

# CAA Operational 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	7 Dec 22 (Formal Submission V1.1)
Case study report as at	10 Feb 23
<p><i>Instructions</i></p> <p>In providing a response for each question, please ensure that the 'status' column is completed using the following options:</p> <ul style="list-style-type: none"> <li>• YES</li> <li>• NO</li> <li>• PARTIALLY</li> <li>• N/A</li> </ul> <p>To aid the SARG Lead it may be useful that each question is also highlighted accordingly to illustrate what is:</p> <p>resolved <span style="background-color: #90EE90; padding: 2px;">YES</span> not resolved <span style="background-color: #FFD700; padding: 2px;">PARTIALLY</span> not compliant <span style="background-color: #FF6347; padding: 2px;">NO</span></p>	

## Executive Summary

The Ministry of Defence (the Change Sponsor) is seeking to establish a Danger Area to facilitate Beyond Visual Line of Sight flying of Remotely Piloted Air Systems between Keevil Airfield and the existing Danger Areas of Salisbury Plain Training Area. Keevil Airfield is an MOD site located to the northwest of the Salisbury Plain Training Area and is currently a satellite aerodrome of RAF Brize Norton (although this is changing in the near future). The airfield has limited infrastructure and airfield facilities but remains an active site for military and civilian activities such as gliding, military para-dropping, troop air assault tactical insertions and ground manoeuvres in support of exercises on Salisbury Plain. This includes use as a tactical landing zone and drop zone for RAF Air Transport aircraft as well as a technical and tactical training location for rotary-wing assets from the Joint Helicopter Command and the Army Aviation Centre, Middle Wallop. The airfield is home to the Bannerdown Gliding Club (a member of the Royal Air Force Gliding and Soaring Association) who fly a variety of sailplanes and towing aircraft for recreational purposes. Bannerdown Gliding Club primarily occupy Keevil at weekends but also host gliding competitions at other times throughout the year. The Wessex Model Flying Club use Keevil for model aircraft flying but move elsewhere when military activities are taking place.

Keevil is currently used day and night by military helicopters. Before 2018 RAF air transport aircraft utilised the airfield approximately 15-20 times per year but have since reduced their activities at Keevil; it is anticipated that use by RAF air transport aircraft will return to these numbers over the next 2 years.

Despite this mixed aviation activity, Keevil is not published in the Military Aeronautical Information Publication (AIP) and no drone Flight Restriction Zones/Runway Protection Zones are established; however, gliding and parachute activities at the airfield are notified in the UK AIP under ENR5.5 Aerial Sporting and Recreational Activities.

<b>KEEVIL GLIDER SITE, WILTS (AD) (W &amp; T)</b> 511850N 0020643W	Upper limit: 3000 FT AGL Lower limit: SFC	Phone: Bannerdown Gliding Club 01380- 870411.	Site elevation: 200 FT AMSL.  Hours: HJ
<b>KEEVIL PARACHUTE SITE, WILTS</b> A circle, 2 NM radius, centred at 511851N 0020637W	Upper limit: FL150 Lower limit: SFC	Phone: Opr/User - Various. Brize Norton ATC: 01993- 895521/896814/896804.	Airfield used for gliding, free-fall parachuting and heavy supply drops from military Hercules aircraft. Supply drops may take place at any time within 2 NM and below 2000 FT.  Hours: Activated by NOTAM.

Additionally, Keevil is currently annotated on VFR aeronautical charts with a note regarding military activities:

**NOTE 4. KEEVIL AERODROME (511850N 0020643W). In addition to use as a Glider Launching Site, Keevil is used extensively as a Military Dropping Zone. Pilots are advised to avoid the aerodrome at all times by 2NM laterally and 2000ft AAL vertically (elevation 200ft AMSL).**

The local area is popular with General Aviation (GA) traffic and is used frequently by aircraft routing around the existing Salisbury Plain Danger Areas and the Bristol airport Controlled Airspace (Class D). A number of small private airstrips, microlight sites and glider sites exist close to Keevil, including the Avon Hang Gliding and Paragliding Club that already has an agreement with the MOD for access to airspace associated with the Salisbury Plain Training Area. Similar access arrangements have been agreed to extend this access to the proposed new Danger Area to reduce the impact on the gliding and paragliding club at times when the MOD operator can accept some limitations in their operating area.

The Wiltshire Air Ambulance operates from a Helicopter Landing Site at Semington, approximately 2.5NM north of Keevil. Given the proximity to the northern edge of the proposed new Danger Area, the Change Sponsor has identified a need to facilitate access to HEMS operators as much as possible. The proposal includes the provision of a Danger Area Crossing Service (DACS) but this may not immediately be available to HEMS pilots at low altitudes on take-off. Therefore a new Letter of Agreement has been drafted to provide alternative means of access at short notice that includes direct contact with the operator of the BVLOS aircraft. Part of this provides a means for HEMS pilots to access the Danger Area taking visual separation on the BVLOS aircraft – this requires further consideration by the CAA as no safety case material has been provided as part of the proposal and may require consideration of current regulations and policies.

The proposed Keevil Danger Area is expected to facilitate:

- Departures into and recoveries from the nearest existing Salisbury Plain Danger Area (EGD123 Imber) in order to conduct military RPAS training.
- Occasional circuit training for pilot currency requirements.
- Emergency recovery of the RPAS from Salisbury Plain Training Area to Keevil Airfield.

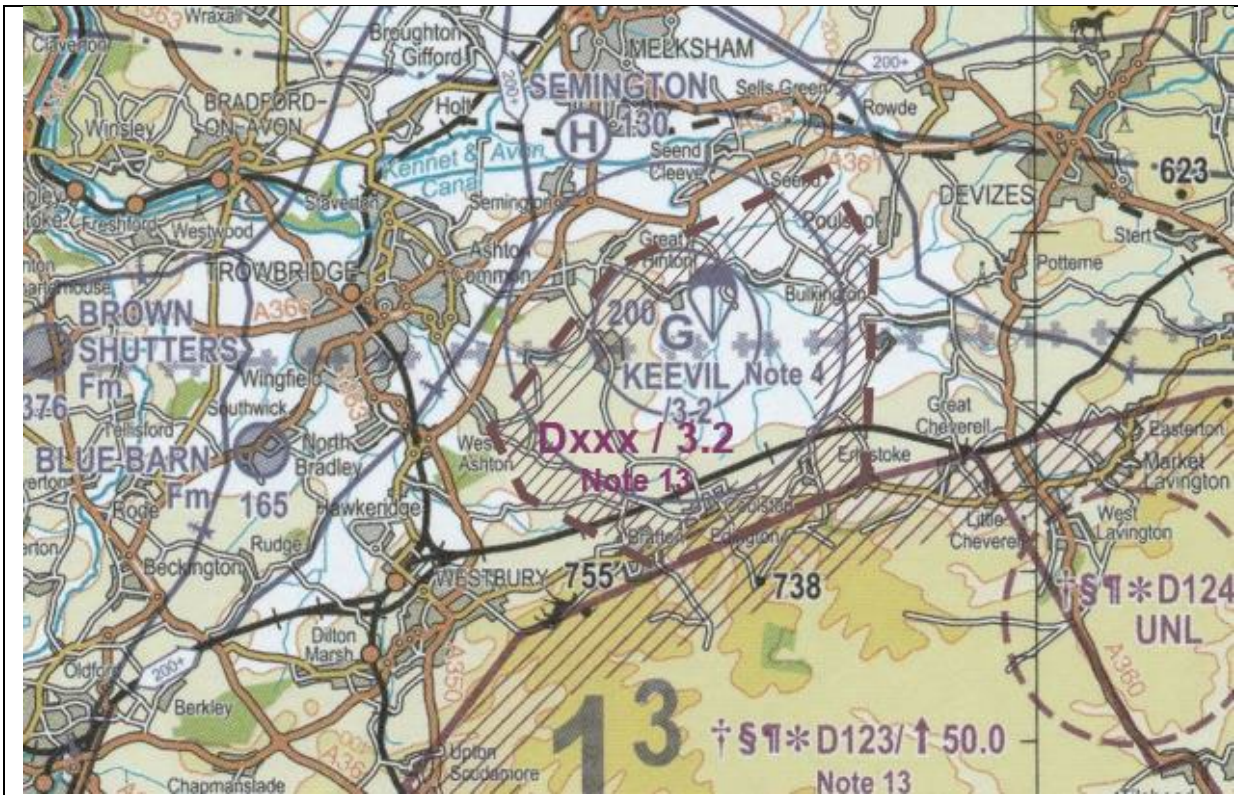
The proposed Danger Area consists of:

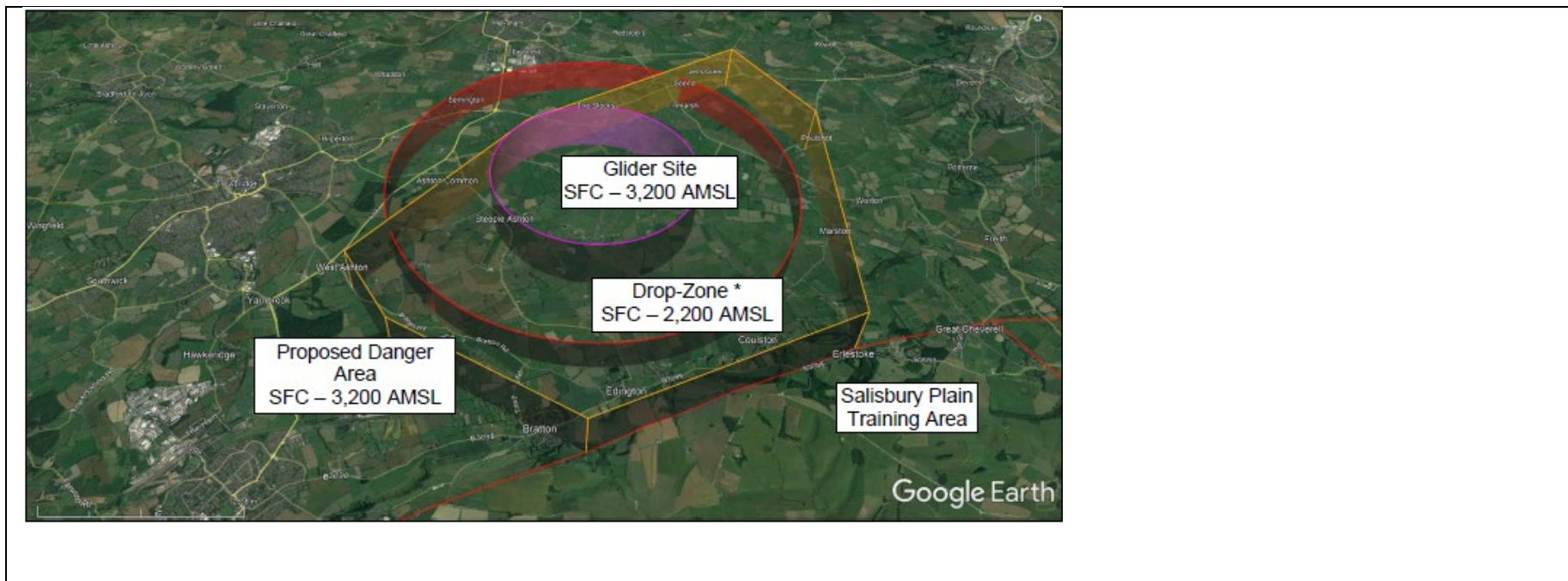
- A single structure, surface to 3,200ft AMSL.
- A 4.9 Nautical Mile wide area, orientated in line with runway 06/24.
- The Danger Area extends south (approximate width 3.5NM) to intercept EGD123, their primary operating area for RPAS.
- The airspace to the north of Keevil has been reduced to the minimum required, discounting use of the secondary runway.

To further mitigate any potential impact on other airspace users, the Change Sponsor is proposing the provision of a Danger Area Crossing Service (DACS) via MOD Boscombe Down ATC, established through the amendment of an existing Letter of Agreement. The Danger Area will not be activated unless a DACS is available. A Danger Area Activity Information Service (DAAIS) is proposed from London Information, although there is no evidence of this agreement having been confirmed formally.

Although the Change Sponsor is not in a position to define exact operating periods as this will be determined by their operational training requirements, they have been clear in providing an indication of likely activations. The Danger Area will be activated by NOTAM only when required, which is nominally likely to be Mon-Fri in daylight hours for periods of 3-6 weeks at a time, mostly across the summer period (May-September). There are expected to be one or two aircraft sorties a day, with only occasional use of the Keevil airfield for training circuits. This is likely to leave a significant period of time for other airspace users to cross the Danger Area via DACS. The Danger Area is required to remain active whilst BVLOS aircraft are airborne due to the potential need to recover the aircraft to Keevil in the event of an emergency.

The [CAA Policy for Permanently Established Danger Areas and Temporary Danger Areas](#) places a number of obligations regarding the management of the airspace structure on the Danger Area Authority, including ensuring the safe and efficient use of the airspace. The MOD has nominated Joint Helicopter Command HQ as the DAA for this proposed new Danger Area; as they are not currently DAA to any other Danger Areas there will be a requirement to ensure that they are aware of their responsibilities. Additionally, the running of the aerodrome will be transitioning from RAF Brize Norton to the Army Aviation Centre (Middle Wallop).





1.	Justification for change and options analysis (operational/technical)	Status
1.1	Is the explanation of the proposed change clear and understood?	YES
	A single Danger Area approximately 4.9NM x 3.5NM, from surface to 3200 feet above mean sea level, linking to the Imber Danger Area EGD123 (part of the Salisbury Plain Training Area (SPTA) complex), activated by NOTAM.	
1.2	Are the reasons for the change stated and acceptable?	YES
	MOD requirement to operate Remotely Piloted Air Systems from Keevil to/from the SPTA Danger Areas. Due to current CAA and MAA requirements, Beyond Visual Line of Sight activities require a suitable degree of segregation from other airspace users.	
1.3	Have all appropriate alternative options been considered, including the 'do nothing' option?	YES
	In Stage 2 the Change Sponsor started to consider how the existing airspace 'structures' might enable the BVLOS activity; however, the CAA explained in a <a href="#">letter</a> that the glider site and drop zone notifications in the AIP are not deemed to be airspace structures that imply any restrictions, reservations, or conditions for entry. In addition, they do not authorise any specific activity or imply any rights to a specific airspace user. Whilst there is a significant amount of work being undertaken to develop a UK approach for improved integration of BVLOS activities, this is not yet mature enough to meet the requirements of this ACP; danger areas are a current accepted means of meeting the requirements of civil and military regulations to enable BVLOS activities.	
1.4	Is the justification for the selection of the proposed option sound and acceptable?	YES
	Minimal size necessary, activated only when required, provision of DACS, Letters of Agreement to enable access by specific local airspace users.	

2.	Airspace description and operational arrangements	Status
2.1	Is the type of proposed airspace design clearly stated and understood?	YES
	Small Danger Area, activated by NOTAM when required.	
2.2	Are the hours of operation of the airspace and any seasonal variations stated and acceptable?	YES
	Although not fixed, and subject to MOD requirements, predominately activated May-Sep 0830-1730 Mon-Thu, 0830-1430 Fri. Activity would likely be in blocks of 3-6 weeks. Only activated when required.	
2.3	Is any interaction with adjacent domestic and international airspace structures stated and acceptable including an explanation of how connectivity is to be achieved? Has the agreement of adjacent States been secured in respect of High Seas airspace changes?	N/A
	Entirely in Class G airspace, providing connectivity to EGD123. No interactions with other airspace structures and entirely over land.	
2.4	Is the supporting statistical evidence relevant and acceptable?	YES
	Statistical evidence limited to indicative data relating to General Aviation activity in the region, and approximate figures relating to MOD activity at Keevil. This is proportionate and acceptable.	
2.5	Is the analysis of the impact of the traffic mix on complexity and workload of operations complete and satisfactory?	YES
	Deemed to be minimal impact on other airspace users, with the potential for improved clarity on Keevil activity including access to the airspace through the provision of DACS.	



2.6	Are any draft Letters of Agreement and/or Memoranda of Understanding included and, if so, do they contain the commitments to resolve ATS procedures (ATSD) and airspace management requirements?	PARTIAL
	<p>Four LoAs are drafted, 3 of which are modifications to existing agreements. These will require some minor modifications and sign-off prior to activation of the proposed Danger Area.</p> <ul style="list-style-type: none"> <li>• Edington Farm Strip and Defence Infrastructure Organisation (Salisbury Plain Training Area).</li> <li>• Avon Hang gliding/Paragliding Club and Defence Infrastructure Organisation (HQ Salisbury Plain).</li> <li>• Helicopter Emergency Medical Services and Watchkeeper Force.</li> <li>• Defence Infrastructure Organisation (HQ Salisbury Plain), MOD Boscombe Down, and Watchkeeper Force.</li> </ul> <p>CONDITION</p> <p>1. Draft LoAs shall be finalised and signed before the first activation of the Danger Area. Confirmation of this action is to be provided to the CAA.</p>	
2.7	Should there be any other aviation activity (low flying, gliding, parachuting, microlight site etc) in the vicinity of the new airspace structure and no suitable operating agreements or ATC Procedures can be devised, what action has the change sponsor carried out to resolve any conflicting interests?	
	<p>Establishment of a DACS and DAAIS, draft LoAs for conditional access by HEMS, Avon Hang gliding/Paragliding Club, and Edington Farm Strip. Some aspects of the arrangements with HEMS requires further analysis, specifically in consideration of the intention for HEMS pilots to take visual separation against the BVLOS aircraft.</p> <p>CONDITION</p> <p>2. A Safety Case shall be provided to the CAA that considers the hazards, threats, prevention/recovery controls etc associated with HEMS pilots taking visual separation against BVLOS aircraft whilst inside the Danger Area. A crossing utilising the DACS will be required until such a time as the CAA has accepted the additional procedures described in the LoA.</p>	
2.8	Is the evidence that the airspace design is compliant with ICAO SARPs, airspace design & FUA regulations, and Eurocontrol guidance satisfactory?	YES
	<p>Danger areas are airspace structures recognised by ICAO, Eurocontrol and the UK as being suitable for notification of activities potentially hazardous to other airspace users. In the UK danger areas are routinely used to provide segregation of BVLOS activity from other airspace users. As per Flexible Use of Airspace and Airspace Management requirements, the dimensions of the Danger Area are the minimum required to support the operation and activation is on an 'as needed' basis. The structure will be published in the UK AIP (ENR5.1), with coordinates being subject to Aeronautical Data Quality requirements.</p>	

2.9	Is the proposed airspace classification stated and justification for that classification acceptable?	YES
	No change, airspace remains Class G.	
2.10	Within the constraints of safety and efficiency, does the airspace classification permit access to as many classes of user as practicable?	PARTIAL
	Establishment of a DACS and DAAIS, draft LoAs for conditional access by HEMS, Avon Hang gliding/Paragliding Club, and Edington Farm Strip. Some aspects of the arrangements with HEMS require further analysis, specifically in consideration of the intention for HEMS pilots to take visual separation against the BVLOS aircraft.  <a href="#">See Condition 2 above.</a>	
2.11	Is there assurance, as far as practicable, against unauthorised incursions? (This is usually done through the classification and promulgation.)	YES
	The Danger Area is to be promulgated in the UK AIP (ENR5.1), activated by NOTAM with as much notice as possible (although a notification period is not specified by the sponsor), cancelled by NOTAM if no longer required. The DACS provided by Boscombe Down ATC (with a surveillance capability) is determined by the Change Sponsor to be essential; if DACS is not available the Danger Area will not be activated.  <b>CONDITION</b> 3. <a href="#">In accordance with the CAA Policy for Permanently Established Danger Areas and Temporary Danger Areas, unless otherwise approved by the CAA, a minimum of 24-hours notification before activity start time should be provided.</a>	
2.12	Is there a commitment to allow access to all airspace users seeking a transit through controlled airspace as per the classification, or in the event of such a request being denied, a service around the affected area?	N/A
	No new volumes of controlled airspace are proposed, the area remains Class G. The DACS provided by Boscombe Down ATC (with a surveillance capability) is determined by the Change Sponsor to be essential; if DACS is not available the Danger Area will not be activated. LoAs permit additional conditional access by some specific local airspace users.	

2.13	Are appropriate arrangements for transiting aircraft in place in accordance with stated commitments?	PARTIAL
	<p>The DACS provided by Boscombe Down ATC (with a surveillance capability) is determined by the Change Sponsor to be essential; if DACS is not available the Danger Area will not be activated. DAAIS expected to be in place to provide pre-flight and in-flight information on the status of the Danger Area.</p> <p>Activities that currently take place at Keevil are expected to continue outwith those times when the proposed new Danger Area will be activated. Currently it is not clear when activity is likely to be taking place and as a consequence airspace users may be avoiding the area unnecessarily; this is due to:</p> <ul style="list-style-type: none"> <li>• The lack of an aerodrome entry for Keevil in the Mil AIP. It should also be noted that, unlike many other MOD minor aerodromes, no Flight Restriction Zone or Runway Protection Zones are established.</li> <li>• The information regarding gliding activity contained in the AIP (ENR5.5) may be inaccurate in that it indicates that gliding may be taking place in daylight hours on any day; the Change Sponsor for this ACP states that gliding normally takes place at weekends.</li> <li>• The information regarding parachute activity contained in the AIP (ENR5.5) is unclear in that parachuting is subject to NOTAM (from FL150) but that some supply drop activity may take place at any time (from 2000ft).</li> <li>• The Note entry on the VFR charts recommends that pilots avoid the area at all times by 2nm and 2000ft.</li> </ul> <p><b>CONDITION</b></p> <ol style="list-style-type: none"> <li>4. The Change Sponsor is to provide confirmation that London Information are aware of the requirement for them to provide a DAAIS on the proposed new Danger Area.</li> <li>5. The MOD shall ensure that the activities undertaken at Keevil are published in the AIP ENR5.5 and on VFR charts clearly and accurately such that other airspace users can gain an understanding of likely airspace use in the area.</li> </ol> <p><b>RECOMMENDATION</b></p> <ol style="list-style-type: none"> <li>1. The MOD should consider including Keevil in the Mil AIP as an active aerodrome such that other airspace users can gain greater awareness of activity.</li> </ol>	
2.14	Are any airspace user group's requirements not met?	NO
	The proposed Danger Area enables segregated MOD activities when required, whilst providing as much access as possible to other airspace users when activated. Other aviation activities may still take place at other times.	

2.15	Is any delegation of ATS justified and acceptable? (If yes, refer to Delegated ATS Procedure).	N/A
	No ATS provided from Keevil, provision of DACS/LARS by MOD Boscombe Down.	
2.16	Is the airspace design of sufficient dimensions with regard to expected aircraft navigation performance and manoeuvrability to contain horizontal and vertical flight activity (including holding patterns) and associated protected areas in both radar and non-radar environments?	YES
	The Danger Area has been designed to meet the minimum requirements for flight by Watchkeeper RPAS, including emergency procedures. The RPAS aircraft follow pre-defined routes, and these have been used to define the lateral and vertical boundaries of the Danger Area, as well as safely manage access for local airspace users through the use of LoAs.	
2.17	Have all safety buffer requirements (or mitigation of these) been identified and described satisfactorily (to be in accordance with the agreed parameters or show acceptable mitigation)? (Refer to buffer policy letter.)	N/A
	The Change Sponsor states that the proposed Danger Area is 5.7NM from the nearest volume of Controlled Airspace (associated with Bristol airport). The CAA Technical Regulator measured this to be 6.3NM at the closest point; in either case, no buffers are required against ATS Network traffic.	
2.18	Do ATC procedures ensure the maintenance of prescribed separation between traffic inside a new airspace structure and traffic within existing adjacent or other new airspace structures?	N/A
	There are no ATC requirements for prescribed separation beyond those already established for the provision of LARS by MOD Boscombe Down. The provision of DACS is in accordance with the draft LoA, where access by other airspace users can be provided when BVLOS activities are not taking place in the proposed new Danger Area.	
2.19	Is the airspace structure designed to ensure that adequate and appropriate terrain clearance can be readily applied within and adjacent to the proposed airspace?	YES
	A single airspace structure with a simple design, established from the surface to a uniform upper level that enables the BVLOS aircraft to operate to/from Keevil and transit to/from EGD123 in accordance with minimum height regulations. The airspace remains Class G so terrain responsibilities for other airspace users are unaffected.	

2.20	If the new structure lies close to another airspace structure or overlaps an associated airspace structure, have appropriate operating arrangements been agreed?	YES
	The proposed new Danger Area has been designed specifically to facilitate BVLOS aircraft transiting from Keevil in/out of the Danger Areas associated with the SPTA, and as such it adjoins EGD123.	
2.21	Where terminal and en-route structures adjoin, is the effective integration of departure and arrival routes achieved?	N/A
	This ACP does not impact terminal or en-route airspace structures or procedures.	

3.	Supporting resources and communications, navigation and surveillance(CNS) infrastructure	Status
3.1	Is the evidence of supporting CNS infrastructure together with availability and contingency procedures complete and acceptable? The following are to be satisfied:	YES
	<ul style="list-style-type: none"> <li>• <b>Communication:</b> Is the evidence of communications infrastructure including RT coverage together with availability and contingency procedures complete and acceptable? Has this frequency been agreed with AAA Infrastructure?</li> </ul>	YES
	No change to the MOD Boscombe Down ATC area of responsibility other than an agreement to provide DACS. The Danger Area will not be activated if the DACS is unavailable. Operation of Watchkeeper from Keevil was trialled in 2021.	
	<ul style="list-style-type: none"> <li>• <b>Navigation:</b> Is there sufficient accurate navigational guidance based on in-line VOR or NDB or by approved RNAV-derived sources, to contain the aircraft within the route to the published RNP value in accordance with ICAO/ Eurocontrol standards? For example, for nav aids, has coverage assessment been made, such as a DEMETER report, and if so, is it satisfactory?</li> </ul>	N/A
	No change to the MOD Boscombe Down ATC area of responsibility other than an agreement to provide DACS. The Danger Area will not be activated if the DACS is unavailable. Operation of Watchkeeper from Keevil was trialled in 2021.	
	<ul style="list-style-type: none"> <li>• <b>Surveillance:</b> Radar provision – have radar diagrams been provided, and do they show that the ATS route/airspace structure can be supported?</li> </ul>	YES
	No change to the MOD Boscombe Down ATC area of responsibility other than an agreement to provide DACS. The Danger Area will not be activated if the DACS is unavailable. No radar diagrams provided but operation of Watchkeeper from Keevil was trialled in 2021, and the aerodrome lies well within the current Boscombe Down LARS area.	
3.2	Where appropriate, are there any indications of the resources to be applied, or a commitment to provide them, in line with current forecast traffic growth acceptable?	YES
	MOD Boscombe Down are expected to provide DACS. If DACS is not available, the Danger Area will not be activated.	

4.	Maps/charts/diagrams	Status
4.1	<p>Is a diagram of the proposed airspace included in the proposal, clearly showing the dimensions and WGS84 coordinates?</p> <p>(We would expect sponsors to include clear maps and diagrams of the proposed airspace structure(s) – they do not have to accord with aeronautical cartographical standards (see airspace change guidance), rather they should be clear and unambiguous and reflect precisely the narrative descriptions of the proposals.)</p>	YES
	<p>Indicated on reproduced sections of VFR Charts, and as an overlay on 3-dimensional Google Earth images. WGS84 coordinates are included in an Aerodata spreadsheet for checking against Aeronautical Data Quality requirements.</p>	
4.2	Do the charts clearly indicate the proposed airspace change?	YES
	See Executive Summary.	
4.3	Has the change sponsor identified AIP pages affected by the change proposal and provided a draft amendment?	PARTIAL
	<p>A draft AIP entry is included in the aeronautical data spreadsheet. The wording in the Remarks column for the entry into ENR5.1 requires minor modifications to address a point of clarity regarding the provision of DACS/DAAIS, and to ensure that the Danger Area is notified as 'Non-AMC Managed' (NAM). The latter is a requirement of the CAA Policy for Permanently Established Danger Areas and Temporary Danger Areas. The Policy also places a number of ongoing obligations regarding the management of the airspace structure on the Danger Area Authority, including ensuring the safe and efficient use of the airspace. The MOD has nominated the Joint Helicopter Command HQ as the DAA, who are not currently DAA for any other Danger Areas.</p> <p><b>CONDITION</b></p> <ul style="list-style-type: none"> <li>6. The final wording in the AIP entry shall be agreed with the CAA prior to publication.</li> <li>7. Prior to implementation of the Danger Area, the nominated DAA manager shall provide assurances to the CAA that they are aware of their responsibilities as described in CAA CAP740 and the CAA Policy for Permanently Established Danger Areas and Temporary Danger Areas.</li> </ul>	

4.4	Has the change sponsor completed the WGS84 spreadsheet and submitted to the CAA for approval?	YES
	See Condition 6 above.	



5.	Operational impact	Status
5.1	<p>Is the change sponsor's analysis of the impact of the change on all airspace users, airfields and traffic levels, and evidence of mitigation of the effects of the change on any of these, complete and satisfactory?</p> <p>Consideration should be given to:</p>	YES
	a) Impact on IFR General Aviation traffic, on Operational air traffic or on VFR General Aviation traffic flow in or through the area.	YES
	<p>Whilst the Class G nature of the local area makes it difficult to analyse accurately the current use of the airspace, and therefore the potential impact on other airspace users, the Change Sponsor has made a concerted effort to gather as much information as is reasonably possible. Due to the existing nature of activities at Keevil, including the information published in the AIP and on the VFR charts, the Change Sponsor has deduced that there is likely to be minimal impact from this airspace change. In many cases, where pilots are able to utilise on-board radios, there may be a benefit in that a DACS will be available when the Danger Area is activated providing access when the BVLOS aircraft is elsewhere ie on the ground or operating over the SPTA. The Change Sponsor has also developed agreements with some local airspace users, including HEMS operators, to further minimise the impacts.</p> <p>The Proposal indicates that many airspace users may currently be avoiding the airspace in the immediate vicinity of Keevil unnecessarily. The CAA Technical Regulator considers that this may in part be due to the inaccurate entries in the AIP, the lack of an aerodrome entry in the Mil AIP and the note on the VFR charts recommending avoidance at all times. As such, the MOD should ensure the information regarding the other activities taking place at Keevil are accurately described in aeronautical publications. See Condition 5 and Recommendation 1.</p>	
	b) Impact on VFR Routes.	YES
	There are no VFR Routes in the area.	
	c) Consequential effects on procedures and capacity, i.e. on SIDs, STARs, holds. Details of existing or planned routes and holds.	YES
	There are no anticipated impacts on airport procedures or ATS Routes.	

	d) Impact on airfields and other specific activities within or adjacent to the proposed airspace.	YES
	Impact on local hang gliding/paragliding activity mitigated by an amendment to an existing LoA to provide access to a section of the Danger Area when not required for BVLOS activities. Impact on local private strip mitigated by an amendment to an existing LoA. Impact on local HEMS activity mitigated by an amendment to an existing LoA. Impact on aircraft in transit through the area mitigated by activation only when required and by provision of DACS/DAAIS. Also see Condition 5 and Recommendation 1.	
	e) Any flight planning restrictions and/ or route requirements.	YES
	No impacts.	
5.2	Does the change sponsor consultation material reflect the likely operational impact of the change?	YES

Case study conclusions – to be completed by Airspace Regulator (Technical)	Yes/No
Has the change sponsor met the SARG airspace change proposal requirements and airspace regulatory requirements above?	YES
<p>The Change Sponsor has pursued a proportionate approach to developing the airspace design, taking into consideration the potential impact on other airspace users. Despite the uncertainties regarding aviation activities in Class G airspace, the Change Sponsor has taken steps to develop a good understanding of current behaviours within the airspace and has mitigated the potential impact of the proposed new Danger Area as much as is reasonably practicable.</p>	

RECOMMENDATIONS/CONDITIONS/PIR DATA REQUIREMENTS	Yes/No
Are there any Recommendations which the change sponsor <b>should try</b> to address either before or after implementation (if approved)? If yes, please list them below.	YES
<p><b>GUIDANCE NOTE:</b> Recommendations are something that the change sponsor <b>should try</b> 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> <p>RECOMMENDATION</p> <ol style="list-style-type: none"> <li>1. The MOD should consider including Keevil in the Mil AIP as an active aerodrome such that other airspace users can gain greater awareness of activity.</li> </ol>	
Are there any Condition(s) which the change sponsor <b>must fulfil</b> either before or after implementation (if approved)? If yes, please list them below.	YES
<p><b>GUIDANCE NOTE:</b> Conditions are something that the change sponsor <b>must fulfil</b> either before or after implementation, if indeed the airspace change proposal is approved. If their proposal is approved, change sponsors <b>must observe</b> any condition(s) contained within the regulatory decision; failure to do so <b>will usually</b> 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>	

CONDITION

1. Draft LoAs shall be finalised and signed before the first activation of the Danger Area. Confirmation of this action is to be provided to the CAA.
2. A Safety Case shall be provided to the CAA that considers the hazards, threats, prevention/recovery controls etc associated with HEMS pilots taking visual separation against BVLOS aircraft whilst inside the Danger Area. A crossing utilising the DACS will be required until such a time as the CAA has accepted the additional procedures described in the LoA.
3. In accordance with the CAA Policy for Permanently Established Danger Areas and Temporary Danger Areas, unless otherwise approved by the CAA, a minimum of 24-hours notification before activity start time should be provided.
4. The Change Sponsor is to provide confirmation that London Information are aware of the requirement for them to provide a DAAIS on the proposed new Danger Area.
5. The MOD shall ensure that the activities undertaken at Keevil are published in the AIP ENR5.5 and on VFR charts clearly and accurately such that other airspace users can gain an understanding of likely airspace use in the area.
6. The final wording in the AIP entry shall be agreed with the CAA prior to publication.
7. Prior to implementation of the Danger Area, the nominated DAA manager shall provide assurances to the CAA that they are aware of their responsibilities as described in CAA CAP740 and the CAA Policy for Permanently Established Danger Areas and Temporary Danger Areas.

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.

YES

***GUIDANCE NOTE:*** PIR data requirements concerns any specific data which the change sponsor ***must*** 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.

The Change Sponsor should collate relevant data as described in CAP1616, CAP740 and the CAA Policy for Permanently Established Danger Areas and Temporary Danger Areas.

## General summary

The Change Sponsor proposes a suitable and proportionate airspace design to meet their aims. The Danger Area is required to support the MOD's intent of conducting BVLOS operations from Keevil, whilst conforming to current CAA and MAA regulatory requirements. Across the UK work is underway to develop a means for enabling safe accommodation and possibly integration of BVLOS activities with other airspace users without the need for airspace structures to provide segregation; however, the output from this work is not expected in time to meet the requirements of the Change Sponsor.

The Change Sponsor has endeavoured to minimise the impact of this airspace change on other airspace users, including minimising the lateral and vertical extent of the Danger Area, activating it only when required, and through the provision of a DACS. In some ways this change will provide an increased amount of clarity regarding Keevil activities and greater opportunities for accessing the airspace than is currently in place; this could be beneficial to other airspace users who may be avoiding the area unnecessarily. The CAA will need to ensure that the MOD update the Keevil entries in the AIP and on VFR charts where necessary such that they provide an accurate representation of the gliding and paratropping activities. The CAA will also need to discuss with the MOD the benefits to other airspace users for including Keevil in the Mil AIP as an active aerodrome.

The Change Sponsor has developed local agreements to facilitate other specific airspace users that may require access to the Danger Area. This includes regional HEMS operators, but more work is required to determine if there are any safety and regulatory matters to resolve reading HEMS pilots taking visual separation against the BVLOS aircraft within the Danger Area.

## Comments and observations

Nil.

Operational assessment sign-off	Name	Signature	Date
Operational assessment completed by Airspace Regulator (Technical)	██████████	████████████████████ ████████████████████ ████████████████████	10 Feb 23
Operational assessment approved by Manager Airspace Regulation	██████████		20 Feb 23
Manager Airspace Regulation Comments: Case Officers comments are noted and my overall recommendation is set out in the Decision Log			
Head AAA	Name	Signature	Date
Operational assessment conclusions approved by Head AAA	██████████	████████████████████ ████████████████████ ████████████████████	3 Mar 23
Head AAA Comments and Decision: Case Officers comments are noted and my overall recommendation is set out in the Decision Log			