



Skypports

Skypports Limited

Airspace Change – ACP-2020-038 – UAS BVLOS in Segregated Airspace

Summary Report – Formal Targeted Aviation Stakeholder Engagement

Version 2.0 – Dated: 20 May 2020

Amendment record

Issue	Amendment	Date
V1.0	Initial Issue	15/05/2020
V2.0	<ul style="list-style-type: none"> • Inclusion of MOD response (new Appendix I) • Updated Local airspace stakeholders table (6.2) • Inclusion of email from Air Task Group (new Appendix D) 	20/05/2020

This document is controlled by the Change Sponsor (Skyports' SUA Operator). The initial release version and any subsequent revision will be subject to the approval of the SUA Operator. Amendments to this document will be recorded in the Amendment Record. For reference, a copy of this version and all superseded versions will be stored on a secure server.

If this document is updated following meetings with the Civil Aviation Authority (CAA) or for any other reason, the SUA Operator as Change Sponsor will publish a new version on the CAA Airspace Change online portal for all to see. This is to enable the CAA to refer to the correct version if it needs to publish a determination of whether an airspace change is a relevant option to investigate.

Referenced documents

Document	Version	Version & Date	Source
CAP 1616	Airspace Change – Guidance on the regulatory process for changing the notified airspace design and planning and planned and permanent redistribution of air traffic, and on providing airspace information	Version 3.0 22 January 2020	CAP 1616

Acronyms and abbreviations

ACP	Airspace Change Proposal
AFISO	Aerodrome Flight Information Service Officer
AMSL	Above Mean Sea Level
BVLOS	Beyond Visual Line of Sight
CAA	Civil Aviation Authority
CAP	Civil Aviation Publication
DAAIS	Danger Area Activity Information Service
FIS	Flight Information Service
Freq	Frequency
GA	General Aviation
HLS	Helicopter Landing Site
NHS	National Health Service
MOD	Ministry of Defence
NOTAM	Notice to Airman
LTD	Limited
POC	Proof of Concept
RA(T)	Restricted Area (Temporary)
SAMS	Scottish Association of Marine Sciences
SFC	Surface
SUA	Small Unmanned Aircraft
TDA	Temporary Danger Area
TOI	Temporary Operating Instruction
UA	Unmanned Aircraft
UAS	Unmanned Aircraft System
VFR	Visual Flight Rules

Glossary

Aeronautical Information Publication	Long-term information essential to air navigation, including the detailed structure of UK airspace and flight procedures, which forms part of the UK Integrated Aeronautical Information Package. Sometimes informally known as the Air Pilot. Publication is the responsibility of the CAA but is carried out under licence by NATS. www.ais.org.uk
Air navigation service provider	An organisation which operates the technical system, infrastructure, procedures, and rules of an air navigation service system, which may include air traffic control.
Airspace change proposal	A request (usually from an airport or air navigation service provider) for a permanent change to the design of UK airspace.
Airspace design	Together, the airspace structure and flight procedures
Airspace change process	The staged process an airspace change sponsor follows to submit an airspace change to the CAA for a decision. The process includes actions associated with implementation and post-implementation review, after the CAA or, where applicable Secretary of State, decision.
Airspace Modernisation Strategy	A co-ordinated strategy and plan for the use of UK airspace for air navigation up to 2040, including for the modernisation of the use of such airspace, prepared and maintained by the CAA, incorporating the previous Future Airspace Strategy. It is a requirement of the Air Navigation Directions 2017. https://www.caa.co.uk/Commercial-industry/Airspace/Airspace-ModernisationStrategy/Aboutthe-strategy/
Airspace structure	Designated volumes of airspace within identified characteristics, including the equipment aircraft wanting to enter that airspace must carry and actions pilots must carry out before entering that airspace. The volumes of airspace are designed to ensure the safe and optimal operation of aircraft. Airspace structures consist of: (a) controlled airspace, namely control zones, control areas, terminal control areas and airways; (b) airspace restrictions, namely danger, restricted and prohibited areas; (c) radio mandatory zones, transponder mandatory zones; (d) other airspaces specified by the CAA when

	defining the airspace change process, such as, for example, flight information zones, aerodrome traffic zones, temporary segregated areas, temporary reserved areas or free-route airspace.
Beyond Visual Line of Sight (BVLOS)	An operation in which the remote pilot or observer does not use visual reference to the remotely piloted aircraft in the conduct of flight.
Consultation	Formal process seeking input into a decision, undertaken in line with the Gunning Principles, and government guidance
Danger Area	Airspace within which activities dangerous to the flight of aircraft may exist at notified times.
Design principles	The principles encompassing the safety, environmental and operational criteria and the strategic policy objectives that the change sponsor seeks to achieve in developing the airspace change proposal. They are an opportunity to combine local context with technical considerations, and are therefore drawn up through discussion with affected stakeholders.
Engagement	Catch-all term for developing relationships with stakeholders, covering a variety of activities including but not limited to consultation, information provision, regular and one-off meetings and fora, workshops and town hall discussions.
Feedback	Informal response to engagement – change sponsors may be expected to seek feedback from stakeholders in addition to formally consulting them.
Military operations	Operations undertaken by military aircraft, or military aerodromes.
Overflight	For the purposes of airspace changes, overflight is defined according to the CAA's report, CAP 1498 which outlines a measurement based upon community perception. It does not portray noise impacts. www.caa.co.uk/cap1498
Portal	The CAA's airspace change portal – an online portal containing details of all current and previous airspace changes, including the ability to respond to consultations. https://airspacechange.caa.co.uk
Representative group	Stakeholder group that gathers together those with similar interests in a proposal. It could be at an industry level (for instance the Airport Operators Association), national level (for instance the Aviation Environment Federation) or local level (for instance HACAN).
Sponsor (or change sponsor)	An organisation that proposes, or sponsors, a change to the airspace design in accordance with the CAA's airspace change process.
Stakeholder	An interested third party in an airspace change or PPR proposal.

Statement of Need	The means by which the change sponsor sets out what airspace issue or opportunity it is seeking to address and what outcome it wishes to achieve, without specifying solutions, technical or otherwise.
Uncontrolled airspace	Airspace in which aircraft are able to fly freely through the airspace without being constrained by instructions in routing or by air traffic control, unless they require an air traffic control service.
Unmanned aircraft system (UAS)	An Unmanned Aircraft System (UAS) comprises individual 'System Elements' consisting of the Unmanned Aircraft (UA) and any other System Elements necessary to enable flight, such as a Remote Pilot Station, Communication Link and Launch and Recovery Element. There may be multiple UAs, RPS or Launch and Recovery Elements within a UAS.

Contents

Amendment record	2
Referenced documents	2
Acronyms and abbreviations	2
Glossary	3
1 Introduction	8
2 Methodology	8
2.1 Stakeholder identification	8
2.2 Engagement material	8
2.3. Communications.....	8
2.4 Feedback.....	8
3 Skyports change proposals	9
3.1 Segregated airspace	9
3.2 Notification	10
3.3 TDA activation	10
4 Summary of feedback.....	10
4.1 Emergency services	10
4.2 Schedule services and general aviation.....	11
4.3 Unmanned aircraft (UA)	11
4.4 Deconfliction.....	11
5. Skyports response.....	11
5.1 Skyports responses to change proposal feedback	11
5.1.1 Airspace change.....	11
5.1.2 Deconfliction process	12
6 Stakeholders	12
6.1 Civil Aviation Authority.....	12
6.2 Local airspace stakeholders.....	12
7 Appendices	13
Appendix A: Babcock Mission Critical Services Onshore Ltd	13
Appendix B: Gama Aviation.....	14
Appendix C: Hebridian Air Services (Air Task).....	15
Appendix D: Email from Hebridian Air Services (Air Task Group).....	18
Appendix E: Maritime and Coastguard Agency.....	19
Appendix E: Oban & The Isles Airport.....	20
Appendix F: Police Scotland	21
Appendix G: Scottish Air Ambulance	24
Appendix H: The Scottish Association for Marine Sciences (SAMS)	25
Appendix I: Ministry of Defence.....	26
Appendix J: Skyports target engagement aviation stakeholder response form (redacted)	27

Appendix K: Skyports target engagement aviation stakeholder example email (redacted) 28

1 Introduction

Skyports (the change sponsor) is seeking a temporary airspace change to support its week-long proof of concept (PoC) operations between 25 May to 5 June 2020 to transport medical equipment by small unmanned aircraft (SUA) from one healthcare facility to another in Argyll on the west coast of Scotland. The operation is provided for the local healthcare providers to support the National Health Service (NHS) and UK Government responses to the COVID-19 through the provision of necessary equipment to front-line hospital staff.

The Airspace Change process, codified in CAA CAP 1616, mandates that all airspace change – temporary or permanent – can only be requested and implemented once due consideration has been given to the possible positive and negative impacts of the change on other airspace users

Following an Assessment Meeting with CAA Airspace Regulation on 6 May to discuss Skyports Statement of Need, it was agreed that to facilitate its operations a Temporary Danger Area (TDA) would be required, the proposals for which would be subject to a formal targeted aviation stakeholder engagement exercise.

This document provides a summary of Skyports formal targeted aviation stakeholder engagement exercise that Skyports completed between 8 May 2020 and 12 May 2020 to allow aviation stakeholders to comment formally on Skyports TDA design and operational proposals.

2 Methodology

2.1 Stakeholder identification

Skyports engaged the same aviation stakeholders as those during the informal engagement exercise, albeit with some removed because of irrelevance and with some added following recommendations from others during the informal engagement exercise. See [6 Stakeholders](#)

2.2 Engagement material

Skyports shared the engagement material containing details and a map of the proposed TDA, as well means of safe operation of that TDA. Skyports also provided an updated on its planned production of a deconfliction process many stakeholders would be asked to approve before the TDA be activated.

Materials containing technical information were presented in an accessible way as possible so as not to create a barrier to the provision of feedback.

The engagement material was approved by the CAA before distribution to stakeholders.

2.3 Communications

Skyports shared engagement material with stakeholders by uploading copies to the CAA Airspace Change portal ([ACP-2020-038](#)) and providing a copy by email, which was completed on 8 May 2020. Where an email was not available, through submission of enquiries to websites with details of the engagement exercise, Skyports offered to send the material upon receipt of a valid email address.

A reminder communication was provided by email on 11 May 2020, given that the closing date for feedback was the day after (12 May 2020 at 17:00).

Skyports proactively encouraged stakeholders to provide feedback, even if they had already provided feedback during the informal engagement process or, if there was no impact, to confirm no impact.

2.4 Feedback

Where stakeholders asked that we share their feedback in full with the CAA, Skyports provided this information at Step 3d Collate & Review Responses stage of the Airspace Change process on 12 May 2020.

All feedback was collated and stored on Skyports secure server as a record of the activity and ready for sharing with the CAA where necessary.

Where stakeholders requested that Skyports keeps them up-to-date with progress of the airspace change, Skyports will do this.

3 Skyports change proposals

3.1 Segregated airspace

Skyports requires a volume of segregated airspace within which to safely execute its operations and presented the following proposed airspace design to local airspace users:

Identification and Lateral Limits	Upper Limit Lower Limit	Remarks
1	2	3
TDA 1: Right/Yellow Area bounded by straight lines joining 562404N 0052616W – 562217N 0052853W – 562428N 0053429W – 562558M 0053123N	Lower Limit: SFC Upper Limit: 720ft AMSL	Activity: UAS Beyond Visual Line of Sight (BVLOS) Hours: When notified DAAIS: Oban Information FREQ: 118.055Mhz TEL: Skyports Flight Operations Sponsor: Skyports
TDA 2: Left/Purple Area bounded by straight lines joining 562558N 0053123W – 562428N 0053429W – 562834N 0054505W – 563015N 0054250	Lower Limit: SFC Upper Limit: 400ft AMSL	Activity: UAS Beyond Visual Line of Sight (BVLOS) Hours: When notified DAAIS: Oban Information FREQ: 118.055Mhz TEL: Skyports Flight Operations Sponsor: Skyports

FIGURE 1: FINAL PROPOSED AIRSPACE DESIGN

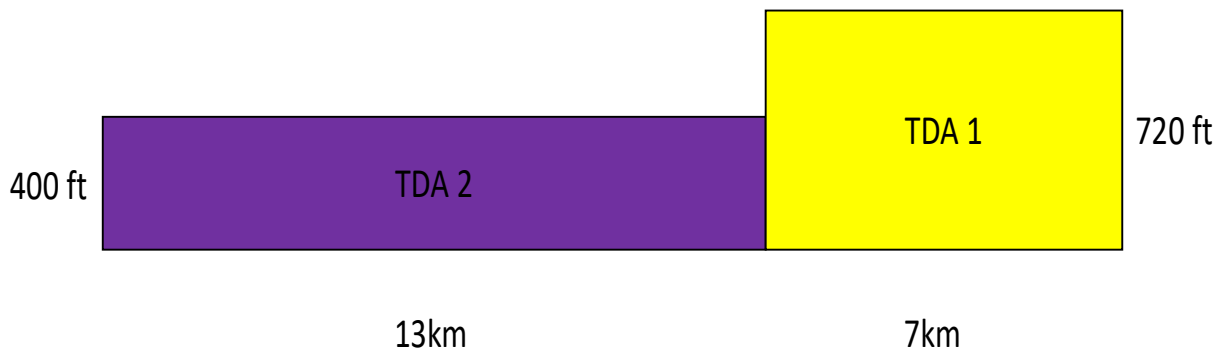


FIGURE 2: TDA CROSS SECTION OVERVIEW

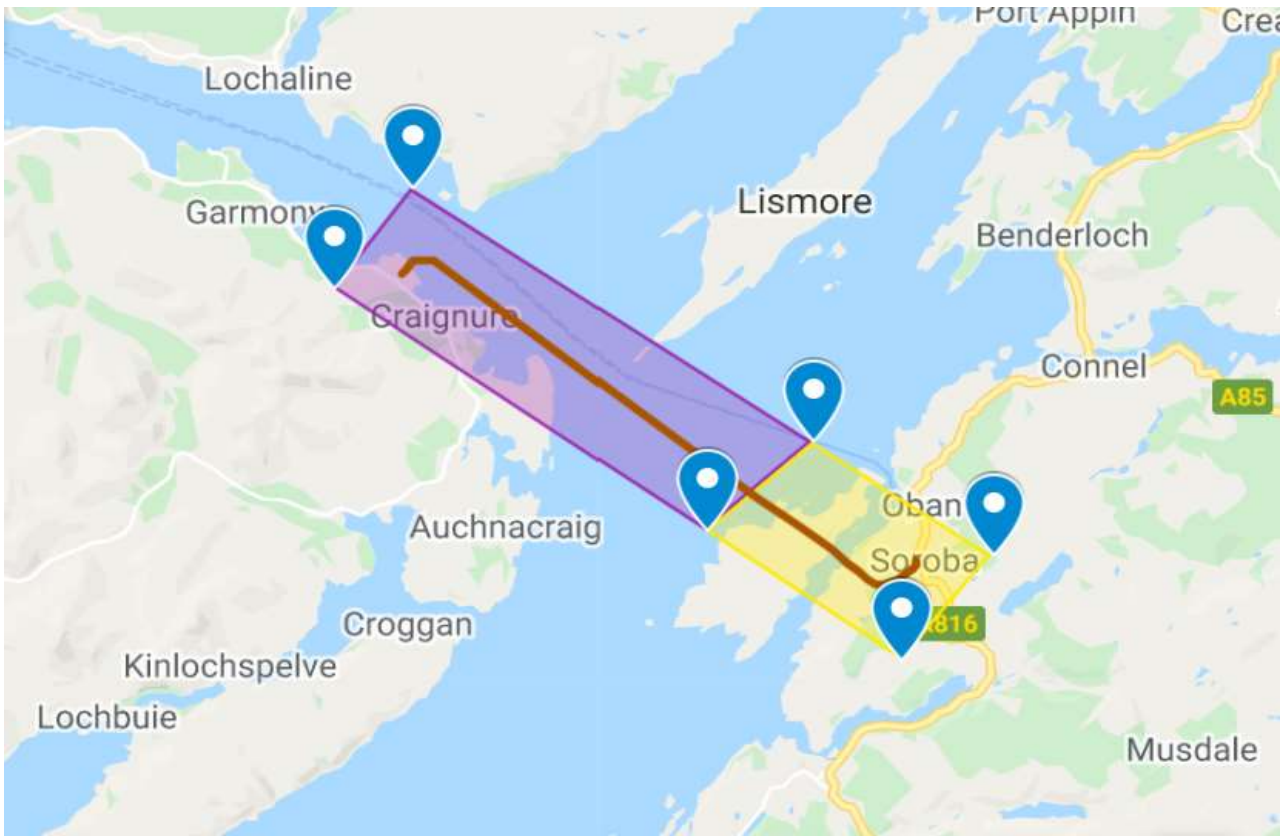


FIGURE 3: TOP DOWN VIEW OF PROPOSED AIRSPACE DESIGN

3.2 Notification

CAA Airspace Regulation will promulgate TDA activations by NOTAM on the days of planned use.

3.3 TDA activation

Date	Time
Monday 25 May 2020 to Friday 5 June 2020	Daylight hours from Monday to Friday, 30mins after sunrise and 30 mins before sunset

4 Summary of feedback

Skyports received feedback in written form from 8 stakeholders. All stakeholders were broadly supportive or willing to work with Skyports to find a workable solution that enables a safe manned and unmanned mix of operations. Skyports provides the following summary of responses from aviation stakeholders on the TDA proposals. Full, redacted versions of the 8 written responses to the formal targeted aviation stakeholders engagement exercise can be viewed in section [7 Appendices](#):

4.1 Emergency services

- Aerial emergency services or providers of aerial emergency services required routine access to the airspace in question, sometimes with minimal or no notice.
- The helicopter landing site (HLS) at the Lorn & Islands Hospital in Oban is in frequent use; procedures should be in place such that emergency service aircraft are not denied access to Oban HLS.
- Emergency tasking may require transit along the Fifth of Lorn below 400ft AMSL
- Clearance into the TDA must be available to emergency service aircraft with as little as 10 minutes notice, including when emergency service aircraft are already airborne.

- More specific or reduced TDA activation times would reduce the burden on emergency services.
- If short-notice clearances are not available, more pre-emptive clearances whenever emergency aircraft are tasked into the area would be required when weather is poor.

4.2 Schedule services and general aviation

- The proposals would not directly affect The Oban & The Isles Airport itself.
- The proposed TDA does take place in an area known to be on the approach to the airport, particularly flights still being carried out by VFR scheduled aircraft operating to the isles of Coll, Tiree, Colonsay and Islay to the west of Oban.
- VFR scheduled service aircraft are regularly required to operate as low as 500ft AMSL over the sea to satisfy VFR criteria, remaining clear of cloud with surface sight. A scheduled service provider suggests that Skyports operating at the near the top of the TDA, would increase the scheduled service operating minima and its ability to deliver their schedule and provides proposed mitigations. The operator suggests raising the top of the TDA to allow for a 500ft vertical separation from the operating altitude of the UAS – so an upper limited of 900ft AMSL.
- The scheduled service provider recommended that UAS activity should cease and the TDA to be declared inactive whenever commercial passenger operations to and from Oban airport are scheduled the application of an appropriate safety margin either side of planned departure and arrival in case of poor weather, a need to return to Oban or delay due to poor weather. The operator would prefer not UA activity to be live when intra-island services are operating but concede that this would constrain vital COVID-19 response.
- While GA traffic levels are expected to be low because of social distancing restrictions, light aircraft could be operating from the airport for maintenance purposes, which allows them to fly for 30min at 10NM from the airport.

4.3 Unmanned aircraft (UA)

- The public have been flying leisure UAs in the area and we have been urged by the police to consider with the CAA obtaining an appropriate restriction to justify the creation of a ‘geofence’ via a Restricted Area (Temporary) (RA(T))

4.4 Deconfliction

- All stakeholders expected to see a deconfliction process addressed in a mutually agreed Tactical Operating Instruction (TOI)

5. Skyports response

5.1 Skyports responses to change proposal feedback

Skyports appreciates the feedback that other airspace users took the time to provide and looks forward to working with them (and the CAA) to agree an airspace design and robust deconfliction process that satisfies everyone where reasonably practicable.

Having reviewed this valued feedback, Skyports considers and/or proposes the following:

5.1.1 Airspace change

- Skyports has decided not to change the design of the TDA. Skyports had already reduced the size of the TDAs following informal consultation and an increase of the heights to provide strategic deconfliction would unreasonably undermine Skyports operations; however, Skyports has agreed

to the stakeholder that raised the concern that we would be able to maintain safe separation through procedural means and through the use of Oban Information as a DAAIS (see [5.1.2 Deconfliction Process](#)). The stakeholder confirmed via subsequent email that they had no further objections to our proposals (see [Appendix D](#)).

5.1.2 Deconfliction process

- Skyports is in the process of revising its deconfliction process and intends to produce a comprehensive and robust Temporary Operating Instruction (TOI) that secures the approval of relevant stakeholders and the CAA.
- Skyports accepted a recommend by a stakeholder to employ Oban Information as a DAAIS service when the TDA is active as a robust means of deconfliction. Skyports has come to an arrangement with Oban & The Isles Airport to use their FIS service during normal operating times. Skyports will notify Oban Duty AFISO by phone prior to and following any flights so Oban Information can notify by radio any aircraft operators in the vicinity. When the deconfliction process needs to be enacted, Skyports will defer to Oban Information to provide the all clear to resume operations.
- Skyports agreed with the CAA that a DA(T)/Geofence was not feasible or required for this type of operation.

6 Stakeholders

6.1 Civil Aviation Authority

The CAA is being consulted at every stage of the airspace change process

6.2 Local airspace stakeholders

Stakeholder	Type of Organisation	Response (Informal)	Response (Formal)	Result in Design Change (Y/N)
Babcock International	Aviation service provider	Yes - Written	Yes – Written	No
Experience Day Pros	Aviation experience provider	No	No	N/A
Gama Aviation	Aviation service provider	No	Yes – Written	No
Glenforsa Airfield	Airfield	Yes – Phone	No	No
Hebredian Air Service (via Air Task)	Air transport operator	Yes – Written	Yes – Written and Phone	No
Maritime and Coastguard Agency	Emergency service provider	Yes – Written	Yes – Written	No
Oban Air Sports	Aviation training provider	Yes - Phone	No	No
Oban & The Isles Airport	Airport operator	Yes – Written and Phone	Yes – Written and Phone	No
Police Scotland	Emergency service provider	Yes – Written and Phone	Yes – Written	No
Ministry of Defence	Military	No	Yes – Written	No
Scottish Air Ambulance	Emergency service provider	Yes – Written	Yes – Written	NO
Scottish Association of Marine Sciences	Association	Yes – Written	Yes – Written	NO
Sky Jumping	Aviation experience provider	No	No	N/A

7 Appendices

Appendix A: Babcock Mission Critical Services Onshore Ltd

ACP-2020-038 - UAS BVLOS in Segregated Airspace Targeted Engagement with Aviation Stakeholders Response Form

[REDACTED]

Babcock Mission Critical Services Onshore Ltd

[REDACTED]

[REDACTED]

Feedback:

Babcock helicopters flying in support of the Scottish Ambulance Service and Police Scotland require routine access to the airspace in question, sometimes with minimal or no notice. The helicopter landing site at the Lorn & Islands Hospital in Oban is in frequent use and emergency tasking may require a transit along the Firth of Lorn below 400ft AMSL. Both these activities are impinged upon by the proposed TDA.

To introduce this airspace restriction with no degradation to our operational effectiveness, clearance into the TDA needs to be available to our aircraft via our tasking authorities with as little as 10 minutes notice; the dynamic nature of our tasking may involve clearance requests while airborne. More specific TDA activation times would reduce the burden in this regard – the NOTAM activation example given in the stakeholder engagement document states daylight hours for 12 days; perhaps this could be reduced to shorter daily periods.

If short-notice clearances are not an option, we would need to request more pre-emptive clearances whenever our aircraft are tasked into the general area, particularly when weather conditions are poor.

Appendix B: Gama Aviation

[REDACTED]

From: [REDACTED]
Sent: 11 May 2020 10:12
To: [REDACTED]
Subject: FW: ACP-2020-038 Airspace Change Proposal: UAS BVLOS in Segregated Airspace - Formal Stakeholder Engagement
Attachments: Skyports - Oban-Isle of Mull - Targeted Stakeholder Engagement.pdf; Skyports - Oban-Isle of Mull - Engagement Response.docx

Hello [REDACTED]

TDA proposal seems clear and well-defined. Only comment would be to echo that of SAS, to ensure procedures are in place such that emergency service aircraft are not denied access to Oban HLS.

Best wishes

[REDACTED]

[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Charter. Management. Maintenance.
gamaaviation.com

We are moving to new Headquarters.

[REDACTED]
After Easter 2020, this will be the new home for our Plc and Europe Air operations. Please note our telephone numbers will not change.

Gama Aviation 

Your mission, our passion
gamaaviation.com



This email and any attachments are confidential and may also be privileged. Gama Aviation (UK) Limited may monitor and record all emails. The views expressed in this email are those of the sender and not Gama Aviation (UK) Limited. If you have received this message in error, please notify the sender immediately, destroy this email and any attachments, and do not use, copy, store and/or disclose to any person this email and any attachments.

Gama Aviation (UK) Limited has completed a programme of work in readiness for the General Data Protection Regulation and this work will be ongoing to ensure that we are doing our best to protect your data. As a client or someone who receives regular updates from us, you want to be sure that your data is protected and we would like to refer you to our Privacy Policy.

All data received will be processed in line with the Gama Aviation Plc group policies and procedures including the Privacy Policy. Gama Aviation (UK) Limited maintains a documented information security programme which entails appropriate administrative, technical and physical safeguards to protect Personal Data against anticipated threats or hazards to its security, confidentiality and integrity.

If you have any further questions or would like to exercise your rights please email [REDACTED]

Gama Aviation (UK) Limited
Company Number: 01764148
Registered in England
Registered Office: [REDACTED]
VAT Registration Number: GB 945 7326 96

Appendix C: Hebridean Air Services (Air Task)



Name	██████████
Organisation name	Airtask Group
Position in the organisation	██
Email	██

Feedback:

Background

Airtask's Hebridean Air Services operation is an AOC operation under EASA Part CAT regulation. Hebridean provides scheduled and charter lifeline services with Britten-Norman BN2B Islander aircraft to the communities of the islands under a PSO contract to Argyll and Bute council. These services are recognized as essential during the current emergency. A copy of the current schedule can be found at the attached link. <https://www.hebrideanair.co.uk/timetables>

Analysis

The high terrain to the north and east of Oban airport effectively means that the only safe VFR arrival is from the south and west, through the proposed TDA. There are no IFR arrivals, departures or approaches to Oban. The nature of the weather in the Western Isles is such that aircraft are regularly required to operate as low as 500 ft amsl over the sea to allow them to satisfy VFR criteria, remaining clear of cloud with surface in sight. Our standard operating weather limits for the Hebridean operation are a minimum cloudbase of 550 ft and 3000m visibility.

I note that the UAS will operate at up to 400 agl, which is the current vertical limit of the proposed TDA. To provide an adequate safety margin I would expect any aircraft crossing the TDA to apply a minimum vertical separation of 500 ft. This in effect drives a minimum altitude of 900 ft and cloudbase of 1000 ft. This represents a significant increase to our operating minima, which is likely to impact on our ability to deliver our schedule.

Our proposed mitigations build on the work conducted by already shared by Skysports, and reflects consultation with the Hebridean Air Services pilot and Airtask Chief Training Captain, in addition to Operations, Flight Operations and Safety Manager.

Mitigations and Proposals

1. The upper limit of the TDA be raised to allow for a 500 ft vertical separation from the maximum proposed operating altitude of the UAS. I understand that this is 400 agl when the UAS enters its emergency mode, therefore an upper limit of 900 ft agl would seem appropriate (therefore 900 ft amsl in TDA2, the western overwater segment) This more adequately represents the impact of the TDA, and provides a margin of separation for crossing traffic.
2. Oban Airport should provide a Danger Area Activity Information Service to enable information on the status of UAS activity to be passed in realtime. Robust communications arrangements should be put in place between the airport and the UAS operator. Alternatively, the UAS operator should provide a DAAIS directly on a promulgated VHF frequency; however we consider the airport option to be preferable. We regard a DAAIS or equivalent as essential to accommodate changes of schedule by either party, and to provide information to aircraft in distress, diversion or operating on behalf of the emergency services.
3. UAS activity should cease and the TDA be declared inactive whenever commercial passenger operations to and from Oban airport are scheduled. An appropriate safety

margin should be applied either side of planned departure and arrival times. For our scheduled operations we **request** that UAS activity ceases as follows:

FROM Oban: ETD Oban -15 min to ETA Destination +15 min

TO Oban: ETD Airfield of Departure -15 min to ETA Oban +15 min

This period is to allow for the possibility of the aircraft encountering poor weather and having to return to Oban, or for reroute and delay due to poor weather being encountered en-route.

Note that our services also operate intra-island, for example from Islay to Coll. We would **prefer** the UAS to be grounded during these flights also, to allow for the possibility of diversion to Oban. However, recognizing the importance of this UAS trial during the current emergency, we are content for UAS activity to continue during intra-island flights, provided the DAAIS is provided as described above.

4. A robust deconfliction and airspace management process needs to be in place to enable ourselves and other operators to signal our schedules and airspace requirements in advance. As suggested by Skysports, the process could require operators to submit planned movements by an agreed time the previous working day, with an agreed protocol to update planned movements on the day of operation.
5. We would wish to see an explicit recognition of the **primacy** of commercial scheduled air transport operations, provided these have been notified through the agreed process the previous working day. This is to enable us to provide confidence to our passengers that a given service will operate. If this recognition is not forthcoming, we would wish to see some form of independent arbitration to decide tactical airspace use. Bluntly, we do not think it fair or reasonable that these decisions are left in the hands of the UAS operator only.

We would expect that the above points will be addressed in a mutually agreed Tactical Operating Instruction, note that we have not had sight of any updates to this document and these remarks are based in the original version received on 27/04/20.

Remarks and Conclusion

Airtask is confident that, provided the measures suggested above are implemented, that it should be possible to safely and efficiently mix manned and unmanned air operations without significant detriment to both. We expect our activity levels during the period to be fairly low and, with flexibility, goodwill and close liaison between operators, we are broadly content that operational and safety impacts can be managed to tolerable levels.

We understand the potential benefits of unmanned deliveries to the communities we support, and, subject to implementation of the caveats and procedures suggested above, are fully supportive of this initiative.

Personnel Consulted:

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Appendix D: Email from Hebridean Air Services (Air Task Group)

[REDACTED]

From: [REDACTED]
Sent: 18 May 2020 15:45
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: ACP-2020-038 Airspace Change Proposal: UAS BVLOS in Segregated Airspace - Formal Stakeholder Engagement

Follow Up Flag: Follow up
Flag Status: Completed

[REDACTED]

Thank you for sight of the attached TOI and deconfliction procedures.

In my previous informal response on Friday I stated the following:

I have no adverse comment on the TOI. Regarding the deconfliction procedure:

On the Day 0 07:45 blue box I believe there is a typo – should read <900 ft
Regarding outbound flights, you have phrased it in the flow chart and RH column ‘until information received from Oban Information that Hebridean has reached its destination +15 min’ I feel we can give you a little back here. It should read ‘Until Hebridean ETA destination + 15 min, or confirmation received from Oban Information that aircraft has landed’. If you have positive confirmation from Oban or direct from ourselves that we’re on deck at destination, there’s no need to wait another 15 minutes. The ETA + 15 stipulation was really to cope with an absence of comms. Hope that makes sense?

The procedure accepts the primacy of our scheduled operation, and gives our pilot authority to make the weather-based decision on whether deconfliction is required. It also will cater for an unscheduled return to Oban in the event of adverse weather or an emergency, and provides real-time safety of flight information through Oban Information. With these safety pillars in place I am content that we can safely and efficiently co-exist. I have no further objection.

As ever, devil will lie in the detail and starting this week we should look to foster a close working liaison between ourselves, your team and Oban Airport. You can be assured of our goodwill in making it work.

Kind regards,

[REDACTED]



The information transmitted, including attachments, is intended only for the person(s) or entity to which it is addressed and may contain confidential and/or privileged material. Any review, retransmission, dissemination or other use of, or taking of any action in reliance upon this information by persons or entities other than the intended recipient is prohibited. If you received this in error please contact the sender and destroy any copies of this information.

Appendix E: Maritime and Coastguard Agency

From: [REDACTED]
Sent: 12 May 2020 17:01
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: ACP-2020-038 Airspace Change Proposal: UAS BVLOS in Segregated Airspace - Formal Stakeholder Engagement

Hello [REDACTED],

I have reviewed the link to the CAA ACP and that does not affect us as we can deconflict or suppress for Search and Rescue Operations.

I supplied you with a template for the drone operation in Southampton and was looking for something on par with that, as the CAA are, as I understand.

I would prefer some more detail on process and confidence in separation/deconfliction before I publish a TOI.

Regards

[REDACTED]

[REDACTED]

Maritime & Coastguard Agency
National Maritime Operations Centre (NMOC) HM Coastguard

[REDACTED]

 Maritime & Coastguard Agency |  HM Coastguard

Appendix E: Oban & The Isles Airport



Name	██████████
Organisation name	Oban Airport
Position in the organisation	██████████
Email	██████████

Feedback:

As the operation is due to take place out with the airports FRZ and ATZ, it does not directly affect the airport itself. That said, it does take place in an area known to be on the approaches to the airport and in particular to flights carried out by the scheduled aircraft transiting from Oban to Colonsay. The proposed flight levels should be sufficient to avoid any conflict as the drone will be mostly flying at a maximum of 400ft. The highest portion of the flight seems to be over the built up area of Oban itself.

Having consulted with my Senior AFISO, we have concluded that the best practice would be to inform Oban Airport prior to, and following, any flight so we can notify by radio, any aircraft operators in the vicinity that we are aware of.

Due to the current state of the lockdown, it is possible that light aircraft could be operating from the airport for the purpose of maintenance which allows them to fly for up to 30min, at 10NM from the airport and therefore if any activity like this does take place, we can notify them also by radio.

I would also recommend two other points. All flights take place between certain daytime hours when the airport is operating, and the notification to the Safety of life services who operate helicopters in the area. Of not is also the operator of the Northern Lighthouse Board helicopter which have a landing pad at the South side of Oban bay.

Finally, I feel it prudent to mention that when the airport is operating normally, the tower is staffed by a duty AFISO providing a Basic service and not a de-confliction service.

OFFICIAL



Name	██████████
Organisation name	Police Scotland
Position in the organisation	██
Email	██

Feedback:

Hello ██████,

I have dedicated what time I can, given the short timescale.

I'm sure you'll have thought of the following points, but I will mention them for your consideration.

Engagement

I note the list of key stakeholders, but wondered if any engagement had taken place with the following;

- Local/National unmanned aircraft associations/clubs or businesses,
- Royal Navy
- MoD Police
- Caledonian MacBrayne Ferries
- Local Marine Centres (other than the ferry terminal e.g. Oban Marina)
- Wildlife Centres (Mull eagle watch centre)

I'm sure you will appreciate why I ask about some of the engagement above in terms of aviation and marine safety and security, but endangering wildlife may constitute criminal offences, so I'm keen to raise legislation, other than aviation related legislation, which will have to be accounted for in any decision making process. Please ensure you don't expose yourself to complaints from interest groups that your operation breaches legislation relevant to the environment in which you seek to operate.

I'm sure you have engaged with the Ferry companies to consider de-confliction of marine traffic with your flights, but I just as another example of what I'm thinking.

Aircraft activity

I know you and the CAA will have engaged with representatives from organisations using manned aircraft and I have suggested consulting unmanned aircraft associations etc. I spoke with you about known aircraft (particularly unmanned aircraft) use by private individuals, e.g. holiday makers, locals etc.

You usually do have unmanned aircraft activity in the area you propose for these flights, which is obviously weather dependent, like your flights. We think these are present from the ground level to well above 400 feet. Experience since 2015 leaves me concerned that consideration should be carefully given to the type of restriction you wish to place in your volume of airspace, which gives you the best opportunity to mitigate the likelihood of a collision with another unmanned aircraft.

You will overfly several points of interest to members of the public, who may well seek to fly unmanned aircraft, without notice. Many members of the public will not check if a NOTAM notifying any kind of airspace restriction is in place before flying a drone – we have dealt with

OFFICIAL

dozens this week alone in exactly this position. I would urge both you and the CAA to consider obtaining an appropriate restriction to justify the creation of a 'Geofence'. It is my experience that it can take at least four to five weeks to influence 'pattern of life' behaviour when it comes to unmanned aircraft use in a given area. Usually a Restricted Area (Temporary) is required to have a Geofence created. It is my suggestion that this is considered prior to these flights taking place.

Just some of the sites of interest for UAV flight on your proposed flightpath are;

- Duart Castle,
- Craignure Golf Club
- Oban Marina,
- Ferry Terminals at Oban and Craignure,
- Hutcheson's Monument, etc....

As I say, the planning the average drone pilot puts in will not come close to your planning, I assure you. I know you will likely have considered all this too.

I note that your height of operations is maximum 720 feet, above the surface I presume until you're west of Oban, reducing to 400 feet above the surface all the way to the hospital.

I would submit that plan will potentially put you in conflict with other unmanned aircraft traffic. I would look for technical mitigation to reduce the risk as far as is possible, but it's only a suggestion. I will say once again that such measures take time to have optimum effect and need to be managed over the implementation phase.

Air Accidents

In the event of an air accident in the area of your operation, Police Scotland Air Accident and Incident Advisors will liaise with the Air Accidents Investigation Branch and provide initial expertise and attendance ahead of industry experts.

To that end, can I respectfully suggest you consider the provision of details of the materials and systems on board your unmanned aircraft, making clear what may be present which constitutes a hazard in an accident scene? We would quickly need access to an appropriate aircraft hazard list and your manifest, list should we attend such an air accident.

Flying Operations

In Scotland, many commercial operators of unmanned aircraft contact the Aviation Safety and Security Unit ahead of planned operations, to provide information ahead of their operation.

Can I suggest it may be a good idea to contact 101 and have a Police Incident raised each time you fly and that you note the Police Scotland incident reference?

Whilst you do not need to do this, such notification

- lets our control rooms know about your ongoing activity,
- allows our controllers to answer any complaints from the public and allay fears without necessarily sending officers to respond to your location in response to activities which are perfectly legal and do not require police attention.
- Assists with a quicker response to any incident you may have by predetermining your location and an understanding of the activities there

OFFICIAL



As I say, there is obviously no legal obligation on you to do this, but we've found it is helpful to both parties, where such co-operation takes place.

If you decide to notify us of each of your activities, it would be useful for us to have details of

- your UAS reference,
- any relevant operator ID,
- Insurance details,
- Details from your Permission for Commercial Operations and/or other specific permission,
- Flight times,
- Crew details at both ends of the flight operation and
- Emergency contact details.

With regards to take-off and landing sites and things like sanitising the aircraft prior to flight etc., I'll leave that aspect to the CAA staff and your own expertise to iron out, but it would be good to understand those arrangements and processes prior to your flights. I would also be interested in visiting your operations – to better inform an air accident response.

Sorry [REDACTED], but I have been unable to consider anything else and I'm sure I'll have forgotten to mention something. I'm sure you will have thought of much of the above anyway.

If you require to contact me regarding the above, you have my contact details. I would be pleased to help if I can.

The very best of luck with this. I can only speak for myself when I say, anything to support our NHS partners in this current health emergency is a great thing. I hope some of this is a help.

OFFICIAL

Appendix G: Scottish Air Ambulance

[REDACTED]

From: [REDACTED]
Sent: 11 May 2020 18:59
To: [REDACTED]
Subject: Re: Reminder - ACP-2020-038 Airspace Change Proposal: UAS BVLOS in Segregated Airspace - Formal Stakeholder Engagement

Hi [REDACTED],

I was not planning to formally respond myself and had passed your email on to Babcock MCS & Gama Aviation (our aircraft operators) on my behalf. They are aware what is required of them to deliver our service, but if you feel it would be useful to have further input from myself (bearing in mind I have no aviation expertise to bring to the submission) then I would be able to do so tomorrow morning.

Regards,

[REDACTED]

[REDACTED]

[REDACTED] Air Ambulance Division
SCOTTISH AMBULANCE SERVICE

[REDACTED]

Appendix H: The Scottish Association for Marine Sciences (SAMS)



Name	[REDACTED]
Organisation name	The Scottish Association for Marine Science
Position in the organisation	[REDACTED]
Email	[REDACTED]

Feedback:

SAMS
Scottish Marine Institute
Oban



[REDACTED]
[REDACTED]

The Scottish Association for Marine Science (SAMS) 100% supports Skyports in its application for the proposed temporary danger area (TDA) spanning Oban to Mull.

Skyports has shown to be exemplary in communication, Knowledge exchange and engaging with SAMS as Stakeholder.

SAMS has long recognised the potential for beyond visual line of sight (BVLOS) testing of small unmanned aircraft (SUA) in the local area and wider Argyll and we welcome this proposal for the outlined TDA and supportive SUA operations.

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Appendix I: Ministry of Defence



Name	Defence Airspace and Air Traffic Management
Organisation name	Ministry of Defence
Position in the organisation	[REDACTED]
Email	[REDACTED]

Feedback:

The MOD have no objections to the proposed TDA.

Please continue to provide us with as much detail as possible throughout the activities utilising the email address noted above. All information will be distributed via the appropriate channels.



ACP-2020-038 - UAS BVLOS in Segregated Airspace
Targeted Engagement with Aviation Stakeholders
Response Form

Dear Stakeholder,

Skyports has reached the stage in its temporary airspace change application process for formally engage target aviation stakeholders with our plans to establish a Temporary Danger Area (TDA) during notified periods to enable the safe testing and demonstration of UAS BVLOS during a proof of concept operation to transport medical equipment by small unmanned aircraft (SUA) from one healthcare facility to another in Argyll on the west coast of Scotland. The operation is provided support the National Health Service (NHS) and UK Government responses to the COVID-19 through the provision of necessary equipment to front-line healthcare staff.

This response form will enable you to provide feedback on our proposals detailed in the *Targeted Engagement with Aviation Stakeholders* document, which can be found on the CAA Airspace Change portal.

How to respond

Please download and save this document to your computer, completed the section below with your feedback and return the form to [REDACTED].

In addition to this Word file, we will accept scanned, hand-written responses or email responses as long as they are legible.

It is important that individual email responses clearly show your name and contact details; this will allow us to cross reference emails we send out.

You may respond directly to CAA Airspace Regulation, who will share your feedback with Skyports.

Please respond by: **17:00 on Tuesday 12 May 2020.**

Feedback

All feedback provided, whether by email or completion of this form, will be uploaded to the CAA Airspace Change Portal and shared with the CAA in its original form, albeit with personal and contacts details redacted in order to protect your privacy.

Many thanks in advance for taking the time to provide feedback on our proposals.

Yours faithfully

Skyports

Appendix K: Skyports target engagement aviation stakeholder example email (redacted)

██████████

From: ██████████
Sent: 08 May 2020 14:43
To: ██████████
Subject: ACP-2020-038 Airspace Change Proposal: UAS BVLOS in Segregated Airspace - Formal Stakeholder Engagement
Attachments: Skyports - Oban-Isle of Mull - Targeted Stakeholder Engagement.pdf; Skyports - Oban-Isle of Mull - Engagement Response.docx

Dear ██████

Firstly, thank you for all the feedback on our original temporary airspace change proposals during the informal stakeholder engagement exercise.

Secondly, I am pleased to provide you with an update on the status of the application. This week, we had our Assessment Meeting with CAA Airspace Regulation, after which were approved by the CAA to proceed to formal targeted aviation stakeholder engagement on our proposals. As part of the CAA assessment and pre-engagement stage, we shared with the CAA the feedback we received on our original designs and how we have taken into account this feedback to redesign our proposed change. The conclusion of the CAA is that we would need a TDA for what we are proposing to do.

Targeted Stakeholder Engagement

All the documents related to our formal targeted aviation stakeholder engagement exercise can be found on the CAA Airspace Portal.

Skyports Ltd

UAS BVLOS in Segregated Airspace

IN PROGRESS

ID: ACP-2020-038

This proposal is for a Temporary airspace change, and is level TBC.

Created: 07 May 2020

Last updated: 08 May 2020

<https://airspacechange.caa.co.uk/PublicProposalArea?plD=244>

In case you experience any problems with the Portal, I attach the engagement document and a response form, though you may of course simply email me back if you prefer. And you may, of course, email CAA Airspace Regulation directly with your feedback, who will forward this to us, if you wish.

As you'll recall, the timescales for this change are tight due to the Covid-19 imperative, so the deadline for responses is **17:00 on Tuesday 12 May 2020**.

Deconfliction process

We are in the process of improving our deconfliction process based on the feedback received and have a requirement from CAA Airspace Regulation as part of the airspace change process and from the CAA UAS Team as part of the safety approval process to have one in place that is supported in writing or by signature by relevant parties before the TDA is in place and before we can operate.

Updates

I will keep you up-to-date along the way and you also may wish to sign up to receive email updates about this airspace change (at the link above).