

Airspace Change Manager
B498 Room 117
MOD Boscombe Down
Salisbury
SP4 OJF

24 September 2008

Dear Sirs,

ACP for Unmanned Aircraft – Consultation Response by LAA

Thank you for consulting the Light Aircraft Association (LAA) on your proposed ACP for unmanned aircraft. The LAA has some 8000 members and regulates over 2000 recreational and homebuilt aircraft on behalf of the CAA. LAA members operate mainly in day VFR condition but our aircraft fleet ranges from historic examples to modern high performance aircraft with sophisticated navigation systems. Pilot experience and qualification also covers the full spectrum of professional and amateur. Because of our role, we have a high regard for air safety and we take a broad view on airspace matters generally. In considering airspace change proposals we expect airspace to be utilised in a safe and efficient manner taking into account the needs of all users. The airspace affected by this change is used by pilots from many parts of the country so this is not just a local issue.

The LAA recognises the national interest in operating the Watchkeeper and successor systems in the Salisbury Plain danger area complex and supports the proposal to establish protected airspace in the form of danger areas.

We understand that there may only be one air vehicle available for training use so it is clear that utilisation of the proposed airspace would be very poor. We were therefore pleased to see that the MOD intends a crossing service which would mitigate the loss of airspace for other airspace users. We are aware that there are concerns about the legal position on danger area access and about the utility of the current activity information and crossing service available from Salisbury operations. We believe that it is important that the MOD be seen to resolve this and the normal way would be to hold a meeting with key stakeholders and DAP to identify and resolve the issues.

It may be that the provision of a useful service will have financial implications so we request that you hold such a meeting very soon and before this change goes forward for final decision.

We have one area of concern with the consultation. Paragraph 3.1.4 notes that whilst it is intended that Watchkeeper will operate from Upavon, it may operate from Boscombe Down or tactically from other sites. Although it is not discussed in the consultation, we now know that Watchkeeper must operate from a prepared surface but that does not exist at Upavon. We also understand that the MOD has no budget to construct a runway so their basing proposal is fanciful. Watchkeeper will have to be based at Boscombe Down requiring additional low level danger areas in this crowded airspace creating significant access implications for aviation stakeholders. Moreover, the issue of UAV congested area overflight during launch and recovery at Boscombe is not mentioned in the consultation document so that local authorities, MPs and the public may reasonably think that they have been misled on this aspect. In particular, the statement at paragraph B6 that "Watchkeeper is always capable of returning to its nominated landing site" is not true during launch and possible during recovery. Given a permanent basing in a more populous area outside the existing range, this becomes relevant. At this stage it is likely that environmental stakeholders are unaware of the basing change and its implications. We take the view that it might be better to inform them of this and how you intend to proceed rather than letting the information leak out later and cause a hiatus.

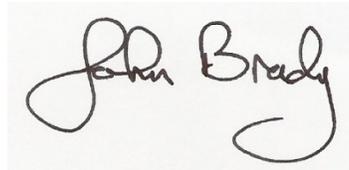
Although in a statement issued through QinetiQ on 18 September, the MOD said "*There remains an aspiration to build a hardened runway at Upavon*", with no funding currently in core and given the current parlous state of defence finance, it is inconceivable that such expenditure would ever be approved when a lower cost alternative is available. MOD must now accept that Boscombe Down is, to all intents and purposes, a permanent base and consult accordingly. In its statement the MOD also said that "*Should it become necessary to switch Watchkeeper operations from Upavon to Boscombe Down then the airspace issues will be addressed in accordance with due process and consultation with other airspace users will be undertaken.*" This is the reality of the situation so a second round of consultation must now take place on the necessary launch and recovery airspace and this will need to be done quickly if the ISD is not to be delayed. Incidentally, we believe that it would be inappropriate to establish a TRA at Boscombe Down as that would pre-judge any consultation outcome and might force DAP

to agree an airspace design which was not optimal. Because the launch and recovery phases will be quite short, we believe that it should be possible to arrange this additional airspace to satisfy the operational requirement of MOD whilst allowing good access for other airspace users. Although aviation stakeholders were not greatly involved in developing the current ACP we believe we can contribute positively to a supplementary proposal and would like to make the LAA available to participate. If this is to be done quickly, involving aviation stakeholders at the outset is likely to expose and resolve issues before a further consultation.

In summary, we support the proposed airspace design subject to resolving the issues relating to an activity and crossing service. We were disappointed that the consequences of the basing change were not set out in the current consultation but we are ready to work with you in developing a supplementary design that will meet the needs of all aviation stakeholders.

We believe you should notify environmental stakeholders about the basing change and its consequences before that becomes a problem.

Yours Sincerely



John Brady
Vice-Chairman