

**ACP-2021-006**

**ENABLING BVLOS RPAS OPERATIONS FROM KEEVIL  
AIRFIELD, WILTSHIRE**

**GATEWAY DOCUMENTATION:**

**STAGE 1 - DEFINE**

**STEP 1B - DESIGN PRINCIPLES  
AND STAKEHOLDER ENGAGEMENT**



Ministry  
of Defence

## Responsible Authors of this Document

The Sponsor for this Airspace Change Proposal is the Ministry of Defence and will be managed under Project LOVERIDGE. The project team is drawn from Joint Helicopter Command, specifically the Watchkeeper Force and 47<sup>th</sup> Regiment Royal Artillery.

Only responsible authors may implement amendment via the Project LOVERIDGE lead. All revisions will be listed and detailed in the table below.

<b>Revision Number</b>	<b>Affected Part</b>	<b>Revised By</b>	<b>Notes</b>
Initial Issue 1.0		Project LOVERIDGE lead	

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## Introduction

The Ministry of Defence, specifically the Watchkeeper Force on behalf of Joint Helicopter Command, is the Change Sponsor for this ACP. The aim of the proposal is to facilitate Beyond Visual Line of Sight (BVLOS) flying of the Watchkeeper Remotely Piloted Air System (RPAS) from Keevil Airfield, Wiltshire in order to operate within the extant Danger Area complex over Salisbury Plain Training Area (EG D123, D125, D126, D128 specifically).

The aim of this document is to provide evidence to the CAA that the Change Sponsor has adhered to the process laid out in CAP 1616 for Stage 1 of the ACP<sup>1</sup> and forms part of the overall submission for the Stage 1 Gateway.

The Sponsor has engaged with a wide variety of potential stakeholders and sought their feedback on the initial Design Principles that will then frame the Design Options during Stage 2. The feedback received has been reviewed and summarised in this document in order to finalise the proposed Design Principles.

This document is laid out in the following way:

**Section 1 – Stakeholder Engagement.** This section outlines how stakeholders were identified, the engagement methodology and a timeline.

**Section 2 – Design Principles development.** This section describes the initial draft Design Principles, summarises feedback and then proposes a final set of Design Principles.

**Stage 3 – Next steps.** Outline of the next steps in the ACP process, including adherence to the timeline agreed at Stage 1A.

**Annex A – Stakeholder Feedback Analysis.** This will highlight the rationale for accepting or rejecting feedback from stakeholders and includes additional feedback received at this stage.

**Annex B – Raw Stakeholder Feedback.** All stakeholder feedback that was received by the Sponsor.

## Executive Summary

Having identified potential stakeholders the Sponsor grouped them into the following categories:

National Air Traffic Management Advisory Committee members

Local aviation stakeholders

Local area stakeholders

Internal Ministry of Defence stakeholders<sup>2</sup>

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<sup>1</sup> Specifically, Annex D to CAP 1616

<sup>2</sup> via Defence Airspace and Air Traffic Management (DAATM)

Engagement began on 22<sup>nd</sup> October 2021. The majority of engagement was conducted in writing and the Sponsor received 16 responses via email. The Sponsor also conducted in-person engagement with over 30 local stakeholders as part of the Salisbury Plain Training Area Air Users Working Group.

There was a relatively low response rate at this stage and some feedback was deemed to fall outside of the specific feedback on Design Principles. The overarching theme from general aviation stakeholders was concerns over the removal of valuable Class G airspace in the area and the restrictions that may be placed on them that would limit their freedom of manoeuvre around the North West of Salisbury Plain.

Whilst largely supportive, feedback from some local stakeholders requested greater representation of their interests and suggested the inclusion of a principle relating to noise abatement.

As a result of the engagement, two Design Principle were modified, and a further Design Principle has been added. The draft principles have also been categorised in priority order however there was limited feedback specifically relating to priorities.

## Section 1

### Identification of potential Stakeholders

**Local Stakeholders.** Initial research was conducted to identify stakeholders within the local aviation and local area stakeholder categories. Previous stakeholders from ACP-2020-047<sup>3</sup>, both from an air user and ground perspective, were considered as this ACP relates to the same geographical area.

Whilst the RPAS operating area between Keevil and Salisbury Plain is relatively concentrated it is recognised that the proposed ACP has the potential to affect wider air users from across the region. For this reason, the MOD expanded its catchment area to an area of approximately 30 NM from Keevil itself. Stakeholders were identified through scrutiny of aeronautical charts who were then contacted directly. Local authority engagement was carried out at both a County and a Parish level. This was primarily due to the location of the airfield being adjacent to several Parishes and that relationships were already established after the previous Temporary Danger Area engagement.

At this stage it was decided not to engage directly with Members of Parliament.

**National Stakeholders.** NATMAC stakeholders were identified and can be found in the table later in this chapter. There was an assumption that NATMAC organisations, as national over-arching bodies, would cascade information to representatives at an appropriate level as they saw fit, and this was requested in the written communication. This may have resulted in some stakeholders being contacted twice but reduced the likelihood of the Sponsor not engaging with relevant stakeholders that it may otherwise have inadvertently omitted.

**MOD Stakeholders.** MOD stakeholders were identified by Defence Airspace and Air Traffic Management through the Military Airspace Users Working Group (MAUWG) contact list

As a result of the research above the following stakeholders were identified:

Local Area Stakeholders		
Coulston Parish Council	Friends of Steeple Ashton	Steeple Ashton Parish Council
Erlestoke Parish Council	Keevil Parish Council	Wiltshire County Council

Local Aviation Stakeholders		
Avon Hang Gliding and Paragliding Club	Craysmarsh Farm Airfield	Oaksey Park Airfield
Bath Wilts & North Dorset Gliding Club	Devizes (Coate) Airfield	Rivar Hill Gliding Site (Shalbourne Gliding)
Bowerchalke Airfield	Devizes (Urchfont) Airfield	Wadswick Airfield
Bristol & Gloucestershire Gliding Club / Nympsfield Airfield	Dorset and Somerset Air Ambulance	Wessex Model Flying Club

<sup>3</sup> MOD Temporary Danger Area to operate BVLOS RPAS in Spring/ Summer 2021.

Bristol Airport	Draycot Aerodrome, Swindon	Western Air Thruyton / Vantage Aviation
Brown Shutters Farm Airfield	Garston Farm Airfield, Chippenham	White Ox Mead Airfield
Charlton Park Airfield	HeliAir Thruyton	Wiltshire Air Ambulance
Clench Common Microlight Site	Henstridge Airfield	Wing Farm Microlight Site
Compton Abbas Airfield	Lydeaway Field, Devizes	Yatesbury Microlight Site
Cotswold Airport (Kemble)	Manor Farm Airfield, Pewsey	
Cotswold Gliding Club / Aston Down Airfield	Membury Airfield	

<b>NATMAC Stakeholders</b>		
Aircraft Owners and Pilots Association (AOPA)	British Gliding Association (BGA)	General Aviation Alliance (GAA)
Airspace Change Organising Group (ACOG)	British Gliding Association National Airspace Committee	Helicopter Club of Great Britain (HCGB)
Airspace4All	British Hang Gliding and Paragliding Association (BHPA)	Light Aircraft Association (LAA)
Association of Remotely Piloted Air Systems (ARPAS-UK)	British Helicopter Association (BHA)	National Air Traffic Service (NATS)
Aviation Environment Federation (AEF)	British Microlight Aircraft Association (BMAA) / General Aviation Safety Council (GASCo)	National Police Air Service (NPAS)
British Airline Pilot Association (BALPA)	British Model Flying Association (BMFA)	PPL/IR (Europe)
British Balloon and Airship Club	British Skydiving	UK Airprox Board (UKAB)
British Business and General Aviation Association (BBGA)	Drone Major	UK Flight Safety Committee (UKFSC)

<b>MOD Stakeholders (*via DAATM)</b>		
2 Group DAAM*	HQ 1 Group*	MOD Boscombe Down*
Army Aviation Centre, Middle Wallop*	HQ 2 Group*	RAF Brize Norton*
Army Flying Association, Middle Wallop	HQ 22 Group*	RNAS Yeovilton*
Army Gliding Club, Wyvern	Joint Helicopter Command (JHC)*	Salisbury Plain Air Operations*
Bannerdown Gliding Club	Military Airspace Management Cell*	USAF Europe*
Defence Airspace and Air Traffic Management (DAATM)	Military Aviation Authority (MAA)	

Additionally, one further local aviation stakeholder and several local residents contacted the Sponsor directly having been passed the Engagement Letter. They will be added to the list of future Stakeholders.

## Method of Stakeholder Engagement

**Written Communication.** The primary method of engagement at this stage was written communication via email. An attached letter introduced the ACP, outlined the draft Design Principles and provided details on how to provide feedback. A copy of the engagement letter will be submitted as part of this Gateway documentation and can also be found at Annex B.

**Verbal Presentation to SPTA AUWG.** The Sponsor was given the opportunity to deliver a face-to-face brief at the Salisbury Plain Training Area Air User Working Group<sup>4</sup> on 27<sup>th</sup> October. This provided an opportunity to directly brief stakeholders, both civilian and military, who operate aircraft (gliders, helicopters, hang-gliders and fixed wing light aircraft) and have an interest in the local airspace.

### Methods discounted at this stage

**Wider verbal briefs.** Whilst it remains the intent for the MOD to conduct face-to-face briefs at a later stage, it was felt that they would be of little value during this engagement period. It is anticipated that such briefs would be more beneficial during Stage 2 and 3 of the ACP. Targeted face-to-face engagement occurred during the SPTA Air User Working Group as described above.

**Surveys.** Surveys were considered however at this stage of the ACP it was felt that direct written communication would provide more effective engagement feedback to shape Design Principles. Surveys will be considered during later engagement and consultation.

### Engagement Chronology

Date	Action	Remarks
Sep 21	Sponsor email address published on Airspace Change Portal along with Stage 1A documentation	
22 Oct 21	Engagement letter sent to local area stakeholders	3 responses from 7
22 Oct 21	Engagement letter sent to local aviation stakeholders	4 responses from 32
22 Oct 21	Engagement letter sent to NATMAC stakeholders	3 responses from 24
22 Oct 21	Engagement letter sent to MOD stakeholders	6 responses from 17
27 Oct 21	Presentation at the Salisbury Plain Training Area Air User Working Group	Face-to-face brief attended by over 40 local military and civilian air users
19 Nov 21	Engagement period finished	

<sup>4</sup> Hosted by Salisbury Plain Air Operations at Westdown Camp, Wiltshire



## Section 2

### Original Draft Design Principles

The Draft Design Principles that were initially presented were as follows:

Draft Design Principle		Rationale
<b>A</b>	Provide a safe environment for all airspace users.	The airfield is located within Class G airspace which currently BVLOS RPAS are not permitted to fly in without adequate segregation in order to provide a known, safe environment for all air users.
<b>B</b>	Provide sufficient airspace to meet all technical requirements for the Watchkeeper RPAS platform.	During normal operations the Watchkeeper RPAS performs in a similar manner to that of crewed aircraft. To add redundancy and mitigate against the risks resulting from certain system failures, the aircraft is programmed to perform in a specific and known manner that allows the aircraft to recover safely to the airfield should it be required. During these recoveries the flight path of the aircraft differs from that of its normal departure and recovery routes. The airspace structure must consider the different operating requirements to maintain safe operations to all users and local residents.
<b>C</b>	Minimise the impact to other airspace users, both in terms of activation and volume of airspace required.	Based on previous experience of operating from Keevil it is clear that there are opportunities to minimise the potential impact of RPAS operations.
<b>D</b>	Endeavour to make the airspace as accessible as possible to all types of air user.	Although freedom of access must be measured against the risk to safe operations, users must not unreasonably be denied access to the resulting airspace structure.
<b>E</b>	Use standard airspace structure where possible (conformity, simplicity and safety).	Design Options should aim to be simple and provide unambiguous rules in order to ensure it meets the intent of Design Principle A.

### Engagement Feedback

A lot of feedback received did not directly relate to the Draft Design Principles. These responses were still analysed and can be found in Annex A.

Feedback on the Design Principles were arranged under each DP and a rationale provided for either accepting a new DP, modifying an existing one or rejecting the feedback. Additionally, the Sponsor did not receive any feedback on the priority order of the draft principles.

**DP (A). Provide a safe environment for all airspace users.**

The requirement for a safe operating environment as a Design Principle was not contested during the Stage 1 Engagement period and only limited feedback was received.

A request from a local resident to include “*personnel on the ground as well as local residents*” into Design Principle A was considered. However, the risk to ground personnel is already mitigated through operating procedures such as minimising direct overflight over built up areas and not directly as a result of airspace design.

Outcome: DP (A) remains unchanged and it is deemed to be the most important Design Principle.

**DP (B). Provide sufficient airspace to meet all technical requirements for the Watchkeeper RPAS platform.**

A Stakeholder raised a concern that the phrase “*meet all technical requirements*” will increase the size and complexity of the airspace in order to cater for **all** possible eventualities regardless of how low the probability is of them occurring.

Whilst the Sponsor wishes to ensure that it complies with DP (A) the feedback has been acknowledged and Design Principle B has been amended to: “*Provide sufficient airspace to meet all reasonable technical requirements for the Watchkeeper RPAS platform that are required to facilitate safe access to and from SPTA and usage of Keevil Airfield*”. It is thought that this change will ensure that the Design Options are bounded in their objective. Any concerns over airspace covering all possible emergency scenarios will be covered in DP (C).

Outcome: DP (B) amended to reflect stakeholder concerns and remains priority 2.

**DP (C). Minimise the impact to other airspace users, both in terms of activation and volume of airspace required.**

A Stakeholder has requested that a fully comprehensive list of Crossing Services must be included in the Design Principles and raised the issue of inefficiency in promulgation of previously used notification methods. The Sponsor believes that the addition of a Crossing Service as a Design Principle would significantly limit the Design Options put forward in Stage 2; however, airspace accessibility, as covered in DP (D) as well as interactions with other airspace users will be explored in the Design Options stage. The Sponsor has therefore not included Crossing Services into this Design Principle.

Several local residents requested that the impact of noise on local residents be included in this Design Principle or as a separate DP. Whilst noise abatement falls more into operating procedures the Sponsor has created a separate Design Principle to minimise the impact of operating noise to local residents.

Outcome: No change to this DP (C) but additional DP added to reflect views of local residents.

**DP (D). Endeavour to make the airspace as accessible as possible to all types of air user.**

A Stakeholder raised concern that the phrase “endeavour” unnecessarily softens the requirement to make the airspace accessible to others. As discussed in Section 1 the Sponsor recognises the potential impact of an airspace change within valuable Class G airspace. The Sponsor acknowledges this concern and has therefore removed the word “endeavour”.

A Stakeholders also highlighted that the time of day and year will vary the type of users requiring access to the airspace and that Watchkeeper can use this to prioritise its operations accordingly. The Sponsor agreed that the users will vary at different times, but that this is not a Design Principle however these concerns will be captured within DP(C). Airspace use levels will be considered as part of the Options Development.

Outcome: Original DP amended to ‘*Make the airspace as accessible as possible to all types of air users*’ and the priority remains 4<sup>th</sup>.

**DP(E). Use standard airspace structure where possible (conformity, simplicity and safety).**

A Stakeholder raised the concern that this Design Principle may stifle flexibility of options if only standard airspace structures must be used.

The Sponsor believes that ‘standard airspace structures’ provides sufficient flexibility to allow a variety of Design Options to be explored. The intent of this DP is to ensure that any solution would take on familiar attributes to recognised airspace structures in order to increase user familiarity.

Outcome: No change to DP(E) and remains priority 5.

**Additional Proposed Design Principles**

Design Principle Proposed		Design Principle Accepted	Response
1	Minimise the impact of operating noise to local residents	Yes	The Sponsor agrees and will add a Design Principle to ensure that the noise impact is factored into potential design principles.
2	Creative solutions to local issues	No	The Sponsor supports your suggestion for encouraging creative solution to this local issue and welcomes discussions moving forward to produce simple and flexible operating procedures. However, we believe this is best discussed at a later Stage after the development of different Design Options.
3	Employ operational and communication processes that enable timely, flexible and simple access for other airspace users.	No	This will not be accepted as a Design Principle as DP (C) and (D) will ensure factors relating to timely airspace access and flexibility are sufficiently considered.
4	The overall composite impacts of ALL relevant ACP plans must be considered.	No	This is not considered a Design Principle. Having sent the Engagement Letter to both Bristol Airport and the Airspace Change Organising Group

			(ACOG) as part of this Stage 1 process, we feel that this is the most appropriate way to determine whether any crossover exists. However, we intend to keep monitoring these during the subsequent ACP stages.
5	Anticipated activity should be based on modelling and evidence	No	This is something that can be considered at a later date in the ACP process but we do not feel that it is warranted at the Design Principles stage.
6	Interoperability with existing e-conspicuity	No	This is a platform specific comment and not a Design Principle.

## Final Proposed Design Principles

The MOD believes that safety should always remain Priority 1.

Providing airspace to best meet the technical requirements of Watchkeeper in order to meet training and operational requirements should be priority 2.

The remaining DP's focus on the potential impact, both for air users and local residents and are all deemed to be of equal importance. With limited feedback it was difficult to meaningfully prioritise DP's (C) to (E) therefore they remain as first drafted.

DP	Design Principle	Priority
A	Provide a safe environment for all airspace users	1
B	Provide sufficient airspace to meet all reasonable technical requirements for the Watchkeeper RPAS platform that are required to facilitate safe access to and from SPTA and usage of Keevil Airfield.	2
C	Minimise the impact to other airspace users, both in terms of activation and volume of airspace required.	3
D	Make the airspace as accessible as possible to all types of air user.	4
E	Use standard airspace structure where possible (conformity, simplicity and safety).	5
F	Minimise the impact of operating noise to local residents	6

## Section 3

### Next Steps

This document aims to provide evidence to the CAA to support Step 1B of the CAP 1616 process and will be submitted in time to meet the Define Gateway on 17 Dec 21.

The planned timeline, as agreed with the CAA in Stage 1A, remains as follows:

STAGE	DATE
DEFINE GATEWAY	17 DEC 21
DEVELOP AND ASSESS GATEWAY	25 FEB 22
CONSULT GATEWAY	29 APR 22
UPDATE AND SUBMIT	26 AUG 22
DECIDE GATEWAY	24 FEB 23
IMPLEMENT (TARGET AIRAC)	15 JUN 23

Submit to AIS by 17 Mar

**Stakeholder Feedback Analysis**

<b>Stakeholders Contacted</b>		
<b>Name</b>	<b>Category</b>	<b>Response Received</b>
2 Group DAAM	MOD	No
Aircraft Owners and Pilots Association (AOPA)	NATMAC	No
Airspace Change Organising Group (ACOG)	NATMAC	No
Airspace4All	NATMAC	No
Army Aviation Centre, Middle Wallop	MOD	No
Army Flying Association, Middle Wallop	Local Aviation	No
Army Gliding Club, Wyvern	MOD	No
Association of Remotely Piloted Air Systems (ARPAS-UK)	NATMAC	No
Aviation Environment Federation (AEF)	NATMAC	No
Avon Hang Gliding and Paragliding Club	Local Aviation	No
Bannerdown Gliding Club	MOD	Yes
Bath Wilts & North Dorset Gliding Club	Local Aviation	Yes
Bowerchalke Airfield	Local Aviation	No
Bristol & Gloucestershire Gliding Club / Nympsfield Airfield	Local Aviation	No
Bristol Airport	Local Aviation	Yes
British Airline Pilot Association (BALPA)	NATMAC	No
British Balloon and Airship Club	NATMAC	No
British Business and General Aviation Association (BBGA)	NATMAC	No
British Gliding Association (BGA)	NATMAC	Yes
British Gliding Association National Airspace Committee	NATMAC	Yes
British Hang Gliding and Paragliding Association (BHPA)	NATMAC	No
British Helicopter Association (BHA)	NATMAC	Yes
British Microlight Aircraft Association (BMAA) / General Aviation Safety Council (GASCo)	NATMAC	No
British Model Flying Association (BMFA)	NATMAC	No
British Skydiving	NATMAC	No
Brown Shutters Farm Airfield	Local Aviation	No
Charlton Park Airfield	Local Aviation	No
Clench Common Microlight Site	Local Aviation	No
Compton Abbas Airfield	Local Aviation	No
Cotswold Aiport (Kemble)	Local Aviation	No
Cotswold Gliding Club / Aston Down Airfield	Local Aviation	No
Coulston Parish Council	Local Area	Yes
Craysmarsh Farm Airfield	Local Aviation	No
Defence Airspace and Air Traffic Management (DAATM)	MOD	No
Devizes (Coate) Airfield	Local Aviation	No
Devizes (Urchfont) Airfield	Local Aviation	No
Dorset and Somerset Air Ambulance	Local Aviation	No
Draycot Aerodrome, Swindon	Local Aviation	No
Drone Major	NATMAC	No
Erlestoke Parish Council	Local Area	No

Friends of Steeple Ashton	Local Area	Yes
Garston Farm Airfield, Chippenham	Local Aviation	No
General Aviation Alliance (GAA)	NATMAC	No
HeliAir Thruxton	Local Aviation	No
Helicopter Club of Great Britain (HCGB)	NATMAC	No
Henstridge Airfield	Local Aviation	No
HQ 1 Group	MOD	Yes
HQ 2 Group	MOD	No
HQ 22 Group	MOD	No
Joint Helicopter Command (JHC)	MOD	No
Keevil Parish Council	Local Area	No
Light Aircraft Association (LAA)	NATMAC	No
Local Pilot	Local Aviation	Yes
Local Resident - Coulston	Local Resident	Yes
Lydeaway Field, Devizes	Local Aviation	No
Manor Farm Airfield, Pewsey	Local Aviation	No
Membury Airfield	Local Aviation	No
Military Airspace Management Cell	MOD	Yes
Military Aviation Authority (MAA)	MOD	No
MOD Boscombe Down	MOD	Yes
National Air Traffic Service (NATS)	NATMAC	No
National Police Air Service (NPAS)	NATMAC	No
Oaksey Park Airfield	Local Aviation	No
PPL/IR (Europe)	NATMAC	No
RAF Brize Norton	MOD	Yes
Rivar Hill Gliding Site (Shalbourne Gliding)	Local Aviation	No
RNAS Yeovilton	MOD	Yes
Salisbury Plain Air Operations	MOD	No
Steeple Ashton Parish Council	Local Area	No
UK Airprox Board (UKAB)	NATMAC	No
UK Flight Safety Committee (UKFSC)	NATMAC	No
USAF Europe	MOD	No
Wadswick Airfield	Local Aviation	No
Wessex Model Flying Club	Local Aviation	No
Western Air Thruxton / Vantage Aviation	Local Aviation	No
White Ox Mead Airfield	Local Aviation	No
Wiltshire Air Ambulance	Local Aviation	Yes
Wiltshire County Council	Local Area	No
Wing Farm Microlight Site	Local Aviation	No
Yatesbury Microlight Site	Local Aviation	No

Stage 1 B - Draft Design Principle Feedback						
DP No	Design Principle	Response From	Feedback from Stakeholder	Analysis by Change Sponsor	DP Change / Addition required	Revised DP
A	Provide a safe environment for all airspace users.	Local Resident - Coulston	Principle A expanded to include the safety of airspace users, army ground personnel and the inhabitants of the surrounding areas.	The Sponsor agrees that safety to all air users and personnel and residents on the ground are paramount, however, safety considerations to those on the ground are taken into account during operating procedures and is therefore not considered to be an Airspace Design Principle	No	
B	Provide sufficient airspace to meet all technical requirements for the Watchkeeper RPAS platform.	Bath Wilts & North Dorset Gliding Club	For <b>Draft Design Principle B</b> we would wish to see a <b>test of reasonableness included</b> . Providing “sufficient airspace to meet <b>all</b> technical requirements for the Watchkeeper RPAS platform” is an understandable aspiration for the MOD but opens the door to the covering of every possible eventuality, however unlikely or inconsequential they might be.	The requirement will be amended. However, it is important to note that future Design Options will be judged against all Design Principles. As such as we feel that Design Principle C- ‘Minimise the impact to other airspace users, both in terms of activation and volume of airspace required’ will offset any unreasonable airspace Design Options.	Yes	Provide sufficient airspace to meet all reasonable technical requirements for the Watchkeeper RPAS platform that are required to facilitate safe access to SPTA and usage of Keevil
C	Minimise the impact to other airspace users, both in terms of activation and volume of airspace required.	BGA	A fully comprehensive list of crossing service options should be an essential part of the design process. The BGA has collated evidence of significant shortcomings in the efficacy of the crossing service and inefficient promulgation of	The Sponsor believes that the addition of a Crossing Service as a design principle would significantly limit the Design Options put forward in Stage 2; however, <b>airspace accessibility (DP D)</b> and	No	



			activation during the recent TDA operation.	interactions with other airspace users will be explored in the Design Options stage.		
		Local Resident	An additional principle should be added to minimise the noise and disruption to residents living near the flight path, in particular by minimising the time spent by RPAS accessing and returning from SPTA.	The Sponsor agrees and will add a Design Principle to lessen the Noise Impact on local residents.	Yes	Additional DP added: Minimise the impact of operating noise to local residents.
D	Endeavour to make the airspace as accessible as possible to all types of air user.	Bath Wilts & North Dorset Gliding Club	In <b>Draft Design Principle D</b> we propose that the words "endeavour to" should not be used as they soften the requirement unnecessarily.	The Sponsor agrees. The words "endeavour to" will be removed from this Design Principle.	Yes	Make the airspace as accessible as possible to all types of air user.
		BGA	It should be incumbent upon the sponsor to detail the possible crossing services it is looking to create for scrutiny by the regulator and the potential users (generally the GA community).	As per the response to feedback on DP (C) relating to Crossing Services.	No	
		BGA	Time of day and time of year parameters are an important factor. Inherent deconfliction with other airspace users' operations is possible by understanding when others operate in the airspace and prioritising Watchkeeper operations accordingly.	This in itself is not a Design Principle and will be considered as part of Option Development	No	

E	Use standard airspace structure where possible (conformity, simplicity and safety).	Bath Wilts & North Dorset Gliding Club	<p>Before the TDA period in summer 2021 MOD staff indicated that a local frequency would be used for a crossing service. In the event, and with no explanation, this turned out not to be the case. This increased the difficulty of obtaining a DACS as the Boscombe Down controllers had limited information of the local situation at Keevil. A locally provided service would have been more knowledgeable and flexible for airspace users. Published data now shows that only 21 live sorties were conducted when the TDA was NOTAMed for many more full days than that. This gives little confidence that the needs of other airspace users were given reasonable weight or priority, or that they would in the future. A more locally managed and controlled solution could have alleviated this. Draft Design Principle E could be employed to work against such flexibility as it dictates the use of standard airspace structures where possible.</p>	<p>On days when the airspace was not required, the NOTAM was cancelled as soon as possible, most often before 1200hrs. A crossing service was provided at all times by Boscombe Zone when Watchkeeper was flying and the airspace was active. On days where this was not possible the airspace was deactivated and Watchkeeper did not fly. Additionally, the airspace was not utilised at the end of July in order to facilitate the Inter-Services Gliding Competition.</p>	No	
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**Additional Proposed Design Principles**

DP No	Design Principle	Response From	Feedback from Stakeholder	Analysis by Change Sponsor	DP Change / Addition required	Revised DP
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	<p><b>Creative solutions to local issues</b></p>	<p>Bath Wilts &amp; North Dorset Gliding Club</p>	<p>We would suggest a <b>further design principle that encourages creative solutions to local issues</b> arising from any use of the proposed airspace. Before the TDA period in summer 2021 MOD staff indicated that a local frequency would be used for a crossing service. In the event, and with no explanation, this turned out not to be the case. This increased the difficulty of obtaining a DACS as the Boscombe Down controllers had limited information of the local situation at Keevil. A locally provided service would have been more knowledgeable and flexible for airspace users. Published data now shows that only 21 live sorties were conducted when the TDA was NOTAMed for many more full days than that. This gives little confidence that the needs of other airspace users were given reasonable weight or priority, or that they would in the future. A more locally managed and controlled solution could have alleviated this. Draft Design Principle E could be employed to work against such flexibility as it dictates the use of standard airspace structures where possible.</p>	<p>The Sponsor supports your suggestion for encouraging creative solution to this local issue and welcomes discussions moving forward to produce simple and flexible operating procedures. However, we believe this is best discussed at a later Stage after the development of different Design Options. We believe it would be unnecessarily restrictive to add this as a Design Principle as we are only able to operate within the current national framework of airspace activation methods and flight information provisions.</p>	<p>No</p>	
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	<p><b>Employ operational and communication processes that enable timely, flexible and simple access for other airspace users.</b></p>	<p>Bath Wilts &amp; North Dorset Gliding Club</p>	<p>We propose the following additional design principle.  <b>Employ operational and communication processes that enable timely, flexible and simple access for other airspace users.</b></p>	<p>This is not a design principle. This is considered an operating procedure and consideration will be developed in order to achieve Design Principle D.</p>	<p>No</p>	
	<p><b>The overall composite impacts of ALL relevant ACP plans must be considered.</b></p>	<p>BGA</p>	<p>Recognition that GA including sporting and recreational aviation has legitimate <b>rights of access to airspace</b>. We note that the airspace change currently ongoing in the Bristol area may have a significant impact on sporting and recreational aviation access to Class G airspace. There should be a <b>design principle confirming that the overall composite impacts of ALL relevant ACP plans must be considered.</b></p>	<p>Having engaged with Bristol Airport, as well as the Airspace Change Organising Group (ACOG) as part of this Stage 1 process, we feel that this is the most appropriate way to determine whether any crossover exists. We intend to keep monitoring these during the subsequent ACP stages.</p>	<p>No</p>	
	<p><b>Anticipated activity should be based on modelling and evidence</b></p>	<p>BGA</p>	<p>Expectation that data used, particularly forecasts, includes details of any and all assumptions and available supporting evidence.  <b>Anticipated activity should be based on modelling and evidence</b> rather than subjective opinion. To quantitatively prove adherence to the CAP1616 process, the MOD could show a multitude of flight-path options together with an associated risk analysis to help stakeholders understand the design process that will deliver the best compromise between operational necessity and minimal use of airspace.</p>	<p>This is something that can be considered at a later date in the ACP process but we do not feel that it is warranted at the Design Principles stage. Operating requirements based on required flight paths vs risk will be covered in Design Principle B.</p>	<p>No</p>	

	<b>Interoperability with existing e-conspicuity</b>	BGA	<b>Examine options for interoperability with existing e-conspicuity</b> , eg ADS-B, FLARM and PilotAware. The BGA strongly believes that the MOD should show detailed evidence explaining why this advanced electronic platform has not been equipped with technology (TCAS or equivalent) to allow effective integration with other airspace users. With a base cost of £10-£15million per Watchkeeper aircraft it would seem a reasonable and cost-effective option. The equipage, installation and running of such technology could render segregated airspace requirements unnecessary as well as making operations safer for the Watchkeeper. The regulator may well consider this to be an appropriate balance of priorities.	Watchkeeper is fitted with ADS-B Out, it is not fitted with TCAS. Regardless, ADSB and TCAS are not approved detect and avoid capabilities and therefore a new system would have to be procured. This is not considered cost-effective in the short term. It is being considered as part of an upgrade to the capability but will not be delivered in the next 5 years. The design of this ACP must therefore exclude the assumption that WK will have an approved detect and avoid capability. As part of the ongoing consultation throughout the process, the MoD plans to host stakeholders for a capability visit.	No	
F	<b>Minimise the impact of operating noise to local residents</b>	Local Resident - Coulston	We feel that a <b>Design Principle</b> should be included that considers the noise impact on local residents. This should be about minimising noise for the benefit of such residents.	The Sponsor agrees and will add a Design Principle to lessen the Noise Impact on local residents.	Yes	Minimise the impact of operating noise to local residents
	<b>Minimise the impact of operating noise to local residents</b>	Local Resident - Coulston	Minimise the noise and disruption to residents living near the flight path, in particular by minimising the time spent by RPAS accessing and returning from the SPTA.	The Sponsor agrees and will add a Design Principle to lessen the Noise Impact on local residents.	Yes	Minimise the impact of operating noise to local residents

Additional Comment from Stakeholders						
DP No	Design Principle	Response From	Feedback from Stakeholder	Analysis by Change Sponsor	DP Change / Addition required	Revised DP
	<b>Design Principles should be agreed between the parties.</b>	BGA	Design Principles should be agreed between the parties. We would expect to see constructive discussion concerning the suggestions that we have made. Altogether, these design concepts could result in quantitatively driven analysis that helps all airspace stakeholders understand the needs and options available to the sponsor, which in turn will lead to a suitably informed judgement which balances operational need of the sponsor and efficient use of airspace.	Annex D to CAP 1616 states that sponsors are to create 'a rationale for accepting or rejecting design principles put forward by stakeholders for assessment by the CAA' rather than agree Design Principles between parties. The gateway documentation will outline this rationale when a proposed DP was not used by the Sponsor.		
	<b>Requirement for rigorous analysis of all options to minimise airspace loss to other users.</b>	BGA	Assessment Meeting Minutes (20/9/21): Re-iteration of point 18. Although the stakeholders were identified in the TDA work, the ACP processes and engagement process must be very much more thorough than those utilised during the TDA activities. It is our understanding that the sponsor should be expected to carry out much more rigorous analysis of all potential options to minimise loss of airspace to other users.	The Sponsor agrees. Section 1 of the Stage 1 Gateway Document outlines how stakeholders were identified.		
	<b>Alternative options for Segregated Airspace</b>	BGA	Assessment Meeting Minutes (20/9/21): Re point 37. We agree that serious consideration should be given to an	The requirement for Segregated Airspace is currently mandated.		

			alternative to segregated airspace.			
	<b>Management of TDA previously used</b>	BGA	<p>The TDA was established as active for 64 days during which Watchkeeper flew 21 sorties. Our contention is that this is intolerably inefficient use-age of valuable Class G airspace and particularly so when coupled with the exposed ineffectiveness of the promulgated crossing service. We expect the CAA to take this into account when assessing the sponsors ability to deliver management of Class G airspace.</p>	<p>This statistic in isolation does not take into consideration any causal factors. For example, when a sortie was cancelled due to poor weather the NOTAM was cancelled as soon as possible. The airspace was always initially booked at least 24 hours in advance (as per the conditions laid out in our TDA documentation) but was cancelled as soon as possible once a decision not to fly had been made. The sponsor believes Design Principle C captures this concern for this ACP.</p>		
	<b>TDA Stakeholder Engagement method</b>	BGA	<p>The statement 'It also provided an opportunity for local stakeholders to engage with and understand the Watchkeeper capability and operating procedures' suggests it is the stakeholders responsibility to understand this detail. Going forward, we expect the relevant capability and operating procedures to form part of the ACP justification.</p>	<p>The sponsor disagrees with this. This refers to the opportunities that local stakeholders had to visit the airfield. This was just one of many ways in which stakeholder engagement occurred during the TDA period.</p>		

	<p><b>Gliding Information to be considered</b></p>	<p>Bath, Wilts and North Dorset Gliding Club.</p>	<p>We responded to the 2020/21 TDA consultation, providing significant information to the sponsor regarding our own gliding operations in the region and those of the wider gliding community. This included heat maps showing glider flights in the vicinity of Keevil Airfield over the course of one year. We would expect all such information previously submitted to be considered during this current ACP's progress. If this is not to be so then we <b>request full disclosure of that fact</b> so that we can resubmit relevant information.</p>	<p>The information provided during the TDA engagements were considered at the time and shaped the Sponsors understanding during the previous ACP. In the interest of being thorough, the Sponsor requests all information that the Stakeholder wishes to be considered to be submitted during the appropriate Stage.</p>		
	<p><b>Request to restart Stage 1</b></p>	<p>Bath, Wilts and North Dorset Gliding Club.</p>	<p>The MOD Design Principles consultation document dated 22<sup>nd</sup> October 2021 forms the basis for this stage of the consultation. However, it was still not listed or published on the CAA's Airspace Change Portal as a relevant document as recently as 13<sup>th</sup> November, when the closing date for submissions was stated in that document to be 19<sup>th</sup> November. This damages confidence in the application of the CAP1616 process and undermines the MOD's stated desire for a fair and transparent dialogue. Others who may wish to comment have been denied access to the relevant information. <b>We</b></p>	<p>The Sponsor believes that this is not a mandated requirement in CAP 1616. The Letter will be uploaded to the Portal as evidence of Stage 1 engagement, forming part of the wider Gateway submission. The Sponsor does not believe that the Stakeholders are negatively impacted by not having this letter published on the Portal at the beginning of this Stage.</p>		



			<b>assert that this step in the process should be restarted</b> in order for full transparency to be achieved.			
	<b>Request for list of Stakeholders contacted</b>	Bath, Wilts and North Dorset Gliding Club.	In that same document under the heading of Design Principles, para 2 contains a statement that “the MOD will engage with NATMAC members and has also selected local stakeholders from an area within a radius of approximately 30 miles of Keevil Airfield”. It remains unclear who has been “selected” by the MOD for consultation and what rigour has been applied to creating the list of those to be consulted. <b>Evidence should be published of who exactly has been included in this consultation.</b> We would expect, as a minimum, all airfields, airstrips and flying clubs within that radius to be contacted directly. The sponsor should not make assumptions about the need for those potentially affected to be discounted. <b>Should the list of consultees be shown not to have included such candidates then we further assert that this stage in the consultation will have been inadequately conducted and should be re-started.</b>	Our stakeholder engagement strategy forms part of the Stage 1 Gateway document. This outlines how stakeholders were identified and provides a rationale for the methods of engagement. Additionally, the list of stakeholders does not need to be pre-published and the Sponsor believes that it is the CAA’s responsibility to determine whether the engagement was satisfactory.		

	<b>Club representation</b>	Bath, Wilts and North Dorset Gliding Club.	Please ensure that this response is considered as representing the 120 members of the Club. It is not an individual response and should not be considered as such.	The Sponsor acknowledge that all clubs, national body and community responses received are representative of all their members and not the views of a single person.		
	<b>Replied with support / no comment</b>	Friends of Steeple Ashton	While some resulting noise is inevitable around the southern edge of the village, we have become used to considerably higher fixed-wing and helicopter aircraft volumes in the past, and we look forward to seeing you back on the airfield in the near future.			
	<b>Replied with no objections</b>	DAATM	Please see attached responses to your Design Principles engagement letter. In summary, there are no objections to your design principles, or suggestions for amendments/new Design Principles, from MOD stakeholders.			
	<b>Replied with support / no comment</b>	Wiltshire Air Ambulance	Has the airspace proposal changed from what you used this year and are the same deconfliction measures going to remain?	Whilst the airspace may ultimately differ from the TDA the same deconfliction measures, as laid out in a Letter of Agreement at the time, would be sought in order to ensure HEMS are not affected.		
	<b>Replied with support / no comment</b>	Steeple Ashton Parish Council	Dear Capt Goodman. Thank you for this information, which was considered at a meeting of the Parish Council held last night. I have been directed by the Chair and members to inform you that the PC welcomes the proposals you outline and has resolved its			

			positive support for them.			
	<b>Replied with support / no comment</b>	Bristol Airport	As far as I know there have been no dependencies identified between your ACP and ours, so we should have little comment.			
	<b>Replied with support / no comment</b>	British Helicopter Association	The BHA has no objections to the Design proposals as written. We trust you are liaising with Wiltshire Air Ambulance?	Confirmed that engagement with WAA had occurred.		
	<b>Replied with questions for future comment.</b>	Local Airstrip User	I fly an aircraft from nearby Wadswick farm strip (South East just outside Colerne ATZ). The thing missing from the document is a map & diagram of the size and altitude of the proposed airspace - can you provide this please?	At this stage there are no airspace designs (or dimensions) as the initial stage of an Airspace Change Proposal is to outline the principles in which the airspace solution should follow. Therefore we are unable to provide you with a proposed airspace solution at this stage in the process. We do however welcome any feedback you may have on the draft principles outlined in the engagement letter.		

## Raw Stakeholder Feedback

### Keevil ACP-2021-006 Design Principles Feedback

Original Email sent to all Stakeholders

Good afternoon,

#### **AIRSPACE CHANGE PROPOSAL ACP-2021-006 STAGE 1 ENGAGEMENT LETTER**

Please find attached an engagement letter from the Ministry of Defence regarding Airspace Change Proposal ACP-2021-006 which is seeking to enable Beyond Visual Line of Sight Operations of Remotely Piloted Air Systems from Keevil Airfield, Wiltshire.

The Airspace Change Proposal, in accordance with Civil Aviation Publication (CAP) 1616, is currently at Stage 1 and feedback is being sought from potential stakeholders on the Design Principles of a proposed change in airspace.

Please feel free to disseminate this information as you see fit. Alternatively, if you do not wish to be included in future consultation on this Airspace Change Proposal please respond to this email and we will remove you from the stakeholder contact list.

The deadline for feedback on the Design Principles is **Friday 19<sup>th</sup> November**.

Kind regards,

██████████

Capt ██████████ | Project LOVERIDGE lead | 47<sup>th</sup> Regiment Royal Artillery | Horne Barracks | LARKHILL | Wiltshire | SP4 8QE | Mil: ██████████ | Skype: + ██████████  
| MOD<sup>NET</sup> [47RA-Project-LOVERIDGE@mod.gov.uk](mailto:47RA-Project-LOVERIDGE@mod.gov.uk)

Attachment to the above email (Next Page)

October 2021

## AIRSPACE CHANGE PROPOSAL ACP-2021-006

### Introduction

Throughout Spring and Summer 2021 the Ministry of Defence, specifically 47<sup>th</sup> Regiment Royal Artillery, successfully trialled the operation of the British Army Watchkeeper Remotely Piloted Air System (RPAS) from Keevil Airfield, Wiltshire.

This was achieved through the publication of a Temporary Danger Area (TDA) that was approved by the CAA after consultation with local and national stakeholders. This was required in order to facilitate the Beyond Visual Line of Sight operation of Watchkeeper from Keevil in order to provide critical training objectives over Salisbury Plain Training Area.



In total, 21 live sorties were conducted which provided a significant output for aircrew, groundcrew and engineers in a unique and challenging training environment. It also provided an opportunity for local stakeholders to engage with and understand the Watchkeeper capability and operating procedures.

As a result of this success, it is now the intent of the MOD to fly Watchkeeper from Keevil Airfield on a more regular basis. The long-term output from Keevil Airfield is anticipated to provide a bespoke location to train, generate and enhance RPAS capability whilst supporting essential wider military training on Salisbury Plain.

### Permanent Airspace Change Proposal

The MOD has initiated an Airspace Change Proposal (ACP) to facilitate the safe operation of Watchkeeper in accordance with all UK Military Aviation Authority policy and legislation for RPAS operations.

Any change to UK airspace is required to follow a set process laid down in the Civil Aviation Publication (CAP) 1616. This process aims to ensure a fair and transparent dialogue between the Change Sponsor (in this case the MOD) and any affected stakeholders.

The CAP 1616 process comprises seven stages. Each stage is considered by the CAA sequentially based on a pre-agreed timeline<sup>5</sup>. The process is not solution-driven and each stage informs the next. In this instance, the requirement is to fly large RPAS Beyond Visual Line of Sight between Keevil Airfield and Salisbury Plain Danger Area EG D123. This was presented to the CAA at the first stage of the ACP process and the CAA has agreed that

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<sup>5</sup> The timeline for this ACP can be found online on the CAA Airspace Portal

an airspace change is an appropriate means by which to achieve this. All documentation relating to the ACP can be found on the CAA's Airspace Portal.

### Design Principles

The first stage of the CAP 1616 process is 'DEFINE' and Sponsors are required to develop design principles on which to then take forward when developing options later in the process. The MOD wishes to engage with stakeholders and is asking for your feedback on the initial draft principles. The Sponsor will then submit a final Design Principles document to the CAA after all feedback has been received.

The MOD will engage with NATMAC members and has also selected local stakeholders from an area within a radius approximately 30 miles of Keevil Airfield, many of whom were considered previously during the Temporary Danger Area proposal.

The MOD would like to understand which elements of the airspace design principles you deem important and would like to be considered. At this stage we are not seeking feedback on the wider proposal as stakeholders will have an opportunity to do this later in the Airspace Change process once the proposal has been developed in greater detail.

As a stakeholder you are now invited to consider the draft design principles. The list is not exhaustive, but you may wish to comment on the following:

- Are there any other design principles you would like the MOD to consider?
- Are there any design principles that you would you like the MOD to consider discounting?
- Should the MOD prioritise some design principles ahead of others? And if so, which principles are the most important to you?
- Do you require / would you like any more detail to be included in the design principles?

Any additional detail or reasoning behind your feedback is also encouraged.

### Draft Design Principles

<b>A</b>	Provide a safe environment for all airspace users.
<b>B</b>	Provide sufficient airspace to meet all technical requirements for the Watchkeeper RPAS platform.
<b>C</b>	Minimise the impact to other airspace users, both in terms of activation and volume of airspace required.
<b>D</b>	Endeavour to make the airspace as accessible as possible to all types of air user.
<b>E</b>	Use standard airspace structure where possible (conformity, simplicity and safety).

### Feedback

All the details of this airspace change proposal are available on the CAA's Airspace Change Portal. The ACP identification number is ACP-2021-006.

Feedback can be provided in the following ways:

Email: [47RA-Project-LOVERIDGE@mod.gov.uk](mailto:47RA-Project-LOVERIDGE@mod.gov.uk)

Letter: Project LOVERIDGE

FAO Regimental Operations Officer  
47<sup>th</sup> Regiment Royal Artillery  
Horne Barracks  
SALISBURY  
Wiltshire  
SP4 8QE

We would also like to take this opportunity to offer to brief you personally if you have any specific questions regarding our proposal.

**Responses regarding the Draft Design Principles are required by Friday 19<sup>th</sup> November 2021.**

Mr [REDACTED]

**From:** 47RA-Project-LOVERIDGE (MULTIUSER)  
**Sent:** 26 October 2021 20:33  
**To:** '[REDACTED]' <[REDACTED]>  
**Subject:** RE: Airspace Change Proposal ACP-2021-006

Hello [REDACTED],

Thank you for your email.

At this stage there are no airspace designs (or dimensions) as the initial stage of an Airspace Change Proposal is to outline the principles in which the airspace solution should follow. Therefore we are unable to provide you with a proposed airspace solution at this stage in the process. We do however welcome any feedback you may have on the draft principles outlined in the engagement letter.

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

Kind regards,

[REDACTED]

Capt [REDACTED] | Project LOVERIDGE lead | 47<sup>th</sup> Regiment Royal Artillery | Horne Barracks | LARKHILL | Wiltshire | SP4 8QE | Mil: | Skype: | MOD<sup>NET</sup> [47RA-Project-LOVERIDGE@mod.gov.uk](mailto:47RA-Project-LOVERIDGE@mod.gov.uk)

**From:** [REDACTED] <[REDACTED]>  
**Sent:** 22 October 2021 18:40  
**To:** 47RA-Project-LOVERIDGE (MULTIUSER) <[47RA-Project-LOVERIDGE@mod.gov.uk](mailto:47RA-Project-LOVERIDGE@mod.gov.uk)>  
**Subject:** Airspace Change Proposal ACP-2021-006

Hello,

I fly an aircraft from nearby Wadswick farm strip (South East just outside Colerne ATZ).

The thing missing from the document is a map & diagram of the size and altitude of the proposed airspace - can you provide this please?

Thanks

=====

Sent from mobile pls excuse brevity and typos

[REDACTED]



**British Helicopter Association**

**From:** [REDACTED] <[REDACTED]>

**Sent:** 25 October 2021 10:36

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

**Subject:** RE: Airspace Change Proposal ACP-2021-006 Stage 1 Engagement Letter

[REDACTED]

The BHA has no objections to the Design proposals as written. We trust you are liaising with Wiltshire Air Ambulance?

We wish to remain engaged with the ACP proposal as you work through it.

Yours

[REDACTED]

CEO BHA

[REDACTED]

**From:** 47RA-Project-LOVERIDGE (MULTIUSER)  
**Sent:** 17 November 2021 15:30  
**To:** [REDACTED]  
**Subject:** RE: Airspace Change Proposal ACP-2021-006 Stage 1 Engagement Letter

Good afternoon [REDACTED],

Thank you for your feedback on the draft Design Principles of the Airspace Change Proposal to fly military Remotely Piloted Aircraft from Keevil Airfield and your early engagement in this process. A full analysis of your feedback will be presented to the CAA as part of our Stage 1 submission.

As a result of your feedback we will be looking to include an additional Design Principle that relates to noise abatement to ensure your concerns are sufficiently considered at the next stage of the process. However, the specifics of the flight path and operation between Keevil and Salisbury Plain falls more into the operating procedures of the aircraft rather than a Design Principle. Additionally, we note your point relating to the safety of inhabitants on the ground rather than just air users. Every Watchkeeper sortie is bound by strict regulations that protect the inhabitants of the surrounding villages. We therefore do not feel that this relates to a specific principle for airspace design as flight safety is paramount regardless of the airspace in which we are operating.

Further engagement that specifically relates to the aircraft and our procedures will be conducted in due course which we hope will alleviate your concerns.

I look forward to further engagement as this proposal progresses and we will ensure that we keep you updated any developments.

Kind regards,

[REDACTED]

Capt [REDACTED] | Project LOVERIDGE lead | 47<sup>th</sup> Regiment Royal Artillery | Horne Barracks | LARKHILL | Wiltshire | SP4 8QE | Mil: | Skype: | MOD<sup>NET</sup> [47RA-Project-LOVERIDGE@mod.gov.uk](mailto:47RA-Project-LOVERIDGE@mod.gov.uk)

**From:** [REDACTED] <[REDACTED]>  
**Sent:** 25 October 2021 16:41  
**To:** 47RA-Project-LOVERIDGE (MULTIUSER) <[47RA-Project-LOVERIDGE@mod.gov.uk](mailto:47RA-Project-LOVERIDGE@mod.gov.uk)>  
**Cc:** [REDACTED]  
**Subject:** RE: Airspace Change Proposal ACP-2021-006 Stage 1 Engagement Letter

Dear Captain [REDACTED],

Thank you for the Engagement letter and the opportunity to comment on the Design principles. I have to say that I am both surprised and disappointed that, following all the discussions during the trials in the summer, there is no mention in the list of minimising the impact on those on the ground. As we indicated at the Open Day, villagers in Coulston are generally very supportive of the army, but this is contingent on us being able to see that you are taking our quality of life into account, and the Design Principles as they stand refer solely to airspace users.

Specifically, I would like to see:

- Principle A expanded to include the safety of airspace users, army ground personnel and the inhabitants of the surrounding areas.
- An additional Principle to address my point above added at C, for example:
  - Minimise the noise and disruption to residents living near the flight path, in particular by minimising the time spent by RPAS accessing and returning from the SPTA

Best wishes

[REDACTED] ([REDACTED])

[REDACTED], Coulston

**Bristol Airport**

**From:** [REDACTED] <[REDACTED]>

**Sent:** 27 October 2021 15:21

**To:** Goodman, Robert Capt (47RA-RHQ-OpsO) <[REDACTED]>

**Subject:** ACP Stakeholder

Hi [REDACTED],

Please can you forward the engagement letter to myself and copy in our ANSP GM [REDACTED] (details below). I assume you guys are engaged with ACOG and as far as I know there have been no dependencies identified between your ACP and ours, so we should have little comment.

[REDACTED] details:

[REDACTED]

GM Air Traffic Services

Control Tower Building, Bristol Airport,

Bristol. BS48 3DY.

D: [REDACTED]

M: [REDACTED]

E: [REDACTED]@nats.co.uk

Many thanks,

[REDACTED]

[REDACTED]

Airfield Technical and Compliance Manager

Bristol Airport

Bristol

BS48 3DW

[REDACTED]

[REDACTED]

[www.bristolairport.co.uk](http://www.bristolairport.co.uk)



**Steeple Ashton Parish Council**

**From:** [REDACTED] <[REDACTED]>

**Sent:** 02 November 2021 10:25

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

**Subject:** RE: Airspace Change Proposal ACP-2021-006 Stage 1 Engagement Letter

Dear [REDACTED]

Thank you for this information, which was considered at a meeting of the Parish Council held last night.

I have been directed by the Chair and members to inform you that the PC welcomes the proposals you outline and has resolved its positive support for them.

Kind regards,

[REDACTED]

Parish Clerk

For and on behalf of

Steeple Ashton Parish Council

Tel: [REDACTED]

**Wiltshire Air Ambulance**

**From:** [REDACTED] <[REDACTED]>

**Sent:** 02 November 2021 22:12

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

**Subject:** Re: Airspace Change Proposal ACP-2021-006 Stage 1 Engagement Letter - Wiltshire Air Ambulance

Hi [REDACTED]

That's great. Contact me if you need anything

Regards

[REDACTED]

On 2 Nov 2021, at 19:24, 47RA-Project-LOVERIDGE (MULTIUSER) <[47RA-Project-LOVERIDGE@mod.gov.uk](mailto:47RA-Project-LOVERIDGE@mod.gov.uk)> wrote:

Hi [REDACTED],

Our intent would absolutely be to continue to same/ similar deconfliction measures as this summer. However, as this is a permanent ACP we are not allowed to 'jump the gun' and propose a solution so must start the process again in slower time- but learning from the procedures that we utilised this summer.

We would like to involve you further in the ACP process where different options are considered.

If you have any questions in the meantime please do not hesitate to ask.

Kind regards,

[REDACTED]

**Capt** [REDACTED] | Regimental Operations Officer | 47 Regt RA | Horne Barracks | Larkhill | SALISBURY | Wiltshire | SP4 8QE | Mil: [REDACTED] | Civ: [REDACTED] | Skype: + [REDACTED]

<image004.png>

**From:** [REDACTED] <[REDACTED]>

**Sent:** 02 November 2021 13:18

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

**Subject:** FW: Airspace Change Proposal ACP-2021-006 Stage 1 Engagement Letter - Wiltshire Air Ambulance

Hi [REDACTED],

Has the airspace proposal changed from what you uses this year and are the same deconfliction measures going to remain?

Happy to chat through if required

regards

[REDACTED]

**Capt**

**Chief Pilot**

**Wiltshire Air Ambulance**

T: [REDACTED]

M: [REDACTED]

**Wiltshire Air  
Ambulance, Outmarsh,  
Semington, Wiltshire,  
BA14 6JX**

<image002.png>

Registered charity  
number 1144097

**British Gliding Association**

**From:** [REDACTED] <[REDACTED]>  
**Sent:** 10 November 2021 11:22  
**To:** 47RA-Project-LOVERIDGE (MULTIUSER) <47RA-Project-LOVERIDGE@mod.gov.uk>  
**Subject:** Re: Airspace Change Proposal ACP-2021-006 Stage 1 Engagement Letter

[REDACTED],

I sent our comprehensive feedback over a week ago please confirm you have received it? Also, on the CAA ACP portal (<https://airspacechange.caa.co.uk/PublicProposalArea?pID=341>) your engagement letter does not appear.

Is this an oversight?

Thanks,

[REDACTED]

On 03/11/2021 15:30, [REDACTED] and [REDACTED] wrote:

[REDACTED],

Please find a document attached detailing the BGA response. Please acknowledge receipt and your estimate of next steps timings.

Regards,

[REDACTED]

## **BGA Response to Proposed Keevil DA Nov 3<sup>rd</sup> 2021**

The BGA welcomes the opportunity to participate in this ACP stakeholder consultation process. As a significant user of this airspace the association feels strongly that the ACP process should create a solution that enables reasonable and proportionate access to our community of pilots.

### **1. Comments on Draft Design Principles**

The BGA has a set of design principles that we believe reflects the obligations of airspace change sponsors to accommodate gliding activities. The following (including some of the design principles proposed by the sponsor) are relevant to this proposal:

- Recognition that GA including sporting and recreational aviation has legitimate **rights of access to airspace**. We note that the airspace change currently ongoing in the Bristol area may have a significant impact on sporting and recreational aviation access to Class G airspace. There should be a **design principle confirming that the overall composite impacts of ALL relevant ACP plans must be considered**. **Thank you for your feedback. Having engaged with Bristol Airport, as well as the Airspace Change Organising Group (ACOG) as part of this Stage 1 process, we feel that this is the most appropriate way**



**to determine whether any crossover exists. We intend to keep monitoring these during the subsequent ACP stages.**

- Expectation that data used, particularly forecasts, includes details of any and all assumptions and available supporting evidence. **Anticipated activity should be based on modelling and evidence** rather than subjective opinion. To quantitatively prove adherence to the CAP1616 process, the MOD could show a multitude of flight-path options together with an associated risk analysis to help stakeholders understand the design process that will deliver the best compromise between operational necessity and minimal use of airspace. **This is something that can be considered at a later date in the ACP process but we do not feel that it is warranted at the Design Principles stage.**
- Efficient consultation. CAP1616 specifically states that **stakeholder engagements must be considered with 2-way conversations throughout the process.** The BGA is keen to fulfil their part in this requirement.

Concerning your Design Principles C (Minimise the impact to other airspace users, both in terms of activation and volume of airspace required) and D (Endeavour to make the airspace as accessible as possible to all types of air user) plus a more general principle of Flexible use of airspace, we make the following comments:

- We fully endorse these proposed design principles. A fully comprehensive list of crossing service options should be an essential part of the design process. The BGA has collated evidence of significant shortcomings in the efficacy of the crossing service and inefficient promulgation of activation during the recent TDA operation. It should be **incumbent upon the sponsor to detail the possible crossing services it is looking to create for scrutiny by the regulator and the potential users** (generally the GA community). **The Sponsor believes that the addition of a Crossing Service as a design principle would significantly limit the Design Options put forward in Stage 2; however, airspace accessibility and interactions with other airspace users will be explored in the Design Options stage.**
- **Examine options for interoperability with existing e-conspicuity**, eg ADS-B, FLARM and PilotAware. The BGA strongly believes that the MOD should show detailed evidence explaining why this advanced electronic platform has not been equipped with technology (TCAS or equivalent) to allow effective integration with other airspace users. With a base cost of £10-£15million per Watchkeeper aircraft it would seem a reasonable and cost-effective option. The equipage, installation and running of such technology could render segregated airspace requirements unnecessary as well as making operations safer for the Watchkeeper. The regulator may well consider this to be an appropriate balance of priorities. **Watchkeeper is fitted with ADS-B Out, it is not fitted with TCAS. Regardless, ADSB and TCAS are not approved detect and avoid capabilities and therefore a new system would have to be procured. This is not considered cost-effective in the short term. It is being considered as part of an upgrade to the capability but will not be delivered in the next 5 years. The design of this ACP must therefore exclude the assumption that WK will have an approved detect and avoid capability. As part of the ongoing consultation throughout the process, the MoD plans to host stakeholders for a capability visit.**
- **Time of day and time of year parameters are an important factor.** Inherent deconfliction with other airspace users' operations is possible by understanding when others operate in the airspace and prioritising Watchkeeper operations accordingly.

Note - Design Principles should be agreed between the parties. We would expect to see constructive discussion concerning the suggestions that we have made. Altogether, these design concepts could result in quantitatively driven analysis that helps all airspace stakeholders understand the needs and options available to the sponsor, which in turn will lead to a suitably informed judgement which balances operational need of the sponsor and efficient use of airspace. **Annex D to CAP 1616 states that sponsors are to create 'a rationale for accepting or rejecting design principles put forward by stakeholders for assessment by the CAA' rather than agree Design Principle between parties. The gateway documentation will outline this rationale.**

## 2. Comments on current CAA portal Documents

Assessment Meeting Minutes (20/9/21):

- Re-iteration of point 18. Although the stakeholders were identified in the TDA work, the ACP processes and engagement process must be very much more thorough than those utilised during the TDA activities. It is our understanding that the sponsor should be expected to carry out much more rigorous analysis of all potential options to minimise loss of airspace to other users.
- Re point 37. We agree that serious consideration should be given to an alternative to segregated airspace.

## 3. General Comments on ACP letter published on 22/10/21

Re Introduction:

- The TDA was established as active for 64 days during which Watchkeeper flew 21 sorties. Our contention is that this is intolerably inefficient use-age of valuable Class G airspace and particularly so when coupled with the exposed ineffectiveness of the promulgated crossing service. We expect the CAA to take this into account when assessing the sponsors ability to deliver management of Class G airspace. **This statistic in isolation does not take into consideration any other factors. For example, when a sortie was cancelled the NOTAM was cancelled as soon as possible. The airspace had to be booked at least 24 hours in advance (as per the conditions laid out in our TDA documentation) but was cancelled as soon as possible once a decision not to fly had been made. Our statistics record 29 days where the NOTAM was cancelled; 18 days of which were cancelled before 1200hrs. On the remaining days, the NOTAM was active for activities that required the airspace to be active but may not have been recorded as 'live activities'. Of note, the airspace was also not activated for a period of time in July in order to facilitate the Inter-Services Gliding Competition at the airfield.**
- The statement 'It also provided an opportunity for local stakeholders to engage with and understand the Watchkeeper capability and operating procedures' suggests it is the stakeholders responsibility to understand this detail. Going forward, we expect the relevant capability and operating procedures to form part of the ACP justification. **The sponsor disagrees with this. This refers to the opportunities that local stakeholders had to visit the airfield. This was just one of many ways in which stakeholder engagement occurred during the TDA period. The Sponsor thanks the BGA for their feedback on the ACP Design Principles and will continue to engage closely as the ACP develops.**



BGA Airspace Committee 3.11.21

## Bath, Wiltshire and North Dorset Gliding Club

**From:** [REDACTED] <[REDACTED]>

**Sent:** 15 November 2021 09:25

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

**Cc:** [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>

**Subject:** Response to Airspace Change Proposal ACP-2021-006 Stage 1 Engagement Letter.

Dear [REDACTED]

Please find attached the response of the Bath, Wilts and North Dorset Gliding Club to your ACP Stage 1 Engagement Letter.

It is important to us that you should agree that this response is submitted on behalf of the 120 members of the Club and that it should be treated as such. It should not be treated as a response from a single individual.

In this response we question your proper application of the CAP1616 process at this specific stage. We believe that your communication of 22nd October should have been published on the CAA portal at the time you wrote to us and to some others. Today it is still not visible on the website. Furthermore we have no knowledge of to whom your 22nd Oct communication was addressed and who has therefore had the opportunity to respond. We understand that the CAA requires the consultation to be wider than that for the earlier TDA at Keevil. We believe that, as a minimum, you should publish such details for public comment before considering moving on with evaluation of any responses you might receive by 19th Nov.

I look forward to hearing from you acknowledging receipt of this response.

Yours faithfully

Copied to Chairman and CFI of BWNDGC, to BGA Chief Exec and [REDACTED], BGA Airspace committee.

[REDACTED]  
For and on behalf of The Bath Wilts and North Dorset Gliding Club  
[www.bwnd.co.uk](http://www.bwnd.co.uk)

The Airfield

Kingston Deverill

Warminster

Wilts

BA12 7HF

*Attachment from BWNDGC and Sponsor response in red*

## **Response to ACP-2-21-006**

### **Enabling BVLOS UAS Operations from Keevil Airfield.**

#### **The response of the Bath, Wilts and North Dorset Gliding Club.**

The Bath, Wilts and North Dorset Gliding Club operates from the airfield known as The Park at Kingston Deverill, between Warminster and Mere.

Ours is an operation which would be significantly impacted by the introduction of airspace as outlined in the ACP. It was adversely impacted by the Watchkeeper TDA period during the summer of 2021.

1. As a BGA affiliated Gliding Club **we fully support the BGA response** to this ACP, dated Nov 3<sup>rd</sup> 2021

2. Inclusion of previously supplied information.

This response is to the MOD letter of 22<sup>nd</sup> October 2021 and its call for comments on the Draft Design Principles proposed by the MOD. We responded to the 2020/21 TDA consultation, providing significant information to the sponsor regarding our own gliding operations in the region and those of the wider gliding community. This included heat maps showing glider flights in the vicinity of Keevil Airfield over the course of one year. We would expect all such information previously submitted to be considered during this current ACP's progress. If this is not to be so then we **request full disclosure of that fact** so that we can resubmit relevant information. **Thank you for this feedback. Indeed, during the previous Temporary Danger Area ACP, the Sponsor received details on gliding activities that helped to influence our procedures. However, as this is a new ACP we ask that you submit any information that you would like to be considered that is relevant to the new proposal. This information will be particularly helpful during the Design Options and consultation stages.**

3. Transparency and fairness in the application of CAP 1616

The MOD Design Principles consultation document dated 22<sup>nd</sup> October 2021 forms the basis for this stage of the consultation. However, it was still not listed or published on the CAA's Airspace Change Portal as a relevant document as recently as 13<sup>th</sup> November, when the closing date for submissions was stated in that document to be 19<sup>th</sup> November. This damages confidence in the application of the CAP1616 process and undermines the MOD's stated desire for a fair and transparent dialogue. Others who may wish to comment have been denied access to the relevant information. **We assert that this step in the process should be restarted** in order for full transparency to be achieved.

In that same document under the heading of Design Principles, para 2 contains a statement that "the MOD will engage with NATMAC members and has also selected local stakeholders from an area within a radius of approximately 30 miles of Keevil Airfield". It remains unclear who has been "selected" by the MOD for consultation and what rigour has been applied to creating the list of those to be consulted. **Evidence should be published of who exactly has been included in this consultation.** We would expect, as a minimum, all airfields, airstrips and flying clubs within that radius to be contacted directly. The sponsor should not make assumptions about the need for those potentially affected to be discounted. **Should the list of consultees be shown not to have included such candidates then we further assert that this stage in the consultation will have been inadequately conducted and should be re-started.** Our stakeholder engagement strategy forms part of the Stage 1 Gateway document. This outlines how stakeholders were identified and provides a rationale for the methods of engagement. We do not feel that there is a requirement to upload the engagement letter to the Portal at this stage (we will of course upload it as evidence of engagement). Additionally, the list of stakeholders does not need to be pre-published and the Sponsor believes that it is the CAA's responsibility to determine whether the engagement was satisfactory.

#### 4. Comments on the Draft Design Principles

As stated above we fully endorse the BGA response to this consultation, and with specific reference here to the draft design principles.

For **Draft Design Principle B** we would **wish to see a test of reasonableness included.** Providing "sufficient airspace to meet all technical requirements for the Watchkeeper RPAS platform" is an understandable aspiration for the MOD but opens the door to the covering of every possible eventuality, however unlikely or inconsequential they might be. **Thank you for this feedback. The requirement will be amended to state 'sufficient airspace to meet all reasonable technical requirements for the Watchkeeper RPAS platform that are required to facilitate safe access to SPTA and usage of Keevil'.** It is important to note that future Design Options will be judged against *all* Design Principles. As such as we feel that Design Principle C- 'Minimise the impact to other airspace users, both in terms of activation and volume of airspace required' will offset any unreasonable airspace Design Options.

In **Draft Design Principle D** we propose that the words "endeavour to" should not be used as they soften the requirement unnecessarily. **Thank you for your feedback. We will look to remove the words "endeavour to" from this Design Principle.**

We would suggest a **further design principle that encourages creative solutions to local issues** arising from any use of the proposed airspace. Before the TDA period in summer 2021 MOD staff indicated that a local frequency would be used for a crossing service. In the event, and with no explanation, this turned out not to be the case. This increased the difficulty of obtaining a DACS as the Boscombe Down controllers had limited information of the local situation at Keevil. A locally provided service would have been more knowledgeable and flexible for airspace users. Published data now shows that only 21 live sorties were conducted when the TDA was NOTAMed for many more full days than that. This gives little confidence that the needs of other airspace users were given reasonable weight or priority, or that they would in the future. A more locally managed and controlled solution could have alleviated this. Draft Design Principle E could be employed to work against such flexibility as it dictates the use of standard airspace structures where possible. We propose the following additional design principle. **Employ operational and communication processes that enable timely, flexible and simple access for other airspace users.** On days when the airspace was not required, the NOTAM was cancelled as soon as possible, most often before 1200hrs. A crossing service was provided at all times by Boscombe Zone when Watchkeeper was flying and the airspace was active. On days where this was not possible the airspace was deactivated and Watchkeeper did not fly. Additionally, the airspace was not utilised at the end of July in order to facilitate the Inter-Services Gliding Competition.

The Sponsor supports your suggestion for encouraging creative solution to this local issue and welcomes discussions moving forward to produce simple and flexible operating procedures. However, we believe this is best discussed at a later Stage after the development of different Design Options. We believe it would be unnecessarily restrictive to add this as a Design Principle as we are only able to operate within the current national framework of airspace activation methods and flight information provisions.

## Conclusion

We look forward to an open and transparent process within the terms of CAP1616, in which timely and full consultation will give everyone concerned the confidence that the full interests of all concerned have been considered.

  
For Bath Wilts and North Dorset Gliding Club.

13<sup>th</sup> November 2021

**Please ensure that this response is considered as representing the 120 members of the Club. It is not an individual response and should not be considered as such.** We understand, and this response will be treated as such.

[REDACTED]

**From:** 47RA-Project-LOVERIDGE (MULTIUSER)  
**Sent:** 19 November 2021 12:36  
**To:** [REDACTED] <[REDACTED]>  
**Subject:** RE: Airspace Change Proposal ACP-2021-006

Good afternoon [REDACTED],

Thank you for your feedback and your engagement in this airspace change proposal.

We recognise the issues that you are raising relating to noise pollution. Throughout this process we will continue to engage with local communities to help them to better understand our future intentions, equipment and procedures.

With regards to your specific feedback- we will be adding a Design Principle that ensures noise is factored into the future airspace design options. Most importantly however, we will be reassessing our operating and noise abatement procedures before any potential live flying from the airfield in the future.

If you have any other questions at this stage please do not hesitate to ask and we look forward to future engagement with you as our proposal progresses.

Kind regards,

[REDACTED]

Capt [REDACTED] | Project LOVERIDGE lead | 47<sup>th</sup> Regiment Royal Artillery | Horne Barracks | LARKHILL | Wiltshire | SP4 8QE | Mil: 9214807 2570 | Skype: | MOD<sup>NET</sup> [47RA-Project-LOVERIDGE@mod.gov.uk](mailto:47RA-Project-LOVERIDGE@mod.gov.uk)

**From:** [REDACTED] <[REDACTED]>  
**Sent:** 18 November 2021 17:57  
**To:** 47RA-Project-LOVERIDGE (MULTIUSER) <[47RA-Project-LOVERIDGE@mod.gov.uk](mailto:47RA-Project-LOVERIDGE@mod.gov.uk)>  
**Subject:** Airspace Change Proposal ACP-2021-006

Dear Sir/Madam

I write concerning the above, which relates to Watchkeeper RPAS and the proposal to operate it from Keevil airfield on a more regular basis.

My wife and I are quite concerned about this. We live in Stokes Marsh, a hamlet on the outskirts of Coulston village, which is quite close to Keevil airfield across the fields. During Spring and Summer of 2021 Watchkeeper operated quite frequently and remained in the vicinity of Coulston for many hours at a time, causing us to be affected by the noise nuisance that it created.

In late June 2021 I commenced to log the flights as we were going to complain about the constant noise that was being created. If the noise had been of a temporary nature, say for a few minutes at a time, then we would not be concerned. However, unlike other military activity in the area, particularly aircraft, both large Hercules and various helicopters, which come and go, albeit on a regular basis, this Watchkeeper circled endlessly in the same area for hours. On Tuesday 22<sup>nd</sup> June and Thursday 24<sup>th</sup> June, 2021 the noise was continuous from 1200hrs to 1600hrs both days.

I was informed of the temporary nature of these operations, so stopped logging its activity. Let us be clear, we fully understand the need for such operations and we are not attempting to stop them, we would suggest however that due consideration should be taken of the impact the noise has on local residents, especially during the more pleasant weather when we are more likely to be outdoors (that is not to say the noise cannot be heard whilst indoors).

We were told, via the Parish Council, that there was a need to fly over or near Coulston in order to access the Salisbury Plain Training Area (SPTA), but this was not flying to a location on SPTA, this was a continuous holding pattern circling very close to our property. If the holding pattern were to occur over the Salisbury Plain area, where there are no inhabitants, and the flight path varied, then that may ameliorate the noise to some extent. This was suggested by the local Member of Parliament, Andrew Murrison, in his letter to the Secretary of State, MoD, Ben Wallace MP, dated 6 August, 2021, outlining concerns of local residents.

We feel that a **Design Principle** should be included that considers the noise impact on local residents. This should be about minimising noise for the benefit of such residents.

We look forward to hearing from you with regard to our concerns.

Regards, [REDACTED]

[REDACTED], [REDACTED], Coulston BA13 [REDACTED]



[REDACTED]

**From:** [REDACTED] <[REDACTED]>  
**Sent:** 28 October 2021 11:49  
**To:** [REDACTED] Capt (47RA-RHQ-OpsO) <[REDACTED]>  
**Subject:** RE: Erlestoke Parish contact

Thanks [REDACTED],

As I mentioned to you before, the main concern of the local communities was the noise levels, mainly duration and type of noise. Maybe they could put a silencer on it!

Kind regards

[REDACTED]

Sent from Mail for Windows

**From:** [REDACTED]  
**Sent:** 28 October 2021 11:41  
**To:** [REDACTED]  
**Subject:** RE: Erlestoke Parish contact

Good morning [REDACTED],

Thank you for the details- I have passed on our initial engagement letter, which at this stage focussed more on airspace design principles but I think it is right to start engaging with the local communities.

I look forward to engaging further in due course.

Kind regards,

[REDACTED]

**Capt [REDACTED] RA** | Regimental Operations Officer | 47 Regt RA | Horne Barracks  
| Larkhill | SALISBURY | Wiltshire | SP4 8QE | Mil: 94322 5914 | Civ: [REDACTED] |  
Skype: [REDACTED] | MOD<sup>NET</sup>



**From:** [REDACTED] <[REDACTED]>  
**Sent:** 27 October 2021 20:46

To: [REDACTED] Capt (47RA-RHQ-OpsO) <[REDACTED]>

**Subject:** Erlestoke Parish contact

Hi [REDACTED]

Good to meet you today. The person to contact for Erlestoke magazine and parish council is [REDACTED].

Her email is [REDACTED]

If you want any further information about the gliding operation at Keevil, just drop me a line.

Kind regards

[REDACTED]

Sent from Mail for Windows