

CAA Consultation Assessment

Title of airspace change proposal	Enabling BVLOS UAS Operations from Keevil Airfield
Change sponsor	MOD
Project reference	ACP-2021-006
Account Manager	[REDACTED]
Case study commencement date	10/11/2022
Case study report as at	30/01/2023

Instructions

In providing a response for each question, please ensure that the 'status' column is completed using the following options:

- YES
- NO
- PARTIALLY
- N/A

To aid the SARG Lead it may be useful that each question is also highlighted accordingly to illustrate what is:

resolved YES not resolved PARTIALLY not compliant NO

Executive Summary

The Ministry of Defence (MOD), the change sponsor, is seeking to establish a permanent Danger Area (DA) to facilitate the operation of Remotely Piloted Air Systems (RPAS) Beyond Visual Line of Sight (BVLOS) between Keevil Airfield and the existing Danger Areas of Salisbury Plain Training Area (SPTA). Civil and military regulation dictates that RPAS operating BVLOS within UK airspace without a certified Detect and Avoid (DAA) capability must operate within segregated airspace and, at the moment of developing this Airspace Change Proposal (ACP), a Danger Area is only the acceptable means of achieving it.

Prior to developing this permanent airspace change proposal, the MOD had operated the Watchkeeper RPAS in a Temporary Danger Area (TDA) (ACP-2020-047) for three months (summer 2021), in order to assess the viability of future operations of RPAS from Keevil into SPTA to support military training.

Over a period of 12 weeks, the change sponsor consulted on two options, which were further divided into two designs to determine which would provide the best balance in terms of minimising impact on local communities and airspace users while facilitation MOD requirements. The first

option, referred to as Option 2, was a simple design consisting of a single structure connected to the Salisbury Plain Danger Area. The second, referred to as Option 3, was a multi-sectored design, with one Danger Area around Keevil airfield to facilitate take-off and landings, and the other “hanging airspace” DA to facilitate the crossing of the RPAS into the SPTA DA. The change sponsor’s preferred option was Option 2. The consultation explained the operating principles, the impact mitigations and emergency procedures that would apply to both options.

The sponsor received a total of 66 responses from a mixed range of stakeholders and revised their proposed airspace design as a result of consultation feedback. The sponsor is progressing their preferred Option 2 (Design 1) as their final design with a minor reduction to the DA’s ceiling. To limit the impact on airspace users further, the sponsor is also seeking to provide Danger Area Crossing Service (DACs). Revision to the design does not fundamentally alter the proposal consulted on and therefore there is no requirement for the sponsor to reconsult, as per Para 200, CAP1616.

PART A – Summary of Airspace Change Process to date

A.1	https://airspacechange.caa.co.uk/PublicProposalArea?pid=341	
A.2	Stage 1 DEFINE Gateway	17/12/2021
A.2.1	The required documentation was presented on time, and we were satisfied that the change sponsor had met the requirements of the Process up to that point. Progress to the next step of the Process was therefore approved.	
A.3	Stage 2 DEVELOP & ASSESS Gateway	25/02/2022
A.2.1	The required documentation was presented on time and following a satisfactory completion of post-gateway actions, the change sponsor had met the requirements of the Process up to that point. Progress to the next step of the Process was therefore approved.	
A.3	Stage 3 CONSULT Gateway	27/05/2022
A.3.2	The change sponsor did not initially progress through the Stage 3 Gateway (April 22) and attempted again in May 22. Amended documentation was presented on time and, following a satisfactory completion of post-gateway actions, the change sponsor had met the requirements of the Process up to that point. Progress to the next step of the Process was therefore approved. The change sponsor submitted Step 3D Collate and Review Responses Document V1. Inconsistencies in the way in which the categorisation had been conducted were drawn to the attention of the change sponsor. The sponsor reviewed their categorisation and submitted Step 3D Collate and Review Responses Document V1.1. The CAA was satisfied that the sponsor had met the requirements of the Process up to that point.	
A.4	Stage 4 UPDATE & SUBMIT	02/11/2022

A.4.1	The change sponsor formally submitted their proposal. During the CAA document check, the change sponsor was requested to submit particular items of evidence to support their submission and to clarify several points in regard to the consultation.
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PART B – Consultation Assessment

B.1 AUDIENCE

B.1.1	Did the consultation target the right audience?	YES
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	<p>The change sponsor used the geographical area (approximately 30 Nautical Miles (NM) from Keevil) and aeronautical charts to identify stakeholders that may be affected by the proposed changes. The sponsor recognised that while the RPAS operating area between Keevil and SPTA is relatively concentrated the proposal had the potential to affect wider air users from across the region. At the consultation launch, the change sponsor targeted an aviation and non-aviation audience of 72 stakeholders:</p> <ul style="list-style-type: none"> • 24 members were represented on the National Air Traffic Management Advisory Committee (NATMAC) including the British Gliding Association (BGA) and General Aviation (GA) umbrella organisations • 34 local aviation stakeholders including local airports and airfields, gliding/paragliding clubs and air ambulances • 10 local area stakeholders including county and parish councils, and environmental organisations (Natural England and Aviation Environment Federation (AEF)) • Defence Airspace and Air Traffic Management (DAATM) – collating a joint response on behalf of 16 MOD internal stakeholders • 3 Members of Parliament (MPs) for Southwest Wiltshire, Chippenham and Devizes <p>The final stakeholder list for this ACP was annexed to the ‘Stage 4A – Consultation Review v1.1’ document (Annex A) and has been compared with that in the consultation strategy – the contents of both lists are fully aligned, and no new stakeholders were added during the consultation.</p> <p>Whilst the consultation was targeted at stakeholders mentioned above, it was conducted on the CAA’s public facing Citizen Space platform and the change sponsor used a range of communication tools, physical roadshows and dissemination of information through intermediaries (such as NATMAC members) to promote the consultation and extend it to a wider audience, including the general public.</p>
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B.1.2	Please provide a summary of responses below
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	A total of 66 responses were received over the course of the 12-week consultation; 64 responses were submitted via the online portal (Citizen Space) and 2 responses were received by email (albeit not in a form of completed feedback forms) – one response from the MOD and one response (2 separate emails) from an individual GA pilot. Out of 64 responses
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submitted via the Citizen Space, 7 were received during the ACP roadshow on 19 July and manually uploaded on the online portal.

Three emails that were received have been considered by the change sponsor as 'internal' and 'general' engagement respectively and have not been manually uploaded on to the Citizen Space nor included in sponsor's Step 3D and 4A documentation. While MOD did not indicate preference for the options and stated that, overall, the Danger Area would have little or no impact on their operations, the stakeholder provided comments against each of the options in terms of the impact. The GA pilot objected to all options as they focussed on segregation rather than integration and did not provide an online response; they believed that selecting one of the options would imply accepting the airspace change proposal. After reviewing the three emails, CAA deemed them as consultation responses.

CONDITION

1. A Consultation Review Document and a Final Submission Document must be amended to account for the responses received from the MOD and individual GA pilot. That includes statistics and analysis of those responses. For transparency purposes copies of the responses must be included in the 'Stakeholder Engagement Evidence' document. Confirmation of this action is to be provided to the CAA.

The change sponsor received further emails from Natural England and NATS stating that the stakeholders have no comments on the proposal and the sponsor classified them as engagement emails rather than as formal consultation responses. In their consultation document the change sponsor stated that stakeholders might complete the questionnaire and submit their consultation response via email, so it could be argued that those 2 responses should have also been categorised as consultation responses. Given the context of responses received from Natural England and NATS, the CAA accepts the sponsor's approach.

There were also two responses received from the same individual, and it could be argued that they could have been consolidated. The change sponsor analysed two responses and decided to keep both due to the elapsed time between two submissions and the context of the comments.

Out of 72 stakeholders that have been targeted by the change sponsor, 16 provided a response. Thus representing 22% of those stakeholders contacted directly. Responses were received from a mixed range of stakeholders, as shown in the table below:

Stakeholder type	Number of responses
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NATMAC members: Airspace4All; BGA; BMAA; British Balloon and Airship Club (Western Region) – 2 separate responses	5
Local aviation stakeholders: Avon Hang Gliding and Paragliding Club; Bath, Wilts and North Dorset Gliding Club; 2 targeted individuals of Edington Hill Airstrip, 1 targeted GA pilot	5
Local area stakeholders: Coulston Parish Council; Friends of Steeple Ashton; Keevil Parish Council; Steeple Ashton Parish Council; Wilshire Council	5
MOD via DAATM	1
Other, non-targeted organisations: Hampshire and Isle of Wight Air Ambulance	1
Individuals (NOTE: sponsor's analysis includes 2 targeted individuals of Edington Hill Airstrip in this category)	49
Total	66

The first 4 questions on the online questionnaire dealt with preliminary items including identification. Question 4 asked consultees to select whether they were responding as a local community, aviation or NATMAC organisation stakeholder. It was almost a 50/50 representation of local community (53%) and aviation stakeholders (47%) indicating strong interest from both groups.

Questions 5 and 6 asked consultees to select their overall preferred design option and to rank all the design options from the most to least preferred respectively. Overall, Option 2 Design 1 was preferred, receiving 45 responses (70.3%); stakeholders commented that this option provided the best balance in terms of environmental impact on local communities (by better facilitating multiple routes between Keevil and Salisbury Plain Training Area and thus reducing noise impacts and overflight) and minimising impact on airspace users (by minimising the volume of airspace required). Some aviation stakeholders preferred the simplicity of this option.

Option 3 Design 2 received 13 responses (20.3%). It was noted that this option was more complex to interpret and would require two NOTAM activations.

There was little support for the other two design options and stakeholder who selected those options provided no supporting comments. In their response, British Microlight Aircraft Association (BMAA) raised several conditions they would like to see as part of the approval for this ACP, one of which was that the preferred airspace structure to be either Option 3 Design 2 or Option 2 Design 1.

The following tables indicate how stakeholders ranked all 4 design options, and different stakeholder groups' preferred design options:

Options	Most preferred (1)	(2)	(3)	Least preferred (4)
Option 2, Design 1	44	10	7	3
Option 2, Design 2	3	27	14	20
Option 3, Design 1	4	8	35	17
Option 3, Design 2	13	19	8	24
Total	64*			

Options	Local Community stakeholders	Aviation stakeholders
Option 2, Design 1	29	16
Option 2, Design 2	3	-
Option 3, Design 1	-	3
Option 3, Design 2	2	11
Total	34	30

**NOTE: The MOD did not indicate preference for the options and the GA pilot objected to all four options.*

The final three questions (Questions 7, 8 and 9) provided consultees with a free text box and asked for their comments on whether there were any other airspace design options the change sponsor should consider (Q7), if there are any design amendments or potential mitigations that could be used to reduce the operational impact on other airspace users (Q8) and if there are any general considerations the sponsor should take into account to mitigate against the impact on local communities (Q9). The change sponsor received 83 comments for consideration, on average one answer to at least one of the questions per person.

There were several negative responses towards the proposal from local GA, gliding, paragliding and microlight stakeholders due to the requirement of creating a new segregated airspace in uncontrolled airspace in the area (as opposed to utilising existing nearby DAs) and due to proposed airspace dimensions/management, which in turn would impact their operations.

More on the themes and the issues raised during the consultation is in B.5.3 and B.5.4.

B.2	APPROACH	
B.2.1	Did the change sponsor consult stakeholders in a suitable way?	YES
	<p>The change sponsor conducted their consultation using the Citizen Space online portal and as a result their consultation was aligned with CAP1616 requirements. Physical meetings were held to enable stakeholders without the internet access to participate and those consultees were also given the option to request hard copies of consultation materials and to submit feedback forms by post. All stakeholders could also submit their responses via email. The postal address and email address were included within the consultation document.</p>	
B.2.2	What steps did the change sponsor take to encourage stakeholders to engage in the consultation?	
	<p>The following steps were taken to encourage participation in the consultation:</p> <ul style="list-style-type: none"> • Directly targeted stakeholders, which included those with whom the sponsor already had a working relationship with via earlier engagement, were sent a notification email on 1 June 2022 to inform them that the consultation had launched. This provided information on how consultation materials (including hard copies) can be accessed, how to respond via the online portal, email or post, and details on the consultation events. • The consultation document together with supporting material comprising: an overview of the proposed options, Frequently Asked Questions (FAQ) document, Environmental Impact Assessment (EIA) document, Electronic Conspicuity (EC) Flight Data document, Full Options Appraisal and a feedback form were available to view/complete via the Citizen Space online portal. • A reminder email was sent on 20 July 2022 (7 weeks after consultation commenced) to all stakeholders to remind them of the final virtual meeting. On 8 August 2022, just over two weeks before the end of the consultation, a final reminder email was sent to encourage responses. The mid-point email included a Microsoft Teams link, and the final reminder contained a link to the online consultation platform. • Details on the consultation and the events were publicised in/by local parish newsletters (Steeple Ashton, Keevil and Coulston) to encourage the wider public to respond. • The change sponsor held 3 physical roadshows at different locations aimed at local communities and those consultees without the internet access. Two roadshows were held at the Steeple Ashton Village Hall and 1 ACP open day was hosted at Larkhill Barracks. Multiple presentations were given throughout the day and physical copies of all consultation material were available for stakeholders, including printed copies of the feedback form for postal responses. A total of 66 members of the public attended. The change sponsor explained that no additional questions or issues were raised during the events that were outside of those within the FAQ document. 	

	<ul style="list-style-type: none"> The change sponsor also held 4 virtual meetings aimed at aviation stakeholders and NATMAC organisations. Initially the change sponsor had planned to run 3 virtual meetings, the 4th was arranged at Airspace4All's special request. There was a total of 6 attendees across 4 meetings, including BGA, BMAA, Airspace4All, Friends of Steeple Ashton and local community stakeholders. <p>Both, physical and virtual meetings, were planned on different dates and times to offer stakeholders flexibility and options to choose from. There wasn't a limit to attendance of virtual meetings, but a limited number of spaces (60) for the ACP open day.</p> <ul style="list-style-type: none"> Reminders on two physical roadshows and the first virtual sessions were published on the sponsor's social media accounts (Facebook, Twitter and Instagram pages) to promote the consultation and generate wider awareness. Posts included links to the Citizen Space. On 4 July the change sponsor gave the same presentation/brief to Keevil Parish Council, which was attended by Parish councillors and an audience from Keevil village. Consultation FAQs were embedded on the Citizen Space portal, and no changes were made to the document during consultation. <p>Evidence has been provided by the change sponsor to support the steps set out above and reviewed by the CAA.</p>	
B.2.3	Was the change sponsor required to respond to any unexpected events and/or challenges?	NO
	<p>The sponsor's consultation strategy explained how they would respond to unexpected events/challenges or lack of necessary feedback, including extension plans.</p> <p>An additional virtual meeting was held with Airspace4All, at their request, as the stakeholder was unable to attend one of the planned virtual events. While it was unexpected, it was not a challenge. There were no other unexpected events and/or challenges, so it would be fair to say that the consultation exercise went as anticipated.</p>	
B.3	MATERIALS	
B.3.1	What materials were used by the change sponsor during the consultation?	
	<p>The sponsor utilised the Citizen Space portal to create a related consultation page and to invite stakeholders to submit their feedback using the questionnaire provided. The page provided a brief explanation on where to find the consultation document and all associated materials so consultees could fully understand the proposal and explained that one of the options (using existing structures) was discounted during the Full Options Appraisal. Maps and diagrams outlining the proposed options for consultation were then included, and the FAQ document was embedded on the site.</p>	

The change sponsor also explained the purpose of the consultation and the key themes they were seeking to answer through consultation, namely – the preferred airspace option, the perceived effect of this proposal, whether positive or negative, key concerns for stakeholders and mitigating factors that could be employed to minimise impact.

The Citizen Space page clearly articulated all dates of physical roadshows and virtual meetings and details on how consultees could express interest and book a place (where applicable) and attend those.

Materials used during the consultation (and uploaded on to Citizen Space page) comprised the following:

- **Consultation Document** (main) – the contents included: background to Keevil Airfield, local airspace and local aviation stakeholders, a description of RPAS and an explanation as to why MOD was seeking to utilise Keevil to operate RPAS, and the scope for this ACP. The document described the operating principles, such as the frequency of flights and hours of operations, and emergency procedures that would apply to both options and presented the proposed two options (Option 2, simple design and Option 3, multi-sectored design) along with two designs for each of them (4 design options all together). Each of the design options included a brief description, and a clear pros and cons table. The document explained the effects of the proposed options on local communities, aviation stakeholders and the proposed impact mitigations and included a reversion statement. The last section of the document outlined the consultation process, including period of consultation and timeline of associated activities, how consultees could respond to the consultation and what would happen with the responses/next.
- **FAQs document** – one set of 21 FAQs that was aimed to supplement the consultation document. The document was split between those FAQs relevant to local communities and those relevant to aviation stakeholders. The change sponsor stated that there was no need to update the document during the consultation.
- **Full Options Appraisal (FOA), Environmental Impact Assessment (EIA) and Electronic Conspicuity (EC) Flight Data** documents – EIA document provided qualitative assessments of the environmental impacts and the sponsor’s rationale for those. EC Flight Data document provided MLAT, ADS-B and FLARM raw data collected over a 2-week period to demonstrate traffic pattern and the number of movements in the vicinity of Keevil. Both documents supplemented FOA.
- **Presentation slides** – a 27 slide PowerPoint presentation utilised at the physical and virtual events and to brief Keevil Parish Council, explaining the capabilities of the Watchkeeper RPAS, the rationale for operating from Keevil, Design Principles (DPs), the proposed options, operating procedures and impact mitigations, and some FAQs.

Additionally, the sponsor provided several links on the Citizen Space page signposting stakeholders to airspace change portal for more information on this proposal and to CAP1616. Other relevant links included links to CAP722, RA2320 and RA1600 referenced in the consultation document, should aviation stakeholders might be interested in further reading.

B.3.2	Did the materials provide stakeholders with enough information to ensure that they understood the issue(s) and potential impact(s) on them?	YES
<p>As explained in B.3.1, the consultation document clearly explained the purpose and scope of the proposal, the proposed options the change sponsor was consulting on, the effect of those options on both local communities and aviation stakeholders, and details of how the impacts would be mitigated, so that the likely impacts could be fully understood.</p> <p>The BGA made some comments about the consultation document; it highlighted that printed copies incorrectly labelled one of the options (as Option 1 Design 1 rather than Option 2 Design 1), while the online documentation was correct. In its Step 3D document, the sponsor explained that this error was identified and discussed with stakeholders at the time. It also suggested that the documentation implied that there was already ‘protective airspace’ in place rather than there being an advisory note on aviation charts relating to military parachuting activity. However, the consultation document included a clear explanation of operations at Keevil and the local airspace structure, and there is no evidence to suggest that confusion was created for other stakeholders.</p> <p>The BMAA response suggested that the ADS-B data provided in EC Flight Data document was inadequate as it was gathered for a short period of time (2 weeks) and only included MLAT, ADS-B and FLARM data. The stakeholder suggested using data from SkyDemon users to validate the conclusions made in the document.</p> <p>The change sponsor obtained a heatmap from SkyDemon users over a 2-year period to use in the Final Options Appraisal and to demonstrate traffic pattern in the vicinity of the airfield, which reaffirmed the sponsor’s original conclusion published in EC Flight Data; pilots generally avoid flying over Keevil, with most aircraft routing to the north and a minority following the railway line to the south. The sponsor added that SkyDemon had not granted their permission for the sponsor to make this data available within the public-facing documents.</p> <p>Taking the above comments in consideration, the CAA is satisfied that consultation materials were comprehensive and did not adversely affect the outcome of the consultation, explained technical aspects together with environmental and operational impacts in a way that could be understood by a reader without aviation knowledge or expertise, and provided stakeholders with enough information to enable them to make an informed decision.</p>		
B.4 LENGTH		
B.4.1	Please confirm the start/end dates and the duration of the consultation below	
Start: Wednesday 1 June 2022		

	<p>End: Monday 24 August 2022</p> <p>Duration: 12 weeks</p>	
B.4.2	If duration was less than 12 weeks, what was the justification?	N/A
	N/A	
B.4.3	Was the period of consultation proportionate?	YES
	<p>The period of consultation aligned with the CAP 1616 standard length for consultation. Consultees had been engaged at earlier stages in the CAP 1616 process and so the proposals were already familiar to them.</p> <p>The consultation fell over the summer school holiday, which the sponsor was aware of and accounted for by proposing to conduct a full 12-week consultation. In addition, the sponsor had contingency plans in place if it was deemed that the consultation was not providing consultees with sufficient opportunity to respond.</p> <p>Given the scale and impact of this ACP, informed audience and the sponsor's approach to the consultation, the CAA deemed that the duration of consultation was appropriate/proportionate and approved it at Stage 3 gateway assessment meeting. No stakeholders raised concerns about the duration of the consultation.</p>	
B.5	GENERAL	
B.5.1	Was the conduct of the consultation aligned with the consultation strategy?	PARTIALLY
	<p>For the most part, the conduct of the consultation was aligned with the consultation strategy that was approved at the Stage 3 CONSULT Gateway;</p> <ul style="list-style-type: none"> Majority of physical and virtual events were publicised / reminded of on the sponsor's social media accounts (Facebook, Twitter and Instagram pages) to promote the consultation. One of the physical events, ACP Open Day hosted at Larkhill Barracks, wasn't publicised. It may not necessarily be attributed to the lack of promotion, but numbers of those attended was half of numbers of stakeholders that attended the other two events. The change sponsor did not utilise social media to remind of the consultation closing date two weeks before the end of the consultation, as they planned in the consultation strategy. Given that the last two weeks of the consultation were over a school summer break, it would've been beneficial to utilise the social media, along with the email reminder that the sponsor had sent, to remind stakeholders of the consultation and encourage them to respond. One of the promotional activities, namely adverts in the Wiltshire Times newspaper, was not undertaken as planned. The change sponsor explained that, after further consideration, it was deemed that the newspaper served too wide of a catchment area. The change sponsor added that it was evidenced through previous engagement that the audience interested in and/or impacted by 	

	<p>the proposal was localised, therefore the sponsor decided that the focus should be on ensuring maximum reach through local publications.</p> <ul style="list-style-type: none"> The consultation strategy also included a planned briefing to the local gliding community, as <i>“a result of their proactive engagement and feedback so far and the potential impact on their operations”</i>. No such briefing is referred to in the final submission, so it is unclear whether this took place or why, if not, it was not considered necessary. However, both the British Gliding Association and the Bath, Wilts and North Dorset Gliding Club responded to the consultation. <p>While the sponsor’s conduct of the consultation did not entirely align with the consultation strategy, there is no evidence to suggest that this adversely impacted the outcome of the consultation. Publicising that the end of the consultation period was approaching via social media, as planned, may have resulted in some additional responses. However, the sponsor achieved a reasonable response rate and received responses from a mixed range of stakeholders which, taking into account the scale and impact of this ACP, provided sufficient information for the sponsor to understand the potential impacts of the proposal on its stakeholders.</p>	
B.5.2	Has the change sponsor categorised the responses in accordance with CAP 1616?	YES
	<p>The way in which the Step 3D categorisation had been initially conducted required an explanation from the change sponsor and several inconsistencies were drawn to their attention. The sponsor added an explanatory note on their approach to categorisation of responses, whereby all responses were initially split into those that had the <i>potential</i> to impact the final proposal (either in terms of the design or management of the airspace) and those which did not.</p> <p>Responses that might impact the proposal were then assessed whether they would require changes to the submission or had already been considered and discounted earlier in the process and would not require changes to the proposal, and further sub-categorised as follows:</p> <ul style="list-style-type: none"> <i>Impacted. A proposal from a stakeholder that would impact the management of the airspace or alter the size, shape or construct of the final design that has not already been considered.</i> <i>Not impacted. A proposal from a stakeholder that would impact the management of the airspace or alter the size, shape or construct of the final design but has already been considered, discounted or implemented at an earlier stage of this ACP.</i> <p>All responses (11) categorised as <i>‘Impacted’</i> were progressed to Step 4A for consideration. The sponsor provided responses to all comments received, regardless of the response categorisation, to demonstrate how stakeholders’ feedback has been considered.</p> <p>The change sponsor reviewed inconsistencies in their categorisation of responses and submitted ‘Step 3D Collate and Review Responses’ document V1.1. The CAA was satisfied that the updated categorisation had been conducted fairly and in accordance with Appendix C,</p>	

	Table C2.	
B.5.3	Has the change sponsor correctly identified all of the issues raised during the consultation and accurately captured them in the consultation response document?	PARTIALLY
	<p>After reviewing the raw consultation responses (downloaded from Citizen Space), the CAA is satisfied that, overall, the sponsor has correctly identified and accurately captured the issues/considerations raised by consultees in their 'Stage 4 Consultation Review v1.1' consultation response document. The change sponsor grouped those into the following themes:</p> <ol style="list-style-type: none"> 1. Use a Transponder Mandatory Zone (TMZ), as opposed to Danger Area, as an alternative option. 2. Suggested amendments to airspace design 3. Considerations to airspace management in terms of notification of activation, provision of new dynamic airspace, access to DA operating hours and provision of DACS/Danger Area Activity Information Service (DAAIS) 4. Use of EC Flight Data as part of the FOA (see B.3.2 on this particular point) 5. Noise Abatement procedures 6. Choice of location (basing), i.e. Keevil Airfield, for operating the Watchkeeper <p>Both, the British Gliding Association and Bath, Wilts and North Dorset Gliding Club, raised specific concerns about the potential for a 'funneling effect' to the north of Keevil, which the BGA suggested 'will have a significant negative impact on safety'. This issue has not been clearly captured in the sponsor's consultation review document. However, the sponsor conducted further analysis of aircraft behaviour and airspace usage (including using data from the BGA) and responded to the issue in both, its Full Options Appraisal and final submission.</p> <p>Summaries of the issues/considerations raised during consultation are high level in places and it would be beneficial for the sponsor to expand on. Alternatively, it is recommended that 'Step 3D Collate and Review Responses' document V1.1 is read alongside the consultation response document.</p> <p>RECOMMENDATION</p> <ol style="list-style-type: none"> 1. The change sponsor should expand on/add more detail on the issues/considerations raised during the consultation in their 'Stage 4 Consultation Review v1.1' consultation response document. 	
B.5.4	Does the consultation response document detail the change sponsor's response to the identified issues?	YES
	The consultation response document outlines the change sponsor's response to the identified issues with the final details, where	

relevant, included in the formal submission '[ACP-2021-006 Keevil Danger Area Airspace Change Proposal Final Submission v1.1](#)'. It is therefore recommended that the consultation response document is read alongside the formal submission document.

Use of a Transponder Mandatory Zone (TMZ), as opposed to Danger Area, as an alternative option

Some stakeholders suggested that either a TMZ or an ADS-B/transponder zone should be considered as it would allow free access to suitably equipped GA aircraft.

Response: The change sponsor considered using a TMZ (as well as other classes of airspace) during Stage 2. The use of TMZ was discounted due to inability to provide the required segregation in accordance with current policy (MAA Regulatory Article 2320).

Suggested amendments to airspace design – vertical limits

Gliding/paragliding/microlight stakeholders questioned the need for the vertical limit to be as high as 3,500ft and suggested reducing the vertical limits of the Option 3 Design 2; BGA believed that routine operations would require 2500ft or less and requested that whenever operationally acceptable DA to be activated at that altitude or less. BMAA requested even lower vertical cap of 2000ft and recommended that reconsideration of the height for the Danger Area should be one of the (several) conditions to approve this ACP. Avon Hang Gliding & Paragliding Club suggested lowering the base (from 1500ft to 1000ft or even 750ft) and the ceiling (from 3500ft to 2500/2000ft) of the transit corridor and, if possible, to lower the ceiling of the main cylinder closest to the transit corridor to match.

Response: in the consultation response document the sponsor explained that they would consider lowering the vertical limits as part of the Final Options Appraisal and only if safe operation wouldn't be impacted by doing so. The change sponsor also added that a balance must be struck between unnecessarily high transit (impacting airspace users) and unreasonably low flying (impacting local communities), while still facilitating MOD requirements.

Suggested amendments to airspace design – lateral dimensions

Additional comments included suggestions such as shifting the design to the east/northeast; keeping airspace free to the north of the airfield; replacing circular design options with just a corridor between Keevil and SPTA (hot air balloon stakeholders); and creating a smaller structure (i.e. smaller diameter circle and narrower corridor) to keep airspace volume to a minimum and as open as possible. Conversely, Steeple Ashton Parish Council suggested that keeping the connection with SPTA as wide as possible would minimise the impact on local villages by enabling multiple flying routes.

Response: The change sponsor explained that a small corridor only would not facilitate a circuit pattern, nor would it allow for multiple transit routes and hold locations to minimise overflight, and Option 2 Design 1 is already the minimum required for RPAS operations while keeping airspace to the north free.

Considerations to airspace management – notification of activation & access to DA

Gliding/paragliding/microlight stakeholders suggested using a dedicated ATIS frequency as more flexible method of notifying air users of the real-time information on the activity status of the DA, thus negating the need to call London or Boscombe Down for DAAIS or DACS respectively and being able to transit in the event of the DA being inactive. Stakeholders believed that radio contact for a DA crossing or entry was inadequate for the TDA operations in summer 2021. BMAA's other requested condition was a provision of fully resourced DACS at all times.

Stakeholders also added, based on the TDA operations, that activation by NOTAM (Notice to Aviation) won't be an effective method of ensuring equitable access to airspace; stakeholders believed that the airspace was NOTAM'd active when Watchkeeper operations did not take place. A strong preference would be for the TDA to be switched off as soon as Watchkeeper is clear of the area and a request was raised to provide transit permissions for EC aircraft as part of this proposal.

Response: In the consultation response document the sponsor committed to investigate the viability of an ATIS frequency and whether it would provide a benefit and included the outcome in its Final Options Appraisal document. It concluded that the value brought by a different source, providing the same information that would be provided by a DAAIS, does not outweigh the confusion that additional published frequencies may cause. It encouraged pilots that have difficulties accessing the airspace, if approved, to file a FCS1522 'UK Airspace Access or Refusal of ATS Report' form.

The sponsor also explained that currently airspace is required to be activated for the whole period in which it may be used and cannot be dynamically switched on/off. NOTAMs will be utilised to ensure the airspace is only used when required and DACS will be provided.

Considerations to airspace management – operating hours

To minimise impact on their operations, Air Hot Balloon stakeholders suggested that the airspace should not be activated during early mornings/evenings, and that operating hours are proportionate to military objectives while reducing impact on other airspace users. A couple of other stakeholders requested that the airspace is activated for the minimum amount of time.

Response: Hours of operation will be limited to only what is required and promulgated via NOTAM with details being finalised in the final submission. The sponsor also added that the proposed hours of operation during the working week will limit the effect on hot air balloons.

Overall impact on hang-gliding and paragliding

The Avon Hang-gliding and Paragliding Club, as well as a number of individuals, raised concerns about the impacts of the proposal on established flying sites at Westbury White Horse and Bratton Camp as well as on cross-country flying. Specific issues raised were about the volume of airspace being disproportionate to the stated operational requirement, excessive activation periods, the wish to maintain the ability to undertake cross-country flights, the potential funnelling of aircraft at low level in the vicinity of the flying sites. The club suggested that both Option 2 designs would significantly curtail local flying at Bratton Camp, and that the negative impact could be

significantly reduced with some modifications to either of the Option 3 designs.

Response: The significant concerns of the hang-gliding and paragliding communities about the potential impacts on their flying sites was recognised by the sponsor; post-consultation the change sponsor engaged with the Avon Hang-Gliding and Paragliding Club secretary in order to discuss the detail of the draft amendments to the Letter of Agreement (LoA) with the aim of minimising disruption to civilian hang-gliding and paragliding while the proposed new Danger Area is active. A draft of the LoA has been included in the submission.

Overall impact on gliding activity

Bath, Wilts and North Dorset Gliding Club raised concerns that the proposal would result in funnelling of traffic to the north of Keevil, and that this would increase the collision and out-landing risk to glider pilots, as well as meaning gliders would have to fly further north on cross-country flights from the Westbury area, adding track miles and bringing gliders closer to built up areas. It also raised concerns about novice pilots being unable to by-pass Keevil to the south, which could be mitigated by radio contact for more experienced pilots but would add significant workload for novice pilots. Its experience with the previous TDA gave it little confidence that DA crossings would be granted, and it would need strong assurances that crossings would be easily granted except when the Watchkeeper is actively using the Keevil DA.

The British Gliding Association noted that as well as the impact on local gliding sites that the sponsor identified in its consultation material, there were far larger numbers of gliders based at other sites within easy cross-county range that would also be impacted, and avoiding Keevil would create a 'funnelling effect' that would have a significant negative impact on safety. The BGA offered to provide a heat map of supplied logged flights to help understand the scale of the issue. It also echoed concerns about excess activation and that obtaining access to the airspace via clearance from Boscombe DACS is impractical for most glider pilots.

Response: The sponsor did not respond to the gliding community's concerns directly in its consultation review document but did state that it would conduct further airspace use trend analysis in its Final Options Appraisal to better understand current aircraft behaviour and airspace usage, building on what it had already presented in the consultation document. Sources used in the analysis included data from the BGA as well as Electronic Conspicuity data, heatmaps from Airspace4All and SkyDemon and Airprox data from the UK Airprox Board. The final proposal did consider the specific impacts on local gliding communities.

The BGA data showed that the majority of glider flights took place at the weekend (when the proposed DA will not be active), and that those gliders that did overfly Keevil on weekdays did so at altitudes between 3,100ft and 4,475ft. The sponsor acknowledged that the data was not comprehensive but considered that it was indicative of the altitude that gliders operate when flying cross country. It concluded that a Danger Area with a vertical ceiling of 3,200 ft AMSL would therefore have a low impact on cross-country gliding, which would be further mitigated by the provision of a DACS.

Overall, the sponsor's analysis of all the data sources demonstrated that currently most aircraft avoid routing overhead Keevil (which is noted on aviation charts as a glider site and a parachuting drop zone), and that the 'gap' between Keevil and the boundary of the Salisbury Plain Training Area Danger Area complex is not widely used with most aircraft choosing to route north instead. The sponsor

concluded that the proposal would not, therefore, significantly change current behaviour as long as any airspace to the north or west of Keevil is minimised and the ceiling is similar to the existing navigation warnings, and the provision of a DACS would allow aircraft to choose to route through the airspace when active.

Considerations to airspace management – priority access and deconfliction procedures with HEMS operators

Hampshire and Isle of Wight Air Ambulance requested for the emergency services to safely transit and operate within the airspace.

Response: The sponsor committed to expand the LoA with Wiltshire Air Ambulance to include all HEMS/NPAS in the region and for the LoA to cover priority access, deconfliction procedures, and means of communications between the parties.

Considerations to airspace management – access to/from DA from/to Edington Farm Strip

Edington Hill Farm Strip is a private grass strip located to the south of Keevil within the boundary of the existing Danger Area D123. The owner of the strip and another pilot based there provided feedback related to the lines of communication with Boscombe Down ATC that would be required to facilitate use of the airstrip at all times, citing difficulties communicating with controllers at Boscombe Down when the previous TDA was in place. It was also explained that Electronic Conspicuity (ADS-B in and out) is used on both aircraft hangared at Edington Hill, and when the TDA was active the pilots were able to monitor the position of the RPAS while on approach into their runway, and it would aid integration if they could report that they have the drone visual on EC and were maintaining separation.

Response: The change sponsor committed to update the existing LoA with Boscombe Down to better integrate Edington Hill Farm Strip and improve communications between the parties.

Noise abatement procedures

While the majority of responses received from local community were either in support or neutral, there were some concerns around noise impact. Several stakeholders suggested using departure and arrival procedures that would minimise transit and holding of Watchkeeper, overflight of the same location and low flying in the vicinity of Keevil. Six stakeholders expressed support for Option 2 Design 1, as they deemed it to be the most beneficial in terms of environmental impact on residents while minimising impact on other airspace users. One response suggested that air pollution should be taken into account as well as noise pollution.

Response: The change sponsor explained that all designs have been developed to facilitate multiple transit routes and hold locations to minimise overflight of the same areas. From a CAP1616 perspective, as an MOD sponsor, the change sponsor is exempt from assessing the noise impact of their own operations and regulatory assessment of specific noise abatement procedures out of scope for this ACP. However, as part of the Environmental Impact Assessment, the sponsor has assessed the anticipated noise impact of the consequential changes on other airspace users due to their proposal, which was concluded to be negligible.

Basing

	<p>Three stakeholders commented on and/or questioned the justification to use Keevil for operating Watchkeeper – one suggested to base operations in Boscombe Down, one to use the existing Danger Area and the other suggested to move operations to Netheravon/Upavon, thus removing the need for this ACP. This was a reoccurring theme in all stages of the process.</p> <p><u>Response:</u> The change sponsor explained that the requirement to use Keevil airfield is articulated in the Statement of Need and is outside of scope for the ACP. Alternative locations like Boscombe Down, Upavon, Netheravon and Deptford Down have been discounted either due to existing operations or runway limitations.</p> <p>Safety of Watchkeeper platform</p> <p>Two general aviation stakeholders raised concerns about the safety record of the Watchkeeper platform, and one suggested that its activities should be wholly contained within the existing SPTA Danger Area complex.</p> <p><u>Response:</u> All military aircraft operate in accordance with a Release to Service and safety assessments are conducted for each flying location to ensure any risk are kept as low as reasonably practicable. The safety risk associated with the operation of specific aircraft is outside of the scope of the ACP.</p> <p>The sponsor derived a list of 4 major actions in order to respond to the outlined issues and to address impact on airspace users:</p> <ol style="list-style-type: none"> 1. Creation of a LoA with Wiltshire Air Ambulance, extended to other HEMS providers. 2. Amendment of extant LoAs with Edington Hill Farm Strip and Avon Hang Gliding and Paragliding Club. 3. Consideration to use a dedicated ATIS frequency to provide the real-time information on the activity status of the DA. 4. Assessment as to whether the vertical limits could be reduced to minimise disruption to air users whilst still facilitating MOD requirements. 	
B.5.5	Is the change sponsor’s response to the issues raised appropriate/adequate?	YES
	<p>To address the first two actions, three LoAs arose out of consultation with local HEMS operators (including Hampshire and Isle of Wight Air Ambulance, Wiltshire Air Ambulance, the Dorset and Somerset Air Ambulance and Great Western Air Ambulances); Avon Hang Gliding and Paragliding Club, and Edington Hill Farm Strip, to mitigate the impacts to their operations (draft copies have been submitted to the CAA).</p> <p>Another existing LoA between Salisbury Plain Training Area, MOD Boscombe Down and Joint Helicopter Command was amended to allow for a provision of DACS. Please refer to CAA Operational Assessment for technical information/appropriateness of the content of the</p>	

proposed LoAs.

CONDITION

2. All Letters of Agreements to be finalised, agreed, and signed prior to implementation.

The final submission states that the ceiling of Option 2 Design 1 has been lowered to 3,200ft AMSL and will coincide with that of the Glider Site to reduce impact to aircraft wishing to transit over it. The sponsor assessed that this would have a negligible impact on the majority of airspace users.

After investigating the suggestion to use a dedicated ATIS frequency as more flexible method of notifying airspace users of the real-time information on the activity status of the DA, the change sponsor discounted it. The sponsor explained that the suggestion was discounted in order to keep operating procedures as simple as possible for both, airspace users and Boscombe Down ATC. Instead, when Danger Area is active, Boscombe Down will provide DACS. DACS may be denied during periods of RPAS departure and recovery, but will be available when RPAS in in D123. At other times, London Information will provide DAAIS.

In the consultation response document, the change sponsor explained that hours of operation would be finalised in the final submission, which indeed states that the Danger Area for RPAS operations only (gliding, rotary-wing and fixed wing activities will not require the use of the DA, as per current practices) will be predominantly used:

- between May – September during the working week only;
- Mon-Thu between 0830-1730 and on Friday 0830-1430;
- Only when Boscombe Down is open so DACS is available;
- 1-2 RPAS movement per day; RPAS departure to SPTA predominantly in the morning with recovery in late afternoon;
- Anticipated that DA would be activated for 3-6 weeks at a time, and only NOTAM'd for the least amount of time possible.

Option2 Design 2 and Option 3 (both designs) were discounted due to either containing airspace not required for RPAS operations (north of Keevil), or due to assessed increased risk of Mid-Air Collision (MAC) and airspace infringements as a result of a very small transit gap and/or lack of EC devices and/or radios.

The sponsor's response to the issues raised is appropriate.

B.5.6	Is the formal airspace change proposal aligned with the conclusions of the consultation response document?	YES
	<p>Yes, the sponsor's Step 3D and 4A documentation have been cross checked with their formal airspace change proposal 'ACP-2021-006 Keevil Danger Area Airspace Change Proposal Final Submission v1.1'; the change sponsor is progressing Option 2 Design 1, simple design, with proposed changes made to vertical limits as a result of the responses to the consultation – the ceiling has been reduced to 3,200ft AMSL. The Danger Area extends south to intercept SPTA D123 and the airspace to the north of Keevil has been kept to the absolute minimum, discounting the use of runway 01/19 to reduce any funnelling effect for aircraft transits around the airfield.</p> <p>This option was the sponsor's preferred options, it was supported by 70.3% of respondents and it balances all stakeholders' interests. Provision of DACS and specific LoAs will further reduce the impact on airspace users.</p> <p>Revision to the design does not fundamentally alter the proposal consulted on and therefore there is no requirement for the sponsor to reconsult, as per Para 200, CAP1616.</p>	
B.5.7	Public Evidence Session Summary	N/A
	A Public Evidence Session was not required for this proposal as this ACP has been categorised as a Level M1 change.	
B.6	RECOMMENDATIONS/CONDITIONS/PIR DATA REQUIREMENTS	
B.6.1	Are there any Recommendations which the change sponsor should try to address either before or after implementation (if approved)? If yes, please list them below.	YES
	<p><i>GUIDANCE NOTE:</i> Recommendations are something that the change sponsor should try to address either before or after implementation, if indeed the airspace change proposal is approved. They may relate to an area in which the change sponsor is reliant upon a third party to actually come to an agreement and consequently they do not carry the same 'weight' as a Condition.</p> <ol style="list-style-type: none"> The change sponsor should expand on/add more detail on the issues/considerations raised during the consultation in the 'Stage 4 Consultation Review v1.1' consultation response document. The change sponsor should inform the stakeholders of the decision (when published) and next steps. 	
B.6.2	Are there any Condition(s) which the change sponsor must fulfil either before or after implementation (if approved)? If yes, please list them below.	YES

	<p><u>GUIDANCE NOTE:</u> Conditions are something that the change sponsor <u>must fulfil</u> either before or after implementation, if indeed the airspace change proposal is approved. If their proposal is approved, change sponsors <u>must</u> observe any condition(s) contained within the regulatory decision; failure to do so <u>will usually</u> result in the approval being revoked. Conditions should specify the consequence of failing to meet that condition, whether that be revoking the ACP or some alternative.</p> <ol style="list-style-type: none"> 1. A Consultation Review Document and a Final Submission Document must be amended to account for the responses received from the MOD and individual GA pilot. That includes statistics and analysis of those responses. For transparency purposes copies of the responses must be included in 'Stakeholder Engagement Evidence' document. Confirmation of this action is to be provided to the CAA. 2. All Letters of Agreement to be finalised, agreed, and signed prior to implementation. 	
B.6.3	Are there any specific requirements in terms of the data to be collected by the change sponsor for the Post Implementation Review (if approved)? If yes, please list them below.	NO
	<p><u>GUIDANCE NOTE:</u> PIR data requirements concerns any specific data which the change sponsor should be instructed to collate post-implementation, if indeed the airspace change proposal is approved. Please use this section to list any such requirements so that they can be captured in the regulatory decision accordingly.</p> <p><u>STAKEHOLDER OBSERVATIONS</u></p> <p>The change sponsor is required to collate related stakeholder observations (enquiry/complaint data) and present it to the CAA. Any location/area from where more than 10 individuals have made enquiries/complaints must be plotted on separate maps displaying a representative sample of:</p> <ul style="list-style-type: none"> • aircraft track data plots; and • traffic density plots <p>The plots should include a typical days-worth of movements from the last month of each standard calendar quarter (March, June, September, December) from each of the years directly preceding and following implementation of the airspace change proposal.</p>	

PART C – Consultation Assessment Conclusion(s)

C.1	Does the consultation meet the CAA’s regulatory requirements, the Government’s guidance principles for consultation and the Secretary of State’s Air Navigation Guidance?	YES
	<p>The fundamental principles of effective consultation are targeting the right audience, communicating in a way that suits them, and giving them the tools to make informative, valuable contributions to the proposals development. I am satisfied that these principles have been applied by the change sponsor before, during and after the consultation. I am also satisfied that the change sponsor has conducted this consultation in accordance with the requirements of CAP 1616, that they have demonstrated the Government’s consultation principles and that the consultation has:</p> <ul style="list-style-type: none"> • Taken place when the proposal was at a formative stage – evidenced by the consultation document which proposed different possible options to achieve the need of the proposal, seeking the view of stakeholders on those different options and how any impact could be mitigated. This Gunning principle is also evidenced by the revisions made by the sponsor to their final airspace design on account of stakeholder feedback. • Presented the consultation material clearly and outlined the potential impacts that needed to be considered – evidenced by the consultation documentation written in way that could be understood by a reader without aviation knowledge or expertise, it clearly explained the purpose of the proposal, the local context, and the proposed options and the pros and cons of each. The effects of the proposed options on both local communities and aviation stakeholders were explained so that the likely impacts could be fully understood, along with details of how those impacts would be mitigated. • Provided a sufficient timeframe to allow considered responses – evidenced by a consultation duration of 12 weeks, which is the accepted standard for consultation length outlined in CAP 1616. Considering that the consultees were already familiar with the proposals, having been engaged at earlier stages in CAP1616 process and during the TDA in summer 2021, the duration was proportionate and appropriate for this proposal. • Taken into account the product of the consultation – evidenced by the sponsor correctly identifying and accurately capturing the issues raised by the consultees and revisions made to the final airspace design on account of stakeholder feedback; the change has reduced the ceiling of the proposed Danger Area and took further steps to mitigate the impacts on stakeholders by entering into Letters of Agreement with local stakeholders and the provision of a DACS. The change sponsor is progressing the most supported option. 	

Level 1 ACP

PART D – Consultation Assessment sign-off			
	Name	Signature	Date
Consultation assessment completed by Airspace Regulator (Engagement and Consultation)	[REDACTED]	[REDACTED]	30/01/2023
Consultation assessment approved by Manager Airspace Regulation	[REDACTED]	[REDACTED]	20/2/2023
Consultation assessment conclusions approved by Head AAA or GD SARG	[REDACTED]	[REDACTED]	23/3/2023