

MINUTES OF THE KEEVIL AIRFIELD TEMPORARY AIRSPACE CHANGE PROPOSAL MEETING HELD VIRTUALLY OVER SKYPE ON 24 JUN 20

24 Jun 20

Present	Appointment	Representing
[REDACTED]	Chairman / Airspace Regulator (Utilisation)	CAA
[REDACTED]	Principal Airspace Reg (Utilisation)	
[REDACTED]	Principal Airspace Reg (Engagement and Consultation)	CAA
[REDACTED]	SO2 Airspace Strategy	CAA
[REDACTED]	[REDACTED]	DAATM
[REDACTED]	Watchkeeper Force [REDACTED]	47 Regt RA
[REDACTED]	Project Officer (Sponsor)	WKF
[REDACTED]	Project Team	47 Regt RA

CAA Assessment Meeting Opening Statement

CAA noted that the Statement of Need, meeting agenda and presentation were received in advance of the Assessment Meeting and confirmed that the documents would be published together with minutes of the meeting on the Airspace Change portal page. CAA explained the purpose of the meeting and confirmed that the meeting was an Assessment Meeting and not a Gateway. The CAA reinforced that the sponsor was required to provide a broad description of their proposed approach to meeting the CAA's CAP 1616 requirements, but the CAA was not deciding whether the proposed approach met the detailed requirements of the CAA's process at this stage. The purpose of the Assessment Meeting (set out in detail in CAP 1616) was broadly:

- for the Sponsor to present and discuss their Statement of Need,
- to enable the CAA to consider whether the proposal concerned falls within the scope of the temporary airspace change process.

Additionally, the sponsor was required to provide information on how it intended to fulfil the requirements of the temporary airspace change process and to provide information on timescales.

	ACTION
<p>Item 1 – Introduction</p> <p>1. The Chairman opened the meeting and the participants introduced themselves.</p> <p>2. The Chairman reiterated the need for meeting minutes to be produced and a Sponsor redacted version to be uploaded to the CAA portal within 2 weeks along with a redacted version of the assessment meeting presentation.</p>	Sponsor

<p>Item 2 – Statement of Need</p> <p>3. The Sponsor presented the statement of need to the participants, explaining that in order to operate the Watchkeeper (WK) Unmanned Aerial System (UAS) Beyond Visual Line of Sight (BVLOS), a Temporary Danger Area at Keevil Airfield is required.</p> <p>4. The Chairman confirmed that the Statement of Need qualifies for consideration under the Airspace Change Proposal process and the meeting may continue. The proposal will follow a scaled process, aligned to the CAA's TDA policy statement. Stages 1a, scaled stage 3 (in the form of targeted engagement), 4, 5 and 6 apply.</p> <p>5. The Chairman asked if the Sponsor may explain how Watchkeeper is currently operating in Salisbury Plain Training Area (SPTA) and what airspace it currently operates in.</p>	
<p>Item 3 – Issue or Opportunities arising from Proposed Change</p> <p>6. The Sponsor stated that the timescale to achieve the TDA activation by September relied on very prompt action from the Sponsor at every stage of the ACP process, but is required to avoid poor weather in Q3 and Q4 of 2020.</p> <p>7. The Sponsor continued that Keevil Airfield is predominantly used by Military aircraft or by a Service Gliding Club. The area is highlighted on VFR charts as an active military airfield (designated Drop Zone) which General Aviation pilots already advised to avoid low overflight of. The deployment will also allow for the assessment of suitability of Keevil for a possible future permanent ACP.</p> <p>8. The Chairman requested that the Sponsor explains what the current intent is for a future permanent ACP.</p> <p>9. The Sponsor explained that the resulting output from Keevil during the TDA activation period will determine the suitability of Keevil as a permanent BVLOS UAS flying location, which will in turn influence the decision to submit a permanent ACP in the future.</p> <p>10. The Chairman asked if there are any Safety impacts or Operational and Technical impacts on operating from Keevil airfield.</p> <p>11. The WKF ██████████ explained that WK is mandated to avoid overflight of congested areas. D120 (BDN ATZ) where WK currently operates from is more densely populated compared to the proposed Keevil TDA and would therefore reduce the risk held by the chain of command significantly.</p> <p>12. The Chairman asked if there is any economical or environmental impact on operating at Keevil.</p> <p>13. The Sponsor explained that the MOD is exempt from the</p>	

<p>Environmental assessment however explained that it is assessed that only a negligible change in current air traffic routing will be required, therefore minimising the environmental impact.</p>	
<p>Item 4 – Option to exploit opportunities or address issues identified</p> <p>14. The Sponsor stated that we already operate from established airfields and have done so in the past, specifically Boscombe Down, Akrotiri, West Wales Airport and the Ascension Island. Operating from a less established airfield like Keevil will allow for the development of deployment procedures in a tactical land environment. Operation from Keevil will also allow WK to expedite transit into its primary operating area of D123 over Salisbury Plain which has already been designated for BVLOS operations. This will allow for better integration with land units training on SPTA.</p> <p>15. The Sponsor continued that they intend to address the issues resulting from the short timelines by utilising a robust engagement strategy. The Sponsor has also already drafted the TDA Proposal which is ready for engagement.</p> <p>16. The Chairman requested Airspace Reg (Consult) to clarify the difference between Consultation and Engagement.</p> <p>17. Airspace Reg (Consult) explained that what is required from the Sponsor is a “Targeted Engagement” exercise in this instance, as a “Consultation” has legal connotations and common characteristics – ie, normally 12 weeks in length. Due to the proportionality being applied with a TDA, the CAA requires the Sponsor to conduct a “Targeted Engagement” exercise. This normally last 6 weeks, but can be scaled to less with appropriate rationale, for example if prior engagement has already been conducted. The CAA does not need to review the Engagement Strategy, but should the Sponsor want to forward it, Airspace Reg (Consult) will review and provide comment.</p> <p>18. The Chairman requested from the Sponsor that any reference to “Consultation” in any documents be changed to “Engagement” to align to the TDA policy statement engagement requirements and not to confuse stakeholders with the requirements of full CAP1616 process.</p>	<p>Sponsor</p>
<p>Item 5 – Provisional indication of the level and process requirements under CAP1616 or handling of changes under CAP 1618</p> <p>19. The Chairman confirms that this fell within the CAP 1616 process. Accordingly, due to this being a Temporary ACP, no level will be assigned.</p> <p>20. The Chairman agreed to forward Agenda Item 4 on to the Sponsor, which will assist in guiding the Sponsor through the</p>	<p>Chairman</p>

subsequent stages. The Sponsor is able to immediately commence the engagement process next and does not need to wait for a next Gateway. Stages 1b, 2a and 2b of the airspace change process is not required for the purpose of the TDA application. Once all the documents are uploaded onto the Portal the Sponsor will be moved to Stage 4. During Stage 4 the Engagement techniques, responses and adjustments to the Proposal will be uploaded. In Stage 5 - Decision - the final airspace design is looked at and considered against the Engagement responses. The CAA will aim to reach a decision in 28 days from final Proposal submission.

21. The DAATM enquired if there is a formal Decide Gateway, or if decision are made outside of the dates published in the workflow.

22. Airspace Reg (Consult) confirmed that there is no Decide Gateway date and that the CAA make decisions as soon as the Sponsor has submitted the finalised Documents. The published workflow chart on p90 is incorrect and in the process of being updated.

23. The Chairman added that the only date that the CAA is beholden to is the Regulator's Calendar.

24. The Chairman enquired whether there is a different safety assessment procedure that the Sponsor must follow when deploying to a new location.

25. The WKF ■ explained that they are currently engaged with an internal compliance consultation with the MAA for operating at the proposed location. Specifically, regarding the requirement under RA2320 (Role Specific Remotely Piloted Air Systems) to comply with the Layered Safety approach.

26. The Chairman stated that the CAA will publish the final decision via the Sponsor provided email and also on the Portal. The Sponsor must submit the AIC request. The Chairman noted that the Sponsor may not have drafted AICs before and offered to assist the Sponsor and DAATM with the drafting of the AIC. The NOTAM request responsibility will be confirmed in the CAA decision letter.

27. The DAATM enquired if there is a specific layout of the AIC that the Sponsor and DAATM may use as a guide to draft theirs and whether the NOTAMS submission may be submitted directly from the Regiment.

28. The Chairman stated that there are a number of AICs for TDAs for UAS on the NATS website, but that they will forward an example of an AIC to the DAATM. The Chairman continued that the CAA aims to implement an arrangement with NATS AIS to allow the Sponsor to submit their NOTAMS directly, but due to COVID impacts it has not always been allowed. The Sponsor should therefore plan to submit their NOTAMS through the Airspace Regulation Operations team.

29. The DAATM agreed that utilising the Airspace Regulation

Chairman

Operations team to submit the NOTAMs may be beneficial due to the Airspace Regulation Operations team experience with monitoring NOTAMs submission.

30. The Chairman stated that using the Airspace Regulation Operations team will not delay the submission of NOTAMs and that as long as they receive the NOTAM request D-1 day, it will be sufficient warning. For weekend operations, the request must be sent by the preceding Friday. For Monday operations, the request must be sent by the preceding Friday.

31. The Sponsor stated that presently, they are not intending to operate over weekends in order to allow other airspace users more freedoms.

32. The Chairman requested from Airspace Reg (Consult) to clarify if there is a requirement to assess the impact on traffic patterns below 7000 feet and noted that due to this being a Military request, it may not be required.

33. Airspace Reg (Consult) confirmed that due to this being a Military activity, an impact assessment is not required but did request that the Sponsor considers how they will inform the local community of this impact should this proposal be approved.

34. Airspace Reg (Consult) explained that the existing functionality on the Portal does not accurately reflect the procedures followed for a TDA application yet. Although the Sponsor's application will be progressed to Stage 4 without going through other stages, the Sponsor should still action the Engagement requirement within those stages, specifically the requirement for a Targeted Engagement period. The Sponsor must identify and record its relevant Stakeholders, identify how best to engage with them, the reasoning for selecting those stakeholders and how the raw data responses are collated and analysed. The Sponsor must also demonstrate how complaints will be captured and addressed during the implementation period.

35. Airspace Reg (Consult) continued that once feedback is received, a feedback report must be presented. The feedback must be broken down into two categories:

- a. Feedback that you have considered or that have shaped your final proposal, and
- b. Feedback that has been disregarded and the reason why.

36. Airspace Reg (Consult) requested if the Sponsor would like to talk through their current Engagement Strategy they are available to offer assistance.

37. The Sponsor highlighted its main Stakeholder already identified who they intend to brief personally (COVID dependant) on the planned TDA. Alternative online briefing methods will be utilised as a

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<p>secondary solution. The Sponsor identified its secondary Stakeholders will be contacted via email. In order to allow for more Stakeholders to be reached and informed, and to allow them to respond to our TDA Proposal, a website with a FAQ section and a Form will be utilised.</p> <p>38. Airspace Reg (Consult) noted that the current planned Engagement Methodology seems to be thorough and requested it to be sent to them for comment after the meeting. Airspace Reg (Consult) requested how long the Sponsor intends the Engagement Period to last.</p> <p>39. The DAATM commented that the worst-case scenario is 6 weeks, but due to prior engagement, the Sponsor is intending to do a 4-week engagement.</p> <p>40. Airspace Reg (Consult) stated that a 4-week engagement should be sufficient due to the prior engagement and that the rationale for only using a 4-week engagement must be included at the final submission.</p> <p>41. The Chairman agreed with the proportionality of the shortened Engagement Period, based on the prior engagement of Stakeholders. The Chairman confirmed that for the purpose of assessing the traffic patterns below 7000 ft, that there is already a note on the VFR Charts requesting pilots to avoid overflight of the airfield with 2000 ft vertically and 2 NM laterally.</p>	<p>Sponsor</p>
<p>Item 6 – Provisional process timescales if to be managed under CAP1616</p> <p>42. The Chairman confirmed that this ACP will fall within the CAP1616 process and requested whether the timescale provided at Item 6 is a worst-case scenario.</p> <p>43. DAATM confirmed that although the original timelines take into account a longer Targeted Engagement period but shorter CAA decision period, the event that will ultimately delay the Sponsors 7 Sep activation date of the TDA, will be the AIC release date of 24 Sep. The Sponsor will aim for the 24 Sep AIC release date and therefore the submitted dates are sufficient for each stage.</p> <p>44. The Chairman agreed that the timescales are sufficient to achieve the 24 Sep AIC.</p> <p>45. Airspace Reg (Consult) stated that she does not foresee an issue with the timescales.</p> <p>46. Principal Airspace Regulator (Utilisation) enquired into the impact of non-acceptance on WK operation.</p> <p>47. The [REDACTED] stated that due to the level of T&E</p>	

<p>activity at BDN WK is not generating the level of activity required. This results in a lack of output against Defence requirements. WK will be better placed to deliver these requirements if afforded greater airfield freedoms and airspace access.</p> <p>48. Full minutes of this meeting must be sent to the CAA for approval. A redacted version of this meeting will be uploaded onto the Portal.</p> <p>49. Airspace Reg (Consult) advised that the following information will need to be redacted from all documents to be uploaded to the Portal:</p> <ul style="list-style-type: none"> a. Names b. Emails c. Phone numbers or d. Any information that will be able to be used to identify a person (such as work titles if relevant) <p>50. The Chairman requested that in Item 6 of the presentation the word “Consultation” be replaced with “Engagement” to reflect the process outlined in the TDA policy statement.</p> <p>51. The Sponsor requested acknowledgement that the earliest date for first implementation is post the AIC release on 24 Sep.</p> <p>52. The Chairman confirmed that this was correct.</p>	
<p>Item 7 – Next steps</p> <p>53. The Chairman requested if there are any questions the Sponsor or DAATM would like to raise.</p> <p>54. The DAATM requested if the Sponsor will only send the Targeted Engagement Strategy to Airspace Reg (Consult) after the minutes have been reviewed, redacted and uploaded.</p> <p>55. The Sponsor stated they are ready to send it to Airspace Reg (Consult) after this meeting and will be looking to start engagement next week (wc 29 Jun 2020)</p> <p>56. Airspace Reg (Consult) confirmed that she will review it for comment immediately on receipt. The Sponsor should also not hesitate to contact the CAA team via the DAATM should they have any questions or require advice.</p> <p>57. The Chairman also noted that, due to the funnelling effect caused by SPTA and Bristol CTR, it may be worth preparing for questions from the general aviation community about the possibility for requesting a Crossing Service.</p> <p>58. The Sponsor confirmed that a Danger Area Crossing Service</p>	<p>Sponsor</p> <p>Sponsor</p>

<p>has already been agreed in principle with BDN ATC. The Sponsor will be able to send a draft proposal immediately for comment if required.</p> <p>59. The Chairman stated that he is happy to review this and provide comment and advice outside of the ACP process as part of Airspace Regulator Utilisation.</p> <p>60. The Chairman confirmed the next step for the Sponsor is to:</p> <ul style="list-style-type: none"> a. Submit the full minutes of the meeting to the CAA for approval. b. Once approved, upload a redacted copy onto the portal. 	<p>Chairman</p> <p>CAA / Sponsor</p>
<p>Item 8 – AOB</p> <p>61. The chairman enquired if there are any other points any of the participants would like to discuss.</p> <p>62. DAATM requested if the 90 Day TDA activated period must be consecutive or is it possible for periods to be “paused” due to the deteriorating weather expected.</p> <p>63. The Chairman confirmed that the CAA understands the urgent requirement for the Sponsor to train their crew, so it will be possible for the CAA to consider a pause on the 90-day period should it be required and requested in the future.</p> <p>64. The Sponsor thanked the CAA.</p> <p>65. The CO thanked the CAA and DAATM and appreciate the flexibility afforded, specifically regarding the possibility to request a pause to the 90-day period.</p> <p>66. The Chairman thanks all involved and concluded the meeting.</p>	

Original Signed

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