



ACP-2024-028

**GATEWAY DOCUMENTATION:
STAGE 1 DEFINE**

Roles

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Glossary of Terms

Term	Definition
AAL	Above Aerodrome Level
ACP	Airspace Change Proposal
AGL	Above Ground Level
AIP	Aeronautical Information Publication
AIRAC	Aeronautical Information Regulation and Control
AMSL	Above Mean Sea Level
AOI	Area of Interest
ARP	Aerodrome Reference Point
ATC	Air Traffic Control
ATS	Air Traffic Service
ATZ	Air Traffic Zone
AWR	Air Weapons Range
BVLOS	Beyond Visual Line of Sight
CAP	Civil Aviation Publications
CAS	Controlled Airspace
CTA	Control Area
CTR	Control Zone
DA	Danger Area
DAA	Detect and Avoid
EAAA	East Anglia Air Ambulance
FL	Flight Level
FT	Feet
GA	General Aviation
ICAO	International Civil Aviation Organization
KHF	Kings Helicopter Flight
LARS	Lower Airspace Radar Service
LFA	Low Flying Area
MAA	Military Aviation Authority
MATZ	Military Aerodrome Traffic Zone
MDP	Mandatory Design Principles
MOD	Ministry of Defence
MRP	MAA Regulatory Publications
NOTAM	Notices to Aviation
PINS	Pipeline Inspection Notification System
PMR	Provost Marshall Restricted Area
RAF	Royal Air Force
RLLC	Royal Low-Level Corridor
RPAS	Remotely Piloted Air System
SUACS	Special Use Airspace Crossing Service
SUAIS	Special Use Airspace Information Service
TDA	Temporary Danger Area
UAV	Uncrewed Air Vehicle
USAF	United States Air Force

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1 Introduction

1.1 Requirement

- 1.1.1 There is a requirement to introduce a volume of segregated airspace adjacent to, and potentially overlapping, the airspace currently designated as EGD207 Holbeach Air Weapons Range (AWR).
- 1.1.2 Protector's main operating base is RAF Waddington but requires access to a specific ground-based target which, within the UK, is only available at two locations: EGD207, Holbeach AWR and EGD402&3, Luce Bay, Scotland. Owing to its geographical location, EGD402&3 is currently inaccessible to Protector due to the classification of airspace that would need to be entered during transit, as outlined below in paragraph 2.1.1. Therefore, EGD207 is considered the only viable option. An Airspace Change Proposal (ACP), ACP-2024-014, is already in progress to propose a temporary solution for short-term utilisation of the requisite ground-based equipment.
- 1.1.3 This ACP, ACP-2024-028, seeks to identify a permanent airspace solution to enable enduring use of the ground-based equipment.

1.2 Background

- 1.2.1 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 (BVLOS¹) RPAS operations within UK airspace, such that BVLOS operations should only be conducted if:
- An appropriately approved Detect and Avoid (DAA) capability enables compliance with 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 or in controlled airspace (classes A-D) with the informed consent of the ANSP.
- 1.2.2 The Ministry of Defence (MOD) has assessed that the flight profiles to carry out the required operational 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 conducting the required operations.
- 1.2.3 Protector is fitted with a limited DAA capability only and, since the proposed area of activity 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.
- ## 1.3 Scope
- 1.3.1 In accordance with CAP 1616F², the Change Sponsor compiled the current-day scenario described in annex C to inform identified stakeholders on the existing situation and to enable assessment of the impacts of the proposed airspace change. The Change Sponsor has also provided a list of design principles (DPs) to provide a framework against which the design options can be developed and evaluated as part of the process. The DPs have been provided, along with the current-day scenario, to identified stakeholders and this document

¹ 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.

² [Guidance on Airspace Change Process for Permanent Airspace Change Proposals](#)

demonstrates how the Change Sponsor is engaging with those stakeholders, with evidence provided.

1.3.2 The area within a 20NM radius of the anticipated airspace centre point, the ground target at Holbeach AWR, has been elected as the Area of Interest (AOI) for defining the current-day scenario. This was considered a suitable region due to the nature of the proposed airspace, coupled with the intended frequency of use.

1.4 Current-day Scenario

1.4.1 In accordance with the airspace change process, the Change Sponsor prepared and distributed a 'Current Day Scenario' document to provide a clear description of the current impacts and sets the context for all stakeholders. This can be found at Annex C.

2 Design Principles

2.1 Draft Design Principles

2.1.1 Five draft DPs, aligned with previous Protector-related airspace changes, were proposed for feedback from stakeholders identified in Section 6; three mandatory DPs³ and two discretionary DPs⁴. To align with previous related ACPs, the concept of using the discretionary DPs defined in CAP1616f was rejected to avoid complexity. Furthermore, these DPs majored on Environmental Impact principles for commercial traffic. Given the provisional work already undertaken for the temporary airspace change, it was assessed that environmental impacts could be accounted for under a single DP, 'to minimise the impact on other aviation stakeholders' (DP4); this was considered appropriate to Stage 1 in the process and could be developed in detail at later stages. The draft DPs, in order of priority, are in Table 1 below:

Ref	Category	Design Principle	Initial Rationale
DP1 (MDP)	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. Currently Holbeach AWR has insufficient airspace to safely contain all Protector operational requirements. In addition, the rules of air do not allow BVLOS RPAS operations in Class G airspace. Therefore, it is necessary to implement some form of segregated airspace to ensure the safe operation of Protector.
DP2 (DDP)	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 for Protector to conduct all requisite activity within Holbeach AWR.
DP3 (DDP)	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.

³ Referenced as (MDP) in Tables 1 and 2

⁴ Referenced as (DDP) in Tables 1 and 2

Table 1: Draft Design Principles			
Ref	Category	Design Principle	Initial Rationale
DP4 (MDP)	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 in addressing environmental factors.
DP5 (MDP)	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.

2.2 Design Principle Evolution

2.2.1 Following a four-week engagement period (see section 6), the Change Sponsor received limited feedback on the provided DPs. A total of 10 stakeholders responded, with either no comment (thus acknowledging the engagement process), or with comments that fed into either the DP definition or rationale. No feedback was received on the order of priority. Relevant comments are collated and arranged (under the related draft DPs) in a DP matrix at Annex A. All comments were reviewed and responded to. In summary:

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

No feedback received therefore no revision made.

- **DP2-DP5.**

No feedback received, therefore no revision made. As the Change Sponsor formulated the draft DPs utilising principles previously used for ACPs related to the Protector programme, the wording of DP2 through DP5 was updated to align with CAP1616 V5 (as updated). The Change Sponsor can confirm that there are no technical context changes between the engaged and selected DPs. Engaged stakeholders have been informed as per the Engagement Chronology found in section 2. At the time of submission, no further comments were received

2.2.2 From the limited feedback received and following the updates to the DPs in CAP1616 V5 (as amended), the Change Sponsor felt it appropriate to introduce a further DP after the engagement process, allocated DP6 to expand to include airport & aerodrome operators.

2.2.3 Feedback was primarily received from representatives from airfields, airports and aviation stakeholders. As such, the Change Sponsor deemed it necessary to introduce an additional DP (DP6) to consider the requirements of affected ANSPs and other aviation stakeholders as follows:

- The airspace change proposal should consider the requirements of operators and owners of all classes of aircraft, including general aviation and other civilian airspace users.

Ref	Category	Design Principle	Decision Rationale
DP1	Safety	The airspace change proposal must maintain a high standard of safety and should seek to enhance current levels of safety.	No Revisions proposed.
DP2	Technical (MOD requirements)	The airspace change proposal should be compatible with the requirements of the MoD.	Reworded to align with the DP from CAP1616 V5. No technical context changes in DP from that engaged on prior.
DP3	Technical (Accessibility for all airspace users)	The airspace change proposal should consider the requirements of operators and owners of all classes of aircraft, including general aviation and other civilian airspace users.	Reworded to align with the DP from CAP1616 V5. No technical context changes in DP from that engaged on prior.
DP4	Environment	The airspace change proposal should deliver the Government's environmental objectives with respect to air navigation as set out in the Government's Air Navigation Guidance 2017.	Reworded to align with the DP from CAP1616 V5. No technical context changes in DP from that engaged on prior.
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.	No Revisions proposed.
DP6	Technical (Other aviation stakeholder)	The airspace change proposal should consider the impacts on air navigation service providers and other aviation stakeholder such as nearby airport operators.	Following the engagement with surrounding airport operators and owners, the Change Sponsor decided it be appropriate to implement this design principal from CAP1616 v5.

2.3 Design Principle Prioritisation

- 2.3.1 The Change Sponsor received no feedback relating to the prioritisation of the DPs, therefore, the order of prioritisation has been determined by the rationale and comments received from stakeholders. The Change Sponsor determined that Safety is the highest priority; therefore, DP1 is assigned Priority 1.

- 2.3.2 As the airspace change relates to a specific requirement for the MoD, the Change Sponsor identified DP2 as the second highest priority, as the change must be compatible with the requirements of the MoD, specifically Protector.
- 2.3.3 Three comments were received concerning provision of an ATS, to accommodate access to the airspace for other airspace users. Therefore, the Change Sponsor altered the prioritisation for this DP accordingly.
- 2.3.4 As four of the responding stakeholders represent (or commented on issues affecting) ANSPs and other aviation stakeholders (such as nearby airport operators), the Change Sponsor determined it was appropriate to add the new DP as priority 4.
- 2.3.5 One stakeholder queried how ACP-2024-028 relates to the Airspace Modernisation Strategy (AMS). The response is available in the Raw Engagement Evidence (Appendix 1). Whilst the AMS provides direction on the integration of BVLoS activity and a roadmap to integrating, the activity Protector is required to undertake (Electronic & Optical Hazards) will require segregation, in accordance with MAA policy. The Change Sponsor has allocated this mandatory DP priority 5.
- 2.3.6 In accordance with CAP 1616i⁵, the MOD need only ever assess the anticipated environmental impacts of the consequential changes on civil aviation patterns. Environmental impacts that are a direct result of military aircraft or military operations (including civil aircraft carrying out military function under contract) are not required to be considered or assessed. Consequential environmental impacts from other airspace users (i.e., civil aviation) that are a result of the airspace change proposal must be assessed. therefore, the Change Sponsor deems it appropriate to allocate this MDP priority 6.

2.4 Selected Design Principles

- 2.4.1 The Change Sponsor proposes to proceed with the DPs as described below in Table 3. The Change Sponsor continues to welcome feedback on DPs through the start of Stage 2 where any revising can be implemented as necessary. The Change Sponsor has notified stakeholders; at the time of submission, no further comments were received.

Table 3: Selected Design Principles (in order of priority)			
Priority	Ref	Category	Design Principle
1	DP1	MDP Safety	The airspace change proposal must maintain a high standard of safety and should seek to enhance current levels of safety.
2	DP2	Technical (MOD requirements)	The airspace change proposal should be compatible with the requirements of the MoD.
3	DP3	Technical (Accessibility for all airspace users)	The airspace change proposal should consider the requirements of operators and owners of all classes of aircraft, including general aviation and other civilian airspace users.
4	DP6	Technical (Other aviation stakeholder)	The airspace change proposal should consider the impacts on air navigation service providers and other aviation stakeholder such as nearby airport operators.

⁵ [CAP 1616i Environmental Assessment Requirements and Guidance for Airspace Change Proposals](#)

Table 3: Selected Design Principles (in order of priority)			
Priority	Ref	Category	Design Principle
5	DP5	MDP 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.
6	DP4	MDP Environment (Other aviation stakeholders)	The airspace change proposal should deliver the Government's environmental objectives with respect to air navigation as set out in the Government's Air Navigation Guidance 2017.

3 Stakeholder Engagement

3.1 Stakeholder Identification

3.1.1 Under a separate ACP⁶, a temporary airspace proposal is underway in the form of a Temporary Danger Area (TDA) at Holbeach AWR. The temporary airspace change seeks to enable Protector to safely conduct essential operations for data collection and procedures development. Therefore, the area potentially affected for the airspace trial and the permanent solution are the same (Figure 1). The MOD selected stakeholders for the temporary airspace change from an area within a radius approximately 20 miles of the ground-based target at Holbeach AWR⁷. The Change Sponsor deemed this AIO suitable for this permanent airspace change proposal.

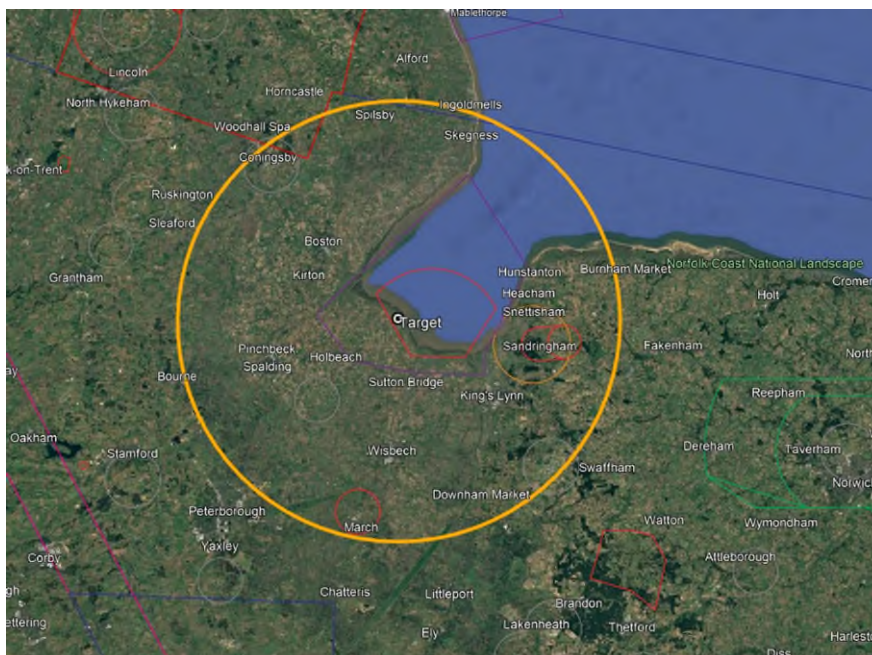


Figure 1: ACP-2024-028 - AOI

3.1.2 Aviation stakeholders contacted as part of ACP-2024-014 were subsequently invited to consider the DPs for this **permanent airspace proposal** and included local General Aviation (GA) aerodromes, GA operators, commercial airports and National Air Traffic Management Advisory Committee (NATMAC) representatives.

3.1.3 In addition to stakeholders identified for the temporary airspace change, research was undertaken within the defined area to identify local authorities, and other entities potentially affected. Local authority at county, district and parish level are included. District council level was considered important as this is the level at which planning committees sit. Parish councils sitting within the immediate vicinity of Holbeach AWR only were targeted at Stage 1, the addition of parish councils from a wider area may be considered at the latter stages of the ACP, if appropriate.

3.1.4 The following stakeholders were identified by scrutiny of aeronautical charts, research via government websites. Additional stakeholders who were identified with during ACP-2024-014 were also engaged with during Stage 1 of this airspace change proposal.

⁶ [ACP-2024-014](#)

⁷ Ground-based target located at 525153N 0001002E

Table 4: ACP-2024-028 Identified Stakeholders			
Aviation Stakeholders - NATMAC			
Airlines UK	Airport Operators Association (AOA)	Airfield Operators Group (AOG)	Aircraft Owners and Pilots Association (AOPA)
Airspace Change Organising Group (ACOG)	Association of Remotely Piloted Aircraft Systems UK (ARPAS-UK)	Aviation Environment Federation (AEF)	British Airways (BA)
BAe Systems	British Airline Pilots Association (BALPA)	British Balloon and Airship Club	British Business and General Aviation Association (BBGA)
British Gliding Association (BGA)	British Helicopter Association (BHA)	British Microlight Aircraft Association (BMAA)	British Skydiving
Drone Major	General Aviation Alliance (GAA)	Guild of Air Traffic Control Officers (GATCO)	Honourable Company of Air Pilots (HCAP)
Helicopter Club of Great Britain (HCGB)	Isle of Man CAA	Light Aircraft Association (LAA)	Low Fare Airlines
Military Aviation Authority (MAA)	Ministry of Defence - Defence Airspace and Air Traffic Management (MoD DAATM)	NATS	Navy Command HQ
PPL/IR (Europe)	UK Airprox Board (UKAB)	UK Flight Safety Committee (UKFSC)	United States Visiting Forces (USVF), HQ United States Country Rep-UK (HQ USCR-UK).
Other Aviation Stakeholders			
AIRPROX BOARD	Helicentre Aviation (Pipeline Inspection)	Heli Air (Pipeline inspection)	PDG Helicopters
National Grid (Powerline inspection)	Drone Wars	Wingland Aerodrome	Dafforn Aerodrome
Lincs & Notts Air Ambulance			

3.2 Engagement Methods

- 3.2.1 Identified stakeholders were approached by written communication for their feedback on the DPs and Current Day Scenario. 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 TDA. In-person engagement would be of more benefit at Stage 2 of the ACP when proposed design options are available.
- 3.2.2 There were no EAAUWG meetings during the Stage 1 engagement period; therefore, all engagement was conducted via email. Stakeholders were issued with the draft DPs and current day scenario for feedback. Table 5 below depicts the engagement process undertaken with stakeholders and the CAA.
- 3.2.3 Due to the low number of responses received throughout both the engagement period, the Change Sponsor conversed with the CAA to discuss the absence of feedback and how best to proceed. Following the initial engagement period end date, the Change Sponsor contacted 3 key stakeholders directly to ensure their views are understood. These included Dafforn and Wingland aerodromes, who sit closest to the range and Lincs & Notts Air Ambulance who operate emergency flights within the area.

3.3 Engagement Chronology

3.3.1 Table 5 below summarises the Stage 1 engagement activity undertaken.

Table 5: Engagement Chronology		
Date	Action / Stakeholders Contacted	Notes
1 July 2024	Statement of Need version 1 published on the CAA Airspace Change Portal	
10 July 2024	Statement of Need version 2 published on the CAA Airspace Change Portal	
17 October 2025	Local authority and identified aviation stakeholders.	Engagement letter sent by email.
7 November 2025	Local authority and identified aviation stakeholders.	Reminder email sent.
14 November 2025	Airspace Regulation, Civil Aviation Authority	Email sent highlighting engagement experience.
19 November 2025	Key local stakeholders	Email inviting feedback following CAA guidance.
03 December 2025	Local authority and identified aviation stakeholders including Key local stakeholders.	Email confirming Design Principles.

3.4 Feedback Out of Scope

3.4.1 Responses were received from 3 stakeholders that contained queries or suggestions out of scope in terms of addressing the suitability of the DPs and assessment of the current day scenario. The three responses, although titled for ACP-2024-028, it was evident that they were in fact relating to ACP-2024-014 (the TDA proposal for Holbeach). The Change Sponsor reiterated this engagement referred to the permanent ACP-2024-028 and requested to reconsider the documentation.

- 3.4.2 In addition, one response was received reaffirming the activity at Wingland airfield, which had been identified within the current day scenario. This response also contained feedback relating to a potential design option which was out of scope at this stage of the process. The stakeholder's feedback has been noted and will be included at Stage 2.

4 Next Steps

4.1 Submission

4.1.1 This document will be submitted to the CAA, together with evidence of engagement to progress Stage 1 - Define of the CAP1616 airspace change process. The CAA's Assessment Gateway is scheduled for 30 January 2026.

4.2 Timeline

4.2.1 A copy of the agreed timeline is available on the CAA's Airspace Change Portal and also depicted below at Table 6.

Table 6: ACP-2024-028 Timeline	
CAP1616 Gateway	Planned Date
Stage 1 – Define	30 January 2026
Stage 2 – Develop & Assess	29 May 2026
Stage 3 – Consult	26 June 2026
Stage 4 – Update & Submit ACP	10 October 2026
Stage 5 – Decide	29 January 2027
Stage 6 – Implement	AIRAC 05/2027

5 Annexes

5.1.1 List of Annexes

[Annex A – Design Principles Matrix](#)

[Annex B – Engagement Letter](#)

[Annex C – Current Day Scenario](#)

6 Appendix

6.1.1 Appendix1 - Raw Engagement Evidence – See supporting document

Annex A – ACP-2024-028 Design Principles Matrix

DP	Category	Initially Proposed DP	Feedback										Selected DP	Rationale
			Stakeholder 1	Stakeholder 2	Stakeholder 3	Stakeholder 4	Stakeholder 5	Stakeholder 6	Stakeholder 7	Stakeholder 8	Stakeholder 9	Stakeholder 10		
			(Norwich)	South Holland Council	(Felthorpe AD)	(BGA)	(Helicentre)	(Wingland AD)	(NATS)	(DAATM)	(NPAS)	(Lincs & Notts Air Ambulance)		
DP 1	Safety	The airspace change proposal must maintain a high standard of safety and should seek to enhance current levels of safety.	No comment	No comment	No comment	No comment	No comment	No comment	No comment	No comment	No comment	No comment	The airspace change proposal must maintain a high standard of safety and should seek to enhance current levels of safety.	No Revisions proposed.
DP 2	Technical (MOD requirements)	The airspace provides access to a sufficient area to meet operational and training objectives.	No comment	No comment	Appreciates the need for appropriate training airspace for emerging platforms such as Protector.	The stakeholder wished to understand the 'end game' for MoD related ACPs for Protector. A copy of the response can be found in the appendices.	No comment	No comment	No comment	No comment	No comment	No comment	The airspace change proposal should be compatible with the requirements of the MoD.	Reworded to align with the DP from CAP1616 V5. No technical context changes in DP from that engaged on prior.
DP 3	Technical (Accessibility for all airspace users)	The airspace change proposal should consider the requirements of other airspace users by maximising accessibility to other airspace users.	No comment	No comment	The stakeholder highlighted concern regarding the possibility of a potential	No comment	The stakeholder highlighted with a provision to accommodate access for their tasking with a crossing	No comment	No comment	No comment	The stakeholder fed back their access requirements are limited, but impact alleviated	The stakeholder fed back their access requirements under a Cat A/Emergency flight status, but	The airspace change proposal should consider the requirements of operators and owners of all classes of aircraft,	Reworded to align with the DP from CAP1616 V5. No technical context changes in DP from that

DP	Category	Initially Proposed DP	Feedback										Selected DP	Rationale	
			Stakeholder 1	Stakeholder 2	Stakeholder 3	Stakeholder 4	Stakeholder 5	Stakeholder 6	Stakeholder 7	Stakeholder 8	Stakeholder 9	Stakeholder 10			
			(Norwich)	South Holland Council	(Felthorpe AD)	(BGA)	(Helicentre)	(Wingland AD)	(NATS)	(DAATM)	(NPAS)	(Lincs & Notts Air Ambulance)			
					pinch point between the DA and Fenlands ATZ.		service would reduce the impact their operation.				with the provision of a crossing service (LARS mentioned by stakeholder)	impact alleviated with the provision of a crossing service or cease of activity via aviation or marine channels.	including general aviation and other civilian airspace users.	engaged on prior.	
DP 4	Environment	The airspace change proposal should consider the impacts on air navigation service providers and other aviation stakeholders such as nearby airport operators.	No comment	No comment	No comment	No comment	No comment	No comment	No comment	No comment	No comment	No comment	No comment	The airspace change proposal should deliver the Government's environmental objectives with respect to air navigation as set out in the Government's Air Navigation Guidance 2017.	Reworded to align with the DP from CAP1616 V5. No technical context changes in DP from that engaged on prior.
DP 5	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.	No comment	No comment	No comment	The stakeholder questioned how the change supports the AMS. A copy of the response can be found in the	No comment	No comment	No comment	No comment	No comment	No comment	No comment	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 Revisions proposed.

DP	Category	Initially Proposed DP	Feedback										Selected DP	Rationale	
			Stakeholder 1	Stakeholder 2	Stakeholder 3	Stakeholder 4	Stakeholder 5	Stakeholder 6	Stakeholder 7	Stakeholder 8	Stakeholder 9	Stakeholder 10			
			[Redacted] (Norwich)	South Holland Council	[Redacted] (Felthorpe AD)	[Redacted] (BGA)	[Redacted] (Helicentre)	[Redacted] (Wingland AD)	[Redacted] (NATS)	[Redacted] (DAATM)	[Redacted] (NPAS)	[Redacted] (Lincs & Notts Air Ambulance)			
						appendices.									
DP 6	Technical (Other aviation stakeholder)		No comment.	No comment	No comment	No comment	No comment	No comment	No comment	No comment	No comment	No comment	No comment	No comment	<p>The airspace change proposal should consider the impacts on air navigation service providers and other aviation stakeholder such as nearby airport operators.</p> <p>Following the engagement with surrounding airport operators and owners, the Change Sponsor decided it be appropriate to implement this design principal from CAP1616 v5.</p>

Annex B: ACP-2024-028 Engagement Letter



Ministry
of Defence

Airspace Change Proposal – ACP-2024-028

Headquarters Air Command

Room 1W27, Spitfire Block

Royal Air Force

HIGH WYCOMBE

Buckinghamshire

HP14 4UE

17 October 2025

Introduction

This document forms part of the permanent Airspace Change Process as defined in the latest version of the Civil Aviation Publication (CAP) 1616, V5 effective in January 2024. Protector RG Mk1 is the Royal Air Force's Remotely Piloted Air System (RPAS) which operates Beyond Visual Line of Sight (BVLOS⁸) from RAF Waddington, Lincolnshire. Protector, certified to operate within UK airspace, is required to undertake activity utilising a specific ground-based target, which, within the UK, is only located within 2 existing Danger Areas (DA). Owing to its geographical location, EGD207 (Holbeach Air Weapons Range (AWR)) is the preferred option for these activities. To accommodate Protectors activity, it will be necessary to introduce a volume of segregated airspace adjacent to, and potentially overlapping, the airspace currently available at Holbeach AWR.



Protector RG Mk1 has a 79ft wingspan and is 38ft in length. It is powered by a single TPE 331-10 turbo-prop engine and is certified to fly in UK airspace. The aircraft is operated by fully qualified RAF pilots. Since its arrival in the UK, the aircraft has operated several flights around the south of the UK.

The Change Sponsor is also currently seeking additional airspace in the form of a Temporary

Danger Area (TDA), referenced ACP-2024-014⁹, which increases the segregated airspace around EGD207. This will enable Protector safe conduct of essential trials, data collection and procedures development. Upon completion of use of the TDA, a long-term solution will be required to facilitate enduring use of the ground-based equipment. **This document is in relation to the ACP for the long-term solution only.** Note: The additional airspace will only be activated for short periods when Protector is required to use the ground-based target.

As an identified stakeholder, you may have previously been approached for feedback on ACP-2024-014; **however, this letter is part of the first stage of the airspace change proposal to provide a permanent solution at Holbeach AWR for Protector ([ACP-2024-028](#))**

Statement of Need

The formal Statement of Need is provided on the CAA ACP Portal as follows:

EGD207 is the preferred location for Protector test and calibration operations, due to its geographical location and the requisite ground-based equipment in-situ. The existing Danger Area construct is insufficient to accommodate the flight profiles required to conduct the activities; thus, an additional volume of airspace is proposed to enable flexible and efficient short periods of utilisation.

Regulatory Requirement

UK military aviation is regulated by the Military Aviation Authority (MAA). In accordance with regulatory requirement¹⁰, Protector must be flown using a Layered Safety Approach that specifically

⁸ 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.

⁹ [Airspace Change Portal - ACP-2024-014](#)

¹⁰ MAA Regulatory Article (RA) 2320 – MAA regulation for operation of military RPAS

requires flight in Segregated Airspace to enable Protector to conduct these activities in a safe environment and provide protection of other airspace users.

The Ministry of Defence (MOD) has assessed that the flight profiles to conduct the required operational activity cannot be 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 conducting the applicable operations.

Airspace Change Process

Changes to UK airspace are legally required to follow the process laid down in the CAP1616: Details of the process are available online¹¹. The CAP1616 process ensures a fair and transparent flow of information between the Change Sponsor and any affected stakeholders. The Change Sponsor for this proposal is the MOD. It also ensures that changes are not arbitrarily applied without full engagement and formal consultation. The CAA, as an impartial regulator, will hold Change Sponsors to account and ensure that CAP1616 is followed correctly as part of its decision-making responsibility.

The CAP1616 process for permanent airspace change comprises 7 stages. The stages are each considered by the CAA separately and sequentially. The process is not solution-driven, and each stage informs the next. The statement of need has been presented to the CAA during the assessment meeting, and the CAA has agreed that an airspace change is an appropriate means by which to achieve the MOD's requirement. Minutes from the Assessment Meeting CAA's online airspace change portal.

Current Day Scenario

As part of the CAP 1616 process, at stage 1, the Change Sponsor is required to share the current-day scenario alongside the proposed design principles to allow stakeholders to comment accordingly. The current day scenario has been provided with this engagement letter as Appendix 1 (**Annex C in this submission**).

Design Principles

The generation of options for any new airspace or procedures first requires airspace design principles to be developed. The MOD is keen to engage with stakeholders and is asking for feedback. The MOD intends to minimise the potential airspace change within the vicinity of Holbeach AWR. Therefore, stakeholders have been selected from an area within a radius of approximately 20 miles of the range to encourage feedback from as many potential stakeholders as possible.

The MOD has compiled a set of draft design principles, which are presented here for your consideration. When finalised, these design principles will be utilised to inform the assessment and progression of any airspace change design options.

You, as a stakeholder, are now invited to consider the draft design principles. The list below is not exhaustive, but you may like to comment on the following:

- Are there any other design principles you would like the MOD to consider?
- Would you like the MOD to discount any of its draft design principles?
- Should the MOD prioritise some design principles ahead of others?
- Do you require / would you like any more detail to be included in the design principles?

The MOD considers design principles 1 and 2 the priority as:

- Safety is paramount and underpins all airspace change;
- Access to adequate airspace is key to achieve training and operational objectives for Protector.

Any additional detail and reasoning behind your feedback is encouraged.

The MOD's draft design principles, in order of priority as a basis for engagement, are below.

Ref	Category	Design Principle	Initial Rationale
MDP1	Safety	The airspace change proposal must maintain a	Safety to airspace users is paramount to any airspace change. Currently

¹¹ CAP1616 Version 5 can be found at CAP 1616 - [Airspace Change Process \(caa.co.uk\)](http://caa.co.uk)

Ref	Category	Design Principle	Initial Rationale
		high standard of safety and should seek to enhance current levels of safety.	Holbeach AWR has insufficient airspace to safely contain all Protector operational requirements. In addition, the rules of air do not allow Remotely Piloted Air System (RPAS) Beyond Visual Line of Sight (BVLOS) operations in Class G airspace. Therefore, it is necessary to implement some form of segregated airspace to ensure the safe operation of Protector.
DDP2	Technical (MOD requirements)	The airspace change proposal should be compatible with the requirements of the Ministry of Defence.	The area required must be sufficient in shape and size for Protector to conduct all requisite activity within Holbeach AWR.
DDP3	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.
MDP4	Environment	The airspace change proposal should deliver the Government's key environmental objectives with respect to air navigation as set out in the Government's Air Navigation Guidance 2017.	Any airspace change must address the government environmental objectives, with the goal of limiting and reducing the environmental impact of aviation while supporting MOD national tasking and sustainable progress.
DDP5	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 in addressing environmental factors.
MDP6	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.

How to Provide Feedback

Feedback may have already been provided by you for the proposed TDA at Holbeach AWR as proposed in ACP-2024-014, and although the potentially affected area of ACP-2024-028 is in the same location, this proposal aims to implement airspace on a **permanent basis** and must be submitted as a separate application to the CAA. The CAA airspace change process, together with the Protector programme timescales, dictates that some processes for both proposals will run concurrently or in close succession. All details of this ACP are available on the CAA's Airspace Change Portal here: [ACP-2024-028](#).

Feedback on the proposed change, and what is important to you, should be sent to:

The Airspace Change Manager, via email at airspacechange2@ginetiq.com.

Please notify the Airspace Change Manager if you require a longer period of engagement or wish to receive clarification on any information.

The Change Sponsor has elected to run this engagement for a duration of 4 weeks. Therefore, stakeholders are requested to return feedback on the Draft Design Principles by cease work on **Friday 14 November 2025**.

Annex C: ACP-2024-028 Current-day Scenario

1 Introduction

There is a requirement to introduce a volume of permanent segregated airspace adjacent to, and potentially overlapping, the airspace currently designated as EGD207 Holbeach Air Weapons Range (AWR).

Protector's main operating base is RAF Waddington but requires access to a specific ground-based target which, within the UK, is only available at two locations: EGD207, Holbeach AWR and EGD402&3, Luce Bay, Scotland. Owing to its geographical location, EGD402&3 is currently inaccessible to Protector due to the classification of airspace that would need to be entered during transit. Therefore, EGD207 is considered the only viable option.

The Change Sponsor is also currently seeking additional airspace in the form of a Temporary Danger Area (TDA), referenced ACP-2024-014¹², which increases the existing segregated airspace around EGD207; this will enable Protector safe conduct of essential operations, including data collection and procedures development. Upon completion of use of the TDA, a permanent airspace solution is being sought. This will be required to facilitate enduring use of the ground-based equipment on an infrequent basis. This document is in relation to the ACP for permanent airspace only. Note: The additional airspace will only be activated for infrequent, short periods when Protector is required to use the ground-based target.

2 Current-day Scenario

2.1 Context.

2.1.1 Holbeach AWR is a MOD facility situated between Boston and King's Lynn in the civil parish of Gedney on The Wash, in Lincolnshire. The range extends over an area of 3,875 hectares (14.96 sq. miles), which includes 3,100 hectares of intertidal mudflats and 775 hectares of salt marsh. An array of eight static range targets includes several retired merchant ships, which have been beached on the sands of The Wash for the purpose of bombing practice. Observation towers ("Quadrants") parallel to the target line are manned and allow the fall of air system ordnance to be calculated for accuracy by means of triangulation. The range includes a helicopter-landing pad near the main control tower and range headquarters building¹³.

2.1.2 EGD207 is established for Holbeach AWR activity, as depicted on the local area map at Figure 1.

2.1.3 EGD207 intersects South Holland District Council as well as Boston and King's Lynn and West Norfolk Borough Councils. Whilst assessing current-day scenario, all three areas were taken into consideration.

¹² [Airspace Change Portal - ACP-2024-014](#)

¹³ Public Information Leaflet HQ DTE East: [DTE East Public Information leaflet \(publishing.service.gov.uk\)](#)

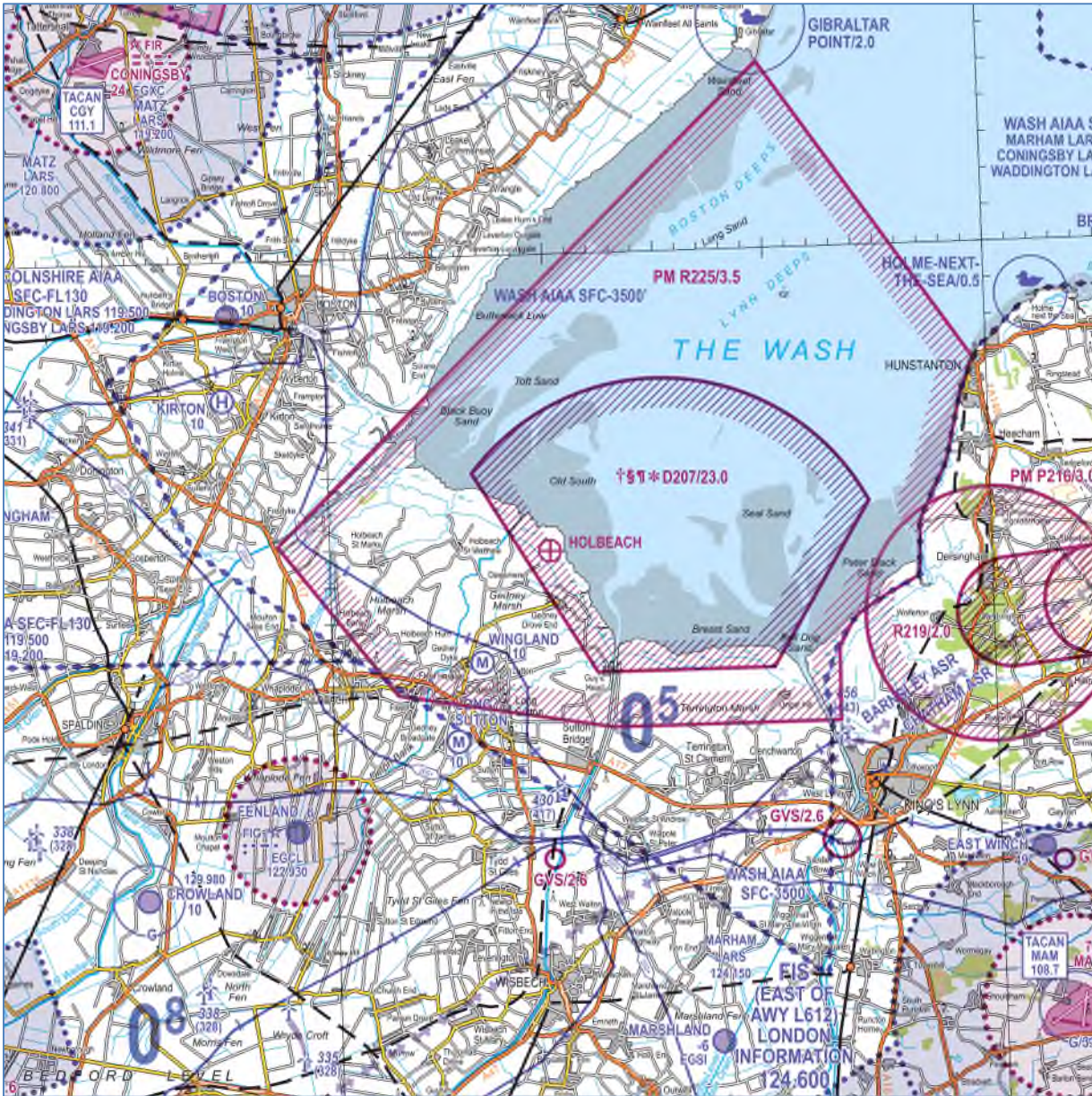


Figure 1: EGD207 Local Area Map¹⁴

2.2 Structures, Routes, Procedures and Behaviours.

2.2.1 Cross-section diagrams of the local airspace are at Figures 2 and 3 and are further described below.

¹⁴ 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).

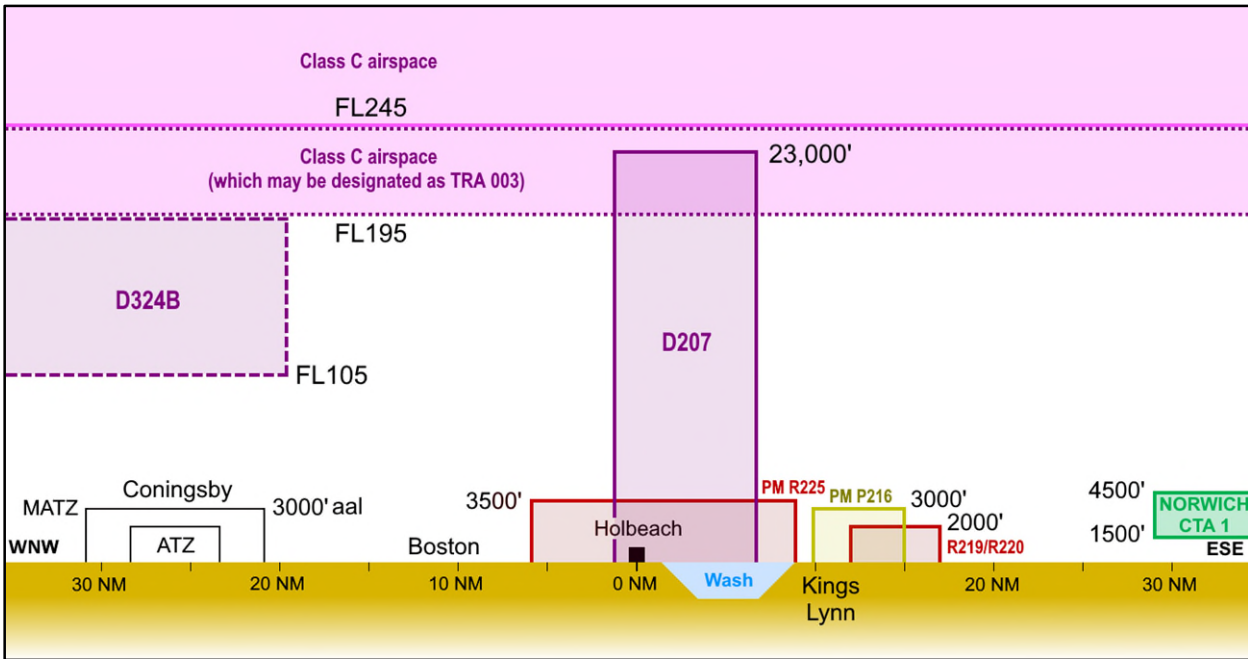


Figure 2: Cross-section Diagram of Local Airspace (orientation ESE to WNW)

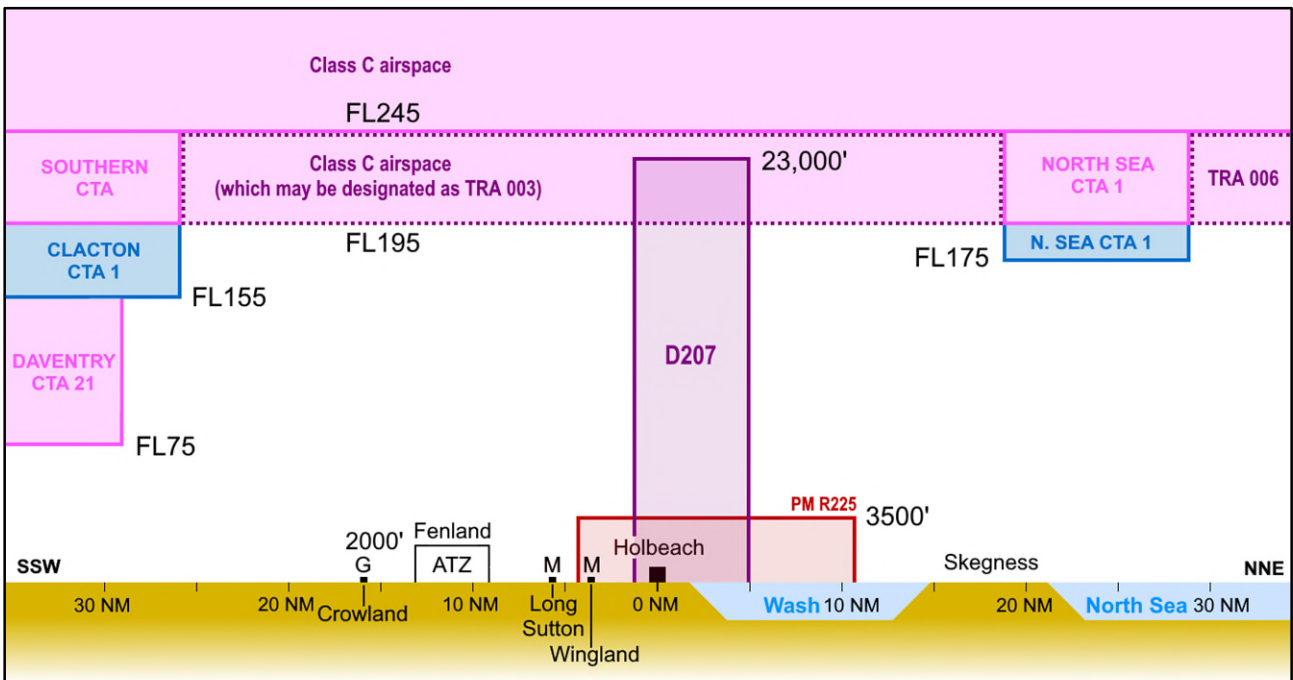


Figure 3: Cross-section Diagram of Local Airspace (orientation NNE to SSW)

2.2.2 Danger Area (DA) EGD207, Holbeach. Vertical limits of EGD207 are from surface to 23,000FT AMSL¹⁵; the portion of EGD207 below FL195 is laterally surrounded by Class G airspace. A Basic Service (non-radar) is provided by AWR controllers for transits to/from, and in close proximity to, EGD207 when the DA is active. Table 1 provides data for utilisation of GD207 for the 12 months since Sep 2024.

2.2.3 Controlled airspace. To the SE of EGD207 is Norwich Airport, surrounded by a Control Zone (CTR) and a Control Area (CTA), both up to 4,000FT AGL. Above EGD207, Class C extends from FL195 to FL245. During specified hours, the Class C airspace above is activated as a Temporary Reserved Area (TRA 003). Although the background classification between FL195 and FL245 is Class C, to

¹⁵ Above Mean Sea Level

avoid operational restrictions, military air systems may operate autonomously (when not occupied by Uncrewed Air Vehicles (UAV)).

- 2.2.4 Provost Marshall Restricted area PMR225, The Wash. Sitting at the lower portion of EGD207 from surface to 3,500FT AGL, with lateral limits extending beyond those of EGD207. The PMR is prohibited to military air systems except for pilots authorised to enter for range activity at Holbeach or Wainfleet weapons ranges, or pilots making an approach to Rwy 25 at RAF Coningsby using authorised ATC approach procedures. The airspace vertical limits are surface to 3,500FT.
- 2.2.5 Provost Marshall Area PM216, Sandringham House. Located to the East of EGD207 it is prohibited to military air system from 1 December to 1 March. Vertical limits are surface to 3,000FT AGL, circle radius 3.5NM centred on 52 49 47.0N 000 30 00.0E.
- 2.2.6 Restricted area EGR219, Sandringham House. Only accessible to specified air systems¹⁶. Vertical limits are surface to 2,000FT AGL in an area 524819N 0003104E thence clockwise by the arc of a circle radius 1.5NM centred on 524948N 0003049E to 525117N 0003033E - 525132N 0003424E thence anticlockwise by the arc of a circle radius 1.5NM centred on 525003N 0003447E to 524834N 0003510E - 524819N 0003049E.
- 2.2.7 Military Aerodrome Traffic Zones (MATZ). The Military Aerodrome Traffic Zone (MATZ) is ordinarily a circle 5NM radius centred on the Aerodrome Reference Point (ARP) and is notified from surface to 3,000FT AAL¹⁷. MATZ penetration by a military air system is subject to specific permission/clearance. The MATZ for RAF units Coningsby, Marham and Wittering are all within 20NM of EGD207 centre point.
- 2.2.8 Aerodrome Traffic Zones (ATZ). An ATZ is established to give protection to air system at the critical stages of flight when departing, arriving, and flying in the vicinity of an aerodrome. A circle 2.5NM radius centred on the ARP, usually notified from surface to 2,000FT AAL. All military aerodromes (including those listed at para 2.1.1.5) have an ATZ. In addition, the ATZ for Fenland aerodrome is within the Area of Interest (AOI).
- 2.2.9 Minor aerodromes. Wingland airfield (Microlight school routinely operating outside EGD207 published hours) and Long Sutton airfield (operating microlights) are key airspace users in the AOI. Other aerodromes located within the AOI are East Kirkby (Aviation Heritage Museum); Boston airfield; Crowland (Gliding); East Winch airstrip; and Great Massingham. In addition, there is a known unlicensed airstrip, Red House Farm (Dafforn), understood to house three high-performance light aircraft, with activity estimated being less than 10 movements per month (highest frequency being in the summertime).
- 2.2.10 Low Flying Areas (LFAs). Figure 4 depicts LFAs 5, 6 and 11, all located in the AOI. Of note are the Fenland Gap (on the LFA 5/6 boundary) and the Boston/Coningsby Gap (within LFA 11), the military statistics for which are detailed at paragraph 1.3.3.

¹⁶ See [eAIS Package United Kingdom \(nats.co.uk\)](https://nats.co.uk) for full list of air systems

¹⁷ AAL: Above Aerodrome Level



Figure 4: Pipeline Inspection Notification System (PINS) Areas and UK Day Low Flying System (DLFS) (Source - [AIP Publication ENR 2-20](#))

2.2.11 Contingency Route (T999). Figure 5 is a chart demonstrating Contingency Route (T999), which is activated by NOTAM in the event of a Lower Area Control failure where additional capacity is required to circumvent the UK airways Structure. The route runs to the west of Holbeach AWR, and in the event of activation, Range Orders outline how activity with EGD207 shall take place. T999 is notified via AIC Yellow¹⁸ available on the NATS AIS website¹⁹.

¹⁸ At the time of publishing, AIC Y 123/2025 is valid.

¹⁹ [NATS AIS Website - Publications](#)

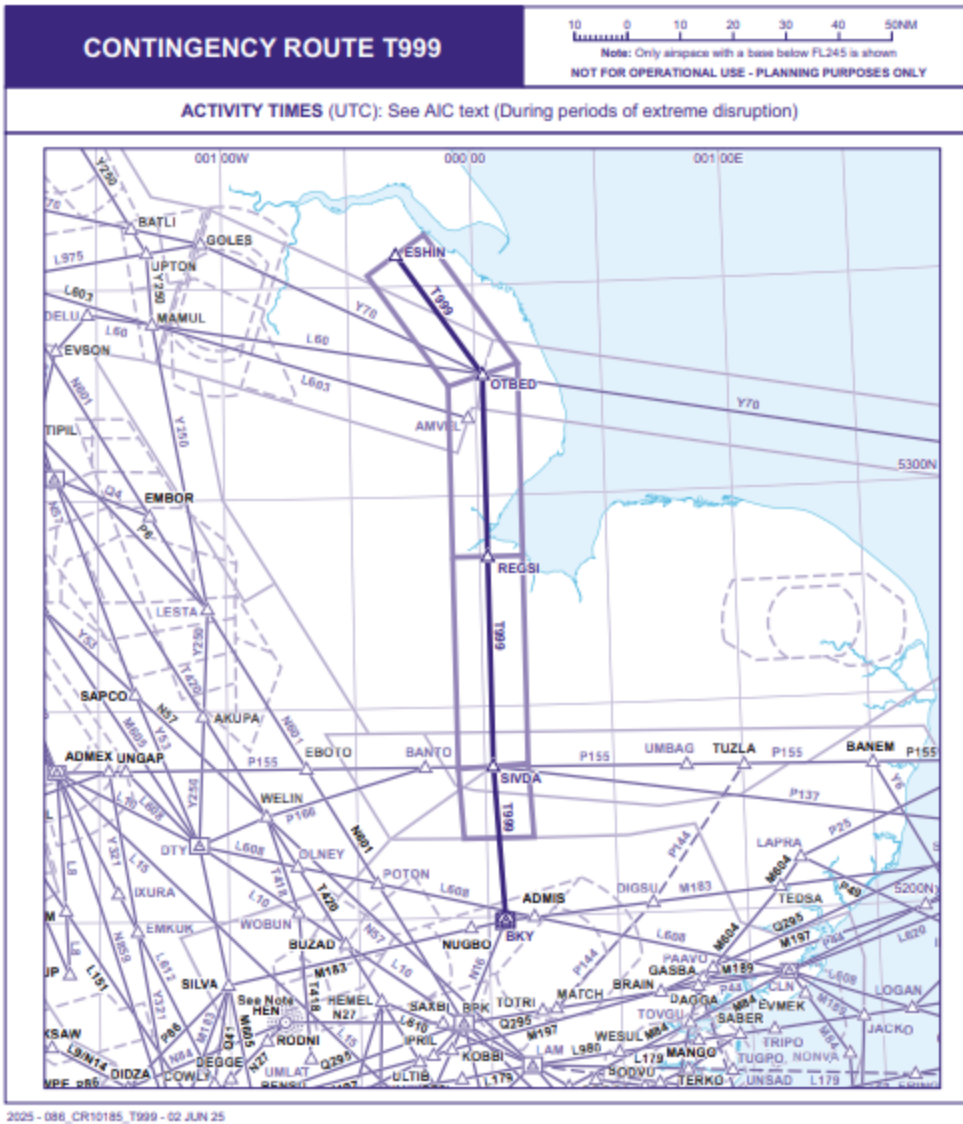


Figure 5: Contingency Route (T999)

2.3 Airspace Usage.

2.3.1 EGD207. Hours of activation are routinely Mon-Thu 0900-1700, Fri 0900-1200. Between September and April (Inc.) Tue, Thu 1700-2200; but can also be activated by NOTAM .The UK MOD and United States Air Force (USAF) air systems are the predominant users of EGD207, but over 20 fixed wing, rotary and UAV national and international air system types have been operating over recent years; Table 2 shows the total number of hours and passes witnessed at EGD207 in the last 12 months. At present, BVLOS activity is limited to below 18,000FT altitude; when Contingency ATC Route T999 is activated, BVLOS activity is further limited to below 12,000FT altitude. As part of this Airspace Change, the Change Sponsor wishes to remove such limitations to accommodate Protectors decent into EGD207 and the new extension. Military air systems would be not below 2,000FT AMSL when the DA is inactive. Access to TRA003 above, is not restricted to military users and a qualitative assessment by the operating authority determined that between one and six civilian air systems transit the airspace during operating hours, monthly. The number of air systems penetrating the DA outside operating hours is unknown.

- 2.3.2 PMR225. Hours of activation are routinely Mon-Thu 0900-1700, Fri 0900-1200, additionally 1700-2200 on Tues and Thurs from 1 September to 30 April. There is no quantitative data available for the PMR, but EGD207 operating authority estimates ten transits per day (none during severe weather but upwards of thirty per day during good weather). These consist of mainly light general aviation (GA) air systems receiving an Air Traffic Service (ATS) from RAF Marham or RAF Coningsby.

Table 1: Utilisation of EGD207		
2024-2025	No. of hours	No. of Passes
Sep 24	41.50	871
Oct 24	24.50	473
Nov 24	17.75	363
Dec 24	15.50	298
Jan 25	28.50	372
Feb 25	31.25	348
Mar 25	45.50	1302
Apr 25	71.99	1676
May 25	27.00	506
Jun 25	11.50	241
Jul 25	47.75	1078
Aug 25	46.25	1032
Sep 25	25.00	905

- 2.3.3 LFAs. Figure 6 shows a heat map of low-level military air system movements in the Fenland Gap (on the LFA 5/6 boundary) and the Boston/Coningsby Gap (within LFA 11), for the period June 2023 to June 2024²⁰. In addition, Table 2 contains the statistical representation of air systems operating in these areas.

²⁰ Figures for 2024 to 2025 were unavailable at time of writing but will be updated for the documentation, to be issued at next engagement activity.

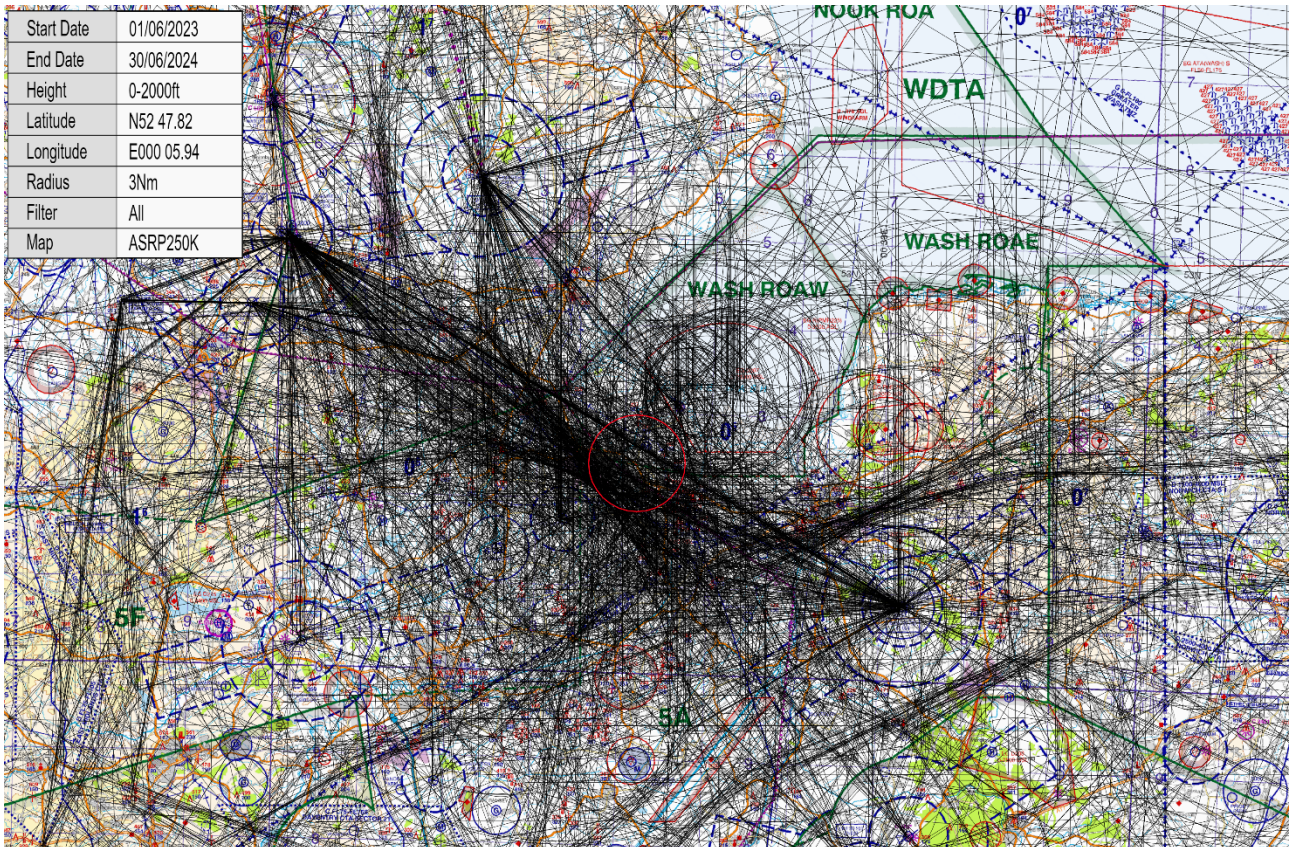


Figure 6: LFA Heat Map. Source - Military Low Flying | 78 Sqn | Swanwick Military

Table 2: Total Low Level movements 1 June 2023 – 30 June 2024				
Air system	Fenland Gap (within LFA 6)		Boston/Coningsby Gap (within LFA 11)	
	Sorties per year	Sorties per month (approx.)	Sorties per year	Sorties per month (approx.)
Rotary	156	13	40	3
Fixed wing	432	36	258	22
UAV ²¹	1	0	0	0
Totals	589	49	298	25

- 2.3.4 Local area. The airspace is popular for leisure flying (general aviation, gliding, paragliding, and parachute activity) and survey air systems. The airspace surrounding EGD207 benefits from air traffic services provided by several military and civilian agencies with good coverage under the Lower Airspace Radar Service (LARS) network. Air systems operating in the vicinity of EGD207 who wish to obtain an air traffic service typically receive a LARS from either RAF Marham, RAF Coningsby, or Norwich airport.
- 2.3.5 Air Ambulance. East Anglia Air Ambulance and Lincs and Notts Air Ambulance (LNAA) cover Lincolnshire, Norfolk, Suffolk, Cambridgeshire, and Bedfordshire 24 hours a day, 7 days a week. The Air Ambulance requires occasional access to cross EGD207 at short notice in response to Helicopter Emergency Medical Service (EHMS) tasking.
- 2.3.6 Royal Flights. The King’s Helicopter Flight (KHF) operates in and out of Sandringham House utilising RAF Marham for refuelling purposes. Controlled Airspace (temporary) (CAS (T)) and Royal Low-level Corridors are established to facilitate transit of Royal flights in/out of Sandringham House. In the event the King, or another Royal, wishes to operate Fixed

²¹Uncrewed Air Vehicle

Wing Aircraft, such aircraft will utilise RAF Marham with CAS(T) established for the Royals arrival and/or departure.

2.4 Safety Risks.

2.4.1 There are no current safety risks that the Change Sponsor is aware of in relation to the airspace of the current day scenario.

2.5 Local features below 7,000FT.

2.5.1 The Change Sponsor has assessed there are no Air Quality Management Areas (AQMA) relating to aviation but do exist for road and rail. In addition, there are no national parks or National Scenic Areas (NSA) within the AOI of this airspace change. Situated within the 20nm AOI is the Norfolk Coast Area of Outstanding Natural Beauty (AONB) however, although the proposed airspace will be from surface to FL195, it will not be overflowed by Protector below 7,000FT AMSL.

2.6 European sites overflowed below 3,000FT.

2.6.1 In addition to local features being review below 7,000FT, the change sponsor has also reviewed European sites within the AIO. There are a number of Special Areas of Conservation including The Wash & North Norfolk Coast, Roydon Common & Dersingham Bog, and the Norfolk Valley Fens. In addition, there are several Special Protection Areas, such as The Wash, Greater Wash and North Norfolk Coast. These three areas are also designated as RAMSAR sites. As above, although the proposed airspace will be from surface to FL195, it will not be overflowed by Protector below 7,000FT AMSL.

2.7 Environmental Impacts.

2.7.1 Greenhouse gas emissions, local air quality, tranquillity, and biodiversity have not been assessed at this stage, as they are expected to be negligible for the infrequent periods affecting only a small proportion of current traffic. The Change Sponsor has evaluated that current noise is primarily of that associated with military air systems referenced at Table 2, due to the operations conducted in and around EGD207. Any other source of noise is from GA activity. It was deemed that noise modelling a Class G environment would be disproportionate to the impact created. The Change Sponsor concluded there are no other environmental impacts relevant to the ACP²²²³²⁴.

2.8 Local Context.

2.8.1 There are currently no planning applications relevant to the proposed DA that the Change Sponsor is aware of²⁵²⁶. The Military Aviation Planning Portal²⁷ lists ten locations currently notified for local avoidance procedures; however, all of these are for flight not below 2,000FT or less, which would not be applicable to Protector operations in the DA and proposed extension.

²² [Green Infrastructure \(norfolkbiodiversity.org\)](https://www.greeninfrastructure.org/norfolk-biodiversity)

²³ [Environmental Permitting Regulations - Boston Borough Council](#)

²⁴ [Air Quality Monitoring & Annual Status Reports - South Holland District Council \(sholland.gov.uk\)](https://www.sholland.gov.uk/air-quality)

²⁵ [Planning Register : Lincolnshire County Council \(planning-register.co.uk\)](https://www.planning-register.co.uk/lincolnshire)

²⁶ [Planning Register : Lincolnshire County Council \(planning-register.co.uk\)](https://www.planning-register.co.uk/lincolnshire)

²⁷ [MAPP: Login \(natsmos.aero\)](https://www.natsmos.aero/mapp)