Keevil TDA - Redacted Stakeholder Email Feedback

Original Email Sent to all Stakeholders

On 1 Jul 2020, at 16:55, 47RA-Project-LOVERIDGE (MULTIUSER) < 47RA-Project-LOVERIDGE@mod.gov.uk wrote:

<Keevil Airfield Temporary Danger Area Proposal - 47 Regt RA.pdf>

Good afternoon.

Airspace Change Proposal ACP-2020-047

Please find attached a proposal by 47th Regiment Royal Artillery to establish a Temporary Danger Area over Keevil Airfield, Wiltshire in order to conduct Beyond Visual Line of Sight unmanned aircraft operations from September to December 2020.

Your feedback is welcome. This engagement period ends on **Friday 31**st **July**. Kind regards.

Talla logalao,
Project LOVERIDGE lead 47 th Regiment Royal Artillery Horne Barracks LARKHILL Wiltshire SP4 8QE Mil: Civ: MOD ^{NET} 47RA-Project-LOVERIDGE@mod.gov.uk
Response Emails received from Stakeholders
E1
Dear The Control of t
Thank you for your email, which I have passed on to three BHPA clubs that frequently operate in significant numbers on sites around the proposed affected area. I have also copied in our Airspace Liaison Officer.
Kind regards
Tel: Email: Web: www.bhpa.co.uk
British Hang Gliding and Paragliding Association (BHPA) Tel: Fax:
British Hang Gliding and Paragliding Association Limited. A company limited by guarantee and registered in England no Registered office:

Yes 0900 will work. If you come to our front gate and ring we will let you in.
Dropped pin Near High St, Melksham, Trowbridge https://
Regards
On 7 Jul 2020, at 08:58, 47RA-Project-LOVERIDGE (MULTIUSER) < 47RA-Project-LOVERIDGE@mod.gov.uk > wrote:
Good morning, No problem. Would 0900 work? Unfortunately is unable to attend but our CO, will attend. Kind regards,
XO 43 Battery 47 Regt RA MOD Boscombe Down Amesbury Wiltshire SP4 0JF Mil: Mob: MOD ^{NET}
From: Sent: 07 July 2020 08:02 To: 47RA-Project-LOVERIDGE (MULTIUSER) < 47RA-Project-LOVERIDGE@mod.gov.uk > Subject: Re: Temporary Danger Area Proposal - Keevil Airfield, Wiltshire - 47 Regt RA
Morning Sorry for the late response. I'll be at Semington in Thursday am. I have a meeting at 1000 for an hour or do but could do before or after? What works for you? Regards
On 6 Jul 2020, at 07:56, 47RA-Project-LOVERIDGE (MULTIUSER) < 47RA-Project-LOVERIDGE@mod.gov.uk > wrote:
Good morning , I was wondering if you have managed to check your availability for a meeting with us on the morning of Thursday 9 th ? If so, I will inform to ensure he can attend. I look forward to hearing from you. Kind regards,
XO 43 Battery 47 Regt RA MOD Boscombe Down Amesbury Wiltshire SP4 0JF Mil: MOD ^{NET}

Sent: 01 July 2020 18:20

From:

To: 47RA-Project-LOVERIDGE (MULTIUSER) < 47RA-Project-LOVERIDGE@mod.gov.uk >

Subject: Temporary Danger Area Proposal - Keevil Airfield, Wiltshire - 47 Regt RA

I have been forward your email and I am keen to have a chat about this proposal as any airspace restrictions that close to our operating base could have some significant restrictions on our operation response times. When might you be available for a chat?

Regards

Capt Chief Pilot Wiltshire Air Ambulance Good morning

A little belated thank you from Keevil Parish Council (and others) for the very informative discussion on Monday evening.

We would love to take you up on your offer of looking at your equipment when you think suitable.

Again our thanks,



Virus-free. www.avast.com

On Tue, 7 Jul 2020 at 11:00, 47RA-Project-LOVERIDGE (MULTIUSER) < 47RA-Project-LOVERIDGE@mod.gov.uk wrote:

Good morning _____,

Thank you again for giving us some time to discuss our plans with the Parish Council at your meeting last night. If you have any remaining questions please do not hesitate to ask.

We look forward to further engagement in due course and potentially look to offering the community the chance to come onto the airfield for a look around our equipment.

Kind regards,

| Project LOVERIDGE lead | 47th Regiment Royal Artillery | Horne Barracks | LARKHILL | Wiltshire | SP4 8QE | Mil: | Civ: | MOD^{NET} 47RA-Project-LOVERIDGE@mod.gov.uk

From: < >

Sent: 02 July 2020 09:15

To: 47RA-Project-LOVERIDGE (MULTIUSER) < 47RA-Project-LOVERIDGE@mod.gov.uk >

Cc:

Subject: Re: Temporary Danger Area Proposal - Keevil Airfield, Wiltshire - 47 Regt RA

Good morning captain Loveridge,

I thank you for the information on the use of Keevil Airfield in respect of unmanned aircraft.

We will be having a Zoom virtual Parish Council meeting next Monday, July 6th starting at 7.30 and was wondering if you or one of your colleagues might like to join us to explain the use a little further and perhaps answer questions?

If you could please let me know so that I can send you joining details.

Many thanks,

Clerk to Keevil Parish Council



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On Wed, 1 Jul 2020 at 17:24, 47RA-Project-LOVERIDGE (MULTIUSER) < 47RA-Project-LOVERIDGE@mod.gov.uk wrote:

Good afternoon,

Airspace Change Proposal ACP-2020-047

Please find attached a proposal by 47th Regiment Royal Artillery to establish a Temporary Danger Area over Keevil Airfield, Wiltshire in order to conduct Beyond Visual Line of Sight unmanned aircraft operations from September to December 2020.

Your feedback is welcome. This engagement period ends on Friday 31st July.

Please also find attached a letter of introduction and invitation for our team to brief the Parish Council as well as some frequently asked questions. Further community engagement will occur in conjunction with RAF Brize Norton.

I look forward to hearing from you.

Kind regards,



| Project LOVERIDGE lead | 47th Regiment Royal Artillery | Horne Barracks | LARKHILL | Wiltshire | SP4 8QE | Mil: | Civ: | MOD^{NET} 47RA-Project-LOVERIDGE@mod.gov.uk



Please book and myself in for Thursday 23rd July at 11:00am. Where do we need to go report in?

On Wed, 15 Jul 2020, 14:52 47RA-Project-LOVERIDGE (MULTIUSER), < 47RA-Project-LOVERIDGE@mod.gov.uk wrote:

Good afternoon

Thank you for your reply. As discussed on the phone, we would be more than happy to host you at our facility at MOD Boscombe Down. We can offer you a capability brief and a tour of our hangar followed by a discussion on our plans for operating from Keevil. We can offer the following dates and times:

- Tuesday 21st July at 1400hrs
- Thursday 23rd July at 1100hrs

Alternatively, we could host you at our Regimental HQ at Larkhill if that would be easier for you. We plan on having an open day in mid-September at Keevil so your members would have an opportunity to see our equipment then.

Due to our current COVID working situation may I ask that your visit is limited to 4 people.

I look forward to hearing from you.

Kind regards,



| XO | 43 Battery | 47 Regt RA | MOD Boscombe Down | Amesbury | Wiltshire | SP4 0JF | Mil: | Civ: | Mob: | Mob: | MOD^{NET}

From: <

Sent: 13 July 2020 20:26

To: 47RA-Project-LOVERIDGE (MULTIUSER) < 47RA-Project-LOVERIDGE@mod.gov.uk > **Subject:** Re: Temporary Danger Area Proposal - Keevil Airfield, Wiltshire - 47 Regt RA

Hi ,

Thank you for this information and sorry for the delay getting back to you.

Following discussion with our club chairman we would like to take up your offer of a meeting to discuss matters further for our clarification.

To this end could you offer some dates which would suit you and would you prefer to meet at your office in Larkhill or at Keevil Airfield?

On Wed, 1 Jul 2020 at 17:35, 47RA-Project-LOVERIDGE (MULTIUSER) < 47RA-Project-LOVERIDGE@mod.gov.uk wrote:

Good afternoon,

Airspace Change Proposal ACP-2020-047

Please find attached a proposal by 47th Regiment Royal Artillery to establish a Temporary Danger Area over Keevil Airfield, Wiltshire in order to conduct Beyond Visual Line of Sight unmanned aircraft operations from September to December 2020.

Your feedback is welcome. This engagement period ends on Friday 31st July.

Attached is also a letter of introduction and invitation for me and my team to brief you personally on our proposal, noting that you are a local user of the airfield and surrounding area.

Kind regards,



Best Regards

Director

Spire Digital Solutions Ltd



CAUTION: This message may contain both confidential and privileged information intended for the addressee named above. If you are not the intended recipient you are hereby notified that any dissemination, distribution or reproduction of this message is prohibited. If you have received this message in error please notify the sender immediately, then destroy the original message. Any views expressed in this message are solely those of the individual sender, except where the sender is specifically authorised by Spire Digital Solutions Ltd to state that they are the views of Spire Digital Solutions Ltd. We have taken steps to ensure that this e-mail and attachments are free from any virus, however, we advise that in keeping with good computing practice the recipient should ensure they are actually virus free.

Company Registered in England & Wales, N	No:	Registered address:	

Thanks for the quick response.

The one point I would make in addition is, wouldn't a lane between Keevil and Salisbury plain serve your purpose?

My other concern is that we have limited LARs in the area so in flight we are unlikely to get much help or warning.

But I do understand your needs and hope a satisfactory solution can be found

Sincerely



Sent from my BlackBerry — the most secure mobile device — via the O2 Network

From: 47RA-Project-LOVERIDGE@mod.gov.uk

Sent: 13 July 2020 16:13 **To:**

Subject: RE: Keevil Airspace Proposal

Good afternoon

Thank you for your feedback. Your response will be included in our proposal to the CAA as soon as the stakeholder engagement process has closed at the end of this month.

As you highlighted in your response and as a fellow GA pilot who often operates in this area, I fully accept that VFR traffic may be pushed further North towards Bristol CTA, particularly if pilots are used to navigating around the edge of the Salisbury Plain Danger Areas using the railway line or if operating at 2,000ft AMSL or below.

Our intent is to cause the smallest amount of disruption to other air users and aim to do this by:

- 1. Minimising our activity within the Keevil Temporary Danger Area thereby allowing transit by GA traffic through a Danger Area Crossing Service utilising the Frome to Devizes VRPs or navigating using the railway line.
- 2. Not activating the Danger Area over weekends or on weekdays when we know we will not be utilising the airspace.

I completely understand your objection to this proposal however this activity is deemed to be an essential training exercise which must be completed between September and December this year.

I appreciate your time and once again, thank you for your feedback. Kind regards,

| Project LOVERIDGE lead | 47th Regiment Royal Artillery | Horne Barracks | LARKHILL | Wiltshire | SP4 8QE | Mil: | Civ: | MOD^{NET} 47RA-Project-LOVERIDGE@mod.gov.uk

From: <

Sent: 10 July 2020 10:56

To: 47RA-Project-LOVERIDGE (MULTIUSER) <47RA-Project-LOVERIDGE@mod.gov.uk>

Subject: Keevil Airspace Proposal

Dear Sir

I am writing with respect to the recently published proposal for extended airspace for UAV activities at Keevil.

I operate a light aircraft from Dunkeswell and often fly close to Keevil en route to eastern destinations. On occasion I will follow the railway line to the south of Keevil, but more often use Trowbridge and Melksham as way points always at or below 2000' AMSL.

You must appreciate that GA pilots tend to avoid controlled airspace even when it is only activated occasionally. This is an unwarranted extension that will push my route even further north and let to further funneling of light aircraft.

We have already seen examples elsewhere of airspace 'grabs' to segregate UAVs from GA as 'sense and avoid' technology is still not sufficiently mature to allow mixed use.

I have to object to this proposal, as it would seem that it is designed for a limited purpose that takes away airspace access from, what you admit in the document, in para 14.1 is used frequently by aircraft routing around SPTA Danger Areas.

Sincerely
Phoenix Flying Group

Sent via BlackBerry Hub+ Inbox for Android

Firstly, thank you for affording Army Gliding Club (Wyvern) the opportunity to comment on this airspace proposal.

Of all the airspace proposals previously seen for Watchkeeper operations, this has the most minimal impact, appearing to meet the operational need without excessive detriment to other airspace users.

Additionally, given that it is between Sep to Dec, which is outside the gliding soaring season, and generally weekdays only, then its impact will be lessened further.

AGC(W) additionally comments:

- 1. Clarification of how AGC(W) gain access (transit) when it is active but not occupied, WK in D125.
- 2. Clarification of how booked activity is deactivated when sorties are cancelled due to weather or serviceability.
- 3. Controlling authority (for clearance and status).
- 4. Other than simplicity, it is not clear why the 2.5nm to the north is required when to access SPTA is to the south.
- 5. Assurance this will not be recycled in to a permanent feature.
- 6. Any additional period should go through a full airspace proposal again.



On 1 Jul 2020, at 17:48, 47RA-Project-LOVERIDGE (MULTIUSER) < 47RA-Project-LOVERIDGE@mod.gov.uk wrote:

Good afternoon,

Airspace Change Proposal ACP-2020-047

Please find attached a proposal by 47th Regiment Royal Artillery to establish a Temporary Danger Area over Keevil Airfield, Wiltshire in order to conduct Beyond Visual Line of Sight unmanned aircraft operations from September to December 2020.

Your feedback is welcome. This engagement period ends on Friday 31st July.

Attached is also a letter of introduction and offer to brief you personally on our proposal, should you wish.

I look forward to hearing from you.

Kind regards,

| Project LOVERIDGE lead | 47th Regiment Royal Artillery | Horne Barracks | LARKHILL | Wiltshire | SP4 8QE | Mil: | Civ: | MOD^{NET} 47RA-Project-LOVERIDGE@mod.gov.uk

<Keevil TDA - Engagement Letter.pdf><Keevil Airfield Temporary Danger Area Proposal - 47 Regt RA.pdf>

Thanks for your recent letter describing your temporary airspace change proposal.

This is the response from the British Gliding Association.

Safety

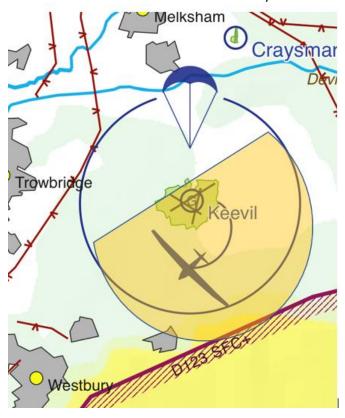
- Keevil is located in class G airspace between D123 and the Bristol CTR/CTAs through which GA and
 other traffic are routinely transiting. Where class G is reduced either temporarily or permanently, the
 MAC risk increases simply because the same number of aircraft are flying in a reduced amount of
 airspace.
- We welcome your key objective 'Use the minimum amount of airspace required to permit UAS operations in order to limit the impact to other air users'. We provide comment on how that objective can be achieved under 'design' below.
- See operational impacts and airspace management below.

Operational Impacts

- The area encompassed by the proposed TDA is utilised by soaring* gliders.
- The Bannerdown gliding club (RAFGSA) operates from Keevil airfield. We anticipate that the sponsor will engage directly with the Bannerdown gliding club to accommodate their needs.
- The wider operational impact of the proposed TDA will be to reduce the utility of the class G airspace and funnel transit aircraft, including gliders, to the north and north west of Keevil.

<u>Design</u>

- The area proposed could be adjusted to minimise the impact on transit traffic.
- The 2.5 nm circle from ground level to 3715 feel amsl is not justified in the proposal. It may be that a 2.5nm circle was convenient for the person drafting the proposal (the 2.5nm circumference intersects the nearby D123).
- We recommend that the proposed airspace could for a semi-circle segment surface to 2000 agl where the 2nm radius base of a semi-circle segment runs parallel to the 06/24 runway and the segment circumference crosses the boundary of D123. Please see the illustration below.



- We are particularly concerned that a design has been proposed without it being initially developed through stakeholder engagement.
- It is strongly recommended that the proposal takes into consideration the needs of established airspace users, and in particular those of local gliding clubs.

Airspace Management

We recommend that:

- The operator develops a close working relationship with the Bannerdown gliding club including mutually agreed operating, timing and contact protocols that will ensure minimum disruption to both that gliding club's activities and to those of the military.
- The operating times are clearly promulgated, including periods when the TDA is inactive (for example due to serviceability, operational needs and stand-downs).
- The proposed crossing service is not dependent on mode S transponder equipage.

Environment and noise

No comment.

Other Comment

- The military has significantly large areas of UK airspace allocated to its military training activities.
- We are disappointed that the military is now seeking to further expand its airspace footprint for development purposes and in doing so inconveniences other airspace stakeholders.

Kind regards

British Gliding association

From: 47RA-Project-LOVERIDGE (MULTIUSER) <47RA-Project-LOVERIDGE@mod.gov.uk>

Sent: 01 July 2020 16:54

To: | < | >

Subject: Temporary Danger Area Proposal - Keevil Airfield, Wiltshire - 47 Regt RA

Good afternoon.

Airspace Change Proposal ACP-2020-047

Please find attached a proposal by 47th Regiment Royal Artillery to establish a Temporary Danger Area over Keevil Airfield, Wiltshire in order to conduct Beyond Visual Line of Sight unmanned aircraft operations from September to December 2020.

Your feedback is welcome. This engagement period ends on Friday 31st July.

Kind regards,



^{*}see AIC Y036/2020 'Gliding activity in the UK'

Dear

Thank you for including the Friends of Steeple Ashton in your distribution. The Parish Council is listed as a stakeholder in your proposal document however they are of the view that the consultation is primarily focused on the technical and safety aspects of establishing the temporary danger area for drone operations, and assuming it is approved they will in due course - after the summer hiatus - disseminate information concerning your Watchkeeper operations on the airfield during the period September - December 2020. In the meantime, and in order to inform your consultation process, may I advise you that the Village takes a keen interest in both the history of Keevil airfield and its current use for military training, and is very supportive of its continuing contribution to defence. We look forward to welcoming 47th Regiment Royal Artillery and seeing Watchkeeper in operation.

I have copied in the Chair of Steeple Ashton PC to this consultation input.

Yours sincerely,

Chairman, The Friends of Steeple Ashton
----- Original Message ----On Wednesday, 1 Jul, 20 At 17:11, 47RA-Project-LOVERIDGE (MULTIUSER)<
47RA-Project-LOVERIDGE@mod.gov.uk> wrote:

Good afternoon

Airspace Change Proposal ACP-2020-047

Please find attached a proposal by 47th Regiment Royal Artillery to establish a Temporary Danger Area over Keevil Airfield, Wiltshire in order to conduct Beyond Visual Line of Sight unmanned aircraft operations from September to December 2020.

Your feedback is welcome. This engagement period ends on **Friday 31**st **July**.

Kind regards,

| Project LOVERIDGE lead | 47th Regiment Royal Artillery | Horne Barracks | LARKHILL | Wiltshire | SP4 8QE | Mil: | Civ: | MOD^{NET} 47RA-Project-LOVERIDGE@mod.gov.uk



Re Airspace Change Proposal ACP-2020-047

Watchkeeper proposed temporary restricted area at Keevil

Thank you for the opportunity to respond to this proposal.

I write on behalf of The Avon Hang Gliding and Paragliding Club (AHGPG). As you will know the Avon Club looks after free flying from Westbury (White Horse and Bratton Camp) for Hang Glider and Paraglider pilots. We enjoy excellent relations with Salisbury Plain operations, and can request various airspace concessions on D123, and also regularly check on the status of Keevil operation to see if the airspace is available to us. This working relationship is invaluable to us as a Club.

We currently have the facility to check on the operational status of Keevil, and to be able to fly into and over that airspace when advised that it is not in operation by the military. However, even with Keevil active, the current size of the airspace still allows GA (including free-flying pilots) to pass to the west of D123, 'squeezing' between it and Keevil. This air corridor is particularly important for cross-country flights for us as it opens up the potential for long flights to the NE when flying from Westbury. Pilots can also arrive near Keevil if flying cross country by taking off from Club sites to the north (Selsley, Leckhampton, Uffington, Combe Gibbet), or from Club sites to the south (Mere). Note, not all of these sites are Avon controlled sites (some are Malvern Club and Thames Valley Club sites). From all of these sites you have to track around D123, and Keevil is an obvious problem also to be avoided. If Keevil were to have a larger operational radius then this would cause unpowered flight even more challenges, especially if it were to completely block the airspace between the current Keevil footprint and D123! With an increased operational radius it will also also cause difficulties for pilots flying locally from Westbury, as they would be unable to head out past Bratton village.

We feel your statement below, for Keevil, which states it is 'used extensively' is potentially misleading, and we would appreciate seeing details of actual use. We make a phone request to confirm the status of Keevil on all flyable days on Westbury (for Paragliding and Hang-gliding activity), so have a good idea of the usage statistics and can provide them if required.

12.3 TheKeevilDropZone/Gliding Site is currently marked on aeronautical charts as follows:

'Keevil Aerodrome is used extensively as a military dropping zone and pilots are advised to avoid the aerodrome at all times by 2NM laterally and 2,000ft vertically'

We would like to ask why other airfields have not been considered, or presented as unusable, in the stage 1-2 of the CAP 1616 process. Currently there are 2 airfields already on the SPDA, that would not restrict GA traffic in the Vale of Pewsey. We would welcome a sit down and a discussion in the consultation phase to help all understand who uses the airspace in question.

We feel more research is required to find an ideal solution, and simply making the Area 2.5nm to achieve an overlap to the SPDA, is not one of them. We question the shape of the proposed TRA, whilst understanding the simplicity of a circular region, could not a stub or corridor extending from the existing Keevil airspace to D123 give you what was required without increasing the operational radius (and confusingly re-centering it)? We believe that a significant part of the proposed area will simply not be flown in, or will not in practice be required, but it will cause problems and inconvenience for GA.

We are also very worried by the effect that the TRA will have on GA traffic being forced to route to the west and north of Keevil, and we firmly believe that this could have serious safety implications due to a pinch point for aircraft near the edges of the TRA.

Whilst this is proposed to be a Monday-Friday operation, notified by NOTAM, we assume that any NOTAM will cover the whole working day for operational reasons (such as unplanned return of the aircraft to Keevil). We also worry that in practice the complete M-F window will be blanket covered by NOTAM as standard.

We are greatly concerned about your possible longer-term requirements. If this proposal (or 'similar') was to become permanent, it would severely impact free flying from Westbury (and other 'local' sites), effectively close the areas for GA traffic and cause safety issues for GA.

Yours sincerely,

Secretary - AHGPG Club

On 1 Jul 2020, at 16:49, 47RA-Project-LOVERIDGE (MULTIUSER) < 47RA-Project-LOVERIDGE@mod.gov.uk wrote:

Good afternoon,

Airspace Change Proposal ACP-2020-047

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| Project LOVERIDGE lead | 47th Regiment Royal Artillery | Horne Barracks | LARKHILL | Wiltshire | SP4 8QE | Mil: | Civ: | MOD^{NET} 47RA-Project-LOVERIDGE@mod.gov.uk

<Keevil TDA - Engagement Letter.pdf><Keevil Airfield Temporary Danger Area Proposal - 47 Regt RA.pdf>





Thank your CO for the kind offer of meeting but it is not necessary. My comment is:

I am satisfied that this ACP has accurately identified the hazards of introducing operating in the vicinity of Keevil during the period in question and that the risk has been reduced to be ALARP and tolerable. It will have minimal to no effect on the flying operations of the Army Flying Association.

Best



