

ACP-2021-006

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

STAGE 3A

CONSULTATION STRATEGY

V1



**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 47th Regiment Royal Artillery.

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

Revision Number	Affected Part	Revised By	Notes
Initial Issue 0.1		Project LOVERIDGE lead	
V0.2	Whole document	Project LOVERIDGE lead	All parts in red
V1	Whole document	Project LOVERIDGE lead	Additional amendments post-Gateway

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Introduction

0.1 This document forms part of Stage 3 of the Airspace Change Proposal ACP-2021-006, which seeks to enable Beyond Visual Line of Sight (BVLOS) take-off and landing of Remotely Piloted Air System (RPAS) from Keevil Airfield, Wiltshire in order to operate within the extant Danger Area complex over Salisbury Plain Training Area.

0.2 The CAA accepted the Sponsors' submission at the Stage 2 'DEVELOP AND ASSESS' Gateway on 25th February 2022 and redacted versions of all submission documentation can be found on the Portal¹.

0.3 The aim of this document is to demonstrate to the CAA a comprehensive consultation strategy that satisfies the requirement for detailed consultation as part of Stage 3 of the CAP 1616 airspace change process. This consultation strategy forms part of a wider submission that will be sent to the CAA in time for the Stage 3 'CONSULT' Gateway that is planned for 29th April 2022.

0.4 CAP 1616 provides 'best practice consultation principles'² and a foundation format for this document. It will include the following chapters:

- **Summary of engagement activity undertaken to date.** This section will summarise all engagement that has been conducted throughout Stage 1 and 2.
- **Audience.** This will outline the stakeholders already identified based on their impact (either positive or negative) or perceived interest in the proposal.
- **Approach.** This will detail the methods the Sponsor will use to inform stakeholders and provide a timeline of consultation activities. It will also outline how the Sponsor will contingency plan for unexpected events.
- **Materials.** This will detail what products will be created to enable stakeholders to provide informed responses. Specifically, it will outline the different materials that are to be developed in order to make the information as assessable to a range of audiences.
- **Length.** This section will propose the start and end of the consultation period.

Objectives

0.5 The objectives of this consultation strategy will be primarily guided by the Gunning Principles. The Gunning Principles are principles that set out the legal expectations surrounding formal consultation. The Cabinet Office Consultation Principles 2018 will also feed into the approach and materials used for this strategy.

0.6 The four Gunning Principles for effective consultation are:

¹ <https://airspacechange.caa.co.uk/PublicProposalArea?pID=341>

² CAP 1616 Appendix C, Table C1

1. Consultation should occur when proposals are at a formative stage
2. The consultation should give sufficient reasons for any proposal to permit intelligent consideration
3. The consultation should allow adequate time for consideration and response
4. The product of consultation must be conscientiously taken into account.³

0.7 The Sponsor is seeking to meet all of these principles when developing the consultation strategy. The MOD is seeking to maintain a dialogue with all stakeholders identified to date whilst ensuring that any new stakeholders are able to fully understand the proposal in order to ensure meaningful feedback is gathered.

0.8 The following high-level objectives will underpin the development of the consultation strategy:

1. Material must be as accessible as possible for all types of stakeholder. This includes different types of material as well as different methods of delivery and dissemination (physical or virtual).
2. Information is presented in a jargon-free way and is accessible to both aviation professionals and the general public alike.
3. Consultation is long enough to ensure that all stakeholders have had a chance to respond. This is particularly pertinent for organisations who may meet irregularly and will not be able to respond quickly.

0.9 These principles will ensure that consultation is thorough, reaches the correct audience and employs the correct methods of consultation to generate valuable contributions that will aid in the development of the proposal.

0.10 Additionally, the Sponsor has used the most up-to-date and credible data available within the consultation documentation. This includes open source electronic conspicuity data⁴ and the latest CAA aeronautical charts.

³ CAP 1616 p181 para C31

⁴ See Ref C for details

Summary of Engagement Activity Undertaken to Date

0.11 Engagement has been undertaken throughout Stage 1 and 2 of this ACP. The table below summarises the activity to date. Each document referenced can be found by clicking on the appropriate hyperlink:

ACP Stage	Engagement Activity Summary
1A	A STATEMENT OF NEED (SoN) was submitted to the CAA and uploaded to the Portal. The SoN articulates the requirement to facilitate BVLOS RPAS operation from Keevil and was repeated on documents in Stage 2 to ensure any new stakeholders were made aware.
	The minutes of the ASSESSMENT MEETING between the Sponsor and the CAA were uploaded to the Portal. The assessment meeting is to allow the Sponsor and CAA to discuss the SoN and consider whether or not the proposal falls within the CAP 1616 formal airspace change process.
1B	<p>Stage 1B saw the Sponsor propose and then engage on a set of DESIGN PRINCIPLES (DPs). The purpose of the DPs are to agree a criteria that airspace design options must be judged against. The draft DPs were sent to stakeholders and feedback sought.</p> <p>A total of 16 responses were received. As a result of feedback two DPs were modified and one other added.</p>
2A	<p>Stage 2A saw the development and assessment of several airspace change options. Engagement was sought on the initial options in the OPTIONS DEVELOPMENT documentation which was sent to stakeholders for comment. An ENGAGEMENT METHODOLOGY document was also included outlining the engagement methods, stakeholder identification and justification for a proportional engagement period.</p> <p>A total of 22 responses were received.</p>
	As part of Stage 2 several meetings were held between the Sponsor and various stakeholders including a virtual meeting with the British Gliding Association and a face-to-face meeting with a local GA pilot.
	Additionally, all options developed were then qualitatively assessed in the DESIGN PRINCIPLE EVALUATION which was uploaded to the Portal before commencement of Stage 2B.
2B	As part of Stage 2B the Sponsor compiled a document set that formed part of the INITIAL OPTIONS APPRAISAL . This included an Environmental Assessment and Safety Assessment. This appraisal then assessed the different airspace options against a baseline ‘do nothing’ situation and outlined the relative differences in impact on each option (both positive and negative).

Section 1 - Audience

1.1 A comprehensive list of stakeholders were identified at Stage 1 of the ACP. As the ACP has progressed a number of other aviation and local community stakeholders have been added. The Sponsor intends to conduct consultation primarily with this set of stakeholders. This list is the most up-to-date available and has been expanded at each stage as new stakeholders have been identified.

1.2 Additionally, the Sponsor will conduct wider consultation with the general public, principally through the use of Citizen Space and the CAA Airspace Change Portal as well as physical roadshows. Further detail can be found in Section 2.

1.3 Stakeholders have been broken down into the following groups below:

1.3.1 NATMAC. NATMAC ‘assists the Safety and Airspace Regulation Group (SARG) in the development of airspace policies, configurations and procedures in order that due attention is given to the diverse requirements of all users of United Kingdom airspace, civil and military’. As a non-statutory advisory body sponsored by SARG, the National Air Traffic Management Committee will be consulted in order for views at a national level to be captured. Additionally, 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.

NATMAC Stakeholders		
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)

1.3.2 Local Aviation Stakeholders. 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 aviation stakeholders were also asked to recommend further aviation stakeholders that they believed would be affected by this ACP or have an interest in its development.

Local Aviation Stakeholders		
Avon Hang Gliding and Paragliding Club	Dorset and Somerset Air Ambulance	Rivar Hall Gliding Site / Shalbourne Gliding
Bath, Wilts and North Dorset Gliding Club	Draycot Aerodrome, Swindon	██████████ – SATCO Bristol Airport
Bowerchalke Airfield	HeliAir Thruyton	██████████ – GA pilot
Bristol Airport	Henstridge Airfield	Wadswick Airfield
Bristol and Gloucestershire Gliding Club	Kemble (Cotswold) Airport	Wessex Model Flying Club
Brown Shutters Farm Airfield	Lydeaway Field, Devizes	Western Air (Thruyton) / Vantage Aviation
Charlton Park Airfield	Manor Farm Airfield, Pewsey	White Ox Mead Airfield
Clench Common Microlight Site	Membury Airfield	Wiltshire Air Ambulance
Compton Abbas Airfield	██████████ – Edington Hill Airstrip	Wing Farm Microlight Site
Cotswold Gliding Club	██████████ – GA pilot	Yatesbury Microlight Site
Devizes (Coate) Airfield	Oaksey Park Airfield	
Devizes (Urchfont) Airfield	██████████ – Edington Hill Airstrip	

1.3.3 Local Area Stakeholders. 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 engagement from the Temporary Danger Area of Spring 2021⁵. Local environmental stakeholders were added after feedback from Stage 1. Additionally, local MP engagement has commenced formally through the MOD via a ministerial submission informing three local MPs.

It is anticipated that this stakeholder group will be widely extended during consultation as a result of the direct methods of consultation that are planned.

Local Area Stakeholders		
Aviation Environment Federation	Friends of Steeple Ashton	██████████ – local Coulston resident
██████████ – Councillor for Melksham Without West & Rural	Keevil Parish Council	Wiltshire County Council Environmental Health

⁵ ACP-2020-047

Coulston Parish Council	Natural England	
Edington Parish Council	Steeple Ashton Parish Council	

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

MOD Stakeholders (*via DAATM)		
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)	

1.3.5 Members of Parliament. Keevil sits adjacent to three constituencies and as such a ministerial submission has been sent from the MOD in order to inform the following Members of Parliament of the proposal:

Rt Hon Dr A Murrison MP - Member of Parliament for South West Wiltshire
Ms M Donelan MP - Member of Parliament for Chippenham
Mr D R Kruger MBE MP - Member of Parliament for Devizes

Section 2 – Approach

Notification of consultation

2.1 The overarching aim of the Sponsor is to ensure that all impacted stakeholders are able to suitably participate in consultation. Notification of consultation will be varied, utilising various electronic means as well as physical publications, in order to reach a maximum number of potentially interested parties (including those without internet access). This broad approach of notification aims to meet the intent of CAP 1616 and the requirement to include seldom-heard groups in consultation⁶.

2.2 The following methods of notification will be applied:

2.2.1 Existing stakeholders will be notified of consultation via **email** following a successful CONSULT gateway. This email will inform stakeholders of the consultation material, start and finish dates as well as the methods of responding.

Additionally, reminders emails will be sent to existing stakeholders two weeks prior to the consultation end date.

2.2.2 In order to generate wider awareness official unit **social media** outlets (Facebook, Twitter and Instagram) will be used to provide detail on the consultation and link the Portal and Citizen Space should followers wish to find out more information.

Further advertisement via social media will be posted two weeks before the end of the consultation period.

2.2.3 Notification in **local parish newsletters**, including:

- Steeple Ashton
- Keevil
- Edington
- Coulston

2.2.4 Notification within the Wiltshire Times **newspaper**.

Methods of consultation

2.3 As a Level M1 change the Sponsor will consult with a variety of stakeholders, including local communities. The consultation strategy will therefore employ a variety of consultation methods with stakeholders. This will include:

2.3.1 Online consultation. This will be the primary consultation method. Targeted emails, social media and written publications will all direct stakeholders to the Citizen Space portal in order to read the consultation material and respond.

⁶ CAP 1616 p49 para 167

2.3.2 Physical consultation. Public meetings will be held to enable consultation primarily with local communities as well as stakeholders without an ability to access the online material. A number of roadshows will be planned throughout the consultation period in various locations. Feedback will still be requested formally via Citizen Space however hard copies of the consultation documentation and feedback survey will be provided for those unable to submit a response via Citizen Space. Hard copies will be attached as Annex A to the main Consultation document. Methods of requesting hard copies are outlined in para 3.5. The following physical events are planned:

- 2 x local community roadshows to be held in at the Steeple Ashton Village Hall near to the airfield.
- 1 x ACP open day to be held at Horne Barracks, Larkhill, Wiltshire.
- 1 x attendance at Keevil Annual Parish Meeting (at Parish Council's request).
- 1 x brief to the local gliding community (location TBC but planned to be at a local gliding club). A brief directly to the gliding community has been planned as a result of their proactive engagement and feedback so far and the potential impact on their operations.
- Meeting with the Wiltshire Air Ambulance.

2.3.3 Virtual consultation. A number of virtual meetings will be held throughout the consultation period. This is aimed primarily at aviation stakeholders and NATMAC organisations not geographically close the Keevil therefore unable to make any physical events.

2.4 Consultation responses will be encouraged through the Citizen Space portal however the following methods of submitting responses will also be offered.

Email (having completed the response form attached to the consultation document): 47RA-Project-LOVERIDGE@mod.gov.uk

Letter (hard copy feedback forms available at all public meetings or via Post at request):

FAO Project LOVERIDGE lead
Regimental Operations Officer
47th Regiment Royal Artillery
Horne Barracks
LARKHILL
Wiltshire
SP4 8QE

2.5 Method of publicising events. As the primary consultation method details for all events, including how to express interest and book a place (where applicable), will be found on Citizen Space. There is no limit to attendance of virtual events. Links will be published on Citizen Space to join the meeting on the dates published. All event details will also be outlined in the launch email which will allow national bodies and local authorities to disseminate details as necessary. Additionally, unit social media will be utilised to publicise events, including details on how to attend.

2.6 A limited amount of spaces will be available for the ACP Open Day in Larkhill. Expression of interest will be via email (as explained in the launch email and on Citizen Space) where additional details will be requested for security purposes.

Contingency planning

2.7 The predominant contingency to plan against is a resurgence in COVID-19. With recent relaxation in the rules and abolition of laws surrounding the pandemic it is hoped that the consultation will receive significantly more uptake by planning physical consultation.

2.8 However, should COVID-19 become a factor and limit the planned physical events the virtual and online consultation will become the primary method of consultation. In this event the Sponsor will replace any planned physical events with a virtual one. It is recognised that any future COVID restriction limiting physical contact will result in a deterioration in the ability for stakeholders with no internet access to be consulted. However, this can be mitigated provided that consultation with Parish councils can still occur in order for them to represent the views of their community.

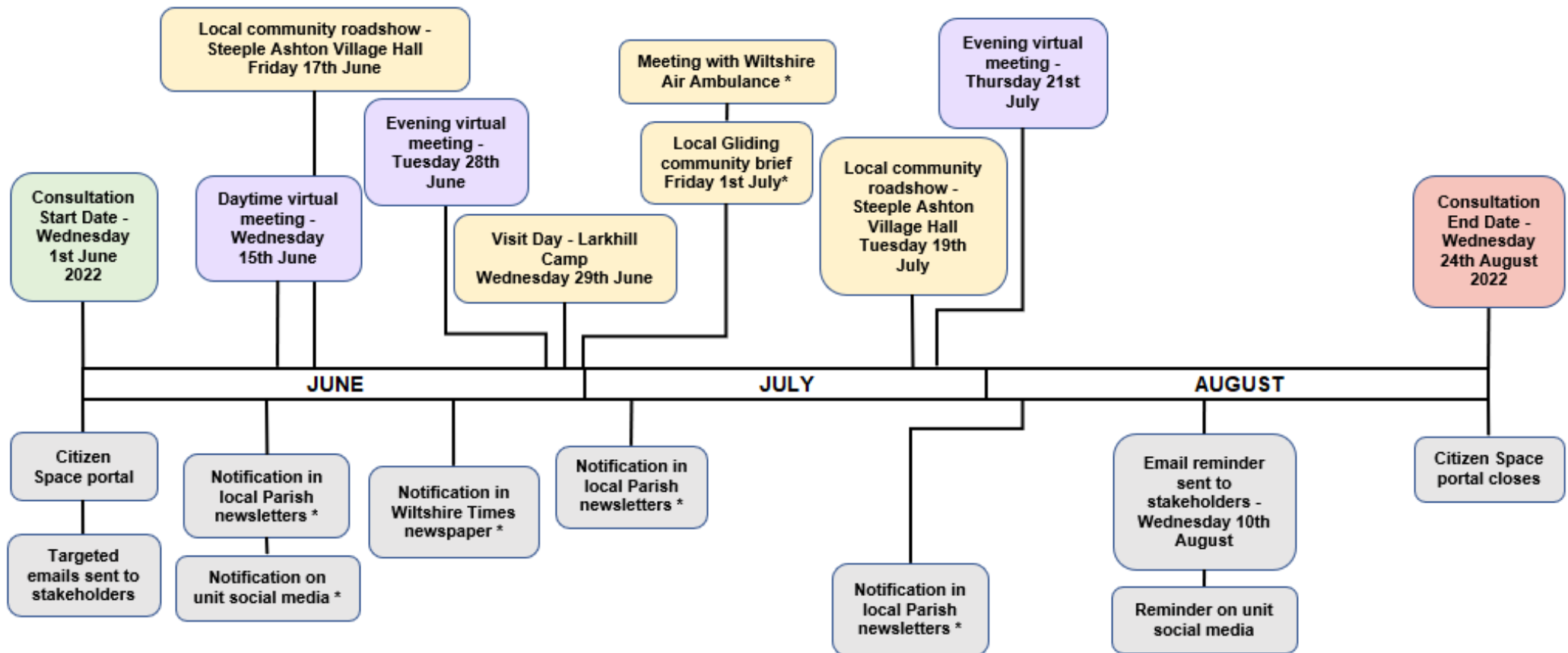
2.9 Should it be deemed that the consultation has either not provided the Sponsor with appropriate material or stakeholders sufficient opportunity to respond a contingency plan will be enacted to extend the consultation period and conduct additional events in order to generate the required feedback. This plan will be enacted in consultation with the CAA.

2.10 Any unexpected events or challenges throughout the consultation period will also lead to an extended consultation period to facilitate additional physical or virtual events.

Consultation Timeline

2.11 The consultation timeline can be found below. Dates are based on the proposed start-date of **Wednesday 1st June**. Events have been planned to ensure stakeholders have sufficient time to receive and, if necessary, promulgate material to others before commencing direct consultation – both physical and virtual.

Consultation Timeline



Section 3 - Material

Consultation Documentation

3.1 The following documentation will be presented for stakeholders to read:

- **Frequently Asked Questions.** The FAQ section will aim to answer both aviation-specific questions as well as address general themes received during previous engagement. This will be a separate document that will be updated as required throughout the consultation period should trends begin to develop with feedback questions. This will be updated via Citizen Space.
- **Consultation Document.** The main document will provide a more comprehensive breakdown of each airspace option as well as background information on the ACP. It will also include a glossary of terms.
- **Full Options Appraisal (FOA).** As part of the Stage 3 gateway the Sponsor will produce a FOA. This will be available for consultees to read should they wish to read more technical detail.

Online Portal

3.2 Citizen Space will be the primary method of providing online material to stakeholders. It will host all material outlined above and include an online feedback form. It will also provide a link to the CAA Airspace Change Portal to allow stakeholders to refer to Stage 1 and 2 documentation.

Physical Material

3.3 Physical briefings will be conducted with a PowerPoint presentation.

3.4 Hard copies of all consultation documentation will be available by request for stakeholders unable to access the online material. All documentation will include a hard copy of the feedback form and can be returned by post to the address outlined at para 2.4.

3.5 Requests for hard copies are to be made via the Project LOVERIDGE email address or by post. Hard copies will then be sent by post. The process for requesting hard copies will be outlined in the launch email.

Section 4 - Length of Consultation

4.1 The Sponsor will look to conduct a full 12-week consultation as a result of a number of factors:

- Previous engagement has identified that some stakeholders hold meetings on a monthly basis thereby limiting the opportunities for organisations to formally discuss the proposal as a collective.
- Owing to the summer holiday period (including the Queen's Platinum Jubilee celebrations) a 12-week consultation will ensure all stakeholders have had sufficient time to receive documentation, attend a consultation event (if desired) and respond.

4.2 Therefore it is the intent of the Sponsor to start consultation as soon as is practicable from the CONSULT gateway. In order to provide a short period of time post-Gateway decision for any minor rectification the Sponsor would like to propose a consultation period from **Wednesday 1st June** to **Wednesday 24th August**.

Section 5 - Post- consultation

Collate and review responses

5.1 On completion of consultation the Sponsor will review all responses and categorise for analysis. As with previous engagement feedback responses will be categorised into responses directly relating to the ACP and more general feedback that does not.

5.2 All original responses will be analysed and sent to the CAA with a redacted version uploaded to the Portal (including raw data).

Stage 4 – Update and Submit

5.3 The Sponsor will consider whether, in light of feedback received during consultation, airspace design options need significant re-design that would warrant further consultation with stakeholders.

5.4 Provided additional consultation is not required the Sponsor will begin to draft the final submission to the CAA as part of Stage 4 in order to comply with the timeline agreed with the DECIDE gateway planned for February 2023.