



INITIAL STAKEHOLDER CONSULTATION FEEDBACK

Ministry of Defence Airspace Change Proposal for Unmanned Aircraft

Consultation material relating to proposed airspace changes above South Wiltshire, Kennet and the Test Valley to meet Ministry of Defence training requirements for unmanned aircraft.

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Record of changes

Issue	Date	Detail of Changes
1	09 March 2009	Initial Issue
2	12 May 2009	Correction to ordering of items in Table 1 of Appendix A (otherwise text unchanged)

Note

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Front Cover: Artist's impression of Watchkeeper (courtesy of THALES).

1 Aim

- 1.1 This aim of this document is to provide stakeholders and other interested parties with feedback on the consultation conducted by the MoD regarding the proposed introduction of segregated airspace to the south of the current Salisbury Plain Training Areas (SPTA) to accommodate routine training with unmanned aircraft. It also sets out a number of changes in requirement which have been identified since the consultation process began and the 'next steps' to be taken with regard to the application for change.

2 Public Consultation Process

- 2.1 The consultation period for the MoD sponsored airspace change proposal for unmanned aircraft ran over a 16 week period from 16 June 2008 to 29 September 2008. A copy of the original consultation document¹ is available at www.qinetiq.com/airspace.
- 2.2 Sixty eight organisations were identified as primary stakeholders and each was formally notified by letter at the start of the consultation process. In addition 117 Parish Councils were notified of the consultation. Stakeholders and Parish Councils were sent reminders 4 weeks prior to the end of consultation. A copy of the consultation material was also made available at all Wiltshire libraries and selected Hampshire libraries.
- 2.3 Advanced notification of consultation was published in local newspapers. Also, a MoD press release was issued on 17 June 2008, which resulted in additional radio, television and newspaper coverage.

¹ "STAKEHOLDER CONSULTATION Ministry of Defence Airspace Change Proposal for Unmanned Aircraft", Issued by QinetiQ as QinetiQ/EMEA/IX/TR0800326 Issue 1 dated 16 Jun 08

3 Changes in Requirement

- 3.1 Since the start of the public consultation process there have been some significant developments in the Watchkeeper programme that have had a direct impact on the associated airspace requirements for the platform. These include:
- A long term deferral of plans to build a tarmac runway at Upavon
 - A requirement to exercise the coordination of UAV operations and manned aviation, based on operational experience of other UAV platforms
 - The implementation date for the proposed airspace has been delayed until June 2010
- 3.2 Whilst operations from Upavon airfield are still possible from the grass runway, utilisation of this surface alone will not meet the full training requirement and the preference would be to also operate from a hard runway. Because of this the MoD is planning to initially operate Watchkeeper from both Boscombe Down and Upavon. Whilst operation at Boscombe Down will be invaluable in the short to medium term, Upavon remains the preferred solution for the longer term.
- 3.3 As the current change proposal does not include any options for segregated airspace within the vicinity of Boscombe Down the MoD has decided to amend the current proposal to incorporate such options. The delay to the proposed implementation date means that there is sufficient time for this work to be undertaken. Key stakeholders will be consulted during the initial design phase and a second period of consultation will be undertaken in due course.

4 Responses to Consultation

4.1 Response statistics

4.1.1 The MoD would like to thank all those who responded to this consultation. These responses have been analysed by air traffic management specialists familiar with the local airspace. The main issues raised are addressed in this feedback document and, where appropriate, will be considered in any revised design.

4.1.2 Consultation documents were sent to 68 primary stakeholders and 117 Parish Councils in the vicinity of the proposed airspace were advised of the consultation.

4.1.3 Of the 68 identified primary stakeholders, 51 (74%) did not respond, 7 (10%) were in favour of the proposal, 4 (6%) were against the proposal and 7 (10%) responded without comment.

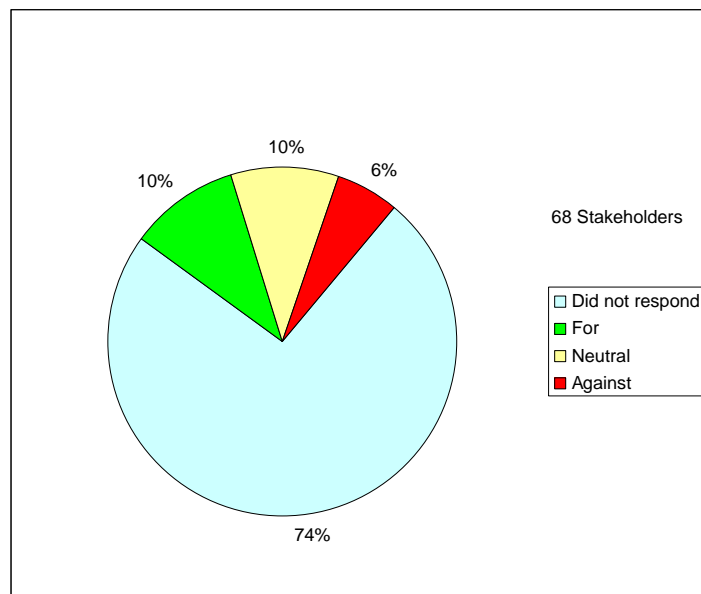


Figure 1; Responses from identified Stakeholders

4.1.4 Of the 117 notified Parish Councils, 103 (88%) did not respond, 2 (2%) were in favour of the proposal, 1 (1%) was against the proposal and 11 (9%) responded without comment.

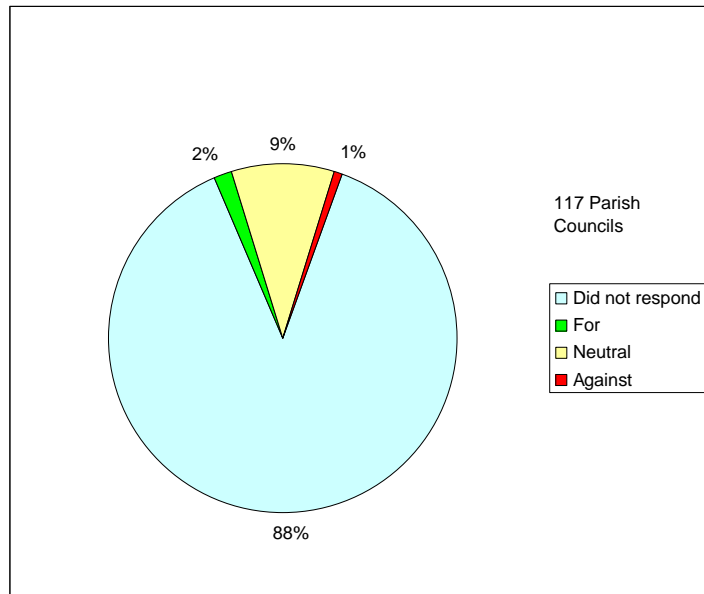


Figure 2: Responses from Parish Councils

4.1.5 In addition to the responses received from stakeholders and Parish Councils, 55 responses were received from members of the public, the majority representing the General Aviation community. Of these responses, 9 (16%) were in favour of the proposal, 22 (40%) were against the proposal and 24 (44%) made no comment regarding the current proposal but raised concerns either regarding the possibility of Watchkeeper being based at Boscombe Down or the overall consultation process.

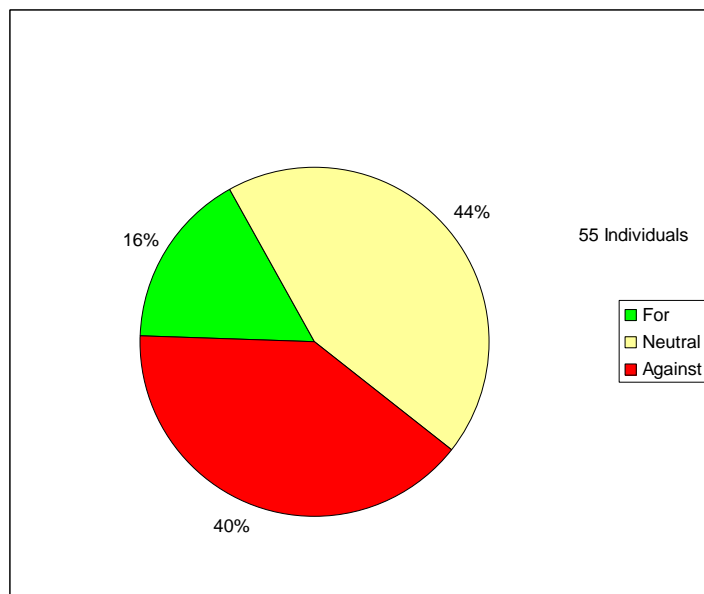


Figure 3; Responses from individuals

4.2 Issues raised

4.2.1 Analysis of consultation responses identified a number of key themes from the issues raised. These are presented and analysed in Appendix A.

4.3 Common questions

4.3.1 Appendix B provides answers to the most common questions raised during consultation.

5 Next Steps

- 5.1 In order to access the Salisbury Plain Danger Areas and the new airspace block, UAVs launching and recovering from Boscombe Down will require segregated airspace. The Civilian Aviation Authority (CAA), Directorate of Airspace Policy has confirmed that the current Air Traffic Zone (ATZ) has not been established for the purpose of segregation and has recommended the use of a Danger Area in these circumstances. The current Airspace Change Proposal will now be amended to include a Danger Area the same dimensions as the ATZ (radius 2.5 nm, height 2000 ft) which will be activated for UAV operations only.
- 5.2 Initial consultation will be undertaken with key aviation and environmental stakeholder groups over the coming months to ensure that the revised design is compatible with other airspace activities conducted in the Boscombe Down area, and operation is not environmentally obtrusive.
- 5.3 Once the revised proposal has been refined, further public consultation will be undertaken in accordance with CAP 725, Civil Aviation Authority Guidance on the Application of the Airspace Change Process.

6 List of abbreviations

ATC	Air Traffic Control
ATZ	Air Traffic Zone
CAA	Civil Aviation Authority
CO ₂	Carbon Dioxide
DACS	Danger Area Crossing Service
DAP	Directorate of Airspace Policy
FL	Flight Level
MoD	Ministry of Defence
NOTAM	Notice to Airmen
RA	Royal Artillery
SPTA	Salisbury Plain Training Area
UAV	Unmanned Aerial Vehicle

A Key Issues Raised

A.1 Analysis of consultation responses identified a number of key themes. These themes are identified in Table 1 and the number of times each theme was raised² is shown in Figure 4.

A.2 The list of themes is not exhaustive; however, all consultation responses will be reviewed during the redesign process and be incorporated into the consultation record which will form part of the formal Airspace Change Proposal document to be submitted to the Civil Aviation Authority.

³Table 1; Key Themes

	Theme	Description
1	Location of proposed airspace	The response refers to options for alternative locations for the proposed airspace or use of existing danger areas
2	Activation of D126/D128	The response refers to the activation rate of D126/D128 to 9000 ft
3	Operations from Boscombe Down	The response refers to the need to consider airspace requirements if unmanned aircraft are to operate from Boscombe Down
4	Process	The response refers to the consultation process
5	Future lowering of proposed base level	The response refers to the possibility of the base level of the proposed airspace being lowered in the future
6	Platform safety	The response refers to the safety of unmanned aircraft
7	Operational impact	The response refers to the impact of the proposed change on other airspace users
8	Privacy/data protection	The response refers to concerns over privacy and data protection
9	Availability of Danger Area Crossing Service (DACS)	The response refers to the availability of the proposed DACS
10	Noise data	The response refers to the availability of actual noise data
11	Mitigation for change	The response refers to suggested mitigation for the change
12	Air traffic management	The response refers to air traffic control (ATC) and airspace management issues

² The statistics in Figure 4 reflect the fact that a single response often made reference to a number of different themes.

³ At Issue 2: Correction to ordering of items in Table 1 of Appendix A (otherwise text unchanged)

³Table 1; Key Themes

	Theme	Description
13	Overcrowding/restriction of Class G airspace	The response refers to the general reduction in Class G airspace
14	CO ₂ emissions	The response refers to the potential increase in CO ₂ emissions from the re-routing of other airspace users
15	Liaison/coordination with other airspace users	The response refers to the need for further co-ordination with other airspace users
16	Overflight of populated areas	The response refers to the need for unmanned aircraft to over fly populated areas
17	Squawk allocation	The response refers to the proposed squawk allocation for unmanned aircraft
18	Use of proposed airspace for other military activity	The response reference the potential for the airspace to be activated for other military activity
19	Noise impact	The response refers to noise over quiet areas and tranquillity
20	Visual impact	The response refers to visual intrusion

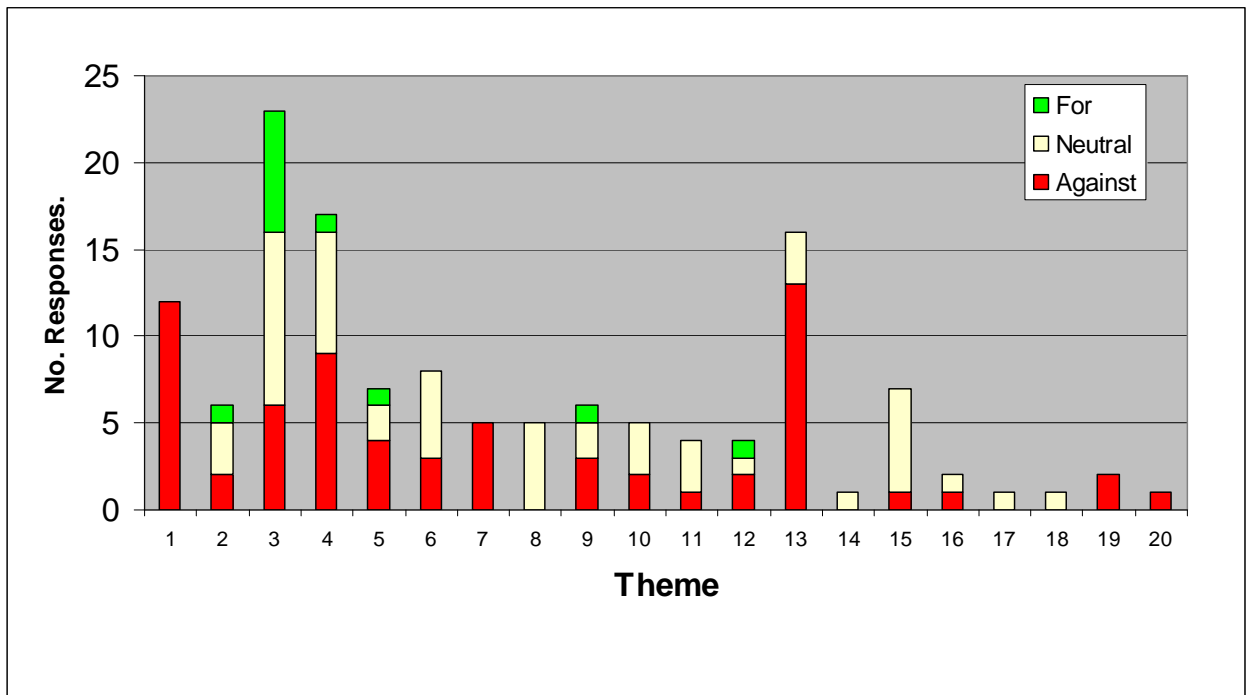


Figure 4; Responses by Theme

B Comments on Key Issues

This section provides responses to the most common issues raised during consultation.

B.1 Why is the airspace being proposed in the busy South West area when the MoD already has a large number of danger areas in much less busy airspace?

Watchkeeper, the primary user of the airspace, will be operated by 32 Regiment RA based at Larkhill, hence the logistic hub and ground based training solution will be co-located there. This in itself does not restrict flying to SPTA but the requirement to interact with the armoured formations that train there does. A secondary consideration is the logistic, personnel and administrative difficulties associated with moving a significant number of personnel and quantities of materiel from Larkhill to an alternative Danger Area containing a runway, at the frequency required. There is no other Danger Area where Watchkeeper could interact with armoured formation training, within reasonable distance of the 32 Regiment logistic hub and ground based training facility, in close proximity to a runway or land upon which a runway could be built. It is the concurrency of these requirements that drives the requirement to locate the proposed new airspace in the South/South West.

It will be possible to use other UK and overseas Danger Areas for the testing of the Watchkeeper and other unmanned aircraft as this activity is not so heavily reliant on the supporting infrastructure described above.

B.2 How often will danger areas D126 and D128 be activated above 1,400 ft?

The proposed new airspace to the south of SPTA will be activated only when required to meet the training need in order to minimise the disruption to other airspace users. To enable that minimum to be achieved there will be sorties that can, and will, be contained within the existing SPTA; in doing so D126 and D128 may have to be activated above 1,400 ft for the duration of the flight. Conversely, for longer operations in the proposed new airspace D126 and D128 may only need to be activated above 1,400 ft during take-off and landing. In all cases the airspace will only be NOTAMed for the minimum period required.

B.3 What airspace provision will there be to facilitate Watchkeeper operations from Boscombe Down?

Changes to the design to include additional segregated airspace in the vicinity of Boscombe Down are currently being developed, and consultation on this issue will occur in due course.

B.4 If the proposed new airspace is approved will the lateral or vertical boundaries be increased in the future?

Should the proposed airspace be approved any amendment to the approved boundaries would require another Airspace Change Proposal to be submitted.

B.5 Will the proposed DACS allow civil aircraft access to the proposed new airspace and will it be available at all times when the proposed airspace is active?

Subject to approval from the Directorate Airspace Policy, the DACS will potentially be available to all airspace users. Boscombe Down ATC will be manned during all unmanned aircraft operations and a DACS will be available at all times when the proposed airspace is active.

B.6 How will you ensure the unmanned aircraft remain separated from other airspace users?

The primary purpose for establishing segregated airspace with this proposal is to provide a safe environment in which unmanned aircraft can operate. In addition to the segregated airspace any unmanned aircraft operation within the proposed airspace will be in receipt of a radar service from Boscombe Down ATC and all instructions given to the unmanned aircraft will be mandatory to ensure separation is maintained from other aircraft.

B.7 Why are unmanned aircraft flights being proposed over populated areas?

The proposed airspace is being requested to accommodate the training requirements for unmanned aircraft systems operated by the military. All unmanned aircraft operating in the airspace will have undergone a rigorous testing programme and will meet the airworthiness safety standards equivalent to those applied to UK military manned aircraft.

B.8 If the proposed airspace is approved would it be activated for other military activity?

The proposed airspace will only be activated to accommodate unmanned aircraft flights, however, other military or civil aircraft may, subject to ATC clearance, operate within the airspace at the same time.

B.9 Will the MoD look at revising the boundaries of the current SPTA danger areas as mitigation for this proposed change?

A significant number of military units operate within the SPTA both on land and in the air. It is not within the scope of this Airspace Change Proposal to conduct a review of the requirements for all SPTA users therefore no changes to the current boundaries are being considered.

B.10 Will unmanned aircraft be allocated a dedicated Squawk for use in UK airspace?

The Directorate of Airspace Policy has advised that there are no plans to allocate a dedicated squawk for unmanned aircraft. Consequently unmanned aircraft operating in the proposed airspace will be allocated a Boscombe Down squawk. Initially, Boscombe Down ATC will advise local radar units of squawks allocated to unmanned aircraft.

B.11 The radar analysis in Appendix E (of the consultation document) only shows tracks for transponding aircraft. Were non-transponding aircraft and gliders considered when assessing operational impact?

Although the radar analysis only shows transponding aircraft, consideration was given to non-transponding aircraft when assessing operational impact. Unless an exemption is in place the carriage of a transponder is mandatory for aircraft operating above FL 100 and local knowledge indicates that, with the exception of gliders, the majority of non-transponding aircraft operating in the vicinity of the proposed airspace generally do so at 4000 ft or below, so would not be affected by the proposed change. There are a number of gliding sites in the vicinity of the proposed new airspace and some of these were consulted during the initial design phase. With the exception of mountain wave flying and some cross country competitions it was felt that gliding activity would not be adversely affected. The proposed DACS and the provision of Letters of Agreement would further reduce the operational impact on gliding activity.

B.12 How can we be assured that the unmanned aircraft operating in the proposed airspace are safe?

As with all aircraft in military service, any UAV utilising the proposed airspace will have a comprehensive safety approval that meets the same standard as its manned equivalent. This safety approval covers all aspects of design, maintenance, envelope, operation and training.

B.13 When will actual noise data be available for Watchkeeper?

Watchkeeper is currently undergoing initial flight trials overseas. Every effort is being made to obtain actual noise data for the platform and this data will be made available in the second round of public consultation.

B.14 What steps are being taken to ensure privacy?

As stated in the consultation document, any imagery gathered from Watchkeeper sensors will be destroyed once it has served its training purpose. Should there be a need to retain any of this imagery then it will be subject to the provisions of the Data Protection Act 1998.

B.15 Why were key aviation stakeholders not consulted during the initial design phase and why have no aviation workshops been held?

A number of key aviation stakeholder groups were consulted during the initial design phase. These included: the British Gliding Association and representatives from local gliding clubs, local airfields and flying clubs, local Air Traffic service providers and other military airspace users. The valuable feedback and detailed knowledge of local airspace received from these groups was used to revise the design and, at the time, it was not felt that aviation workshops were required.

The change in requirement that has led to the need for additional segregated airspace in the vicinity of Boscombe Down, means that the proposal may have a greater impact on the GA community. As a result of this the MoD is planning to engage with local airspace users during the forthcoming initial consultation phase, prior to the second round of formal public consultation.

Distribution List

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National Organisations

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National Farmers Union
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