

Keevil TDA – Redacted Stakeholder Email Feedback – Second Round

Original Email Sent To All Stakeholders

On Mon, 8 Feb 2021 at 18:09, 47RA-Project-LOVERIDGE (MULTIUSER) <47RA-Project-LOVERIDGE@mod.gov.uk> wrote:

Good afternoon,

UPDATE TO 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 6th May until 4th August 2021.

The proposal was initially intended to commence in August 2020 however as a result of short-notice operational commitments elsewhere was postponed until Spring 2021. This proposal contains previous stakeholder feedback and a revised airspace design from initial consultation that occurred last year.

Your feedback is welcome. This engagement period ends on **Wednesday 3rd March**.

If you have any further questions please do not hesitate to ask.

Kind regards,

[Redacted]

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

RESPONSE EMAILS RECEIVED FROM STAKEHOLDERS

E12

From: [REDACTED]
Sent: 09 February 2021 11:15
To: 47RA-Project-LOVERIDGE (MULTIUSER) <47RA-Project-LOVERIDGE@mod.gov.uk>
Cc: [REDACTED]
Subject: FW: Keevil Airfield Temporary Danger Area Stakeholder Engagement Round 2

[REDACTED]

Good to chat earlier. As there are no changes other than implementation date and the LOA has not changed we have no further points to add.

Good luck!

[REDACTED]
Chief Pilot WAA

From: Hello WAACT <info@wiltshireairambulance.co.uk>
Sent: 09 February 2021 09:18
To: [REDACTED]
Cc: [REDACTED]
Subject: FW: Keevil Airfield Temporary Danger Area Stakeholder Engagement Round 2

[REDACTED]

FYI

[REDACTED]

[REDACTED]

Community Relationship & Volunteer Manager



T [REDACTED]

 *Wiltshire Air Ambulance,* [REDACTED]



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E13

From: [REDACTED]
Sent: 09 February 2021 14:33
To: 47RA-Project-LOVERIDGE (MULTIUSER) <47RA-Project-LOVERIDGE@mod.gov.uk>
Cc: [REDACTED]
Subject: RE: Keevil Airfield Temporary Danger Area Stakeholder Engagement Round 2

[REDACTED]

Many thanks for the update. I did not respond to the initial consultation as I brought it to the Wiltshire Air Ambulances attention as the BHA member most affected by the proposal. I see their wishes/requirements have been taken into account therefore as an association we are content and support the proposal.

Yours

[REDACTED]
CEO BHA

E14

From: [REDACTED]
Sent: 18 February 2021 09:42
To: 47RA-Project-LOVERIDGE (MULTIUSER) <47RA-Project-LOVERIDGE@mod.gov.uk>; 47RA-Project-LOVERIDGE (MULTIUSER) <47RA-Project-LOVERIDGE@mod.gov.uk>
Cc: [REDACTED]
Subject: Keevil TDA Application 2020-047 - Response from the British Gliding Association

Dear Sir/Madam,

Below is our detailed response to the stakeholder round 2 engagement directive (8/2/21-3/3/21) as part of the Keevil TDA proposal 2020-047. I have also included this response as an attachment.
Please acknowledge receiving this email by 5pm Fri 19th Feb 2021.

These views have been collated by the BGA Airspace Committee between 6/2/21 and 18/2/21 and represent the collective views of the whole BGA organisation, its 80 clubs and 7000 pilots in the UK. Our major concerns are:

1. We don't believe it is required at all for the proposed activity as described.
2. We believe the lateral size, vertical extent and times of operation would far exceed what would be required for the anticipated activity
3. The establishment of a TDA is a precursor for a permanent TDA

4. The process for this proposal has not been followed correctly.
5. The central argument of using airspace that is described as already not available is incorrect

The response below also details how the imposition of this airspace would have a very significant negative impact on gliding activity in this area. The area is currently extensively used by glider pilots, mostly radio equipped and particularly in the time period May-August. The BGA has supplied data to substantiate this and is able, if required, to provide any further evidence that may be requested.

Regarding communications associated with this response please contact [REDACTED]
([REDACTED])

Here is our full response:

Attached File:

BGA Response to Proposed Keevil TDA (May-Aug 2021)

These notes are a result of discussion and subsequent peer review throughout the UK gliding network via the BGA Airspace committee. They also take into consideration issues discussed during a video conference with the WK TDA proposer team as part of their engagement responsibilities on Thurs 10th Feb 2021.

A. Fundamental Challenges

1. We challenge the actual requirement for a TDA

a) There are existing ACPs that use EVLOS and the drone operators have permission to use Extended Line of Sight Ops due to the size of the drone. EVLOS does not always **require** a TDA. The size of the EVLOS is negotiated with the CAA on a case by case basis.

(Note - For the "circuit" traffic the following was sent to GAA as a response for ACP-2020-090: *ULTRA UAS has received exemptions from the CAA to fly within a VLOS range of 1.5km from UAS Pilot and 1000 ft AGL. This is due to size and visual conspicuity. Their aircraft is smaller than the Watchkeeper at a span of some 4m <https://www.windracers.org/>*)

b) It would seem that there are many MOD airfields with large multiple runway options well away from popular GA routes that could be used? (Aberporth, West Freugh, Benbecula, Boscombe Down and many more). The WK operators appear to view Keevil as a 'nice to have' rather than a specific critical requirement.

c) The proposed Keevil part of the WK project is purely a launch and recovery operation. The main operation is run from Boscombe/Salisbury plain. If they need to practice launch and recovery under 'austere' conditions this, we believe, could be achieved by adopting alternative operational practices within current DA complexes. Although this may not be ideal it should represent an acceptable compromise against the unreasonable acquisition of such highly valued Class G airspace.

2. The extent of the TDA airspace is vastly out of proportion to the proposed WK activity. The CAA requirement that TDA's should minimise disruption to GA is not achieved by the proposers planning to

use Keevil which exacerbates the airspace bottleneck already existing in this area. This is worsened by proposing to carry out the activity between May and August. The absolute peak of the GA season.

The CAA provides guidance in the document - 20200721 – CAA Policy for the Establishment of Permanent and Temporary Danger Areas (21 July 2020) Policy Statement-Policy for Permanently Established Danger Areas and Temporary Danger Areas...

In para 2.3 it specifies *‘The vertical and lateral dimensions and the operating hours of a notified DA/TDA shall be the minimum practicable necessary to enable the tasks to be undertaken within it, subject to the need to avoid over-complication of airspace structures and any environmental considerations’*. We believe this application fails for the following reasons:

a) The position and size of this proposed TDA at Keevil butting up against the main Salisbury DA’s would force pilots to route via Westbury, Trowbridge and Melksham unless they climb to 3500’ or above - on many days this is not possible due to the cloud base. This WILL have a measurable effect on air traffic density and consequently Mid-Air Collision (MAC) risk. Glider pilots in particular would need to avoid the area as they would not normally be able to guarantee to stay vertically above the TDA - denying them route options for the hundreds of cross-country tasks that would plan to fly through this area during this May-August period.

b) More generally a look at the airspace within 20nm of Keevil clearly indicates the key position this area holds as an already tight funnel of airspace between the Bristol CTA complex and the Salisbury plain DA’s. The BGA has provided the proposer with considerable evidence of actual glider traffic density in this area. We believe the sponsor must provide quantitative analysis of traffic movements around Keevil and in particular the Bristol And Keevil gap. Such analysis must define any MAC risk associated with this ACP. We are very much of the opinion that this would show clearly the serious potential risk to GA safety and the entirely disproportionate use of airspace that a TDA, as proposed, would be.

Although not related to this proposal there is currently another proposer applying for restricted airspace around Lacock (5nm N of Keevil). This exacerbates the importance of the objection to extra airspace restrictions at Keevil.

c) During discussion with the Proposer on 11/2/21 the operators explained that they would routinely need the proposed TDA airspace up to 2500’ for 15mins or so during WK launching in the morning followed by 15mins later in the afternoon for recovery. The requirement for longer periods of TDA use-age outside of these times was only required as a contingency for highly unlikely emergency events. It is our belief that this is completely unreasonable and an inefficient use of highly valued and utilised class G airspace.

Current emergency procedures based upon operations at Keevil include a return to Keevil. It would seem reasonable to consider changing such procedures to using Boscombe Down or another site in the Salisbury plain DA complex as the ‘emergency destination’ in this very unlikely scenario.

3. As there is no defined objective with an end date for this TDA there was a concern that if a TDA is set-up there would be a consequent proposal for a permanent DA. During the discussions on 11/02/21 the proposer confirmed that a permanent application following implementation of this temporary application was being considered. Therefore, we believe a robust objection to this proposal is appropriate. Any mitigation that disruption may be short-lived is not therefore valid.

4. The required process to establish a TDA Application has NOT been followed.

a) The CAA CAP1616 Temporary Airspace Change (Para 300) requirements specify as follows:

If technically feasible, the consultation duration should be the usual 12 weeks. In addition, the CAA will require the change sponsor to provide information to the full range of stakeholders on what change is taking place and why, and also on the likely impacts while it is in operation.

Unfortunately, although this may have been the intention from 1/7/20 this process was abruptly stopped and despite attempts to engage no communication was possible after 31/7/20 – far short of the 12 weeks required. This was explained by WK Operations in February 2021 and they admitted consultation was stopped due to operational commitments. We believe a full and comprehensive 12-week consultation period from February 2021 is now required to comply with this regulation. The proposal dictates that following the 4-week consultation period in July 2020 a further 3-week period was agreed with the CAA. This appears to be in contravention of this regulation as there is no evidence that such a process is not ‘technically feasible’.

b) We believe that due to the potential size of the TDA and its position creating a critical airspace bottleneck (see 2 above) there is a case that this TDA **does not** comply with the regulation stating that :

This guidance is limited to creation of a TDA which does not have the potential to alter traffic patterns below 7,000 ft over inhabited areas. (20200721 – CAA Policy for the Establishment of Permanent and Temporary Danger Areas (21 July 2020) Policy Statement-Policy for Permanently Established Danger Areas and Temporary Danger Areas -Apx A)

It is our contention that implementation of this TDA would necessitate significant extra traffic having to fly over the built-up areas of Westbury, Trowbridge and Melksham (home to approx. 80,000 residents)

c) The gliding operation which uses Keevil itself – Bannerdown GC, had NOT been consulted directly during the Feb 2021 process at the time of our meeting with the Loveridge team on 11th Feb. This TDA would have a significant impact on their operations. Although the club operates predominantly at weekends the club IS active on regular weekdays and evenings throughout the summer season.

5. The proposers understanding of the current airspace status suggests that the 2nm / 2000’ around Keevil is already restricted airspace. It is not. It is advisory.

Whilst good airmanship dictates that pilots would plan to routinely avoid this area, there is currently no reason not to use this airspace if the pilot can satisfy him/herself that there is no danger by so doing. There are many other examples of such airspace in the UK. So, the implication that this TDA just adds a small extra portion to that 2nm/2000’ airspace is fundamentally wrong. This TDA is extra airspace that would prohibit access by default.

(Obviously if the Keevil Drop Zone is notified as active for parachuting activities a different approach is taken by pilots).

B. Potential Mitigations

Despite the significant challenges detailed above we believe that in the spirit of trying to work with other airspace users there are some mitigations that could affect our views on this proposed TDA. During the video conference held on 10.2.21 most of the discussion was of a constructive nature to see if there was a different framework that could satisfy all parties

Notwithstanding the fundamental points detailed above, the size and operations of the TDA may be acceptable with the following mitigations:

a) The **TDA was redesigned**. The Northwestern (**all airspace NW of the 24/06 runway**) **part of the TDA was restricted to 1000' AGL** to allow circuit operations for WK. **The Southeastern section could be restricted to 3000' QNH** - plenty of height to allow for climb/descent in the very short (2nm) section from the TDA to D123. This would seem to be completely adequate for the proposed operations as described.

b) TDA transits could be accessed **directly via the Keevil A/G operations frequency** and a commitment that this frequency will always be manned during the WK hours of operations. The proposal to use Boscombe is operationally inadequate. A crossing request would need to be made via Boscombe, who are already a busy unit. This request would then need to be coordinated with Keevil and the subsequent result reported back to the pilot. This, in our opinion, based on similar processes elsewhere, is unlikely to be efficient enough for cross-country soaring pilots to use.

The use of a visual signalling device/system to indicate activity in progress (lights/markers) was also discussed at the video conference. If these could be used safely and effectively all parties considered these may help to provide a solution.

The proposed (by WK Ops) use of the frequency used on the airfield currently (129.980) for coordinating transit requests was discussed. This frequency is in fact 'given' to the gliding fraternity for local airfield operations. There were thought to be pros and cons to using this frequency and WK agreed to investigate the possibility of an alternative frequency as well.

c) A commitment to **activate/deactivate with an agreed communications process (website? Telephone information line?) to ensure all potential users of the airspace can get prompt information on the current status of the airspace. On a regular basis there should be an agreement to promulgate by 8.30am each day the actual likely times of WK flying.**

For example:

'Active today 1000-1230 for launch then 1430-1600 for recovery' (Note - It may be acceptable for there to be a requirement for transiting pilots to monitor the Keevil A/G frequency between 1230 and 1430 in case of unexpected developments).

Considerable discussion about this took place at the 10th February meeting. WK Ops agreed they may be able to progress this (or something similar) mitigation proposal.

Refs

- CAP1616 Para 295-306 (Temp Changes)
- 20200721 – CAA Policy for the Establishment of Permanent and Temporary Danger Areas (21 July 2020) Policy Statement-Policy for Permanently Established Danger Areas and Temporary Danger Areas

BGA Airspace Committee 18.2.21

End of Attached File

E15

From: [REDACTED]

Sent: 01 March 2021 10:00

To: 47RA-Project-LOVERIDGE (MULTIUSER) <47RA-Project-LOVERIDGE@mod.gov.uk>
Subject: Response to Project Loveridge ACP-2020-047 Feb 2021

Dear Sirs

Please find the attached response from the Bath Wilts and North Dorset Gliding Club.

Please would you acknowledge receipt of this input.

[REDACTED]
Airspace representative
Bath Wilts and North Dorset Gliding Club.

Attached File:

Response to the Feb 2021 Project Loveridge TDA consultation from
The Bath Wilts and North Dorset Gliding Club

This is not a single response from an individual but represents the views of an aviation community, and should be treated as such.

This response represents the interests and views of the Bath Wilts and North Dorset Gliding Club. The Club operates from an airfield known locally as The Park. It is located approx. 12 miles south of Keevil airfield and has a membership of approx. 120. Club members frequently fly cross-country routes passing close to Keevil airfield, including the area between the airfield and the Salisbury Plain danger area. The club has operated in the area for over 50 years, so has long-established operating routes and procedures.

We fully support the response submitted by our parent body, the British Gliding Association. (BGA). It represents the views of the many Glider pilots who use the affected airspace at and around Keevil, of which our club is but one.

With regard to the specific proposal we wish to state the following....

1. Any restriction on our ability to fly in the vicinity of Keevil is unwelcome to us, as it would limit our ability to fly cross-country glider flights successfully. As frequent users of this Class G airspace we would be disadvantaged by any reduction in the access to it, either temporarily during the proposed trial period or in any permanently changed airspace structure.

2. The timing of the proposed trial could not possibly be worse for our club. It was originally planned for the winter months and this would have had limited impact on us, as very little cross-country flying takes place in the winter. In its proposed form it would reduce safety margins for our pilots and negate flight options that we use frequently.

3. As part of its wider activities the Club trains and teaches glider pilots. To this end it operates a long-established routing for early cross-country qualifying flights. This routing includes Keevil as a land-out option on the route between The Park and the Rivar Hill gliding site near Hungerford. During any TDA activity at Keevil that land-out option and its routing would be made either unusable or significantly more challenging for low-hours pilots. The TDA would give rise to complication and additional route miles over populated areas. The proposed mitigation of a DACS is not particularly helpful to low hours pilots owing to workload and familiarity with radio procedures. Should such a DACS be provided it would need to be easily usable by inexperienced pilots, and preferably augmented by an unambiguous visual ground signal such as a flashing beacon.

4. We would expect that the proposed volume of airspace would be kept to an absolute minimum in order to permit overflights and close transits of Keevil airfield by gliders and GA aircraft without unwarranted restriction. In particular we continue to question the northerly extent of the proposed TDA, even as modified and proposed in the Feb 2021 consultation document. Whilst we profess no detailed knowledge of how the Watchkeeper drone needs to be operated we would expect that full consideration should be given to the needs and pre-existing freedoms of other aircraft when designing any scheme for its operation at Keevil. Despite assurances to the contrary from Loveridge team members we remain to be convinced that all of the proposed airspace is needed. We also remain to be convinced that the three airfields on Salisbury Plain should be excluded to the extent that they are.

5. We would expect that any planned use of Keevil airfield as a TDA should be for the minimum duration possible, and notified by NOTAM on a per-occasion basis with real time website or phone updates for flight planning purposes.

6. We refer you to the information that we sent to the project team on 13th Oct 2020 providing background information about the ways glider pilots have been using this airspace for many years. This included heat maps showing a typically large number of glider over flights of Keevil airfield during 2019. It was provided to enhance an understanding of how the airspace is used by glider pilots.

7. Under the CAP1616 process we would expect all possible mitigations to be included in your proposals to minimise disruption to our use of the airspace.

Please would you keep the undersigned personally advised of developments with this proposal as the person representing the Club's interests in local airspace matters.

Bath Wilts and North Dorset Gliding Club. (A BGA affiliated Club.)
The Airfield

A large black rectangular redaction box covering the signature and name of the undersigned.

[REDACTED]

End of Attached File

E16

From: [REDACTED]
Sent: 10 February 2021 16:07
To: 47RA-Project-LOVERIDGE (MULTIUSER) <47RA-Project-LOVERIDGE@mod.gov.uk>
Subject: Re: Keevil Airfield Temporary Danger Area Stakeholder Engagement Round 2

Dear [REDACTED]

Many thanks for the update. Per our previous input, The Friends of Steeple Ashton are very pleased to see Keevil Airfield utilised by all elements of the Armed Forces, and we look forward to seeing Watchkeeper in operation from May 2021.

Our best wishes to all at 47th Regiment.

[REDACTED]
Chair, Friends of Steeple Ashton

E17

From: [REDACTED]
Sent: 14 February 2021 22:16
To: 47RA-Project-LOVERIDGE (MULTIUSER) <47RA-Project-LOVERIDGE@mod.gov.uk>
Subject: Re: Keevil Airfield Temporary Danger Area Stakeholder Engagement

[REDACTED]

Thank you for your courtesy call re possible changes to Keevil zone.
Perhaps you could help me with another matter?

I need contact details, address or email, of military air controlling authority as I find regular very low and very close flybys of my hangar without any higher safety preliminary overflight to be imprudent or dangerous when I am operating.

Thank you.
Yours

[REDACTED]