



ACP-2021-006 - ENABLING BVLOS UAS OPERATIONS FROM KEEVIL AIRFIELD

STAGE 2 DESIGN OPTIONS FEEDBACK V2

1. This document forms part of the overall submission of Stage 2 of ACP-2021-006 in accordance with the requirements laid out in CAP 1616.
2. Stakeholders were invited to provide feedback of whether they believed the Design Options proposed in the Stage 2A Options Development document were aligned with the Design Principles agreed in Stage 1. Stakeholders were reminded that the size and shape at this stage is only for demonstration purposes and that the analysis should be against the “type” of Design Option proposed and whether that option is aligned with and able to achieve the Design Principles.

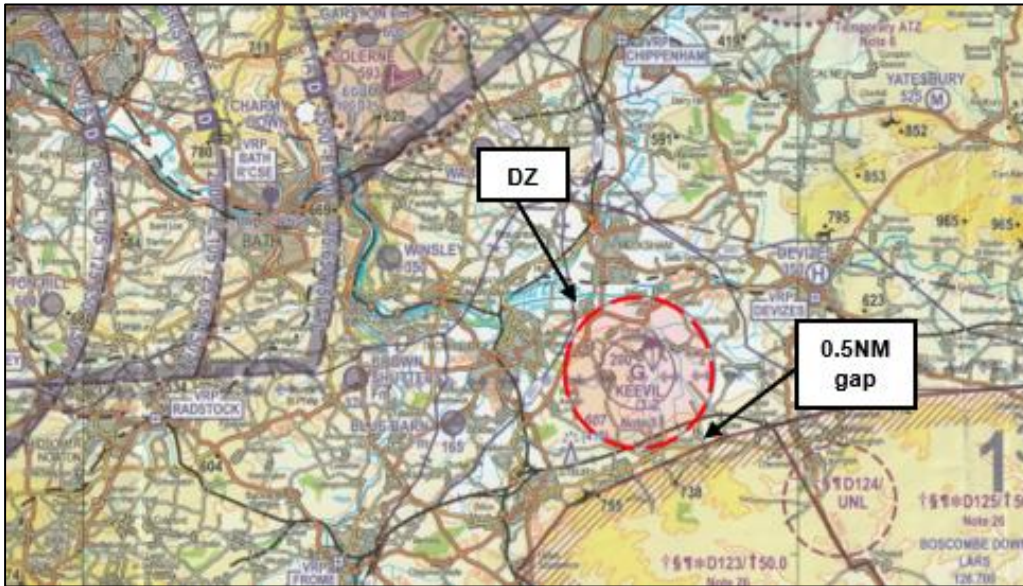
DP	Design Principle
A	Provide a safe environment for all airspace users
B	Provide sufficient airspace to meet all reasonable technical requirements for the Watchkeeper RPAS platform that are required to facilitate safe access to and from SPTA and usage of Keevil Airfield.
C	Minimise the impact to other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

3. The Design Options presented to Stakeholders were:

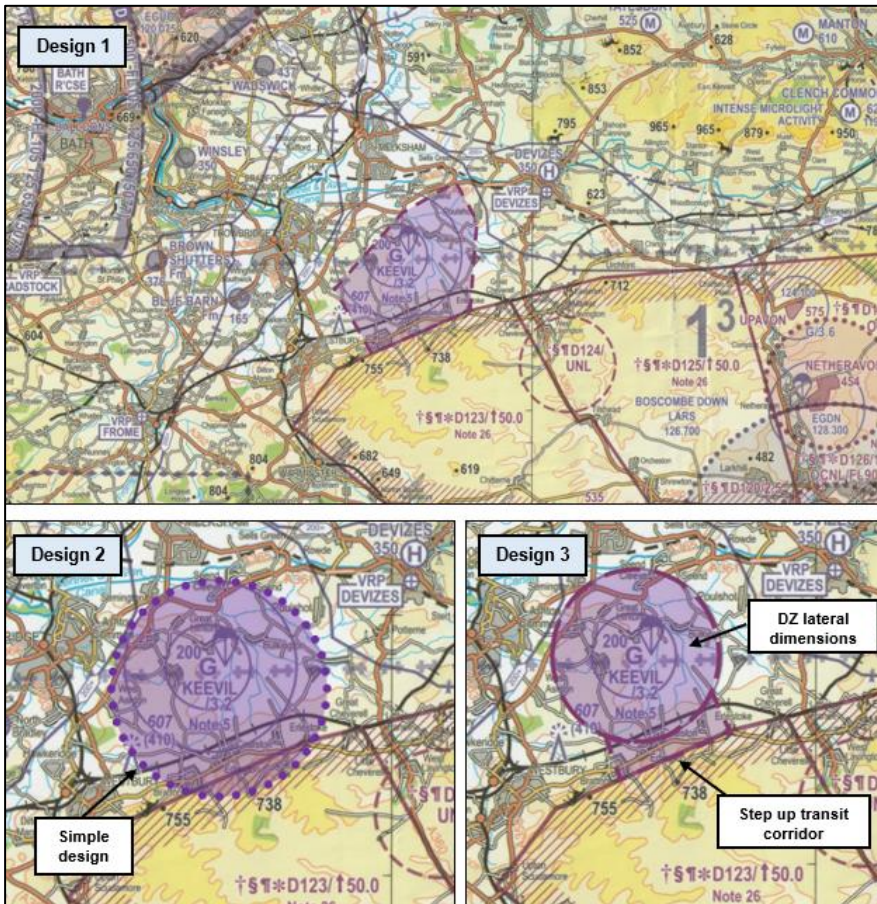
Option 1 – Do Nothing



Option 2 - Use Existing Airspace Structures



Option 3 – Danger Area



4. A prescriptive question set was sent to stakeholders to enable a focused response on the analysis of the Design Options proposed. Stakeholders were further invited within the question set to provide additional feedback.

5. In addition to the online and Microsoft Word feedback form provided, meetings were offered to several stakeholders (Ref. B and C).

Summary

6. A total of 69 stakeholders were identified and engaged with during Stage 2A. Additionally, the MOD consulted internally via DAATM.
7. Out of these a total of 22 responses were received (excluding military responses).

Annexes

- A. Online Feedback Form Responses
- B. Email Feedback Form Responses

References

- A. Stage 2 Engagement Methodology
- B. Meeting Minutes – BGA and Bath, Wilts & North Dorset Gliding Club
- C. Meeting Minutes – Mr [REDACTED]


ONLINE FEEDBACK FORM RESPONSES

Name	Organisation	Which Design Principles are achieved in the Design Options			Which Design Option(s) do you believe best deliver(s) the Design Principles as a whole?	Do you have any specific feedback relating to the use of the Keevil Drop Zone and NOTAMS to achieve an equivalent level of segregation for RPAS?	Do you have any recommendations to the Sponsor or alternative Options you would like the Sponsor to consider at this Stage?	Response from Sponsor
		Option 1	Option 2	Option 3				
█	National Police Air Service	DP - C DP - E	DP - C DP - E	DP - A DP - B DP - D	Option 3 - Danger Area	Any NOTAM should contain contact details for the person/ agency that could authorise (or not) entry by Police aircraft dealing with a police emergency.	A Danger Area with associated DAAAIS/ DACS would be the preferred option for police aircraft, as crews are familiar with the DA structure around Salisbury Plain as well as the methods for gaining info/ entry clearance.	The Sponsor agrees that a communication method to allow aircraft to request information or a crossing service (if appropriate) must be provided to allow pilots safe access to this airspace whilst active. This feedback will feed into the next phase of options appraisal.
Lt █	RNAS Yeovilton			DP - A DP - B DP - C DP - D DP - E DP - F	Option 3 - Danger Area			
Mr █	None			DP - A DP - B DP - C DP - D DP - E DP - F	Option 3 - Danger Area		By selecting Option 3 and Design 3 this does concentrate activity from Keevil to SPTA over a few villages and other houses out with villages, so careful consideration must be made in relation to the amount of time the drone is active over that area, preferably only active to gain access to SPTA.	The Sponsor agrees that different shapes and sizes of the Design Options will result in changes to the level that some Design Principles can be met. More specifically, DP-F (Minimise the impact of operating noise to local residents) will be better met with a larger and higher airspace Design Option, but that it will then consequently negatively impact on other Design Principles. The Sponsor thanks the Stakeholder for their feedback and will specifically address this matter during the Stage 3 consultation process.

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	Wiltshire Air Ambulance Charitable Trust (WAACT)	DP - D DP - C DP - E DP - F	DP - E DP - F DP - C	DP - A DP - B DP - E DP - F	Option 3 – Danger Area	This could work but it would depend of the frequency of use.	I would consider design 2 & 3 the easiest to work with. We would need to have a similar arrangement to last year to achieve rapid transit of the controlled airspace. I do have a concern that the restriction in airspace control around Keevil would have the consequence (unintended or not) of funnelling all GA and military aircraft over the top of our base, as they would no longer be able to transit through the gap between SPTA and Keevil. This could cause a conflict. We would need to see what would be proposed to mitigate this risk?	The Sponsor agrees that a local procedure to allow HEMS safe access during emergencies must be a top priority and will seek to further refine the extant LoA from the TDA in 2021. In addition, the level of the resultant funnelling effect of routing aircraft is a valid concern that the Sponsor will specifically focus on during Stage 3 consultation, in order to develop the best possible design option. Additionally, the use of quantitative data will aim to demonstrate current aircraft routings in the area.

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	Self	DP - F	DP - F	DP - F	Option 2 - Use Existing Airspace Structures	<p>The area of Westbury White horse is so active for model flying drone flying and parachute paragliding users that are often not very well trained and likely to stray in and around this area especially when paragliders are thermalling in a congested airspace where they are coming to gain altitude. To expect airspace incursions not to happen here is wishful thinking on the part of the MOD. To close off the south corridor completely so the railway line can no longer be used as a visual aid to GA Pilots is short sighted.</p>	<p>You will have regular and very uncertain encounters from not very well trained paraglider and drone and model pilots who will be flying from the top of the Westbury White horse area. These designs have now penned them into such a narrow area that you are literally asking for incidents to happen, many of which will go unreported and cause a major risk to damaging the UAV Watchkeeper aircraft and killing paragliders or downing drones. I would suggest a complete rethink of keeping a southern corridor open above the railway line, but seeing as the MOD are clearly already cynical about their own ability to operate taking off from Keevil and to get safely into the Salisbury Plain Danger area without them encountering other air users one can see why they have blocked this whole area off. My strong suggestion is that you look at the idea of creating your entry corridor to the plain more as a block to the South East of where it is now and that would centre just this joining block over the prison area because this would minimise the risk to encountering other less trained air users in the Westbury Horse area. If this is not possible then I would suggest if deciding to stick with the current proposal that even though this would give the ability to use the South Westerly end of the TDA, that the Watchkeepers DO NOT ATTEMPT to fly there and use the SOUTH EAST</p>	<p>The Sponsor thanks the Stakeholder for the very comprehensive analysis of the Option and their possible impact on a number of air users. The Sponsor agrees with the possibility of airspace incursions due to the amount of users in the area and have therefore included the DP-A (Provide a safe environment for all airspace users) to assess the Options and further develop during the Stage 3 consultation.</p> <p>The Sponsor would like the stakeholder to note that the MOD is not cynical about the ability of other air users and the impact on transit of its RPAS to and from Keevil- it is a regulatory requirement to provide</p> <p>The Sponsor would greatly value further engagement from the Stakeholder throughout and more specifically during Stage 3 to further refine Design Options.</p>

							area as much as possible to minimise the risk.	
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	Keevil Resident	DP - A DP - C DP - D DP - E	DP - A DP - B DP - D DP - C DP - E	DP - A DP - B DP - D	Option 2 - Use Existing Airspace Structures	<p>We would assume Option 2 to make a link to the DZ and the Danger Area Boundary would be the compromise ensuring the link misses main village properties.</p> <p>Obviously doing nothing would be the best option and not supporting the location of the RPAS at Keevil, but we cannot see that happening (during lockdown and the increased helicopter traffic we get a short curt letter from Brize Norton when we questioned items 1 - 4 below, basically saying they could do what they wanted when they wanted)</p> <p>The main concerns for Option 2 would be:</p> <ol style="list-style-type: none"> 1. Frequency of flights 2. Hours of operation 3. Days of operation 4. Direction of takeoff and landing 5. Increases in road traffic and routes <p>It was noticeable noisier when the trials were taking place.</p>	<p>During lockdown and with many airports being closed the helicopter traffic increased proportionally at Keevil. There appeared to be no adherence to flight paths (if any existed) in and out of Keevil, to avoid flying over the village.</p>	<p>The Sponsor thanks the Stakeholder for the feedback.</p> <p>The concerns raised will specifically be considered during the Stage 3 consultation, which runs for 3 months, in order to allow comprehensive analysis of the impact and opportunity to develop mitigations for local residents.</p> <p>The operation of helicopters from Keevil during lockdown is not relevant to this ACP.</p>

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	Coulston Parish Council	DP - F DP - A DP - C DP - D DP - E	DP - E DP - D DP - A DP - B DP - C	DP - A DP - B DP - C DP - D DP - E		<p>Option 1 is not considered to meet the Statement of Need; however it is the only Option that delivers Design Principle F.</p> <p>Options 2 and 3 do not refer to Design Principle F at all, and the lack of analysis of the impact of operating noise on residents means that the ACP document does not meet the requirements of CAP 1616 Stage 2 for 2 reasons:</p> <p>(a) The Sponsor is obliged to show that the Options address the Design Principles agreed in Stage 1, and the ACP document fails to do this in relation to Design Principle F.</p> <p>(b) The Options are required to be tested with the stakeholders to ensure they are satisfied that the Design Options are aligned with all the Design Principles. Stakeholders cannot test the Options against Design Principle F because no information has been provided on which to make a judgement. Nor can stakeholders make any meaningful comparisons between the different airspace configurations presented in Option 3.</p> <p>Until/unless there is information or an explanation to the contrary, we have to assume that Options 2 and 3 will not deliver Design principle F.</p> <p>We recommend that the ACP document is amended to include analysis that addresses Design Principle F as CAP 1616 requires.</p>	<p>The Sponsor thanks the Stakeholder for their feedback and objective analysis of the Design Options.</p> <p>At this stage, it is important to assess whether a Design Option can achieve the Design Principles agreed in Stage 1.</p> <p>The Sponsor believes that Design Principle F (minimise the impact of operating noise to local residents) can be met to varying degrees by increasing the size or altitude of the Design Options as an example. However, at this stage the airspace designs were illustrative only.</p> <p>Impact analysis (including noise impact assessments) will be considered during the Stage 2B Initial Options Appraisal and Environmental Impact Assessments as mandated by CAP1616 Annex E therefore we disagree that the ACP does not meet the Stage 2 requirements. The Sponsor believes that the stakeholder may have reviewed the <i>final</i> requirements of Stage 2 and incorrectly assumed all those requirements to have been reflected in the Stage 2A Engagement documentation sent to Stakeholders.</p> <p>The Sponsor would like to confirm that Stage 2 is not fully completed yet, and that more supporting documents will contain the required information stipulated in CAP1616 for the CAA to assess.</p>	

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(as representative of the BGA)	Representing multiple gliding clubs in the region	DP – A DP – C DP – D DP – E DP - F	DP – B DP - F	DP - A DP – B DP - E DP - F	Option 3 – Danger Area	<p>This option as proposed appears to have some attractions but we doubt that it is likely to be acceptable to the authorities in the short to medium term. It is our understanding that Watchkeeper activities would only be permitted in any location protected by DA status. It is therefore not seen as a serious contender unless the sponsor has some view on how it could be considered in the short to medium term.</p> <p>Specifically, activation of the DZ raises the risk of GA funnelling between it and the SPTA, the gap being very narrow so the risk high.</p>	<p>This response is submitted as the formal response of the British Gliding Association (BGA). Gliding Clubs in southern England and local to Keevil airfield have their views represented in this single BGA response. They will respond with their individual positions in the wider consultation phases to follow.</p> <p>In responding as we have we are not agreeing that any of the options as proposed fully meet the needs of glider pilots in the area. They do, in our opinion, meet the design principles to varying degrees. Our response expresses our view that if Watchkeeper is to be based at Keevil under current rules, use of the DA construct is the least disruptive outcome for us. This is based on our current understanding of the rules governing the operation of drone aircraft. Should there be an innovative way of using your option 2 then we would be keen to enter into discussion on how it might work for all parties.</p>	<p>The Sponsor thanks the Stakeholder for their feedback representing multiple clubs.</p> <p>The sponsor also appreciates the stakeholders' view that some Design Options meet the Design Principles (to varying degrees) and that a DA construct is the least disruptive for gliders.</p> <p>On your feedback on creating 'cul-de-sacs' that gliders may become caught in. These concerns will be further discussed once designs have been further developed in the coming Stage and welcome a continued dialogue with the BGA in order to develop airspace designs that minimise impact to all air users.</p> <p>The feedback on simple structures (Design Principle E) is noted and will be carried to the next stage. Additionally, activation times are not a consideration for Stage 2 but will be discussed at a later stage.</p>

						<p>Were the operational area to be limited to that of the ATZ the risk to others would be lower, but it is unclear to us whether Watchkeeper could be constrained within the ATZ for local testing purposes.</p> <p>The risks during Watchkeeper crossings to and from the SPTA, from whichever local structure were used, would be an area for concern. In principle we would prefer that this gap remained normally open and closed only for short periods to facilitate Watchkeeper crossings, but that would require clear and reliable communications for all airspace users to minimise risk.</p>	<p>Our strong preference is for structures that are simple to understand and navigate, and that do not create cul-de-sacs where aircraft can become caught and need to backtrack to escape. Alignment with ground features is always helpful.</p> <p>Activation times and durations need to be clear, simple and easy to understand, and easily communicated.</p> <p>We would also welcome consideration of structures that enable local operation of Watchkeeper within a very localised area around Keevil, so permitting co-incident use of the gap between Keevil and SPTA by other aircraft. The connection to SPTA could then be enabled as needed to facilitate Watchkeeper transits, with appropriate communications and protections in place.</p> <p>The TDA exercise in mid 2021 was characterised by long periods of DA activation when it did not appear to us to be used or needed. Specifically our concern was its continued activation when the Watchkeeper was not actively using the airspace but in flight over the SPTA. We would support any operational changes that would minimise such prolonged activity.</p>	
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		Option 1	Option 2	Option 3				
	GA Pilot	DP - A			Option 1 - Do Nothing		<p>First of all, this 'engagement' is completely contrary to the requirements of CAP1616 because stakeholders are given less than 2 weeks to comment on the Principles - publish date 21 Jan, end date 2 Feb; this is entirely unacceptable. In addition the proposal is incomplete in that it proposes a permanent DA at Keevil AND mentions either an RPAS corridor or an extension N of D213, yet neither of these are included in the Proposal for stakeholders to consider. In principle I believe the MoD has more than enough segregated airspace for its use without taking any more, no matter how small.</p> <p>There are airfields available inside D213 and while the MoD might argue - without providing evidence - that they are not suitable that cannot be true of Boscombe Down; otherwise build a new strip inside D213. No consideration seems to have been given to operating the RPAS EVLOS for the short journey from Keevil (if that is where it must be based) to D213.</p> <p>After all, this airspace is - using the MoD's own words - "The local airspace is popular with General Aviation (GA) traffic and it is used frequently by aircraft routing around the SPTA Danger Areas and the Bristol Control Area (Class D)"; creating a choke point is unacceptable. Any of the Proposals other than 'Do Nothing' will do nothing to provide a safe environment for air traffic.</p>	<p>The engagement will be justified to the CAA in a separate document to ensure it was proportionate to what is required at Stage 2.</p> <p>At this stage the Design Options are not fully developed and refinement will continue in the coming stages therefore the Sponsor agrees that the proposal is not yet fully complete. The 'corridor' and DA options were separate design options to discuss.</p> <p>The sizes and shapes of the proposed Design Options are only for demonstration purposes to allow stakeholder to consider how different types of a Design Option can achieve a set Design Principle. The focus at this stage was whether a Design Option is aligned with and able to achieve the Design Principles and not a fully developed 'lines on a chart' solution.</p> <p>EVLOS is only allowed with certain type of operations and classifications of aircraft as per CAP 722. The use of EVLOS is not possible for our purposes and is therefore excluded from the options.</p> <p>With regards to creating a 'choke point' - this will be assessed during Stage 3 when the Sponsor aims to gather data on air traffic in order to conduct a quantitative study to determine how a new airspace structure might affect the funnelling effect.</p> <p>The Sponsor thanks the Stakeholder for their comment and wish to continue discussion throughout the ACP.</p>

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█	Private Pilot	DP – A DP – B DP – C DP – D DP – E DP - F			Option 1 - Do Nothing Option 2 - Use Existing Airspace Structures		Upavon and Netheravon should be consider as these are already in the danger zone and active airfield.	Use of alternative airfields do not meet the Sponsor's Statement Of Need. This will be discussed in more detail during the Stage 3 Consultation. The Sponsor thanks the Stakeholder for their assessment and will continue engagement throughout the ACP.

EMAIL FEEDBACK EMAIL RESPONSES

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[REDACTED]	Edington Hill Airstrip	DP - F	DP - C DP - D DP - E	DP - A DP - B DP - C DP - D DP - E	Option 3 - Danger Area	<p>I farm the land between the villages of Bratton and Edington and I am the only private land owner on the Northern edge of the Salisbury Plain Training Area. I own the airstrip at Edington Hill Barn N51 16 04 W002 06 08 situated 3 nm South of Keevil Airfield. My logbook shows my first movement into my strip was in November 1995. I am one of the 400 plus members of the Flying Farmers Association (ffa.org.uk) and a member of AOPA. My airstrip is also registered with the Border Force at Bristol enabling me to acquire customs clearance at my strip on direct flights in from outside the UK. There are two resident aircraft that operate from my strip, one</p>	<p>I attach the maps that Mr [REDACTED] submitted plus my airstrip details from my FFA membership profile.</p> <p>To facilitate movements into Edington Hill Airstrip and the safe passage of GA aircraft along the Pewsey Vale I support Option 3 Design 3 with the step being a minimum of 1500 ASML which should give a safe clearance for transiting aircraft.</p> <p>Working Environment Noise Pollution. If Watchkeeper is to be a permanent fixture at Keevil Airfield could I suggest that the noise level be attended to. Last summer Watchkeeper spent a considerable amount of time doing circuits to the South of Keevil and the sound is particularly unpleasant, something between a strangled cat or lawn mower.!! Please fit a</p>	<p>The Sponsor thanks the Stakeholder for the feedback and also for the route diagram of their departure and arrival procedures at the airstrip.</p> <p>This will be particularly important in the next stage of this proposal when we look to develop our procedures so that we can best integrate with local air users and minimise disruption. The Sponsor would like to continue close links throughout the ACP and arrange further meetings in person.</p>

					<p>owned by myself and one by Mr [REDACTED].</p> <p>Although my airstrip is on private land the airspace above is controlled by Air Ops at SPTA and I therefore operate under a letter of agreement with them. It is for this reason that the location of the airstrip is not in the public domain. We operate mostly at weekends when Air Ops are closed but occasionally on weekdays when movements are pre-booked with Air Ops.</p> <p>My experience with the Watchkeeper trials last summer were similar to [REDACTED] in that planning flight movements with the team at Keevil and Air Ops was straight forward. The problems arose on recovering to Edington Hill while Watchkeeper was operational with Boscombe Down LARS being only programmed to provide a crossing service, did not know we existed and couldn't advise outside their remit.</p>	<p>better exhaust silencer or quiet propeller.</p>	
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	Private Pilot at Edington Hill (D123)	DP – F	DP – C DP – D DP – E	DP – A DP – B DP – C DP – D DP – E	Option 3 - Danger Area	<p>I have experience of flying from Edington Hill farm strip, just inside the north edge of D123, while the trials of Watchkeeper flying from Keevil were in progress during 2021. In the main the integration of the RPAS with the few weekday flights that we took from Edington Hill worked very well. Not only did we book a slot with Salisbury Ops as per our letter of agreement, but also liaised with operations at Keevil via the telephone on the morning of the flight, so that we could avoid a departure while the drone was in transit to and from the danger area and that the operations at Keevil knew that we were also operational that day. The problems that we faced was on our return for recovery to Edington Hill farm strip. As per briefing and procedures radio contact was made with Salisbury Ops for permission to enter D123 for recovery into Edington Hill , and after an update of events in progress on the northern edge of D123 at that time, agree the circuit pattern and height that we would use. We then requested a change of frequency to Boscombe Down 126.700Mhz so that we could state our intent and to also liaise with RPAS at Keevil. At this point the controllers at Boscombe Down seemed to have no knowledge that Edington Hill farm strip existed, nor that we had agreements and procedures in place that we were following. Thus they were only willing to give us transit through the NOTAM while the Drone was on</p>	<p>I attach a map that highlights the position of Edington Hill farm strip in relation to the danger area and the proposed Airspace Change Proposal. I have also highlighted the route in and out of our strip that we used while the trials were in progress last year, which includes the voluntary height restriction that we agreed with Salisbury Ops while requesting our recovery and entry into D123 via the radio on 122.750 Mhz. I hope that these points can be taken into consideration while your proposal is drawn up and that you have every success with your design which includes the integration of Edington Hill.</p>	<p>The Sponsor thanks the Stakeholder for the feedback and also for the route diagram of their departure and arrival procedures at the airstrip.</p> <p>This will be particularly important in the next stage of this proposal when we look to develop our procedures so that we can best integrate with local air users and minimise disruption. The Sponsor would like to continue close links throughout the ACP and arrange further meetings in person.</p>

						<p>manoeuvres, rather than recovery into Edington Hill. Total confusion arose at this point and jeopardised the safety of our recovery into Edington Hill, as more time was taken up trying to explain our agreements and the procedures that we were following, rather than monitoring the drone on our ADSB in device and maintaining our height and a good lookout whilst on approach. I feel that our agreements and procedures need to be highlighted to the controllers at Boscombe Down so that they are able to minimise the impact to ALL other airspace users and fulfil the integration of pilots recovering into Edington Hill farm strip with the RPAS operations .</p>		
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	Bristol Airport				<p>1. No rationale for the proposed vertical limit of 3,500ft for the DZ option has been given.</p> <p>2. No vertical limits for the DA options have been proposed nor rationale explained.</p> <p>3. No rationale is given for the lateral boundaries of the DZ or DA options proposed.</p> <p>4. No indication is provided on the expected timings of segregated airspace.</p> <p>5. No information is provided on any opportunities for tactical access/crossing of segregated airspace.</p> <p>6. The Bristol ACP currently in progress (at the Stage 2 gateway) will be developing proposals for extending the south-eastern part of its CTAs to provide regulatory containment for RNAV approaches to runway 27. This initiative is required by the Airspace Modernisation Strategy and forms part of the FASI-S programme. Restricting access to current Class G airspace in the vicinity of Keevil will further reduce the width of unregulated airspace between Bristol and Salisbury Plain. This is a current concern to GA on the basis of traffic congestion and therefore safety.</p>	<p>1. Has a survey of transit traffic (military and GA) been conducted to understand the extent of disruption this proposal will need to mitigate?</p> <p>2. Providing safe operations without needing segregated airspace should be explored e.g. Control Zone with ATC/crossing service. Although a DA crossing service is mentioned there are no reasons provided to back up the assertion that such traditional structures were "deemed unsuitable".</p> <p>3. If segregated operations from Keevil are unavoidable they should extend to the absolute minimum required, and especially to the West and North.</p> <p>4. It seems wasteful that there are no opportunities to contain the proposed RPAS operations entirely within the Salisbury Plain complex. Whilst it is understood that classification hinders the provision of this full analysis, it would be advantageous for stakeholders to understand the generic rationale as to why this option is not suitable e.g. safety with conflicting operations, financial requirement for provision of hard standing, etc.</p>	<p>The sizes and Shapes of the proposed Design Options are only for demonstration purposes to allow Stakeholder to consider how different shapes of a Design Option can achieve a set Design Principle.</p> <p>The focus at this stage was whether a Design Option is aligned with and able to achieve the Design Principles.</p> <p>Rationale for lateral and vertical limits is not to be discussed at this stage- Stage 2 does not create 'lines on a chart' but seeks feedback on the type of Design Option and there adherence to Design Principles.</p> <p>A 'survey' has been conducted with local air users and feedback received, particularly regarding the funnelling and use of land features for VFR navigation. However, this will be discussed at a later stage.</p> <p>The Sponsor thanks the stakeholder for their comments and wish to continue discussion throughout the ACP and reminds Bristol that the <u>Keevil ACP team in the MOD wish to become stakeholders for their ACP.</u></p>	

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	Army Gliding Club (Wyvern)	DP – C DP – D DP – E DP – F	DP – A DP – B DP – E DP – F	DP – A DP – B DP – E DP – F	Option 3 - Danger Area	<p>1. What periods will the Danger Area be activated, 24/7/365, or free at weekends & Bank Holidays.</p> <p>2. Method of activation and notification of the Danger Area, how much notice?</p> <p>3. Availability of DA crossing service, supposedly for Phase 1 but not implemented?</p> <p>4. The reduction in the SPTA/Bristol gap is significant and should be kept to a minimum.</p> <p>5. Availability of the Danger Area during gliding competitions that are likely to task into the area.</p>	<p>1. All options are based on using existing 'controlled' airspace (Drop Zone) that is already defined and available. What volume of airspace does the RPAS actually need, what is required and in what orientation to recover RPAS. It would be the ALARP option to determine the least practicable airspace required for safety, rather than just claiming the existing airspace.</p> <p>2. Possible for Option 3 to have the more open airspace to the NW that Option 1 has?</p>	<p>The sizes and Shapes of the proposed Design Options are only for demonstration purposes to allow Stakeholder to consider how different shapes of a Design Option can achieve a set Design Principle. The focus at this stage was whether a Design Option is aligned with and able to achieve the Design Principles.</p> <p>Types of services, operating times and crossing procedures are all procedures that stem from the chosen Design Options, and not the focus of this stage. This will be discussed and developed in Stage 3 consultation, in order to best achieve the Design Principles.</p> <p>The Sponsor thanks the Stakeholder for their feedback and will remain in contact throughout this ACP.</p>

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	SPTA Air Ops	DP – C DP – D DP – F	DP – A DP - B DP – C DP – D DP – E DP – F	DP – A DP - B DP – D DP – E DP – F	Option 3 - Danger Area		<p>SPTA Air ops preferred option would be Option 3 and Design 3; the option used when Keevil was a TDA for Watchkeeper. Design 1 is acceptable; however Design 2 infringes EGD 123 which is managed by Air Ops and no reference to another agency is acceptable to Air Ops for flying in this area.</p> <p>SPTA Air Ops cannot provide a DACS so any Option would need to include the Agency responsible for crossing the Keevil DA or the low level transit between Keevil and EGD123. Design 3 allows the “corridor” to be activated when required and not necessarily for the duration of the sortie thus allowing access to the low level transit for other traffic. This will also keep the area free when Watchkeeper is only flying in the Keevil circuit and not using EGD123.</p>	The Sponsor thanks the Stakeholder for their feedback and will continue discussion throughout this ACP.

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[REDACTED]	BMAA Airspace Team, BMAA CEO	DP – A DP – B (#1 &2) DP – C DP – D DP – E DP – F			<p>The lack of justification for being unable to use the 3 existing airfields within the existing SPTA needs to be examined independently. This should also be provided to the CAA as a matter of course, not 'as required'. Areas of under-used airspace should revert to Class G and any expansion of segregated airspace should only happen where existing areas cannot justifiably be used.</p> <p>Using Keevil will likely involve expanding the existing segregated area. It has been shown in other locations (see Cotswold Region Airspace Classification Review) that using NOTAMS to activate at specified times has lead to other airspace users avoiding the area at all times due to uncertainty</p>	<p>Yes, the MoD as a whole should look more seriously at using 1, or a combination, of the 3 existing airfields within the SPTA. Not why you can't but what needs to be done so you can. Its unbelievable to the whole of the GA community why, out of 3 airfields, especially including Boscombe Down, this cannot be achieved and that you need to create more segregated airspace in this day and age.</p> <p>How much land does Watchkeeper need? Surely somewhere within the SPTA area space could be found for a dedicated launch and recovery space, if some area on those 3 existing airfields absolutely be found.</p> <p>Additional Notes from Stakeholder:</p> <p>#1- What about considering EVLOS, where visual surveillance is posted in the area between Keevil ATZ and SPTA when a drone is being positioned?</p> <p>#2- Insufficient options are being put forward at this stage. Excluding use of one or a combination of the 3 existing airfields within the SPTA is not understood nor justified to stakeholders. This should remain an option and the requirements to</p>	<p>The Sponsor believes that during Stage 2A the focus intended in CAP1616 was whether specific Design Options are aligned with and able to achieve the Design Principles in the chosen area that the Sponsor has assessed it requires within its SoN. The Sponsor felt that communicating to Stakeholders the details as to why other locations have been discounted will invoke discussion into a topic which is set to be discussed in later stages although of interest to stakeholders, not relevant at this stage and detract the attention from the question at hand – the assessment of Design Principles against the Design Options. The detailed reasoning for discounting other locations may be declared to the CAA and (as much as classification allows) may be discussed with stakeholders in the Stage 3 consultation.</p> <p>EVLOS is unfortunately only allowed with certain classes of RPAS (see CAP 722). The use of EVLOS is not possible for our purposes and is therefore excluded from the Options.</p> <p>The Sponsor thanks the Stakeholder for their comment and wish to continue discussion throughout the ACP.</p>	

						of whether an area COULD be active.	enable that should be exhausted before creating safety risks to other airspace users.	
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	NATS	DP – C DP – D DP – E DP-F N/A	DP – ? DP - ? DP – ? DP – D DP – ? DP-F N/A	DP – A DP - B DP – D DP – E DP-F N/A	Option 2 - ? Option 3 - Danger Area	<p>We note that this is a radical option which could provide the necessary flexibility and protection for the RPAS operations while minimising the need for new airspace structures. However, we are not clear whether it would actually be an acceptable use of the Drop Zone structure, hence the ?s in our answers to questions 1 and 2.</p> <p>If this option is to be taken forward, it will be imperative that there is absolute clarity for all relevant aviation stakeholders about when the DZ is only activated to ~3000ft (as indicated in the Assessment Meeting presentation) for RPAS use and when it is activated to FL150 for parachute dropping. (We would not currently expect RPAS operations between SFC and 3000ft AMSL in this location to have any impact on civil en route operations, but SFC to FL150 might.)</p> <p>Additionally, it is unclear from the Stage 2A document what type of airspace structure the proposed 'RPAS' crossing corridor' would be. We presume this will be clarified at Stage 3 as at present we cannot take a definitive view on it.</p>	<p>We recommend MOD obtains clarity from CAA on the legal/regulatory viability and wider aviation stakeholder community acceptability of using a Drop Zone for this purpose before fully developing this option. (We appreciate that this might require CAA undertaking some form of wider consultation before responding to MOD.)</p>	<p>The Sponsor thanks the Stakeholder for their comprehensive feedback and agrees that the use of a DZ could offer protection for RPAS operations.</p> <p>The Sponsor agrees that engagement with the CAA to confirm the viability of the use of a DZ for RPAS operations is required in order to allow development of this option.</p> <p>The Transit corridor type may be an extension of the DA D123, as one option, and this along with the activation of the DZ for RPAS operations will be further discussed with Stakeholders during Stage 3.</p>