organisation	Rep	Contact Details
A1	Norfolk County Council	Planning Dept Chair	[REDACTED]
A2	Kings Lynn and West Norfolk District Council	Airfield Wards	[REDACTED]
A3	Breckland District Council		[REDACTED]
A4	Marham Parish Council		[REDACTED]
A5	Boughton Parish Council		[REDACTED]
A6	MP for SW Norfolk	[REDACTED]	[REDACTED]
A7	Barton Bendish Parish Council		[REDACTED]
A8	Shouldham Parish Council		[REDACTED]
A9	Fincham Parish Council		[REDACTED]
A10	Narborough Parish Council		[REDACTED]
A11	The Wash and North Norfolk Marine Partnership	[REDACTED]	[REDACTED]
A12	Environment Agency		[REDACTED]
A13	Natural England		[REDACTED]
A14	County Land and Business Association		[REDACTED]
A15	Campaign to Protect Rural England (CPRE)		[REDACTED]

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A16	County Land and Business Association		
A17	Campaign to Protect Rural England (CPRE)		
A18	Police and Crime Commissioner for Norfolk		
A19	Wash & Norfolk Conservation		
A20	Shouldham Parish Council <sup>10</sup>	-	

Local Aviation Stakeholders			
Serial	Name/Organisation	Representative	Contact Details
L1		Cambridge Airport	
L2		Airprox Board	
L3		Boughton North	
L4		Boughton South	
L5			
L6			
L7			
L8			
L9			
L10			
L11			
L12		Cambridge Airport	
L13			
L14			
L15		Cambridge Gliding	
L16			
L17		Chatteris	
L18			
L19		Drone Trg	
L20			
L21		Duxford	
L22		East Anglia Air Ambulance	
L23			
L24			
L25			
L26		East Winch	
L27			
L28			
L29			
L30		Felthorpe Airfield	
L31			
L32			
L33			
L34		Fenland Airfield	
L35		Fenland Flying School	
L36		Ferfield Airfield	

<sup>10</sup> This stakeholder was noticed as a duplication of stakeholder #A8 and has been removed.

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L37	[REDACTED]	Fersfield Flying Club	[REDACTED]
L38	[REDACTED]	Fersfield Flying Group	[REDACTED]
L39	[REDACTED]	GasCo	[REDACTED]
L40	[REDACTED]	Ludham Airfield	[REDACTED]
L41	[REDACTED]		[REDACTED]
L42	[REDACTED]	Mcaully Flying Group	[REDACTED]
L43	[REDACTED]	Norfolk Gliding Club	[REDACTED]
L44	[REDACTED]	Norwich Aiport	[REDACTED]
L45	[REDACTED]		[REDACTED]
L46	[REDACTED]		[REDACTED]
L47	[REDACTED]		[REDACTED]
L48	[REDACTED]		[REDACTED]
L49	[REDACTED]	Old Buckenham Airfield	[REDACTED]
L50	[REDACTED]	Osprey	[REDACTED]k
L51	[REDACTED]	priory Farm Tibenham	[REDACTED]
L52	[REDACTED]		[REDACTED]
L53	[REDACTED]		[REDACTED]
L54	[REDACTED]		[REDACTED]
L55	[REDACTED]		[REDACTED]
L56	[REDACTED]	Seething	[REDACTED]
L57	[REDACTED]	UAV Norwich Police	[REDACTED]

Other Aviation Stakeholders		
Serial	Name/Organisation	Contact Details
O1	Helicentre Aviation (Pipeline Inspection)	[REDACTED]
O2	Heli Air (Pipeline inspection)	[REDACTED]
O3	PDG Helicopters	[REDACTED]
O4	National Grid (Powerline inspection)	[REDACTED]
O5	Drone Wars - [REDACTED]	[REDACTED]
O6	Fly Cromer	[REDACTED]

## Appendix B – Consultation Feedback Form

The following is the print copy of the online Consultation Feedback Form that will be distributed to stakeholders on request.

### **ACP-2023-022 - RPAS Operations to/from a nominated diversion airfield**

#### **Overview**

*The aim of this consultation is to seek stakeholder views on the introduction of a change in designation of airspace in the vicinity of RAF Marham.*

*The main operating base (MOB) for the large Remotely Piloted Air System (RPAS), Protector RG Mk1 is RAF Waddington, where permanent segregated airspace in the form of a danger area has already been established. The danger area is EG D324A/B, which was implemented at the end of November 2023. Under current timescales routine Protector operations is likely to commence from RAF Waddington in Summer 2024 when the MOD will conduct test and evaluation activities prior to Protector formally entering into service. During this, and for future activity in the UK, Protector will require a nominated permanent diversion airfield to be made available in the event that, for any unforeseen reason, RAF Waddington becomes unavailable. Following investigation into several military airfields, RAF Marham has been identified as the most suitable and preferred diversion airfield. Whilst Protector's MOB remains RAF Waddington there may be occasions when access to RAF Marham is required for operational reasons. The purpose of this consultation is for all stakeholders to respond effectively to the information provided. The Feedback Form will assist in gathering and considering opinions and information from relevant stakeholders regarding the potential impact of this ACP.*

*The methodology of this consultation is summarised in the Consultation Strategy, which can be read in conjunction with the Consultation Document and the Full Options Appraisal.*

*The consultation period is from 10 June to 2 August 2024. Once consultation has ended, all feedback will be considered for the final design proposal. The final design proposal may evolve from that described in the Consultation Document, subject to stakeholder input.*

**ACP-2023-022 - RPAS Operations to/from a nominated diversion airfield**  
*\*Questions marked are required.*

**Name\***

**Postcode\***

*Most relevant to your response e.g. home/work/organisation*

**Email  
Address**

*If you enter an email address you will receive an acknowledgement email*

**Are you responding as an individual or do you represent an organisation? \* (Please select one)**

Individual

Organisation

**If you are responding on behalf of an organisation, what is the organisation's name?**

**If you are responding on behalf of an organisation, what is your position/ title?**

**What best describes your association with this airspace change proposal? \* (Please select one)**

Aviation  
Stakeholder

Local Authority  
Stakeholder

NATMAC  
Organisation

None of the  
above

**In accordance with the UK Civil Aviation Authority's (CAA) CAP 1616 (Airspace Design), consultation responses will be published on Citizen Space<sup>11</sup> via the CAA Airspace Change Portal. Responses will be subject to moderation by the Change Sponsor. If you wish your response to be published anonymously, please indicate below and your personal details (Name, Address & Position) will be redacted and only be seen by the CAA.\***

*Please select only one*

Publish Response

Publish Response Anonymously

**Do you support the proposed Airspace Change Proposal?\***

<sup>11</sup> <https://consultations.airspacechange.co.uk>

Yes

No

Unsure

**If you have any, please provide feedback on the following themes:**

<p><b>Access</b> (entering, exiting or transiting through the airspace)</p> <p><i>More information can be found at: ACP-2023-022 Stage 3 – Consultation Document, paragraphs 3.1.2; 4.1.3, 5.1.2</i></p>	
<p><b>Proposed level of the internal division of the airspace</b></p> <p><i>More information can be found at: ACP-2023-022 Stage 3 – Consultation Document, Figure 5 and paragraphs 3.1.1 and 3.1.2</i></p>	
<p><b>Size/dimensions of the airspace proposed</b></p> <p><i>More information can be found at: ACP-2023-022 Stage 3 – consultation Document, Figure 5, Section 3 and paragraphs 3.1.1 and 3.1.2; Full Options Appraisal Section 3</i></p>	



<p><b>Proposed management &amp; Notification of the active airspace</b></p> <p><i>More information can be found at: ACP-2023-022 Stage 3 – Consultation Document, Section 4</i></p>	
<p>Other</p>	

**Do you require a response?**

Yes

No

If so, how would you like to be contacted? *Please select only one*

Email

Post

If you would like to be contacted by post, please provide your postal address and include a stamped envelope

Your contact information will be used for the purposes of communication regarding this ACP ONLY

## Appendix C – ACP-2023-022 – AT A GLANCE



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# ACP-2023-022

At-a-glance



**Protector RG Mk1 is a Remotely Piloted Air System (RPAS). It is being brought into Service by the Ministry of Defence in 2025**

### Definition of RPAS:

Any aircraft operating or designed to operate autonomously or to be piloted remotely without a pilot on board. RPAS can also be referred to as UAS, UAV or 'drones'. It can fly, navigate and communicate like any other aircraft



Its home base is RAF Waddington, Lincolnshire, and the aircraft requires a nominated permanent diversion airfield in case it cannot return to its home base.

The nominated diversion airfield is  
**RAF Marham, Norfolk**



**Why Marham?** The MOD conducted a scoping exercise to determine suitable locations for diversion of Protector. A total of 32 MOD airfields were assessed against a set of requirements. Analysis concluded that RAF Marham was the most suitable diversion airfield



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## ACP-2023-022

At-a-glance



**Protector Stats:** Protector has a 79 ft wingspan and is 38 ft long. It is powered by a single TPE 331-10 turbo-prop engine and will be operated by fully qualified RAF crews



RPAS activity is highly regulated in the UK and when Protector enters Service it will have limitations on which parts of the national airspace structure it can operate within. As RAF Marham sits in uncontrolled airspace, a volume of **Segregated Airspace** is required for Protector to be able to access it

### Definition of **Segregated Airspace**:

Airspace of specified dimensions allocated for exclusive use to a specific user(s)

**Airspace Change Proposal (ACP) 2023-022** aims to establish suitable airspace that will enable Protector to access RAF Marham, whilst keeping it safely segregated from other aircraft operating in the vicinity



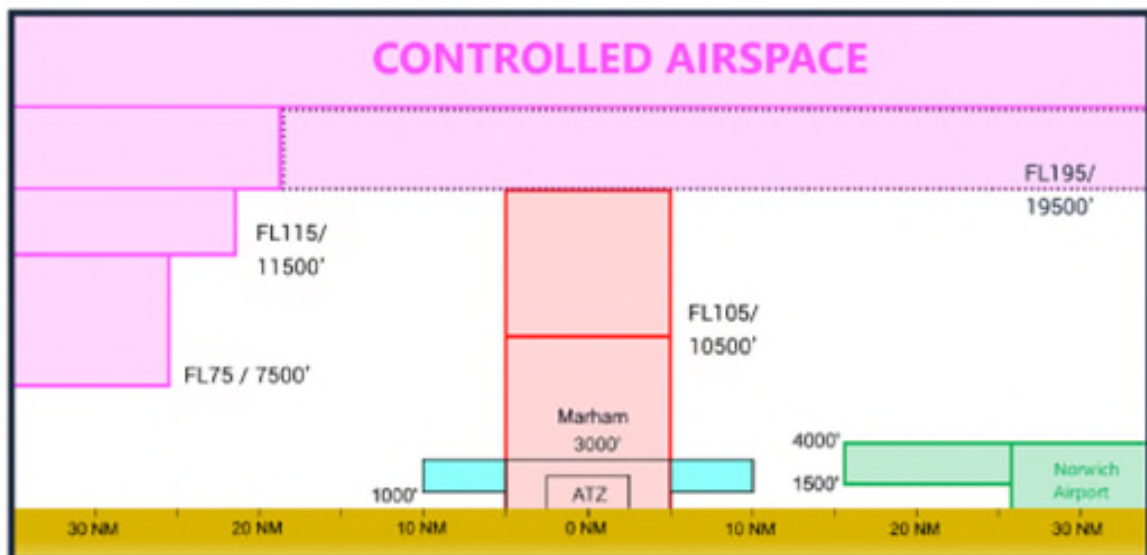
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# ACP-2023-022

Airspace Design

The proposed airspace is a 5nm (nautical mile) radius cylinder, from the ground to the bottom of the Controlled Airspace at FL195 (19500ft). The airspace is divided at FL105 (10500ft). This allows users to access the portion of the cylinder that isn't in use by Protector






Cross section of airspace above RAF Marham with proposed additional airspace in red



The airspace is only in force when required by Protector, and is activated and de-activated by **NOTAM**. When active, other airspace users can still access the airspace - when it is not in use or shortly to be used by Protector - by means of a Special Use Airspace Crossing Service (SUACS) from Air Traffic Control

### Definition of **NOTAM**:

A notice distributed by means of telecommunication containing information ... the timely knowledge of which is essential to personnel concerned with flight operations

<p><b>Frequency of Use</b></p> 	<p>It is anticipated that when Protector enters service, the airspace would be activated up to 3 times per week, Monday - Friday only. Actual flying by Protector into RAF Marham would be much less frequent.</p>
<p><b>Noise</b></p> 	<p>Protector's engine is similar to that of other small light aircraft that already frequently visit RAF Marham, so there isn't expected to be any increase in noise.</p>
<p><b>Emissions</b></p> 	<p>Protector is only estimated to spend 6% of its time below 3000ft, the height above which emissions have little or no effect on air quality. In most aspects, Protector's engine produced approximately 40% less emissions in comparison to a large SUV.</p>
<p><b>Infrastructure</b></p> 	<p>No new infrastructure will be required, nor is there any expected increase in personnel requirements at RAF Marham.</p>
<p><b>Privacy</b></p> 	<p>The MOD is bounded by the Data Protection Act 2018 and, therefore, any data gained by the operation of Protector's sensors will be dealt with in an appropriate manner.</p>



# ACP-2023-022

Further Information



ACP Key Dates	
13 January 2025	CAA decision on airspace
17 April 2025	Airspace implementation



All materials produced as part of the consultation will aim to be as accessible as possible. However, should an audience member require a document in a different format, or would like a reasonable adjustment, they should contact the Change Sponsor, either by email or by post, to make their request.



Where can I find out more information?

More detailed documentation is available on the Civil Aviation Authority's Airspace Change Portal. This can be found at [airspacechange.caa.co.uk](https://airspacechange.caa.co.uk) and searching for ACP-2023-022

or



Email [UASCDC-ACP@Qinetiq.com](mailto:UASCDC-ACP@Qinetiq.com)