



## ACP-2024-028 AIRSPACE DESIGN OPTIONS – STAKEHOLDER ENGAGEMENT v2.0

### 1 Introduction

1.1. This document forms part of the airspace change process as defined in Civil Aviation Publication (CAP) 1616. ACP-2024-028<sup>1</sup> was commenced to adjust the lateral and vertical limits of EGD207 (Holbeach Air Weapons Range (AWR) to accommodate the activity of a large Remotely Piloted Air System (RPAS), Protector RG Mk1<sup>2</sup>, as well as the MoD's wider operational objectives. The Change Sponsor for this Airspace Change Proposal (ACP) is the Ministry of Defence (MOD).

### 2 Scope

2.1. At Stage 1 of this ACP, the Statement of Need (SON V2.0<sup>3</sup>) sought to introduce an enduring volume of segregated airspace adjacent to, and potentially overlapping, the airspace currently designated as EGD207 Holbeach Air Weapons Range (AWR) to accommodate Protector flight profiles whilst utilizing the ground-based equipment in-situ. Following the Stage 1 engagement process, it became evident that the requirements of all current and future platforms utilising EGD207 should be taken into consideration, to better accommodate the MoD's current and future requirements. The Change Sponsor has consulted with the Civil Aviation Authority (CAA) on how best to proceed: A revised SON) V3.0<sup>4</sup> has been agreed<sup>5</sup>.

2.2. It should be noted that **short-term** access to EGD207 Holbeach AWR has been approved for Protector under a separate MOD-sponsored ACP (ACP-2024-014<sup>6</sup>) by means of a Temporary Danger Area (TDA). This will support Protector Test and Evaluation activity during summer 2026, and is expected to last for 3 months. ACP-2024-014 has been approved by the CAA and may help inform the development of this ACP for a permanent airspace change.

2.3. This letter forms part of Stage 2 of ACP-2024-028, to propose a **permanent** airspace solution at EGD207 Holbeach AWR only.

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<sup>1</sup> [CAA Airspace Change Portal - ACP-2024-028](#)

<sup>2</sup> [Protector RG Mk1 \(MQ-9B\) - Royal Air Force](#)

<sup>3</sup> [ACP-2024-028 SON V2.0](#)

<sup>4</sup> [ACP-2024-028 SON V3.0](#)

<sup>5</sup> Supporting minutes of the meeting can be viewed [on the CAA Airspace Change Portal](#)

<sup>6</sup> [CAA Airspace Change Portal ACP-2014](#)

### 3 Regulatory Requirement

3.1. UK military aviation is regulated by the Military Aviation Authority (MAA). In accordance with regulatory requirement<sup>7</sup>, Protector must be flown using a Layered Safety Approach that specifically requires flight in Segregated Airspace to enable Protector to conduct these activities in a safe environment and provide protection of other airspace users.

3.2. The activity currently undertaken at EGD207Holbeach AWR, as outlined in UK AIP ENR5.1 Prohibited, Restricted and Danger Areas, and future Protector activity, all require the airspace classification to be that of segregated nature; therefore, the Change Sponsor has ruled out the implementation of controlled airspace.

### 4 Airspace Requirement

4.1. Protector requires access to a specific ground-based target which, within the UK, is only located within two existing Danger Areas (DA), EGD207 Holbeach AWR and EGD514, situated at West Freugh, Scotland. Owing to its geographical location, EGD207 is considered the preferred location for these activities.

4.2. The Change Sponsor has assessed that flight profiles of Protector cannot be contained within the current lateral boundary of EGD207, and that the wider MOD objectives necessitate a review the airspace currently available at EGD207 Holbeach AWR.

### 5 Background

5.1. EGD207 Holbeach AWR currently facilitates a variety of activity, undertaken by fixed Wing, rotary wing and RPAS. The MOD previously sought to change the airspace under ACP- 2017-046<sup>8</sup>, but was withdrawn in Jan 2021 following a review of future requirements.

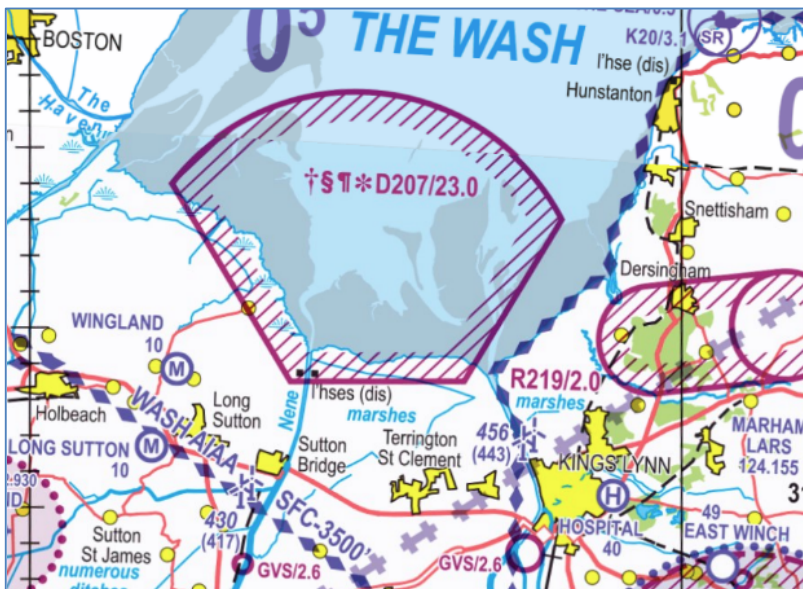


Figure 1: EGD207 Local Area Map<sup>9</sup>

<sup>7</sup> MAA Regulatory Article (RA) 2320 – MAA regulation for operation of military RPAS

<sup>8</sup> [CAA Airspace Change Portal - ACP-2017-46](#)

<sup>9</sup> 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).

## 6 Design Principles

6.1. DPs are developed with stakeholders to provide a shortlist of principles to inform the development of airspace design options. The Change Sponsor undertook engagement activity with a comprehensive list of aviation and non-aviation stakeholders to develop a set of Design Principles (DPs) for this ACP in 2025. Evidence from this engagement and the rationale for the selected DPs can be found on the CAA's ACP Portal<sup>10</sup>.

6.2. Following the agreement of SON V3.0, the Change Sponsor conducted an evaluation of the DPs agreed at Stage 1 and provided confirmation to the CAA (in March 2026) that the DPs remain an appropriate framework for the development and assessment of the design options. In addition, feedback received during Stage 1 regarding their suitability does not affect their applicability. Therefore, the Change Sponsor considered no additions, deletions, amendment or reorganisation of priorities were necessary.

6.3. The Change Sponsor welcomes feedback on the DPs resulting from the change to the SON.

6.4. Table 1 below outlines the selected DPs for ACP-2024-028. These DPs will be used to inform the development of the design options, against which the options can be quantitatively evaluated.

*Table 1: ACP 2024-028 Selected DPs 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	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.

## 7 Baseline Scenarios

<sup>10</sup> [See document titled ACP-2024-028 Stage 1 Submission](#)

7.1. The Change Sponsor must undertake an assessment of the impacts of the future scenario without any airspace change<sup>11</sup>, by comparison against the impacts of any proposed design options. To achieve this, the Change Sponsor has prepared two baseline scenarios as follows:

- A scenario based on the year of implementation without the airspace change proposed (year 1)
- A scenario based on 10 years after implantation without the airspace change proposed (year 10)

7.2. Both scenarios are provided at Annex A and the Change Sponsor is interested in your feedback as to their suitability. Changes to the use of the airspace, independent of the proposed airspace change (such as traffic growth and fleet changes), will be evaluated along with the design options and then measured against each of the DPs. An initial option appraisal on the impacts of each design option, including the baseline, will be conducted.

## **8 Design Options**

8.1. With the support of the Defence Airspace and Air Traffic Management (DAATM) team, the Change Sponsor and EGD207 Holbeach AWR management have conversed with range users (including Protector operators) to compile a list of requirements which, where possible, can be incorporated into the design options to maintain military-wide operational objectives.

8.2. The Change Sponsor also engaged with aviation stakeholders previously contacted for the TDA at EGD207 Holbeach AWR (ACP-2024-14). Feedback from these stakeholders and any additional feedback received during the implementation stage of the TDA will help inform the design options for the permanent solution.

8.3. Responses are invited from stakeholders on how they perceive the suitability of the options and their preferences. This will help determine the airspace design options to take through to Stage 3 of the airspace change process. Please note, this Stage 2 engagement process does not seek feedback on the TDA (ACP-2024-014); only feedback relating to the Design Options and Baseline Scenarios for ACP-2024-028 is requested.

8.4. The Change Sponsor is presenting 3 airspace design options. The proposals, which are constructed around the ground-based equipment in-situ at EGD207 Holbeach AWR, are presented to meet the requirements received during the engagement outlined in paragraph 8.1:

- Fast Jet ingress and egress from the south
- Aircraft formations approaching targets from the north
- Protector flight profiles

8.5. Design options 1-3 all replicate the footprint, but with varying sectorisations. The designs incorporate both the airspace utilised under ACP-2024-014 (TDA at EGD207 Holbeach AWR), plus the requirements of UK and partner forces utilising the AWR.

8.6. For areas within the design options relating to Protector activity, an internal division is incorporated (thereby splitting the airspace into 3 vertical sections) to facilitate more flexible air traffic management. When Protector is not within a section, it would be considered inactive and other aircraft may be permitted to enter that airspace. For

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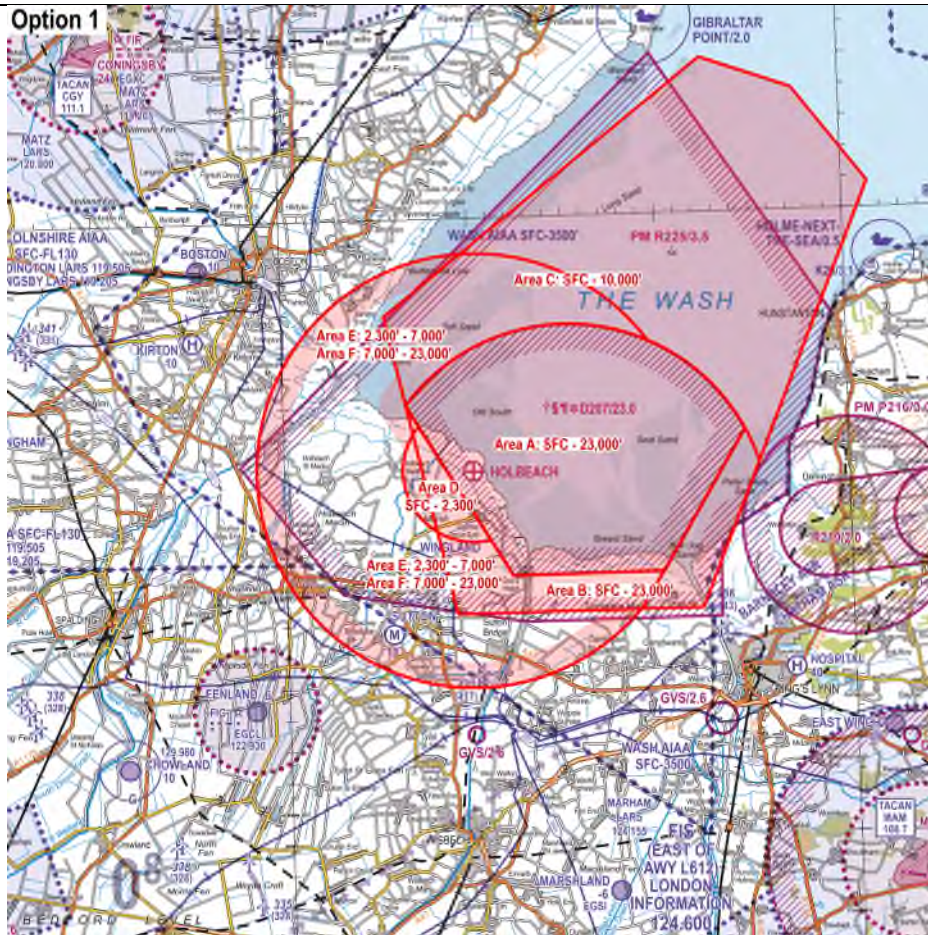
<sup>11</sup> CAP1616f – Stage 2 – Develop and Assess

example, should Protector be operating in Option 1, Area F, this division allows aircraft to transit the boundaries of Areas D and E. Aircraft will be unable to access sections Protector is operating in, or about to enter. This approach, which has been previously utilized in the RAF Waddington (ACP-2019-18) and RAF Marham (ACP-2023-022) airspace changes, and Holbeach Temporary Airspace Change (ACP-2024-014), will reduce holding times to airspace users and promote Flexible Use of Airspace (FUA). Sector activations would be via Notice to Aviation (NOTAM)<sup>12</sup>, as described in paragraph 9.

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<sup>12</sup> [Skybrary: NOTAM](#)

## Option 1



Source data: CAA VFR Aeronautical Chart 1:250K

Option 1: Six individual areas which may be activated flexibly, depending on the activity taking place.

Area A: Surface - 23,000ft above mean sea level (AMSL). Current EGD207 (Holbeach) lateral and vertical boundaries retained. Activation as published in the AIP.

Area B: Surface – 23,000ft AMSL. Activated by NOTAM only when required, to accommodate fast jet ingress and egress to the south.

Area C: Surface – 10,000ft AMSL. Activated by NOTAM only when required, to accommodate aircraft formations approaching targets from the northeast.

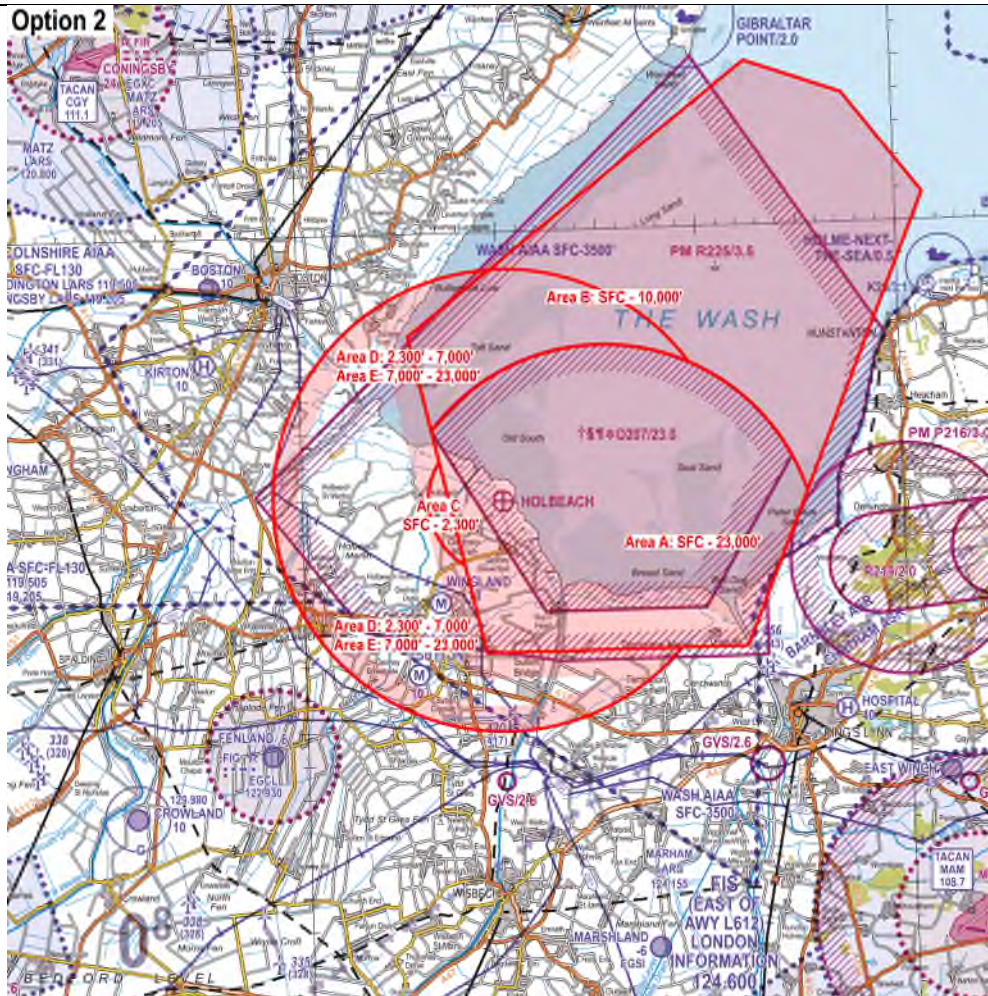
Area D: Surface – 2,300ft AMSL. Activated by NOTAM for Protector flight profiles.

Area E: 2,300ft – 7,000ft AMSL. Activated by NOTAM for Protector flight profiles.

Area F: 7,000ft – 23,000ft AMSL. Activated by NOTAM for Protector flight profiles.

NOTE: Areas D, E & F would be activated with Area A, but will not be activated concurrently with Areas B & C, and vice versa.

## Option 2



Source data: CAA VFR Aeronautical Chart 1:250K

Option 2 is designed into five individual areas which may be activated flexibly, depending on the activity taking place.

Area A, Surface - 23,000ft. Current EGD207 (Holbeach) lateral and vertical boundaries with the fast jet ingress and egress to the south included. This option would make day-to-day airspace larger, with fewer NOTAMs, following the current activation as published in the AIP.

Area B, Surface – 10,000ft. Activated by NOTAM when required for aircraft formations approaching targets from the northeast.

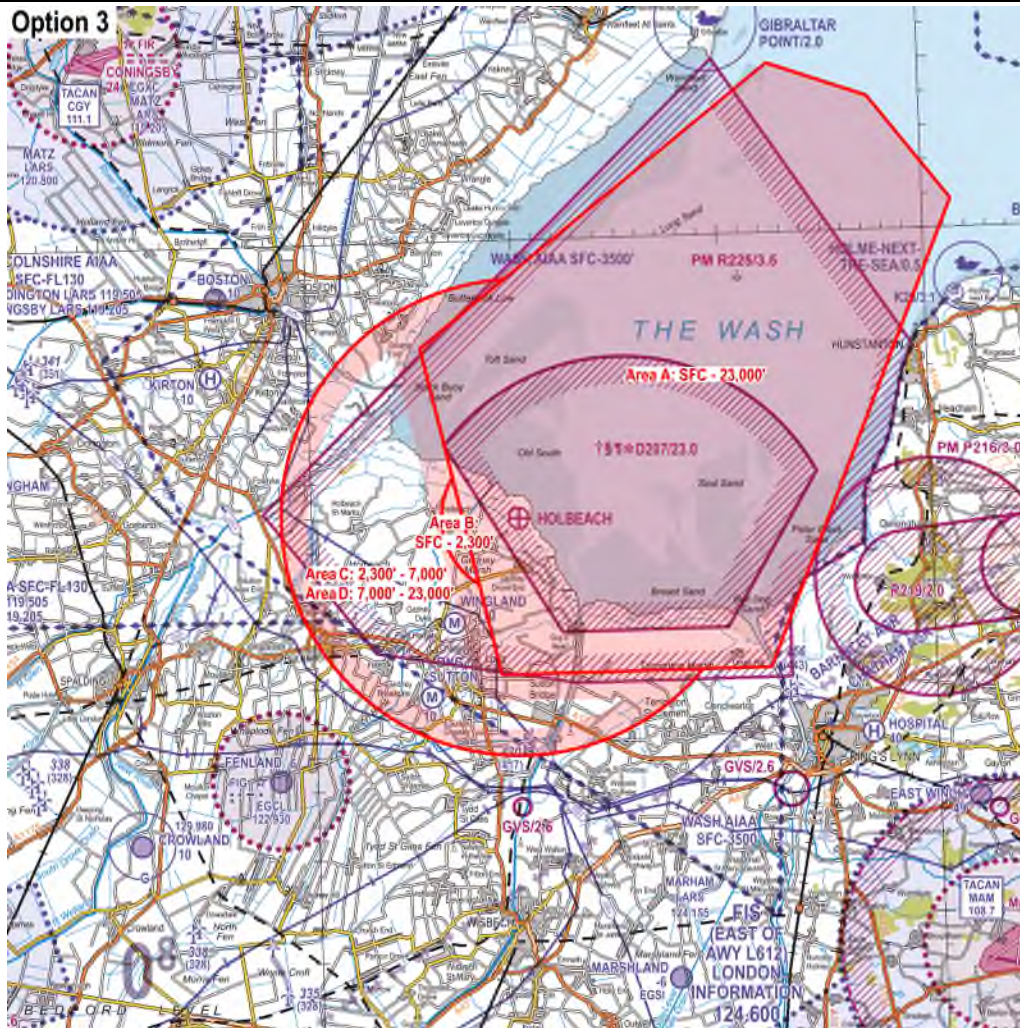
Area C, Surface – 2,300ft. Activated by NOTAM for Protector flight profiles.

Area D, 2,300ft – 7,000ft. Activated by NOTAM for Protector flight profiles.

Areas E, 7,000ft – 23,000ft. Activated by NOTAM for Protector flight profiles.

NOTE: Areas C, D & E would only be available for activation outside the hours of Area B, and vice versa.

### Option 3



Source data: CAA VFR Aeronautical Chart 1:250K

Option 3 is designed into four individual areas which may be activated under flexibly, depending on the activity taking place.

Area A, Surface - 23,000ft. Current EGD207 (Holbeach) lateral and vertical boundaries with the fast jet ingress and egress to the south and aircraft formation approach areas included in one large area. This option would make day-to-day airspace larger again, with fewer NOTAMs, following the current activation as published in the AIP

Area B, Surface – 2,300ft. Activated by NOTAM for Protector flight profiles.

Area C, 2,300ft – 7,000ft. Activated by NOTAM for Protector flight profiles.

Areas D, 7,000ft – 23,000ft. Activated by NOTAM for Protector flight profiles.

## **9 Measures to Minimise the impact on other Airspace Users**

9.1. Implementation of segregated airspace in the form of a Danger Area will provide the most efficient and tactical use of airspace, since the MOD will be able to activate individual elements of the airspace structure only as and when required by Protector, and/or other range users.

9.2. The Change Sponsor proposes the 'refreshed' Danger Area continue to be bounded by the current notified hours published in UK AIP ENR5.1 Prohibited, Restricted and Danger Areas as follows:

- Monday to Thursday 0900-1700, Friday 0900-1200.
- September to April inclusive, Tuesday and Thursday 1600 – 2200
- Activated by NOTAM.

9.3. The airspace will not be permanently active; airspace will only be activated when operations require it to be so. Activation to accommodate range activity will follow the current procedures, where a NOTAM will be promulgated at D-1<sup>13</sup>.

9.4. To ensure minimum disruption to other airspace users, a Special Use Airspace Crossing Service (SUACS) will be offered within all implemented airspace. This means that, 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 EGD207 Holbeach AWR ATC, when open.

## **10 Safety**

10.1. Holbeach AWR ATC will be present during all AWR operations, and all aircraft will be under positive ATC control from a military ATC terminal or area radar unit. Information on the status of the airspace will be available via both UHF and VHF frequencies. In addition, a Special Use Airspace Activity Information Service (SUAAIS) may be provided by London Information. Full details of how to obtain information on the status of the TDA will be provided in the activation NOTAM.

10.2. Appropriate Letters of Agreement (LOA) will be implemented between the Protector operating authority and stakeholders where necessary. Further information regarding SUACS and SUAAIS can be found within UK AIP Enroute Information ENR 1.1 – General Rules.

## **11 Utilisation of Airspace**

11.1. The Change Sponsor does not envisage the period, or frequency, of activation to increase with implementation of any of the design options.

## **12 How to Provide Feedback**

12.1. The Change Sponsor welcomes comments and feedback from interested parties relating to the above Design Options and request you provide any comments on the suitability and accuracy of the information made available within the Baseline provided in Annex D. All comments received regarding this proposal will be taken into consideration before taking the design options through to CAP 1616 Stage 3. All documentation relating

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<sup>13</sup> D-1 means that the NOTAM must be requested the day before the airspace is to be activated.

to this ACP is available on the CAA ACP Portal. The ACP identification number is ACP-2024-028.

12.2. Please provide your feedback by return of email. If you have any issue or further questions, please contact the Airspace Change Manager at [AirspaceChange2@qinetiq.com](mailto:AirspaceChange2@qinetiq.com).

**Responses must be received by 29 May 2026.**

P J DOWNER

Change Sponsor

Annexes:

D. ACP-2024-028 Baseline Scenario