

ACP-2023-022 – Categorisation Rationale V1.0 – Redacted

Name	Individual or Organisation	Organisation Name	Association with ACP	Support ACP	If you have any, please provide feedback on the following themes:					Does Not Affect ACP	May Affect ACP		Justification (You said, we did)
					Access	Level of internal division	Size / dimensions	Management / Notification	Other		Has Impacted	Has not Impacted	
[REDACTED]	I		None of these	Yes						X			Support with no further comment
[REDACTED]	I		None of these	Yes						X			Support with no further comment.
[REDACTED]	I		None of these	Yes						X			Support with no further comment.
	I		None of these	Yes						X			Support with no further comment.
[REDACTED]	O	[REDACTED]	Aviation	Not Sure	Require more info	Require more info	Require more info	Require more info	How is more information found on the internet??			X	The feedback highlighted that the link to the documentation accompanying the consultation was not clear. The Change Sponsor addressed this by amending the introductory text on Citizen Space to provide more understandable guidance, together with sending a direct email to the stakeholder containing a link to the CAA Portal. The stakeholder did not offer subsequent feedback.
[REDACTED]	O	[REDACTED]	Local Authority	Not Sure					Nothing further to contribute	X			Did not indicate support but added no comment.
[REDACTED]	O	[REDACTED]	None of these	Not Sure					No further Comments	X			Did not indicate support but added no comment.
[REDACTED]	O	[REDACTED]	None of these	Not Sure					No further comment	X			Did not indicate support but added no comment.
[REDACTED]	I		None of these	Yes					UK must prepare to defend the Country by any means at its disposal. Adding a suitable diversion airfield is an absolute must. Drones and un-maned aircraft are the way forward.	X			Support with no suggestions.

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	O		NATMAC	Not Sure	Nil	Nil	Nil	Nil	The sponsor is required to consider a segregated airspace option for this type of activity due to current CAA (Civil Aviation Authority) regulations and policy. This contradicts the intent of the UK Airspace Modernisation Strategy (AMS) which promotes integration. The proliferation of additional SUA structures, as a result, comes with disbenefits to the wider network and undermines sustainability ambitions. A lack of Detect and Avoid (DAA) capability restricts any other solution outside of Controlled Airspace (CAS) (based on the MOD's approval to fly Protector in CAS).	X			This comment was also submitted by stakeholder at Stage 2, where it was categorised as out of scope for the ACP ( para 3.9 of Airspace Change Design Options and Design Principles Evaluation).
									<b>Feedback from Stage 2:</b> An AMS objective is the implementation of Free Route Airspace to as low a level as is possible. NERL would consider this viable at FL195+ and intend to implement this in the future. The establishment of additional SUAs potentially undermines the efficacy of this capability and the associated benefits to operators in the vicinity e.g. Norwich Airport operations.			X	The design principle Design Principle 3 'The airspace design should endeavour to maximise accessibility for other airspace users' was afforded joint 4th priority in Stage 1 of the ACP and the Change Sponsor is committed to make most efficient use of the proposed segregated airspace. Information on the mechanisms to be in place to minimise the impact on other airspace users was provided at Stage 2 (para 3.5 of Airspace Change Design Options and Design Principles Evaluation) and at Stage 3 within the Consultation material (para 4.1 of the Consultation Document). The stakeholder did not submit further comment on this feedback during Consultation.
	O		Aviation	Yes						X			Support with no further comment.

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	O		NATMAC	Yes	As per the comments at Stage 2, the main concern of military airspace users is that they require access to Marham for normal Station flying (Marham- based traffic), diversions, PDs and other routine training, as well as general handling and other combat related manoeuvres in the airspace above Marham. Agreements will be require to ensure that access will be restricted only for the absolute minimum amount of time when Protector requires to land/take-off. Procedures will also need to accommodate other aircraft using the lower portion when Protector holding above, thus reducing impact further.							X	Design Principle 3 ' The airspace design should endeavour to maximise accessibility for other airspace users' was afforded joint 4th priority in Stage 1 of the ACP and the Change Sponsor is committed to make most efficient use of the proposed segregated airspace. Information on the mechanisms to be in place to minimise the impact on other airspace users was provided at Stage 2 ( para 3.5 of Airspace Change Design Options and Design Principles Evaluation) and at Stage 3 within the Consultation material (para 4.1 of the Consultation Document). Procedures to enable the maximum flexibility in airspace usage are already established for the trial airspace and are expected to be upheld for this ACP, with restrictions only required during periods that PTR is actually within the DA. When MOD air systems and PTR are required to operate within the same portion of airspace, restrictions only require deconfliction agreements and still allow operations, i.e. departures and recoveries. Copies of procedures and LOAs will be included with the ACP at Stage 4.
					The area is used intensively by military traffic and the new airspace will increase the controller workload due to the monitoring of aircraft in relation to the Danger Area, along with any additional liaison calls to coordinate access. However, it should be workable as long as access is permitted when the airspace is active but not actually required for Protector; in those circumstances, flexible arrangements are essential to minimise the impact on airspace users. Unrestricted/easy access at these times would be required for aircraft receiving a service from Swanwick Mil and other Mil ATC agencies.							X	Procedures to enable the maximum flexibility in airspace usage whilst minimising ATC workload are already established for the trial airspace and are expected to be upheld for this ACP. Copies of procedures and LOAs will be included with the ACP at Stage 4.

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					Higher than FL105 would be preferable, to accommodate Practice Flame Out (PFO) procedures for Station-based aircraft, when Protector is in the higher section.						X		This comment was also submitted by stakeholder at Stage 2. The level of the vertical separation has been designated at FL105, taking into account the needs of all airspace users. Other suggestions (at Stage 2) were for the split to be lower for GA traffic. 2 Gp BM Safety confirmed accommodation of the PFO procedures can be achieved irrespective of the A/B FL105 split, through tactical ATC management, when PTR is established in the climb and through FL115, PFOs can be approved to utilise SFC to FL105. This will be captured in RAF Marham ATC Procedures. The airspace trial under ACP-2023-047 will collect data to determine most effective level for vertical separation of the DA. Should the airspace trial demonstrate FL105 is not the most effective level for vertical separation within the DA, a review may be conducted. However, it should be noted that due to ongoing modifications to the Trial Plan, the data may not be available prior to submission of this ACP. It should also be noted that Protector may be fitted with the full suite of DAA equipment in the long-term, thus potentially enabling a reduction to the upper limit of the airspace and removing the requirement for two separate internal sections.
					Apart from reasons of routine air traffic safety and co-ordination, aircraft would only be prevented from accessing either area when Protector is in (or about to enter) either section' – Does Minimum Fuel constitute emergency to give Ltng suitable priority?					X			The prioritisation of minimum fuel recoveries would be accommodated in accordance with routine procedure whereby the most expeditious recovery is provided by the relevant ATS provider. The holding fuel capability of Protector enables prioritisation of minimum fuel recoveries ahead of it. Prioritisation for fuel priority does not affect the final airspace design.
					Aircraft would only be prevented from accessing either area when Protector is in (or about to enter) either section' – What defines about to enter? Suggest no more than 5 mins would be an appropriate amount.					X			It would be inefficient to predefine a specific time period that Protector is considered 'about to enter' the airspace as this is variable, dependent on the priority/performance/intentions of all air systems involved. This does not affect the final airspace design.

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									Protector will occupy the entirety of the airspace construct for a maximum of approximately 20 minutes during each arrival or departure phase." – Does this include the time taken to exit the landing surface? While outside of the scope of airspace itself, this is a key factor to consider. Experience of flying at a USAF airfield which integrates UAS ops routinely has shown the biggest limfac is that the aircraft sits on the runway for a period after landing.	X			20 mins does not take into account the time taken to exit the runway, only the descent and Automatic Take off and Landing pattern to touchdown. The air system will remain on the runway for a maximum of 5 minutes (assuming no issues or malfunctions have occurred). Similarly, for take-off, the air system will be stationary on the runway for a maximum of 5 mins. However, the frequency of movements at MRM means this is likely to have limited impact and can be managed with PTR held off to enable either recoveries or departures. The period for entry/exit of the runway does not affect the final airspace design.
									Will Waddington accept Typhoon as an alternate (diversion) when Protector is planned to operate / fly? Will Marham accept Typhoon and Protector as an alternate at the same time? The perceived effect of this proposal would be minimal if the answers to the 2 questions above have no impact on Typhoon alternate booking. If Protector flying denies the use of WAD/MAR during normal working day as an alternate, then it would have a significant increase on Typhoon fuel carriage requirements and cut 10-15mins off training for every training sortie. Brize Norton or Lakenheath would be the next best reliable alternates if WAD and MAR are unavailable.	X			Acceptance of diversion commitments is a matter for internal MOD discussion and subject to approval by individual ATC units on a case by case basis, which is outside the scope of this ACP.
									how will a lost link (LL) Protector be communicated in order for other pilots to be aware?	X			Protector aircraft experiencing LL will transmit 7400 on Mode A and the pilot will establish alternate comms with ATC to confirm LL for onward transmission to affected air systems. As this will only occur in Controlled or Segregated airspace all other air systems will be in receipt of an ATS as per airspace rules so deconfliction can be achieved. The procedure does not impact the final airspace design.

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	O		Aviation	N/A	N/A	<b>Feedback from Stage 2:</b> Most GA VFR traffic will be operating at altitudes below 7000ft and so if the boundary between A & B were at or nearer this level it may further increase capacity for GA transits.	N/A	N/A	N/A		X	The level of the vertical separation has been designated at FL105, taking into account the needs of all airspace users. Should the airspace trial demonstrate FL105 is not the most effective level for vertical separation within the DA, a review may be conducted. However, it should be noted that due to ongoing modifications to the Trial Plan, the data may not be available prior to submission of this ACP. It should also be noted that Protector may be fitted with the full suite of DAA equipment in the long-term, thus potentially enabling a reduction to the upper limit of the airspace and removing the requirement for two separate internal sections.	
	I		Aviation	N/A	N/A	<b>Feedback from Stage 2:</b> If there was a further modification to either or both options that was along the lines of below 1,500 AGL the drone will fly the standard circuit and thus the cylinder could be narrowed or become an over sized rectangle over the circuit then this would take East Winch out of the equation and allow us to maintain operations in and out of East Winch at 1,000ft AGL. providing both vertical and horizontal separation, Bouton aircraft would also be able to use East Winch as a diversion if needed. Has this been considered and discounted if so why?	N/A	N/A	N/A		X	The level of the vertical separation has been designated at FL105, taking into account the needs of all airspace users. Prior to this consultation at Stage 3, an LOA was implemented between the MOD and East Winch for the airspace trial under ACP-2023-047. The LOA is anticipated to be upheld for this ACP. Should the airspace trial demonstrate FL105 is not the most effective level for vertical separation within the DA, a review may be conducted. However, it should be noted that due to ongoing modifications to the Trial Plan, the data may not be available prior to submission of this ACP. It should also be noted that Protector may be fitted with the full suite of DAA equipment in the long-term, thus potentially enabling a reduction to the upper limit of the airspace and removing the requirement for two separate internal sections.	
	O		None of these	Not Sure					Natural England has no comments to make on this proposal. The lack of comment from Natural England does not imply that there are no impacts on the natural environment, but only that the application is not likely to result in significant impacts on statutory designated nature conservation sites. Natural England has not assessed this application for impacts on protected species. Natural England has published Standing Advice which you can use to assess impacts on protected species.	X		An environmental assessment was conducted by the Change Sponsor at Stage 3 (paragraph 5.3 of the Consultation Document). The Change Sponsor is not aware of any changes to the environmental impacts assessed at Stage 3, but should any emerge prior to ACP submission, they will be articulated in the Full Options Appraisal at Stage 4. Therefore, the feedback does not impact the final airspace design.	