

**MINUTES OF THE KEEVIL PERMANENT AIRSPACE CHANGE PROPOSAL ASSESSMENT MEETING
HELD VIRTUALLY OVER TEAMS ON 16 SEP 2021**

16 Sep 2021

CAA
Watchkeeper Force

Present	Appointment	Representing
[REDACTED]	Chairman, Project Officer and Airspace Regulator (Technical)	CAA
[REDACTED]	Airspace Regulator (Environment)	CAA
[REDACTED]	Airspace Regulator (Engagement and Consultation)	CAA
[REDACTED]	Airspace Regulator (Economist)	CAA
[REDACTED]	Principal Airspace Regulator	CAA
[REDACTED]	Airspace Regulator (Utilisation)	CAA
[REDACTED]	Principal Airspace Regulator	CAA
[REDACTED]	SO2 Airspace Plans	DAATM
[REDACTED]	Regimental Second in Command	47 Regt RA
[REDACTED]	Watchkeeper Senior Operator	Watchkeeper Force
[REDACTED]	Operations Officer (Sponsor)	47 Regt RA
[REDACTED]	Operations Warrant Officer	47 Regt RA

CAA Assessment Meeting Opening Statement

The CAA has received a Statement of Need and presentation in advance of the Assessment Meeting and confirmed that the documents must be published by the sponsor, together with minutes of the meeting, on the Airspace Change Portal page.

It must be noted that this is an Assessment Meeting and not a Gateway. The Change Sponsor is required to provide a broad description of their proposed approach to meeting the CAA’s CAP 1616 requirements, however the CAA will not at this stage decide whether it meets the detailed requirements of the CAA’s process.

The purpose of the Assessment Meeting as set out in CAP 1616 is 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 formal airspace change process, and to enable the CAA to consider the appropriate provisional Level to assign to the change proposal.

Additionally, the sponsor is required to provide information on how it intends to fulfil the requirements of the airspace change process and its provisional timescales.

Lastly, the sponsor is required to provide information on how it intends to meet the engagement requirements of the various stages of the airspace change process.

		ACTION
Item 1 – Introduction		
1.	The Chairman opened the meeting and the participants introduced themselves.	
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.	
3.	The Chairman reminded the Sponsor that the Meeting Agenda is required to be uploaded to the ACP Portal after the meeting.	Sponsor

<p>Item 2 – Statement of Need</p> <p>4. The Sponsor presented the Statement of Need (SoN) to the participants, explaining that in order to comply with current regulation and operate the Watchkeeper (WK) Remotely Piloted Air System (RPAS) Beyond Visual Line of Sight (BVLOS) from Keevil Airfield, segregated airspace is required.</p> <p>5. The Chairman noted that the SoN differs from that of the uploaded DAP1916, requested clarification from the Sponsor and for the Sponsor to submit a new DAP1916 to reflect the new SoN as Version 2.</p> <p>6. The Sponsor explained that the new SoN is largely similar to the previous and has been updated to be more specific in order to highlight what the Sponsor need to achieve with the Airspace. The Sponsor confirmed he will replace the SoN through submitting a new DAP1916 and upload it to the Portal as SoN Version 2.</p> <p>7. The Chairman requested that the Sponsor clarifies within the SoN what Regulations (in general) requires the operations under Segregated Airspace and suggested that the SoN may benefit from stipulating that due to not having a Detect and Avoid capability, Segregated Airspace is required.</p> <p>8. The Sponsor displayed the ENR 5.5 and Military Aeronautical Chart for Keevil Airfield to add context and familiarise participants more with the area concerned.</p> <p>9. The Chairman noted that the civil charts reflect slightly different information to that of the military charts and that it should be noted during the Stakeholder Engagement.</p>	<p>Sponsor</p> <p>Sponsor and DAATM</p>
<p>Item 3 – Issues or opportunities arising from proposed change</p> <p>10. The sponsor discussed 2 issues:</p> <ol style="list-style-type: none"> a. Timeline to proposed Implementation b. Integration with other stakeholders. <p>11. The Sponsor explained that the opportunity arising out of the proposed timeline is the ability to continue develop Military RPAS operations which can be best achieved from Keevil.</p>	
<p>Item 4 – Options to exploit opportunities or address issues identified</p> <p>12. The Sponsor raised the following proposals to address the issues previously identified.</p> <p>Timeline to Proposed Implementation:</p> <ol style="list-style-type: none"> a. Utilising lessons learned and previous work conducted on the TDA b. Building on the established relationships with existing stakeholders, started during the TDA. <p>Integration with other stakeholders:</p> <ol style="list-style-type: none"> a. Development of tested operating procedures to further reduce impact. b. Only using airspace for short periods of time. Only activating the airspace when required. <p>13. The Sponsor discussed the exploitation opportunities identified above.</p> <p>Continued development of Military RPAS Operations:</p> <ol style="list-style-type: none"> a. Area will provide a test-bed for further development of BVLOS RPAS operations in UK Airspace 	

<p>b. Allow the use of airspace already designated for BVLOS RPAS Operations (EG D123, D125 and D126)</p> <p>14. The Principal Airspace Regulator enquired from the Sponsor if the “test-bed” for BVLOS RPAS Operations refer to both Military and Civilian RPAS.</p> <p>15. The Sponsor stated that for the moment their intent is solely military, but that this airspace may facilitate civilian companies operating into Salisbury Plain Training Area in support of Defence in the future.</p> <p>16. The WK Senior Operator agreed that their intention to operate from Keevil is solely to develop Military RPAS Operations and support the military.</p> <p>17. The Chairman noted that the use of the airspace by other users may be of a concern to some Stakeholders and that although WK only intends to use it a certain way, other agencies operating BVLOS may also in the future (should a change request be successful) use the airspace; This must be taken into account during consultation.</p> <p>18. The Chairman noted that although the Sponsor have done previous work on the TDA which the Sponsor benefit from, this Change Request is completely separate from the TDA and the Sponsor must therefore be open to different options during the option development. The eventual choice in airspace structure requested must be concluded on its own merits and not due to the previous utilisation of the TDA.</p>	
<p>Item 5 – Provisional indication of the scale level and process requirements*</p> <p>19. The Chairman requested if the Sponsor anticipated any considerations of CAP1618 to achieve their proposed operations.</p> <p>20. The Sponsor did not consider CAP 1618 within initial scope to achieve BVLOS RPAS Operations.</p> <p>21. The DAATM confirmed that CAP 1618 may only become a consideration during the Options development, should the detail in the En Route section be able to be removed and integrated to allow BVLOS RPAS Operations.</p> <p>22. The Chairman agreed that the SoN is in scope for CAP 1616. It is therefore assigned a provisional Level M1 due to the anticipated consequence of alteration of civil air traffic patterns below 7000 feet over inhabited areas.</p> <p><i>* When the sponsor submits their gateway materials for each Gateway at the agreed submission deadline, the period between this and the gateway decision will be an analysis by the CAA Airspace Regulatory team (Airspace Regulation) of the documentation submitted, for the purposes of making a recommendation to the CAA Gateway decision maker(s). In conducting the gateway assessment, the CAA is assessing the process employed and its compliance with the guidance stipulated within CAP1616. It is not an assessment of the merits of the submission itself, which is reviewed at Stage 5 - Decision. We may request documentation from the sponsor that is referred to in the gateway submission but has not been provided as part of the Gateway submission materials. We may also request the sponsor to provide information by way of clarification relating to statements or assumptions made in the submission. Any further information sought by Airspace Regulation at this stage is for clarificatory purposes and is only for determining compliance with the CAP 1616 process.</i></p> <p><i>In any instance where a sponsor has not met the requirements of the process, we will inform them after the gateway decision and advise of next steps.</i></p>	

<p>Item 6 – Provisional process timescales*</p> <p>23. The sponsor discussed 2 optional timelines with the main difference being a shortened Define Stage. The Define Stage 1B is proposed to be reduced using existing established relationships, previously prepared work and focus groups to accelerate the Design Principles drafting. The consultation phase has not been shortened.</p> <p>24. The Ops Warrant Officer (OpsWO) enquired from the CAA if they will have a Gateway on the last Friday of Dec, as this is one of their proposed Gateways in Option 1 of the Timeline.</p> <p>25. Airspace Regulator (Engagement and Consultation) reminded the Sponsor that the stakeholders expected to be engaged with on a Permanent ACP is not limited to aviation stakeholders only compared to that of a TDA.</p> <p>26. The Sponsor confirmed that along with the NATMAC, SAR and aviation Stakeholders, that National organisations and local communities were already included during the TDA engagement and they intent to build on this to ensure a comprehensive Stakeholder list.</p> <p>27. Principal Airspace Regulator confirmed that the Dec Gateway is on Fri 17 Dec.</p> <p>28. The Sponsor enquired with the CAA if the Timelines would be acceptable.</p> <p>29. The Chairman stated that a formal review of the Timeline by the CAA is required to ensure that the CAA has resources to assign during key period to achieve the Timeline. The Timeline is also subject to external influences; Should the Sponsor needs more time for example or should the Secretary of State for Transport decides that the CAA needs to alter their priorities, a new proposed Timeline must be agreed and posted onto the Portal.</p> <p>30. The Chairman requested an email after the meeting, the proposed Timeline for the CAA to consider and approve.</p> <p>31. DAATM requested confirmation if justifications for shortened Stages are required.</p> <p>32. The Chairman confirmed proposed shortened Stages that impact the Sponsor workload only does not need to be approved by the CAA but is likely to require explanation in the submission documents. Where the Sponsor proposes to scale any of the process requirements, e.g. any shortened Consultation period or Stages that are conducted internally by the CAA, requires a justification to be considered and approved by the CAA.</p> <p>33. The Sponsor enquired about the feasibility to request a shortened Decide and Implement Gateway for this type of ACP.</p> <p>34. The Chairman explained that its possible but must be justified. He also stated that it's too early to consider at this stage and the option remains open to request it later.</p> <p>35. The Chairman reminded that the CAA must normally have made their decision prior to the Sponsor being able to submit their request to AIS for the Airspace change to be auctioned. Submission to AIS in anticipation of a successful application to the CAA is not allowed.</p> <p>* The timeline agreed may become subject to change by the CAA. This is because the Secretary of State for Transport has directed the CAA to prioritise RNP Instrument Approach Procedures (IAPs) without an Approach Control proposals; this may impact Airspace Regulation resource and consequently timelines.</p>	<p>Sponsor</p> <p>Sponsor</p>
<p>Item 7 – Next steps</p> <p>36. The Chairman requested that the Draft Minutes be sent within one week from the meeting to allow time for the CAA and Sponsor to agree them prior to being uploaded to the Portal.</p>	<p>OpsWO</p>

<p>Item 8 – Any other business</p> <p>37. The Chairman reminded the Sponsor to consider what types of structures are available other than that already used (TDA / DA) and that some of them may not require an airspace change. The CAA expects to see different options being considered and discounted with relevant reasoning. The Chairman agreed to send the Sponsor a link to Section 70 of the Transport Act that the CAA considers when assessing ACPs and highlights other considerations from legal perspectives.</p> <p>38. The Chairman highlighted that there is an element of proportionality available to the Sponsor; if a specific requirement is not proportionate, voice this in the ACP documentation. Although not required to conduct a noise and environmental impact assessment of military operations, since this ACP may impact civil air traffic the Sponsor must include a proportionate study of the anticipated environmental impacts of the consequential changes on civil aviation patterns.</p> <p>39. Airspace Regulator (Environment) confirmed that depending on where these impacts occur there is a requirement to assess the indirect (consequential) impact on other aircraft, causing a variation in:</p> <ol style="list-style-type: none"> a. Noise (changes below 7,000ft and over an inhibited area) b. Air quality (changes below 1,000ft and within an AQMA) c. Tranquillity (changes below 7,000ft and over an AONB, National Park or Quiet Area) d. Fuel burn and Carbon Dioxide e. Biodiversity (where necessary e.g. noise impact on protected habitat) <p>40. Airspace Regulator (Environment) continued that if the Sponsor provided robust rationale that assessing the impact (as above) does not provide an assessable result, the CAA will determine if that specific impact assessment can be scoped out. For example, the sponsor determines that the consequential impact would not lead to noise levels in excess of the 51 dB LAeq Lowest Observed Adverse Effect Level (LOAEL).</p> <p>41. Airspace Regulator (Economist) stated that the options appraisal is an iterative process that develops into three stages. In Stage 2 the sponsor develops a comprehensive list of options that addresses the Statement of Need and aligns with the Design Principles identified in Stage 1. At this stage the CAA expects to receive a qualitative assessment of the options where the Sponsor assesses the consequential impact on other airspace users. In Stage 3 and 4, any impacts that have been identified need to be quantified and included in the assessment following CAP1616, Appendix E - Table E2 and E4. For better guidance on how to develop the options the Sponsor can use Appendix E of CAP 1616. If the Sponsor believes that Commercial Aviation is not impacted by the proposed airspace change, this has to be justified and explained why this is not assessed.</p> <p>42. Airspace Regulator (Engagement and Consultation) reminded the Sponsor that this is a separate ACP to that of the TDA and this must be explained to the Stakeholders. The Stakeholder engagement at Stage 1 and 2 is expected to be at a representative level (Para 121 of CAP 1616), whereas consultation is aimed at a wider audience. Appendix D sets out more detail and guidance on Design Principles development and engagement at Stage 1 and lists the expected outputs. At Stage 2, the two-way engagement is expected with the same set of Stakeholders as Stage 1. For both stages' engagement records/evidence must be maintained in order to assess the validity of the engagement activities.</p> <p>43. At Stage 3 the Sponsor is required to produce a Consultation Strategy. Should the Sponsor believe that a fair, transparent and effective consultation can be achieved within a period of time that is less than the recognised 12-week standard, then they must present their rationale in the Consultation Strategy for the CAA's assessment at the CONSULT Gateway. Consultation must be conducted through Citizen Space. Appendix C provides further information on consultation principles and expectations.</p> <p>44. The Chairman offered to the Sponsor the availability of the CAA participants to assist in providing advice and guidance throughout the process.</p>	<p>Chairman</p>
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45. The Sponsor thanks the participants for their time and assistance and agreed to the action points previously discussed.	
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46. The Chairman concluded the meeting.	
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ACTIONS ARISING FROM [ACP-2021-006] ASSESSMENT MEETING

Subject	Name	Action	Deadline
Statement of Need	Sponsor	Clarification of terminology within Statement of Need and submission of new DAP1916	24 Sep 21
Timeline	Sponsor	Submission of proposed timeline to CAA	24 Sep 21
Draft Minutes	Sponsor	Submission of draft minutes to CAA	24 Sep 21

**Ministry of Defence
ACP Sponsor**