Skyports Limited

Airspace Change – ACP-2020-099 – UAS BVLOS in Segregated Airspace (Oban-Mull-Coll)

Summary Report – Targeted Aviation Stakeholder Engagement [REDACTED]

Version 2.0 – Dated: 25 February 2021

Amendment record

Issue	Amendment	Date
v1.0	Initial Issue	10/02/21
V2.0	• Explanation provided on why some organisation stakeholders had not been identified on the original aviation stakeholder list (2.1) • Clarification provided on CAA role in review of the stakeholder engagement material (2.2) • Clarification provided on CAA role in sponsor's determination of revised change timescales (2.3) • Explanation provided throughout the section, detailing which types of stakeholders had raised particular concerns (5.) • Explanation provided why the application of a constrained leg cannot be applied to the rest of the proposed designs (5.4.2) • Clarification provided that the Final change proposals (6.) are the same as the Revised change proposals (4.) (6.) • Addition of a new sub-section explaining how Skyports will collate, monitor and report to the CAA on the CAA on the level and content of related complaints/feedback if and when the TDA is implemented (6.2) • Clarification provided on the number of organisation responses and the number of individual responses received. Clarification provided on: i) whether and how many stakeholders who supported the original and/or revised designs changed their mind; ii) whether and how many stakeholders who opposed the original and/or revised designs changed their mind. Clarification also provided on the stakeholders who were not included in the original email outreach. Clarification also included that the colour-coding does not represent stakeholder support or opposition, only whether Skyports had issued emails and whether responses by stakeholders had been received (7.2)	25/02/21

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 For reference, a copy of this version and all superseded versions will be stored on a secure server.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 (redacted) 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
DA/TDA Policy 20200721	CAA Policy for the Establishment of Permanent and Temporary Danger Areas	Version 1.0 21 July 2020	DA/TDA Policy 20200721
CAP 1616	Airspace Change – Guidance on the regulatory process for changing the	Version 3.0 22 January 2020	CAP 1616

	notified airspace design and planning and planned and permanent redistribution of air traffic, and on providing airspace information		
CAP1827	Beyond Visual Line of Sight (BVLOS) operations of unmanned aircraft systems (UAS) in unsegregated airspace: Sandbox brief	Version 1.0 1 August 2019	CAP 1827
CAP1915	Unmanned Aircraft Systems: BVLOS Operations in Support of the COVID-19 Response – Requirements, Guidance & Policy	Version 1.0 1 May 2020	CAP1915

Acronyms and abbreviations

ACP	Airspace Change Proposal
ADS-B	Automatic Dependent Surveillance-Broadcast
AGL	Above Ground Level
AFISO	Aerodrome Flight Information Service Officer
AIC	Aeronautical Information Circular
AMSL	Above Mean Sea Level
BVLOS	Beyond Visual Line of Sight
CAA	Civil Aviation Authority
CAP	Civil Aviation Publication
CTR	Controlled Traffic Region
DA	Danger Area
DAA	Detect and Avoid
DAAIS	Danger Area Activity Information Service
DACS	Danger Area Crossing Service
ESA	European Space Agency
EC	Electronic Conspicuity
FIS	Flight Information Service
Freq	Frequency
GA	General Aviation
HESLO	Helicopter External Sling Load Operation
HLS	Helicopter Landing Site
NHS	National Health Service
MOD	Ministry of Defence
NATMAC	National Air Traffic Management Advisory Committee
NATO	North Atlantic Treaty Organisation
NLB	Northern Lighthouse Board
NOTAM	Notice to Airman
LAT	Latitude
LONG	Longitude
LTD	Limited
POC	Proof of Concept
RA(T)	Restricted Area (Temporary)
RAF	Royal Air Force
RN	Royal Navy
RSPB	Royal Society for the Protection of Birds
SAMS	Scottish Association of Marine Sciences
SFC	Surface

SIL	Source Integrity Level
SUA	Small Unmanned Aircraft
TDA	Temporary Danger Area
TOI	Temporary Operating Instruction
UA	Unmanned Aircraft
UAS	Unmanned Aircraft System
UKSA	United Kingdom Space Agency
UTM	Unmanned Traffic Management
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 routeing 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

1 Introduction

Skyports (the change sponsor) is seeking a Temporary Danger Area (TDA) complex to be established during notified periods to enable the safe UAS BVLOS operations during a trial operation for 4 weeks commencing on 8 April 2021 to transport medical equipment, medical samples (including dangerous goods) and medicine by small unmanned aircraft (SUA) to and from multiple healthcare facilities in Argyll & Bute on the west coast of Scotland. Specifically, Skyports will be transporting COVID-19 testing kits and COVID-19 testing samples for analysis.

The operation is a response to a written request from the National Health Service (NHS) in Scotland for assistance with the response to COVID-19. The project is part funded by Skyports and through a joint initiative by the European and UK Space Agencies for the utilisation of space-enabled technology to assist with the COVID-19 response. The NHS is not making any payment for these services.

The CAA Policy for the Establishment of Permanent and Temporary Danger Areas – 20200721 (a scaled down version of CAP1616) includes a statutory obligation to engage aviation stakeholders and other relevant stakeholders, and give due consideration to the potential positive and negative impacts of the change on the airspace users.

Following an Assessment Meeting with CAA Airspace Regulation on 16 December to discuss Skyports Statement of Need, it was agreed that to facilitate its operations a TDA would be required, the proposals for which would be subject to a targeted aviation stakeholder engagement exercise in accordance with the CAA Policy for the Establishment of Permanent and Temporary Danger Areas.

This document provides a summary of Skyports targeted aviation stakeholder engagement exercise that Skyports completed between 11 January 2021 and 31st January 2021 to allow aviation stakeholders to comment on Skyports TDA design and operational proposals. Additional engagement with some stakeholders continued beyond the deadline when requested.

2 Methodology

2.1 Stakeholder identification

Skyports engaged aviation stakeholders considered to be directly affected and potentially impacted as well as those that would likely have an interest in the ACP. In particular, Skyports referred to the National Air Traffic Management Advisory Committee to assist with the identification of relevant stakeholders. See 7 Stakeholders.

During the engagement process 20 additional organisation stakeholders were brought to Skyports' attention through aviation stakeholders with whom we had been in contact. Skyports subsequently shared the latest engagement material with these organisation stakeholders, with the offer of additional time to respond if requested. These organisation stakeholders have been identified in Section 7. Stakeholders for specific organisations. Adopting a similar approach to the determination of stakeholders within this area, Skyports included representative organisations in a position to share engagement material with organisations and individuals within their membership. New stakeholders that are now known to us by name would be contacted directly from the outset during any future ACPs should they be required.

2.2 Engagement material

Skyports shared the engagement material containing details and a map of the proposed TDAs, together with details of how the TDAs will be operated.

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

Skyports shared the engagement material with CAA Airspace Regulation for guidance before distribution to stakeholders.

2.3. Communications

Skyports shared engagement material with stakeholders via email, which was completed on 11 January 2021, consistent with the original Timeline Agreement Skyports made with CAA Airspace Regulation.

To encourage a good level of engagement with the process from stakeholders and based on stakeholder feedback, Skyports revised its original timeline agreement extending the engagement period by a week to 31st January 2021. The extension email was distributed on 20th January 2021. Skyports informed CAA Airspace Regulation of the plans to extend the engagement period and to inform them that such an extension would not adversely affected any other deadlines within the change process, namely the dates for the proposed submission and for the CAA's decision.

Stakeholder engagement material Version 2 and reminder was sent out 22nd January 2021, with a final reminder and Version 3 send out 28th January 2021. Skyports continued to accept submissions of feedback up to 4th February 2021 for those who could not meet the revised 31st January timeline.

2.4 Feedback

Where stakeholders asked that we share their feedback in full with the CAA, Skyports has done this in this document and will share this information at the Step 3d Collate & Review Responses stage of the ACP.

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

Where stakeholders requested that Skyports keeps them up-to-date with progress of the airspace change and the final designs agreed with the CAA, Skyports will do this at the soonest opportunity within the airspace change process.

We have reviewed all submissions and any associated emails we have received and summarised them qualitatively. There were a number of commons themes; therefore, we have categorised stakeholder views and the Skyports response to those views, including solutions, in section 5. Summary of stakeholder feedback. The issues identified have not been placed in any order of importance or priority and we give equal weight to all concerns, suggestions and recommendations.

3 Original change proposals

3.1 TDA complex

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

Thirteen adjacent TDAs are required to facilitate our operations and are designed to minimise the impact on other aviation stakeholders in the area.

3.1.1 Aringour

Identification and Lateral Limits	**Upper Limit** **Lower Limit**	**Remarks**

	Area bounded by straight lines joining		Lower Limit: SFC Upper Limit: 400ft AMSL	Activity: UAS Beyond Visual Line of Sight (BVLOS) Hours: When notified Sponsor: Skyports
WP	**LON**	**LAT**		
1	-6.12995	56.65058		
2	-6.54176	56.59795		
3	-6.56259	56.62822		
4	-6.51564	56.63697		
5	-6.50772	56.62343		
6	-6.11787	56.67179		
7	-6.03109	56.64245		
8	-6.06870	56.63078		

3.1.2 Tobermory Bay

Identification and Lateral Limits			**Upper Limit** **Lower Limit**	**Remarks**
	Area bounded by straight lines joining		Lower Limit: SFC Upper Limit: 550ft AMSL	Activity: UAS Beyond Visual Line of Sight (BVLOS) Hours: When notified Sponsor: Skyports
WP	**LON**	**LAT**		
1	-6.06870	56.63078		
2	-6.03109	56.64245		
3	-5.99982	56.61413		
4	-6.03631	56.60310		

3.1.3 Tobermory

Identification and Lateral Limits			**Upper Limit** **Lower Limit**	**Remarks**
	Area bounded by straight lines joining		Lower Limit: SFC Upper Limit: 600ft AMSL	Activity: UAS Beyond Visual Line of Sight (BVLOS) Hours: When notified Sponsor: Skyports
WP	**LON**	**LAT**		
1	-6.10764	56.61939		
2	-6.06872	56.63078		
3	-6.03625	56.60305		
4	-6.08424	56.59374		

3.1.4 Tobermory - Craignure

Identification and Lateral Limits			**Upper Limit** **Lower Limit**	**Remarks**
	Area bounded by straight lines joining		Lower Limit: SFC	
WP	**LON**	**LAT**		

1	-5.80056	56.50618	Upper Limit: 450ft AMSL	Activity: UAS Beyond Visual Line of Sight (BVLOS) Hours: When notified Sponsor: Skyports
2	-5.96513	56.53995		
3	-6.03639	56.60310		
4	-5.99996	56.61407		
5	-5.92867	56.55393		
6	-5.78104	56.52525		
7	-5.72237	56.49755		
8	-5.74943	56.48060		

3.1.5 Craignure

Identification and Lateral Limits			**Upper Limit** **Lower Limit**	**Remarks**
	Area bounded by straight lines joining		Lower Limit: SFC Upper Limit: 450ft AMSL	Activity: UAS Beyond Visual Line of Sight (BVLOS) Hours: When notified Sponsor: Skyports
WP	**LON**	**LAT**		
1	-5.74941	56.48061		
2	-5.71625	56.50134		
3	-5.68134	56.48738		
4	-5.71391	56.46573		

3.1.6 Craignure – Oban

Identification and Lateral Limits			**Upper Limit** **Lower Limit**	**Remarks**
	Area bounded by straight lines joining		Lower Limit: SFC Upper Limit: 400ft AMSL	Activity: UAS Beyond Visual Line of Sight (BVLOS) Hours: When notified Sponsor: Skyports
WP	**LON**	**LAT**		
1	-5.70710	56.47030		
2	-5.68135	56.48738		
3	-5.55191	56.43264		
4	-5.57955	56.41542		

3.1.7 Kerrera

Identification and Lateral Limits			**Upper Limit** **Lower Limit**	**Remarks**
	Area bounded by straight lines joining		Lower Limit: SFC Upper Limit: 700ft AMSL	Activity: UAS Beyond Visual Line of Sight (BVLOS)
WP	**LON**	**LAT**		
1	-5.57950	56.41548		
2	-5.55182	56.43264		

3	-5.48892	56.40592		Hours: When notified Sponsor: Skyports
4	-5.52711	56.39323		

3.1.8 Oban

Identification and Lateral Limits			**Upper Limit** **Lower Limit**	**Remarks**
	Area bounded by straight lines joining		Lower Limit: SFC Upper Limit: 950ft AMSL	Activity: UAS Beyond Visual Line of Sight (BVLOS) Hours: When notified Sponsor: Skyports
WP	**LON**	**LAT**		
1	-5.46893	56.41233		
2	-5.43918	56.39400		
3	-5.44500	56.37569		
4	-5.50220	56.37017		
5	-5.52704	56.39325		

3.1.9 Oban – Bunessan Sea 1

Identification and Lateral Limits			**Upper Limit** **Lower Limit**	**Remarks**
	Area bounded by straight lines joining		Lower Limit: SFC Upper Limit: 900ft AMSL	Activity: UAS Beyond Visual Line of Sight (BVLOS) Hours: When notified Sponsor: Skyports
WP	**LON**	**LAT**		
1	-5.50221	56.37018		
2	-5.54583	56.35648		
3	-5.56454	56.38161		
4	-5.52704	56.39325		

3.1.10 Oban – Bunessan Sea 2

Identification and Lateral Limits			**Upper Limit** **Lower Limit**	**Remarks**
	Area bounded by straight lines joining		Lower Limit: SFC Upper Limit: 400ft AMSL	Activity: UAS Beyond Visual Line of Sight (BVLOS) Hours: When notified Sponsor: Skyports
WP	**LON**	**LAT**		
1	-5.54586	56.35650		
2	-5.83215	56.28463		
3	-6.16890	56.27076		
4	-6.15191	56.29765		
5	-5.84348	56.31104		
6	-5.56454	56.38159		

3.1.11 Bunessan

Identification and Lateral Limits	**Upper Limit** **Lower Limit**	**Remarks**

	Area bounded by straight lines joining		Lower Limit: SFC Upper Limit: 450ft AMSL	Activity: UAS Beyond Visual Line of Sight (BVLOS) Hours: When notified Sponsor: Skyports
WP	**LON**	**LAT**		
1	-6.25494	56.33057		
2	-6.20793	56.33338		
3	-6.15193	56.29770		
4	-6.16889	56.27074		
5	-6.25636	56.30893		

3.1.12 Oban – Easdale

Identification and Lateral Limits			**Upper Limit** **Lower Limit**	**Remarks**
	Area bounded by straight lines joining		Lower Limit: SFC Upper Limit: 700ft AMSL	Activity: UAS Beyond Visual Line of Sight (BVLOS) Hours: When notified Sponsor: Skyports
WP	**LON**	**LAT**		
1	-5.49002	56.34116		
2	-5.53853	56.34894		
3	-5.50218	56.37018		
4	-5.44493	56.37573		

3.1.13 Easdale

Identification and Lateral Limits			**Upper Limit** **Lower Limit**	**Remarks**
	Area bounded by straight lines joining		Lower Limit: SFC Upper Limit: 950ft AMSL	Activity: UAS Beyond Visual Line of Sight (BVLOS) Hours: When notified Sponsor: Skyports
WP	**LON**	**LAT**		
1	-5.49001	56.34115		
2	-5.51924	56.31536		
3	-5.57459	56.28493		
4	-5.60663	56.28148		
5	-5.62667	56.28866		
6	-5.62797	56.30699		
7	-5.57902	56.32411		
8	-5.53858	56.34895		

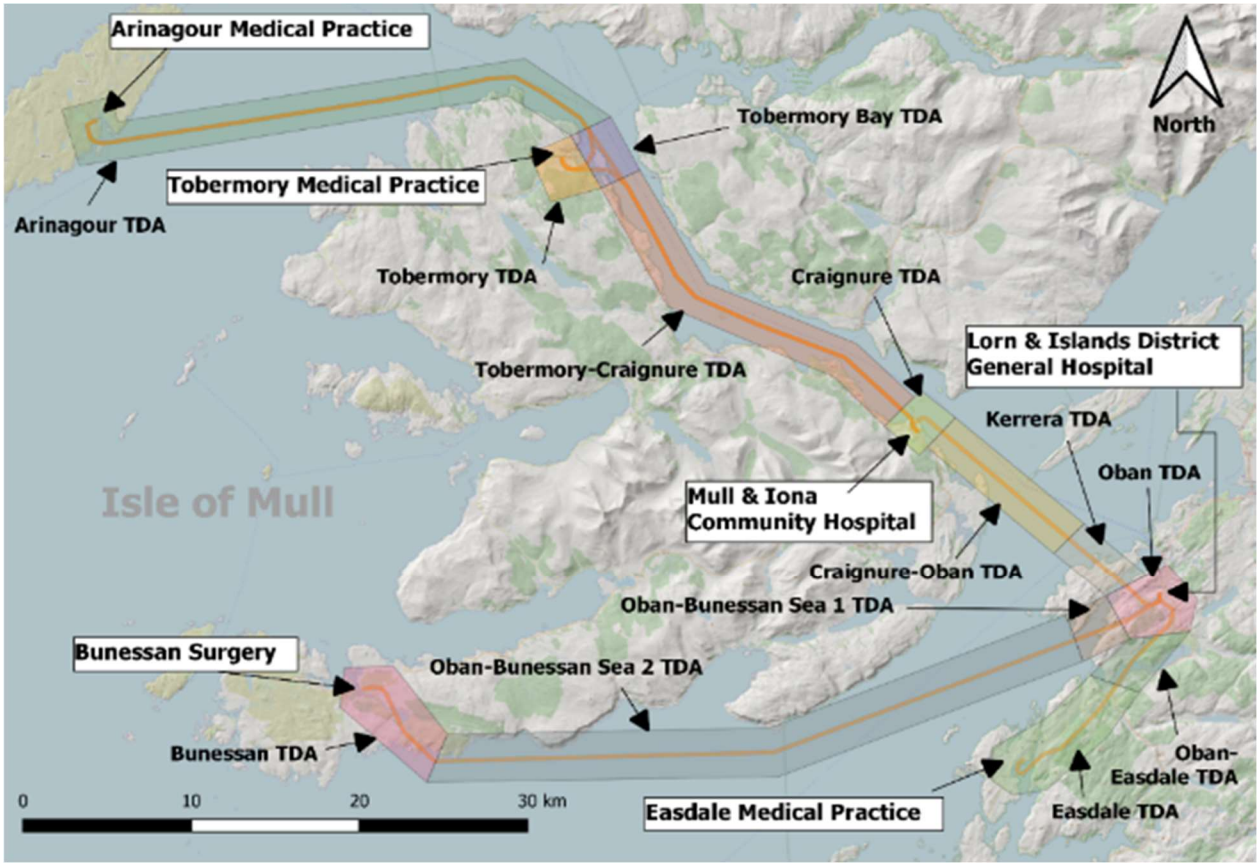

FIGURE 1: TOP DOWN VIEW OF ORIGINAL PROPOSED AIRSPACE DESIGN

3.2 Notification

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

3.3 TDA activation

Date	Time
Thursday 8 April 2021 to Friday 7 May 2021	Daylight hours and outside of daylight hours (including Saturdays and Sundays)

4 Revised change proposals

During the targeted aviation stakeholder engagement exercise, Skyports revised its change proposals based on feedback received by 22 January 2021.

A summary of all feedback received by the close of the engagement window, and Skyports response to feedback, is provided in section 5. Summary of feedback, which includes the rationale for revisions to the original change proposals as well as the rationale for the final change proposals; therefore, Skyports provides in this section a description of the revised proposals by way of explanation:

(i) Reroute and redesign of the Tobermory-Craignure TDA away from Glenforsa Airfield;

(ii) Removal of the Oban-Easdale TDA and the Easdale TDA;

(iii) Amendments to the Upper Limits of some of the individuals TDAs:

TDA Name	Original Upper Limit	Revised Upper Limit
Tobermory	600ft AMSL	550ft AMSL
Tobermory to Craignure	450ft AMSL	400ft AMSL

Craignure	450ft AMSL	400ft AMSL
Kerrera	700ft AMSL	600ft AMSL
Oban	950ft AMSL	750ft AMSL
Oban-Bunessan Sea 1	900ft AMSL	750ft AMSL
Bunessan	450ft AMSL	400ft AMSL

(iv) Amendment to the dates of activation to Thursday 8 April 2021 to Friday 30 April 2021; and

(v) Amendment of the time of activation by removing the intention to operate on Saturdays and Sundays, as well as Bank Holidays.

4.1 TDA complex

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

Eleven adjacent TDAs are required to facilitate our operations and are designed to minimise the impact on other aviation stakeholders in the area.

4.1.1 Arinagour

Identification and Lateral Limits			**Upper Limit** **Lower Limit**	**Remarks**
	Area bounded by straight lines joining		Lower Limit: SFC Upper Limit: 400ft AMSL	Activity: UAS Beyond Visual Line of Sight (BVLOS) Hours: When notified Sponsor: Skyports
WP	**LON**	**LAT**		
1	-6.12995	56.65058		
2	-6.54176	56.59795		
3	-6.56259	56.62822		
4	-6.51564	56.63697		
5	-6.50772	56.62343		
6	-6.11787	56.67179		
7	-6.03843	56.64018		
8	-6.06870	56.63078		

4.1.2 Tobermory Bay

Identification and Lateral Limits			**Upper Limit** **Lower Limit**	**Remarks**
	Area bounded by straight lines joining		Lower Limit: SFC Upper Limit: 550ft AMSL	Activity: UAS Beyond Visual Line of Sight (BVLOS) Hours: When notified Sponsor: Skyports
WP	**LON**	**LAT**		
1	-6.06870	56.63078		
2	-6.03844	56.64019		
3	-6.00609	56.61224		
4	-6.03631	56.60310		

4.1.3 Tobermory

Identification and Lateral Limits			**Upper Limit** **Lower Limit**	**Remarks**
	Area bounded by straight lines joining		Lower Limit: SFC Upper Limit: 600ft AMSL	Activity: UAS Beyond Visual Line of Sight (BVLOS) Hours: When notified Sponsor: Skyports
WP	**LON**	**LAT**		
1	-6.10764	56.61939		
2	-6.06872	56.63078		
3	-6.03625	56.60305		
4	-6.08424	56.59374		

4.1.4 Tobermory - Craignure

Identification and Lateral Limits			**Upper Limit** **Lower Limit**	**Remarks**
	Area bounded by straight lines joining		Lower Limit: SFC Upper Limit: 400ft AMSL	Activity: UAS Beyond Visual Line of Sight (BVLOS) Hours: When notified Sponsor: Skyports
WP	**LON**	**LAT**		
1	-5.74101	56.48589		
2	-5.79202	56.52109		
3	-5.80669	56.52394		
4	-5.80372	56.52914		
5	-5.96053	56.55664		
6	-5.96336	56.55290		
7	-5.98155	56.55663		
8	-5.99695	56.57754		
9	-6.03087	56.60483		
10	-6.00608	56.61224		
11	-5.97551	56.58570		
12	-5.96251	56.56751		
13	-5.95561	56.56598		
14	-5.95873	56.56035		
15	-5.81379	56.53409		
16	-5.80218	56.53192		
17	-5.79923	56.53688		
18	-5.77800	56.53279		
19	-5.72436	56.49621		

4.1.5 Craignure

Identification and Lateral Limits			**Upper Limit** **Lower Limit**	**Remarks**
	Area bounded by straight lines joining		Lower Limit: SFC Upper Limit: 400ft AMSL	Activity: UAS Beyond Visual Line of Sight (BVLOS) Hours: When notified Sponsor: Skyports
WP	**LON**	**LAT**		
1	-5.74941	56.48061		
2	-5.71625	56.50134		
3	-5.68134	56.48738		
4	-5.71391	56.46573		

4.1.6 Craignure – Oban

Identification and Lateral Limits			**Upper Limit** **Lower Limit**	**Remarks**
	Area bounded by straight lines joining		Lower Limit: SFC Upper Limit: 400ft AMSL	Activity: UAS Beyond Visual Line of Sight (BVLOS) Hours: When notified Sponsor: Skyports
WP	**LON**	**LAT**		
1	-5.70710	56.47030		
2	-5.68135	56.48738		
3	-5.55191	56.43264		
4	-5.57955	56.41542		

4.1.7 Kerrera

Identification and Lateral Limits			**Upper Limit** **Lower Limit**	**Remarks**
	Area bounded by straight lines joining		Lower Limit: SFC Upper Limit: 600ft AMSL	Activity: UAS Beyond Visual Line of Sight (BVLOS) Hours: When notified Sponsor: Skyports
WP	**LON**	**LAT**		
1	-5.57950	56.41548		
2	-5.55182	56.43264		
3	-5.48892	56.40592		
4	-5.52711	56.39323		

4.1.8 Oban

Identification and Lateral Limits		**Upper Limit** **Lower Limit**	**Remarks**
	Area bounded by straight lines joining	Lower Limit: SFC	

WP	LON	LAT	Upper Limit: 750ft AMSL	
1	-5.46893	56.41233		Activity: UAS Beyond Visual Line of Sight (BVLOS)
2	-5.43918	56.39400		
3	-5.44500	56.37569		Hours: When notified
4	-5.50220	56.37017		Sponsor: Skyports
5	-5.52704	56.39325		

4.1.9 Oban – Bunessan Sea 1

Identification and Lateral Limits			**Upper Limit** **Lower Limit**	**Remarks**
	Area bounded by straight lines joining		Lower Limit: SFC Upper Limit: 750ft AMSL	Activity: UAS Beyond Visual Line of Sight (BVLOS) Hours: When notified Sponsor: Skyports
WP	**LON**	**LAT**		
1	-5.50221	56.37018		
2	-5.54583	56.35648		
3	-5.56454	56.38161		
4	-5.52704	56.39325		

4.1.10 Oban – Bunessan Sea 2

Identification and Lateral Limits			**Upper Limit** **Lower Limit**	**Remarks**
	Area bounded by straight lines joining		Lower Limit: SFC Upper Limit: 400ft AMSL	Activity: UAS Beyond Visual Line of Sight (BVLOS) Hours: When notified Sponsor: Skyports
WP	**LON**	**LAT**		
1	-5.54586	56.35650		
2	-5.83215	56.28463		
3	-6.16890	56.27076		
4	-6.15191	56.29765		
5	-5.84348	56.31104		
6	-5.56454	56.38159		

4.1.11 Bunessan

Identification and Lateral Limits		**Upper Limit** **Lower Limit**	**Remarks**
	Area bounded by straight lines joining	Lower Limit: SFC	

WP	LON	LAT	Upper Limit: 450ft AMSL	
1	-6.25494	56.33057		Activity: UAS Beyond Visual Line of Sight (BVLOS)
2	-6.20793	56.33338		
3	-6.15193	56.29770		Hours: When notified
4	-6.16889	56.27074		Sponsor: Skyports
5	-6.25636	56.30893		

4.2 Top-down review

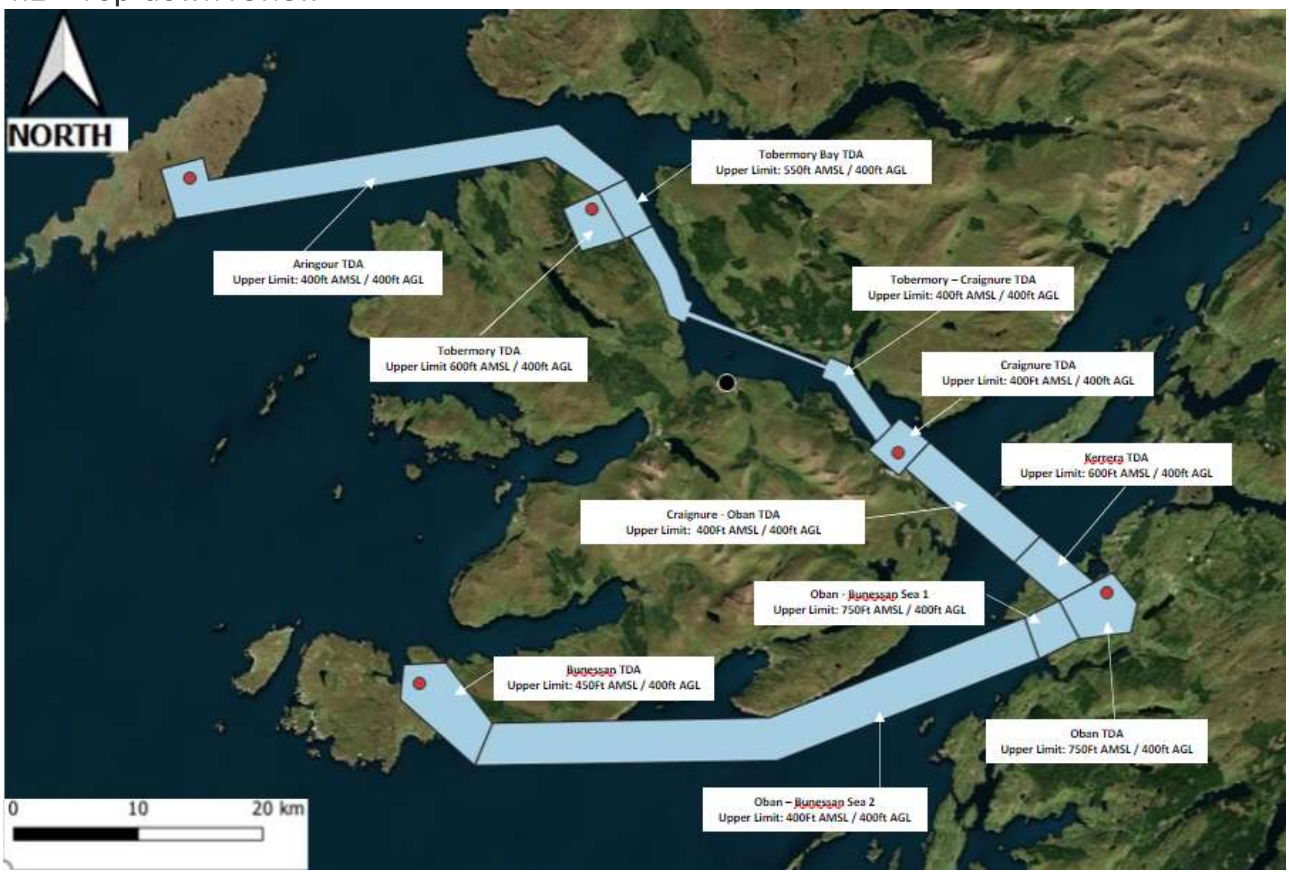

FIGURE 2: TOP DOWN VIEW OF REVISED PROPOSED AIRSPACE DESIGN

4.3 Notification

Skyports will promulgate TDA activations by NOTAM at least 24 hours before the day of planned use.

4.4 TDA activation

Date	Time
Thursday 8 April 2021 to Friday 30 April 2021	Daylight hours and outside of daylight hours (**excluding** Saturdays, Sundays and Bank Holidays)

5 Summary of stakeholder feedback

5.1 General

Of the initial stakeholders who supported or expressed no opposition to the proposal, none subsequently changed their minds throughout the engagement process. Of those who initially had concerns or objected to the proposal, 6 stakeholders (all from the GA community) changed their mind, given either further

clarification on the operation or based on the revisions contained within version 2 and/or version3 of the proposals. The 1500ft cloud base limitation (contained within v3) was generally the most well received revision.

Those who had concerns relating to the ACP process or proposed designs were mainly from the GA community. These stakeholders were all engaged with on an individual basis in an attempt to address specific concerns.

See 7.2 Aviation stakeholders for more information.

5.2 Safety

5.2.1 Summary of stakeholder responses

The area is popular with local flying clubs and aircraft travelling from further field. While light aircraft use the area regularly mostly at higher altitudes, both light and commercial aircraft will use the proposed routes for low level transits when the weather is poor with lowering cloud and reduced visibility, often needing to fly below 500ft. Transits between Glenforsa and Oban are generally carried out at lower levels through the Sound of Mull and along the Fifth of Lorn due to variable, localised weather including strong head winds and wind-shear effects from the hills. Individual stakeholders, flying clubs and organisations representing the GA community raised concerns about the increased workload on pilots operating in this challenging location due to already existing terrain and local weather phenomenon, and having confidence to be able to fly safely.

5.2.2 Sponsor response and mitigations

Skyports has committed to not operating whenever the cloud base is below 1500ft AMSL, which received support from a number of stakeholders, and unless visibility is equal to or greater than 1500m. This will ensure the airspace is clear and will minimise impacts on pilot workload when the conditions are poor and challenging to navigate. Skyports will use Met Office Aviation Briefing Services and other applications for tactical decisions to determine the cloud base before commencing and throughout operations.

The SUA itself also has strict weather limitations, which have been reviewed by the CAA UAS Team. Skyports will not operate outside the weather limitations of the vehicle:

Max. wind	27 kts (14 m/s) from any direction
Min. visibility	Min. 1500m. Flights will comply with visual meteorological conditions (VMC).
Precipitation	Moderate rainfall (2mm – 10mm per hour)
Cloud ceiling	1500ft AMSL
Min. / Max. Operating Temperature	0°C / +45°C

If the UAS is not able to operate due to conditions exceeding the cloud base and/or minimum visibility conditions, or the limitations of the vehicle, Skyports will i) not activate the TDA(s) during the affected period the; or ii) will deactivate the active TDA(s) for the remaining period. See 5.3 Activation.

5.3 Airspace designs

5.3.1 Summary of stakeholder responses

Individuals, some flying clubs and organisations representing the GA community thought the proposed designs are overly complicated horizontally and vertically which can make avoidance challenging for light aircraft operating by visual flight rules (VFR) and increases the chances of infringement. The dimensions of the proposed TDAs should be the minimum size – horizontally and vertically – practicably necessary to meet the task. Some individual stakeholders from within the GA community helpfully suggested rerouting south of the Island of Mull to avoid conflict with GA traffic as they would generally be flying higher around south of the island.

5.3.2 Sponsor response and mitigations

Skyports is only seeking the volume of airspace required to accommodate safe UAS BVLOS operations. Further simplification of the airspace designs into a single volume would have the effect of taking more airspace that is necessary. The revised designs make as much as possible airspace available to other airspace users even when TDAs are active and still accommodate safe UAS BVLOS operations.

Any airspace segregation used should encompass the entire Operational Volume and Emergency Buffer, within which BVLOS flight takes place.

According to CAP1915, the Flight Volume should encompass the entire flight, which sufficient buffer for any operational movement around the flight path due to navigational errors, expected weather conditions and any other reason for deviating from the flight path. The Contingency Volume provides a buffer around the Flight Volume.

If the aircraft leaves the Flight Volume and enters the Contingency Volume, then the contingency procedures, provided in the Operating Safety Case (OSC) for approval by the CAA UAS Team, will be activated. The exact procedures will depend on the nature of the operation but will result in the aircraft re-entering the Flight Volume. The Contingency Volume should be sufficiently large to accommodate any excursion, with enough room to manoeuvre the aircraft back into the Flight Volume. The Flight Volume and the Contingency Volume make up the Operational Volume.

Should the contingency mitigations fail, the aircraft may leave the Operational Volume and enter the Emergency Buffer. Upon such excursion, the emergency procedures and Emergency Response Plan, detailed within the OSC, will be executed. The Operational Volume and Emergency Buffer within which BVLOS flight takes place must all be within segregated airspace.

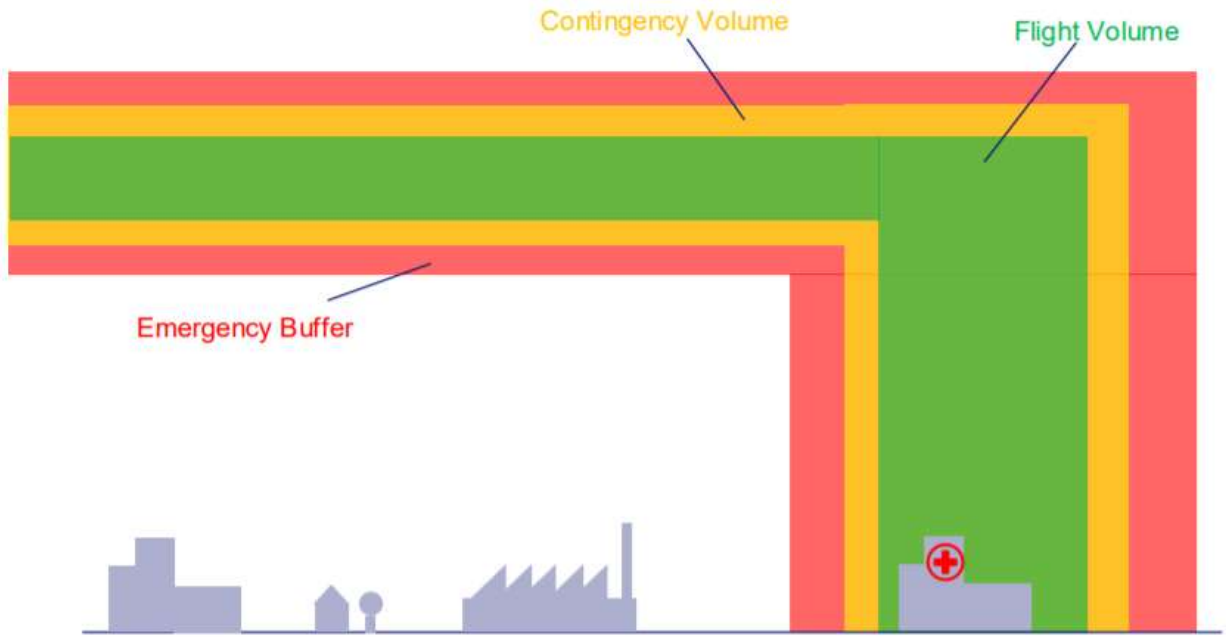

FIGURE 3: FLIGHT VOLUME, CONTINGENCY VOLUME AND EMERGENCY BUFFER

Skyports will not activate the whole TDA complex concurrently. Only two routes will be flown concurrently and unused TDAs will remain inactive. The presentation of the whole complex is to show what segregated airspace is required to facilitate operations throughout the proposed period, not what separate configurations will be represented when only parts of the complex are activated. The TDAs will be activated with 24 hours' notice and will only be active on days or parts of days where operations within

that TDA are taking place. We do not expect all TDAs to be active each day, only those where routes will be flown. Skyports provided examples of TDA combinations in v2.0 of the engagement material. As follows:

Route Combinations

(a) Oban to/from Bunessan with Craignure Route Combination:

- Unused TDAs linking Craignure to Coll will remain inactive

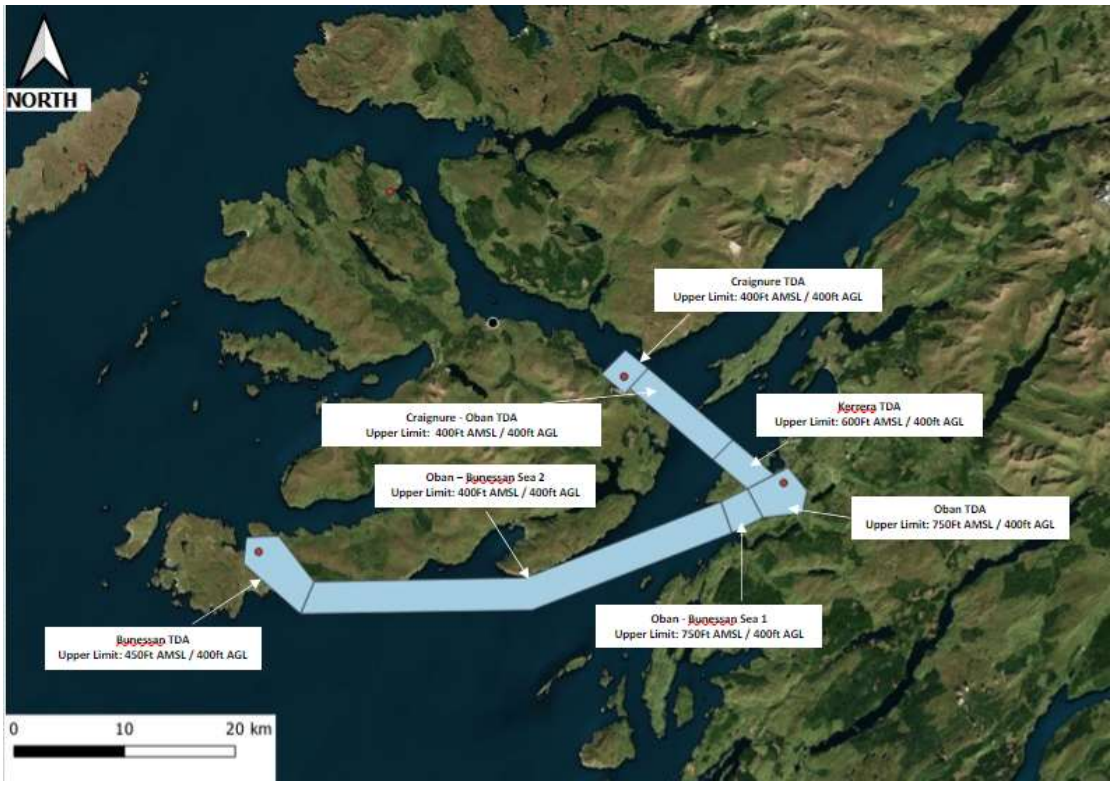

FIGURE 4: OBAN TO/FROM BUNESSAN WITH CRAIGNURE ROUTE COMBINATION

(b) Oban to/from Tobermory Route Combination:

- Unused TDAs linking Coll to Tobermory and Oban to Bunessan will remain inactive.

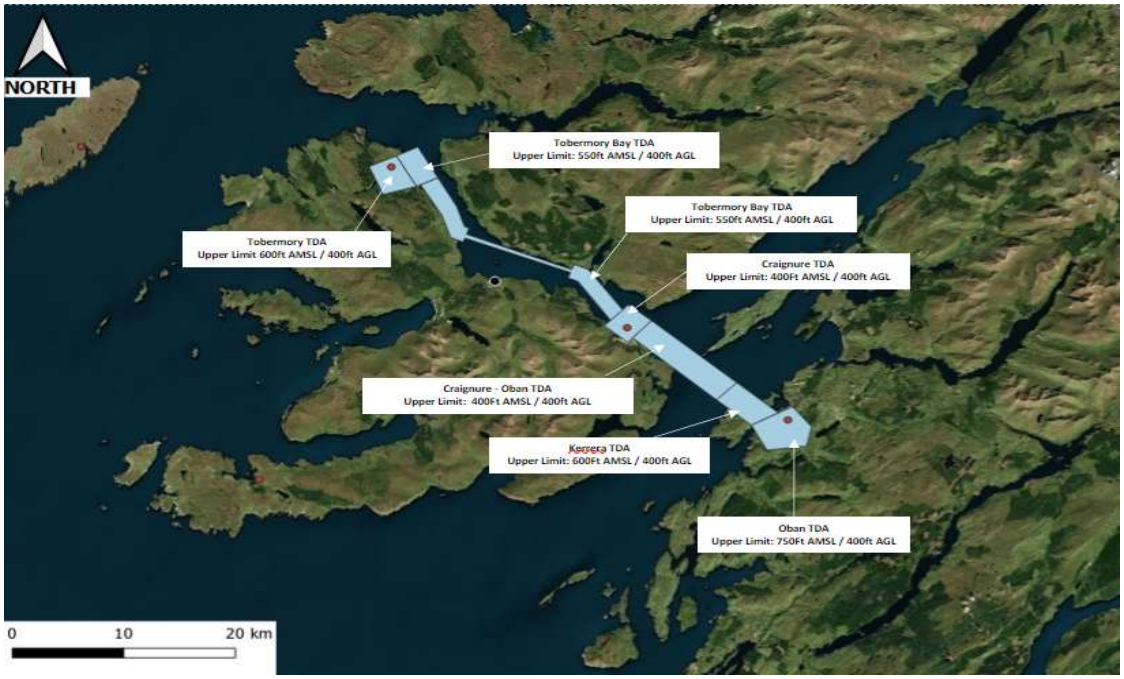

FIGURE 5: OBAN TO/FROM TOBERMORY ROUTE COMBINATION

(c) Oban to/from Craignure Route Combination:

- Unused TDAs linking Craignure to Coll and Oban to Bunessan will remain inactive.
- Oban to/from Craignure links the only two 24hr hospitals.

FIGURE 6: OBAN TO/FROM CRAIGNURE ROUTE COMBINATION

(d) Oban to/from Coll Route Combination:

- Unused TDAs linking Oban to Bunessan will be deactivated/remain inactivated.

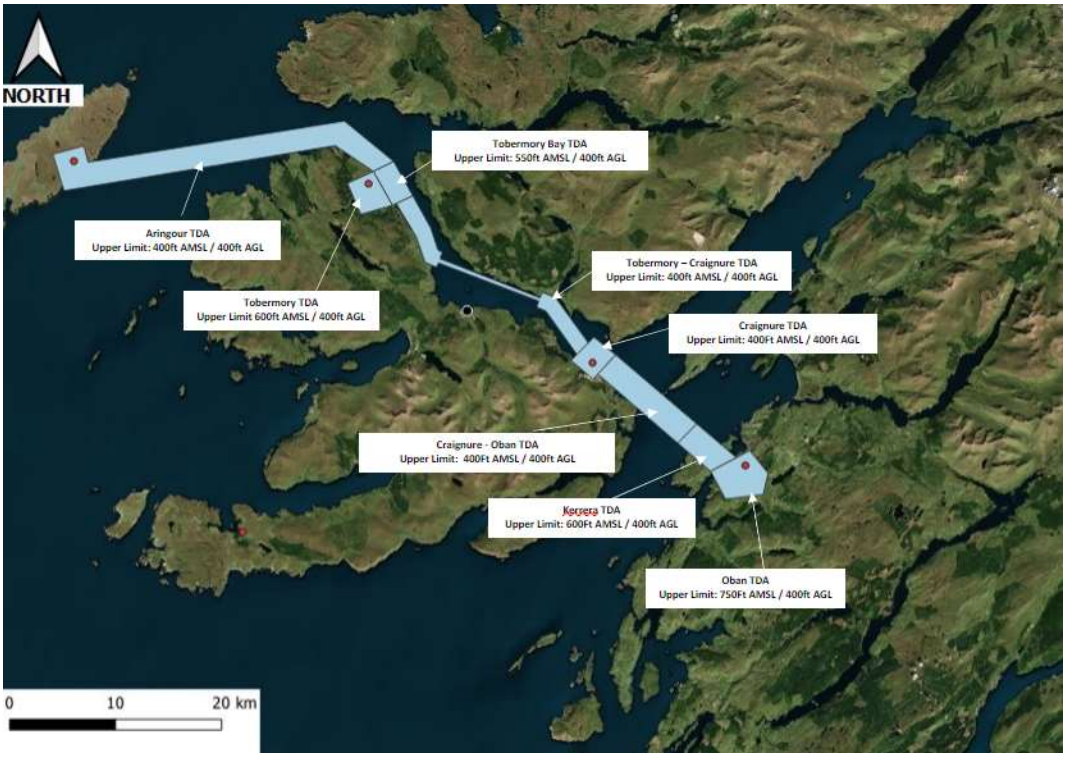

FIGURE 7: OBAN TO/FROM COLL ROUTE COMBINATION

Upper Limits

Skyports endeavoured to keep the maximum altitudes of the proposed TDAs to 400ft AMSL wherever possible. This was possible over water, but not possible with elevated terrain as the routes came in land; the SUA is required to climb overt the terrain to reach its final destination.

We had made clear that the upper limits were depicted in AMSL, and not AGL, which created some confusion. The SUA would not exceed 400ft AGL throughout operations (the maximum operating limit for UAS operated within VLOS and the Open Category; indeed, the SUA would be flown lower over sea and land. The SUA cannot be operated below 200ft AMSL over the sea due to saltwater spray and the potential erosion this would have on the SUA motors, but we will operate around 380 AGL.

Nevertheless, Skyports has looked at all the TDAs in excess of 400ft AMSL and, through some rerouting, have reduced the limits were practicable. See 4. Revised change proposals.

Oban Airport

Some stakeholders understood Skyports would either be using Oban Airport or blocking access to Oban Airport, which is a vital diversion airport and as a refuelling station; however, Skyports will be based at the Lorn & Islands Hospital in Oban, located outside the Oban FRZ. Access to Oban Airport will be unrestricted.

South of the Island Rerouting

Unfortunately, Skyports cannot reroute to the south of the Island of Mull as the distance between TOLPs exceed the maximum range of the SUA.

5.4 Access to Glenforsa Airfield

5.4.1 Summary of stakeholder responses

One of the TDAs goes through the Glenforsa Airfield circuit, which would make operations there impossible and potentially materially damage the airfield enterprise. Glenforsa Airfield is a popular destination for GA pilots, becoming busy with GA activity from April onwards and during the summer months, and is also a

necessary diversion airfield. Even when the airfield is closed, some pilots have permission from the operator to land with notice. There was concerned expressed by the airfield operator, local flying clubs, as well as individuals within and organisations representing the GA community. Circuits tend to be 1nm of the sea; however, 'bomber circuits' can be flown which extends to 1.5nm. We did receive a suggestion from some stakeholders from within the GA community to reroute along the north coast of the Sound of Mull or reroute altogether to the south of Island of Mull, as well as a suggestion to make the corridors narrower, particularly over the water to the east of Glenforsa, away from circuit traffic.

5.4.2 Sponsor response and mitigations

Skyports proposed to move the TDA away from the Glenforsa to the north of the Sound of Mull and reducing the dimensions (horizontal and vertical) of the Tobermory-Craignure TDA to minimise the impact on access to this popular aircraft, which can be busy between April and October. At this section, Skyports proposes to operate a 'constrained leg', whereby the SUA is able to operate within a narrower corridor for a small section of the TDA. See Figures 8 and 9.

As soon as the SUA flies within a constrained leg, the only available SUA automated or commanded action is emergency landing. Orbiting, return-to-home and contingency landing commands are unavailable, limiting the options available to the Remote Pilot in the event of an emergency; therefore, we are able to safely accommodate a constrained leg but not elsewhere within the proposed designs. During a constrained leg, the flight geography is defined as 20m either side of the SUA (40m wide corridor). The SUA will remain within this volume based on the Contingency Volume being smaller and represents the only possible landing areas for a worst-case emergency landing.

The boundary of the TDA accommodating the constrained leg measures 1.76nm from the centreline of the runway at Glenforsa Airfield, guaranteeing access at all times. We understand this to be satisfactory since Glenforsa does not have an ATZ/FRZ. The weather mitigation to avoid operations if the cloud base is below 1500ft AMSL and if visibility of equal to or greater than 1500m is not met, will ensure the airfield is always accessible as a diversion and emergency landing site.

FIGURE 8: DISTANCE OF CONSTRAINED LEG IN TOBERMORY - CRAIGNURE TDA RELATIVE TO CENTRELINE OF GLENFORSA AIRFIELD

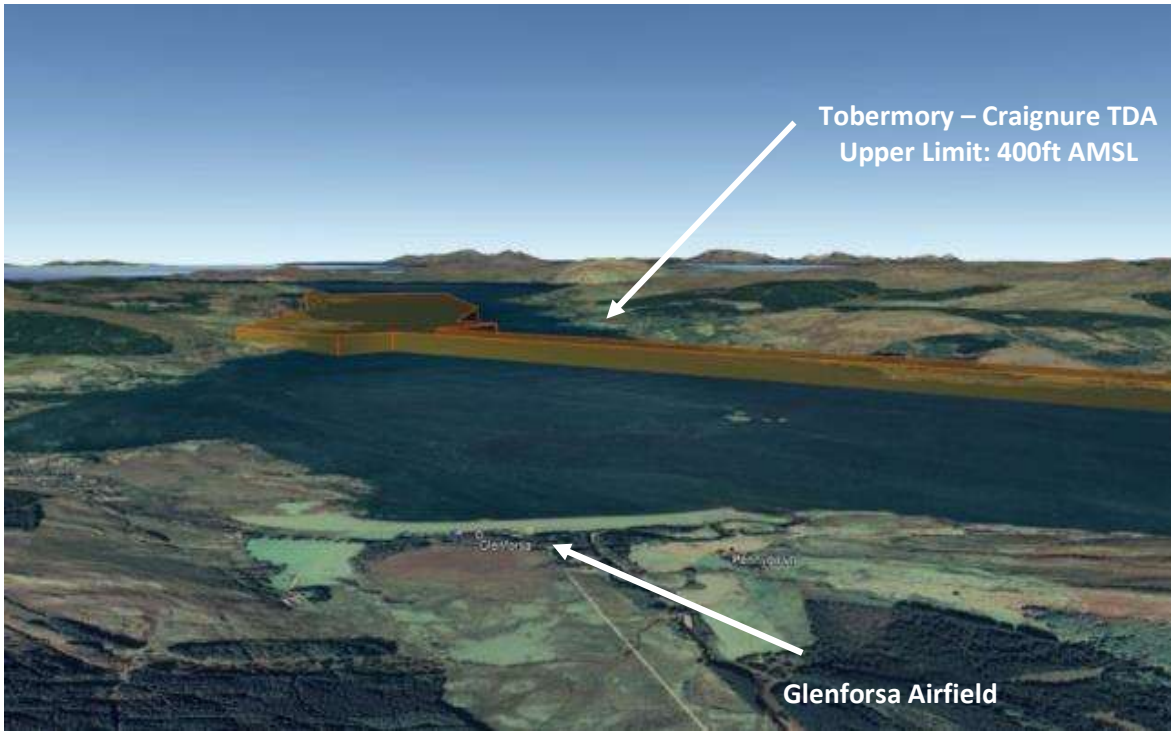

FIGURE 9: 3D VISUAL OF TOBERMORY - CRAIGNURE TDA RELATIVE TO GLENFORSA AIRFIELD

Skyports can also agree to operating between Tobermory-Craignure (past Glenforsa and along the Sound of Mull) during the first two weeks of the proposed three-week period of operations. After those two weeks, Skyports would operate along other routes and the TDAs linking Coll to Craignure via Tobermory would not be activated for the remainder of the period of operations.

Finally, due to the popularity of the area and airfield, if there were to be any big events taking place at Glenforsa on a given day, Skyports can agree not to operate the route past Glenforsa Airfield on those days, which we would agree with the airfield operator once the event schedule is agreed. We have also agreed not to operate on weekends and any Bank Holidays, when the area is likely to be busiest for private aircraft. See 5.4 Activation.

5.5 Activation

5.5.1 Summary of stakeholder responses

Many responders – individuals and organisations within and representing the GA community – were concerned about lengthy TDA activations, activations when there were no operations and few details provided about likely activation times, which would have the effect of misusing the airspace and unfairly excluding other aviation stakeholders from accessing the airspace.

Pilots travelling from further afield, for example the south of England with a vague flight schedule, would need more notice that the 24-hours NOTAM warning as they may depart their original destination some days ahead of their likely arrival in the area. We received a suggestion from some stakeholders, particularly individuals from within the GA community, to derogate from the usual requirements for a 24-hour notification period with airspace activated 'on demand' to facilitate an 'on demand' service for the NHS. We also received a suggestion from a number of stakeholders within the GA community to operate at night to reduce conflicts with other traffic during the day, when the airspace is likely to be busier.

5.5.2 Sponsor response and mitigations

Skyports has confirmed with aviation stakeholders that we will not be activating the entirety of the TDA complex at the same time. Only TDAs required to facilitate flights on a given day or over a given period will

be activated. All of the other TDAs in the complex will remain inactive and the airspace accessible to others. Figures 4, 5, 6 and 7 show the route combinations.

Skyports has also confirmed that TDAs will not be activated for blanket 24-hour periods or for 24-hour periods for several days at a time. Skyports intends to use the TDAs only when required and will deactivate TDAs if they are no longer required.

Apart from the Lorn & Islands Hospital (Oban) and the Mull & Iona Community Hospital (Craignure), all other facilities have limited operating hours. We therefore expect activation of TDAs facilitating routes to service these locations to be limited to half days or less, and not the whole day.

Skyports cannot provide a more specific timetable or narrower activation times in order to preserve flexibility to provide an on-demand service for the NHS; however, if we cannot operate within TDAs already activated for whatever reason, for example poor weather or a technical problem, we will deactivate the TDA(s) as soon as that decision is taken.

TDAs will be activated by NOTAM at least 24 hours before the commencement of operations, which is a requirement of the CAA. Skyports did ask whether derogation was possible following suggestions from some stakeholders, but this was not possible with the CAA. Where possible, Skyports will aim to activate TDAs further in advance. Some advance warning will also help stakeholder flying from further afield who request further notice.

Skyports can commit to not operating weekends or Bank Holidays to minimise impacts when the area is likely to be busiest with private aircraft, and we will not operate, not activate or deactivate as soon as possible unwanted TDAs if the cloud base falls below 1500ft AMSL or visibility degrades to less than 1500m. We have also reduced the duration of operations from 4 weeks and 2 days to 3 weeks and 1 day in order to avoid operating in May when the airspace can be at its busiest.

Finally, Skyports is now able to operate its UAS safely at night and will do if there is a requirement to meet the demands of the NHS, which are seeking the majority of operations to take place during the day.

5.6 Communication

5.6.1 Summary of stakeholder responses

The majority of organisation and individual respondents felt it was necessary for a telephone number and DAAIS facility to be provided, and to appear on the NOTAM, that would provide stakeholders with a means to get real-time updates on the status of TDAs and to get clearance to enter areas of the TDA that are inactive for a particular time. Some other stakeholders, particularly from within the GA community, would prefer a DACS to be provided. Blue light services must be able to communicate with Skyports to confirm that the airspace is clear if they need to enter an active TDA(s), particularly at short notice, and if they are unable to do this by telephone in advance.

A number of organisation and individual stakeholders, particularly within the GA community were concerned about the poor quality of radio communications at low levels and behind hill elevations; many areas are beyond Radio Line of Sight.

Some stakeholders asked whether the UAS was fitted with EC, since most LAA and BMAA aircraft transmit ADS-B SIL=0 as this would give valuable situational awareness information to pilots operating in the area.

5.6.2 Sponsor response and mitigations

Skyports will provide the telephone numbers of its Flight Crew, which will be available on the NOTAM, so that they can be contacted at all times during periods of activation.

A DAAIS will be provided throughout the proposed period operations and TDA activations will not take place without a DAAIS being available. The Operating Authority will be Scottish Information and a FISO will

be available between 08:00 and 20:00 local time. Oban Information will also be available during its ATC opening hours.

Skyports will put in place a TOI with agreed procedures that will enable blue light services and scheduled commercial operators to access active TDAs at all times. We can consider the inclusion of other commercial operators on a case-by-case basis if access to any parts of the TDA is essential to their business; however, entry to an active TDA will depend on the DAAIS being able to accommodate this type of activity. The more notice that Skyports can be given the better.

Acknowledging the poor-quality radio coverage in that area at low levels and behind hill elevations, routing at which VFR traffic will need in the event of poor weather, Skyports will not operate if the cloud base is below 1500ft AMSL and if visibility is less than the 1500m.

In addition, Skyports SUA is fitted with ADS-B IN and OUT with SIL/SID=0 and will therefore be visible to pilots on their navigation system (if they are using one), especially as private aircraft can emit uncertified ADS-B. Skyports will also be able to monitor the location of other aircraft fitted with Electronic Conspicuity (EC) if they are broadcasting OUT.

5.7 Aircraft Avoidance

5.7.1 Summary of stakeholder responses

Some stakeholders, particularly individuals and organisations within and representing the GA community, were concerned about what would happen if another aircraft accidentally entered an active TDA or entered in an emergency, especially as accidental infringement is possible, and mistakes are sometimes made.

5.7.2 Sponsor response and mitigations

In the event that another aircraft entered an active TDA in which the SUA was operating and/or was already airborne, and that other aircraft was fitted with ADS-B and broadcasting OUT, the Skyports Flight Crew will monitor the feed on the ground control station (GCS) and will initiate a loiter maneuver in the event that a potential airspace intruder is detected. Pilots of other aircraft, especially those that are not fitted with a transponder, could avoid the Skyports SUA visually as it is fitted with lights and a strobe to maximise visibility.

5.8 Emergency Services

5.8.1 Summary of stakeholder responses

Some stakeholders, particularly individuals within and organisations representing the GA community, were concerned about denial of access to airspace used by the air ambulance services and coastguard helicopters, which is an essential 24/7 facility, which could delay an evacuation and lead to poor patient outcome. Emergency services and their operators requested that Skyports acknowledge their primacy in proposed area of operations and the imperative for them to be able to access an active TDA at all times, including when tasked at the last minute and when they need access to the helipad at Lorn & Islands Hospital for refueling.

5.8.2 Sponsor response and mitigations

Skyports acknowledges the primacy of blue light helicopter services, regardless of whether a TDA(s) is active. Skyports has tried and tested procedures, codified in past TOIs agreed with the emergency services. If Skyports receives notification that a blue light helicopter needs to access an active TDA(s), we will ground the SUA at the soonest and safest opportunity and remain grounded until we receive confirmation from the emergency services directly or via the DAAIS that the emergency operation is completed, and the airspace is clear.

5.9 Military Operations

5.9.1 Summary of stakeholder responses

Some stakeholders, particularly individuals within and organisations representing the GA community, were concerned about the prospect of low-flying military aircraft being endangered by an SUA flying in the area. The area around Glenforsa Airfield is a highland low level tactical area. Exercise Joint Warrior takes place twice a year throughout the west coast of Scotland and involves large scale participation of ships, fixed-wing aircraft and helicopters from the RAF, RN as well as the UK's NATO partners.

5.9.2 Sponsor response and mitigations

Skyports has engaged the military about this proposal and received a response that the Ministry of Defence (MOD) have no objections to the proposals as it only has a minor impact on MOD operations. The MOD welcomed the mitigations put in place – activation by NOTAMs, only for the timescales required and a means for the MOD to contact Skyports – in case of urgent operational requirement to enter the airspace. In the event that the military require access to the airspace for any reason, Skyports will cease operations immediately, will remain grounded until the military operation is completed and will only resume UAS operations when clearance is received from the military – either directly by phone or by an Oban Information or Scottish Information FISO.

5.10 Targeted Stakeholder Engagement Exercise

5.10.1 Summary of stakeholder responses

A large number of stakeholders, particularly individuals and organisations within and representing the GA community, felt that the reduced engagement period was insufficient, and some questioned the decision to not commence the engagement exercise until the new year. In addition, a sizeable number of stakeholders were unhappy that they had not been identified and engaged directly, relying instead on notification by another party or through one of their industry groups and that this resulted in a flawed engagement exercise. Some stakeholders, particularly individuals from within the GA community based further afield, felt that Skyports should have publicised the change and engaged much more widely, since aircraft flying in the region will originate from other areas of the United Kingdom or even further. A number of stakeholders thought the engagement exercise should have been extended further or repeated with final revised proposals. Finally, some stakeholders, mainly individuals from within the GA community, did not think the engagement process was very transparent because the ACP sponsor collates responses, stakeholders are not able to see if other stakeholders had responded and other stakeholders cannot see the content of others' responses.

5.10.2 Sponsor response and mitigations

Skyports was guided by a similar approach to stakeholder identification to that completed during ACPs in the same area/vicinity of this proposed area of operations, which had been successfully approved by the CAA (on two occasions now), who had determined that the level of engagement undertaken by the change sponsor had been, in those cases, proportionate for those ACPs. Nevertheless, we have developed a deeper knowledge of the area of operations at this time of year as a consequence of this exercise and appreciate the high levels of engagement and knowledge sharing with the goal of achieving the highest levels of flight safety, which is vital for all concerned.

While some stakeholders learnt of the ACP and engagement exercise from other stakeholders, a sufficiently broad range of types of stakeholders have been engaged to ensure the key issues have been identified. For this reason, we do not see a case for repeating the engagement exercise since the same key issues have been raised by a wide range of stakeholders and in multiple geographic locations. Further, we consider it would have been disproportionate to the size and duration of the change to contact all UK flying clubs and schools, for example, hence why we contacted representative bodies identified from the NATMAC stakeholder list to represent their members further afield from the local area of operations.

Skyports decided not to open the engagement window over the Christmas period as we did not think this would achieve the goal of achieving good engagement; therefore, we waited until the new year. Skyports had been advised by the CAA previously that engagement over public holidays/holiday periods may lead to poor engagement and should be taken into consideration. We have 95 organisation and individual responses in total and thank all aviation stakeholders for providing their much-valued input. Skyports did extend the engagement period by a week and accepted submissions around a week after the revised closing date of 31 January 2021 for those that needed more time or heard about the exercise very near the closing dates.

Skyports acknowledges that the issuance of revised proposals during the engagement period could place unreasonable burdens on stakeholders; however, we decided to share details of the revisions to some aspects of our plans, which had been done in response to feedback received, as quickly as possible so they had a chance to provide any further feedback. The pace of Skyports' communications with stakeholders was praised by some as being efficient.

The constructive criticism of our approach generally by some stakeholders will be taken in the spirit in which it has been given and we look forward to working closely with many new stakeholders should we need to undergo another airspace change in the future either in this area or others.

Regarding concerns about the transparency of the ACP process, Skyports followed the process requirements of CAA Policy for the Establishment of Permanent and Temporary Danger Areas – 20200721. Skyports recommends that stakeholders who are concerned about the transparency of the airspace process to discuss with CAA Airspace Regulation.

5.11 Scheduled commercial services

5.11.1 Summary of stakeholder responses

The proposed TDAs take place in an area known to be on the approach path 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. High terrain to the north and east of Oban means that the only safe VFR arrivals is from the south and west. In addition, scheduled commercial services serve Coll airport, which is close to the destination for the Aringour TDA.

Air transport services to the islands are essential during the ongoing emergency. Scheduled weekend 'scholar' flights are a regular occurrence, transporting young people to and from the mainland to attend school. Charter operations also take place regularly at the weekends. Although currently affected by lockdown measures, operators expect to be running a full schedule by April 2021.

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 limit of 900ft AMSL.

The scheduled service provider ***requested*** that UAS activity should cease and the TDA to be declared inactive whenever commercial passenger operations to and from Oban or Coll airports are scheduled and cloud base are forecast or observed as poor, with the application of an appropriate safety margin either side of planned departure and arrival in case of poor weather, and a resultant need to return to Oban or delay due to poor weather. The operator would ***prefer*** no UA activity to be live when intra-island services are operating but concede that this would constraint vital COVID-19 response.

Scheduled operators insisted on recognition of the primacy of their services and the implementation of robust deconfliction and airspace management process to be in place to enable themselves and other operator to signal their schedules and airspace requirements with Skyports in advance, which Skyports had done successfully with operators during a previous operation.

Northern Lighthouse Board (NLB) have a helicopter landing area on the south side of the bay which is used by PDG Aviation Services for maintenance. These are infrequent but possible during the times of operations.

5.11.2 Sponsor response and mitigations

Skyports acknowledges the essential nature of these scheduled services and recognises their primacy at all times and this will be reflected in the TOI and airspace management process to be agreed with scheduled operators, based on procedures agreed to enable previous UAS BVLOS operations. Skyports will cease operations whenever commercial passenger operations to and from Oban and Coll airports are scheduled and there is poor weather, and will not operate if the cloud base is below 1500ft AMSL and if visibility is less than 1500m as an additional mitigation for scheduled VFR commercial passenger services.

5.12 Carriage of Dangerous Goods

5.12.1 Summary of stakeholder responses

Some stakeholders, particularly individuals from within the GA community, were concerned about the carriage of dangerous goods, specifically pathology samples, by UAS; that this would be an unacceptable and unmitigable risk. In addition, some of these same stakeholders suggested that if the transport of these goods is urgent it would make more sense to send by helicopter, for example.

5.12.2 Sponsor response and mitigations

Skyports will only carry specific classes of dangerous goods if permission has been granted by the CAA for those classes only. We have applied to carry UN3373 by UAS according to process agreed with the CAA Dangerous Goods Office, which includes adherence to the requirements of the ICAO Technical Instructions and the completion of an approved risk assessment. Skyports, therefore, rejects suggestions or recommendations to not carry dangerous goods, unless permission is not received by the CAA.

5.13 Business case

5.13.1 Summary of stakeholder responses

Some stakeholders, particularly individuals and organisations within and representing the GA community, were concerned that this ACP was not a one-off proposal and that the changes could be made permanent for commercial gain in the future. While there was some broad stakeholder support for the operation because of the purpose of working with the NHS to support its response to COVID-19, some stakeholders thought Skyports was being deceitful about its operations, that the change was designed to enable parcel delivery, given no evidence was presented to the contrary. Some stakeholders, particularly individuals and organisations from within the GA community, suggested that the NHS should have considered alternative logistics solutions that may be cheaper than UA; indeed, some individuals and organisation stakeholders from within the GA community highlighted that they had offered their aircraft and services to the NHS and the Government, which had not been taken up.

5.13.2 Sponsor response and mitigations

All changes to airspace are subject to the change process. Any future changes that Skyports intends – either permanent or temporary – would be subject to satisfactory completion of the ACP and the CAA's approval. The CAA will only expedite the commencement of airspace changes in support of COVID-19 operations (not circumventing the ACP process) so long as the change does not support operations for any other cause; therefore, change sponsors cannot use this airspace for another purpose. Skyports will therefore not be carrying out any other operations other than those for the NHS as described in the

engagement material. Skyports has shared communications between us and the NHS seeking support for the drone delivery service with the CAA, which we believe is satisfactory in helping to determine the need for the airspace change and the expediting the progression of the change and prioritisation of the safety case. Skyports is not receiving any payment from the NHS for providing the service. The operation is funded by Skyports and grant funding through a joint initiative by the European and UK Space Agencies, following a drive to find space-enabled technology and services to support the NHS in response to Coronavirus.

Finally, Skyports cannot respond on behalf of the NHS and the Government to provide reasons for not taking up offers from other aircraft owners/operators to help with the response to COVID-19 by carrying supplies.

5.14 Additional points

5.14.1 Summary of stakeholder responses

Some stakeholders, particularly individuals from within the GA community, raised concerns about the potential impacts on local wildlife, such as birds of prey, and the noise impacts of our operations.

5.14.2 Sponsor response and mitigations

Skyports has been working with Nature Scotland and the RSPB to determine routes that avoid nesting birds, particularly birds of prey.

As for the noise impacts, we have selected routes that avoid overflight as far as practicable of local population, principally to avoid the ground risk of our operations, hence operating mainly over the sea.

6 Final change proposals

The following final change proposals are the same as the revised change proposals, which can be found in 4. Revised change proposals.

6.1 TDA Complex

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

Eleven adjacent TDAs are required to facilitate our operations and are designed to minimise the impact on other aviation stakeholders in the area.

6.1.1 Arinagour

Identification and Lateral Limits			**Upper Limit** **Lower Limit**	**Remarks**
	Area bounded by straight lines joining		Lower Limit: SFC Upper Limit: 400ft AMSL	Activity: UAS Beyond Visual Line of Sight (BVLOS) Hours: When notified DAAIS: Scottish Info FREQ: 127.275/119.875Mhz Oban Info FREQ: 118.055Mhz
WP	**LON**	**LAT**		
1	-6.12995	56.65058		
2	-6.54176	56.59795		
3	-6.56259	56.62822		
4	-6.51564	56.63697		
5	-6.50772	56.62343		
6	-6.11787	56.67179		
7	-6.03843	56.64018		
8	-6.06870	56.63078		

				TEL: TBC (Skyports Flight Operations Manager). TBC (Skyports Flight Operations Lead) Sponsor: Skyports

6.1.2 Tobermory Bay

Identification and Lateral Limits			**Upper Limit** **Lower Limit**	**Remarks**
	Area bounded by straight lines joining		Lower Limit: SFC Upper Limit: 550ft AMSL	Activity: UAS Beyond Visual Line of Sight (BVLOS) Hours: When notified DAAIS: Scottish Info FREQ: 127.275/119.875Mhz Oban Info FREQ: 118.055Mhz TEL: TBC (Skyports Flight Operations Manager). TBC (Skyports Flight Operations Lead) Sponsor: Skyports
WP	**LON**	**LAT**		
1	-6.06870	56.63078		
2	-6.03844	56.64019		
3	-6.00609	56.61224		
4	-6.03631	56.60310		

6.1.3 Tobermory

Identification and Lateral Limits			**Upper Limit** **Lower Limit**	**Remarks**
	Area bounded by straight lines joining		Lower Limit: SFC Upper Limit: 600ft AMSL	Activity: UAS Beyond Visual Line of Sight (BVLOS) Hours: When notified DAAIS: Scottish Info FREQ: 127.275/119.875Mhz Oban Info FREQ: 118.055Mhz TEL: TBC (Skyports Flight Operations
WP	**LON**	**LAT**		
1	-6.10764	56.61939		
2	-6.06872	56.63078		
3	-6.03625	56.60305		
4	-6.08424	56.59374		

				Manager). TBC (Skyports Flight Operations Lead) Sponsor: Skyports

6.1.4 Tobermory - Craignure

Identification and Lateral Limits			**Upper Limit** **Lower Limit**	**Remarks**
	Area bounded by straight lines joining		Lower Limit: SFC Upper Limit: 400ft AMSL	Activity: UAS Beyond Visual Line of Sight (BVLOS) Hours: When notified DAAIS: Scottish Info FREQ: 127.275/119.875Mhz Oban Info FREQ: 118.055Mhz TEL: TBC (Skyports Flight Operations Manager). TBC (Skyports Flight Operations Lead) Sponsor: Skyports
WP	**LON**	**LAT**		
1	-5.74101	56.48589		
2	-5.79202	56.52109		
3	-5.80669	56.52394		
4	-5.80372	56.52914		
5	-5.96053	56.55664		
6	-5.96336	56.55290		
7	-5.98155	56.55663		
8	-5.99695	56.57754		
9	-6.03087	56.60483		
10	-6.00608	56.61224		
11	-5.97551	56.58570		
12	-5.96251	56.56751		
13	-5.95561	56.56598		
14	-5.95873	56.56035		
15	-5.81379	56.53409		
16	-5.80218	56.53192		
17	-5.79923	56.53688		
18	-5.77800	56.53279		
19	-5.72436	56.49621		

6.1.5 Craignure

Identification and Lateral Limits			**Upper Limit** **Lower Limit**	**Remarks**
	Area bounded by straight lines joining		Lower Limit: SFC Upper Limit: 400ft AMSL	Activity: UAS Beyond Visual Line of Sight (BVLOS)
WP	**LON**	**LAT**		
1	-5.74941	56.48061		

2	-5.71625	56.50134		Hours: When notified DAAIS: Scottish Info FREQ: 127.275/119.875Mhz Oban Info FREQ: 118.055Mhz TEL: TBC (Skyports Flight Operations Manager). TBC (Skyports Flight Operations Lead) Sponsor: Skyports
3	-5.68134	56.48738		
4	-5.71391	56.46573		

6.1.6 Craignure – Oban

Identification and Lateral Limits			**Upper Limit** **Lower Limit**	**Remarks**
	Area bounded by straight lines joining		Lower Limit: SFC Upper Limit: 400ft AMSL	Activity: UAS Beyond Visual Line of Sight (BVLOS) Hours: When notified DAAIS: Scottish Info FREQ: 127.275/119.875Mhz Oban Info FREQ: 118.055Mhz TEL: TBC (Skyports Flight Operations Manager). TBC (Skyports Flight Operations Lead) Sponsor: Skyports
WP	**LON**	**LAT**		
1	-5.70710	56.47030		
2	-5.68135	56.48738		
3	-5.55191	56.43264		
4	-5.57955	56.41542		

6.1.7 Kerrera

Identification and Lateral Limits			**Upper Limit** **Lower Limit**	**Remarks**
	Area bounded by straight lines joining		Lower Limit: SFC Upper Limit: 600ft AMSL	Activity: UAS Beyond Visual Line of Sight (BVLOS) Hours: When notified
WP	**LON**	**LAT**		
1	-5.57950	56.41548		
2	-5.55182	56.43264		

3	-5.48892	56.40592		DAAIS: Scottish Info FREQ: 127.275/119.875Mhz Oban Info FREQ: 118.055Mhz TEL: TBC (Skyports Flight Operations Manager). TBC (Skyports Flight Operations Lead) Sponsor: Skyports
4	-5.52711	56.39323		

6.1.8 Oban

Identification and Lateral Limits			**Upper Limit** **Lower Limit**	**Remarks**
	Area bounded by straight lines joining		Lower Limit: SFC Upper Limit: 750ft AMSL	Activity: UAS Beyond Visual Line of Sight (BVLOS) Hours: When notified DAAIS: Scottish Info FREQ: 127.275/119.875Mhz Oban Info FREQ: 118.055Mhz TEL: TBC (Skyports Flight Operations Manager). TBC (Skyports Flight Operations Lead) Sponsor: Skyports
WP	**LON**	**LAT**		
1	-5.46893	56.41233		
2	-5.43918	56.39400		
3	-5.44500	56.37569		
4	-5.50220	56.37017		
5	-5.52704	56.39325		

6.1.9 Oban – Bunessan Sea 1

Identification and Lateral Limits			**Upper Limit** **Lower Limit**	**Remarks**
	Area bounded by straight lines joining		Lower Limit: SFC Upper Limit: 750ft AMSL	Activity: UAS Beyond Visual Line of Sight (BVLOS) Hours: When notified
WP	**LON**	**LAT**		
1	-5.50221	56.37018		
2	-5.54583	56.35648		

3	-5.56454	56.38161		DAAIS: Scottish Info FREQ: 127.275/119.875Mhz Oban Info FREQ: 118.055Mhz TEL: TBC (Skyports Flight Operations Manager). TBC (Skyports Flight Operations Lead) Sponsor: Skyports
4	-5.52704	56.39325		

6.1.10 Oban – Bunessan Sea 2

Identification and Lateral Limits			**Upper Limit** **Lower Limit**	**Remarks**
	Area bounded by straight lines joining		Lower Limit: SFC Upper Limit: 400ft AMSL	Activity: UAS Beyond Visual Line of Sight (BVLOS) Hours: When notified DAAIS: Scottish Info FREQ: 127.275/119.875Mhz Oban Info FREQ: 118.055Mhz TEL: TBC (Skyports Flight Operations Manager). TBC (Skyports Flight Operations Lead) Sponsor: Skyports
WP	**LON**	**LAT**		
1	-5.54586	56.35650		
2	-5.83215	56.28463		
3	-6.16890	56.27076		
4	-6.15191	56.29765		
5	-5.84348	56.31104		
6	-5.56454	56.38159		

6.1.11 Bunessan

Identification and Lateral Limits			**Upper Limit** **Lower Limit**	**Remarks**
	Area bounded by straight lines joining		Lower Limit: SFC Upper Limit: 450ft AMSL	Activity: UAS Beyond Visual Line of Sight (BVLOS) Hours: When notified
WP	**LON**	**LAT**		
1	-6.25494	56.33057		
2	-6.20793	56.33338		

3	-6.15193	56.29770		DAAIS: Scottish Info FREQ: 127.275/119.875Mhz Oban Info FREQ: 118.055Mhz TEL: TBC (Skyports Flight Operations Manager). TBC (Skyports Flight Operations Lead) Sponsor: Skyports
4	-6.16889	56.27074		
5	-6.25636	56.30893		

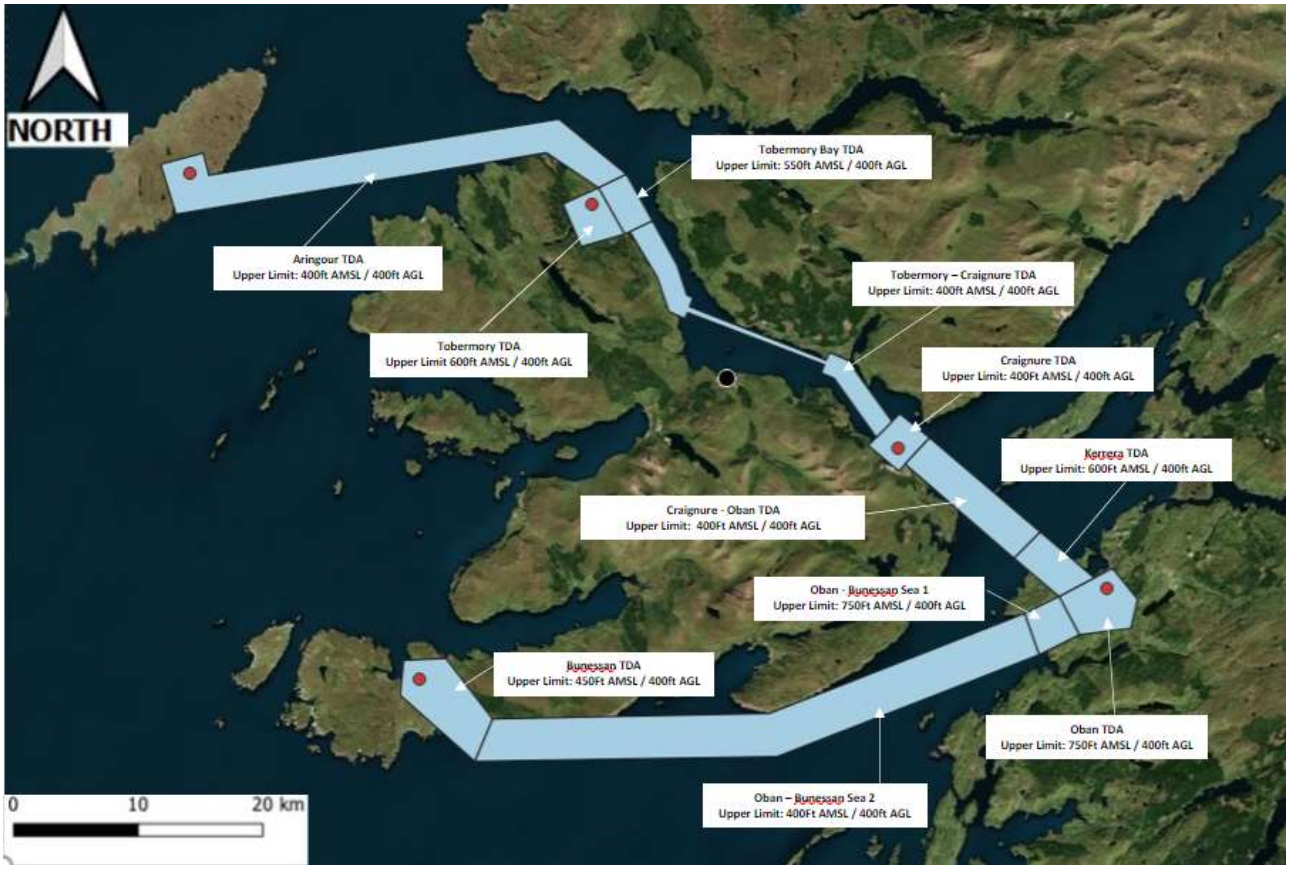

FIGURE 3: TOP DOWN VIEW OF FINAL CHANGE PROPOSALS

6.2 Implementation

Skyports will collate, monitor and report to the CAA on stakeholder feedback received by telephone, email or any other means during the period of the TDA complex. Skyports will provide details of the level and contents of any stakeholder feedback to the CAA on a two-week basis throughout the duration of the TDA starting from the date of the first activation. We would communicate this and the means to provide this information to all stakeholders should the ACP be approved. Should the feedback received, and in consultation with the CAA, lead to any changes to the operation of the TDA complex, Skyports will also communicate this to all stakeholders.

7 Stakeholders

7.1 Civil Aviation Authority

The CAA is being engaged at every stage of the ACP.

7.2 Aviation stakeholders

The following provides a description of the engagement with aviation stakeholder organisations. Individuals who provided a response have not been included as we would not have had their contact details available to include them in the initial outreach email.

We received responses from 36 organisations and 56 individuals. Of the 56 individuals, all were from the GA community.

All stakeholder responses – organisations and individuals – can be viewed in a separate document: *Summary Report – Targeted Aviation Stakeholder Responses*.

Of the initial stakeholders who supported or expressed no opposition to the proposal, none subsequently changed their minds throughout the engagement process. Of those who initially had concerns or objected to the proposal, 6 stakeholders (all from the GA community) changed their mind, given either further clarification on the operation or based on the revisions contained within version 2 and/or version 3 of the proposals. The 1500ft cloud base limitation (contained within v3) was generally the most well received revision.

Those who had concerns relating to the ACP process or proposed designs were mainly from the GA community. These stakeholders were all subsequently engaged with on an individual basis in an attempt to address specific concerns.

IMPORTANT: The colour coding has merely been chosen to clearly show whether emails have been sent and responses received. The red or green does not signify opposition or support.

Organisation Type	Organisation Name	Initial Outreach Email (11/01/21)	Extension Email (20/01/2021)	Version 2 Email (22/01/2021)	Reminder Email & Version 3 (28/01/2021)	Response	Identified post initial outreach
Representative	Aircraft Owners and Pilots Association (AOPA)	Yes	Yes	Yes	Yes	No	
Flight Training	Alexander Air Flight Training	No	No	No	Yes	Yes	
Flying Club	Argyll Aero Club	No	No	No	Yes	Yes	Yes (28/01/21)

Representative	Airspace4All	Yes	Yes	Yes	Yes	No	
Representative	Airfield Operators Group (AOG)	Yes	Yes	Yes	Yes	No	
Air Transport Operator	Air Task/Hebridean Air Services	Yes	Yes	Yes	Yes	Yes	
Representative	Association of Remotely Piloted Aircraft Systems	Yes	Yes	Yes	Yes	Yes	
Emergency Services	Babcock International (Police and Charity Air Ambulance)	No	No	No	No	Yes	
Representative	British Balloon and Airship Club	Yes	Yes	Yes	Yes	Yes	
Representative	British Business Aviation and General Aviation Association	Yes	Yes	Yes	Yes	No	
Representative	British Gliding Association (BGA)	Yes	Yes	Yes	Yes	Yes	
Representative	British Hang Gliding and Paragliding Association	Yes	Yes	Yes	Yes	No	

Representative	British Helicopter Association	Yes	Yes	Yes	Yes	Yes	
Representative	British Microlight Aircraft Association / General Aviation Safety Council (GASCo)	Yes	Yes	Yes	Yes	No	
Representative	British Skydiving	Yes	Yes	Yes	Yes	No	
Service Provider (SAR)	Bristow Helicopters	Yes	Yes	Yes	Yes	No	
Airfield	Bute Airfield	No	No	No	Yes	No	Yes (28/01/21)
Flight Training	Carlisle Flight Training	No	No	No	Yes	No	Yes (28/01/21)
Flying Club	Cheshire Flying Club	No	No	No	Yes	Yes	
Airfield	Colonsay Airstrip Owner	No	No	No	No	No	Yes (28/01/21)
Flying Club	Connel Flying Club	No	Yes	Yes	Yes	Yes	

Commercial	Cormack Aircraft Services Ltd	No	No	No	Yes	Yes	Yes (28/01/21). Extension agreed.
Flying Club	East of Scotland Microlights	No	No	No	Yes	Yes	
Flight Training	Eshott School of Flying	No	No	No	Yes	No	Yes (28/01/21)
Flying Club	Double Whisky Flying Club	No	No	No	No	Yes	
Representative	East of Scotland Strut	No	No	No	No	Yes	
Commercial	Freedom Aviation	No	No	No	No	Yes	
Emergency Services	Gama Aviation (Scottish Air Ambulance)	Yes	Yes	Yes	Yes	Yes	
General Aviation	General Aviation Alliance (GAA)	Yes	Yes	Yes	Yes	Yes	
Flying Club	Glasgow Flying Club	No	No	No	Yes	No	Yes (28/01/21)

General Aviation	Glenforsa Airfield	Yes	Yes	Yes	Yes	Yes	
Flying Club	Grampian Microlight & Flying Club	No	No	Yes	Yes	Yes	
Representative	Helicopter Club of Great Britain (HCAB)	Yes	Yes	Yes	Yes	No	
Flight Training	Highland Aviation	No	No	No	Yes	No	Yes (28/01/21)
Commercial	Hillhouse Estates	No	No	No	No	Yes	Yes (28/01/21)
Flying Club	Lanark and Lothian Soaring Club	Yes	Yes	Yes	Yes	Yes	
Flight Training	Leading Edge	No	No	No	Yes	No	Yes (28/01/21)
Representative	Light Aircraft Association (LAA)	Yes	Yes	Yes	Yes	Yes	
Commercial	Loch Lomond Seaplanes	No	No	No	No	Yes	

Emergency Services	Maritime and Coastguard Agency	Yes	Yes	Yes	Yes	No	
Commercial	Miles Airwork Ltd	No	No	No	No	Yes	
Military	Ministry of Defence	Yes	Yes	Yes	Yes	Yes	
Flying Club	Moray Flying Club	No	No	No	Yes	No	Yes (28/01/21)
ANSP	NATS (NERL)	Yes	Yes	Yes	Yes	Yes	
Aerodrome	Oban and the Isles Airport	Yes	Yes	Yes	Yes	Yes	
Flying Club	OIC Leuchars Flying Club	No	Yes	Yes	Yes	Yes	
Air Service Operator	PDG Aviation	Yes	Yes	Yes	Yes	Yes	
Flight Training	Phoenix Flight Training School	No	No	No	Yes	No	Yes (28/01/21)

Emergency Services	Police Scotland Air Support Unit (via Babcock International)	Yes	Yes	Yes	Yes	Yes	
Flight Training	Prestwick Flight Centre	No	No	Yes	Yes	Yes	Yes (28/01/21)
Flying Club	Prestwick Flying Club	No	No	No	No	No	Yes (28/01/21)
Commercial Operator	Scotia Seaplanes	No	Yes	Yes	Yes	Yes	
Flying Club	Scottish Aero Club	No	No	Yes	Yes	Yes	
Representative	Scottish Aeromodellers Association	No	No	No	Yes	Yes	Yes (28/01/21)
Flying Club	Scottish Airsports Club	No	No	No	No	Yes	Yes (28/01/21). Extension agreed.
Emergency Services	Scottish Ambulance Service (via Gama Aviation)	Yes	Yes	Yes	Yes	Yes	
Association	Scottish Association for Marine Sciences	Yes	Yes	Yes	Yes	No	

Flying Club	Scottish Mountain Paragliding Club	No	No	Yes	Yes	Yes	
Airfield	Strathaven Airfield	No	No	No	Yes	No	Yes (28/01/21)
Service Provider	Skyhook Helicopters	Yes	Yes	Yes	Yes	No	
Flight Training	Tayside Aviation	No	No	No	Yes	No	Yes (28/01/21)
Flying Club	Ulster Flying Club	No	No	No	Yes	No	Yes (28/01/21)
Representative	Ulster Seaplane Association	No	No	No	Yes	Yes	Yes (28/01/21)
Representative	West of Scotland Strus	No	No	No	No	Yes	

8 Appendices

Appendix A: Skyports targeted aviation stakeholder engagement response form

Appendix B: Response form

Name	
Organisation name	
Position in the organisation	
Email	

Feedback

Appendix B: Initial email to aviation stakeholders

From: [redacted]
Sent: 11 January 2021 07:33
To: [redacted]
Cc:
Subject: Airspace Change ACP-2020-099 UAS BVLOS in Segregated Airspace (Oban-Isle of Mull-Coll) – Targeted Aviation Stakeholder Engagement
Attachments: ACP-2020-099 Skyports - Oban-Mull-Coll - Targeted Av Stakeholder Eng Material.pdf

Dear [redacted]

Skyports, a UK-based drone delivery service provider, is contacting you with regards to airspace change proposal ACP-2020-099 to enable the operation of small unmanned aircraft (SUA) beyond visual line of sight (BVLOS) so that we can support the NHS in Scotland with its ongoing response to COVID-19.

Skyports is therefore contacting you in order to seek your views and feedback on these airspace designs in the form of a targeted aviation stakeholder engagement exercise required as part of 20200721 – CAA Policy for the Establishment of Permanent and Temporary Danger Areas (as scaled down version of CAP1616).

We believe our designs allow us to safely execute on our operations whilst minimising negative impacts on other airspace users.

I attach the documentation related to our targeted aviation stakeholder engagement exercise for this change proposal, which includes the engagement document containing a response form; however, you may prefer to simply provide feedback by email.

I would appreciate your views and feedback on these designs please.

As I hope you will understand, we need to turn this airspace change around as quickly as possibly due to the COVID-19 healthcare imperative for the NHS in Scotland, so I would greatly appreciate it if you could please provide feedback by responding to this email by **midnight on Sunday 24th January 2021**.

We understand that this timeframe is shorter the standard 12-week engagement and shorter than the scaled 6-week engagement; however, we have already completed two targeted stakeholder engagement exercises in the Oban area during 2020 (ACP-2020-038 and ACP-2020-055) and so already have a comprehensive picture of how the airspace used and by whom. Indeed, the CAA agrees that these timescales are proportionate given the similar location of this ACP and the previously completed engagement exercises. If you think this timeframe is too challenging, please let me know so that we can make allowances accordingly.

IMPORTANT NOTE: Skyports has recently engaged aviation stakeholders on another airspace around the Oban area (ACP-2020-055). While the engagement exercise for ACP-2020-055 has been completed, the broader airspace change process is still ongoing. The two proposals have been assigned separate CAA reference numbers. This one is ACP-2020-099 (Oban-Isle of Mull-Coll). When providing your feedback, please make sure you are providing your views on the correct airspace change proposal.

Many thanks in advance and kind regards,

[redacted]

Skyports

1

Appendix C: First reminder email to aviation stakeholders

From: [redacted]
Sent: 22 January 2021 13:42
Subject: Version 2 ACP-2020-099 Oban-Mull-Coll Targeted Aviation Stakeholder Engagement Material
Attachments: ACP-2020-099 Skyports - Oban-Mull-Coll - Targeted Av Stakeholder Eng Material v2.0.pdf

Good afternoon,

Thank you to all those that have submitted comments, raised issues, asked questions, shared information and proposed alternatives and solutions. We appreciate that you have taken the time to do this and for all your contributions to date.

We have received numerous submissions which have revealed some common themes and issues that we recognise need addressing.

Please find attached an updated stakeholder engagement document (v2.0) with contains a new Appendix C (page 19) that highlights the most significant and common issues and our response and proposed solutions to those issues. We have also made some changes to other parts of the main document to incorporate some of those Appendix C proposed solutions, the full details of which can be found in the Amendment Log.

This version will be uploaded onto the CAA Airspace Changer Portal for this proposed change: https://airspacechange.caa.co.uk/PublicProposalArea?pID=330.

I will, however, provide in this email in brief the main changes that we have made or propose to make, which are as follows:

1. **Glenforsa Airfield:**
o We have rerouted and redesigned the TDA away from Glenforsa so as not to undermine access to the airfield.
o We propose only operating on the route past Glenforsa during the first two weeks.

2. **Activations:**
o We have tried to provide better visibility of what TDAs will be activated together and which will as a consequence will be deactivated.
o We have also provided details of likely length of activations and tried to provide reassurance of deactivation of TDAs outside of notified hours.
o We have removed the Oban-Easdale route which has a TDA Upper Limit that was a little high.
o We can commit to not operating on Saturdays, Sundays or any Bank Holidays that take place during the proposed period of operations.
o We have reduced the duration of operations to 3 weeks and 1 day (8 April - 30 April 2021).
o We are exploring a means of sharing our indicative schedule of operations with stakeholders to provide as much advance notice of what is expected to be happening and when.

3. **TDA Upper Limits:**
o All Upper Limits are expressed in AMSL, which is why they look high, but the unmanned aircraft will not be operating in excess of 400ft AGL – and will be operating lower than that.
o We have reduced the Upper Limits on the TDAs that were higher because of the terrain.

4. **Communicating with Skyports:**
o We will provide a phone number of the flight team on the NOTAM, which will be continually staffed, and can be used for requesting entry into an active TDA.
o We will explore with Oban Information and Scottish Information the provision of a DAAIS so that messages and

1

requests submitted to the FISO can be relayed by phone to Skyports.
o We can confirm that the unmanned aircraft is fitted with ADS-B IN and OUT.

5. **Procedures to cooperate with air traffic services:**
o Further to the point above, we will explore with Oban Information and Scottish Information about sharing our up and down times so that the FISO can communicate with nearby aircraft whether our unmanned aircraft are airborne or not.

6. **Aircraft Avoidance:**
o We can provide confirmation that the unmanned aircraft is fitted with an automatic collision avoidance system in case aircraft were to enter the TDA by accident or emergency.

7. **Night Flying:**
o We have applied to the CAA as part of our operational authorisation to be able to operate BVLOS at night, though to meet the requirements of the NHS which are expected to be largely during daylight hours.

8. Unmanned Aircraft Specification:
o We have provided unmanned aircraft capabilities and limitations.

9. Military level aircraft:
o We are in contact with the military about this proposed change.
o We will not operate if the military requires the same airspace for any low-level training exercises or operations.

We'd be delighted to receive feedback on these proposed solutions either before or as part of final submissions.
A reminder that the deadline for responses has been extended to midnight on Sunday 31st January.

Appendix D: Final reminder email to stakeholders

From: [redacted]
Sent: 28 January 2021 16:32
Subject: ACP-2020-099 Skyports Oban-Mull-Coll Stakeholder Engagement Reminder & Update
Attachments: ACP-2020-099 Skyports - Oban-Mull-Coll - Targeted Av Stakeholder Eng Material v3.0.pdf

Good Afternoon,

Thank you to all those aviation stakeholders who have already responded in relation to ACP-2020-099, your feedback has been greatly appreciated. Based on this feedback we have decided, in addition to the previous amendments in version 2, to limit our operation when cloud base <1500ft AMSL, please see Appendix C, Issues 5 of version 3 attached for additional details. Version 3 can also be found on the Airspace Portal for this change: https://airspacechange.caa.co.uk/PublicProposalArea?pID=330

I wanted to also remind stakeholders and interested parties who haven't done so and wish to do so, to please provide feedback and comment on Skyports' draft airspace designs for ACP-2020-099 (details attached), the deadline for comments is **midnight this Sunday 31 January 2021**.

We would really appreciate any and all feedback please. If, for any reason, you think you may require more time to complete your feedback, please let me know and we can arrange extensions on a case-by-case basis.

Many thanks in advance and kind regards,

[redacted]

Skyports