

ACP-2021-006 Stage 3D Categorisation of Responses v0.1

What is your name? (Q1)	Organisation / Stakeholder Type (Q2-4)	Design Preference (Q5)	Additional Airspace Design Considerations (Q7)	Proposed Amendments or Mitigations (Q8)	General Feedback (Q9)	Response may impact final proposal		Response does not change final proposal	Change Sponsor Reasoning / Justification (You said, we did)
						Impacted	Not impacted		
1	██████████ Aviation stakeholder	Option 3 - Design 1	Consider transponder mandatory zone, BUT ONLY IF the final option has no transit zone.	Maintaining a transit corridor between the existing danger areas and Keevil would be a great benefit to GA traffic.	Minimise times used.		X		A Transponder Mandatory Zone is not considered to be segregated airspace therefore would not provide the Sponsor with the airspace structure required to operate. However, it is the intention to minimise the activation time as per design principles and impact mitigations within documentation. The use of a small transit corridor has the potential to increase the risk of mid-air collision and airspace infringement.
2	██████████ Local community stakeholder	Option 2 - Design 1		No	No			X	N/A
3	██████████ Local community stakeholder	Option 3 - Design 2			Use departure and approach profiles that minimise low flying in the vicinity of houses in Keevil. Once set up, an invitation for local inhabitants to visit and view UAV ops might be a useful step for community relations.		X		The Sponsor agrees that the ability to facilitate noise abatement procedures has been factored into the airspace design options and remains a DP to adhere to with the final design. An open day for the local community in due course is something that can be conducted as suggested by this feedback.
4	██████████ Aviation stakeholder	Option 2 - Design 1	Reduce the restricted zone even further to what would only be classed as necessary	Essential activities could be achieved from any other airfield other than Keevil. We are already affected by artillery fire from the plains frequently not to add having chinooks buzz our properties every so often. Now you want to add the watchkeeper to the mix.	Keep the operations in Boscombe Down			X	As per the Design Principles the airspace option selected by this stakeholder is already the minimum required for RPAS operations. The basing of military aircraft is not relevant to this ACP.
5	██████████ Local community stakeholder	Option 2 - Design 2						X	N/A
6	██████████ Local community stakeholder	Option 2 - Design 2		None	No			X	N/A
7	██████████ Local community stakeholder	Option 2 - Design 1		None	No			X	N/A
8	██████████ Keevil Parish Council (Local community organisation)	Option 2 - Design 1		No. This is the only option that offers 47RA enough flexibility to keep the impact on our residents homes/quality of life, and the local environment /biodiversity, to an absolute minimum, whilst also reducing the impact on other airspace users as much as possible.	The Parish Council supports Option 2 Design 1. This option is the most beneficial to our community in terms of impact on residents because it avoids permanent dwellings, varies the flight routes, and has negligible impact on the environment, whilst also minimising the impact on other airspace users.		X		The Sponsor agrees that the ability to facilitate noise abatement procedures must be factored into the final design. Specific noise abatement procedures will be created in due course once the final design option has been selected.
9	██████████ Local community stakeholder	Option 2 - Design 1		No	I think that O2D1 provides the best environmental result in terms of noise, disturbance to wildlife, and impact on livestock farming in the area. It also minimises the impact on other air traffic		X		The Sponsor will factor in overflight of farms to the noise abatement procedures.
10	██████████ Hampshire and Isle of Wight Air Ambulance (Aviation stakeholder)	Option 3 - Design 2		A clear and simple means that emergency services aircraft can safely transit and operate within the airspace when responding to an incident be it either direct from the aircraft base, in this case Thruxton, or if re-tasked mid flight.	Nil		X		The Sponsor would like to expand the proposed LOA with Wiltshire Air Ambulance to include all HEMS/ NPAS in the region. This will ensure emergency services aircraft can safely operate in the vicinity when responding to an incident. The sponsor will use Centralised Aviation Data Service (CADS) to notify HEMS and NPAS aircraft of planned RPAS activity. The Sponsor will explore the use of ACANS to assist in real-time airspace notification to those HEMS on the ACANS network.
11	██████████ Local community stakeholder	Option 2 - Design 1		Transponder mandatory Zone				X	A Transponder Mandatory Zone is not considered to be segregated airspace therefore would not provide the Sponsor with the airspace structure required to operate.
12	██████████ Local community stakeholder	Option 2 - Design 1			Consider avoiding multiple overflight of a single point		X		The Sponsor agrees that the ability to facilitate noise abatement procedures to minimise overflight of the same location where possible must be factored into the final design. Specific noise abatement procedures will be created in due course once the final design option has been selected.
13	██████████ Local community stakeholder	Option 2 - Design 1						X	N/A
14	██████████ Local community stakeholder	Option 2 - Design 1						X	N/A
15	██████████ Local community stakeholder	Option 2 - Design 1			We are in full support			X	N/A
16	██████████ Coulston Parish Council (Local community organisation)	Option 2 - Design 1		Minimum transit and holding of WK in local area			X		The Sponsor agrees that the ability to facilitate noise abatement procedures to minimise overflight of the same location where possible must be factored into the final design. Specific noise abatement procedures will be created in due course once the final design option has been selected. All design options currently considers the impact of noise due to transit and holding requirements.
17	██████████ Local community stakeholder	Option 2 - Design 1						X	N/A
18	██████████ Local community stakeholder	Option 2 - Design 1						X	N/A
19	██████████ Local community stakeholder	Option 2 - Design 1		I support Option 2 Design 1 because it is the most beneficial to our community in terms of any impact on residents and the environment. Option 2 Design 1 proposes the smallest possible size of Danger Area whilst also allowing sufficient flexibility for Watchkeeper pilots to vary the flying routes to SPTA, so that they do not consistently fly over the same ground. This keeps any impact on residents and farmers to the absolute minimum and maintains a historically tranquil quality of life. The non-circular design also ensures airspace that is not needed remains free for transiting aircraft to pass through, which has the effect of keeping noise levels for residents to a minimum, as well as minimising the impact on existing air traffic.				X	Response supported. No suggestions.
20	██████████ Local community stakeholder	Option 2 - Design 1		Don't know	Air pollution not just noise pollution.			X	Air quality and CO2 emission considerations have been considered as part of the Options Appraisal process.
21	██████████ Local community stakeholder	Option 2 - Design 1		No. This is the only option that offers 47RA enough flexibility to keep the impact on our residents homes/quality of life and the local environment/biodiversity to an absolute minimum, whilst also reducing the impact on other air space users as much as possible.	Not if Option 2, Design 1 is accepted			X	Response supported. No suggestions.

22	██████	Chair, The Friends of Steeple Ashton (local community organisation)	Option 2 - Design 1	Option 2 - Design 1 appears to be the best solution for both local communities and other airspace users.		Option 2 - Design 1 offers greater flexibility for altitude and transit routes between Keevil airfield and Salisbury Plain Training Area, thereby reducing potential impact on individual communities.		X		Response supported. No suggestions.
23	██████	Local community stakeholder	Option 2 - Design 1			Your drivers are always considerate long may this continue. This is important as we live on Spiers Piece so all traffic passes us. The limited noise from traffic or drones is minimal and far preferable to Russian tanks.			X	Response supported. No suggestions.
24	██████	Local community stakeholder	Option 3 - Design 2			Minimise noise pollution		X		Transit routes and holding areas have been considered in all the Options presented.
25	██████	Local community stakeholder	Option 2 - Design 2		I have no objections to any of the planned operations	No			X	Response supported. No suggestions.
26	██████	Owner Edington Hill Airstrip (Aviation stakeholder)	Option 2 - Design 1		As the owner and one of 2 pilots at Edington Hill Airstrip I am positive about Watchkeeper being stationed at Keevil Airfield. My only request is that we have access to all lines of communication with the controllers of Watchkeeper so that reasonable use of our airstrip is maintained at all times. At last years trials the Boscombe Down controllers were the weakest link for us as they didn't know we existed and were not programmed to acknowledge that we did. As with all things in life, where there's a will we can all work together.			X		The Sponsor will explore with Salisbury Plain Air Ops whether or not any amendments to extant LOAs will help the Edington Farm Strip better integrate with this proposal. The LOA will also make reference to the Edington Hill Airstrip to aid Boscombe Down ATC awareness of the site.
27	██████	Local community stakeholder	Option 2 - Design 1		No	No			X	N/A
28	██████	Local community stakeholder	Option 2 - Design 1						X	N/A
29	██████	Edington Hill pilot (Aviation stakeholder)	Option 2 - Design 1		For Edington Hill pilots a common point of communication with yourselves would aid integration and maintain separation i.e. both parties in communication with Salisbury Ops We also use EC, ADSB in and out on both aircraft hangared at Edington Hill, and last year we were able to monitor the position of the Drone while on approach into our runway. I believe it would aid integration if we could report that we have the drone visual on EC and were maintaining separation.			X		Clear and defined lines of communication are to be articulated in the LOA with Salisbury Plain Air Ops/ Boscombe Down. The use of EC/ADSB will not necessarily provide additional freedom in the short-term but must be considered moving forward as part of the Airspace Modernisation Strategy.
30	██████	Local community stakeholder	Option 2 - Design 1		No	None			X	N/A
31	██████	Local community stakeholder	Option 2 - Design 1		Mandatory transponder use	No			X	A Transponder Mandatory Zone does not provide, by definition, the segregated airspace that is required for operating RPAS BVLOS within current regulation.
32	██████	Local community stakeholder	Option 2 - Design 1		None that I know of	Consideration being given to any possible reduction in activity			X	Airspace use and requirement must be reviewed yearly.
33	██████	Steeple Ashton Parish Council (Local community organisation)	Option 2 - Design 1		It seems sensible to minimise the airspace area so as not to impact on the air ambulance operations nor to narrow the flightpath between Keevil and the Bristol airport airspace.	By keeping the connection between Keevil and the training area as wide as possible it enables multiple flying routes, thus minimising the impact on local villages. All efforts should be made to minimise vehicle movements through villages when both deploying to Keevil and during the period of operation. It would be useful to have a contact point at the regiment for the Parish Council to be able to communicate with so we can feedback any comments that we receive. Continuation of the annual open day event for villagers would be a good PR exercise and welcomed by the community.		X		The operating procedures and ground movement considerations will be factored in to exercise SOPs. The Sponsor agrees that Option 2 Design 1 has the widest frontage between Keevil and D123 compared with Option3 designs.
34	██████	British Gliding Association (NATMAC organisation)	Option 3 - Design 2		As the WK is equipped with ADS-B (out) a design option allowing free access if crossing aircraft were either Mode S transponder or ADS-B out equipped (Effectively an ADS-B/Transponder Zone) should be considered, perhaps with a requirement to call if within the bottom 1500' of the DA? All the options specify an altitude of SFC-3500' for the DA (apart from the options with a small vertical area from 1500-3500'). Routine operations of the WK require only 2500' or less. The extra 1000' from 2500' to 3500' is just a contingency for very rare emergency recovery procedures. We believe that this does not comply with the need to only establish the minimum practically necessary airspace to meet the task. We would hope that whenever oAs the WK is equipped with ADS-B (out) a design option allowing free access if crossing aircraft were either Mode S transponder or ADS-B out equipped (Effectively an ADS-B/Transponder Zone) should be considered, perhaps with a requirement to call if within the bottom 1500' of the DA? All the options specify an altitude of SFC-3500' for the DA (apart from the options with a small vertical area from 1500-3500'). Routine operations of the WK require only 2500' or less. The extra 1000' from 2500' to 3500' is just a contingency for very rare emergency recovery procedures. We believe that this does not comply with the need to only establish the minimum practically necessary airspace to meet the task. We would hope that whenever operationally acceptable NOTAM'ed activation would include a vertical cap at 2500' or less.	We recognise the need for the MoD to train with RPAS. We are keen to ensure harmonious and equitable use of airspace, and to minimise the negative impact on class G operations. We would like to note that the printed documentation delivered at the presentation was different to the documentation published online. Confusion was created by labelling Option 1 Design 1 in the printouts that aligned with Option 2 Design 1 online. The documentation refers on several occasions to the fact that there is a note on the ICAO charts that 'Keevil Aerodrome is used extensively as a military dropping zone and pilots are advised to avoid the aerodrome at all times by 2nm laterally and 2000' vertically'. The reality is that Keevil aerodrome is used only occasionally for this purpose. This note is advisory only. Most pilots either check activity by radio or lookout for activity as they pass nearby or within the area. The ACP documentation suggests that this note effectively means that protective airspace is already in place which is not the case at all. We are very concerned that the Danger Area NOTAM activation principle will not be an effective method of ensuring equitable access to airspace. Experience from the TDA operations in 2021 shows that the airspace was activated by NOTAM on many more occasions than when WK operations actually took place. We think it would be reasonable for the MOD to publish these statistics with associated evidence/mitigation and explanation. Furthermore, access to the airspace to be acquired via clearance from Boscombe DACS is impractical for most glider pilots. Their frequency is already often congested (especially on fine soaring days) and the process of waiting on the frequency for an opportunity to get 2-way communication with the controller, followed by passing i/d info and then waiting for the controller to have time to call and respond to Keevil operations before finally having time to report back to the glider pilot, is unworkable for a pilot already busy concentrating on staying airborne at a relatively low level. However, the documentation states that the WK operations will be able to provide situational awareness for transiting aircraft via SAFETYCOM (135.480). If this means that pilots can call on this frequency and be given authority to enter, when appropriate, the DA (perhaps with caveats such as an obligation to listen out whilst in the airspace) the BGA would support this procedure. If a discrete frequency was made available this would make this procedure even more convenient. The documentation states that the DA will have an effect on 'some gliding activity from sites such as The Park, Upavon and Rivar Hill'. Although these sites are nearby there are a far larger number of gliders that are based at Lasham, Nympsfield, Aston Down, Cheddar, North Hill, Eyres Field, Bidford and Talgarth (all within easy cross-country range of the proposed DA) that will be affected by restricted airspace over Keevil. If forced to avoid Keevil the 'tunnelling effect' created by squeezing the gap between Bristol and SPTA airspace will have a significant negative impact on safety. We can provide a heat map of supplied logged flights to help you understand the scale of the issue. Please do let us know if that will be of use.	No	X		Regarding the error in the incorrectly titled Options presented in the printed questionnaire vs the online questionnaire- this error was noted at the time and discussed with the Stakeholders when delivering the presentation. Unfortunately, a Transponder Mandatory Zone does not provide the required Segregation required to operate RPAS in UK airspace. The maximum altitude of the required airspace will be refined during the Final Proposal, to the absolute minimum required. On occasions that the maximum Altitude of the desired airspace is not required (i.e., during Circuit only exercises as an example) then only the required altitude will be NOTAM'ed. New consideration: The use of a radio frequency will be taken forward to Stage 4 for consideration in the final proposal and discussed with DAATM/ CAA.
35	██████	Local community stakeholder	Option 2 - Design 1			We are very grateful for the effort taken by the Army/47 Regiment to consult with local communities and provide informative briefings. The use of 'Option 2 - Design 1' should enable more flexibility for transit routes and altitude and thereby reduce the potential noise issue for local communities, while enabling more effective operational training over Salisbury Plain Training Area for Watchkeeper. To date we have had no issues with the considerate transit of 47 Regiment troops and equipment to/from Keevil.		X		Response supported. No suggestions.

36		Bath, Wilts and North Dorset Gliding Club (Aviation stakeholder)	Option 3 - Design 2	<p>We question the requirement to specify a DA to 3500 ft for normal operations. It appears to us to be for those exceedingly rare occasions when an emergency recovery of Watchkeeper might be required. We propose that this eventuality should be covered by the sensible use of an assigned radio frequency for use during Watchkeeper operations.</p>	<p>This additional proposed DA would cause a significant loss of frequently used airspace for our Gliding operations. It is generally unwelcome to us.</p> <p>It would increase the collision and out-landing risk to our glider pilots owing to its funneling effects to the north of Keevil airfield. It would also require gliders to divert further to the north when planning to fly to eastwards from the Westbury area, a route frequently used by our novice pilots on early cross country flights. It adds additional track miles and forces gliders closer to the built up areas of Trowbridge, Melksham and Devizes.</p> <p>In the context of these statements it should not be a surprise that we would prefer the less extensive areas of the options proposed. Any further reductions in area would be welcome to us, as would a reduction in the proposed height.</p> <p>A local consideration for us is that of novice pilots becoming caught in the inevitable wedges of Class G airspace to the east and west of the Keevil DA under any of these proposed arrangements, without the option of by-passing Keevil through the narrow strip of Class G airspace between Keevil and Salisbury Plain. Low performance gliders, as flown by novice pilots, have difficulty penetrating against the wind and could find themselves stuck in one of these "wedges", possibly forcing a field landing without easy access to the option of landing at Keevil airfield. Radio contact would mitigate this risk for more experienced pilots, but would add significantly to the workload and risk borne by a novice pilot in such a position.</p> <p>It was apparent during the TDA trial period in 2021 that radio contact for a DA crossing or entry was inadequate. Should a DA arise from this proposal we think it vital that a dedicated frequency should be used for any pilots in the region of Keevil, so that rapid, clear and unambiguous information could be exchanged regarding the state of the DA and to provide crossing or landing clearances as required. The use of the Boscombe Down frequency was wholly inadequate last year, owing to the apparent lack of clear and detailed information for the controllers, and the use of the very busy frequency for LARS and local services.</p> <p>Our experience during the operation of the TDA gives us little confidence that DA crossings would be granted. We request the statistics for how many TDA crossings were requested and/or granted during the NOTAMed hours of operation of the Watchkeeper, and the comparison of these with the times when Watchkeeper was actually in flight and using the Keevil TDA. Our expectations had been that crossings would be easily granted when Watchkeeper was above the Salisbury Plain danger area. Our experience leads us to the belief that during the NOTAMed hours of operation TDA crossings may have been refused irrespective of whether Watchkeeper was on the ground, above Keevil or away above Salisbury Plain. For any future operation we would need strong assurances that crossings would be easily granted except when the Watchkeeper is actively using the Keevil DA, including departures and arrivals. Our strong preference would be for the TDA to be switched off as soon as Watchkeeper is clear of the area, and to use a radio service to advise transiting traffic of its status.</p>	<p>The Bath, Wilts and North Dorset Gliding Club is a club of approximately 120 members based just to the south of Warminster at the airfield known as The Park. Its member pilots are frequent flyers in the piece of airspace under consideration. We wish to emphasise that this DA proposal degrades our operation quite significantly.</p> <p>For emphasis and clarity, this response should be given due weighting as representing that of a significant local flying operation. It is NOT the response of one individual alone.</p> <p>As a British Gliding Association (BGA) member club we wish to state that we fully support the response of our governing body. Our comments here reflect our local operational situation and should be considered in addition to those of the BGA.</p> <p>(On an admin and response feedback point, please note that the Q7 box on this response form will not open as a full field of text and needs to be read as a long string, making it difficult to fill and edit.)</p>	X			<p>The maximum altitude of the required airspace will be refined during the Final Proposal, to the absolute minimum required by the Duty Holding chain. On occasions that the maximum Altitude of the desired airspace is not required (i.e., during circuit only exercises as an example) then only the required altitude will be NOTAM'ed.</p> <p>Compared to the ever-developing procedures adopted during the TDA over Keevil in the summer of 2021, the nature of a permanent facility will ensure more streamlined and improved procedures as those involved will be more familiar with the use of it. Procedures will also be able to be tested better over time to accommodate the wider community.</p> <p>New consideration: The use of a radio frequency will be taken forward to Stage 4 for consideration in the final proposal and discussed with DAATM/ CAA.</p>
37		British Microlight Aircraft Association (BMAA) - (NATMAC organisation)	Option 3 - Design 2	<p>Reconsider height reduction to 2000ft AGL</p>	<p>Having had the opportunity to attend the virtual meeting and presentation by yourselves on 21 July 2022 I would like to make the following response:</p> <p>1.1 felt that the local airspace use trend in the consultation presentation was inadequate in that (a) it covered far too short a period for a permanent DA ACP; (b) the data was limited to FLARM and ADS-B signals. I would strongly recommend that the sponsor contact SkyDemon (tel 01373-470452 / www.skydemon.aero) and requests a "heat map" of all SkyDemon user tracks for the region over 2019 (being the last typical full year of flying) and to compare this data.</p> <p>2.After careful consideration of the sponsor's needs and the information discussed during the consultation the BMAA would want to see the following conditions for any approval of this ACP:</p> <p>a.Preferred airspace structure would be either Option 3 Design 2 or Option 2 Design 1.</p> <p>b.We would recommend reconsideration of the height for the DA; 3,500ft AGL seems excessive for the RPAS requirement to transit to/from the SPTA.</p> <p>c.A fully resourced DACS available at all times.</p> <p>d.A dedicated ATIS providing real-time information on the activity status of the DA and any other activity at Keevil airfield so that, in the event of the DA being inactive, GA traffic could transit Keevil without the need for any further approval.</p> <p>e.NOTAM information of all contact frequencies, ATIS and telephone.</p>	<p>Having had the opportunity to attend the virtual meeting and presentation by yourselves on 21 July 2022 I would like to make the following response:</p> <p>1.1 felt that the local airspace use trend in the consultation presentation was inadequate in that (a) it covered far too short a period for a permanent DA ACP; (b) the data was limited to FLARM and ADS-B signals. I would strongly recommend that the sponsor contact SkyDemon (tel 01373-470452 / www.skydemon.aero) and requests a "heat map" of all SkyDemon user tracks for the region over 2019 (being the last typical full year of flying) and to compare this data.</p> <p>2.After careful consideration of the sponsor's needs and the information discussed during the consultation the BMAA would want to see the following conditions for any approval of this ACP:</p> <p>a.Preferred airspace structure would be either Option 3 Design 2 or Option 2 Design 1.</p> <p>b.We would recommend reconsideration of the height for the DA; 3,500ft AGL seems excessive for the RPAS requirement to transit to/from the SPTA.</p> <p>c.A fully resourced DACS available at all times.</p> <p>d.A dedicated ATIS providing real-time information on the activity status of the DA and any other activity at Keevil airfield so that, in the event of the DA being inactive, GA traffic could transit Keevil without the need for any further approval.</p> <p>e.NOTAM information of all contact frequencies, ATIS and telephone.</p>	X			<p>The maximum altitude of the required airspace will be refined during the Final Proposal, to the absolute minimum required by the Duty Holding chain. On occasions that the maximum Altitude of the desired airspace is not required (i.e., during Circuit only exercises as an example) then only the required altitude will be NOTAM'ed.</p> <p>The Sponsor thanks the Stakeholder for the information regarding the SkyDemon heat map showing traces around the Keevil area. We did receive a Heat map which indicates a similar trend to that of our data published. This evidence will be made available to the CAA as part of the Final Proposal however SkyDemon has not granted permission for us to use the heatmap within the public-facing Final Options Appraisal.</p> <p>New Consideration: The use of an ATIS frequency to provide real-time updates on activation status will be considered.</p>
38		Avon Hang Gliding & Paragliding Club (Aviation stakeholder)	Option 3 - Design 2	<p>Modifications of Option 3 (either design) would significantly reduce the negative impact on hang gliding and paragliding activity. See answer to 8 for further detail.</p>	<p>NOTAMing a Danger Area for 9 hours when its actual use by the Watchkeeper will be around 15 minutes is patently ludicrous and totally unacceptable. At the very least, phone requests for a transit time slot and/or transit permission for electronically conspicuous aircraft need to be made available as part of the proposal.</p> <p>All of the available designs will severely and unnecessarily restrict our long-established local activity, as the amount of newly-restricted airspace is completely disproportionate to the stated operational requirement, and this will be our position when the proposal is submitted to the CAA. That position notwithstanding, we offer the following comments on the current Options, starting by setting out the two principal considerations here for foot-launched unpowered aircraft, most of whom will have launched from the long-established sites at Westbury White Horse and Bratton Camp (immediately to the east of the horse):</p> <p>1. Minimising the impingement on our ability to enjoy local soaring flights;</p> <p>2. Maintaining the ability to undertake cross-country flights (one-way, out-and-return and triangle) that require us at one point or another to pass from above Edington to above Erlestoke or vice-versa, and/or to utilise airspace encompassed by the main proposed cylinder.</p> <p>Additionally, as is noted in the FAQs, we have a concern about potential funneling of aircraft at low level towards and across the front of our long-established sites, which often have high concentrations of slow moving, unpowered aircraft. With Option 2, neither Design is remotely acceptable to us, as even local flying on our Bratton Camp site would be significantly curtailed.</p> <p>The most useful alteration that could be made to Design 3 (either version) would be to amend the vertical height and/or detail of the transit corridor, and potentially also of the area of the main cylinder closest to it, to improve "our" ability to transit the same area, at different altitudes. Realistically, no-one on an unpowered cross-country flight is going to be able to use the SFC to 1500ft AMSL segment underneath the current design to effect such a transit; this is also the area of greatest concern for us in terms of funneling aircraft across the front of our sites. Very few of our aircraft fly in that segment at all, unless they have been attempting a cross-country flight and have "sunk out" on their way back to the hill.</p> <p>The transit corridor ceiling and height should both be as low as possible. With a typical UK cloudbase on usable cross-country days of between 4000 and 6000ft AMSL, a transit corridor with its base at 1000ft AMSL and its ceiling at 2500ft AMSL would be a significant improvement that would allow pilots leaving cloudbase to the west of the corridor to have significant confidence in being able to make it to the eastern side of the corridor without risk of sinking into it from above. 750ft to 2000ft AMSL would be even better. If it were possible to then combine this with a reduction in the ceiling of the main cylinder closest to the transit corridor, that would significantly reduce the impingement on our ability to undertake local flights, as per 1. Is there even any rationale behind the main cylinder ceiling being as high as 3500ft AMSL? Why does the Watchkeeper not gain/lose its height over D123 itself? Again, on a typical cross-country day, pilots flying "out the front" from Bratton Camp will be significantly less hampered by a 2500ft (or even 2000ft) AMSL ceiling than a 3500ft one.</p>	<p>As five or more Watchkeepers have already crashed in the UK, the confidence of local residents that they won't fall victim to such an incident will be higher if the airspace deemed necessary to operate the UAVs is minimised such that it is clearly proportional to the number of flights and the expected high accuracy of the operation.</p>	X			<p>Currently within the UK airspace cannot be dynamically managed as described, although as part of the airspace modernisation strategy it aims to be in the future. However, in the meantime airspace will be required to be activated for the whole period in which it may be used (although this is mitigated for the majority of air traffic in the region if they can obtain a DACS).</p> <p>New consideration: Ensure that the extant agreement between SPTA and paragliders is updated to include RPAS procedures. Explore the creation of a bespoke agreement with the paragliders to minimise impact of DA on their operations.</p> <p>It is recognised that this still may change the way in which free flying is currently being conducted however this will only be limited to the times of activation and not H24, 7 days a week.</p>
39		Aviation stakeholder	Option 3 - Design 2	<p>Option 3 / Design 2 shifted as far ENE as possible, even just 2 miles would be so much better. Westbury White horse is one of the best HG/PG XC sites in the SW of England and this airspace grab is very upsetting</p>	<p>Assuming ops are not continuous day-by-day, use the NOTAM process for notifying when in use, hence leaving if free-for-use when unused</p>				X	<p>A shift of the airspace ENE would not meet the requirements to operate RPAS safely within segregated airspace.</p> <p>NOTAMs will be utilised to ensure the airspace is only used when required, therefore ensuring the current airspace remains unchanged and free for general aviation use when not activated.</p>

40	████	Aviation stakeholder	Option 3 - Design 2	Airspace Design: Modifications of Option 3 (either design) would significantly reduce the negative impact on hang gliding and paragliding activity. See answer to 8 for further detail.	<p>NOTAMing a Danger Area for 9 hours when its actual use by the Watchkeeper will be around 15 minutes is patently ludicrous and totally unacceptable. At the very least, phone requests for a transit time slot and/or transit permission for electronically conspicuous aircraft need to be made available as part of the proposal.</p> <p>All of the available designs will severely and unnecessarily restrict our long-established local activity, as the amount of newly-restricted airspace is completely disproportionate to the stated operational requirement, and this will be our position when the proposal is submitted to the CAA. That position notwithstanding, we offer the following comments on the current Options, starting by setting out the two principal considerations here for foot-launched unpowered aircraft, most of whom will have launched from the long-established sites at Westbury White Horse and Bratton Camp (immediately to the east of the horse):</p> <p>1. Minimising the impingement on our ability to enjoy local soaring flights;</p> <p>2. Maintaining the ability to undertake cross-country flights (one-way, out-and-return and triangle) that require us at one point or another to pass from above Edington to above Erlestoke or vice-versa, and/or to utilise airspace encompassed by the main proposed cylinder.</p> <p>Additionally, as is noted in the FAQs, we have a concern about potential funneling of aircraft at low level towards and across the front of our long-established sites, which often have high concentrations of slow moving, unpowered aircraft.</p> <p>With Option 2, neither Design is remotely acceptable to us, as even local flying on our Bratton Camp site would be significantly curtailed. The most useful alteration that could be made to Design 3 (either version) would be to amend the vertical height and/or detail of the transit corridor, and potentially also of the area of the main cylinder closest to it, to improve "our" ability to transit the same area, at different altitudes. Realistically, no-one on an unpowered cross-country flight is going to be able to use the SFC to 1500ft AMSL segment underneath the current design to effect such a transit; this is also the area of greatest concern for us in terms of funneling aircraft across the front of our sites. Very few of our aircraft fly in that segment at all, unless they have been attempting a cross-country flight and have "sunk out" on their way back to the hill.</p> <p>The transit corridor ceiling and height should both be as low as possible. With a typical UK cloudbase on usable cross-country days of between 4000 and 6000ft AMSL, a transit corridor with its base at 1000ft AMSL and its ceiling at 2500ft AMSL would be a significant improvement that would allow pilots leaving cloudbase to the west of the corridor to have significant confidence in being able to make it to the eastern side of the corridor without risk of sinking into it from above. 750ft to 2000ft AMSL would be even better.</p> <p>If it were possible to then combine this with a reduction in the ceiling of the main cylinder closest to the transit corridor, that would significantly reduce the impingement on our ability to undertake local flights, as per 1. Is there even any rationale behind the main cylinder ceiling being as high as 3500ft AMSL? Why does the Watchkeeper not gain/lose its height over D123 itself? Again, on a typical cross-country day, pilots flying "out the front" from Bratton Camp will be significantly less hampered by a 2500ft (or even 2000ft) AMSL ceiling than a 3500ft one.</p>		X			<p>Currently within the UK airspace cannot be dynamically managed as described, although as part of the airspace modernisation strategy it aims to be in the future. However, in the meantime airspace will be required to be activated for the whole period in which it may be used (although this is mitigated for the majority of air traffic in the region if they can obtain a DACS).</p> <p>New consideration: Ensure that the extant agreement between SPTA and paragliders is updated to include RPAS procedures. Explore the creation of a bespoke agreement with the paragliders to minimise impact of DA on their operations.</p> <p>It is recognised that this still may change the way in which free flying is currently being conducted however this will only be limited to the times of activation and not H24, 7 days a week.</p>
41	████	Aviation stakeholder	Option 3 - Design 2	Base drones in your existing restricted area	<p>Don't use Keevil.</p> <p>Use vehicles as drone base and operate from within your restricted areas.</p> <p>See how Ukrainians use drones. Develop a model based on a system that is working now.</p>	<p>Commercial drones have already proved unreliable. You are risking crashing on built up areas.</p> <p>Free flying has been established in the White Horse Bratton area for 30 years. All your options will end this.</p>	X			<p>The decision to use Keevil falls outside of the scope of this ACP. The MOD limits the overflight over populated areas to only what is necessary but aims to avoid directly overflying population at all times.</p> <p>New consideration: Ensure that the extant agreement between SPTA and paragliders is updated to include RPAS procedures. Explore the creation of a bespoke agreement with the paragliders to minimise impact of DA on their operations.</p>
42	████	Winterstoke Hundred Academy (Aviation stakeholder)	Option 3 - Design 2		<p>Local flying on the hill can only be used when the wind is from the West to the North. All other times, it cannot be flown by footlaunch paragliders and hang gliders. Accordingly, the NOTAM or danger area should only be active when the wind is in not in that direction, which would give the MOD much flyable time in this ludicrous airspace grab, and yet minimise the effect on GA and the free flying community who have flown these sites for decades.</p>	<p>The paragliding, hang gliding and GA communities will resist this in the strongest possible terms. The MOD have all of Salisbury Plain on which to operate. Extending outside of this, and impacting local communities cannot be acceptable.</p>	X			<p>New consideration: Ensure that the extant agreement between SPTA and paragliders is updated to include RPAS procedures. Explore the creation of a bespoke agreement with the paragliders to minimise impact of DA on their operations.</p>
43	████	Local community stakeholder	Option 2 - Design 1			<p>We appreciate the trouble taken by the Army to brief us on deployment of Watchkeeper at Keevil Airfield. The transit to Salisbury Plain route and altitude flexibility offered by Option 2 - Design 1 provides local communities with the best solution for reducing noise while enabling the Army to train and develop their capability.</p>			X	
44	████	Wiltshire Council (local community organisation)	Option 2 - Design 1			<p>Public Protection is to be consulted regarding any noise developments and a copy of the Qualitative Assessment of Air Quality detailed in Section 9 of the Environmental Impact Assessment is requested. Additionally, vehicle movements during both construction and operation are to be minimised to ensure existing residents are not adversely impacted by the proposal. Lastly, it is noted residents are to contact the Low Flying Complaints and Enquiries Unit on SWK-lowflying@mod.gov.uk with any complaints. It is requested this information continues to be made clearly available to residents.</p>			X	<p>MOD aircraft are exempt from air quality impacts of their operations. As per the Environmental Impact Assessment it has been concluded that there is a negligible consequential impact on the local area.</p> <p>The movement of ground vehicles are managed through exercise SOPs.</p> <p>The details of the Low Flying Complaints Unit is an MOD facility, details of which can be found online. The distribution of this information will be the responsibility of the aerodrome operator.</p>
45	████	Aviation stakeholder	Option 2 - Design 1	General aviation usage	<p>Clear lines of communication with defence stake holders in Brize as to usage of the airspace out of BLOS usage hours</p>	<p>Local residents must be informed of any intrusive low flying in the area</p>			X	
46	████	Local community stakeholder	Option 2 - Design 1			<p>Local community members have had the opportunity to attend various open days and briefings provided by the Army in relation to the use of Keevil Airfield by Watchkeeper. We have historically been very supportive of the MOD usage of the airfield, and this support continues. Option 2 - Design 1 applies lessons learned from the previous Watchkeeper deployment to Keevil, and offers wider flexibility for deployment to and from Salisbury Plain Training Area. Having had the benefit of the briefings, with clear explanation of the purpose of the proposed air space change and the intent to minimise wider impacts on stakeholders while placing safety first and foremost, it is of concern to note a number of ill-informed and emotive comments submitted by a few of the airspace stakeholders (eg 'airspace landgrab). While appreciating any valid concern they might have for reduced access to airspace, it is perhaps worth noting that the local communities contain many taxpayers who would be somewhat dismayed if the narrow concerns of recreational air space users were in any way to compromise the evolving and important potential offered by Keevil for military training and the enhancement of defence operational capability.</p>			X	<p>Response supported. No suggestions.</p>
47	████	Aviation stakeholder	Option 2 - Design 1	simple corridor from Keevil to the Plain and nothing north of the airfield	<p>It is critical for sport aviation that the zone is as small as possible and remains as much on the Plain as possible, not taking what is currently open airspace.</p> <p>please consider making the zone time limited, for example weekdays 10am to 4pm local time only</p>			X		<p>Option 2 limits the extent of the airspace North of the airfield as much as possible. Additionally a DACS will allow radio-equipped aircraft to transit when possible.</p> <p>Timings for airspace activation are already included in the documentation and will be limited (and activated only when required).</p>
48	████	Aviation stakeholder	Option 2 - Design 1						X	
49	████	Aviation stakeholder	Option 2 - Design 1	Smallest corridor possible instead of a large circle					X	<p>A small corridor only would not facilitate a circuit pattern, nor would it allow for noise abatement.</p>

50	██████	Western Region British Balloon and Airship Club (Aviation stakeholder)	Option 3 - Design 1	A small corridor to Salisbury Plain is all that is required	I understand the requirement to use UAV's but to blanket a large piece of airspace making it impossible to fly balloons in that area is unfair				X	The Sponsor believes that, as the proposed airspace will only be activated via NOTAM during the working day, that the effect on hot air balloon operations will be minimised. A small corridor only would not facilitate a circuit pattern, nor would it allow for noise abatement.
51	██████	Aviation stakeholder	Option 2 - Design 1	Instead of large circular airspace, A corridor from Keevil to Salisbury Plain would reduce the impact on other airspace users.	As a Hot Air Balloon Pilot this proposed Airspace change will reduce my ability to fly to the East of Trowbridge. A mitigation might be for this airspace to not be 'active' during early mornings & evenings when our flying takes place i.e not 24hr. Another mitigation, might be a 'corridor' of airspace from Keevil to Salisbury Plain, rather than the large circular airspace being proposed.	nil			X	These mitigations are already proposed within the documentation. The airspace will only be activated by NOTAM when required. Additionally, the proposed hours of operation during the working week will limit the effect on hot air balloons.
52	██████	Aviation stakeholder	Option 2 - Design 1	Smaller corridor Salisbury plain					X	A small corridor only would not facilitate a circuit pattern, nor would it allow for noise abatement.
53	██████	Aviation stakeholder	Option 3 - Design 2						X	N/A
54	██████	Aviation stakeholder	Option 3 - Design 1		Published times and contact numbers				X	Activation times and contact numbers will be published via NOTAM during periods of operation.
55	██████	Aviation stakeholder	Option 2 - Design 1		Limited hours of operation?				X	Hours of operation will be limited to only what is required to operate and promulgated via NOTAM.
56	██████	British Balloon and Airship Club (Western Region) (Aviation stakeholder)	Option 2 - Design 1	Smaller diameter circle and narrower corridor	See answer to 7 for design amendments. Published operational times that are long enough for military objectives but short enough to reduce impact on other air users.				X	This design change would not facilitate the segregated airspace required to operate between Keevil and SPTA. Design Principle is to create airspace that is the minimum amount possible.
57	██████	Aviation stakeholder	Option 3 - Design 2	A small corridor from air field to Salisbury plain not big circle					X	A small corridor only would not facilitate a circuit pattern, nor would it allow for noise abatement.
58	██████	Airspace4All Trust (Aviation stakeholder)	Option 2 - Design 1		Yes Prior to flight, other airspace users need to be able to access the forecast status of the DA for planning purposes. This is best achieved by NOTAM but it needs to be up to date with any activity changes. Whilst there would appear to be minimal differences between Option 2 Design 1 and Option 3 Design 2 it is noted that Option 3 Design 2 requires two NOTAM to cover activation with greater risk of information being missed. During flight other airspace users need to be able to obtain DACS when the DA is active and notification that it is safe to cross when inactive. We understand that the former will be provided by Boscombe Down approach (by then delivered from RAF Brize Norton). However even when Boscombe Down approach is closed, airspace users will need to confirm that the DA is inactive so that they do not inadvertently infringe the DA. This could be done through an "ATIS" on the Boscombe Down frequency. We understand that comms equipment will be available to do that. For completeness, such an "ATIS" could usefully carry the gliding site activity status when the DA is inactive.	No		X		The Sponsor notes the comment regarding the requirement to use multiple NOTAMs for Option 3 and the potential increased risk fo missing information. New consideration: The use of an ATIS frequency will be taken forward to Stage 4 for consideration in the final proposal and discussed with DAATM/ CAA.
59	██████	Aviation stakeholder	Option 2 - Design 1						X	To keep the controlled airspace to a minimum, with limited hours of operation.
60	██████	Aviation stakeholder	Option 2 - Design 1						X	Nil
61	██████	Aviation stakeholder	Option 2 - Design 1	I see no vertical limits. The top limit should be no higher than 500' agl.	The military authorities have a consistent record of reserving airspace for themselves that they do not need. This is a natural result of the military's way of managing this airspace. Evidence: Colerne ATZ; Watchkeeper airspace at Keevil during 2021. The assurances offered in this document can not be relied on. The MoD must be required to publish auditable data for how the airspace has been used.				X	The vertical dimensions were published within all consultation documentation. SFC-500ft will not facilitate BVLOS transit into SPTA.
62	██████	Local community stakeholder	Option 2 - Design 1						X	Noise abatement procedures will be created in due course once the final design option has been selected and remain a key principle in selecting the final airspace design. The aircraft cameras will not gather data on private property. During take-off and landing they are used to provide the pilots with situational awareness but will only be used for surveillance when over Salisbury Plain Training Area.
63	██████	Steeple Ashton Parish Council (Local community organisation)	Option 2 - Design 1		I don't have the knowledge to answer this, hence no.				X	Minimise vehicle movements on village roads and strictly obey speed limits. Keeping below 20 mph through the centre of Steeple Ashton would be appreciated.
64	██████	Aviation stakeholder	Option 2 - Design 1	Option Zero - do nothing and move proposed RPAS to Netheravon/Uphavon	Where is the justification that this is essential military activity leading to an increase in regulated airspace in this key VFR transit area. Why are not Uphavon or Netheravon, both of which lie wholly within the Salisbury Plain Danger Areas being used for this RPAS activity - which would have zero impact on aviation users, the Keevil local community and the environment. If the airspace change is forced through then I request the new regulated airspace is activated for the absolute minimum amount of time with multiple sources used to promulgate its activation. Any permanent/long term activity would be an unjustified take over of Class G airspace	Watchkeeper has a very poor safety record. The activity should be wholly contained within the Danger Area complex			X	The choice to operate RPAS from Keevil falls outside the remit of this ACP.