

# **IMPACT ASSESSMENT**

Changes to airspace sub-divisions within the D201 complex, re-alignment of the D201/D202 Boundary in the Vicinity of West Wales Airport, and associated nomenclature changes.

May 2018

## **Context**

This Impact Assessment has been produced in accordance with CAA publication CAP725 titled "CAA Guidance on the application of the Airspace Change Process", fourth edition, March 2016.

## **Document Attributes**

Document Title	Impact Assessment – Changes to airspace sub-divisions within the EG D201 complex, re-alignment of the D201/D202 Boundary in the Vicinity of West Wales Airport, and associated nomenclature changes.		
Document Number	ACP1916\IA\01		
Author	(Danger Area Airspace Manager)		
Version	1.3		
Date	03 May 2018		

## **Change History**

Version	Date	Summary of Changes	
0.A	02-03-2018	Initial draft for internal review	
0.B	07-03-2018	Revised draft.	
1.0	07-03-2018	First issue.	
1.1	17-04-2018	Second Issue post changes of heights and slight amendments for CAA submission	
1.2	20-04-2018	Third issue post slight amendments following further liaison.	
1.3	03-05-2018	Fourth issue post slight amendments following further liaison.	

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## **Executive Summary**

This Impact Assessment has been prepared by the MOD Danger Area Airspace Manager (DAAM) in support of proposed changes to the airspace sub-divisions and nomenclature changes to parts of the D201 and D202 segregated airspace complexes in order to improve Flexible Use of Airspace (FUA) and enhance safety.

In summary, this Impact Assessment considers the following proposed changes in accordance with CAP725 guiding principles:

- Adoption of standardised Danger Area (DA) naming convention (whereby all discrete airspace blocks within a DA complex are assigned a unique suffix);
- Sub-division of what is currently D201 into two discrete airspace blocks (to be known as D201H and D201J);
- Re-alignment of boundary between D201 and D202 complexes in the vicinity of West Wales Airport (WWA);
- Creation of D202D (which replaces D202 in light of D201/D202 complex boundary changes and standardised DA naming convention);
- Deletion of D201, D201E and D202 airspace blocks (as currently promulgated).

The impact of these changes has been assessed as entirely positive, with the following main benefits identified:

- Economic and environmental benefits to IFR GAT traffic that will be able to make greater use of the L18 route (i.e. due to the creation of D201H);
- Safety benefits to General Aviation (GA) through the simplification of segregated airspace in the vicinity of WWA, and the adoption of the standardised DA naming convention;
- Operational benefits to MOD and other users of the D201/D202 DA complexes, as a result of increased flexibility (i.e. more opportunity for adjacent operations);
- Improved access and egress arrangements for GA aircraft using WWA;
- No increase in the overall volume of segregated airspace.

This Impact Assessment has been prepared so that CAA may fully consider the proposal in detail, as part of the Regulatory Decision phase.

**Note to readers:** In describing the current airspace there is often the potential for confusion between airspace complexes such as D201 or D202, and discrete blocks of airspace with the same name. To overcome this problem, said discrete blocks of airspace will be referred to as EG D201 or EG D202 wherever there is potential for confusion.

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### 1. Introduction

- 1.1 The Aberporth Danger Area complex (D201) comprises 2,379 NM² of airspace above Cardigan Bay intended for military test firing and other hazardous activities that cannot be conducted safely above populated areas. Commensurate with some of the activities undertaken, D201 airspace can be notified as active from the surface to an unlimited height.
- 1.2 Whilst the full lateral and vertical extent of the D201 complex is still required for certain trials such as weapons firing, some trials and activities undertaken can be performed within a much smaller volume airspace. Recognising this and embracing Flexible Use of Airspace (FUA) principles, the original D201 airspace has been subdivided a number of times over the years to create a series of integral blocks of airspace. Hence, individual sub-divisions of airspace can be notified as active, each to an upper height limit commensurate with the activity being undertaken.
- 1.3 The D201 complex currently comprises EG D201, D201A, D201B, D201C, D201D, D201E, D201F and D201G airspace sub-divisions as depicted in Figure 1. From this graphic it can be seen that EG D201 is by far the largest airspace block within the complex, amounting to 1,654 NM<sup>2</sup> in area (69% of the entire complex).
- 1.4 Whilst almost entirely offshore, the D201 complex includes a "bubble" of airspace (D201E as shown in Figure 1) that extends 3 NM inland, encompassing Aberporth Range Head and West Wales Airport (WWA). The latter being a former government aerodrome that prior to 2001 was used solely to support Aberporth Range activities and as such was suitable for use by military aircraft engaged in Range trials.
- 1.5 WWA (EGFA) is now operated independently of MOD Aberporth and has a requirement to be operational and fully accessible to all aircraft during published hours regardless of whether the D201 complex is active or not. The presence of D201E, as it currently stands serves no current purpose as operations have effectively superseded the reasons why it was originally designed. When being utilised by WWA the operating pattern for the current UAS (Watchkeeper) requires use of the current EGD202 in addition to EGD201E for climb and descent. Additionally, the current use of EGD201E requires a complete LOA of its own. Removal will clearly clean up this process and enable removal of one LOA.
- 1.6 The West Wales Danger Area complex (comprising EG D202, D202A, D202B and D202C) was established in 2011 solely for the purpose of testing Unmanned Aircraft Systems (UAS). It was deliberately designed to abut the D201 complex in order to provide contiguous segregated airspace for civil or military UAS platforms operating out of WWA into the D201 and/or D202 complexes.
- 1.7 Currently, UAS operations out of WWA routinely require activation of EG D201, D201E and EG D202 airspace blocks. These aircraft typically fly at slow speeds (<80 kt) and operate below FL180. Consequently, flights are nearly always confined to segregated airspace within a 35 NM radius of WWA.

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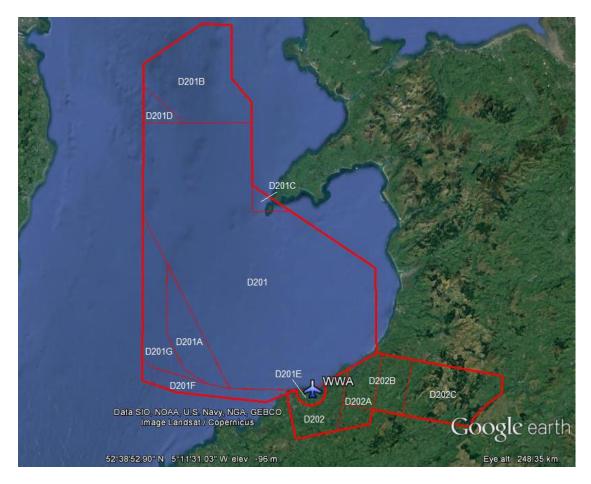


Figure 1: Current Lateral Extent of D201 and D202 complexes

- 1.8 By sub-dividing the main EG D201 airspace block, the majority of UAS operations from WWA and certain Aberporth Range activities could be conducted within a southern area, thus avoiding the need to activate the northern half of EG D201 when it is not required.
- 1.9 In proposing the sub-division of EG D201, it has also been recognised that further FUA improvements can be achieved by re-aligning the D201/D202 boundary in the vicinity of WWA. This will simplify airspace management procedures.
- 1.10 The third and final initiative of this proposal is to take the opportunity to adopt the standardised DA naming convention whereby all discrete airspace blocks within a DA complex are assigned a unique alphabetical suffix. Hence, it will no longer be possible to confuse the D201 or D202 (airspace blocks) with D201 or D202 (entire DA complexes).

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## 2. Justification for the Change

- 2.1 As already stated, the proposed change is derived from three separate issues, namely:
  - i.) The need to adopt the standardised DA naming convention within the D201 and D202 complexes;
  - ii.) The need to sub-divide the EG D201 airspace block, and
  - iii.) The need to re-align the D201/D202 boundary in the vicinity of WWA.
- 2.2 The justification for each aspect of the proposed change is presented separately. The order in which they are presented has been chosen to simplify articulation, and does not infer any order of importance.

### **Adoption of Standardised DA Naming Convention**

- 2.3 Historically, new DAs (which are not part of an established DA complex) have been assigned an identifier without a letter suffix. It is only when they have been subdivided, or additional DAs attached that a suffix is used to discriminate between the different airspace blocks within the DA complex.
- 2.4 In the interest of flight safety, the MOD is currently completing an ACP to standardize the naming convention across the whole of its Airspace. To ensure timely standardization this change encompasses those changes.

#### **Sub-division of EG D201**

- 2.5 The primary justification for the sub-division of EG D201 is Flexible Use of Airspace (FUA). In making this change the MOD is assisting in allowing for greater use of the Airspace in line with current Airspace DA policy.
- 2.6 The primary role of WWA business is to provide resources necessary for the testing and development of Unmanned Aircraft (UA). Those UA operated beyond visual line-of-sight (BVLOS) require the provision of segregated airspace.
- 2.7 WWA is totally committed to FUA and in this respect has for a number of years been increasingly concerned about the large lateral extent of EG D201 activated for the flying of UA, as it was evident that the northern half of this airspace block is not routinely used.
- 2.8 The activation of EG D201 has an impact on the operation of ATS Route L18, necessitating use of M17. This has an environmental impact due to the extended routings necessary for GAT when L18 is not available. This impact is disproportionate and difficult to justify if the whole of EG D201 is not fully utilised.

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- 2.9 While it is not advocated that the full lateral extent of EG D201 will never be required for UA flying, most of the current and future UA flying expected at WWA that require to operate offshore will have no need to use that part of EG D201 north of latitude 523000N.
- 2.10 Furthermore, the majority of current UA operations conducted within the part of EG D201 south of 523000N will only require segregated airspace to be activated up to FL180, or lower as required, and hence ATS Route L18 will be unaffected, when activated purely for UA Operations. It should be noted that future systems may require full UNL access.
- 2.11 In accordance with the standardised DA naming convention, and as proposed by MOD, the two new blocks of airspace created will be assigned the suffixes H and J (see airspace chart at Annex A).

## Re-alignment of D201/D202 boundary in vicinity of WWA

- 2.12 As stated earlier, the original D201 complex included a "bubble" of airspace (see Figure 2) that extends 3 NM inland, encompassing Aberporth Range Head and WWA. The original justification for the "bubble" is thought to be due to the fact that WWA was formerly a government aerodrome, entirely dedicated to supporting MOD activities inside the Aberporth Range.
- 2.13 WWA (EGFA) is now a CAA licensed aerodrome. It is operated independently of MOD Aberporth and has a requirement to be operational and fully accessible to all aircraft during published hours regardless of whether the D201 complex is active or not.

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Figure 2: Location of WWA inside the "bubble" of D201

- 2.14 The West Wales Danger Area complex (comprising EG D202, D202A, D202B and D202C) was established in 2011 solely for the purpose of testing Unmanned Aircraft Systems (UAS). It was deliberately designed to abut the D201 Complex in order to provide contiguous segregated airspace for civil or military UAS platforms operating out of WWA into the D201 or D202 complexes.
- 2.15 The need to be within segregated airspace is essential for WWA as it has become established as a specialist airport for the testing, development and operation of UAS. It is particularly suited to those with a requirement to operate BVLOS as they must remain inside segregated airspace at all times. Furthermore, the contiguous nature of D201 and D202 airspace means that UAS platforms operated from WWA have access to both offshore and inland Danger Areas.
- 2.16 D201E was established in 2011 specifically to enable UAS operations out of WWA to gain access to the D202 complex without having to activate the whole of EG D201 (see Figure 3). The airspace is now activated for all UA operating BVLOS from WWA, irrespective of whether missions are being carried out in D201 or D202 airspace.

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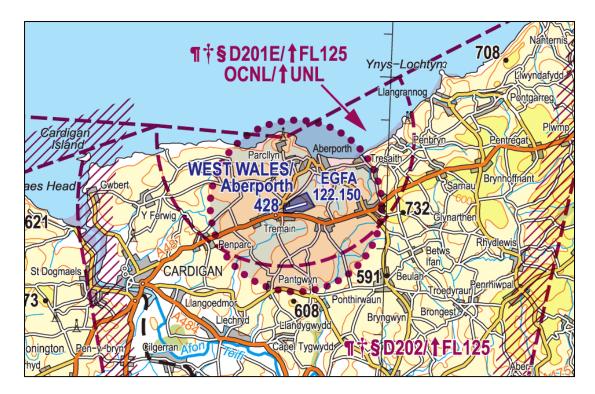


Figure 3: Location of WWA in relation to D201E and D202

- 2.17 From its inception, MOD Aberporth activated D201E whenever EG D201 was activated, to ensure profiles operated from the Range head were safe as well as safety of other Airspace users against Range equipment. This was changed to ensure that EDG201E was only activated independently, as required, some 2 years ago. In principle, this could mean access was restricted to WWA for any other traffic and no egress available for any UAS operations into D202. This condition is currently overcome by the Letter of Agreement (LoA) between MOD and WWA that delegates to WWA the airspace in D201E up to 1 NM north of the runway, parallel to it and up to 5,000 feet (see Figure 4). With these changes the need for this LOA will be negated with any required paragraphs added into the Operational use LOA.
- 2.18 As a result of the LoA, the ability to use the shaded part of D201E for hazardous activities such as live firing is no longer possible. It is therefore questionable whether there would ever be a requirement for airspace above 5,000 ft in the delegated area for hazardous activities in the future.

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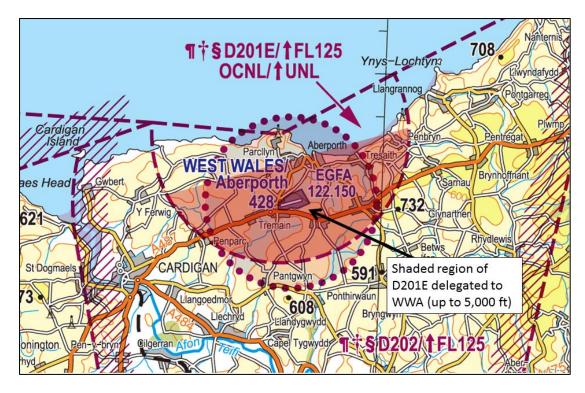


Figure 4: Part of D201E delegated to WWA

- 2.19 To meet the continued growth in demand for UAS operations in both D201 and D202, primary and secondary radar and communications equipment has been installed at WWA. Fully operational since 2016 the new facility, callsigned West Wales Radar (WWR), provides independent ATS inside the D201 and/or D202 complexes. ATS provided by WWR are delivered at times when MOD Aberporth Range Air Control (RAC) is unavailable or when adjacent operations are required by different parties. The introduction of WWR has enabled greater flexibility with regard to the way UAS operations are now managed, including:
  - Adjacent operations that allow WWR to conduct UAS operations inside the part of D201E delegated to WWA and the D202 complex whilst MOD Aberporth RAC is operational and managing the rest of the D201 complex.
  - Autonomous operations that allow WWR to manage military or civilian UAS operations inside D201 and/or D202 at times when there is no MOD program requirements for the airspace, there is no service available from MOD Aberporth RAC, or when operations are required outside of MOD Aberporth RAC operating hours.
- 2.20 The creation of D201H and D201J (through the sub-division of EG D201) provides an opportunity to address the problems associated with maintaining D201E. A simple realignment of the D201/D202 boundary would see the part of D201E currently delegated to WWA (10 NM² in area) transferred to EG D202D, and the remaining 6 NM² of D201E absorbed into D201H.

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2.21 This can be achieved by replacing the semi-circular protrusion (i.e. the "bubble") with an oblong shape. This form also ensures that Aberporth Range Head remains inside the D201 complex (see Figure 5).

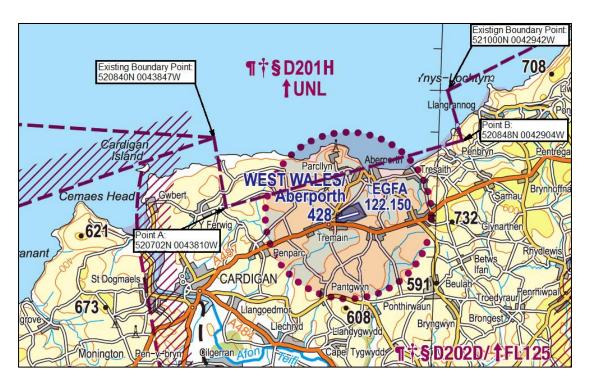


Figure 5: Proposed re-alignment of D201 - D202 boundary in the vicinity of WWA

- 2.22 The new boundary will follow the line 1 NM offset and parallel to the main runway at WWA between points A and B, which are located on the current D201E boundary (i.e. a circle of 3 NM radius centred on Aberporth Range Head). This aligns exactly with the northern edge of the area delegated to WWA under the LOA with MOD.
- 2.23 Straight lines connect points A and B to the existing D201 boundary, instead of the 3 NM arc that currently exists. This will simplify the D201/D202 airspace boundary.
- 2.24 The 10 NM² part of D201E that is transferred to D202 would be capped at FL125 to accord with the current EG D202 design. Hence, removal of the 'Occasionally Unlimited' assignment would effectively relinquish segregated airspace.
- 2.25 The 6 NM² part of D201E absorbed into the adjacent D201H sub-division will retain the unlimited (UNL) upper limit; however, this will be capped at FL180 (or lower) subject to the trials activity requirements. This would mean that the small additional area could actually be activated higher than currently; however, civil traffic rarely flies over this area due it being the Range site.
- 2.26 The introduction of WWR has improved both the flexibility and utilisation of the airspace, however, the current configuration regularly creates unnecessary limitations in that:

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- A Danger Area complex can only be managed by one Air Traffic Service Unit (ATSU) at a time. Therefore, WWR cannot manage D201E if it has been notified active along with the rest of the D201 complex which is being managed by MOD Aberporth RAC.
- Air Traffic Services (ATS) to BVLOS operations out of WWA where a service is provided by WWR cannot operate inside EG D201 concurrently with other MOD activities. An alternative for WWA in this instance would be to utilise EG D202 under the management of WWR. However, operations out of WWA when D201E is active, are confined to 5,000 feet, therefore restricting a UAS from carrying out a climb over the airfield (to enable safe recovery) before it enters the D202 complex at FL100.
- 2.27 When EG D201 is activated, D201E is also activated. However, if during the day there becomes no further MOD requirement for the EG D201 airspace, by default, all of the notified airspace is de-activated. However, WWA may still require D201E to continue its own operations. Such a circumstance then demands a replacement NOTAM to re-activate D201E. This change will streamline the booking system and negate multiple additional NOTAMs being issued.
- 2.28 The proposed change would bring the following safety benefits:
  - The A487 road becomes a prominent navigation feature for use by VFR traffic, In that VFR traffic would now use the A487 as a navigational feature to remain outside of D201H and therefore reduce the liklehood of DA infringement.
- 2.29 The proposed change would bring the following operational benefits:
  - Current operations for UAS from WWA require activation of both D201E and D202 when utilising either the D201 or D202 complexes. In the future this will be simplified as just D202D and whichever other areas are required – probably D201H and not the whole of D201.
  - Activation of D201 airspace will no longer directly impact upon WWA, thereby simplifying coordination between ATSU's.
  - Less administration associated with the NOTAM process.
  - D201 airspace can be managed by any MOD third party such as the RN without the risk of restricting air movements in and out of WWA.
  - More Flexible Use of Airspace (FUA) as the part of D201E transferred to D202 no longer has 'occasional unlimited' upper limit, and will be limited to FL125.
  - The LoA between WWA and MOD for the delegation of D201E airspace can be retired.
  - Less complexity simpler to manage both D201 and D202 operationally.
- 2.30 Based on the current situation described above, it can be argued that the proposed change to the D201/D202 boundary in the vicinity of WWA is fully justified on the grounds of FUA and in simplifying current booking procedures and use for all.

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## 3. Airspace Description

- 3.1 This section provides a summary description of the proposed changes in detail, including adoption of the standardised DA naming convention.
- 3.2 Table 1 lists the changes to DA designations, and the airspace blocks within the D201 and D202 complexes as a result of the proposal. Note: There is no change to airspace classification, as all of the airspace below FL195 remains Class G.

Current AIP Designation	Proposed AIP Designation	Notes	
EG D201	(Deleted)		
EG D201A	EG D201A	No change	
EG D201B	EG D201B	No change	
EG D201C	EG D201C	No change	
EG D201D	EG D201D	No change	
EG D201E	(Deleted)		
EG D201F	EG D201F	No change	
EG D201G	EG D201G	No change	
	EG D201H	As EG D201 south of 5230N plus 6 NM <sup>2</sup> of former D201E	
	EG D201J	As EG D201 north of 5230N	
EG D202	(Deleted)		
EG D202A	EG D202A	No change	
EG D202B	EG D202B	No change	
EG D202C	EG D202C	No change	
	EG D202D	As former EG D202 plus 10 NM <sup>2</sup> of former D201E	

Table 1 – Summary of Proposed Changes to Danger Areas

3.3 The associated airspace changes undergoing change are described below.

### **EG D201**

3.4 Delete entry within ENR 5.1

#### **EG D201E**

- 3.5 Delete entry within ENR 5.1
- 3.6 The current LOA between WWA and MOD Aberporth associated with relating to the delegation of D201E to WWA can be retired.

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#### **EG D201H**

3.7 The lateral limits of the proposed D201H will be that part of the current EG D201 south of latitude 523000N plus an additional 6 NM<sup>2</sup> currently part of D201E (see Figure 5). The WGS84 coordinates are:

```
523000N 0051806W - 523000N 0041200W - 521600N 0041200W - 521000N 0042942W - 520848N 0042904W - 520702N 0043810W - 520840N 0043847W - 520903N 0050057W - 523000N 0051806W
```

- 3.8 Upper/Lower limits are UNL/SFC. At times when the full limits are not required airspace will only be activated to levels as required. When operating Watchkeeper UA only, the airspace will only be activated to FL180, to allow for continued operations on the ATS route L18/UL18.
- 3.9 Hours of operation: Activated by NOTAM.
- 3.10 Proposed changes to the AIP are set out at Annex B.
- 3.11 In view of the nature of use of the airspace, in line with SARG Policy Statement dated 22 August 2014 (Special Use Airspace-Safety Buffer Policy for Airspace Design Purposes) buffers would be required in this case, however, by restricting the upper level of WWA UAS activity within D201H to FL180, L18 will be available for flight planning from FL200 after the buffer has been applied by the AMC.
- 3.12 In respect of M17, current ATS operating procedures are already in place for application of a 3 NM lateral separation of aircraft (whether unmanned or manned) from the common boundary of M17 and parts of the D201 complex, if the aircraft is at FL125 or above, through the operational management LOA. This requirement will remain for D201H operations.
- 3.13 A number of LOAs are currently in place relating to the activation and management of EG D201. These will need to be amended to refer to D201H.
- 3.14 As D201H is a sub-division of an existing Danger Area it will remain in compliance with applicable ICAO SARPs and any UK notified differences.

#### **EG D201J**

3.15 The lateral limits of the proposed EG D201J will be that part of the current EG D201 north of latitude 523000N. The WGS84 coordinates are:

```
530300N 0053000W - 530300N 0045319W - 524500N 0045319W - 524500N 0044018W - 523316N 0041200W - 523000N 0041200W - 523000N 0051806W - 524417N 0053000W - 530300N 0053000W
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- 3.16 Upper/Lower limits are UNL/SFC.
- 3.17 Hours of operation: Activated by NOTAM.
- 3.18 A number of LOAs are currently in place relating to the activation and management of EG D201. These will need to be amended to refer to D201J.
- 3.19 As D201J is a sub-division of an existing Danger Area it will remain in compliance with applicable ICAO SARPs and any UK notified differences.

#### **EG D202**

3.20 Delete entry within ENR 5.1

#### **EG D202D**

3.21 The lateral limits of the proposed D202D will be that part of the current EG D202 plus an additional 10 NM<sup>2</sup> currently part of D201E (see Figure 5). The WGS84 coordinates are:

520840N 0043847W - 520702N 0043810W - 520848N 0042904W - 521000N 0042942W - 521250N 0042121W - 520019N 0042519W - 515840N 0043902W - 520555N 0044130W thence clockwise by the arc of a circle radius 5 nm centred on 520653N 0043334W to 520801N 0044128W - 520840N 0043847W

- 3.22 Upper/Lower limits are FL125/SFC.
- 3.23 Hours of operation: Activated by NOTAM.
- 3.24 Proposed changes to the AIP are set out at Annex B.
- 3.25 An LOA is currently in place relating to the activation and management of D202 airspace. This will need to be amended to refer to D202D.

## 4. Supporting Infrastructure/Resources

4.1 Currently approved ATS resources used to manage the existing D201 and D202 airspace can continue to be utilised. These include "Aberporth Radar", "West Wales Information" (AFIS) and "West Wales Radar" (APS).

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- 4.2 The proposed changes will not increase the lateral or vertical coverage requirements for ATS surveillance or RTF communication within the D201 and D202 DA complexes.
- 4.3 In the case of WWR, ATS surveillance using PSR and SSR sited at WWA has a 60 NM range, and the Designated Operational Coverage (DOC) of VHF communications on 127.090 MHz is 60 NM, 22,500 ft. D201H airspace extends to a distance of 36 NM from WWA, hence adequate surveillance and RTF coverage is ensured.
- 4.4 In accordance with unit SMS procedures, radar video maps will be amended to reflect airspace boundary changes notified through the AIRAC cycle.
- 4.5 Existing operating and contingency procedures used by MOD Aberporth Radar, West Wales Information and West Wales Radar will be amended to refer to D201H, D201J and D202D.

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## 5. Operational Impact

- 5.1 This section assesses the operational impact of the proposal with regard to:
  - IFR General Air Traffic (GAT)
  - VFR General Aviation
  - Operational Air Traffic (OAT)
  - Local aerodromes
  - Other specific activities

#### **IFR GAT**

- 5.2 As stated in paragraph 2.10, activation of EG D201 has an impact on IFR GAT traffic. If EG D201 is activated up to unlimited height, L18 is unavailable and IFR GAT must use other routes.
- 5.3 The creation of D201H will largely overcome this issue, except on the occasions where unlimited height is required for hazardous trials. Furthermore, and as explained in paragraph 3.11, the routine activation of D201H up to FL180 will not impact on L18, which has a base of FL195 between LANON and BADSI.

#### **VFR General Aviation**

- 5.4 Flight into WWA necessitates the possible crossing of two active Danger Areas, managed by different agencies before entering the WWA ATZ.
- 5.5 The proposed removal of D201E and the re-alignment of the D201/D202 boundary in the vicinity of WWA will simplify VFR navigation as the A487 road can be used as a prominent feature that is outside of the D201 complex (see *graphic at Annex C*).
- 5.6 In summary, the proposed changes are expected to benefit VFR GA, with no adverse impact from currently.

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#### **Operational Air Traffic (OAT)**

- 5.7 OAT is a significant user of the airspace in question, both in terms of DA activity and the North Wales Military Training Area (NWMTA) which overlaps with the D201 complex (see Annex A).
- 5.8 Given that the combined lateral and vertical extent of the D201 and D202 complexes is no larger, the proposed changes should have no adverse impact on OAT.
- 5.9 Furthermore, the ability to only activate D201H (rather than the whole of EG D201) should reduce the number of occasions when activation of the southern portion of the NWMTA is in contention with D201.

#### **Local Aerodromes**

- 5.10 In addition to WWA (EGFA), licensed aerodromes within 30 NM of the airspace in question are Haverfordwest (EGFE), Pembrey (EGFP) and Caernarfon (EGCK).
- 5.11 Whilst there are no GA aircraft based at WWA, aircraft from the other airfields regularly utilise WWA and operate in the West Wales area, particularly along the Cardigan Bay coastline.
- 5.12 The proposed changes (i.e. removal of D201E and re-alignment of the D201/D202 boundary in the vicinity of WWA) will simplify flight planning and Airspace use for GA aircraft from local airfields.
- 5.13 The proposed changes will have a positive impact on WWA due to the improved access and egress.
- 5.14 No adverse impact on local aerodromes has been identified.

#### **Other Specified Activities**

- 5.15 This category includes the operation of UA from WWA, as well as trials and hazardous activities conducted inside the D201 complex.
- 5.16 With regard to UA activities from WWA, the proposed change should have no adverse impact given that the combined lateral and vertical extent of the D201 and D202 complexes is unchanged, and all sub-divisions within D201 remain available to UA operations if required.
- 5.17 The proposed changes will provide more flexibility for adjacent operations within the D201 and D202 complexes, as the two complexes can be managed fully independently.
- 5.18 The same is true for trials and hazardous activities; hence no adverse impact has been identified.

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## 6. Safety Management

- 6.1 The controlling authorities for the airspace in question (MOD Aberporth RAC, WWR and WWA) are certified ANSPs that have approved Safety Management Systems (SMS) in place.
- 6.2 In applying the SMS, ANSPs will ensure that all relevant documentation and procedures will be amended to reflect the proposed change (following Regulatory Decision). Furthermore, the SMS will ensure that a safety assessment associated with implementation and transition is undertaken using the CAP760 process.
- 6.3 Given the interaction between Units necessary to operate and manage the airspace, it is essential that MOD Aberporth RAC, WWR and WWA work together to produce a single safety assessment. This would take place after Regulatory Decision and prior to implementation.

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## **Annex A – Airspace Charts**

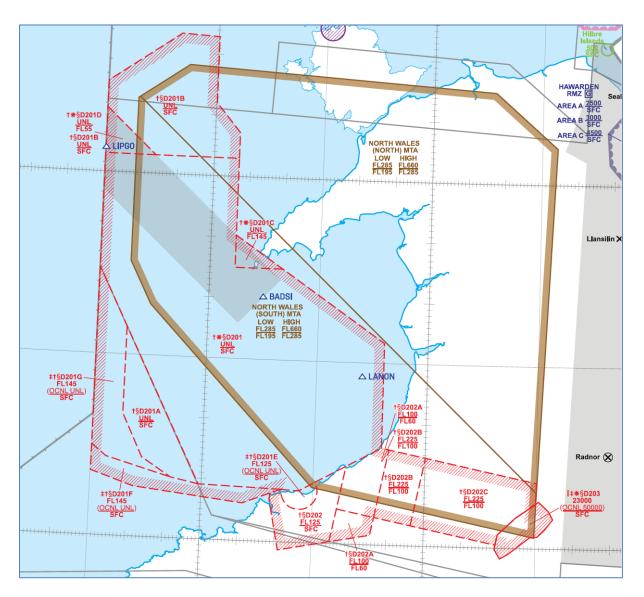


Figure A-1: Existing D201, D202 Airspace

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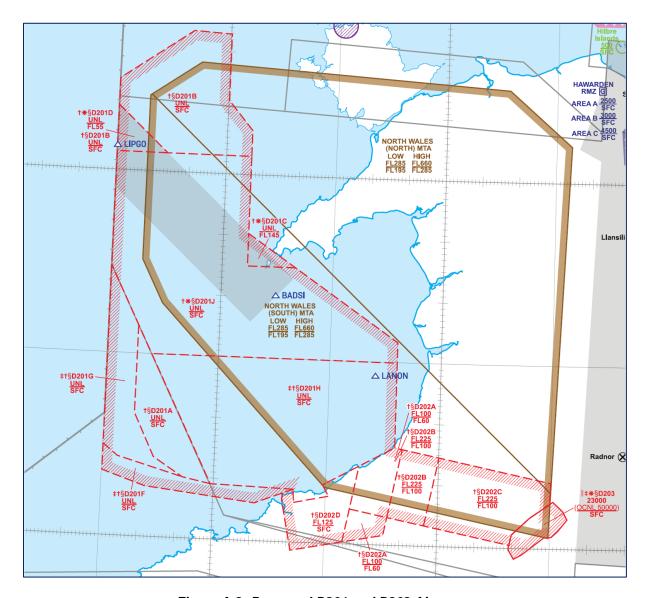


Figure A-2: Proposed D201 and D202 Airspace

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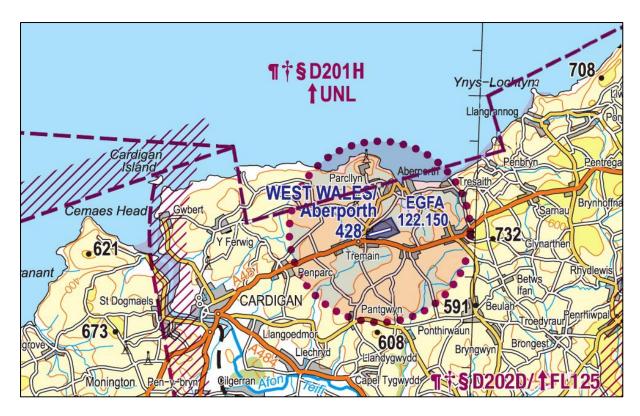


Figure A-3: Proposed D201H and D202D Airspace Boundary in the vicinity of WWA

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# Annex B – AIP Entry (ENR 5.1)

Delete entries for EG D201, EG D201E and EG D202.

Insert the following new entries:

Identification and Name Lateral Limits	Upper Limit Lower Limit	Remarks (time of activity, type of restriction, nature of hazard, risk of interception)
1.	2.	3.
EG D201H ABERPORTH 523000N 0051806W – 523000N 0041200W - 521600N 0041200W – 521000N 0042942W - 520848N 0042904W – 520702N 0043810W- 520840N 0043847W – 520903N 0050057W- 523000N 0051806W	Upper limit: UNL Lower limit: SFC	Activity: Live Firing / Bombing / Pilotless Target Aircraft / Unmanned Aircraft System (VLOS/BVLOS) / Supersonic Flight / Target Towing / Balloons / Surface Explosions / Air Firing / Torpedo Dropping / High Energy Manoeuvres.  Hours: Activated by NOTAM.  Service: DACS: Aberporth Radar on 119.650 MHz / 338.925 MHz, or West Wales Radar on 127.090 MHz. DAAIS: West Wales Information on 122.150 MHz  Contact: Pre-flight information: Range Control, Tel: 01239 813219 or West Wales Airport 01239 811100.  Remarks: SI 1976/64.  Danger Area Authority: DE&S.

Identification and Name Lateral Limits	Upper Limit Lower Limit	Remarks (time of activity, type of restriction, nature of hazard, risk of interception)  3.
EG D201J ABERPORTH 530300N 0053000W - 530300N 0045319W - 524500N 0045319W - 524500N 0044018W- 523316N 0041200W - 523000N 0041200W- 523000N 0051806W - 524417N 0053000W- 530300N 0053000W	Upper limit: UNL Lower limit: SFC	Activity: Live Firing / Bombing / Pilotless Target Aircraft / Unmanned Aircraft System (VLOS/BVLOS) / Supersonic Flight / Target Towing / Balloons / Surface Explosions / Air Firing / Torpedo Dropping / High Energy Manoeuvres.  Hours: Activated by NOTAM.  Service: DACS: Aberporth Radar on 119.650 MHz / 338.925 MHz, or West Wales Radar on 127.090 MHz. DAAIS: West Wales Information on 122.150 MHz  Contact: Pre-flight information: Range Control, Tel: 01239 813219.  Remarks: SI 1976/64.  Danger Area Authority: DE&S.

Identification and Name Lateral Limits	Upper Limit Lower Limit	Remarks (time of activity, type of restriction, nature of hazard, risk of interception)
1.	2.	3.
EG D202D WEST WALES	Upper limit: FL125	Activity: Unmanned Aircraft System (VLOS/BVLOS)
520840N 0043847W - 520702N 0043810W - 520848N 0042904W - 521000N 0042942W - 521250N 0042121W - 520019N 0042519W	Lower limit: SFC	Hours: Activated by NOTAM.
515840N 0043902W – 520555N 0044130W		Service: DACS: Aberporth Radar on 119.650 MHz / 338.925 MHz,
thence clockwise by the arc of a circle radius		or West Wales Radar on 127.090 MHz. DAAIS: West Wales
5 nm centred on 520653N 0043334W to 520801N 0044128W - 520840N 0043847W		Information on 122.150 MHz
		Contact: Pre-flight information: Range Control, Tel: 01239 813219 or West Wales Airport 01239 811100.
		Remarks: Pilots will be required to comply with ATC instructions whilst crossing EG D202D and will be provided with an appropriate Flight Information Service. Pilots who may be unable to comply with ATC instructions should not request a crossing clearance.
		Danger Area Authority: DE&S.

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# **Annex C – Supplementary Information**

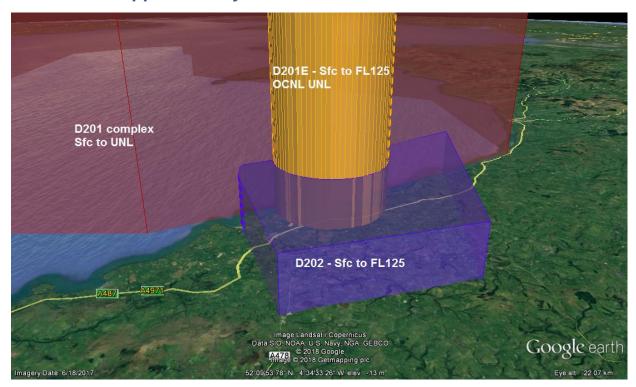


Figure C-1: 3D view of D201 complex and D202 today

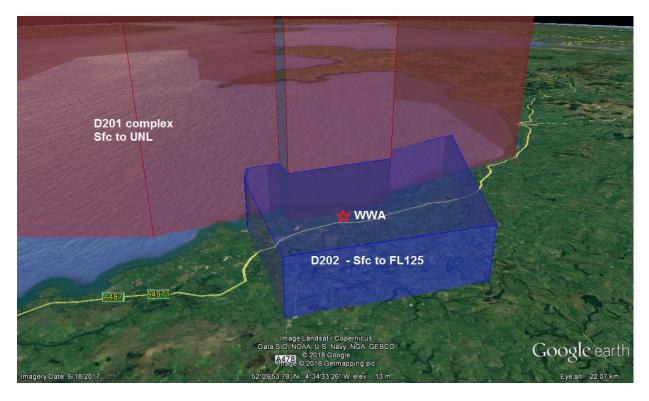


Figure C-2: 3D view of D201 complex and D202 as proposed

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## Area NM<sup>2</sup>

	D201 Complex	D202 Complex	Combined Area
Current Airspace	2,386	445	2,831
After Re-alignment	2,376	455	2,831
Change in area	-10	+10	0
Change in area (%)	-0.04	+2.2	0

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