



Ministry of Defence

ACP-2024-028

STAGE 2 – DEVELOP AND ASSESS

GATEWAY SUBMISSION

Roles

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Glossary

This glossary is a list of the acronyms and phrases used throughout this document. For full definitions of phrases, please refer to [CAP 1430 – UK Air Traffic Management Vocabulary](#).

Acronym	Full Meaning	Context / Use
ACP	Airspace Change Proposal	Request to permanently or temporarily alter airspace structures, classifications, routes, or procedures
AGL	Above Ground Level	The vertical height of an object measured from the immediate terrain directly beneath it
AIP	Aeronautical Information Publication	Official publication of enduring air navigation data
AIRAC	Aeronautical Information Regulation and Control cycle	28-day cycle over which changes to the Aeronautical Information Publication (AIP) are made.
AIRPROX	Aircraft Proximity	Distance between aircraft, their relative positions, and speeds are so close that the safety of the flights is compromised or a risk of collision exists
AISA	Airspace Integration Safety Argument	A structured safety case that justifies how uncrewed aircraft (UAS) or new flight entrants can safely share civil airspace alongside commercial and general aviation
AMS	Airspace Modernisation Strategy	The national programme designed to upgrade the UK's airspace infrastructure, technology, and operations to make flights quicker, quieter, cleaner, and more resilient by 2040
AMSL	Above Mean Sea Level	Standard altitude reference
ANG	Air Navigation Guidance	A statutory document issued by the government (such as the Department for Transport in the UK) to the CAA
ANSP	Air Navigation Service Provider	A public or private organization responsible for managing the safe and efficient flow of aircraft in the sky and on airport manoeuvring areas
AOI	Area of Interest	A specific geographic zone, a localized focus of visual attention, or a specialized field of study
ATC	Air Traffic Control	The ground-based service that directs aircraft to prevent collisions and maintain the orderly flow of air traffic
ATS	Air Traffic Services	The overarching system of ground-based services designed to prevent collisions, maintain the orderly flow of air traffic, and provide vital navigation and weather information to pilots.
AWR	Air Weapons Range	A designated area of land or sea, together with associated airspace, used for the live or simulated employment of weapons by military assets.
BVLOS	Beyond Visual Line of Sight	Where an uncrewed aircraft flies outside the remote pilot's direct, unaided visual range
CAA	Civil Aviation Authority	UK aviation regulator

Acronym	Full Meaning	Context / Use
CAP	Civil Aviation Publication	An official document published by the UK CAA that provides regulatory requirements, guidance, policy, or procedures related to aviation
CAS	Controlled Airspace	Airspace of defined dimensions within which air traffic control (ATC) services are provided to aircraft operating under specific rules
CTA	Control Area	A block of controlled airspace typically extending upward from a specified altitude above the earth to separate and manage en-route and terminal traffic
DA	Danger Area	Designated volume of airspace within which hazardous activity takes place
DAA	Detect and Avoid	Automated, onboard collision avoidance system systems used to sense other aircraft, obstacles, and terrain
DAATM	Defence Airspace and Air Traffic Management	MOD construct responsible for modernising and integrating military air traffic management capabilities across Defence
DASOR	Defence Aviation Safety Occurrence Report	MOD safety incident reporting system
DIO	Defence Infrastructure Organisation	The estate expert for defence, responsible for planning, building, maintaining, and servicing military infrastructure
DP	Design Principle	Provide a framework to support the development of the options to address the statement of need
eAIP	Electronic Aeronautical Information Publication	The official, digital version of the Aeronautical Information Publication (AIP)
ENR	En-Route	The section of the AIP that contains all information relevant to aircraft operations during the en-route phase of flight
FL	Flight Level	Surface of constant atmospheric pressure which is related to a specific pressure datum, 1013.2 hectopascals (hPa), and is separated from other such surfaces by specific pressure intervals
FUA	Flexible Use of Airspace	An airspace management concept built on the principle that airspace should not be designated as purely civil or purely military. Instead, it is treated as a shared continuum, where boundaries are temporary and capacity is dynamically optimized based on real-time needs
GA	General Aviation	Encompasses all civilian aircraft flights not involving scheduled airliners or military operations
HEMS	Helicopter Emergency Medical Services	Emergency helicopter ops
IFR	Instrument Flight Rules	A set of aviation regulations that allow pilots to operate properly equipped aircraft in Instrument Meteorological Conditions (IMC), where visibility is poor and pilots must navigate strictly using cockpit instrumentation and electronic signals
LOA	Letter of Agreement	Formal ATC agreement

Acronym	Full Meaning	Context / Use
LPA	Local Planning Authority	Responsible for making decisions on planning applications and guiding the development of the area
MAA	Military Aviation Authority	UK military regulator for aviation
MAMC	Military Airspace Management Cell	Co-ordinates between civilian Air Traffic Control and the Ministry of Defence to temporarily segregate airspace for military training, fast-jet operations, or low-flying exercises
MDP	Mandatory Design Principle	Design principles mandated by the CAA that the change sponsor must use
MLRSCC	Military Laser Safety Clearance	The formal authorization and certification issued by the Defence Ordnance, Munitions and Explosives (OME) Safety Regulator (DOSR) that permits the use, carriage, or testing of airborne laser systems on military aircraft
MOD	Ministry of Defence	UK defence authority
MRP	MAA Regulatory Publication	Airworthiness and safety regulations issued by the MAA to govern all defence aviation activity
MTS	Multi-Spectral Targeting System	Family of turreted, electro-optical and infrared (EO/IR) sensors used for intelligence, surveillance, reconnaissance (ISR), and precision weapon guidance
NATMAC	National Air Traffic Management Advisory Committee	A non-statutory advisory body that provides expert advice and views on major matters concerning airspace management, strategy, and policy for UK airspace
NATS	National Air Traffic Services	Provides safe and efficient air traffic services and innovative solutions to UK and international airports, airlines and governments
NERL	NATS En Route Ltd	Principal operating subsidiary of NATS
NM	Nautical Mile	Distance unit
NOTAM	Notice to Aviation	A critical alert issued by aviation authorities to notify pilots and flight personnel of real-time, temporary changes or potential hazards along a flight route or at a specific location
RA	Regulatory Article	the primary policy directives that govern military aviation activity. Issued by the Military Aviation Authority (MAA), these rules ensure that all military air operations meet strict legal and safety standard
RAF	Royal Air Force	UK air force
RPAS	Remotely Piloted Aircraft System	Aviation system encompassing the Unmanned Aerial Vehicle (UAV), the ground-based control station, and the wireless communication links that connect them
SON	Statement of Need	Used to initiate the airspace change process by identifying the need for airspace change
SUAAIS	Special Use Airspace Activity Information Service	Allows pilots to obtain real-time, airborne updates on whether local Danger Areas or restricted zones are currently active and hazardous

Acronym	Full Meaning	Context / Use
SUACS	Special Use Airspace Crossing Service	An air traffic service that allows pilots to safely fly through, or cross, active airspace (such as Danger Areas or Temporary Danger Areas) that is otherwise restricted due to military exercises, drone testing, or other hazardous activities
T&E	Test and Evaluation	The systematic collection and analysis of data to demonstrate that a system, procedure, or equipment functions safely, dependably, and in compliance with established operational and technical requirements before it goes into active service
TDA	Temporary Danger Area	Short-term hazard airspace
TRA	Temporary Reserved Area	A defined volume of airspace temporarily reserved for the exclusive use of specific users (like military training exercises or drone operations) during a determined period
UAS	Uncrewed Aircraft	The entire system required to operate an uncrewed aircraft
UHF	Ultra-High Frequency	Military comms band
UK	United Kingdom	Country context
US	United States	Country context
VFR	Visual Flight Rules	A set of aviation regulations allowing pilots to operate an aircraft in clear weather conditions
VHF	Very High Frequency	Civil comms band

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References

Ref	Document / Source	Description	Link
A	CAP 1616 – Airspace Change Process	CAA regulatory framework for airspace change proposals	https://www.caa.co.uk/publication/download/21166
B	CAA Airspace Change Portal	Official portal for ACP submissions and documentation	https://airspacechange.caa.co.uk/
C	MAA Regulatory Publications (MRP)	Military aviation regulatory framework	https://www.gov.uk/government/collections/maa-regulatory-publications
D	RA 2320 – RPAS Operation	MAA regulation governing RPAS (including BVLOS requirements)	https://www.gov.uk/government/publications/regulatory-article-ra-2320-role-specific-remotely-piloted-air-systems-rpas
E	UK AIP (Aeronautical Information Publication)	Official UK aeronautical data, including ENR 5.1 Danger Areas	https://nats-uk.ead-it.com/cms-nats/opencms/en/Publications/AIP/
F	Air Navigation Guidance 2017 (ANG)	Government guidance to the CAA on airspace policy	https://www.gov.uk/government/publications/air-navigation-guidance-2017
G	Policy for the Establishment and Operation of Special Use Airspace	CAA policy for Danger Areas and segregated airspace	https://www.caa.co.uk/publication/download/21186
H	CAP 1616i – Environmental Assessment Requirements	Guidance for environmental assessment within ACPs	https://www.caa.co.uk/publication/download/25510
I	CAP 2091 – Noise Modelling	Minimum standards for aviation noise modelling	https://www.caa.co.uk/publication/download/19322
J	Airspace Modernisation Strategy (CAP 1711)	UK strategy for airspace modernisation to 2040	https://www.caa.co.uk/publication/download/22116

Introduction

1 Executive Summary

- 1.1 This document forms part of the airspace change process as defined in Civil Aviation Publication (CAP) 1616¹. ACP-2024-028² seeks to adjust the lateral and vertical limits of EGD207 Holbeach Air Weapons Range (AWR) to accommodate the activity of a large Remotely Piloted Aircraft (RPAS), Protector RG Mk1³, as well as the Ministry of Defence (MOD)'s wider operational objectives. The Change Sponsor for this Airspace Change Proposal (ACP) is the MOD. Since the introduction of Protector, the MOD have conducted a number of airspace changes to aid accommodation of the aircraft into UK airspace. These include ACP-2019-18⁴ to enable RPAS and RAF Aerobatic Team operations out of RAF Waddington, and ACP-2023-022⁵ to enable RPAS operations to/from a nominated diversion airfield, where RAF Marham was selected. In addition, several Temporary and Trial airspace changes have also been undertaken, with the most recent being ACP-2024-014⁶ for a Temporary Danger Area (TDA) to enable RPAS Test and Evaluation Activity. Whilst providing immediate access to Holbeach AWR for Protector, the temporary airspace change also acts to inform this proposal for a permanent change to airspace.

2 Scope

- 2.1 At Stage 1 of this ACP, the Statement of Need (SON V2.0) sought to introduce an enduring volume of segregated airspace adjacent to, and potentially overlapping, the airspace currently designated as EGD207 (Holbeach) to accommodate Protector flight profiles whilst utilising the ground-based equipment in-situ. Following the Stage 1 engagement process, it became evident from stakeholder feedback 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 has been agreed.
- 2.2 It should be noted that a TDA in vicinity of EGD207 Holbeach AWR, EGD290, has been approved for Protector under the separate MOD-sponsored ACP-2024-014. 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 document forms part of Stage 2 of ACP-2024-028, to propose a permanent airspace solution at EGD207 Holbeach AWR only.

3 Statement of Need (SON)

- 3.1 Version 3 of the SON can be viewed via the CAA ACP Portal⁷. The objective of the proposed change is to establish segregated airspace to accommodate enduring routine test and

¹ [Ref A: CAP1616: Airspace Change Process](#)

² [ACP-2024-028](#)

³ [Protector RG Mk1](#)

⁴ [ACP-2019-18](#)

⁵ [ACP-2023-022](#)

⁶ [ACP-2023-014](#)

⁷ [REF B: CAA's Airspace Change Portal](#)

calibration of Protector on-board equipment. Whilst undertaking this proposed change, the Change Sponsor will consider current AWR users to ensure the airspace continues to meet wider MOD operational objectives.

4 Regulatory Requirement

- 4.1 UK military aviation activity is regulated by the Military Aviation Authority (MAA) under the MAA Regulatory Publications⁸ (MRP).
- 4.2 The operation of Protector is subject to these regulations, including Regulatory Article (RA) 2320⁹, which governs the operation of RPAS in UK airspace. RA2320 requires that Beyond Visual Line of Sight (BVLOS) RPAS operations must only be conducted where one of the following conditions is met:
 - An appropriately approved Detect and Avoid (DAA) capability enables compliance with Rules of the Air appropriate to the class of airspace, or;
 - They are 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 Air Navigation Services Provider (ANSP).
- 4.3 The activity undertaken at EGD207 Holbeach AWR, as outlined in UK AIP ENR5.1 Prohibited, Restricted and Danger Areas (DA)¹⁰. The operation of the Protector Multi-Spectral Targeting System (MTS) and associated optical systems introduces specific hazards, including laser-related risks, which necessitate containment within a defined and controlled airspace environment, and assurance that non-participating aircraft are excluded from the area of operation.
- 4.4 These regulatory and operational constraints mean that the use of segregated airspace is necessary to ensure safe and compliant operation.

5 Background

- 5.1 Protector requires access to a specific ground-based target¹¹ which, within the UK, is only located within two existing DAs, EGD207 Holbeach AWR and the EGD402 complex, situated at West Freugh, Scotland. Owing to its geographical location in proximity to the Protector main operating base, RAF Waddington, EGD207 is the selected location for these activities.
- 5.2 Figure 1 displays the current lateral boundaries of EGD207. The introduction of Protector operations introduces new operational and regulatory requirements which cannot be safely accommodated within the current airspace configuration.
- 5.3 In addition, the current airspace structure does not fully contain all AWR-related activity. As a result, aircraft undertaking hazardous operations, including high energy manoeuvres and range activity, may operate outside the notified DA in Class G airspace. In this environment, Air Traffic Service (ATS) providers are unable to establish a fully known traffic picture, increasing the risk of conflict with non-participating aircraft.

⁸ [REF C: MAA Regulatory Publications](#)

⁹ [REF D: RA 2320-Flight Procedures: role specific S2 and certified RPAS](#)

¹⁰ [REF E: UK eAIP](#)

¹¹ Utilising the airframe Multispectral Targeting System (MTS) optical equipment.

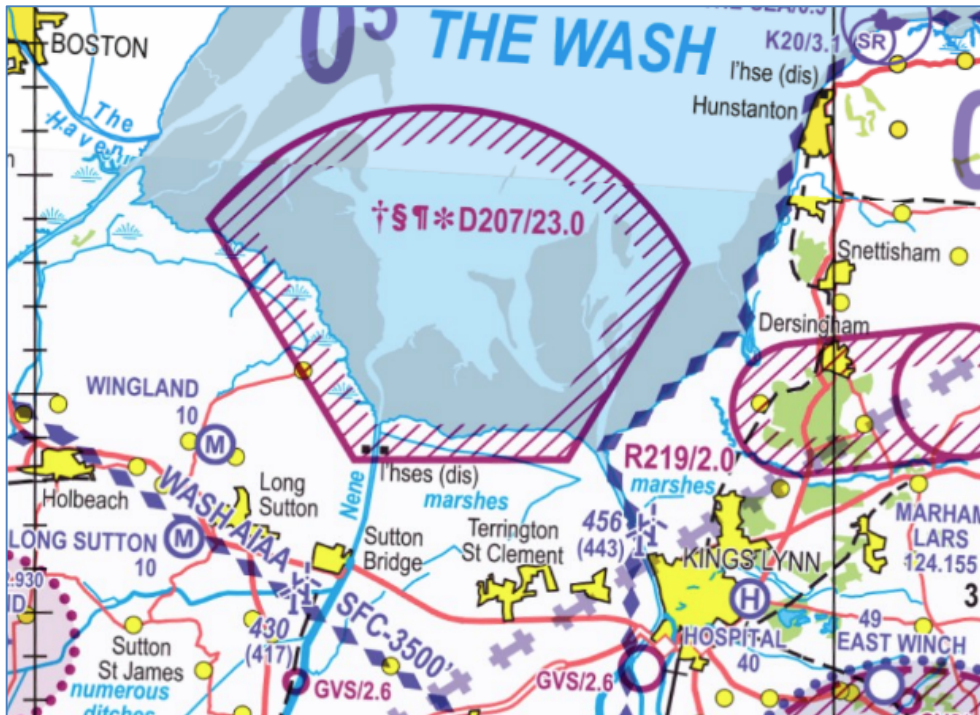


Figure 1: Local Area Map. Source data: CAA VFR Aeronautical Chart 1:250K

- 5.4 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- 2017-04612 in response to a report of AIRPROX13 between military and GA aircraft in class G airspace, but was withdrawn in Jan 2021 following a review of future requirements.

6 Consideration of Airspace Type

- 6.1 The Change Sponsor has assessed potential airspace solutions to provide the required level of safety and regulatory compliance. Controlled Airspace (CAS) has been discounted as it:

- Does not provide a mechanism to exclude non-participating traffic from hazardous activity;
- Would impose disproportionate constraints on the wider airspace network;
- Is not suited to the tactical and intermittent nature of AWR operations.

- 6.2 Procedural or non-segregated solutions have also been discounted, as they:

- Rely on see-and-avoid principles in an environment with unknown traffic participation
- Do not meet MAA requirements for BVLOS RPAS operations
- Do not adequately mitigate risks associated with laser and optical system use

¹² [ACP-2017-46](#)

¹³ [AIRPROX REPORT No 2018183](#)

6.3 In accordance with MAA regulatory requirements and CAA policy for Special Use Airspace¹⁴, the Change Sponsor proposes that segregation is provided through the modification and extension of the existing DA (EGD207). A DA provides the necessary mechanism to:

- Exclude non-participating aircraft from hazardous activity
- Ensure that all activity takes place within a known and managed traffic environment
- Enable safe operation of existing AWR users and Protector flight profiles.
- Ensure all hazardous activity is contained within defined airspace limits
- The need for aircraft to operate outside segregated airspace is removed
- The safety of both participating and non-participating airspace users is improved

7 Assumptions and constraints

7.1 The following assumptions were identified at the beginning of the proposal, or have developed throughout the process:

- Protector is fitted with a limited DAA capability only, which does not meet the requirements to fly in all classes of airspace. The working assumption is that Protector will be able to fly within the requisite portions of classes A and C airspace for transit to/from EGD207, as per current arrangements.
- An en-route LOA between National Air Traffic Service (NATS), 78 Sqn (Swanwick Military Air Traffic Control (ATC)) and the aircraft operators is in place for the management of Protector activity during transit to/from, and for egress/ingress of the TDA.
- The MOD will manage their own procedures and personnel by means of update to internal policy and procedures.
- The MOD will manage any requisite liaison with DIO HQ.

7.2 The following constraints were derived by the Change Sponsor:

- Protector requires access to a specific optical 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 and sectors of airspace that would need to be entered during transit. Therefore, EGD207 is considered the only viable location.
- The dimensions and outer limits of the proposed airspace construct to the southwest are determined by the calculated safe distances for employment of Protector MTS sensors and optical equipment, for targeting from the aircraft in the air to a fixed optical ground-based target.
- Aircraft without communication equipment are unlikely to enter a DA, as they would not be able to receive a Special Use Airspace Crossing Service (SUACS15).

¹⁴ [Ref G: CAA Policy for the Establishment and Operation of Special Use Airspace](#)

¹⁵ Further information regarding a SUACS can be found within UK Enroute Information ENR 1.1 – General Rules

8 Design Principles

- 8.1 Design Principles (DPs) were developed with stakeholders during Stage 1 of the ACP process to determine a shortlist, which will be used to inform the development of the proposed airspace design options. The adopted DPs are at Table 1.
- 8.2 The DPs are critically analysed against all the Design Options utilising the Design Option Matrix. The results of the Design Principle Evaluation can be found at Paragraph 30.

Table 1: 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 ¹⁶ .

9 Baseline Scenarios

- 9.1 CAP 1616 requires the Change Sponsor to identify baseline scenarios; future scenarios without the proposed airspace change that are developed for the following timescales:
- Year of implementation without the airspace change proposal (year 1); and;
 - years after implementation without the airspace change proposal (year 10).
- 9.2 Stakeholders were invited to provide feedback on the Baseline Scenarios document version 1.0. Further information regarding the comments received is at Paragraph 18, and version 1.1 of the Baseline can be found in [Annex A](#).

10 Design Options

- 10.1 CAP 1616f requires the Change Sponsor to provide a list of design options that address the SON and align with the criteria from the DPs. These design options are considered at:

¹⁶ [REF F: Air Navigation Guidance 2017](#)

- Year of implementation (year 1); and;
 - years after implementation (year 10).
- 10.2 Alongside the Baseline Scenarios, the Change Sponsor presented stakeholders with the initial design options to obtain feedback. More information on the observations received from stakeholders is at paragraph 17.
- 10.3 With the support of the Defence Airspace and Air Traffic Management (DAATM) team, the Change Sponsor and EGD207 Holbeach AWR ATC personnel conversed with AWR users (including Protector operators) to compile a list of requirements which, where possible, can be incorporated into the design options to meet military-wide operational objectives.
- 10.4 The Change Sponsor also engaged with aviation stakeholders previously contacted for TDA EGD290 at Holbeach AWR (ACP-2024-14), approved for activation between Jun and Aug 2026. Feedback from these stakeholders, and any additional feedback received during implementation of the TDA, may help inform the design options for the permanent solution.
- 10.5 The Change Sponsor is presenting 3 airspace design options for the proposed permanent change to airspace. The options, which are centred around the ground-based equipment in-situ at EGD207 Holbeach AWR, aspire to facilitate:
- Safe and efficient fast-jet ingress and egress to the AWR from the south, keeping fast-jet traffic contained within the confines of the DA(s);
 - A safe environment during aircraft formation approaches to AWR targets from the north;
 - Segregated Protector flight profiles whilst utilising the MTS and optical equipment with the requisite ground-based target.
- 10.6 Design options 1-3 all encompass the existing airspace of EGD207, but with additional sectorised areas. The designs incorporate both the TDA EGD290 established for Protector (at EGD207 Holbeach AWR), plus all manoeuvre envelopes requirements specified by other UK and partner forces utilising the AWR.

Proposed Airspace Design Options

11 Proposed Designs

11.1 The design options were presented to stakeholders as displayed in Figures 2 – 4.

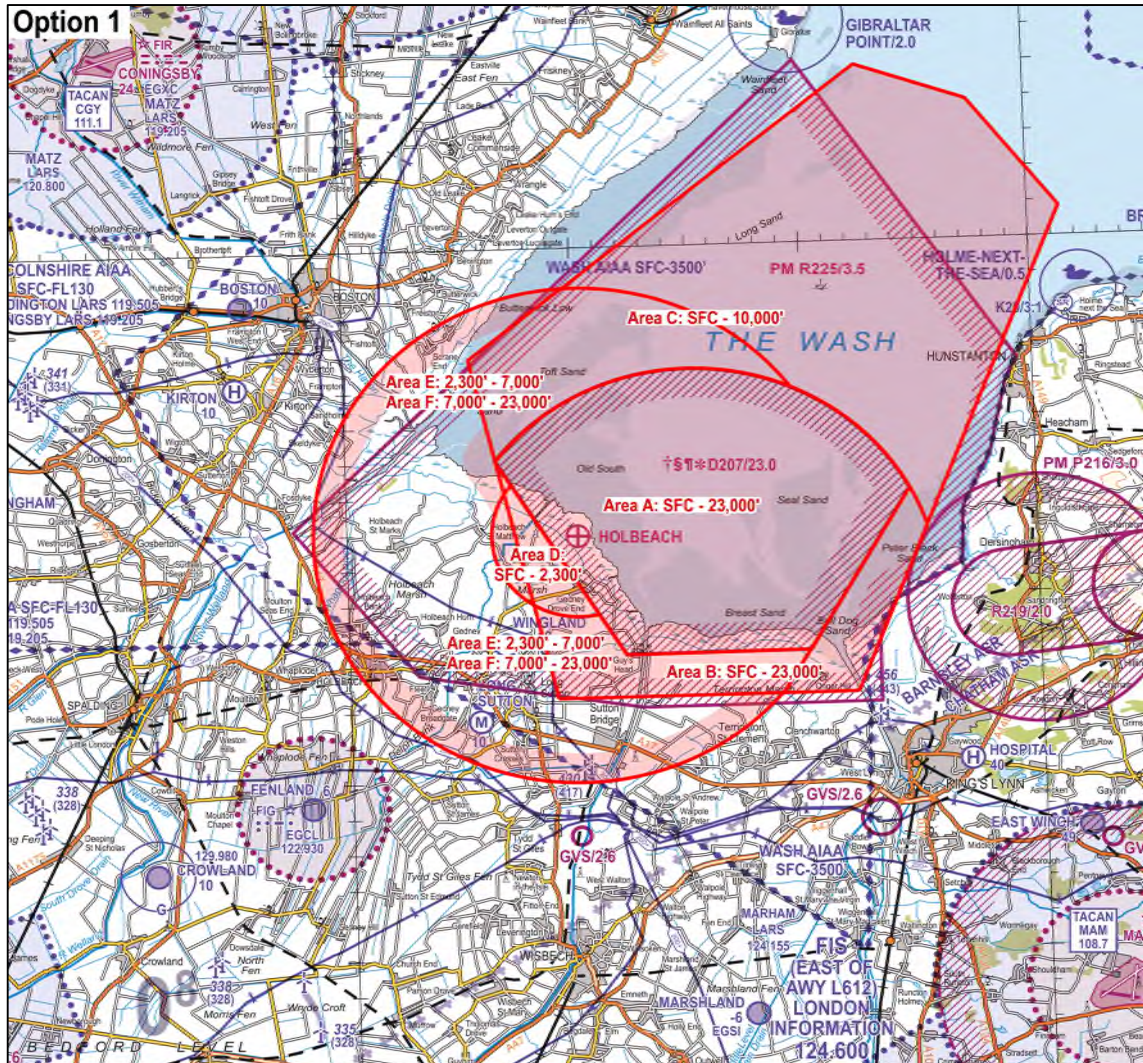


Figure 2: Design Option 1. Source: CAA VFR Aeronautical Chart 1:250K

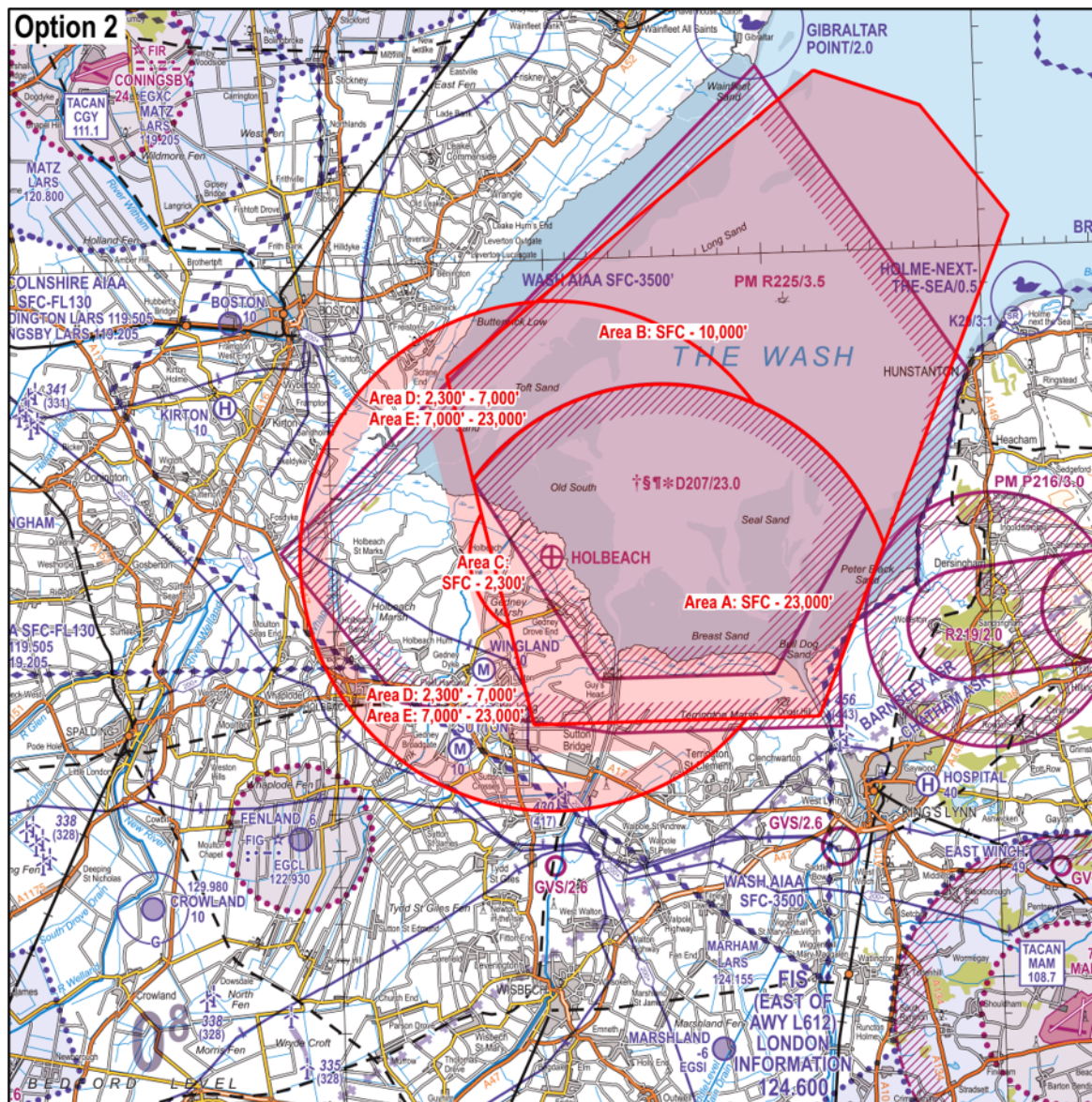


Figure 3: Design Option 2. Source: CAA VFR Aeronautical Chart 1:250K

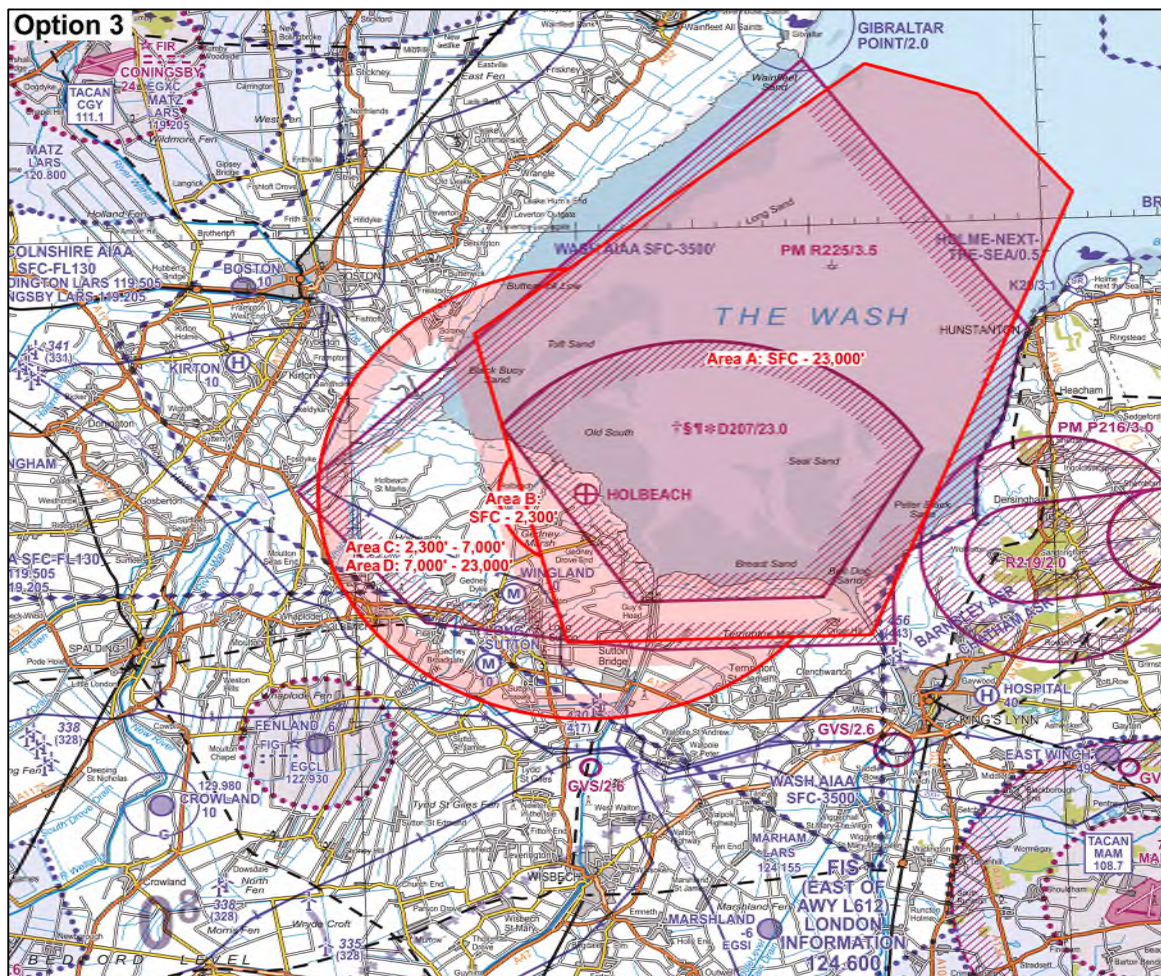


Figure 4: Design Option 3. Source: CAA VFR Aeronautical Chart 1:250K

- 11.2 During the engagement process, the British Gliding Association requested clarity on the airspace design, expressing that the labels were unclear. The Change Sponsor produced additional charts, as below in Figure 5-7, which enabled the stakeholder to provide feedback on the design options. The improved graphics will be made available to all stakeholders in Stage 3 of the ACP.

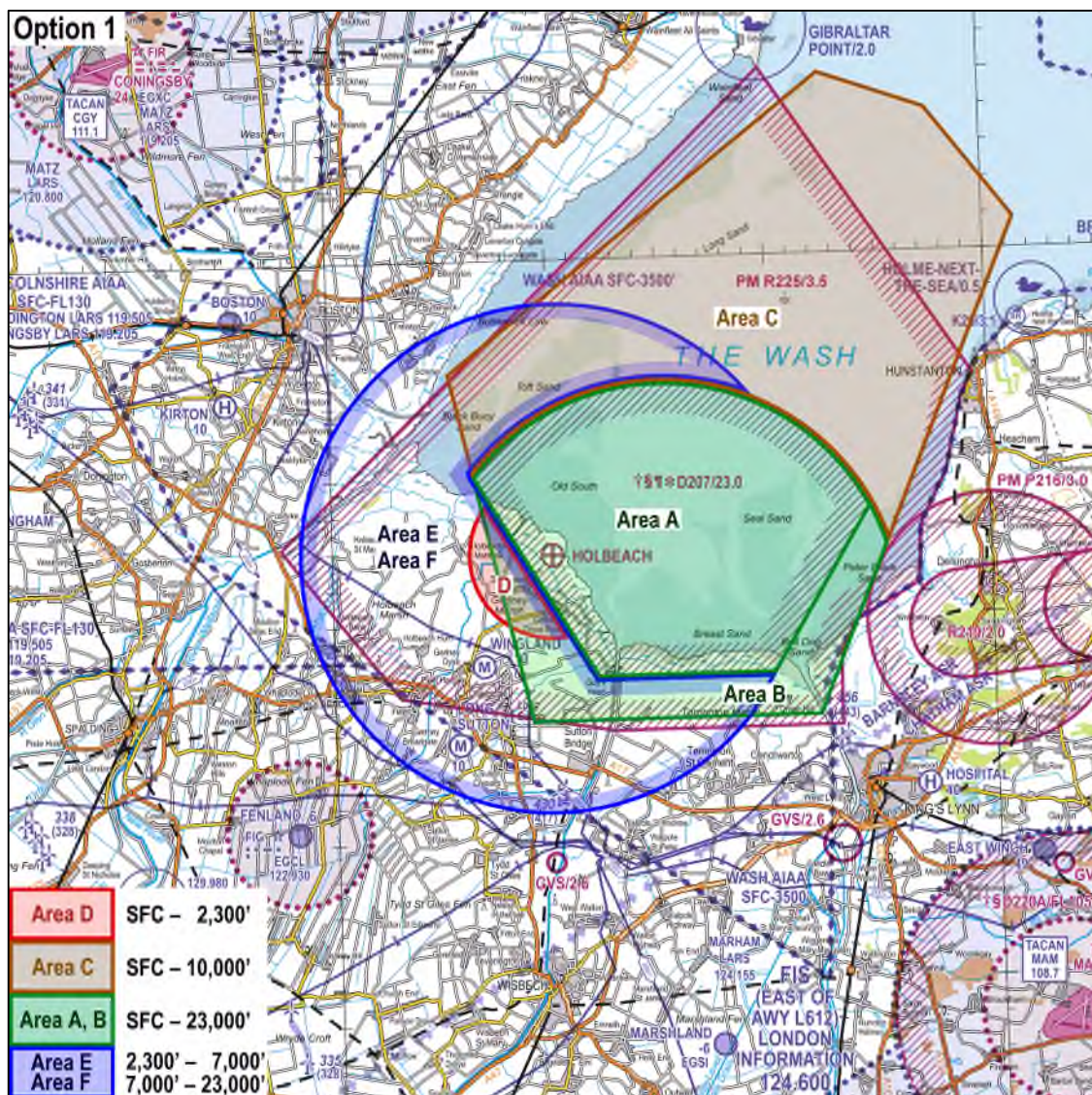


Figure 5: Design Option 1 – Updated labelling. Source: CAA VFR Aeronautical Chart 1:250K

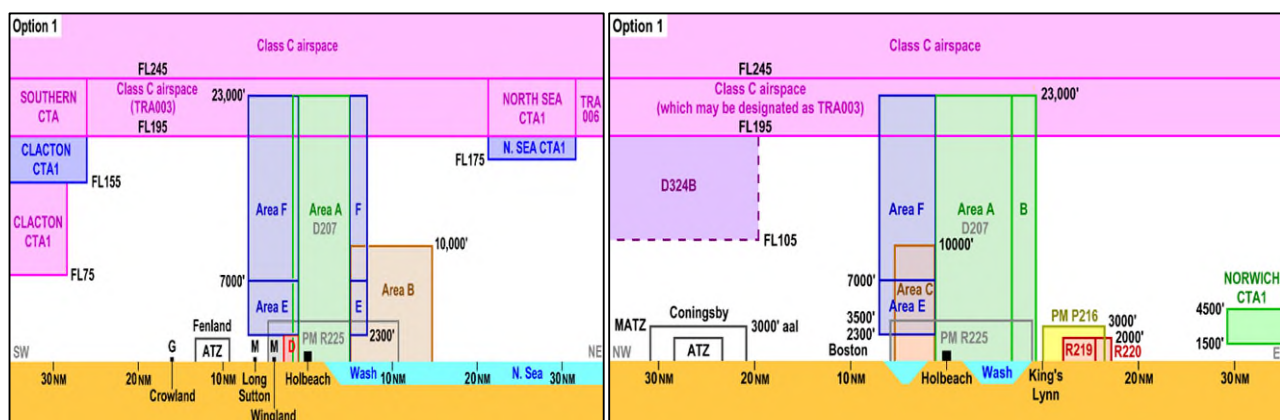


Figure 6: Design Option 1 Cross Section; NW to E and SW to NE

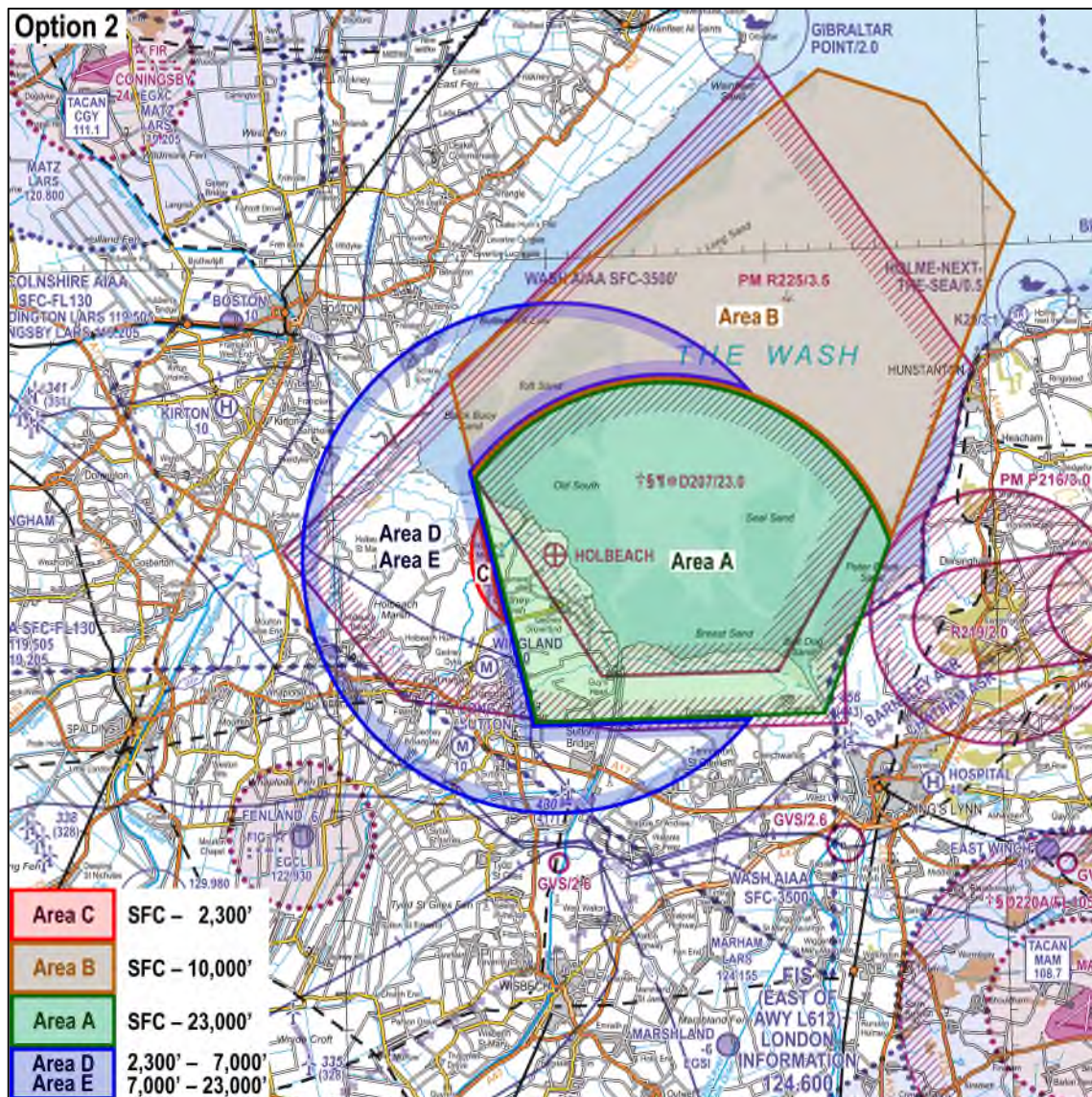


Figure 7: Design Option 2 – Updated labelling. Source: CAA VFR Aeronautical Chart 1:250K

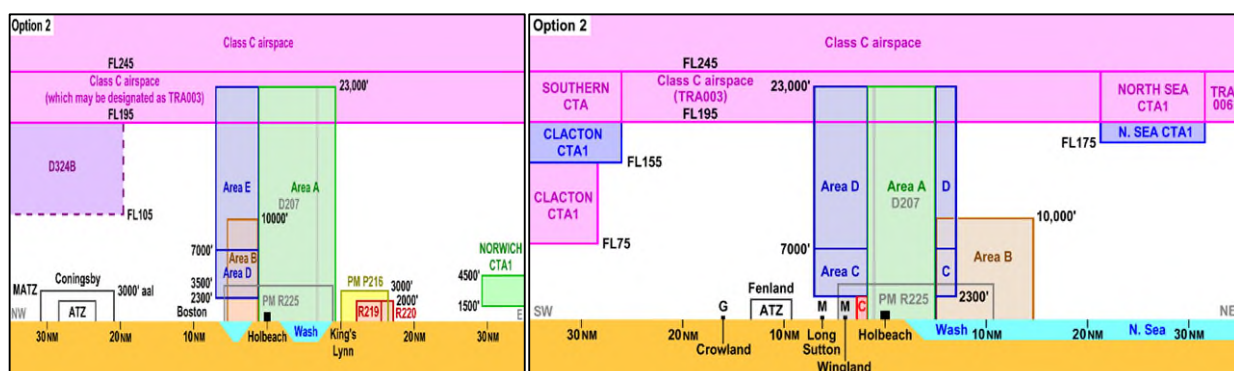
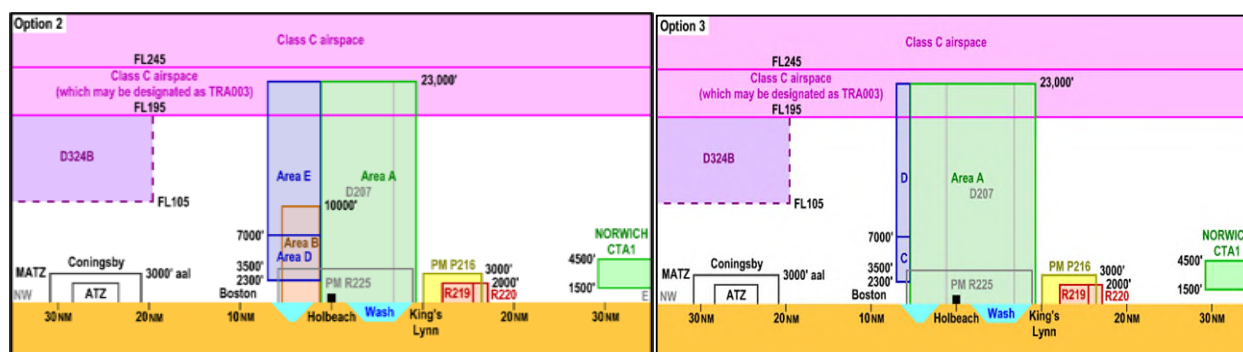
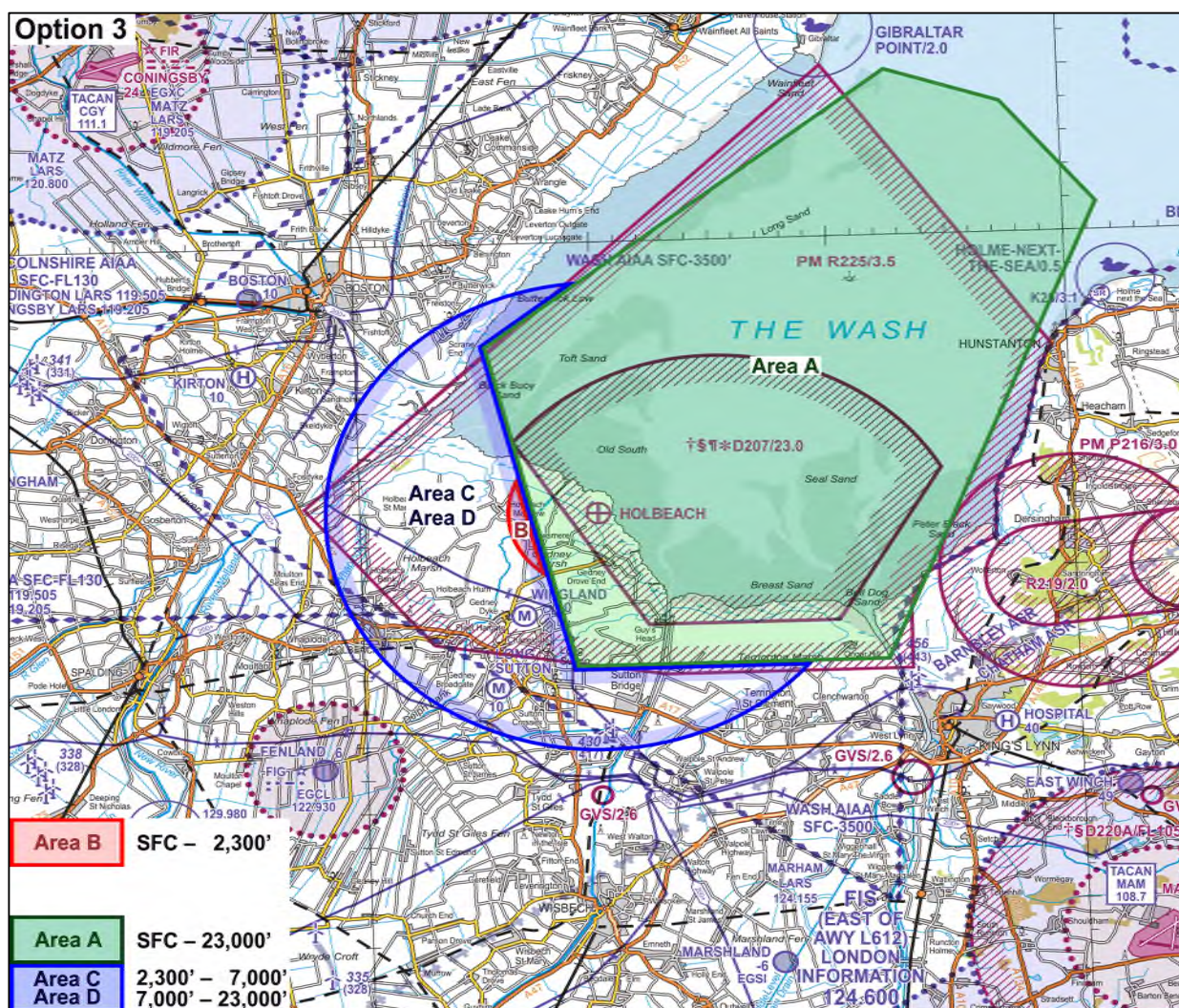


Figure 8: Design Option 2 Cross Section; NW to E and SW to NE



12 Proposed Airspace Utilisation

- 12.1 At time of engagement, the Change Sponsor was unable to provide stakeholders with a comprehensive precis of anticipated airspace utilisation. At time of writing this document, the Change Sponsor anticipates activation of proposed airspace as follows (summarised at Table 2).
- 12.2 Internal divisions are incorporated in proposed airspace to the southwest of the AWR over land (thereby splitting the airspace into 3 vertical sections) to facilitate more efficient air traffic management. This approach has been adopted in EGD324 (RAF Waddington) and EGD220 (RAF Marham), and EGD290 (TDA at Holbeach AWR) for Protector operations. This aims to reduce holding times to other airspace users and promote Flexible Use of Airspace (FUA). Thus, when an aircraft is not within a section, it would be considered inactive and other aircraft may be permitted to enter that section of airspace¹⁷. For example, should an aircraft be operating in Option 1, Area F, other aircraft may operate in Areas D and/or E. In instances where Protector is directing the MTS through multiple areas, civilian traffic will be unable to cross those areas.
- 12.3 Lateral divisions are also incorporated in Options 1 and 2 where additional areas can be activated when required for other range users, such as fast-jets and other formations. This approach further extends FUA concepts where the AWR can manage the airspace tactically with the provision of a SUACS.
- 12.4 Option 3 offers reduced NOTAM proliferation with activation either as published in the AIP, or by NOTAM; however, due to the large single area, this option is least flexible.
- 12.5 Table 2 illustrates the progression of airspace activation, depending on activity type, which demonstrates how additional areas are activated only when required. This approach ensures that the volume of segregated airspace is proportionate to the activity being conducted, supporting FUA and minimising unnecessary restriction.

Table 2: Summary of Anticipated Airspace Activation						
	Area A	Area B	Area C	Area D	Area E	Area F
Option 1	All ops	Fast jet (S)	Fast Jet (N)	Protector MTS	Protector routine/ MTS	Protector routine/ MTS
Option 2	All ops	Fast jet (N)	Protector MTS	Protector routine/ MTS	Protector routine/ MTS	N/A
Option 3	All ops	Protector MTS	Protector routine/ MTS	Protector routine/ MTS	N/A	N/A

- 12.6 The Change Sponsor does not envisage the period or frequency of activation of EGD207 combined with the new airspace to increase significantly with implementation of the ACP. A clear description of activity and management within the airspace will be presented to stakeholders at Stage 3 of the ACP.

¹⁷ Except when Protector is utilising MTS and optical equipment

13 Measures to Minimise the impact on other Airspace Users

- 13.1 Implementation of segregated airspace in the form of a DA 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 AWR users.
- 13.2 The proposed airspace will be governed using established military airspace management processes, consistent with current arrangements at Holbeach AWR. The proposed DA will continue to be bounded by the current notified hours published in UK AIP ENR5.1 Prohibited, Restricted and DAs as follows¹⁸:
- Monday to Thursday 0900-1700, Friday 0900-1200;
 - September to April inclusive, Tuesday and Thursday 1600 – 2200.
- 13.3 Activation will be time-limited and activity-based. Structured to support FUA, particularly where sectorisation is employed his approach ensures that:
- Only the minimum volume of airspace required is activated;
 - Inactive areas may be made available to other airspace users where safe.
- 13.4 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/operate within the airspace if in communication with a military ATC terminal or area radar unit. This maintains the maximum practicable level of access.
- 13.5 Section activations are via Notice to Aviation (NOTAM) no less than 24 hours prior to the scheduled flight. The Military Airspace Management Cell (MAMC) will complete DA activation.

14 Safety Measures

- 14.1 Holbeach AWR ATC will be present during all AWR operations, and aircraft operating within the DA will be in communication with a military ATC terminal or area radar unit. Full details of how to obtain information on the status of the DA will be provided in the activation NOTAM.
- 14.2 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 (SUA AIS) may be provided by London Information 124.600 MHz.
- 14.3 Appropriate Letters of Agreement (LOA) will be updated or implemented between the appropriate operating authority and affected stakeholders where necessary. Further information regarding SUACS and SUA AIS can be found within UK AIP Enroute Information ENR 1.1 – General Rules.

¹⁸ UK AIP updated via AIRAC schedule.

Stakeholder Engagement

15 Stakeholder identification and management

- 15.1 Stage 2 of the process outlined in CAP 1616 requires the Change Sponsor to share the baseline scenarios and range of airspace design options with the same stakeholders engaged with in Stage 1 and obtain feedback. After Stage 1 was finalised, the stakeholder lists were managed by the Change Sponsor to identify any changes in personnel in organisational posts to ensure all relevant parties were engaged with.
- 15.2 A total of 116 individual stakeholder organisations were contacted for the Stage 2 engagement, split into categories of NATMAC, Military, Local Aviation, Local Authority and Other Aviation stakeholders. A complete list of updated stakeholders is at Annex B and evidence of all engagement is included at Annex C.

16 Engagement methods

- 16.1 A formal period of engagement took place 30 April to 29 May 2026. Table 3 details the engagement activity undertaken. Stakeholders received the Baseline Scenarios and the Design Options documents and invited to provide feedback. Four working weeks was considered sufficient time to review the engagement material and detail a response, and was chosen to accommodate the Early May Bank Holiday (4 May) and the Spring Bank Holiday (25 May).
- 16.2 The MOD conducted engagement via Email. The Baseline Scenarios and the Design Option document were distributed to stakeholders via email, which was deemed most suitable to reach a wide range of stakeholders. An initial email was sent on 30 April 2026 with links to the documentation which was hosted on the CAA's ACP Portal. A reminder email was sent to the same distribution list on 21 May.

Table 3: Engagement Chronology			
Date	Sent/Received	Organisation	Details
30/04/2026	Sent	All stakeholders listed in Appendix B	Baseline Information & Design Options
13/05/2026	Received	British Gliding Association (Stakeholder N13)	Requested clarification on the Airspace Design.
20/05/2026	Meeting: Virtual	Holbeach AWR (Stakeholder N27)	Meeting held to discuss the Design options
20/05/2026	Received	Holbeach AWR (Stakeholder N27)	Feedback received on preferable option. Clarification provided for ATS service provision for the Baseline.
21/05/2026	Sent	British Gliding Association (Stakeholder N13)	Additional examples of the Airspace Designs provided.
21/05/2026	Received	British Gliding Association (Stakeholder N13)	Feedback received
21/05/2026	Sent	All stakeholders listed in Appendix B	Reminder Email sent
21/05/2026	Received	Wingland Airfield (Stakeholder A29)	Blank email
21/05/2026	Received	Skydive Chatteris Club Ltd (Stakeholder A7)	Requested clarification on the AOI
22/05/2026	Received	Lincs and Notts Air Ambulance (Stakeholder A17)	Contact details update

Table 3: Engagement Chronology			
Date	Sent/Received	Organisation	Details
22/05/2026	Sent	Lincs and Notts Air Ambulance (Stakeholder A17)	Confirmed contact details updated
22/05/2026	Received	Lincs and Notts Air Ambulance (Stakeholder A17)	Change Manager response acknowledged. No feedback provided.
23/05/2026	Received	East Anglia Air Ambulance (Babcock International) (Stakeholder A8)	Feedback received with option preference
27/05/2026	Received	NATS (Stakeholder N28)	Requested engagement extension
29/05/2026	Received	South Holland District Council (Stakeholder L35)	No objections raised
29/05/2026	Received	Eastern Inshore Fisheries and Conservation Authority (Stakeholder L9)	Feedback received on the use of segregated airspace and possible impacts to their statutory activity.
29/05/2026	Received	Natural England (Stakeholder L27)	Feedback received with additional questions relating to MOD activity.
01/06/2026	Meeting: Virtual	DAATM (Stakeholder N27)	Meeting held to verbally discuss feedback.
01/06/2026	Received	DAATM (Stakeholder N27)	Written feedback received on preferable option.
02/06/2026	Sent	Eastern Inshore Fisheries and Conservation Authority (Stakeholder L9)	Acknowledge stakeholders feedback and reassured access requirements will be met
2/06/2026	Sent	Wingland Airfield (Stakeholder A29)	Email sent informing sender their email was blank and invited them to resend.
02/06/2026	Received	NATS (Stakeholder N28)	Feedback received relating to the Design Options. Additional information was sought.
02/06/2026	Sent	NATS (Stakeholder N28)	Additional information was provided to NATS taken from the engagement process.
03/06/2026	Received	NATS (Stakeholder N28)	Further feedback was received regarding Design Option 3.
09/06/2026	Received	Ufly4fun (Stakeholder A28)	Feedback received and provided additional information regarding Ufly4fun activity.
10/06/2026	Sent	Ufly4fun (Stakeholder A28)	Acknowledged feedback relating to the design options.
11/06/2026	Sent	Natural England (Stakeholder L27)	Acknowledged feedback and answered questions where information was available to the public.

17 Results of Engagement

- 17.1 All engagement evidence is enclosed at Annex C. Of 116 stakeholders contacted, responses were received from 12. 11 stakeholders responded to the Stage 2 engagement process.
- 17.2 Wingland Airfield responded to the engagement email with a blank email. The Change Manager replied to the email informing the sender that their email was blank, with a signature only, and to resend their feedback; however, nothing further was received from Wingland. However, the Change Manager did receive feedback from Ufly4fun, who operate from Wingland Airfield.

18 Design Option feedback

- 18.1 Stakeholders who provided extra information or requested clarity on elements within the Design Option are detailed in Table 4.

Table 4: Design Options Feedback		
Stakeholder	Comment	Change Sponsor response
British Gliding Association (Stakeholder N13)	Requested clarification on which volumes of the proposed DA applied to labels E and F.	The Change Sponsor provided alternative images of the design options to demonstrate the multiple sectorised areas.
Skydive Chatteris Club Ltd (Stakeholder A7)	Requested clarification on the purpose of the 20nm radius AOI for the ACP.	The Change Sponsor provided an explanation of the 20nm radius AOI.
NATS (Stakeholder N28)	How close will Area A (Option 3) come to North Sea CTA-1? NATS needs to provide a buffer between fast-jet traffic and civil traffic operating within CAS.	The Change Sponsor considered the Buffer Policy, and the most northerly point from the northeast extension to North Sea CTA-1 is 5.1nm.
	How often will this (Area A Option 3) be used by fast-jet traffic. Will they be operating up to 23,000ft?	Initial feedback from the US Air Force is they wish for the northeast extension to be available from Surface to 23,000ft AMSL This area would only be used in the event on formation run ins to the targets.

19 Baseline feedback

- 19.1 Two stakeholders provided further information for the Baseline Scenarios, as detailed in Table 5. This information has now been included within the Baseline Scenarios version 1.1 at Annex A.

Table 5: Baseline Scenarios Feedback		
Stakeholder	Comment	Change Sponsor response
Holbeach AWR (Stakeholder N27)	Para 10.1 currently reads “and all aircraft will be under positive ATC control from a military ATC terminal or area radar unit”. The stakeholder requested it read “and all aircraft will be under positive ATC control, either from Holbeach AWR or from a military ATC terminal or area radar unit”.	This change was discussed during the meeting held on 01/06/2028 with DAATM and Holbeach AWR. The Change Sponsor agreed to make the change in Baseline version 1.1.
Ufly4fun (Stakeholder A28)	Ufly4fun Paramotor Training School operates from Wingland Airfield. They have between 4000 and 6000 movements annually, nearly all of which are non-radio and non-transponder. Nearly all pilots are equipped and use SafeSky ¹⁹ when departing the local airfield vicinity and flying cross country, usually along the coast towards Hunstanton and Skegness.	

20 Additional feedback

20.1 Table 6 details other comments received from the stakeholder engagement, and a Change Sponsor response.

Table 6: Additional Feedback		
Stakeholder	Comment	Change Sponsor response
East Anglian Air Ambulance (Babcock International) (Stakeholder A8)	EAAA preference regarding the proposed airspace is Option 1.	No response required.
	HEMS flight activity in the area is Surface to 1,500ft AGL.	
South Holland District Council (Stakeholder L35)	The LPA wish to raise no objection to works and to outline that they do not necessarily meet the definition of development within the Town and Country Planning Act 1990. The LPA therefore have no objections to the ACP.	No response required.
Eastern Inshore Fisheries and Conservation Authority (Stakeholder L9)	The authority has concerns regarding the proposed expansion of segregated airspace could limit or prevent the authority deploying drones thus hindering the authority's ability to fulfil their statutory responsibilities.	The Change Sponsor responded reassuring the airspace change does not aim to hinder their statutory responsibilities for monitoring and enforcing fishing regulations across The Wash. The Change Sponsor explained access agreement will be visited later in the ACP process, and
	The authority's preferred option is Option 1.	

¹⁹ A real-time flight information service for pilots

Table 6: Additional Feedback		
Stakeholder	Comment	Change Sponsor response
	The authority also notes the ACP does not include extending the vessel exclusion zone.	engagement would continue throughout.
DAATM (Stakeholder N27)	No impact raised and general support for the proposal.	No response required. Feedback discussed during the meeting held 01/06/2028.
	MOD preference for the airspace change is Option 3.	
	Noting FUA, Option 2 is second preferred option with Area B available up to 23,000ft AMSL.	
	Limiting Area B in Option 2 to 10,000ft may build in complications when holding off and separating aircraft.	
NATS (Stakeholder N28)	Option 1 have no impact to NATS NERL plc.	Change Sponsor responded with addition information as requested per Table 3.
	Option 2 is the preferred option.	
	The final design must ensure that it is more than 5nm from the boundary of CAS.	
	Due to the proximity of upper air routes above the proposed area in Option 3, NATS would like the top level of Area A to be capped at FL230 and not 23,000ft as indicated in the proposal. NATS is required to provide a 2000ft vertical buffer against overflying traffic and High Energy Manoeuvre aircraft within an active DA. By making the upper level an altitude, on low pressure days, the min overflying level would cause an increased workload for ATC which is unacceptable to NATS.	
Ufly4Fun (Stakeholder A28)	Stakeholder believes Option 1 is the only viable option and does not believe current amount of flying required airspace contiguous with the surface. Stakeholder proposes that the airspace does not start at surface level and suggests 1500ft allowing aircraft to pass underneath.	The Change Sponsor acknowledged the stakeholder's feedback. Feedback will be shared with the MoD and where possible, design option changes will be made and taken forward to Stage 3.
	Design options pushes traffic over populated areas.	
	Where Sandringham has been enlarged, a choke point has been introduced, therefore the risk of airprox in the area greatly increases.	
	Stakeholder provided information relating to their activity levels, preferred routes and noise abatement.	

Table 6: Additional Feedback		
Stakeholder	Comment	Change Sponsor response
Natural England (Stakeholder L27)	The stakeholder identified an error in the naming convention of the documents which caused some confusion.	The Change Sponsor has rectified this issue on the airspace change portal.
	It is currently uncertain as to the overall intention of the amendment of the air space usage and how the conclusion has been given that the proposal will not have Adverse Effect on Integrity on the European designated sites. Our advice is that by increasing flight and practice times from the current base levels, a Habitat Regulations Assessment will be required to assess the impact of the increased hours/training.	In accordance with para three. 69 of CAP 1616f - Guidance on Airspace Change Process for Permanent Airspace Change Proposals (Stage 2), a habitats regulations assessment early screening criteria form will be completed, as given in CAP 1616i ²⁰ , Environmental Assessment Requirements and Guidance for Airspace Change Proposals. This will determine whether there will be a significant effect on European sites and if a full Habitats Assessment is required for submission at Stage 3.
	We note that the Change Sponsor does not envisage the period, or frequency, of activation to increase with implementation of the design options. However, the Annex D Document indicates a forecast increase from 1299 hours to 2655 hours. Natural England seeks clarity on this.	The increase outlined in Annex A reflects a linear rise in EGD207 utilisation, with no associated changes to the airspace structure. It is anticipated that implementation of the design options will not affect either the frequency or duration of EGD207 activation. Consequently, the volume of military aircraft operating in the vicinity is expected to increase at the same rate as it would in the absence of any airspace change.

²⁰ [REF H: CAP 1616i: Environmental Assessment Requirements](#)

Table 6: Additional Feedback		
Stakeholder	Comment	Change Sponsor response
	Natural England is currently unable to comment specifically on the different options as there is insufficient information to inform of current usage/expected usage. We seek further explanation of the options in terms of total area usage, as the plans indicate the whole of the Wash can be utilised.	The MOD is unable to provide further detail on current or forecast usage beyond that already set out in Annex A. The Wash area is currently classified as Class G airspace, and the proposed design options retain this classification while introducing a DA. The airspace design seeks to support continued utilisation of existing AWR infrastructure at the AWR while affording enhanced protection to all aircraft. As a reminder, this airspace change proposal seeks to afford protection to current AWR users and the flight profiles which extend outside the airspace construct today. The change will provide protection to the aircraft presently using the AWR and other airspace users operating outside the AWR in Class G airspace. Activity levels are expected to remain consistent with those currently observed above.
	Natural England advises that we should be part of any stakeholder groups in which any changes to Holbeach AWR that could potentially affect the named designated sites above.	At Stage 1 of the ACP, the Statement of Need (SON V2.03) sought to introduce an enduring volume of segregated airspace adjacent to, and potentially overlapping, the airspace currently designated as EGD207 Holbeach AWR (AWR) to accommodate Protector flight profiles whilst utilizing the ground-based equipment in-situ. Appropriate stakeholders were contacted. 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 consulted with the Civil Aviation Authority (CAA) on how best to proceed: A revised SON) V3.04 has been agreed and permission to proceed to Stage 2 was provided: Natural England are included as stakeholders from Stage 2. See para two of ACP-2024-028 AIRSPACE DESIGN OPTIONS – STAKEHOLDER ENGAGEMENT v2.0.

Table 6: Additional Feedback		
Stakeholder	Comment	Change Sponsor response
	Natural England seeks further information on the implementation of the AWR at night during overwintering period and when this was put in place. We also would like to know how often this happens and what triggers the airspace to be opened.	The MOD is unable to provide a specific date for the commencement of night-time use of the AWR. While the exact origin of the current operating hours is unclear, records dating back to 2012 indicate that they have remained unchanged since that time. Additionally, the MOD cannot comment on the specific training or operational requirements that necessitate night-time activation of EGD207. Airspace activation is conducted in accordance with paragraph 9.2 of ACP-2024-028 Airspace Design Options – Stakeholder Engagement v2.0. The airspace is deactivated when not required.
	Although the consultation is focused on air usage space, there is no reference as to whether the increase in air usage will affect species on the ground. Natural England would like to see additional evidence that this will also be considered as part of the overall assessment of the proposal.	The Change Sponsor will comply with CAP 1616f, paragraph 3.61, for Stage 2. As a minimum, the initial options appraisal for each design option will include a qualitative assessment of the likely environmental impacts, encompassing both direct and consequential effects, with reference to CAP 1616i, Environmental Assessment Requirements and Guidance for Airspace Change. Paragraph 2.19 states: 'The Ministry of Defence 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 in accordance with Level 1 ... requirements' The Initial Options Appraisal will be completed at the end of Stage 2, following receipt and consideration of all stakeholder feedback.

21 Feedback considered out of scope

- 21.1 As outlined in paragraph 16.2, the Change Sponsor received a blank email from Wingland Aerodrome, however feedback was received on 10/06/2026 from Ufly4fun who operate at Wingland Aerodrome.
- 21.2 The Change Sponsor also received an engagement response from Lincs & Notts Air Ambulance who provided additional point of contact for the organisation, however, did not provide any feedback relating to the Baseline Scenario or the Design Options.

Design Principle Evaluation

22 Methodology

22.1 The Change Sponsor has developed a set of 3 design options to address the SON and to align with the DPs as agreed and presented in the engagement letter. The design options have been evaluated against the DPs.

22.2 A summary of the evaluation is at Table 7; the comprehensive analysis is at Tables 8 to 15.

Table 7: Summary of DP Evaluation								
Ref	Baseline Yr 1	Baseline Yr 10	Option 1 Yr 1	Option 1 Yr 10	Option 2 Yr 1	Option 2 Yr 10	Option 3 Yr 1	Option 3 Yr 10
DP1	Not Met	Not Met	Met	Met	Met	Met	Met	Met
DP2	Not Met	Not Met	Met	Met	Met	Met	Met	Met
DP3	Not Met	Not Met	Partially Met	Partially Met	Partially Met	Partially Met	Partially Met	Partially Met
DP6	Partially Met	Partially Met	Met	Met	Met	Met	Partially Met	Partially Met
DP5	Not Met	Not Met	Met	Met	Met	Met	Partially Met	Partially Met
DP4	Met	Met	Met	Met	Met	Met	Met	Met

23 Design Principle Evaluation Baseline 1: Year 1

Table 8: DPE Baseline 1 - Year 1		ACCEPT / REJECT	
No change to current airspace scenario; airspace situation as per Year 1 Baseline.			
Design Principle #1: The airspace change proposal must maintain a high standard of safety and should seek to enhance current levels of safety.	NOT MET	PARTIAL	MET
Does not contain all AWR activity, with participating aircraft routinely operating outside the DA in Class G airspace. This creates an unknown traffic environment increasing the risk of conflict with non-participating aircraft. As identified through historical AIRPROX/DASOR evidence and previous ACP work, the current arrangement does not adequately mitigate this risk. No change to the current airspace implies that the levels of safety would neither deteriorate nor improve, and therefore, no enhancement of current levels of safety.			
Design Principle #2: The airspace change proposal should be compatible with the requirements of the MOD.	NOT MET	PARTIAL	MET
Should an appropriate structure not be put into place, employment of Protector MTS and optical equipment operations would be unfeasible. In addition, some AWR users would continue to be unsegregated, which presents a safety risk, which is not compatible with the requirements of the MOD and allied partner nations.			
Design Principle #3: 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.	NOT MET	PARTIAL	MET
The current airspace afforded to Holbeach AWR does not consider all the requirements for Protector, therefore DP3 cannot be met.			
Design Principle #4: 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.	NOT MET	PARTIAL	MET
The current airspace afforded to Holbeach AWR is not inconsistent with the Governments environmental objectives with respect to air navigation as set out in the governments ANG 2017.			
Design Principle #5: 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 ²¹ .	NOT MET	PARTIAL	MET
The current airspace does not meet the following AMS strategic objectives: Maintaining and, where possible, improving the UK's high levels of aviation safety has priority over all other 'ends' to be achieved by airspace modernisation; Wherever possible satisfy the requirements of operators and owners of all classes of aircraft, including the accommodation of existing users (such as commercial, General Aviation, military, considering interests of national security) and new or rapidly developing users (such as remotely piloted aircraft systems, advanced air mobility, spacecraft, high-altitude platform systems);			

²¹ [REF J: CAP1711-Airspace Modernisation Strategy 2023–2040](#)

Improving efficiency.			
Design Principle #6: The airspace change proposal should consider the impacts on air navigation service providers and other aviation stakeholder such as nearby airport operators.	NOT MET	PARTIAL	MET
The current airspace at Holbeach AWR is afforded the appropriate 1nm and 5nm flight plan buffers. However, as the range is surrounded in class G airspace and fast jets currently 'spill' out the range due to its size, ANSPs are unable to provide suitable traffic information to aircraft in the vicinity due to the unknown traffic environment. The lack of known traffic environment increases the risk of AIRPROX (ACP-2017-46 refers)			

24 Design Principle Evaluation Baseline 1: Year 10

Table 9: DPE Baseline 1 - Year 10		ACCEPT / REJECT	
No change to current airspace scenario; airspace situation as per Year 1 Baseline.			
Design Principle #1: The airspace change proposal must maintain a high standard of safety and should seek to enhance current levels of safety.	NOT MET	PARTIAL	MET
Does not contain all AWR activity, with participating aircraft routinely operating outside the DA in Class G airspace. This creates an unknown traffic environment increasing the risk of conflict with non-participating aircraft. As identified through historical AIRPROX/DASOR evidence and previous ACP work, the current arrangement does not adequately mitigate this risk. No change to the current airspace implies that the levels of safety would neither deteriorate nor improve, and therefore, no enhancement of current levels of safety.			
Design Principle #2: The airspace change proposal should be compatible with the requirements of the MOD.	NOT MET	PARTIAL	MET
The Change Sponsor is unaware of any significant changes at Year 10 that would impact the evolution of this DP. Should an appropriate structure not be put into place, employment of Protector MTS and optical equipment would be unfeasible. In addition, some AWR users would continue to be unsegregated, which presents a safety risk that is not compatible with the requirements of the MoD and allied partner nations.			
Design Principle #3: 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.	NOT MET	PARTIAL	MET
The Change Sponsor is unaware of any significant changes at Year 10 that would impact the evolution of this DP. The current airspace afforded to Holbeach AWR does not consider all the requirements for Protector, therefore DP3 cannot be met.			
Design Principle #4: 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.	NOT MET	PARTIAL	MET
The Change Sponsor is unaware of any significant changes at Year 10 that would impact the evolution of this DP. The current airspace afforded to Holbeach AWR is not inconsistent with the Government's environmental objectives with respect to air navigation as set out in the Government's ANG 2017.			
Design Principle #5: 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.	NOT MET	PARTIAL	MET
The current airspace does not meet the following AMS strategic objectives: Maintaining and, where possible, improving the UK's high levels of aviation safety has priority over all other 'ends' to be achieved by airspace modernisation; Wherever possible satisfy the requirements of operators and owners of all classes of aircraft, including the accommodation of existing users (such as commercial, General Aviation, military, considering interests of national security) and new or rapidly developing users (such as remotely piloted aircraft, advanced air mobility, spacecraft, high-altitude platform systems); Improving efficiency.			

Design Principle #6: The airspace change proposal should consider the impacts on air navigation service providers and other aviation stakeholder such as nearby airport operators.	NOT MET	PARTIAL	MET
The Change Sponsor is unaware of any significant changes at Year 10 that would impact the evolution of this DP The current airspace at Holbeach AWR is afforded the appropriate 1NM and 5nm flight plan buffers. However, as the range is surrounded in class G airspace and fast jets currently 'spill' out the range due to its size, ANSPs are unable to provide suitable traffic information to aircraft in the vicinity due to the unknown traffic environment. The lack of known traffic environment increases the risk of AIRPROX (ACP-2017-46 refers)			

25 Design Principle Evaluation Option 1: Year 1

Table 10: DPE Option 1 - Year 1			ACCEPT / REJECT
Six sectorised areas which may be activated flexibly, depending on the activity taking place.			
Design Principle #1: The airspace change proposal must maintain a high standard of safety and should seek to enhance current levels of safety.	NOT MET	PARTIAL	MET
Provides sufficient segregated airspace to contain hazardous AWR activity, including high energy manoeuvres, formation operations, and Protector flight profiles. By ensuring activity remains within a defined and managed airspace volume, the design removes reliance on operations in an unknown Class G traffic environment. All aircraft within active areas will be known and under ATS control, significantly reducing the risk of conflict with non-participating traffic.			
Design Principle #2: The airspace change proposal should be compatible with the requirements of the MOD.	NOT MET	PARTIAL	MET
Option 1 provides necessary segregated airspace to facilitate current AWR users. In addition, Option 1 provides requisite airspace to accommodate employment of Protector MTS and optical equipment..			
Design Principle #3: 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.	NOT MET	PARTIAL	MET
Option 1 considers the requirements of current AWR users. In addition, Option 1 provides requisite airspace to accommodate employment of Protector MTS and optical equipment. A SUACS will be available for other aircraft transiting/operating in the airspace. Internal vertical divisions are incorporated in airspace to the west of the AWR to reduce holding times and promote FUA. Aircraft without communication equipment are unable to enter the activated DA, as they would not be able to receive a SUACS.			
Design Principle #4: 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.	NOT MET	PARTIAL	MET
The airspace proposed in Option 1 for Holbeach AWR is not inconsistent with the Governments environmental objectives with respect to air navigation as set out in the governments ANG 2017.			
Design Principle #5: 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.	NOT MET	PARTIAL	MET
Design Option 1 meets the following AMS strategic objectives: Improving the UK's high safety levels of aviation; Satisfies the requirements of operators and owners of all classes of aircraft equipped with a suitable communications system, including existing users, military and new or rapidly developing users (such as Protector); Improving efficiency.			
Design Principle #6: The airspace change proposal should consider the impacts on air navigation service providers and other aviation stakeholder such as nearby airport operators.	NOT MET	PARTIAL	MET

Following the CAA's policy for the Establishment and Operation of Special Use Airspace, Option 1 has been designed to maintain the appropriate buffer(s) from surrounding structures. At the closest point to the North Sea CTA 1, Area C is 5.2nm clear of the Class A structure. Any airspace contiguous with the surface is clear of any aerodrome and where aerodromes are in close proximity to additional boundaries, LOAs will be sought to ensure operations from such aerodromes are unaffected wherever possible.

26 Design Principle Evaluation Option 1: Year 10

Table 11: DPE Option 1 - Year 10			ACCEPT / REJECT
Six sectorised areas which may be activated flexibly, depending on the activity taking place.			
Design Principle #1: The airspace change proposal must maintain a high standard of safety and should seek to enhance current levels of safety.	NOT MET	PARTIAL	MET
Provides sufficient segregated airspace to contain hazardous AWR activity, including high energy manoeuvres, formation operations, and Protector flight profiles. By ensuring activity remains within a defined and managed airspace volume, the design removes reliance on operations in an unknown Class G traffic environment. All aircraft within active areas will be known and under ATS control, significantly reducing the risk of conflict with non-participating traffic.			
Design Principle #2: The airspace change proposal should be compatible with the requirements of the MOD.	NOT MET	PARTIAL	MET
The airspace proposed in Option 1 has been designed to provide an adequate area for Protector to carry out its flight profiles while utilising the ground-based target at Holbeach AWR. In addition, the airspace proposed has also been designed to accommodate employment of Protector MTS sensors and optical equipment.			
Design Principle #3: 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.	NOT MET	PARTIAL	MET
Option 1 considers the requirements of current AWR users. In addition, Option 1 provides requisite airspace to accommodate employment of Protector MTS and targeting equipment. A SUACS will be available for other aircraft transiting/operating in the airspace. Internal vertical divisions are incorporated in airspace to the west of the AWR to reduce holding times and promote FUA. Aircraft without communication equipment are unable to enter the activated DA, as they would not be able to receive a SUACS.			
Design Principle #4: 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.	NOT MET	PARTIAL	MET
The airspace proposed in Option 1 for Holbeach AWR is not inconsistent with the Governments environmental objectives with respect to air navigation as set out in the governments ANG 2017.			
Design Principle #5: 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.	NOT MET	PARTIAL	MET
Design Option 2 meets the following AMS strategic objectives: Improving the UK's high safety levels of aviation; Satisfies the requirements of operators and owners of all classes of aircraft equipped with a suitable communications system, including existing users, military and new or rapidly developing users (such as Protector); Improving efficiency.			

Design Principle #6: The airspace change proposal should consider the impacts on air navigation service providers and other aviation stakeholder such as nearby airport operators.	NOT MET	PARTIAL	MET
Following the CAA's policy for the Establishment and Operation of Special Use Airspace, Option 1 has been designed to maintain the appropriate buffer(s) from surrounding structures. At the closest point to the North Sea CTA 1, Area C would remain 5.2nm clear of the Class A structure. Any airspace contiguous with the surface is clear of any aerodrome and where aerodromes are in close proximity to additional boundaries, operations will be unaffected from such aerodromes operating with LOAs.			

27 Design Principle Evaluation Option 2: Year 1

Table 12: DPE Option 2: Year 1			ACCEPT / REJECT
Five individual sectorised areas which may be activated flexibly, depending on the activity taking place.			
Design Principle #1: The airspace change proposal must maintain a high standard of safety and should seek to enhance current levels of safety.	NOT MET	PARTIAL	MET
Provides sufficient segregated airspace to contain hazardous AWR activity, including high energy manoeuvres, formation operations, and Protector flight profiles. By ensuring activity remains within a defined and managed airspace volume, the design removes reliance on operations in an unknown Class G traffic environment. All aircraft within active areas will be known and under ATS control, significantly reducing the risk of conflict with non-participating traffic.			
Design Principle #2: The airspace change proposal should be compatible with the requirements of the MOD.	NOT MET	PARTIAL	MET
The Airspace proposed in Option 2 has been designed to provide an adequate area for Protector to carry out its flight profiles while utilising the ground-based target at Holbeach AWR. In addition, the airspace proposed has also been designed to accommodate employment of Protector MTS sensors and optical equipment.			
Design Principle #3: 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.	NOT MET	PARTIAL	MET
Option 2 considers the requirements of current AWR users. In addition, Option 2 provides requisite airspace to accommodate employment of Protector MTS and targeting equipment. A SUACS will be available for other aircraft transiting/operating in the airspace. Internal vertical divisions are incorporated in airspace to the west of the AWR to reduce holding times and promote FUA. Aircraft without communication equipment are unable to enter the activated DA, as they would not be able to receive a SUACS.			
Design Principle #4: 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.	NOT MET	PARTIAL	MET
The airspace proposed in Option 2 for Holbeach AWR is not inconsistent with the Governments environmental objectives with respect to air navigation as set out in the governments ANG 2017.			
Design Principle #5: 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.	NOT MET	PARTIAL	MET
Design Option 2 meets the following AMS strategic objectives: Improving the UK's high safety levels of aviation; Satisfies the requirements of operators and owners of all classes of aircraft equipped with a suitable communications system, including existing users, military and new or rapidly developing users (such as Protector); Improving efficiency.			

Design Principle #6: The airspace change proposal should consider the impacts on air navigation service providers and other aviation stakeholder such as nearby airport operators.	NOT MET	PARTIAL	MET
Following the CAA's policy for the Establishment and Operation of Special Use Airspace, Option 2 has been designed to maintain the appropriate buffer(s) from surrounding structures. At the closest point to the North Sea CTA 1, Area B is 5.2nm clear of the Class A structure. Any airspace contiguous with the surface is clear of any aerodrome and where aerodromes are in close proximity to additional boundaries, LOAs will be sought to allow unaffected operations from such aerodromes.			

28 Design Principle Evaluation Option 2: Year 10

Table 13: DPE Option 2 - Year 10			ACCEPT / REJECT
Five individual areas which may be activated flexibly, depending on the activity taking place.			
Design Principle #1: The airspace change proposal must maintain a high standard of safety and should seek to enhance current levels of safety.	NOT MET	PARTIAL	MET
Provides sufficient segregated airspace to contain hazardous AWR activity, including high energy manoeuvres, formation operations, and Protector flight profiles. By ensuring activity remains within a defined and managed airspace volume, the design removes reliance on operations in an unknown Class G traffic environment. All aircraft within active areas will be known and under ATS control, significantly reducing the risk of conflict with non-participating traffic.			
Design Principle #2: The airspace change proposal should be compatible with the requirements of the MOD.	NOT MET	PARTIAL	MET
Option 2 enhances the current level of safety ensuring necessary segregated airspace to facilitate current AWR users. In addition, Option 2 provides requisite airspace to accommodate employment of Protector MTS and optical equipment.			
Design Principle #3: 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.	NOT MET	PARTIAL	MET
Option 2 considers the requirements of current AWR users. In addition, Option 2 provides requisite airspace to accommodate employment of Protector MTS and targeting equipment. A SUACS will be available for other aircraft transiting/operating in the airspace. Internal vertical divisions are incorporated in airspace to the west of the AWR to reduce holding times and promote FUA. Aircraft without communication equipment are unable to enter the activated DA, as they would not be able to receive a SUACS.			
Design Principle #4: 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.	NOT MET	PARTIAL	MET
The airspace proposed in Option 2 for Holbeach AWR is not inconsistent with the Governments environmental objectives with respect to air navigation as set out in the governments ANG 2017.			
Design Principle #5: 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.	NOT MET	PARTIAL	MET
Design Option 2 meets the following AMS strategic objectives: Improving the UK's high safety levels of aviation; Satisfies the requirements of operators and owners of all classes of aircraft equipped with a suitable communications system, including existing users, military and new or rapidly developing users (such as Protector); Improving efficiency.			
Design Principle #6: The airspace change proposal should consider the impacts on air navigation service providers and other aviation stakeholder such as nearby airport operators.	NOT MET	PARTIAL	MET

Following the CAA's policy for the Establishment and Operation of Special Use Airspace, Option 2 has been designed to maintain the appropriate buffer(s) from surrounding structures. At the closest point to the North Sea CTA 1, Area C would remain 5.2nm clear of the Class A structure. Any airspace contiguous with the surface is clear of any aerodrome and where aerodromes are in close proximity to additional boundaries, operations will be unaffected from such aerodromes operating with LOAs.

29 Design Principle Evaluation Option 3: Year 1

Table 14: DPE Option 3 - Year 1		ACCEPT / REJECT		
Four sectorised areas which may be activated under flexibly, depending on the activity taking place.				
Design Principle #1: The airspace change proposal must maintain a high standard of safety and should seek to enhance current levels of safety.	NOT MET	PARTIAL	MET	
Provides sufficient segregated airspace to contain hazardous AWR activity, including high energy manoeuvres, formation operations, and Protector flight profiles. By ensuring activity remains within a defined and managed airspace volume, the design removes reliance on operations in an unknown Class G traffic environment. All aircraft within active areas will be known and under ATS control, significantly reducing the risk of conflict with non-participating traffic.				
Design Principle #2: The airspace change proposal should be compatible with the requirements of the MOD.	NOT MET	PARTIAL	MET	
The airspace proposed in Option 3 has been designed to provide an adequate area for Protector to carry out its flight profiles while utilising the ground-based target at Holbeach AWR. In addition, the airspace proposed has also been designed to accommodate current AWR users of UK and partner nations.				
Design Principle #3: 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.	NOT MET	PARTIAL	MET	
Option 3 considers the requirements of current AWR users. In addition, Option 3 provides requisite airspace to accommodate employment of Protector MTS and targeting equipment. A SUACS will be available for other aircraft transiting/operating in the airspace. Internal vertical divisions are incorporated in airspace to the west of the AWR to reduce holding times and promote FUA. Aircraft without communication equipment are unable to enter the activated DA, as they would not be able to receive a SUACS.				
Design Principle #4: 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.	NOT MET	PARTIAL	MET	
The airspace proposed in Option 3 for Holbeach AWR is not inconsistent with the Governments environmental objectives with respect to air navigation as set out in the governments ANG 2017.				
Design Principle #5: 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.	NOT MET	PARTIAL	MET	
Design Option 3 meets the following AMS strategic objectives: Improving the UK's high safety levels of aviation; Satisfies the requirements of operators and owners of all classes of aircraft equipped with a suitable communications system, including existing users, military and new or rapidly developing users (such as Protector); However, Option 3 consists of a single large area for day to day AWR activity. The smaller areas at Options 1 and 2 are available for activation depending on activity but are replaced in Option 3 by one large area. This does not demonstrate the concept of Flexible Use of Airspace (FUA). Aircraft without communication are unable to enter the activated DA, as they would not be able to receive a SUACS.				

Design Principle #6: The airspace change proposal should consider the impacts on air navigation service providers and other aviation stakeholder such as nearby airport operators.	NOT MET	PARTIAL	MET
Following the CAA's policy for the Establishment and Operation of Special Use Airspace, Option 2 has been designed to maintain the appropriate buffer(s) from surrounding structures. At the closest point to the North Sea CTA 1, Area C would remain 5.2nm clear of the Class A structure. Any airspace contiguous with the surface is clear of any aerodrome and where aerodromes are in close proximity to additional boundaries, operations will be unaffected from such aerodromes operating with LOAs. While the option supports safe operations and accommodates required users, the use of a large, less flexible airspace volume does not align with the principles of proportionality and Flexible Use of Airspace.			

30 Design Principle Evaluation Option 3: Year 10

Table 15: DPE Option 3 - Year 10		ACCEPT / REJECT	
Four individual areas which may be activated under flexibly, depending on the activity taking place			
Design Principle #1: The airspace change proposal must maintain a high standard of safety and should seek to enhance current levels of safety.	NOT MET	PARTIAL	MET
Provides sufficient segregated airspace to contain hazardous AWR activity, including high energy manoeuvres, formation operations, and Protector flight profiles. By ensuring activity remains within a defined and managed airspace volume, the design removes reliance on operations in an unknown Class G traffic environment. All aircraft within active areas will be known and under ATS control, significantly reducing the risk of conflict with non-participating traffic.			
Design Principle #2: The airspace change proposal should be compatible with the requirements of the MOD.	NOT MET	PARTIAL	MET
The airspace proposed in Option 3 has been designed to provide an adequate area for Protector to carry out its flight profiles while utilising the ground-based target at Holbeach AWR. In addition, the airspace proposed has also been designed to accommodate current AWR users of UK and partner nations.			
Design Principle #3: 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.	NOT MET	PARTIAL	MET
Option 3 considers the requirements of current AWR users. In addition, Option 3 provides requisite airspace to accommodate employment of Protector MTS and targeting equipment. A SUACS will be available for other aircraft transiting/operating in the airspace. Internal vertical divisions are incorporated in airspace to the west of the AWR to reduce holding times and promote FUA. Aircraft without communication equipment are unable to enter the activated DA, as they would not be able to receive a SUACS.			
Design Principle #4: 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.	NOT MET	PARTIAL	MET
The airspace proposed in Option 3 for Holbeach AWR is not inconsistent with the Governments environmental objectives with respect to air navigation as set out in the governments ANG 2017.			
Design Principle #5: 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.	NOT MET	PARTIAL	MET
Design Option 3 meets the following AMS strategic objectives: Improving the UK's high safety levels of aviation; Satisfies the requirements of operators and owners of all classes of aircraft equipped with a suitable communications system, including existing users, military and new or rapidly developing users (such as Protector);			

However, Option 3 consists of a single large area for day to day AWR activity. The smaller areas at Options 1 and 2 are available for activation depending on activity but are replaced in Option 3 by one large area. This does not demonstrate the concept of Flexible Use of Airspace (FUA).			
Design Principle #6: The airspace change proposal should consider the impacts on air navigation service providers and other aviation stakeholder such as nearby airport operators.	NOT MET	PARTIAL	MET
Following the CAA's policy for the Establishment and Operation of Special Use Airspace, Option 2 has been designed to maintain the appropriate buffer(s) from surrounding structures. At the closest point to the North Sea CTA 1, Area C would remain 5.2nm clear of the Class A structure. Any airspace contiguous with the surface is clear of any aerodrome and where aerodromes are in close proximity to additional boundaries, operations will be unaffected from such aerodromes operating with LOAs. While the option supports safe operations and accommodates required users, the use of a large, less flexible airspace volume does not align with the principles of proportionality and Flexible Use of Airspace.			

31 Design Principle Evaluation conclusion

31.1 Following engagement at Stage 2, four stakeholders identified Option 1 as their preferred design. One stakeholder stated that Option 2 was their preference, with another stakeholder also indicating this option would be preferential, but with changes. Option 3 was preferred by one stakeholder.

31.2 Evaluation of the baseline and design options at Stage 2 concluded that both Option 1 and Option 2 are considered viable and broadly comparable in terms of safety performance, regulatory compliance and environmental impact. However, there are emerging differences which will be explored in Stage 3: Option 3, while safe, has been discounted as it relies on a larger, less flexible airspace volume, does not sufficiently support FUA principles and would result in disproportionate impact on other airspace users.

Option 1:

- Provides the greatest degree of sectorisation and flexibility
- Offers potential to minimise the volume of active airspace at any one time
- May provide enhanced opportunities for tactical access by other airspace users

Option 2:

- Provides a slightly simplified airspace structure
- May reduce complexity in airspace management and pilot understanding
- May offer operational efficiencies for certain user groups

31.3 In summary:

- The baseline has been rejected on safety and regulatory grounds
- All options improve safety, but differ in proportionality and flexibility
- Option 3 has been discounted due to its failure to sufficiently support FUA principles
- Options 1 and 2 are taken forward as the preferred options

Initial Options Appraisal

Table 16: Initial Options appraisal							
Group	Impact	Option 1: Year 1	Option 1: Year 10	Option 2: Year 1	Option 2: Year 10	Baseline: Year 1	Baseline: Year 10
Communities	Noise	No anticipated change in noise levels. The number and type of civil aircraft are expected to remain unchanged. There may be redistribution of noise if GA do not / cannot take advantage of a crossing service (e.g. SUACS) to achieve a direct routing. The position and dimensions of Areas A, B & C could result in aircraft utilising the SUACS or crossing the Wash further NE over low population areas. Activation of areas D, E & F will be infrequent and only for Protector ops, with no change to the current flow of aircraft below 2,300ft AGL. Above 2,300ft AGL the vertical split between areas E & F facilitates the option of a SUACS when an area is not occupied by Protector, thus minimising any impact to noise levels caused by GA.	No anticipated significant change in noise levels, which will vary slightly in line with air traffic levels. Estimated Class G airspace traffic levels in this area are likely to be generated by regional military operations, together with GA traffic, and will be dependent on various economic and social factors that are impossible to predict. The position and dimensions of Areas A, B & C could result in aircraft utilising the SUACS or crossing the Wash further NE over low population areas. Activation of areas D, E & F will be infrequent and only for Protector ops, with no change to the current flow of aircraft below 2,300ft AGL. Above 2,300ft AGL the vertical split between areas E & F facilitates the option of a SUACS when an area is not occupied by Protector, thus minimising any impact	No anticipated change in noise levels. The number and type of civil aircraft are expected to remain unchanged. There may be redistribution of noise if GA do not / cannot take advantage of a crossing service (e.g. SUACS) to achieve a direct routing. The position and dimensions of Areas A & B could result in aircraft utilising the SUACS or crossing the Wash further NE over low population areas. Activation of areas C, D & E will be infrequent and only for Protector ops, with no change to the current flow of aircraft below 2,300ft AGL. Above 2,300ft AGL the vertical split between areas D & E facilitates the option of a SUACS when an area is not occupied by Protector, thus minimising any impact to noise levels caused by GA.	No anticipated significant change in noise levels, which will vary slightly in line with air traffic levels. Estimated Class G airspace traffic levels in this area are likely to be generated by regional military operations, together with GA traffic, and will be dependent on various economic and social factors that are impossible to predict. The position and dimensions of Areas A & B could result in aircraft utilising the SUACS or crossing the Wash further NE over low population areas. Activation of areas C, D & E will be infrequent and only for Protector ops, with no change to the current flow of aircraft below 2,300ft AGL. Above 2,300ft AGL the vertical split between areas D & E facilitates the option of a SUACS when an area is not occupied by Protector, thus minimising any impact	No change in noise levels since the airspace and associated activity would remain unchanged.	No anticipated significant change in noise levels, which may fluctuate slightly in line with air traffic levels. Estimated Class G airspace traffic levels in this area are likely to be generated by regional military operations, together with GA traffic, and will be dependent on various economic and social factors that are impossible to predict.

Table 16: Initial Options appraisal							
Group	Impact	Option 1: Year 1	Option 1: Year 10	Option 2: Year 1	Option 2: Year 10	Baseline: Year 1	Baseline: Year 10
			to noise levels caused by GA.		to noise levels caused by GA.		

Communities	Local Air Quality	No anticipated change in local air quality. The number and type of civil aircraft are expected to remain unchanged. There may be negligible changes to air quality by redistribution if GA do not / cannot take advantage of a crossing service (e.g. SUACS) to achieve a direct routing. The position and dimensions of Areas A, B & C could result in aircraft utilising the SUACS or crossing the Wash further NE over low population areas. Activation of areas D, E & F will be infrequent and only for Protector ops, with no change to the current flow of aircraft below 2,300ft AGL. Above 2,300ft AGL the vertical split between areas E & F facilitates the option of a SUACS when an area is not occupied by Protector, thus minimising any impact to local air quality from GA.	No anticipated significant change in air quality, which will vary slightly in line with air traffic levels. Estimated Class G airspace traffic levels in this area are likely to be generated by regional military operations, together with GA traffic, and will be dependent on various economic and social factors that are impossible to predict. There may be negligible changes to air quality by redistribution if GA do not / cannot take advantage of a crossing service (e.g. SUACS) to achieve a direct routing. The position and dimensions of Areas A, B & C could result in aircraft utilising the SUACS or crossing the Wash further NE over low population areas. Activation of areas D, E & F will be infrequent and only for Protector ops, with no change to the current flow of aircraft below 2,300ft AGL. Above 2,300ft AGL the vertical split between areas E & F facilitates the option of a SUACS when an area is not occupied by Protector, thus minimising any impact to local air quality from GA.	No anticipated change in local air quality. The number and type of civil aircraft are expected to remain unchanged. There may be negligible changes to air quality by redistribution if GA do not / cannot take advantage of a crossing service (e.g. SUACS) to achieve a direct routing. The position and dimensions of Areas A & B could result in aircraft utilising the SUACS or crossing the Wash further NE over low population areas. Activation of areas C, D & E will be infrequent and only for Protector ops, with no change to the current flow of aircraft below 2,300ft AGL. Above 2,300ft AGL the vertical split between areas D & E facilitates the option of a SUACS when an area is not occupied by Protector, thus minimising any impact to local air quality from GA.	No anticipated significant change in air quality, which will vary slightly in line with air traffic levels. Estimated Class G airspace traffic levels in this area are likely to be generated by regional military operations, together with GA traffic, and will be dependent on various economic and social factors that are impossible to predict. There may be negligible changes to air quality by redistribution if GA do not / cannot take advantage of a crossing service (e.g. SUACS) to achieve a direct routing. The position and dimensions of Areas A & B could result in aircraft utilising the SUACS or crossing the Wash further NE over low population areas. Activation of areas C, D & E will be infrequent and only for Protector ops, with no change to the current flow of aircraft below 2,300ft AGL. Above 2,300ft AGL the vertical split between areas D & E facilitates the option of a SUACS when an area is not occupied by Protector, thus minimising any impact to local air quality from GA.	No change in air quality since the airspace and associated activity would remain unchanged.	No anticipated significant change in air quality, which may fluctuate slightly in line with air traffic levels. Estimated Class G airspace traffic levels in this area are likely to be generated by regional military operations, together with GA traffic, and will be dependent on various economic and social factors that are impossible to predict.
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Wider society	Greenhouse gas emissions	No anticipated change in greenhouse gas emissions. The number and type of civil aircraft are expected to remain unchanged. There may be negligible redistribution of greenhouse gas emissions if GA do not / cannot take advantage of a crossing service (e.g. SUACS) to achieve a direct routing. The position and dimensions of Areas A, B & C could result in aircraft utilising the SUACS or crossing the Wash further NE over low population areas. Activation of areas D, E & F will be infrequent and only for Protector ops, with no change to the current flow of aircraft below 2,300ft AGL. Above 2,300ft AGL the vertical split between areas E & F facilitates the option of a SUACS when an area is not occupied by Protector, thus minimising any change to greenhouse gas emissions from GA.	No anticipated significant change in greenhouse gas emissions. Estimated Class G airspace traffic levels in this area are likely to be generated by regional military operations, together with GA traffic, and will be dependent on various economic and social factors that are impossible to predict. There may be negligible redistribution of greenhouse gas emissions if GA do not / cannot take advantage of a crossing service (e.g. SUACS) to achieve a direct routing. The position and dimensions of Areas A, B & C could result in aircraft utilising the SUACS or crossing the Wash further NE over low population areas. Activation of areas D, E & F will be infrequent and only for Protector ops, with no change to the current flow of aircraft below 2,300ft AGL. Above 2,300ft AGL the vertical split between areas E & F facilitates the option of a SUACS when an area is not occupied by Protector, thus minimising any change to greenhouse gas emissions from GA.	No anticipated change in greenhouse gas emissions. The number and type of civil aircraft are expected to remain unchanged. There may be negligible redistribution of greenhouse gas emissions if GA do not / cannot take advantage of a crossing service (e.g. SUACS) to achieve a direct routing. The position and dimensions of Areas A & B could result in aircraft utilising the SUACS or crossing the Wash further NE over low population areas. Activation of areas C, D & E will be infrequent and only for Protector ops, with no change to the current flow of aircraft below 2,300ft AGL. Above 2,300ft AGL the vertical split between areas D & E facilitates the option of a SUACS when an area is not occupied by Protector, thus minimising any change to greenhouse gas emissions from GA.	No anticipated significant change in greenhouse gas emissions. Estimated Class G airspace traffic levels in this area are likely to be generated by regional military operations, together with GA traffic, and will be dependent on various economic and social factors that are impossible to predict. There may be negligible redistribution of greenhouse gas emissions if GA do not / cannot take advantage of a crossing service (e.g. SUACS) to achieve a direct routing. The position and dimensions of Areas A & B could result in aircraft utilising the SUACS or crossing the Wash further NE over low population areas. Activation of areas C, D & E will be infrequent and only for Protector ops, with no change to the current flow of aircraft below 2,300ft AGL. Above 2,300ft AGL the vertical split between areas D & E facilitates the option of a SUACS when an area is not occupied by Protector, thus minimising any change to greenhouse gas emissions from GA.	No change in greenhouse gas emissions since the airspace and associated activity would remain unchanged.	No anticipated significant change in greenhouse gas emissions, which may fluctuate slightly in line with air traffic levels. Estimated Class G airspace traffic levels in this area are likely to be generated by regional military operations, together with GA traffic, and will be dependent on various economic and social factors that are impossible to predict.
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Table 16: Initial Options appraisal							
Group	Impact	Option 1: Year 1	Option 1: Year 10	Option 2: Year 1	Option 2: Year 10	Baseline: Year 1	Baseline: Year 10
Wider society	Tranquillity	No anticipated change to tranquillity. The number and type of civil aircraft are expected to remain unchanged. There may be negligible changes to tranquillity due to rerouting if GA do not / cannot take advantage of a crossing service (e.g. SUACS) to achieve a direct route. The position and dimensions of Areas A, B & C could result in aircraft utilising the SUACS or crossing the Wash further NE over low population areas. Activation of areas D, E & F will be infrequent and only for Protector ops, with no change to the current flow of aircraft below 2,300ft AGL. Above 2,300ft AGL the vertical split between areas E & F facilitates the option of a SUACS when an area is not occupied by Protector, thus minimising any change to tranquillity from GA activity.	No anticipated significant change in tranquillity. Estimated Class G airspace traffic levels in this area are likely to be generated by regional military operations, together with GA traffic, and will be dependent on various economic and social factors that are impossible to predict. There may be negligible changes to tranquillity due to rerouting if GA do not / cannot take advantage of a crossing service (e.g. SUACS) to achieve a direct route. The position and dimensions of Areas A, B & C could result in aircraft utilising the SUACS or crossing the Wash further NE over low population areas. Activation of areas D, E & F will be infrequent and only for Protector ops, with no change to the current flow of aircraft below 2,300ft AGL. Above 2,300ft AGL the vertical split between areas E & F facilitates the option of a SUACS when an area is not occupied by Protector, thus	No anticipated change to tranquillity. The number and type of civil aircraft are expected to remain unchanged. There may be negligible changes to tranquillity due to rerouting if GA do not / cannot take advantage of a crossing service (e.g. SUACS) to achieve a direct route. The position and dimensions of Areas A & B could result in aircraft utilising the SUACS or crossing the Wash further NE over low population areas. Activation of areas C, D & E will be infrequent and only for Protector ops, with no change to the current flow of aircraft below 2,300ft AGL. Above 2,300ft AGL the vertical split between areas D & E facilitates the option of a SUACS when an area is not occupied by Protector, thus minimising any change to tranquillity from GA activity.	No anticipated significant change in tranquillity. Estimated Class G airspace traffic levels in this area are likely to be generated by regional military operations, together with GA traffic, and will be dependent on various economic and social factors that are impossible to predict. There may be negligible changes to tranquillity due to rerouting if GA do not / cannot take advantage of a crossing service (e.g. SUACS) to achieve a direct route. The position and dimensions of Areas A & B could result in aircraft utilising the SUACS or crossing the Wash further NE over low population areas. Activation of areas C, D & E will be infrequent and only for Protector ops, with no change to the current flow of aircraft below 2,300ft AGL. Above 2,300ft AGL the vertical split between areas D & E facilitates the option of a SUACS when an area is not occupied by	No change in tranquillity since the airspace and associated activity would remain unchanged.	No anticipated significant change in tranquillity, the level of which may fluctuate slightly in line with air traffic levels. Estimated Class G airspace traffic levels in this area are likely to be generated by regional military operations, together with GA traffic, and will be dependent on various economic and social factors that are impossible to predict.

Table 16: Initial Options appraisal							
Group	Impact	Option 1: Year 1	Option 1: Year 10	Option 2: Year 1	Option 2: Year 10	Baseline: Year 1	Baseline: Year 10
			minimising any change to tranquillity from GA activity.		Protector, thus minimising any change to tranquillity from GA activity.		
Wider society	Biodiversity	No anticipated impact to biodiversity. The number and type of civil aircraft are expected to remain unchanged. There may be a slight reduction in the effect on biodiversity in the footprint of the DA if GA do not / cannot take advantage of a crossing service (e.g. SUACS) to achieve a direct routing. This would reduce the volume of civilian aircraft overflying the area whilst avoiding the DA. Military traffic levels are anticipated to remain the same, thus no impact to biodiversity.	No anticipated significant impact to biodiversity. Estimated Class G airspace traffic levels in this area are likely to be generated by regional military operations, together with GA traffic, and will be dependent on various economic and social factors that are impossible to predict. There may be a slight reduction in the effect on biodiversity in the footprint of the DA if GA do not / cannot take advantage of a crossing service (e.g. SUACS) to achieve a direct routing. This would reduce the volume of civilian aircraft overflying the area whilst avoiding the DA. Military traffic levels are anticipated to remain the same, thus no impact to biodiversity.	No anticipated impact to biodiversity. The number and type of civil aircraft are expected to remain unchanged. There may be a slight reduction in the effect on biodiversity in the footprint of the DA if GA do not / cannot take advantage of a crossing service (e.g. SUACS) to achieve a direct routing. This would reduce the volume of civilian aircraft the area whilst avoiding the DA. Military traffic levels are anticipated to remain the same, thus no impact to biodiversity.	No anticipated significant impact to biodiversity. Estimated Class G airspace traffic levels in this area are likely to be generated by regional military operations, together with GA traffic, and will be dependent on various economic and social factors that are impossible to predict. There may be a slight reduction in the effect on biodiversity in the footprint of the DA if GA do not / cannot take advantage of a crossing service (e.g. SUACS) to achieve a direct routing. This would reduce the volume of civilian aircraft overflying the area whilst avoiding the DA. Military traffic levels are anticipated to remain the same, thus no impact to biodiversity.	No change in biodiversity since the airspace and associated activity would remain unchanged.	No anticipated significant change in biodiversity, which could alter slightly in reaction to air traffic levels. Estimated Class G airspace traffic levels in this area are likely to be generated by regional military operations, together with GA traffic, and will be dependent on various economic and social factors that are impossible to predict.
Wider society	Capacity/resilience	N/A	N/A	N/A	N/A	N/A	N/A

Table 16: Initial Options appraisal							
Group	Impact	Option 1: Year 1	Option 1: Year 10	Option 2: Year 1	Option 2: Year 10	Baseline: Year 1	Baseline: Year 10
General Aviation	Access	Potential small impact to GA on access if do not / cannot take advantage of a crossing service (e.g. SUACS) to achieve a direct routing. The position and dimensions of Areas A, B & C could result in aircraft taking a longer route to avoid the DA. Activation of areas D, E & F will be infrequent and only for Protector ops, with no change to the current flow of aircraft below 2,300ft AGL. Above 2,300ft AGL the vertical split between areas E & F facilitates the option of a SUACS when an area is not occupied by Protector, thus minimising any impact to access for GA. Aircraft without communication equipment are unable to enter the activated DA, as they would not be able to receive a SUACS.	Potential small impact to GA on access if do not / cannot take advantage of a crossing service (e.g. SUACS) to achieve a direct routing. Estimated Class G airspace traffic levels in this area are likely to be generated by regional military operations, together with GA traffic, and will be dependent on various economic and social factors that are impossible to predict. The position and dimensions of Areas A, B & C could result in aircraft taking a longer route to avoid the DA. Activation of areas D, E & F will be infrequent and only for Protector ops, with no change to the current flow of aircraft below 2,300ft AGL. Above 2,300ft AGL the vertical split between areas E & F facilitates the option of a SUACS when an area is not occupied by Protector, thus minimising any impact to access for GA. Aircraft without communication equipment are unable to enter the activated DA, as they would not	Potential small impact to GA on access if do not / cannot take advantage of a crossing service (e.g. SUACS) to achieve a direct routing. The position and dimensions of Areas A & B could result in aircraft utilising the SUACS or crossing the Wash further NE over low population areas. Activation of areas C, D & E will be infrequent and only for Protector ops, with no change to the current flow of aircraft below 2,300ft AGL. Above 2,300ft AGL the vertical split between areas D & E facilitates the option of a SUACS when an area is not occupied by Protector, thus minimising any impact to access for GA. Aircraft without communication are unable to enter the activated DA as they would not be able to receive a SUACS.	Potential small impact to GA on access if do not / cannot take advantage of a crossing service (e.g. SUACS) to achieve a direct routing. Estimated Class G airspace traffic levels in this area are likely to be generated by regional military operations, together with GA traffic, and will be dependent on various economic and social factors that are impossible to predict. The position and dimensions of Areas A & B could result in aircraft utilising the SUACS or crossing the Wash further NE over low population areas. Activation of areas C, D & E will be infrequent and only for Protector ops, with no change to the current flow of aircraft below 2,300ft AGL. Above 2,300ft AGL the vertical split between areas D & E facilitates the option of a SUACS when an area is not occupied by Protector, thus minimising any impact to access for GA. Aircraft without communication equipment are unable to enter the activated	No change to GA access since the airspace and associated activity would remain unchanged.	No anticipated change to GA access since the airspace and associated activity would remain unchanged.

Table 16: Initial Options appraisal							
Group	Impact	Option 1: Year 1	Option 1: Year 10	Option 2: Year 1	Option 2: Year 10	Baseline: Year 1	Baseline: Year 10
			be able to receive a SUACS.		DA, as they would not be able to receive a SUACS.		
General Aviation / commercial airlines	Economic impact from increased effective capacity	N/A	N/A	N/A	N/A	N/A	N/A

General Aviation / commercial airlines	Fuel burn	Potential small impact to fuel burn if GA do not / cannot take advantage of a crossing service (e.g. SUACS) to achieve a direct routing. The position and dimensions of Areas A, B & C could result in aircraft taking a longer route to avoid the DA. Activation of areas D, E & F will be infrequent and only for Protector ops, with no change to the current flow of aircraft below 2,300ft AGL. Above 2,300ft AGL the vertical split between areas E & F facilitates the option of a SUACS when an area is not occupied by Protector, thus minimising any impact to fuel burn in GA. Aircraft without communication equipment are unable to enter the activated DA, as they would not be able to receive a SUACS.	Potential small impact to fuel burn if GA do not / cannot take advantage of a crossing service (e.g. SUACS) to achieve a direct routing. Estimated Class G airspace traffic levels in this area are likely to be generated by regional military operations, together with GA traffic, and will be dependent on various economic and social factors that are impossible to predict. The position and dimensions of Areas A, B & C could result in aircraft taking a longer route to avoid the DA. Activation of areas D, E & F will be infrequent and only for Protector ops, with no change to the current flow of aircraft below 2,300ft AGL. Above 2,300ft AGL the vertical split between areas E & F facilitates the option of a SUACS when an area is not occupied by Protector, thus minimising any impact to fuel burn in GA. Aircraft without communication equipment are unable to enter the activated DA, as they would not be able to receive a SUACS.	Potential small impact to fuel burn if GA do not / cannot take advantage of a crossing service (e.g. SUACS) to achieve a direct routing. The position and dimensions of Areas A & B could result in aircraft utilising the SUACS or crossing the Wash further NE over low population areas. Activation of areas C, D & E will be infrequent and only for Protector ops, with no change to the current flow of aircraft below 2,300ft AGL. Above 2,300ft AGL the vertical split between areas D & E facilitates the option of a SUACS when an area is not occupied by Protector, thus minimising any impact to fuel burn in GA. Aircraft without communication equipment are unable to enter the activated DA, as they would not be able to receive a SUACS.	Potential small impact to fuel burn if GA do not / cannot take advantage of a crossing service (e.g. SUACS) to achieve a direct routing. Estimated Class G airspace traffic levels in this area are likely to be generated by regional military operations, together with GA traffic, and will be dependent on various economic and social factors that are impossible to predict. The position and dimensions of Areas A & B could result in aircraft utilising the SUACS or crossing the Wash further NE over low population areas. Activation of areas C, D & E will be infrequent and only for Protector ops, with no change to the current flow of aircraft below 2,300ft AGL. Above 2,300ft AGL the vertical split between areas D & E facilitates the option of a SUACS when an area is not occupied by Protector, thus minimising any impact to fuel burn in GA. Aircraft without communication equipment are unable to enter the activated DA, as they would not be able to receive a SUACS.	No change in fuel burn since the airspace and associated activity would remain unchanged.	No anticipated significant change in fuel burn since the airspace and associated activity would remain unchanged.
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Table 16: Initial Options appraisal							
Group	Impact	Option 1: Year 1	Option 1: Year 10	Option 2: Year 1	Option 2: Year 10	Baseline: Year 1	Baseline: Year 10
Commercial airlines	Training costs	No perceived additional training costs.	No perceived additional training costs.	No perceived additional training costs.	No perceived additional training costs.	No perceived additional training costs.	No perceived additional training costs.
Commercial airlines	Other costs	No other costs anticipated.	No other costs anticipated.	No other costs anticipated.	No other costs anticipated.	No other costs anticipated.	No other costs anticipated.
Airport /ANSP	Infrastructure costs	No infrastructure costs will be imposed.	No infrastructure costs will be imposed.	No infrastructure costs will be imposed.	No infrastructure costs will be imposed.	No infrastructure costs will be imposed.	No infrastructure costs will be imposed.
Airport /ANSP	Operational costs	No operational costs anticipated.	No operational costs anticipated.	No operational costs anticipated.	No operational costs anticipated.	No operational costs anticipated.	No operational costs anticipated.
Airport /ANSP	Deployment costs	No costs anticipated for deployment.	No costs anticipated for deployment.	No costs anticipated for deployment.	No costs anticipated for deployment.	No costs anticipated for deployment.	No costs anticipated for deployment.
Airport /ANSP	Other costs	No other costs foreseen.	No other costs foreseen.	No other costs foreseen.	No other costs foreseen.	No other costs foreseen.	No other costs foreseen.
Safety Considerations (not an exhaustive list)		Pilots being unaware of new airspace Re-route through unfamiliar areas Funnelling as a result of need to re-route Increased controller workload due to SUACS requests	Pilots being unaware of new airspace Re-route through unfamiliar areas Funnelling as a result of need to re-route Increased controller workload due to SUACS requests	Pilots being unaware of new airspace Re-route through unfamiliar areas Funnelling as a result of need to re-route Increased controller workload due to SUACS requests	Pilots being unaware of new airspace Re-route through unfamiliar areas Funnelling as a result of need to re-route	Protection for civilian aircraft operating at Dafforn Wingland Wash	

Table 16: Initial Options appraisal							
Group	Impact	Option 1: Year 1	Option 1: Year 10	Option 2: Year 1	Option 2: Year 10	Baseline: Year 1	Baseline: Year 10
					Increased controller workload due to SUACS requests		

32 Evidence to be collected for Options Appraisal (Phase II) Full

32.1 The Change Sponsor will collect or build upon the following information to inform the next stage of the Options Appraisal:

- Development of quantitative analysis for affected parts of the surrounding class G airspace (including potential funnelling), and where available, supporting quantitative data;
- Conclusive utilisation intentions for the proposed designs.

33 Safety and Environment Assessment

33.1 The primary driver for this airspace change is to maintain and enhance safety for all airspace users operating in and around EGD207 Holbeach AWR. The current airspace arrangement does not fully contain all flight profiles associated with existing AWR activity or the introduction of Protector operations. As a result, aircraft routinely operate outside the notified DA in Class G airspace, where traffic is not fully known to ATS providers. This creates an unpredictable traffic environment and elevates the risk of mid-air conflict.

33.2 The proposed airspace design seeks to:

- Contain hazardous military activity within appropriately sized segregated airspace
- Reduce the likelihood of conflict between participating and non-participating aircraft
- Provide a more predictable and manageable airspace environment for both military and civil users

34 Safety Overview

34.1 The primary driver for this airspace change is to maintain and enhance safety for all airspace users operating in and around EGD207 Holbeach AWR. The current airspace arrangement does not fully contain all flight profiles associated with existing AWR activity, or the introduction of Protector operations. As a result, aircraft routinely operate outside the notified DA in Class G airspace, where traffic is not fully known to ATS providers. This creates an unpredictable traffic environment and elevates the risk of mid-air conflict.

34.2 The proposed airspace design seeks to:

- Contain hazardous military activity within appropriately sized segregated airspace
- Reduce the likelihood of conflict between participating and non-participating aircraft
- Provide a more predictable and manageable airspace environment for both military and civil users

35 Baseline Safety Issues

35.1 Some AWR activities, including high energy manoeuvres, formation approaches, and ingress/egress profiles, extend beyond the lateral and vertical limits of EGD207. This results in aircraft operating in Class G airspace without guaranteed traffic separation or full situational awareness. ATS providers are therefore unable to provide a fully known traffic environment to either military or civil aircraft.

35.2 Evidence of this risk is reflected in historical AIRPROX and DASOR reports associated with AWR activity, and the previous MOD-sponsored airspace change attempts (e.g. ACP-2017-046), which identified similar safety concerns.

35.3 These factors indicate that the current airspace structure does not adequately mitigate the risk of airborne conflict, particularly as activity levels increase over time.

36 Protector Operations

- 36.1** Protector introduces additional safety considerations due to its operational characteristics. As Protector currently operates with limited DAA capability, it cannot safely operate in non-segregated Class G airspace.
- 36.2** Protector requires specific flight profiles aligned to ground-based targets by use of onboard MTS and associated optical systems. These flight profiles extend beyond the current EGD207 boundary and thus Protector operations cannot be safely contained within the existing DA.
- 36.3** The MTS includes systems that introduce optical and laser hazards, which represent a significant safety consideration. The use of such systems requires that exposure to non-participating aircraft must be prevented, thus MTS operations confined within a known, controlled environment to ensure no unintended illumination or exposure of other aircraft and provide assurance that all aircraft within the volume are participating and under control.

37 Safety Benefits of the Proposed Change

37.1 The proposed design options deliver safety improvements through:

- Containment of hazardous activity (including high energy manoeuvres, formation flying and new weapon system operation). These will be contained within defined airspace boundaries, reducing the likelihood of aircraft “spilling” into uncontrolled airspace and/or interaction with non-participating traffic whilst providing segregation of incompatible operations.
- Non-participating aircraft will be excluded from active areas, or operate under a Special Use Airspace Crossing Service (SUACS). Clear segregation between hazardous military activity and civil traffic reduces reliance on “see and avoid” in a mixed environment.
- Improved situational awareness, as all aircraft within the DA will be in communication with ATS providers, thus traffic will be known and managed.

38 Safety Buffer Compliance

The Change Sponsor has considered all the design options’ status with regard to the safety buffer criteria laid down in the ‘Policy for the establishment and operation of Special Use Airspace¹⁶’ and proposes that they comply with the policy. The proposed airspace vertically overlaps Class C airspace, and the northeast extension is no closer than 5.1nm from the North Sea CTA1. The Change Sponsor has engaged with NATS as part of the State 2 Engagement Process and feedback has been received as outlined in Table 5. Should amendment be necessary to existing LOAs between the AWR and NATS, these will be presented to the CAA for approval with the Final Submission at Stage 4 of the ACP.

Environmental Assessment

39 CAP 2091²² Minimum Standards for Noise Modelling

39.1 Since the surrounding airspace of Holbeach AWR is Class G uncontrolled airspace, where the majority of the civil air traffic is GA and engaged predominantly in leisure or sporting activity, it would be challenging to predict traffic patterns created or altered by new airspace and hence the production of operational diagrams would be difficult and of no benefit. The Change Sponsor has also assessed that the proposed change, which is being undertaken to accommodate Protector and current AWR users, it will not result in an increase in the number of aircraft operating in the local area, nor will the aircraft types be altered. Therefore, the same

²² [REF I: CAP 20191 Noise Modelling](#)

amount and type of noise is likely to impact the local population as is currently the case. Since the change is likely to impact few civil airspace users, and considering the mitigations put in place (e.g. NOTAM, SUACS), the overall impact of the proposed change on noise is thought to be negligible.

- 39.2 Based on the classification, location and utilisation of surrounding airspace, the requirement for noise modelling as per CAP2091 is disproportionate to the numbers of aircraft which might be affected and, therefore, the Change Sponsor requests that formal noise modelling be scoped out of the airspace change requirement. Therefore, the Change Sponsor has not confirmed a noise modelling category for this ACP.

40 Tranquillity and Biodiversity

- 40.1 CAP1616 also requires Change Sponsors to consider effects of new airspace on tranquillity and biodiversity. In accordance with paragraph 2.19 of CAP1616i²³, ACPs sponsored by 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.
- 40.2 In a similar vein to the noise-modelling requirement, the Change Sponsor proposes that the effects on tranquillity and biodiversity as negligible for this ACP. Aircraft will continue to request and obtain a SUACS to cross the airspace in their current manner, with only a small percentage of them requiring a reroute due to activity within the segregated airspace. Re-routing may result in aircraft 1nm further south over land compared to current day scenario, or aircraft will remain over The Wash as they do today to operate north of the EGD207. The Change Sponsor proposes that a quantitative assessment would be disproportionate to the numbers of aircraft affected and should be scoped out. The Change Sponsor will continue to work with Holbeach AWR where possible in a co-operative manner to minimise reroutes and promote the use of SUACS.

41 Habitat Regulations Assessment

- 41.1 The Change Sponsor must undertake a screening exercise to assess whether the airspace change proposal is likely to have a significant effect (either alone, or in combination with, other plans or projects) on European sites. The completed habitats regulations assessment early screening criteria form, as given in CAP 1616i, Environmental Assessment and CAP 1616g, is below:
- Q1. *Are there any changes to air traffic patterns or number of movements expected below 3,000 feet due to the airspace change proposal? If the answer to Q1 is 'no' then habitats regulations assessment is no longer required. If the answer to Q1 is 'yes' then proceed to Q2 below.*
- A1: The airspace proposed is designed to segregate current activity, together with very infrequent activity of a singular aircraft. Otherwise, the traffic patterns and number of movements below 3,000ft are considered to be business as usual. Therefore, the Change Sponsor proposes that the Habitats Regulations Assessment is not required as the answer to Q1 is 'no'.

²³ REF G: CAP 1616i

Q2a. Are there any European sites within a radius of 18 km of each runway end?

Q2b. Are any European sites identified in Q2A overflown (i.e. plane passing directly overhead or within 2,655 feet of the boundary of a European site at 3,000ft or below) by proposed flight routes?

If the answer to Q2a and Q2b are both 'no' then habitats regulations assessment is no longer required. If the answer to Q2a or Q2b is 'yes' then proceed to Q3 below.

A2: Not required.

Q3a. Will the airspace change proposal reduce the number of movements overflying one or more European sites, while not increasing them over another?

Q3b. Will the airspace change proposal increase the altitude of aircraft overflying one or more European sites, whilst not decreasing altitude over another?

If the answer to Q3A and Q3B are both 'yes' then habitats regulations assessment is no longer required. If the answer to Q3A or Q3B is 'no' then secondary screening will be required.

A3: Not required.

Conclusion

42 Summary

- 42.1 During Stage 2 of this ACP, the Change Sponsor presented the Baseline Scenario and the 3 Design Options by means of the engagement process as mandated in CAP1616f. The Change Sponsor received feedback from 2 stakeholders who presented minor changes to the Baseline (MOD) as well as proposed changes to the Design Options (MOD & Ufly4fun). One stakeholder rejected Design Option 3.
- 42.2 Design Option 3 will be discounted for Stage 3 due to the lack of FUA principles and the impact to key stakeholders. Options 1 and 2 are the preferred options, but further consultation and analysis is required to determine the final design proposal.

Next Steps

43 Submission

- 43.1 This document will be submitted to the CAA as evidence to support the ACP-2024-028 Stage 2. It is part of the documentary evidence for the Stage 2 Assessment Gateway scheduled for 31 July 2026.

44 Timeline

- 44.1 A copy of the new agreed timeline is available on the CAA's Airspace Change Portal²⁴ and depicted at Table 17.

Table 17: ACP-2024-028 Timeline	
CAP1616 Gateway	Planned Date
Stage 2 – Develop & Assess	31 July 2026
Stage 3 – Consult Gateway	28 August 2026
Stage 4 – Update & Submit	29 January 2027
Stage 5 – Decide	28 May 2027
Stage 6 – Implement	AIRAC 09/2027

²⁴ [Airspace Change Proposal Change Sponsor Indicative Timeline Update Request Form](#)