

[REDACTED]

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**From:** [REDACTED]  
**Sent:** 04 March 2021 11:14  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Request to Extend ACP-2020-055 within 90 Day Notification Period

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

[REDACTED]

Following on from my last email, your request has been discussed with and considered by relevant colleagues.

We note that you are requesting to extend your activities to the 2<sup>nd</sup> May, but that this will still be within the 90-day period allowed for a temporary airspace change (in this instance a Temporary Danger Area). We are also aware that you had previously stated that your activities would take place between the 8<sup>th</sup> February and the 31<sup>st</sup> March; these dates are published within your stakeholder engagement summary report and the TOI.

Having considered the details of your request, I can confirm that we accept your rationale for pursuing an extension to your TDA activities up the 2<sup>nd</sup> May. In terms of next steps, you will be required to contact all relevant stakeholders to:

- inform them of your intention to extend your TDA activities, confirming the relevant dates and the arrangements that will be in place during this time;
- explain to them why this extension is necessary – in doing so you should consider focussing on your continued efforts to support the NHS (highlighting what has been achieved to date and your intentions during the extension) up to the easing of the national lockdown restrictions in Scotland and the impact that weather conditions have had on your efforts to date;
- advise them that if there is anything of significance happening that is likely to have an impact on your intention to extend your TDA activities (i.e. has there been/will there be a change in their circumstances) to contact you directly, ensuring that you provide them with the relevant contact details. As detailed in the decision email, you are required to collate, monitor and report to the CAA on the level and content of stakeholder feedback during the course of the TDA. Please ensure that any comments received in relation to the extension of your activities are captured accordingly within your bi-weekly reports to the CAA. You may wish to note that the 'Complaints Criteria' section of CAP 1616 (see page 95 in [Version 4](#)) provides specific guidance on the criteria that a complaint received in relation to a temporary airspace change must meet for the CAA to begin an urgent investigation; and finally
- PDF and upload a suitably redacted copy of this email trail to the Airspace Change Portal.

Whilst I trust the above is clear, please do not hesitate to contact me should you feel it would be beneficial to discuss the matter further.

Kind Regards,

[REDACTED]

[REDACTED]  
Airspace Regulator (Engagement & Consultation)  
Airspace, ATM & Aerodromes  
Civil Aviation Authority



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Note that all documents should be sent to us electronically.

Please see our [guidance relating to COVID-19](#) for more information.

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**From:** [REDACTED]  
**Sent:** 03 March 2021 08:21  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Request to Extend ACP-2020-055 within 90 Day Notification Period

[REDACTED]

Thanks for the comprehensive and very informative email. I'll discuss this with my colleagues and will come back to you as soon as I possibly can.

Kind Regards,

[REDACTED]  
[REDACTED]  
Airspace Regulator (Engagement & Consultation)  
Airspace, ATM & Aerodromes  
Civil Aviation Authority



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**From:** [REDACTED]  
**Sent:** 03 March 2021 07:58  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** Request to Extend ACP-2020-055 within 90 Day Notification Period

[REDACTED]

I am writing as the sponsor for this change to seek an extension please to temporary change ACP-2020-055.

The change was approved on Friday 29 January 2021 and the 90-day notification period commenced on 8 February 2021.

The original period of operations, for which a Briefing Sheet originally and then an AIC was produced subsequently, was between 8 February 2021 and 31 March 2021.

We are seeking an extension please of just over 4 weeks consecutive to the original period of operations. The extension would therefore run from Friday 1 April 2021 until Sunday 2 May 2021 while keeping the whole ACP-2020-055 change within the 90 notification period. Scotland is expected to move out of nationwide restrictions and transition into Tiers by the last week in April. By the same time, the Scottish Government is expecting the Joint Committee on Vaccination and Immunisation (JCVI) top nine priority groups will have been vaccinated, finally easing pressure on the NHS from COVID-19.

The reasons for this request is as follows:

- The operation is being conducted in support of the NHS response to COVID 19.
- The operation so far has been a success in the following ways:
  - We have already saved the NHS over 2,500 hours (and increasing everyday) in COVID-19 and routine sample transportation time. This is 2,500 of total waiting time hours removed; time within which patients, for example, could start quarantining properly due to a COVID-19 test, continue with their lives if they received a negative test and get started on other life-saving treatments sooner;
  - We have achieved a <90% reduction in average time for a sample in transit; and
  - We have achieved an average time of 1.5 hours from the order being placed to delivery being made, showing a strong ability to respond to urgent requests such as unplanned COVID-19 tests.
- During the operations, however, there have been new revelations in the way that the drone delivery service is being used by NHS staff at these specific hospital and medical practice sites that neither the NHS nor Skyports were aware of when we established the period of operations.
- As a consequence, both the NHS and Skyports require more time to better understand the nature of this new demand but also to make sure that the service is then adapted so that it is meeting the demand to the greatest effect when the NHS needs it most. By way of examples:



- We are currently operating a route between the Mull & Iona Community Hospital (Craignure on the Isle of Mull) and the Lorn & Islands Hospital (Oban). The service was originally designed based on the analysis of demand at those two sites alone. Very recently, and as more NHS staff have heard about the drone service, other medical practices on the Isle of Mull are bringing their samples to the Mull & Iona Community Hospital so they can benefit by getting their samples transported by drone and analysed more quickly in Oban. This “drop off / air bridge” style logistics system was not scoped at the beginning of this project; however, local clinical staff have realised its potential and it could become a critical part of NHS Isle of Mull logistics. We need to provide the maximum benefit to the local NHS by lengthening the amount of time so we can develop the service to most closely meet their needs;
- COVID-19 vaccines were originally not in scope for this project with the focus being on COVID-19 pathology/testing. As the vaccine rollout has gained momentum and the drone delivery service is proving its value, the NHS has identified the potential need to transport the Astra Zeneca vaccine to medical facilities within this network. We are currently working with the local NHS pharmacists to execute on this and we wish to help transport vaccines while we have the chance to help. Without extending the period of operations, the full benefit of this vaccine carriage capability will not be realised to these facilities;
- The Ferry system between the Isle of Mull and mainland has experienced both planned and unplanned downtime. For example, next week (w/c 8 March 2021) the ferry will be non-operational for 2 days in a row due to maintenance that was not planned when we were planning the operation. The NHS has asked us to ensure that we can fly during these days. This ferry service interruption is now scheduled to occur more in the coming months, and the drone delivery service provides redundancy which is needed by the NHS during COVID-19 where pathology supply chain continuity is critical;
- Demand for “reverse logistics” at these sites has been stronger than originally envisaged by the NHS with important cargo being carried from hub to spoke, as opposed to performing pathology pickups from the spokes to travel back to hub. “Point of care” patient testing cartridges have emerged as a clear urgent, small, expensive item which are dispatched following a “just in time” methodology, making them perfect for drone delivery and something we would like more time to trial and analyse; and
- The amount of available up-time has been lower than we originally planned due to the weather conditions over the first month. The wind strength has been higher than normal for this time of year and fallen outside the limitations of the aircraft. Drone up-time has been around 30-40% worse and delivery frequency has been 37% less (because of the wind) than originally envisaged and planned for with the NHS; therefore, during drone down-time, we have not been able to realise the full benefits of delivery frequency between these sites that we would have expected during normal wind conditions. More time when the weather is expected to improve would enable us to provide a more reliable service – especially if we can use it to the full to help complete the vaccination of the JCVI top nine priority groups by the end of April.

Thank you in advance for considering the above. If you have any questions or require any clarification on any points, please let me know.

Finally, on a side note on some stakeholder engagement, despite national lockdown we’ve had some positive engagement with local airspace users and can share a few anecdotes for your information about airspace implementation. We hosted some local airspace stakeholders in COVID-19 secure way at our hub site, who have been impressed by the professionalism of our operations and who took away fresh perspective on our operation. We know of multiple local airspace stakeholders who are enjoying tracking our progress on Flightradar24. In addition, we had one stakeholder who has been opposed to our operation configure his aircraft with ADS-B functionality and in collaboration with us came and flew his aircraft in the vicinity (but outside) of our TDAs during a flight. This allowed us informally safety test the ADS-B device on our respective aircraft. This has been an incredibly constructive experience which we are experiencing a lot of every week. The value of this engagement cannot be

understated. We have also hosted Oban Airport and Oban Council in a COVID-19 secure way down at our Hub Site receiving very positive feedback and both marvelling about the future of local aviation and healthcare in Argyll & Bute. We'll be sure to share a full debrief with the CAA once the operation has concluded.

Thanks again and best wishes

[REDACTED]

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

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