



Ministry
of Defence

Headquarters Air Command

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AIRSPACE CHANGE PROPOSAL – ACP-2024-014

Introduction

This document forms part of the Airspace Change Proposal (ACP) process as defined in Civil Airspace Publication (CAP) 1616. The purpose of the proposed change is to establish temporary segregated airspace in the form of a Temporary Danger Area (TDA) adjacent to EGD207 Holbeach Air Weapons Range (AWR). The airspace will facilitate activity related to the large RPAS¹, Protector, which is due to enter into Service in 2025. It will also inform the development of ACP-2024-028², which is at the first stage of the CAP 1616 process and seeks to establish permanent segregated airspace in the vicinity of EGD207 to support longer term activities for the Protector capability (please see section at the end of this document entitled *ACP-2024-028 Forthcoming Engagement* for further information)

The aim of this letter is to inform all stakeholders of the proposed introduction of the TDA at Holbeach AWR and to ensure that everyone has a full understanding of what, if any, effect it may have on them. This letter forms part of the ACP engagement activity and is being sent to you as an identified stakeholder for comment. The Change Sponsor is the Ministry of Defence (MOD); QinetiQ Ltd is managing the ACP on behalf of the MOD.



Protector has a 79ft wingspan and is 38ft long. It is powered by a single TPE 331-10 turbo-prop engine and will be certified to fly in UK airspace. The aircraft will be operated by fully qualified RAF crews.

Protector pictured left at RAF Waddington – MOD library photograph 2023

TDA Requirement

This proposal aims to introduce a volume of segregated airspace adjacent to and potentially overlapping the airspace currently designated as EGD207 Holbeach AWR. This additional airspace, in the form of a TDA will effectively increase the segregated airspace around EGD207 enabling Protector to safely conduct essential trials, data collection and procedures development activity (see section below entitled *Establishment of the Proposed TDA*) prior to Protector formally entering into Service. The activity requires access to a specific ground-

¹ICAO defines RPAS as follows: Remotely piloted aircraft system (RPAS). A remotely piloted aircraft, its associated remote pilot station(s), the required command and control links and any other components as specified in the type design

² [Airspace change proposal public view \(caa.co.uk\)](https://www.caa.co.uk/airspace-change-proposal-public-view)

based target which, within the UK, is only located within two existing Danger Areas (DA). Owing to its geographical location, EGD207 is the preferred option for these activities.

When Protector enters into Service in 2025, it will be equipped with a limited Detect and Avoid (DAA) capability only. In accordance with current regulation, its operation must be conducted within segregated airspace (see section below entitled *Regulatory Requirement and Safety Assessment*). The MOD has assessed that the flight profiles to carry out the trials, data collection and procedures development activity cannot be wholly contained within the current lateral boundary of EGD207 and, therefore, additional segregated airspace is required. The additional airspace will only be activated for periods when Protector is required to conduct the specific activities listed above.

Statement of Need

The formal Statement of Need is provided on the CAA ACP portal as linked [here](#).³

Regulatory Requirement and Safety Assessment

This section describes why segregated airspace in the form of a TDA is being proposed for the Protector activity in the vicinity of EDG207.

UK military aviation is regulated by the Military Aviation Authority (MAA). Accordingly, the Protector programme is subject to the MAA Regulatory Publications (MRP). Of particular relevance to the operation of Protector in UK airspace is MAA Regulatory Article (RA) 2320 – MAA regulation for operation of military RPAS. The RA states the criteria for beyond visual line of sight (BVLOS⁴) RPAS operation such that within UK airspace, BVLOS operations should:

- *Either* employ an appropriately approved DAA capability to enable compliance with the Rules of the Air appropriate to the class of airspace,
- *or* be flown using a Layered Safety Approach that specifically requires flight in segregated airspace.

Protector will be fitted with a limited DAA capability only and, since the proposed TDA sits entirely within Class G airspace, flight in segregated airspace is required to enable Protector to complete these activities in a safe environment, maintain regulatory compliance, and provide protection of other airspace users of any associated and identified hazardous activities.

Establishment of the Proposed TDA

The MOD has prepared two airspace design options in the vicinity of EGD207. Responses from stakeholders on how they perceive the suitability of these options and their preferences are invited. The proposed airspace will provide the additional required volume of segregated airspace to enable Protector to conduct key activity. The airspace will be used as follows:

- It will be activated during Phase 5 of the MOD's trials campaign, Trial PREVALENT PHOENIX;
- Using a fixed ground installation within Holbeach AWR, data collection profiles will be conducted in order to inform, understand and test the accuracy of one of Protector's onboard systems⁵;

³ <https://airspacechange.caa.co.uk/PublicProposalArea?pID=637>

⁴ 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.

⁵ the Multispectral Targeting System sensors and laser for targeting

- To inform the development and validation of procedures for tactical employment of the aircraft and its sensors to maximise their efficiency and effectiveness⁶.

The two proposed airspace design options are shown at Figure 1 and Figure 2 below. They have been developed using the latest source material⁷.

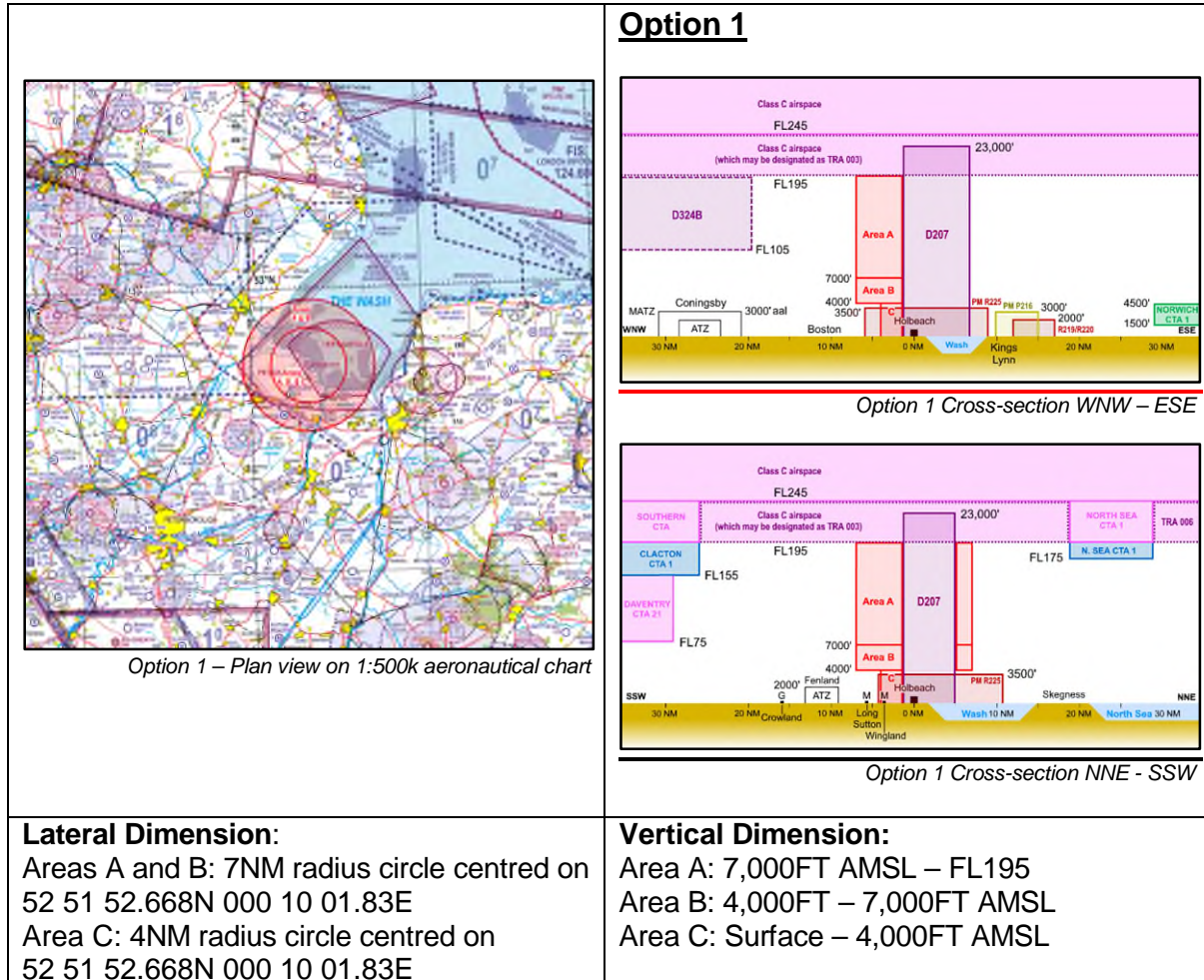


Figure 1 - Airspace Design Option 1

⁶ Development specifically of Intelligence, Surveillance & Reconnaissance (ISR) Standard Operating Procedures (SOP) and Tactics, Techniques & Procedures (TTP)

⁷ Topographical Air Chart of the United Kingdom 1:250,000"-Sheet 6, England East, Edition 16, 3 Jul 2023; Aeronautical Chart ICAO 1:500,000"-Sheet 2171CD Southern England and Wales, Edition 50, 21 March 2024; Military AIP, 11 Jul 24 to 08 Aug 24 (AIRAC Cycle 0724).

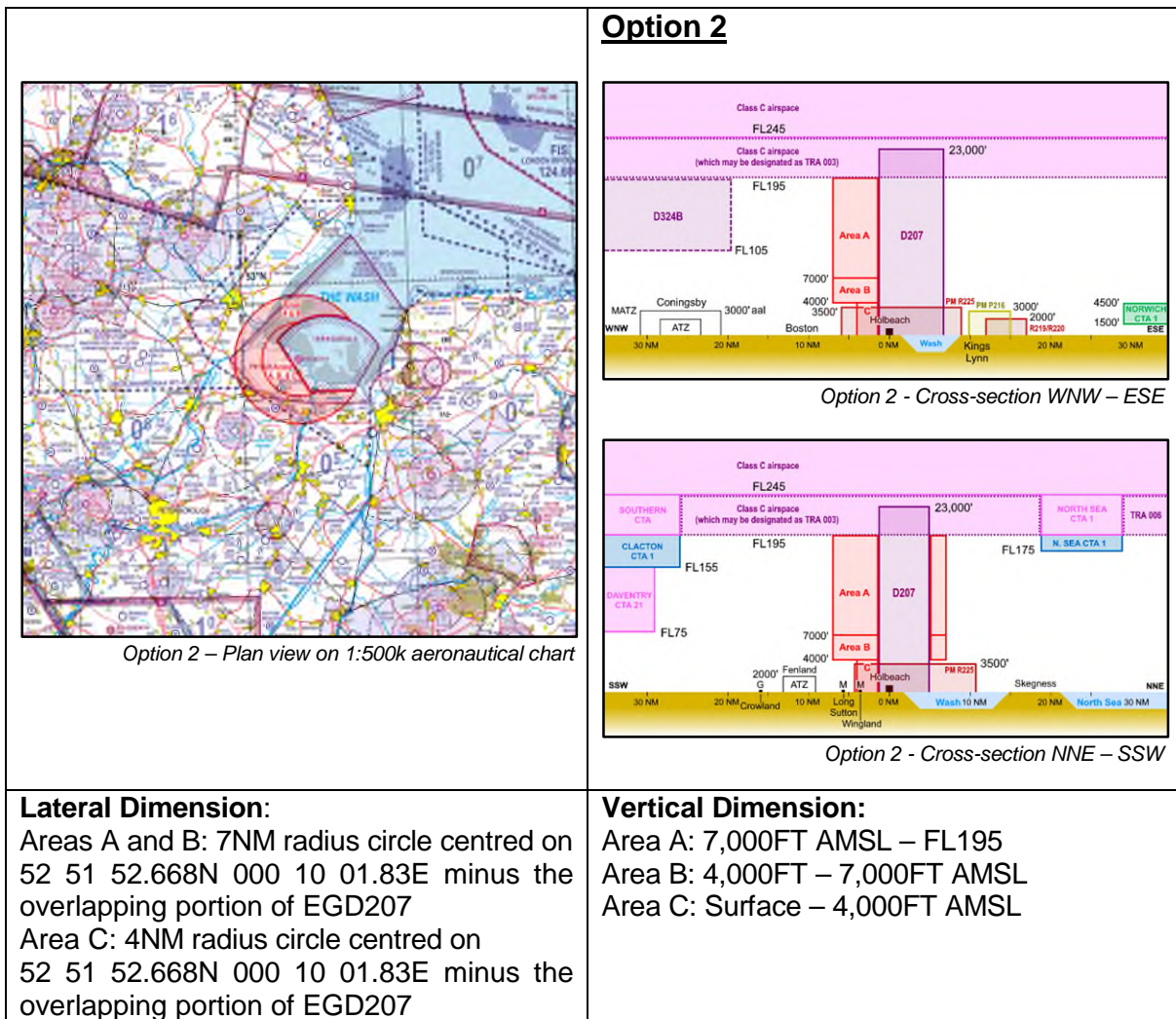


Figure 2 - Airspace Design Option 2

Protector will enter Options 1 and 2 airspace from Class C airspace above and will remain within the TDA at all times until its activity is complete, after which it will climb to enter Class C airspace above and continue en route.

Measures to Minimise the Impact on other Airspace Users

General

The proposed TDA will be activated only when Protector is required to conduct essential trials, data collection and procedures development activity as described earlier. EGD207 will be activated simultaneously. The TDA will be activated by NOTAM⁸ at D-1⁹. To ensure minimum disruption to other airspace users a Special Use Airspace Crossing Service (SUACS) will be offered within the TDA by Holbeach Range ATC. Therefore, even if the airspace has been notified as being active, it may be possible for both civil and military aircraft to transit through it under a clearance from Holbeach Range ATC.

⁸ A **Notice to Aviation (NOTAM)**, is a notice containing information concerning the establishment, condition or change in any aeronautical facility, service, procedure or hazard, the timely knowledge of which is essential to personnel concerned with flight operations. In this instance it is a flexible means of switching on and off the airspace concerned.

⁹ D-1 means that the NOTAM must be requested the day before the airspace is to be activated.

Safety

Holbeach Range ATC will be present at all times during Protector operations and Protector will be under positive ATC control from a military ATC terminal or area radar unit. Protector will be equipped with a transponder and will squawk as directed by ATC. Information on the status of the airspace will be available including a SUACS from Holbeach Range ATC, with both UHF and VHF frequencies available. In addition, a Special Use Airspace Activity Information Service (SUA AIS) may be available from London Information. Full details of how to obtain information on the status of the TDA will be provided in the activation NOTAM.

Utilisation

Protector will conduct up to eight planned sorties during Spring/Summer 2025; each sortie is estimated to be up to 4.5 hrs in duration. Since the TDA is split into 3 areas, it is possible for each area to be activated separately. The majority of the activity will be conducted in Area A, in which case Areas B and C may not need to be activated simultaneously. However, in order to use the full capability¹⁰ associated with the Multispectral Targeting System, Areas B and C will be activated in addition to Area A to comply with safety regulations. Of the eight planned sorties it is thought that at least four will require activation of all 3 areas. Where possible the Protector activity will coincide with EGD207's notified core hours¹¹. In the event that the TDA is required outside routine Holbeach AWR hours, this will be managed via existing internal MOD planning procedures and notified by NOTAM.

Impact Assessment

In accordance with CAP 1616G¹², the Change Sponsor has provided a precis of the current-day scenario, together with applicable impact assessments. This document aims to inform stakeholders on the existing situation and assist in consideration of the potential effect of the proposed airspace change by evaluating the design options against the current-day scenarios. The document has been attached to the initial stakeholder engagement email and can also be found on the CAA ACP Portal here: [Current Day Scenario and Impact Assessments document](#).

ACP-2024-028 Forthcoming Engagement

The MOD has commenced a further airspace change with the ACP identification of ACP-2024-028. This will propose permanent segregated airspace in the vicinity of EGD207 Holbeach AWR. The airspace structure is likely to be very similar, if not identical, to the airspace proposed in this engagement letter for ACP-2024-014. We mention it here to pre-warn you that your feedback will be invited for a second time in the very near future, but the second approach will be for the permanent change. The MOD will endeavour to make it clear on which proposal your feedback is being sought.

How to Provide Feedback

The MOD welcomes comments and feedback from all interested parties. All comments received regarding this proposal for a temporary airspace change will be taken into consideration before a final design is submitted to the CAA. All the details of this airspace change proposal are available on the CAA's Airspace Change Portal here: [Airspace change](#)

¹⁰ Use of Multispectral Targeting System D Combat Laser which is not eye-safe

¹¹ Hours as notified in UK AIP: Mon – Thu 0900 – 1700 (0800 – 1600), Fri 0900 – 1200 (0800 – 1100), September –April inclusive Tue, Thu 1700 – 2200 (1600 – 2100); and as activated by NOTAM

¹² Guidance on Airspace Change Process for Temporary and Trial Airspace Change Proposals (caa.co.uk)

[proposal public view \(caa.co.uk\)](#). Feedback on the proposed change and what is important to you should be sent to:

The Airspace Change Manager at AirspaceChange2@qinetiq.com

A feedback form is provided on the next page. Alternatively, a Word document is attached to the email containing this material for your use.

In consideration of commencing this engagement during a peak holiday season the Change Sponsor has elected to run this engagement for a duration of 7 weeks. Therefore, Stakeholders are requested to return any feedback by 23 September 2024.

Responses regarding the proposed TDA must be received by 23 September 2024

Late responses may be considered for inclusion in the final submission to the CAA (anticipated no later than 8 November 2024) but the Change Sponsor cannot guarantee this.

ACP-2024-014 Response Form

Name	
Representing	
Address (including postcode if possible)	
Feedback:	