

# CAA Decision Log

Airspace Change Proposal Title	Enabling BVLOS UAS Operations from Keevil Airfield
Airspace Change Proposal Reference	ACP-2021-006
Change Sponsor	MOD
AIS Submission Target Date	24 Feb 23 (AIP SUP)
CAA Decision Target Date	17 Feb 23

*Instructions*

In providing a response to each question and/or status, the following colour coding should be used:

- COMPLIANT/NOT APPLICABLE
- NOT COMPLIANT/ACTION REQUIRED
- ISSUE/CONCERN TO HIGHLIGHT

## Executive Summary

- *Issue/opportunity to be addressed*

The Ministry of Defence (MOD) is seeking to establish a Danger Area to facilitate Beyond Visual Line of Sight (BVLOS) flying of Remotely Piloted Air Systems (RPAS), principally Watchkeeper, between Keevil Airfield and the existing Danger Areas of Salisbury Plain Training Area (SPTA).

- *Desired outcome*

The proposed Keevil Danger Area is expected to facilitate:

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

Supported by the provision of a Danger Area Crossing Service (DACS) from MOD Boscombe Down Air Traffic Control (ATC).

- *Challenges/Risks*

Letters of Agreement provide conditional access to the active Danger Area by specified local airspace users. Further work is required to consider the suitability of Helicopter Emergency Medical Services (HEMS) pilots occasionally taking visual separation against the BVLOS aircraft.

The Sponsor has expressed a need to implement the new Danger Area in time for first anticipated activation in mid-May to support MOD operational training requirements. This has been the subject of MOD discussions with Government ministers. Due to the ACP timeline, initial implementation will require use of an Aeronautical Information Publication (AIP) Supplement (SUP); this will need to be subject to clear notification via a Skywise alert in advance of the first activation. Transfer of the publication of the Danger Area from the SUP to the AIP needs careful coordination.

There continues to be a general concern amongst elements of the General Aviation community about continued use of airspace structures to segregate BVLOS activity.

- *Recommendation*

The ACP is recommended for approval, with Conditions and Recommendations.

- *Minded-to (SoS) / draft decision (if applicable)*

Not applicable.

- *Implementation plan (notification/promulgation of change if approved)*

The airspace structure will initially be implemented via an AIP SUP in order to meet the MOD requirements of first activation in mid-May. The submission cut-off date is 24 Feb 23, leading to promulgation on 6 Apr 23. It is intended to include a 'first use not before' date in the AIP Supplement (to be determined but expected to be mid-May); however, to ensure wide circulation of the change, a Skywise notification is also recommended.

The new Danger Area will be included in the AIP at a later date that is mutually acceptable to the CAA and AIS, at which point the AIP Supplement will no longer apply.

POST DECISION NOTE:

It is now intended to publish the new Danger Area on 4 May 23 via AIP SUP, with first activation not before 15 May 23. It is anticipated that the Danger Area will be permanently published in the AIP in AIRAC 06/2023 (effective 15 Jun 23).

PART A – Airspace Change Process - GATEWAYS		
A.1	<p><i>Insert hyperlink to CAA website / Airspace Change Portal</i></p> <p><a href="https://www.caa.co.uk">Airspace change proposal public view (caa.co.uk)</a></p>	
A.2	<p><i>Insert hyperlink to CAA SharePoint site</i></p> <p>Keevil Airfield - BVLOS UAS Activity (permanent) (sharepoint.com)</p>	
A.3	<p>Stage 1 DEFINE Gateway (<i>insert hyperlink</i>)</p> <p>20211206-Keevil BVLOS Stage 1 Gateway Recommendation-FINAL.pdf</p>	17/12/2021
A.4	<p>Stage 2 DEVELOP &amp; ASSESS Gateway (<i>insert hyperlink</i>)</p> <p>20220302-Keevil BVLOS Stage 2 Gateway Recommendation-FINAL.pdf</p>	25/02/2022
A.5	<p>Stage 3 CONSULT Gateway (<i>insert hyperlink</i>)</p> <p>20220531-Keevil Stage 3 Gateway Resubmission Recommendation-FINAL.pdf</p>	27/05/22
A.6	<p><i>Insert a summary of the change sponsors' progress through the regulatory process (chronology).</i></p> <p>SON V1 submitted – 29 Jan 2021</p> <p>Assessment Meeting – 16 Sep 2021</p> <p>SON V2 submitted – 20 Sep 2021</p> <p>Stage 1 Gateway – 17 Dec 2021</p> <p>Stage 2 Gateway – 25 Feb 2022</p> <p>Stage 3 Gateway (not progressed) – 29 Apr 2022</p> <p>Stage 3 Gateway (progressed following post-gateway actions) – 27 May 2022</p> <p>Formal Proposal V1.0 submitted – 2 Nov 2022</p> <p>Aerodata spreadsheet received – 30 Nov 2022</p> <p>Formal Proposal V1.1 submitted following clarification questions from CAA, and Document Check complete – 7 Dec 2022</p>	

A.7	<p><i>Are there any additional process requirements of the Civil Aviation Authority (Air Navigation) Directions 2017 (as amended) (the “Air Navigation Directions”) and/or the Air Navigation Guidance 2017 which apply to this airspace change, and have they been complied with?</i></p> <p>No.</p>
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PART B – Airspace Change Process – STAGE 5				
<b>B.1</b>	<b>Was a Public Evidence Session required for this proposal?</b>		<i>N</i>	
B.1.1	Public Evidence Sessions do not apply to ‘M’ level ACPs. (CAP1616 Para 213)			
<b>B.2</b>	<b>Were any requests made for this decision to be called-in by the Secretary of State?</b>		<i>N</i>	
B.2.1				
<b>B.3</b>	<b>Does the Secretary of State call-in criteria apply to this proposal?</b>		<i>N</i>	
B.3.1	The call-in function does not apply to a proposal made by or on behalf of the MOD.			
<b>B.4</b>	<b>Has the Secretary of State decided to call-in this proposal?</b> <b>NOTE: if ‘Yes’ the content of this log concerns the recommendations linked to the ‘minded-to’ decision that has been presented to the Secretary of State.</b>		<i>N/A</i>	
B.4.1				
<b>B.5</b>	<b>Approval Status for SME Regulatory Assessments</b> <b>NOTE: this captures RAG status only – full details contained within each of assessment (hyperlinks inserted below)</b>			
	<b>ATM Safety</b>	<i>NOT APPLICABLE</i>	<b>Environmental</b>	<a href="#"><i>APPROVED</i></a>
	<b>Economic Assessment &amp; Statement</b>	<a href="#"><i>APPROVED</i></a>	<b>IFP</b>	<i>NOT APPLICABLE</i>
	<b>Engagement / Consultation</b>	<a href="#"><i>APPROVED</i></a>	<b>Operational</b>	<a href="#"><i>APPROVED</i></a>

B.5.1

*Is there any other information outside of the regulatory assessments above which should be brought to the attention of the decision maker (e.g. outstanding Letters of Agreement)?*

The Danger Area is planned to 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, largely in the summer period (May-September). There are likely to be one or two aircraft sorties a day, with only occasional use of the Keevil airfield for training circuits. This is expected to leave a significant period of time for other airspace users to access the airspace via a 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, or due to technical issues or changes in tasking.

Other activities that may take place at Keevil (ie gliding, helicopter training, parachuting, supply drops, model aircraft flying) 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:

- The lack of an aerodrome entry for Keevil in the Mil AIP.
- 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 routinely only takes place on Fri afternoons and weekends.
- The information regarding parachute activity contained in the AIP (ENR5.5) is unclear in that parachuting is subject to NOTAM but that some supply drop activity may take place at any time.
- A Note on the VFR charts recommends that pilots avoid the area at all times by 2nm and 2000ft due to military supply drops.

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 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.

All proposed new/amended Letters of Agreement require finalising and signing off.

The CAA Policy for Permanently Established Danger Areas and Temporary Danger Areas places a number of ongoing obligations regarding the management of the airspace structure on the Danger Area Authority (DAA), 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).

**B.6 Other Relevant Documents (title and hyperlinks to be inserted)**

[SARG Policy: Policy for Permanently Established Danger Areas and Temporary Danger Areas \(caa.co.uk\)](http://caa.co.uk)

[Mil AIP Part 3 Aerodromes](#)

[Military Aviation Authority Regulatory Article 2320: Role specific remotely piloted air systems](#)

**Keevil entries in the AIP (ENR 5.5 AERIAL SPORTING AND RECREATIONAL ACTIVITIES)**

KEEVIL GLIDER SITE, WILTS (AD) (W & T) 511850N 0020643W	Upper limit: 3000 FT AGL Lower limit: SFC	Phone: Bannerdown Gliding Club 01380- 870411.	Site elevation: 200 FT AMSL. Hours: HJ
KEEVIL PARACHUTE SITE, WILTS 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.



**Keevil Note on VFR Charts**

**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).

<b>B.7</b>	<p><b>Has the relevant legal and policy framework to the airspace change process been taken into account, including:</b></p> <ul style="list-style-type: none"> <li>• the Air Navigation Directions;</li> <li>• the Airspace Modernisation Strategy;</li> <li>• the Air Navigation Guidance 2017; and</li> <li>• CAP 1616 and associated publications?</li> </ul>	Y
<b>B.7.1</b>	<p>The Airspace Modernisation Strategy sets a vision for the future of UK airspace. This vision seeks to integrate RPAS operations without the requirement for segregation. However, in part due to technical limitations, there remains a requirement to segregate some RPAS activity; in addition, Military regulatory guidance requires segregated airspace for this specific type of RPAS operation as set out in MAA RA2320.</p>	
<b>B.8</b>	<p><b>CAA consideration of factors material to our decision whether to approve the change (Section 70 factors).</b></p> <p><b><u>NOTE:</u> the left column captures RAG Status only and the right column captures a summary of the rationale – full details will be contained within the regulatory assessments.</b></p>	
<p>Safe operation of aircraft 70(2)(a)</p>	<p>The UK CAA’s primary duty is to maintain a high standard of safety in the provision of air traffic services and this takes priority over all other duties.</p> <p>For the safety of other airspace users, BVLOS operations currently require the provision of segregated airspace. This change introduces a small Danger Area to segregate BVLOS activity from other airspace users. When the RPAS is on the ground or within adjacent Danger Areas, other airspace users will be able to access the area via the provision of a DACS. Other specific local airspace users will be permitted conditional access to the Danger Area at the same time as the RPAS but with agreed internal boundaries such that segregation is still maintained.</p>	

	<p>The ability for HEMS aircraft to transit through the Danger Area taking visual separation against RPAS is subject to additional consideration and cannot be approved at this stage.</p> <p>Of note, unlike many other MOD minor aerodromes, there is no Flight Restriction Zone or Runway Protection Zones established at Keevil that provide additional safety against unknown drone activity. However, for the purposes of this ACP safety is increased due to the Danger Area being applicable to all non-participating airspace users, including drones.</p>
<p>Efficient use of airspace and expeditious flow of air traffic 70(2)(a)</p>	<p>The UK CAA has a duty to secure the most efficient use of the airspace consistent with the safe operation of aircraft and the expeditious flow of air traffic. The UK CAA considers the most efficient use of airspace to mean securing the greatest number of movements of aircraft through a specific volume of airspace over a period of time so that the best use is made of the limited resource of UK airspace. The UK CAA considers the expeditious flow of air traffic to involve each aircraft taking the shortest amount of time for its flight. It is concerned with individual flights.</p> <p>Until methods for the safe integration of BVLOS activities with other airspace users have been developed, BVLOS operations currently require the provision of segregated airspace. This change introduces a Danger Area that has been designed to be the minimum required to achieve the aims. The Danger Area will only be activated when required. When the RPAS is on the ground or within adjacent Danger Areas, other airspace users will be able to access the area via the provision of a DACS. Other specific local airspace users will be permitted conditional access to the Danger Area at the same time as the RPAS but with agreed internal boundaries such that segregation is still maintained.</p> <p>No new volumes of controlled airspace are introduced, and the entirety of the local area remains Class G, including when the Danger Area is active.</p> <p>The impacts on other airspace users from this change are minimal as the majority of aircraft are already avoiding the area concerned; service provision and awareness of Keevil activities may actually improve as a result of this change. The CAA will work with the MOD to ensure that information on other Keevil activities is accurately and clearly presented in aeronautical publications.</p>

<p>Satisfy requirements of operators/owners of all classes of aircraft 70(2)(b)</p>	<p>The UK CAA has a duty to satisfy the requirements of operators and owners of all classes of aircraft. Until methods for the safe integration of BVLOS activities with other airspace users have been developed, BVLOS operations currently require the provision of segregated airspace. This change introduces a Danger Area that has been designed to be the minimum required to achieve the aims. The Danger Area will only be activated when required. When the RPAS is on the ground or within adjacent Danger Areas, other airspace users will be able to access the area via the provision of a DACS. Other specific local airspace users will be permitted conditional access to the Danger Area at the same time as the RPAS but with agreed internal boundaries such that segregation is still maintained.</p> <p>No new volumes of controlled airspace are introduced, and the entirety of the local area remains Class G, including when the Danger Area is active.</p> <p>The impacts on other airspace users from this change are minimal as the majority of aircraft are already avoiding the area concerned; service provision and awareness of Keevil activities may actually improve as a result of this change. Operators unable to take advantage of the DACS, such as those without a radio or radio license, will not be able to gain access to the Danger Area. However, it is likely that this will affect a low number of flights, especially when considering that many may already be avoiding the area due to the lack of certainty regarding activity at the airfield.</p> <p>The CAA will work with the MOD to ensure that information on other Keevil activities is accurately and clearly presented in aeronautical publications.</p>
<p>Interests of any other person 70(2)(c)</p>	<p>The UK CAA has a duty to take account of the interests of any person (other than an owner or operator of an aircraft) in relation to the use of any particular airspace or the use of airspace generally. The CAA is not required to consider the noise and environmental impact of MOD activities; however, there is a need to take into account the consequential impacts from changes to civil aviation activities. In this respect there will be very little, if any, difference to the impacts of any other person as a result of this change.</p>

<p>SoS guidance on environmental objectives 70(2)(d)</p>	<p>The UK CAA is required to take into account the Air Navigation Guidance 2017.</p> <p>In the Air Navigation Guidance 2017, the Government has set environmental objectives with respect to air navigation. These environmental objectives are ‘designed to minimise the environmental impact of aviation within the context of supporting a strong and sustainable aviation sector. The objectives are, to:</p> <ul style="list-style-type: none"> <li>• limit and, where possible, reduce the number of people in the UK significantly affected by adverse impacts from aircraft noise;</li> <li>• ensure that the aviation sector makes a significant and cost-effective contribution towards reducing global emissions; and</li> <li>• minimise local air quality emissions and in particular ensure that the UK complies with its international obligations on air quality.</li> </ul> <p>The Sponsor has assessed that all consequential environmental impacts on civil aviation will be negligible. The CAA agrees with this conclusion. This conclusion is based on the minimal number of aircraft consequentially affected by the change, the anticipated activation (i.e. not continuously activated), the Danger Area design having the minimal dimension required and that any impact will be further mitigated through the introduction a DACS.</p>
<p>Integrated operation of ATS 70(2)(e)</p>	<p>The UK CAA’s duty is to facilitate the integrated operation of air traffic services provided by or on behalf of the armed forces of the Crown and other air traffic services.</p> <p>There are no proposed changes to the current provision of ATS, other than MOD Boscombe Down providing DACS in Class G airspace. The DACS will be provided within an area where Boscombe Down Air Traffic Control is already providing a Lower Airspace Radar Service (LARS).</p>
<p>Interests of National Security 70(2)(f)</p>	<p>The UK CAA’s duty is to take account of the impact any airspace change may have upon matters of national security. The UK CAA is satisfied that the proposal has no impact on national security.</p>
<p>International obligations 70(2)(g)</p>	<p>The UK CAA’s duty is to take account of any international obligations entered into by the UK and notified by the Secretary of State. No such international obligations have been notified to the UK.</p>

<b>B.9</b>	<b>Conclusions in respect of requirement to ensure that the amount of controlled airspace is the minimum required to maintain a high standard of air safety and, subject to overriding national security or defence requirements, that the needs of all airspace users is reflected on an equitable basis.</b> <b><u>NOTE:</u> this section only applies if the CAA is classifying or amending the classification of UK airspace.</b>
B.9.1	No changes to the amount of Controlled Airspace, the ACP considers the introduction of a new Danger Area within Class G airspace.

**PART C – Stage 5 Recommendation**

<b>C.1</b>	<b>Taking the above information into account, what is your recommendation to the decision-maker for this proposal?</b>	
C.1.1	<p>The ACP is recommended for approval, with Conditions and Recommendations.</p> <p>It is not yet possible to approve the aspect of the HEMS LoA that enables HEMS pilots to operate ‘see and avoid’ through the active Danger Area when the BVLOS aircraft is present.</p>	
<b>C.2</b>	<b>Are there any Recommendations and/or Conditions for the change sponsor to address prior to implementation (if approved)?</b>	<b>Y</b>
C.2.1	<p><i>Recommendations are not mandatory, whereas conditions are requirements that must be met before the airspace change is activated. Conditions may include, for example, the need for all other necessary consents and approvals to be in place, notification and management processes, etc.</i></p> <p><b>CONDITIONS</b></p> <ol style="list-style-type: none"> <li>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.</li> <li>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.</li> <li>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.</li> <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> <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> <li>8. 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.</li> </ol>	

	<p><b>RECOMMENDATIONS</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> <li>2. 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.</li> <li>3. The change sponsor should inform the stakeholders of the decision (when published) and next steps.</li> </ol>	
<p><b>C.3</b></p>	<p><b>Are there any specific requirements in terms of the data to be collected by the change sponsor for the Post Implementation Review (if approved)?</b></p>	<p><i>N</i></p>
<p>C.3.1</p>	<p>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. Details to be provided to the Change Sponsor prior to implementation of the ACP.</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"> <li>• aircraft track data plots; and</li> <li>• traffic density plots</li> </ul> <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>	

C.4	Are any other consents and approvals needed in order to permit the intended operation (title and hyperlinks to be inserted)?		
C.5	Are there any other comments/observations for the decision maker?		Y
C.5.1	<p>The Change Sponsor received notable direct email communication from an individual stakeholder during Stage 2 and Stage 3 of the ACP. In an initial email to the Change Sponsor on 5 December 2021, the stakeholder raised concerns about the need to introduce segregated airspace. The Change Sponsor entered into constructive dialogue that led to a visit by the stakeholder at a meeting on 21 January 2022. This included a personal tour of the facilities/aircraft and a capability brief, as well as a discussion about the regulatory requirements for segregated airspace. The Change Sponsor agreed to continue to consider alternatives to danger areas as the ACP developed.</p> <p><b>6 June 2022:</b> In response to the Stage 3 consultation, the stakeholder emailed the Change Sponsor, copying in the Chair of the CAA. The stakeholder was not going to respond to the consultation online due to concerns that the format of the questions only allowed a position of accepting the airspace change. The online questionnaire asked stakeholders to rank the options in order of their preference; this was a mandatory question, which in hindsight was not ideal, however, there were opportunities for providing free text comments, and the stakeholder was already directly engaged with the Change Sponsor such that a response could have reasonably been provided. The stakeholder also cited a need for the consultation to be run again due to the Change Sponsor adopting a position that ‘fundamentally differs from that of the Secretary of State for Transport and consultees’.</p> <p>The stakeholder’s concerns with the ACP were that it would:</p> <ol style="list-style-type: none"> <li>1. Introduce more controlled airspace.</li> <li>2. Exclude General Aviation.</li> <li>3. Segregate drones instead of integrating them.</li> </ol> <p>On Point 1 the stakeholder is mistaken in that the classification of the airspace remains Class G, ie uncontrolled. The introduction of a danger area does not impact the airspace classification, as controlled airspace relates to the provision of an Air Traffic Control Service. Whilst MOD Boscombe Down provides services in the area these are classed as UK Flight Information Services, not ATC.</p>		



On Point 2, whilst exclusion of other airspace users is likely at times, this is mitigated due to the following:

- The Danger Area would be activated only when required.
- The Danger Area is not expected to be used all year round, with activity likely to be Mon-Fri in daylight hours for periods of 3-6 weeks at a time, largely in the summer period (May-September).
- A crossing services will be provided by the MOD. Access to the Danger Area would only be denied when RPAS operations are taking place in it, ie for take-off, landing and occasional circuits. For much of the time the aircraft would be operating in the SPTA danger areas.
- Arrangements for specific airspace users have been developed that allows conditional access through procedures described in draft Letters of Agreement.

On Point 3, the stakeholder is correct in that the aim for the UK is to integrate diverse airspace users including drones wherever possible, rather than segregate. However, BVLOS operations currently require segregation from other airspace users, largely due to technical reasons. There is work underway in the UK to develop a safety framework such that drones can operate in a more integrated fashion in the future; this is aspirational and does not yet change the current safety and regulatory considerations.

**19 June 2022:** In a follow-up email the stakeholder cited that the consultation had stopped without a satisfactory response to their proposals. The email described some alternative ideas to avoid segregating the activity, through use of a visual observer to 'escort' the aircraft to/from SPTA danger areas, or introduce an Area of Intense Drone activity similar to an Area of Intense Aerial Activity. The need for segregation was dismissed in the email due to the future development of Detect and Avoid technology and that the next generation of RPAS will be capable of being integrated.

The Change Sponsor replied on the same day stating that the consultation was not closed (due to close on 24 August 2022), all feedback from stakeholders was valuable, and that they were looking for an understanding as to how each of the options might impact other airspace users, including ideas on how to minimise the impacts. The Change Sponsor stated that the ideas presented by the stakeholder would not meet the current regulatory requirements as segregated airspace was needed.

The stakeholder's email response to the consultation was not included in the Consultation Review document, largely as a result of it having been sent via email and not directly responding to the questions posed by the Change Sponsor. The Engagement and Consultation Regulator has specified in the Conditions above that the Consultation Review Document and Final Submission Document must be amended to account for the response received from the stakeholder.

**PART D – Draft Regulatory Decision – Comment (for Level 1 Airspace Change Proposal's only)**

<b>D.1</b>	<b>Was a Draft Regulatory Decision published for this proposal?</b>	<i>N</i>
<b>D.2</b>	<b>Was any feedback received in relation to the Draft Regulatory Decision?</b>	<i>N/A</i>
<b>D.3</b>	<b>Has the Draft Regulatory Decision been amended in light of feedback received?</b>	<i>N/A</i>

## PART E – Final Regulatory Decision – Comment/Approval

Technical Regulator / Account Manager	[REDACTED]	[REDACTED]	10 Feb 23
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### Manager Airspace Regulation comments and regulatory decision:

The Airspace Modernisation Strategy (AMS) sets a vision for the future of UK airspace. In part this vision seeks to integrate RPAS operations without the requirement for segregation where possible. However, in part due to technical limitations, there remains a requirement to segregate some RPAS/UAS activity; this reality is therefore reflected within the Military regulations requiring segregated airspace for this specific type of RPAS operation. In principle the introduction of a Danger Area to achieve this segregation would likely have an impact to other airspace users. This impact is therefore necessarily considered against the requirement for the RPAS operations in the first instance. Within this ACP the MOD has demonstrated a requirement for a Danger Area to be established to enable critical training to be conducted. Significantly however, through effective engagement the Change Sponsor has developed a proposal that minimises the impact to other airspace users as far as practicable. These mitigations include the requirement for a Danger Area Crossing Service (DACS) throughout all hours of activation and the intent to avoid where possible weekend activations.

When considering the ACP, I agree with the conditions and recommendations noted above. I would highlight the condition that until otherwise approved, there is a need for a DACS to enable the HEMS transits of the Danger Area whilst ensuring the RPAS operations remain segregated. In addition to this I would add a further condition that the Change Sponsor should consider removing or amending the Danger Area when technology and regulations enable a more integrated approach. This should be considered by the Change Sponsor through the nominated Danger Area Activity Manager (DAAM) when conducting the yearly Danger Area review as required by the Danger Area Policy, ensuring alignment with the future vision of UK airspace. Furthermore, I would recommend the Change Sponsor considers extending the DACS provision to the remaining areas of Salisbury Plain Training Areas to facilitate HEMS transits.

I disagree with the Change Sponsor's assertion regarding this ACP achieving net-zero CO2 emissions. The impacts from any consequentially affected aircraft that may be re-routed when unable/incapable to utilise a DACS will still occur and thus cannot be discounted. However, I would agree these effects are negligible when considered against the likely volume of impacted traffic, in particular when considering the proposed mitigations. Subject to the above therefore I recommend approving this ACP.

Manager Airspace Regulation	[REDACTED]	[REDACTED]	20 Feb 23
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**Head AAA comments and regulatory decision:**

Subject to the conditions laid out above, approved.

Head AAA	[REDACTED]	[REDACTED]	3 Mar 23
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