



BVLOS TRIAL IN NON- SEGREGATED AIRSPACE

*Trial Plan Part 1: Addendum to Appendix C
Additional Engagement Post CAA
Submission*

EMAIL CORRESPONDENCE - BRITISH MICROLIGHT AIRCRAFT ASSOCIATION

RE: PROPOSED TEMPORARY DANGER AREA AT GOODWOOD AERODROME – APRIL-SEPTEMBER 2021 - FEEDBACK REMINDER

[REDACTED]
Fri 29/01/2021 10:28

To: Goodwood BVLOS <goodwoodbvlos@traxinternational.co.uk>

📎 1 attachments (29 KB)

ACP Response.docx;

Good morning.

I realise this response is late, but ask that it is considered in your review of feedback.

Regards

[REDACTED]
CE

[MICROLIGHTS GO TO 600KG – MORE INFO + FULL FAQ HERE](#)

British Microlight Aircraft Association – The natural home of microlights



From: Goodwood BVLOS [mailto:goodwoodbvlos@traxinternational.co.uk]

Sent: 08 January 2021 16:45

Subject: PROPOSED TEMPORARY DANGER AREA AT GOODWOOD AERODROME – APRIL-SEPTEMBER 2021 - FEEDBACK REMINDER

Good Afternoon,

A reminder that the deadline for feedback on this project is **Friday 15th January 2021**. If you have not already done so, or have any questions, please get in touch with the project at goodwoodbvlos@traxinternational.co.uk

A copy of the original email is below and attached is a copy of the engagement material.

Kind Regards,

[REDACTED]
Mob: [REDACTED]

Web: www.traxinternational.co.uk



Dear [REDACTED]

I have been asked by members of the British Microlight Aircraft Association (BMAA) to respond in some detail to the ENGAGEMENT ON THE ESTABLISHMENT OF A TEMPORARY DANGER AREA ACP-2020-082. I realise that the published date for responses has passed but understand that even at this late stage any comment will be considered.

- 1) We are concerned that the period available for consultation has been truncated, which, particularly in these difficult times has made it more difficult for associations such as ours to gather local information from members who may be directly affected by the proposal. This shortened timescale is not unique to this ACP but becoming the norm among similar ACPs. We have, through the General Aviation Alliance (GAA), made this a complaint to the UK CAA for all such ACPs.
- 2) The purpose of a Temporary Danger Area (TDA) is to allow for short term projects for which permanent segregated airspace is unnecessary. The proposal to extend the Goodwood TDA in excess of 90 days is not appropriate for a TDA, especially in such a busy area as the south of England. We do not support the proposed extension beyond 90 days.
- 3) The proposed TDA is a circle of 5 nautical miles centered on Goodwood aerodrome. Given the nature and inherent risks of the planned operations it is unlikely that drone flights will go south of the aerodrome and operate over the more populated areas of Chichester and towards Bognor Regis. We propose that the area of the TDA is restricted to the semicircle, 5 miles radius, to the north of Goodwood and the remaining southern portion of the Goodwood ATZ. This change in dimension will enable local flights to operate more easily and be less likely to need to penetrate the TDA. Reducing the volume of the TDA will also decrease the likelihood of infringement during active hours.
- 4) Initial operation of the TDA. If the TDA is established it is imperative that it is only unavailable for other traffic for the minimum period. To achieve this it must only be activated by NOTAM when flying is confirmed to take place and only for the period of those planned flights. The TDA must not be routinely activated on an "in case we need it" basis. Targeted timing is implied in your engagement document and must form part of the operating procedures.
- 5) Activity information. We note that a Danger Area Activity Information Service (DAAIS) will be provided by a Goodwood AFISO during TDA active periods. For flexibility we wish to see a procedure that allows, during activation periods but when flying is not taking place, other aircraft allowed to fly within the TDA. The TDA must offer the greatest flexibility.
- 6) TMZ. We understand that should your trial be successful a further trial within a TMZ is envisaged. Many of our members fly without a Mode S transponder and would be further disadvantaged if other means of gaining entry, such as a Letter of Agreement or arrangements for entry following a radio call, are not included in the operation procedures for a TMZ.

[REDACTED]
CE BMAA

29/01/2021

RE: PROPOSED TEMPORARY DANGER AREA AT GOODWOOD AERODROME – APRIL-SEPTEMBER 2021 - FEEDBACK REMINDER

[REDACTED]
Fri 29/01/2021 14:13

To: Goodwood BVLOS <goodwoodbvlos@traxinternational.co.uk>

Hi [REDACTED]
om at 1500 today if that is convenient for you.

[REDACTED]
CE

[MICROLIGHTS GO TO 600KG – MORE INFO + FULL FAQ HERE](#)

British Microlight Aircraft Association – The natural home of microlights



From: Goodwood BVLOS [mailto:goodwoodbvlos@traxinternational.co.uk]

Sent: 29 January 2021 12:56

To: [REDACTED]

Subject: Re: PROPOSED TEMPORARY DANGER AREA AT GOODWOOD AERODROME – APRIL-SEPTEMBER 2021 - FEEDBACK REMINDER

Dear [REDACTED]

Thank you for the feedback. This morning we submitted our application for the first part of the trial within a TDA to the CAA for their consideration, ahead of your email arriving.

Could we arrange a call to discuss your concerns and requests as soon as possible? Would you be available for a Teams or Zoom call, perhaps 45 minutes?

Today -1400-1600

Mon 1st Feb - 1100-1300

Tue 2nd Feb - 1000-1400

Thu 4th Feb - 1100-1300

Kind Regards,

[REDACTED]
Mob: [REDACTED]

Web: www.traxinternational.co.uk



Re: PROPOSED TEMPORARY DANGER AREA AT GOODWOOD AERODROME – APRIL-SEPTEMBER 2021 - FEEDBACK REMINDER

Goodwood BVLOS <goodwoodbvlos@traxinternational.co.uk>

Mon 01/02/2021 12:11

To: [REDACTED]

Dear [REDACTED]

Thank you very much for your time on Friday. In this email we hope to summarise our conversation and answer the questions you asked in your email.

1. We are concerned that the period available for consultation has been truncated, which, particularly in these difficult times has made it more difficult for associations such as ours to gather local information from members who may be directly affected by the proposal. This shortened timescale is not unique to this ACP but becoming the norm among similar ACPs. We have, through the General Aviation Alliance (GAA), made this a complaint to the UK CAA for all such ACPs. This ACP is to initially establish a TDA and the CAA ask the sponsor to carry out targeted engagement, rather than a formal consultation. They allow the engagement to be scaled to a maximum of 6 weeks and suggest it should be targeted to airspace users. For this project we have engaged with airspace users, local aviation industry and local non-aviation industry stakeholders and began our engagement on 10th December 2020, our official deadline for feedback was 15th January 2021, which was a 5-week feedback period. However, we have been responding to feedback beyond this date, up until the date we submitted our Trial Plan to the CAA on Friday 29th January 2021. For the next phase of the project, the establishment of a temporary TMZ we have proposed an 8-week consultation period and asked our stakeholders to provide us with feedback on that timeframe. We would welcome your thoughts on those timescales.
2. The purpose of a Temporary Danger Area (TDA) is to allow for short term projects for which permanent segregated airspace is unnecessary. The proposal to extend the Goodwood TDA in excess of 90 days is not appropriate for a TDA, especially in such a busy area as the south of England. We do not support the proposed extension beyond 90 days. We have requested that our TDA able to be activated over a 5-month period. As we discussed online on Friday, this extension is because we will be conducting our trial outside of Goodwood operating hours to minimise disruption. The TDA will not be active every day and we have agreed that it will not be active for more than 90 days over that 5-month period, but we expect it to be less than this. We will endeavour to perform testing in the pre-0900 period wherever possible.
3. The proposed TDA is a circle of 5 nautical miles centered on Goodwood aerodrome. Given the nature and inherent risks of the planned operations it is unlikely that drone flights will go south of the aerodrome and operate over the more populated areas of Chichester and towards Bognor Regis. We propose that the area of the TDA is restricted to the semicircle, 5 miles radius, to the north of Goodwood and the remaining southern portion of the Goodwood ATZ. This change in dimension will enable local flights to operate more easily and be less likely to need to penetrate the TDA. Reducing the volume of the TDA will also decrease the likelihood of infringement during active hours. As shown to you on Friday, due to limitations of where the drone can fly and the landing sites, we have available to us, we need to keep options to the south of Goodwood Aerodrome. We have had detailed discussions with a number of local stakeholders, including Lasham Gliding Club, Bognor Regis Gliding Club and Sky Surf Club and have amended our TDA dimensions from the original shown in the engagement document. We discussed the possibility of two semi-circles rather than a circle, however those stakeholders advised that owing to the limited hours of operation of the TDA, this was not necessary. We discussed that 'segmenting' the TMZ is potentially a requirement for the 2nd part of the trial as the hours of activation will likely be during the day. We also discussed the need for the TDA to be up to 2000', although our drone will generally operate below 1000ft we still want to demonstrate we can integrate the drone with manned aircraft at different heights.
4. Initial operation of the TDA. If the TDA is established it is imperative that it is only unavailable for other traffic for the minimum period. To achieve this it must only be activated by NOTAM when flying is confirmed to take place and only for the period of those planned flights. The TDA must not be routinely activated on an "in case we need it" basis. Targeted timing is implied in

your engagement document and must form part of the operating procedures. The TDA will not be active every day, only when it is required by the project and will always be NOTAM'd a minimum of 24hrs in advance.

5. Activity information. We note that a Danger Area Activity Information Service (DAAIS) will be provided by a Goodwood AFISO during TDA active periods. For flexibility we wish to see a procedure that allows, during activation periods but when flying is not taking place, other aircraft allowed to fly within the TDA. The TDA must offer the greatest flexibility. As a lot of our testing can be carried out within Visual Line of Sight, we will only be activating the TDA when we need to.
6. TMZ. We understand that should your trial be successful a further trial within a TMZ is envisaged. Many of our members fly without a Mode S transponder and would be further disadvantaged if other means of gaining entry, such as a Letter of Agreement or arrangements for entry following a radio call, are not included in the operation procedures for a TMZ. We will be investigating if this can be a dynamic TMZ, rather than H24 and will look into the possibility of Letters of Agreement (LoAs) between appropriate airspace users. We advised that we expect the carriage of CAP1391 approved devices will enable access to the TMZ not just Mode S transponders. Also, the temporary TMZ is planned to be in place for late-September-December 2021, so we are hoping that activation in the winter months will lessen the impacts on GA.

During our discussion we also talked about the timings of the TDA, which following discussion with stakeholders has now been changed to 1800 onwards. We also discussed activation of the TDA at weekends - we confirmed this is less likely, due to the UAV operators' schedules, however it will depend on how much of the trial can be carried out during the week and our need to balance impacts on airspace users with impacts on the local community.

To minimise impacts on your members we would also be interested in learning of any local areas that have high activity or if there are any competitions planned, we can then plan to work around these if possible?

As we discussed online, we submitted our proposal to the CAA on the morning of Friday 29th January 2021, prior to receiving this email. However, we will forward them our correspondence and it will also be redacted and included in our project information to be uploaded onto the CAA portal here, later this week.

I hope we have answered your questions if you have anything further, including thoughts on the temporary TMZ or potential LoAs please do get in touch.

Kind Regards,

[Redacted Signature]

Mob: [Redacted]

Web: www.traxinternational.co.uk



EMAIL CORRESPONDENCE - HADFOLD FARM AIRFIELD/SOUTHERN FLYERS

Re: ACP-2020-082

[REDACTED]
Fri 29/01/2021 19:12

To: Goodwood BVLOS <goodwoodbvlos@traxinternational.co.uk>

Cc: [REDACTED]

Dear [REDACTED],

On behalf of our group of microlight and LSA operators based at Hadfold Farm and also the group known as Southern Flyers that encompasses other mainly microlight operators based at several small farm strips around West Sussex, I would like to submit the following comments on your ACP-2020-082. I would ask that since we only became aware of the ACP last week that although this is after your engagement close date of 15 January that you still include this within your further assessments.

1. As pilots who operate regularly within the airspace you propose to have the TDA cover we are very aware, from many years experience flying there, how busy it is with mixed GA VFR traffic, particularly during the months proposed for your trials - prime recreational flying period. Particularly the east-west-east routing close to the coast, with Shoreham and the Isle of Wight airfield transit traffic so close. We are extremely concerned that during times of activation this would create dangerous 'pinch points' along the coast. This would especially be pertinent during the evening periods you are proposing; post-1700LT during those months is still a busy time, with flyers returning from day trips out.
2. The evening periods are particularly important flying times for very light aviation pilots - Single Seat Dereglated (SSDR) aircraft and paramotors - when winds are often light. These types usually are unable to carry transponders and often not even radios so rely on access to Class G airspace in low terrain areas - exactly what the coastal land area south of Goodwood provides. Thus the TDA activated in that area during the evenings would curtail such operations.
3. Considering the above points, together with the many built up areas under the southern half of your proposed TDA where you say you would be avoiding, we suggest that it would be preferable to restrict your TDA to a semi-circle covering the north of the TDA. Or at minimum to truncate the TDA in the south, leaving a much wider and safer corridor for recreational aviation and thus avoid creating an increased collision risk. We feel it essential that this risk is demonstrably mitigated. This proposal is to create a TDA in what is some of the busiest GA airspace in the UK so it is vital this issue is giving full and careful consideration and including the widest number of local airspace users in the engagement to fully understand the risks.
4. I do gather that you have recently stated that it would be rare for the TDA to be activated over weekends and public holidays, which is sensible. I would suggest that you make yourselves aware of any dates for special events in the region, which could increase other GA traffic. Generally those are likely to be weekends too so hopefully less chance of the TDA being active. E.G. there is an annual microlight fly-in at Sandown, on the IOW. I'm not sure of proposed dates for that in 2021 (indeed if it's able to go ahead this year due to the pandemic) but I know you have included Sandown on your engagement list.
5. We have been extremely concerned at your lack of adequate engagement thus far, and especially with your previous application (ACP-2020-12), which was only aborted due to the pandemic and which we, as a local airfield and as members of a national organisation, had no idea about. We are shocked by the lack of adherence to the CAP1616 regulations and the Policy Statement on Permanently Established Danger Areas & Temporary Danger Areas, including that the CAA have not upheld those regulations. We shall be drawing that to the attention of the CAA and the Transport Minister. The regulations state that the CAA will expect to see evidence of engagement so we would ask what evidence you presented and what records of engagement you are keeping? Additional you must provide evidence that you have taken into account feedback from engagements in modifying your proposal. And that stakeholders are content that our views have been captured and taken into account.
6. Whilst I understand that the CAA have said the TDA should be established in accordance with the Policy Statement referred to above, nevertheless, once the discussions have moved on the TDA will be subject to the requirements of the ACP detailed in CAP1616 regulation.

We are aware that this response comes after your official closure date for engagement but considering the lack of information and reaching out to sufficient local and national groups prior to that date we do wish to see this response included in your submissions to the CAA.

We look forward to being included in the 2-way discussions going forward. Our group have much and varied experience in flight operations in the local area so I'm sure we can bring that experience to assist in your trials. Several of us have broader experience in the wider aviation industry and in aero modelling so we do look at these issues from several directions. Do let me know when you are ready to do discuss anything further.

K

[REDACTED]

Sent from my iPad

On 25 Jan 2021, at 15:09, Goodwood BVLOS
<goodwoodbvlos@traxinternational.co.uk> wrote:

Dear [REDACTED]

Thank you very much for getting in touch. I will add both you and [REDACTED] to our list of stakeholders, so you will be included in all future correspondence. We had contacted NATMAC, which is the National Air Traffic Management Advisory Committee and includes the Light Aircraft Association, British Gliding Association, British Microlight Aircraft Association, and lots of other aviation industry bodies, so apologies that the information had not reached you.

Please find attached a copy of the engagement document we sent out to stakeholders. Although the deadline for feedback has now passed, please do get in touch if you have any questions. You can also find more information on our ACP on the CAA Portal [here](#).

Kind Regards,

[REDACTED]

Mob: [REDACTED]

Web: www.traxinternational.co.uk

[REDACTED]

Re: ACP-2020-082

Goodwood BVLOS <goodwoodbvlos@traxinternational.co.uk>

Mon 01/02/2021 12:21

To: [REDACTED]
Cc: [REDACTED]

Dear [REDACTED],

Thank you very much for your email. Unfortunately, we submitted our proposal to the CAA on the morning of Friday 29th January 2021, prior to receiving your email. However, please find our response to your email below in blue. We will forward our correspondence to the CAA so they have sight of everything, and it will be redacted and included in our project information which will be uploaded onto the CAA Portal here, later this week.

If you have any further questions, please do get in touch.

Kind Regards,

[REDACTED]

Mob: [REDACTED]
Web: www.traxinternational.co.uk



From: [REDACTED]
Sent: 29 January 2021 19:12
To: Goodwood BVLOS <goodwoodbvlos@traxinternational.co.uk>
Cc: [REDACTED]
Subject: Re: ACP-2020-082

Dear [REDACTED],

On behalf of our group of microlight and LSA operators based at Hadfold Farm and also the group known as Southern Flyers that encompasses other mainly microlight operators based at several small farm strips around West Sussex, I would like to submit the following comments on your ACP-2020-082. I would ask that since we only became aware of the ACP last week that although this is after your engagement close date of 15 January that you still include this within your further assessments.

1. As pilots who operate regularly within the airspace you propose to have the TDA cover we are very aware, from many years experience flying there, how busy it is with mixed GA VFR traffic, particularly during the months proposed for your trials - prime recreational flying period. Particularly the east-west-east routing close to the coast, with Shoreham and the Isle of Wight airfield transit traffic so close. We are extremely concerned that during times of activation this would create dangerous 'pinch points' along the coast. This would especially be pertinent during the evening periods you are proposing; post-1700LT during those months is still a busy time, with flyers returning from day trips out.

2. The evening periods are particularly important flying times for very light aviation pilots - Single Seat Deregulated (SSDR) aircraft and paramotors - when winds are often light. These types usually are unable to carry transponders and often not even radios so rely on access to Class G airspace in low terrain areas - exactly what the coastal land area south of Goodwood provides. Thus the TDA activated in that area during the evenings would curtail such operations. Thank you very much for the information, we have been in discussions with Lasham Gliding Club, Bognor Regis Gliding Club and local paragliders to learn more about the popular local areas. We

have amended the shape of our TDA to the north and to the south east to accommodate certain activities and the TDA operating hours are limited to post 1800 local time. To further mitigate the impact of the TDA on other airspace users, we will endeavour to perform as much testing as possible in the morning slot (pre-0900) noting that we have to balance impacts on GA against the impacts of noise on local communities on the ground.

3. Considering the above points, together with the many built up areas under the southern half of your proposed TDA where you say you would be avoiding, we suggest that it would be preferable to restrict your TDA to a semi-circle covering the north of the TDA. Or at minimum to truncate the TDA in the south, leaving a much wider and safer corridor for recreational aviation and thus avoid creating an increased collision risk. We feel it essential that this risk is demonstrably mitigated. This proposal is to create a TDA in what is some of the busiest GA airspace in the UK so it is vital this issue is giving full and careful consideration and including the widest number of local airspace users in the engagement to fully understand the risks. We had a meeting with the British Microlight Aircraft Association on Friday, who raised this same point. As discussed with BMAA, due to limitations of where the drone can fly and the landing sites we have available to us, we need to keep options to the south of Goodwood Aerodrome available for testing. We have had detailed discussions with a number of local stakeholders, including Lasham Gliding Club, Bognor Regis Gliding Club and Sky Surfers Club and have amended our TDA dimensions from the original shown in the engagement document (see image below). We discussed the possibility of two semi-circles rather than a circle, however those stakeholders advised that owing to the limited hours of operation of the TDA, this was not considered necessary however, they advised that 'segmenting' the Temporary TMZ is more likely to be a requirement for the 2nd part of the trial as the hours of activation could be during the day. Whilst we will be consulting on the specifics of the Temporary TMZ later this year, we would very much welcome thoughts from you on the shape below in advance and any particular areas of specific concern, such as to the south where you mention potential pinch points. Please note that we expect the carriage of CAP1391 approved devices will enable access to the Temporary TMZ not just Mode S transponders.



4. I do gather that you have recently stated that it would be rare for the TDA to be activated over weekends and public holidays, which is sensible. I would suggest that you make yourselves aware of any dates for special events in the region, which could increase other GA traffic. Generally those are likely to be weekends too so hopefully less chance of the TDA being active. E.G. there is an annual microlight fly-in at Sandown, on the IOW. I'm not sure of proposed dates for that in 2021 (indeed if it's able to go ahead this year due to the pandemic) but I know you have included Sandown on your engagement list.

In speaking to local stakeholders, we have asked them to let us know of any key dates for competitions or where increased activity is expected so we can try to plan around them. Please let us know if you have any dates you would like us to be aware of using this email address.

5. We have been extremely concerned at your lack of adequate engagement thus far, and especially with your previous application (ACP-2020-12), which was only aborted due to the pandemic and which we, as a local airfield and as members of a national organisation, had no idea about. We are shocked by the lack of adherence to the CAP1616 regulations and the Policy Statement on Permanently Established Danger Areas & Temporary Danger Areas, including that the CAA have not upheld those regulations. We shall be drawing that to the attention of the CAA and the Transport Minister. The regulations state that the CAA will expect to see evidence of engagement so we would ask what evidence you presented and what records of engagement you are keeping? Additional you must provide evidence that you have taken into account feedback from engagements in modifying your proposal. And that stakeholders are content that our views have been captured and taken into account.

6. Whilst I understand that the CAA have said the TDA should be established in accordance with the Policy Statement referred to above, nevertheless, once the discussions have moved on the TDA will be subject to the requirements of the ACP detailed in CAP1616 regulation.

This project was not part of application ACP-2020-12, that was a separate application made by the Goodwood Aviation Innovation Centre, not related to this UK Research and Innovation project to address CV-19. We began our official engagement, in line with the CAA Policy Statement on Permanently Established Danger Areas & Temporary Danger Areas and the CAP1616 process on Airspace trials, on 10th December 2020 and gave stakeholders 5 weeks to provide us with feedback, although we have been accepting feedback beyond that deadline right up to our submission on 29th January.

In our initial correspondence we reached out to many stakeholders including NATMAC. NATMAC includes representatives from Airspace4All, Airfield Operators Group, British Gliding Association, British Helicopter Association, British Hang Gliding and Paragliding Association, British Microlight Aircraft Association, British Model Flying Association, General Aviation Alliance, Light Aircraft Association and many more. I can only re-iterate from my earlier email our apologies for the information not having reached you. In our submission to the CAA, we have provided copies of all the feedback we have received and all the email correspondence with our stakeholders. Redacted versions of these emails will all be published on the CAA Portal later this week. We have proposed an 8-week consultation period on the temporary TMZ to take place later this year. We would welcome feedback on this 8-week timescale, noting the time pressures on our project from UKRI to deliver results as this project is related to mitigating future impacts of CV19.

We are aware that this response comes after your official closure date for engagement but considering the lack of information and reaching out to sufficient local and national groups prior to that date we do wish to see this response included in your submissions to the CAA.

We will forward our correspondence to the CAA and ensure a redacted version is included in the material which will be published on the portal later this week.

We look forward to being included in the 2-way discussions going forward. Our group have much and varied experience in flight operations in the local area so I'm sure we can bring that experience to assist in your trials. Several of us have broader experience in the wider aviation industry and in aero modelling so we do look at these issues from several directions. Do let me know when you are ready to do discuss anything further.

Thank you very much for this offer and for getting in touch.

[REDACTED]

Sent from my iPad

EMAIL CORRESPONDENCE - [REDACTED]

FW: ACO-2020-082 Drones working with GA?

[REDACTED]
Sun 31/01/2021 09:12

To: Goodwood BVLOS <goodwoodbvlos@traxinternational.co.uk>

Please find the following, sent in response to your request for a TDA at Goodwood.

[REDACTED]

From the mobile [REDACTED]

From: [REDACTED]
Date: 19/01/2021 10:56 (GMT+00:00)
To: Airspace.policy@caa.co.uk
Subject: ACO-2020-082 Drones working with GA?

Dear Sir,

The CAA have published a document "ACO-2020-082 CAA Assessment meeting" which describes proposed commercial drone activities at busy Goodwood Airfield. I can see the establishment of (another) Temporary Danger Area (TDA) and a Transponder Mandatory Zone.

Its aim is claimed to be to develop UAS operations alongside conventional aircraft.

If this is the case and the consortium must develop simulations to prove that UAVs can operate without affecting the environment in which they operate.

Imposition of a Transponder Mandatory Zone imposes an unfair burden on other airspace users, there being no requirement to carry a transponder in class G airspace.

I support commercial drone operation alongside general aviation but only if.

1. The drone operator takes responsibility for isolating the cargo they carry from the environment in which they operate.
 2. The drone operator has no impact on the environment it operates in.
- These conditions are commonly applied in the transport industry.

Commercial drone operations must be developed without relying on the establishment of TDAs and TMZs to remove an unacceptable burden on other airspace users.

"The CAA has a policy of keeping the volume of controlled airspace to the minimum necessary to meet the needs of UK airspace users and to comply with its international obligations.!

<https://www.caa.co.uk/Commercial-industry/Airspace/Airspace-change/Airspace-Change/>

<https://airspacechange.caa.co.uk/umbraco/Surface/DocumentSurface/>

[REDACTED]

Re: ACO-2020-082 Drones working with GA?

Goodwood BVLOS <goodwoodbvlos@traxinternational.co.uk>

Mon 01/02/2021 14:07

To: [REDACTED]

Dear [REDACTED]

Thank you very much for getting in touch. We submitted our proposal to the CAA on Friday 29th January 2021. However, please find the response to the points you raised below which will be forwarded to the CAA. All our engagement has been recorded and will be available on the portal [here](#) later in the week.

Imposition of a Transponder Mandatory Zone imposes an unfair burden on other airspace users, there being no requirement to carry a transponder in class G airspace.

The TMZ phase of this project is planned for late September-December 2021 and will be a temporary airspace arrangement. The purpose of this trial is to reduce the need for TDAs going forwards and enable industry to be able to move towards a less restrictive airspace to enable UAS operations. We understand that a TMZ comes with aircraft equipage requirements, but this would be a progressive step forward over totally segregated operations, we hope you agree. We expect the carriage of CAP1391 approved devices will enable access to the Temporary TMZ not just Mode S transponders which again would be a step in the right direction. We hope that it being during the winter months will limit the impact on other airspace users and we will be investigating the options of a dynamic TMZ rather than H24.

I support commercial drone operation alongside general aviation but only if.

1. The drone operator takes responsibility for isolating the cargo they carry from the environment in which they operate.

For this project, the drones will not be carrying any cargo.

2. The drone operator has no impact on the environment it operates in.

As described above, the ambition of this project is to reduce the impact of UAS operations on other airspace users in the future. However, we understand that to enable a known traffic environment through the utilisation of Electronic Conspicuity does still carry a burden on airspace users.

Commercial drone operations must be developed without relying on the establishment of TDAs and TMZs to remove an unacceptable burden on other airspace users.

To enable such operations requires regulations and rule which in turn, requires trials to collate the evidence. To safely carry out these trials, airspace does need to be segregated. This project aims to develop these operations safely and quickly to minimise the need for segregated airspace in the future.

If you have any further questions, please do get in touch.

Kind Regards,

[REDACTED]

Mob: [REDACTED]

Web: www.traxinternational.co.uk



Re: ACO-2020-082 Drones working with GA?

Tue 02/02/2021 09 02

To: Goodwood BVLOS <goodwoodbvlos@traxinternational.co.uk>

Cc: [REDACTED]

Thank you

Please find inline

From the mobile [REDACTED]

----- Original message -----

From: Goodwood BVLOS <goodwoodbvlos@traxinternational.co.uk>

0:00)

Subject: Re: ACO-2020-082 Drones working with GA?

Dear [REDACTED]

Thank you very much for getting in touch. We submitted our proposal to the CAA on Friday 29th January 2021. However, please find the response to the points you raised below which will be forwarded to the CAA. All our engagement has been recorded and will be available on the portal [here](#) later in the week.

***The process you describe is.

1. application for airspace is made
2. Airspace users opinion sought
3. Applicant puts counter arguments to CAA
4. No further consultation takes place
5. Stake holders have no representation.
6. Airspace applicant has direct access to CAA
7. CAA decides on the above basis

Imposition of a Transponder Mandatory Zone imposes an unfair burden on other airspace users, there being no requirement to carry a transponder in class G airspace.

The TMZ phase of this project is planned for late September-December 2021 and will be a temporary airspace arrangement. The purpose of this trial is to reduce the need for TDAs going forwards and enable industry to be able to move towards a less restrictive airspace to enable UAS operations. We understand that a TMZ comes with aircraft equipage requirements, but this would be a progressive step forward over totally segregated operations, we hope you agree. We expect the carriage of CAP1391 approved devices will enable access to the Temporary TMZ not just Mode S transponders which again would be a step in the right direction. We hope that it being during the winter months will limit the impact on other airspace users and we will be investigating the options of a dynamic TMZ rather than H24.

***There is no requirement for the carriage of any radio equipment in a UK registered aircraft.

You will be denying airspace to many historically important aircraft.

Some of the best flying days can be in September and October. I for one fly throughout the year.

What Flight rules, according to the ANO, will you be operating to?

The CAA do not mandate the use of a TDA for commercial drone operations. Even worse is a mandatory TMZ which forces the equipping of a transponder which is not mandatory in the UK. Will you be pay for this?

Very few aircraft have ADSB.

I support commercial drone operation alongside general aviation but only if.

1. The drone operator takes responsibility for isolating the cargo they carry from the environment in which they operate.

For this project, the drones will not be carrying any cargo.

2. The drone operator has no impact on the environment it operates in.

As described above, the ambition of this project is to reduce the impact of UAS operations on other airspace users in the future. However, we understand that to enable a known traffic environment through the utilisation of Electronic Conspicuity does still carry a burden on airspace users.

***Why should any other airspace user have the burden of equipping their aircraft to facilitate drone operations? If the challenges of operating in integrated airspace are considered at an early stage segregated airspace will not be needed.

Commercial drone operations must be developed without relying on the establishment of TDAs and TMZs to remove an unacceptable burden on other airspace users.

To enable such operations requires regulations and rule which in turn, requires trials to collate the evidence. To safely carry out these trials, airspace does need to be segregated. This project aims to develop these operations safely and quickly to minimise the need for segregated airspace in the future.

*** from what you say,, no evidence is available to justify the use of segregated airspace and I see no work presented by UAS operators to show they have investigated other options with existing airspace e users.

***This matter has not been investigated in a satisfactory manner and the establishment of new airspace must be a last resort.

If you have any further questions, please do get in touch.

Kind Regards,

[Redacted Signature]

Mob: [Redacted]

Web: www.traxinternational.co.uk

