



Skyports

Skyports Limited

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

Summary Report – Targeted Aviation Stakeholder Responses [REDACTED]

Version 1.0 – Dated: 10 February 2021

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Organisations

Response 1: Air Task Group/Hebridean Air Services



ACP-2020-099 - UAS BVLOS in Segregated Airspace

Targeted Engagement with Aviation Stakeholders

Response Form

Name	[REDACTED]
Organisation name	Airtask Group
Position in the organisation	[REDACTED]
Email	[REDACTED]

Feedback:

Background

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

Note that scheduled weekend 'scholar' flights are a regular occurrence; these transport young people to and from the mainland to attend school. We also regularly fly charter operations at the weekend.

Although currently affected by lockdown measures, we expect to be running a full schedule by April 2021.

Analysis

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

Hebridean operates scheduled services into Coll airport, which is close to the destination for the Aringour TDA.

I note that the UAS will operate at up to 400 agl, and that due to terrain the highest upper limit of the TDA complex is 750 ft amsl. To provide an adequate safety margin I would expect any aircraft crossing the TDA to apply a minimum vertical separation of 500 ft. This in effect drives a minimum altitude of 1250 ft and cloudbase of 1350 ft. This represents a significant increase to our operating minima, which is likely to impact on our ability to deliver our schedule.

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

Mitigations and Proposals

1. The upper limit of the TDA be raised to allow for a 500 ft vertical separation from the maximum proposed operating altitude of the UAS. This more adequately represents the impact of the TDA and provides a margin of separation for crossing traffic. Maximum operating altitude should be predicated on the emergency mode altitude of the air vehicle to cater for the worst-case scenario. The 500 ft separation allows for altimeter discrepancies between the barometric altimeters fitted to GA aircraft and the GPS-derived altitude of the UAV, and for temporary departures from planned altitude by either manned or unmanned aircraft - note that severe localized turbulence with strong vertical air currents is a frequent occurrence in the lee of the high ground on Mull. **This should be a matter for CAA policy. It is essential to safety that standard 500 ft separation should be applied against an air vehicle operating BVLOS.**
2. Oban Airport should provide a Danger Area Activity Information Service to enable information on the status of UAS activity to be passed in realtime. Robust

communications arrangements should be put in place between the airport and the UAS operator. Alternatively, the UAS operator should provide a DAAIS directly on a promulgated VHF frequency; however we consider the airport option to be preferable. We regard a DAAIS or equivalent as essential to accommodate changes of schedule by either party, and to provide information to aircraft in distress, diversion or operating on behalf of the emergency services. These arrangements worked well in the previous 2020-038.

3. UAS activity should cease and the TDA be declared inactive whenever commercial passenger operations to and from **Oban or Coll** airports are scheduled and visibility and cloudbase are forecast or observed as poor. An appropriate safety margin should be applied either side of planned departure and arrival times. For our scheduled and commercial charter operations we **request** that UAS activity ceases as follows:
 - a. FROM Oban: ETD Oban -15 min to ETA Destination +15 min; or until confirmation received from Oban Information that aircraft has landed
 - b. TO Oban: ETD Airfield of Departure -10 min to clearance of TDA confirmed to UAV operator by Oban Information

Aringour TDA only:

- c. FROM Coll to Tiree: ETD Coll -15 min to ETA Destination +15 min; or until confirmation received that aircraft has landed
 - d. TO Coll from Tiree: ETA Coll +/- 15 min; or until confirmation received that aircraft has landed. Note that aircraft will in all likelihood be continuing to Oban after a short turnround, so the stipulation in b. will then apply.

These margins are to allow for the possibility of the aircraft encountering poor weather and having to return to Oban or Coll, or for reroute and delay due to poor weather being encountered en-route. **Weather limits will be mutually agreed and applied in the Tactical Operating Instruction; we note with approval the proposal to raise the cloudbase at which tactical deconfliction is triggered from 1000 ft to 1500 ft.**

We do not consider that a **complete** deactivation of the TDA complex, as described at Issue 5 (p28) is proportionate or necessary whenever the cloudbase is below 1500 ft. Subject to the deconfliction measures outlined above and in the TOI being applied, the availability of the DAAIS from Oban Tower, and robust communications between ourselves and Skyports, we consider that commercial passenger services and BVLOS UAS activity can safely coexist.

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

4. A robust deconfliction and airspace management process needs to be in place to enable ourselves and other operators to signal our schedules and airspace requirements in advance. As suggested by Skyports, the process could require operators to submit planned movements by an agreed time the previous working day, with an agreed protocol to update planned movements on the day of operation. These arrangements worked well in the previous 2020-038 and we are content with this proposal provided similar

arrangements are in place. We would expect Skyports to presume that our scheduled services are proceeding according to schedule, unless specifically notified by ourselves to the contrary.

5. The limitations and procedures described previously should apply regardless of whether manned aircraft and UAV are fitted with mutually compatible electronic conspicuity systems until greater confidence is gained in the system. However we are strongly supportive of Skyports initiative to introduce ADS-B IN and OUT to the air vehicle and believe this system will offer safety and traffic management benefits. At present the BN2 Islander used on our service is not ADS-B fitted.
6. We would wish to see continued explicit recognition of the **primacy** of commercial scheduled air transport operations, and we are encouraged by Skyports recognition of this position in our interactions to date. This is to enable us to provide confidence to our passengers that a given service will operate.

We would expect that the above points will be addressed in a mutually agreed Tactical Operating Instruction; the TOI provided for ACP 2020055 is acceptable to Airtask, although some additional work will be required to manage the conflict between the Aringour TDA and our Coll services, as described above.

Remarks and Conclusion

Subject to the caveats above, Airtask is confident that, provided the measures suggested above are implemented, that it should be possible to safely and efficiently mix manned and unmanned air operations without significant detriment to both. While we expect our activity levels to be considerably higher than in the previous trial, with continued flexibility, goodwill and close liaison between operators, we are broadly content that operational and safety impacts can be managed to tolerable levels.

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

Personnel Consulted:

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

Response 2: Alexander Air Flight Training

From: [REDACTED]
Sent: 26 January 2021 16:31
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: ACP-2020-038 and ACP-2020-55: Response to Consultation
Attachments: ACP-2020-099 Skyports - Oban-Mull-Coll - Targeted Av Stakeholder Eng Material v2.0.pdf

Dear [REDACTED]

Thank you for your response and your suggestions to use a more southerly route via Bunessan and the DACS/DAAIS service; these are both currently being explored. In answer to your last question, the TDAs proposed are until 30th April 2021.

We also fully agree in integration rather than segregation, and believe this to be the CAA medium/long term plan. Currently we have to operate within the rules which state, until UAS can comply with the requirements for flight in non-segregated airspace, BVLOS UAS flights outside permanently established segregated airspace may be accommodated through the establishment of segregated airspace on a temporary basis.

I gather you have the latest version but have attached the latest stakeholder engagement material for this ACP (ACP-2020-099), which was sent out last Friday (including revisions based on current stakeholder feedback) and now included you in our list of stakeholders and will ensure any future communications regarding this ACP are shared with you.

I also share the cover email below from last Friday, please note the deadline has been extended to 31 January 2021.

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) which 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?plD=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 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 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.

Kind regards,

[Redacted signature]

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[REDACTED]
Sent: 25 January 2021 20:36
[REDACTED]

Subject: ACP-2020-038 and ACP-2020-55: Response to Consultation

Dear Sirs,

Please see attached.

Regards,

[REDACTED]
Alexander Air Ltd

Appendix B: Response form

Name	[REDACTED]
Organisation name	Alexander Air Flight Training
Position in the organisation	[REDACTED]
Email:	[REDACTED]

Feedback

Thoroughness of the stakeholder engagement: Skyports say they have identified the appropriate stakeholders, but I am aware that many of the local aviation organisations such as the flying groups/clubs at Oban and surrounding areas who have only found out by word of mouth. This is evidence that the stakeholder communication has not been sufficiently thorough.

The philosophy for airspace usage should be one of integration not segregation. That is clearly not the case for this proposal. Given that the drone has ADS-B in and out and that most GA aircraft have at least ADS-B out, I would question whether a temporary danger area is required at all.

The sound of Mull is a popular route for GA aircraft routing to/from Oban and the Hebridean Isles. Oban is a busy GA airport in summer because it offers refuelling facilities as well as local accommodation and restaurants. Similarly Glenforsa is a very popular GA airport in all but the winter months. I therefore have two safety concerns related to the proposal:

- Glenforsa arrivals and departures: even with the amended corridor, the proximity of this danger area will increase pilot workload and further compress traffic in what is already a fairly restricted area, increasing the risk of a mid-air collision.
- The Sound of Mull is an important GA route in poor weather. The low cloud bases associated with poor weather will, in conjunction with the danger area, funnel traffic into a smaller area, again increasing the risk of a mid-air collision.

In summary, this northern route should be deleted, and the southern route via Bunessan be used for all drone transits. This will be less convenient to the drone operator but will result in a more equitable use of airspace.

Activation by NOTAM: 24 hours is insufficient time. Many GA pilots plan multi-day trips to this area often covering long distances from their home base (which could easily be in the midlands and the south of England). The short notice nature of the NOTAM is likely to cause problems with visitors to Oban/Glenforsa and, if too restrictive or frequently used, may deter them from coming at all. This will have a significant impact on Glenforsa and on Oban Airport and quite likely beyond (given the importance of Oban as a refuelling stop). There is no suggestion of how often or for how long these NOTAMs will last for. However, they should be kept to as short a duration as is practicable. Given the somewhat messy nature of the Notam system it would be very easy to miss such a Notam. This can be mitigated by the use of a DACS/DAAIS (see below).

Use of Danger Area Crossing Service/Danger Area Activation Information Service (DACS/DAAIS): this is a practical way of integrating drone and GA operations. This service could be provided by Oban Information or Scottish Information and would allow GA traffic to proceed while the drone was airborne. The system is used elsewhere in the UK and should be employed here.

Finally, clinical need. There are two issues here:

- This proposal appears to be purely Covid related. Will the TDA be removed post-pandemic and if not then why not?
- With proper planning and stock control, I cannot see what the drone service is required at all. There is no evidence presented to suggest that the NHS is not coping now, so it appears to be a solution looking for a non-existent problem.
- There's no requirement at all to provide a drone service to Craignure or Tobermory given the frequency of ferries between Oban and Craignure.

Response 3: Argyll Aero Club

From: [REDACTED]
Sent: 01 February 2021 08:22
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: ACP2020-099 UAS BVLOS in Segregated Airspace (Oban-Isle of Mull-Coll)

Hi [REDACTED]

Thank you for taking the time to share your feedback on behalf of Argyll Aero Club, really appreciate it.

We also fully agree in integration rather than segregation, and believe this to be the CAA medium/long term plan. Currently we have to operate within the rules which state, until UAS can comply with the requirements for flight in non-segregated airspace, BVLOS UAS flights outside permanently established segregated airspace may be accommodated through the establishment of segregated airspace on a temporary basis. We are working with the CAA in their sandbox on a separate project to explore this however this ACP is in response to the current pandemic.

Thank you once again for your comments and kind regards,

[REDACTED]

From: [REDACTED]
Sent: 31 January 2021 18:15
To: [REDACTED]
Subject: Re: ACP2020-099 UAS BVLOS in Segregated Airspace (Oban-Isle of Mull-Coll)

Hello [REDACTED]

Response to ACP2020-099 UAS BVLOS in Segregated Airspace (Oban-Isle of Mull-Coll)
from
ARGYLL AERO CLUB
Oban Airport

Thank you for this inclusion on Skyports latest proposals but we are surprised that we have not been consulted in previous proposals and trials. The Argyll Aero Club (AAC) is based at Oban Airport and has been in existence on the site for over 25 years. We currently have 14 aircraft and 22 members on our club list and are involved in VFR recreational flying in the local area and beyond. At present we do not undertake flying training but we have several instructors within our membership and it is possible that we may undertake flying instruction in the future.

Our concern with your plans is not primarily the proof of concept trials you are undertaking but how any regular approved service will integrate permanently with the local VFR GA flying community.

We understand that the current trial proposals are to be operated under TDA's which will be NOTAM activated and we see that there have been several welcome changes to operational heights and routes from previous trials and proposals. While the current Covid crisis is a perfectly legitimate reason to try new delivery systems that would assist health authorities etc it would be naive for anyone to assume the Skyports proposals are entirely altruistic and in reality they should be viewed as a commercial venture and therefore regulated in that light. Any commercial flying operation whether public transport or aerial work must be assessed in relation to the safety of passengers of the service, other airspace users and the public on the ground. With the current proposed UAS there are no passengers so the next risk consideration is primarily integration with other airspace users. The fact that the trials are currently taking place under TDA's must indicate that they are considered to have a serious risk of conflict with other airspace users.

While recent past and present trials will obviously provide valuable information to the operation of the UAS it will provide no genuine indication as to how the UAS will integrate with the local VFR flying community because there is practically no current GA flying activity due to Covid lockdown restrictions and this has been the situation for nearly the last year. Having been an active GA flyer on the west coast for over 35 years I can testify that there are literally thousands of GA aircraft use the local airspace at all levels, during all weathers and seasons every year.

Unfortunately, there are well established VFR low level routes that seem to be exactly the same ones that your trials (possibly to become operational routes) will also use and any conclusions about future integration with VFR recreational GA traffic, based on the present Covid lockdown activity, will give a false and misleading picture. If UAS services are to safely become a part of regular commercial aviation on the west coast of Scotland then every effort must be made to ensure all current established airspace uses and users are given realistic consideration in a non Covid lockdown scenario.

I trust that you will take this letter as a constructive attempt to enable future UAS operations are to be undertaken safely and with the co-operation of the local VFR flying GA community.

Best regards,

[Redacted]

[Redacted]

Argyll Aero Club

[Redacted]

[Redacted]

or

[Redacted]

From: [Redacted]
Sent: Thursday, January 28, 2021 7:23 PM
Cc: [Redacted]
Subject: ACP2020-099 UAS BVLOS in Segregated Airspace (Oban-Isle of Mull-Coll)

Good evening,

Your details have been passed on to me by a fellow aviation stakeholder (apologies if I have been in touch already). I have now included you in our list of stakeholders and will ensure any future communications regarding this Airspace Change request are shared with you.

Please find attached the latest stakeholder engagement material v3 in relation to Airspace Change Proposal ACP-2020-099; appendix C details principal issues and proposed solutions since this process began.

The reminder cover email send out today is also included below. If you need any additional time to digest this material that is no problem, please just let me know. Thank you.

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]
[Redacted]

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[Redacted]
[Redacted]

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Response 4: Association of Remotely Piloted Aircraft Systems (ARPAS UK)

From: [REDACTED]
Sent: 14 January 2021 21:35
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Airspace Change ACP-2020-099 UAS BVLOS in Segregated Airspace (Oban-Isle of Mull-Coll) – Targeted Aviation Stakeholder Engagement

[REDACTED]
Thank you for your response and support, this is greatly appreciated.

Kind regards,
[REDACTED]

From: [REDACTED]
Sent: 14 January 2021 19:04
To: [REDACTED]
Cc: [REDACTED]
Subject: Re: Airspace Change ACP-2020-099 UAS BVLOS in Segregated Airspace (Oban-Isle of Mull-Coll) – Targeted Aviation Stakeholder Engagement

Dear [REDACTED]

Thank you for sharing the details of ACP-2020-099 (Oban-Isle of Mull-Coll). This response is on behalf of ARPAS UK and our members. We fully support your application for this Temporary Danger Area. Initiatives of this sort are not only beneficial for the development of BVLOS operations, but also have a use case that is of great value supporting the NHS and efforts to assist in managing COVID 19. As the UAS trade association we fully support your proposal in every respect.

kind regards

[REDACTED]
[REDACTED]
[REDACTED]
ARPAS-UK
www.arpas.uk
Twitter: @ARPASUK
LinkedIn: ARPAS-UK
[REDACTED]



On 11 Jan 2021, at 07:32, [REDACTED]

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]
[REDACTED]

skyports.net

<image001.png>

Response 5: Aviation Trading Services Ltd

From: [REDACTED]
Sent: 31 January 2021 16:00
To: [REDACTED]
Cc: [REDACTED]
Subject: Re: 'ACP- 2020-099 UAS BVLOS in Segregated Airspace (Oban-Isle of Mull-Coll)

Many thanks for this [REDACTED]
I am pleased that you have been able to reduce the top of the Danger area airspace that you require plus other amendments to the original.
On the issue of ADSB out , there has been a relatively poor take up of the CAA offer of £125 towards the cost of equipment for GA aircraft.
Anecdotally , many pilots are concerned about the punitive way the CAA have been dealing with the infringement issue. Guilty until proven innocent.
Many vertical infringements being caused by old and inaccurate Encoders . Horizontal by WGS84 versus radar plots significant errors at times.
Hopefully UAVs and GA can live in the same part of the sky...Just as it was when I was flying commercially in Afghanistan a few years ago.
Kind regards,
[REDACTED]

On Sun, 31 Jan 2021 at 14:29, [REDACTED] wrote:

Hi [REDACTED]

Thank you for your attached response. I have attached the latest version of the stakeholder engagement material and now added you to our list of stakeholders. FYI Appendix C states the principle issues and proposed solutions to date (based on feedback from stakeholders).

Appendix C, Issue 4 and 5 (copied below), hopefully answer your queries. You can also reply by email if easier with any further concerns.

Issue 4: Communicating with Skyports

Summary

- Will there be a means of communicating with Skyports to request entry to an active TDA?

Skyports response

- Should private aircraft wish to have access to an active TDA for any reason, phone numbers of the Skyports Flight Operations Team will be available on the relevant NOTAM, which can be called to request entry to that active TDA. If the SUA is airborne or likely to be airborne during the time when the request is made, then the request will be denied; however, if there are no SUA flights taking place or expected to take place during the time for which the request is made, then access is likely to be approved.
- If contacting Skyports by phone is not possible, Skyports will explore with Oban Information and Scottish Information about the provision of a Danger Area Activity Information Service (DAAIS) to enable private aircraft en route to contact Skyports to request access. See Issue 5 for more information.

Issue 5: Procedures to cooperate with air traffic services

Summary

- Do you have any procedures to cooperate with air traffic services in case of, for example, an emergency where an aircraft may need to cross the danger area?
- Skyports will discuss with Oban Information and Scottish Information the provision of a DAAIS to cover the area of operations, which will enable aircraft en-route to be able to contact Skyports and to be reminded of any active TDAs in the area. Skyports will discuss with Oban Information and Scottish Information sharing of our up and down times so that if a private aircraft were to accidentally enter or make an emergency entry into an active TDA, Oban Information or Scottish Information would be able to confirm via radio whether a Skyports SUA was in flight or not.
- It is worth noting that the Skyports SUA will be fitted with ADS-B IN and OUT and will therefore be visible to private pilots on their navigation system. Skyports will also be able to monitor the location of private aircraft fitted with electronic conspicuity that are broadcasting. See Issue 8 and Figure 9 for more details about SUA electronic conspicuity capability.
- Any procedures for Skyports to cooperate with air traffic service will be confirmed with stakeholders in due course and contact details for Skyports and DAAIS will be included in the relevant NOTAM.
- Skyports will not operate if the cloud base is below 1500ft AMSL.

Kind regards,

[Redacted signature]

skyports.net



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Appendix B: Response form

Name	[REDACTED]
Organisation name	AVIATION TRADING SERVICES LTD
Position in the organisation	[REDACTED]
Email	[REDACTED]

Feedback

I am planning a trip to Scotland for business purposes in spring 2021.

The trip will be VFR.

I will be calling at OBAN airfield with GLENTWASSA as my alternate.

Please ensure I get plenty of notice ie more than 24 HRS before you close these airfields to me.

Will I be able to talk to the drone 'pilot' by VHF radio if the weather requires that I divert from my planned route?

Regards

[REDACTED]

Response 6: Babcock International Group (Police and Charity Air Ambulance)

From: [REDACTED]
Sent: 31 January 2021 08:08
To: [REDACTED]
Cc: [REDACTED]
[REDACTED]
[REDACTED]
Subject: RE: ACP-2020-099 Skyports Oban-Mull-Coll Stakeholder Engagement Reminder & Update

Dear [REDACTED]

Thank you for your response to ACP-2020-099, we are glad this is acceptable to Air Ambulance and Police Scotland. Absolutely we will be adhering to the mutually agreed TOI and I'll be in touch again this week to share the latest version (with accurate contact numbers etc).

Kind regards,
[REDACTED]

From: [REDACTED]
Sent: 30 January 2021 12:47
To: [REDACTED]
Cc: [REDACTED]
Subject: Re: ACP-2020-099 Skyports Oban-Mull-Coll Stakeholder Engagement Reminder & Update

Dear [REDACTED]

On behalf of Babcock MCS Onshore, I can report that ACP-2020-099 is acceptable to our Air Ambulance and Police Scotland operations on the proviso that you continue to acknowledge our primacy in this airspace and that the communications measures we agreed in Section 5.2 of TOI-2020-10-05 to facilitate our entry to the TDAs remain extant. Your 1500ft cloud base limit is particularly welcomed so our transits of the area will be unimpeded, but we must remain mindful of our occasional need for access to our fuel bowser at the Lorn & Islands Hospital helipad, and the potential (albeit remote) for the need to respond to a task within a TDA.

Best regards,

[REDACTED]

[REDACTED]
UK Aviation | Aviation
[REDACTED]
[REDACTED]
[REDACTED]

www.babcockinternational.com

babcock[™]

 Please consider the environment before printing this email

From: [REDACTED]
Sent: 31 January 2021 13:13
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: ACP-2020-099 Skyports Oban-Mull-Coll Stakeholder Engagement Reminder & Update

Hi [REDACTED]

Thank you for this, much appreciate. Absolutely you are now added to the list.

Kind regards,
[REDACTED]

From: [REDACTED]
Sent: 30 January 2021 20:14
To: [REDACTED]
Cc: [REDACTED]
Subject: Re: ACP-2020-099 Skyports Oban-Mull-Coll Stakeholder Engagement Reminder & Update

Dear [REDACTED]

I would also concur with the response as detailed below from [REDACTED]

However, I would ask that I be included in any future correspondence regarding any future proposals from Skyports, as I have not been included in the consultation process for this particular proposed ACP.

Regards,

[REDACTED]

[REDACTED]
[REDACTED]
Mission Critical Services Onshore [Aviation]
[REDACTED]

Response 7: British Balloon and Airship Club

From: [REDACTED]
Sent: 27 January 2021 15:36
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Version 2 ACP-2020-099 Oban-Mull-Coll Targeted Aviation StakeholderEngagement Material

Hi [REDACTED]

Your response has been noted, thank you. Just to confirm this is in relation to ACP-2020-099, as no one at Skyports is called [REDACTED] believe.

Kind regards,

[REDACTED]

From: [REDACTED]
Sent: 27 January 2021 15:33
To: [REDACTED]
Subject: RE: Version 2 ACP-2020-099 Oban-Mull-Coll Targeted Aviation StakeholderEngagement Material

[REDACTED]

I do not have any issues over the proposed TDA. It will not adversely affect the local balloonists.

Regards

[REDACTED]
[REDACTED]

British Balloon and Airship Club.

Sent from [Mail](#) for Windows 10

From: [REDACTED]
Sent: 22 January 2021 13:54
Subject: Version 2 ACP-2020-099 Oban-Mull-Coll Targeted Aviation StakeholderEngagement Material

Response 8: British Gliding Association (BGA)

From: [REDACTED]
Sent: 12 January 2021 12:15
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Airspace Change ACP-2020-099 UAS BVLOS in Segregated Airspace (Oban-Isle of Mull-Coll) – Targeted Aviation Stakeholder Engagement

[REDACTED]

Thank you for your response and support. Absolutely, if there are any issues in the future don't hesitate to get in touch.

Kind regards,

[REDACTED]
[REDACTED]
skyports.net



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From: [REDACTED]
Sent: 11 January 2021 15:22
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Airspace Change ACP-2020-099 UAS BVLOS in Segregated Airspace (Oban-Isle of Mull-Coll) – Targeted Aviation Stakeholder Engagement

Thanks for your engagement.

The BGA has no comment to make on the specific detail of the consultation.

We would like to note that as time goes on, we would like to reserve the right to come back to this in the highly unlikely event of problems being encountered in the longer term.

Kind regards

[REDACTED]
British Gliding Association

From: [REDACTED]
Sent: 11 January 2021 07:47
To: [REDACTED]

Response 9: British Helicopter Association (BHA)

From: [REDACTED]
Sent: 07 February 2021 13:26
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: ACP-2020-099 Skyports Oban-Mull-Coll Stakeholder Engagement Reminder & Update

Hi [REDACTED]

To update you on the visibility point, this is now 1500m.

Kind regards,
[REDACTED]

From: [REDACTED]
Sent: 29 January 2021 12:33
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: ACP-2020-099 Skyports Oban-Mull-Coll Stakeholder Engagement Reminder & Update

Hi [REDACTED]

On the visibility point we operate to the manufacturer limitation which I believe is currently 500m, all operations are within our TDA only of course. Appreciate any suggestions you may have and understand the challenges with CFIT and the visual scan, which is why we are limited to our TDAs. Appendix C Issue 6 goes into more detail on ADS-B, I have extract below.

Issue 6: Aircraft Avoidance

Summary

• *What is your procedure for avoidance if another aircraft is detected in close proximity to yours, or accidentally enters TDA by accident or in an emergency?*

Skyports response

• *The UAS will constantly review the speed and heading of other aircraft in the situational awareness catchment area. If the system anticipates that another aircraft will breach the pre-set drone Well Clear (WC) Boundary, the system will automatically decide to respond sufficiently early so as to avoid any actual breach, assuming the other aircraft maintains their current speed and heading. The system is dependent on the other aircraft carrying ADS-B and broadcasting out.*

• *While the UAS offers this collision avoidance capability, Skyports is unable to rely on this system as a complete strategic air risk mitigation solution with regards to current UAS regulations, hence the regulatory requirement to operate within segregated airspace.*

Kind regards,
[REDACTED]

From: [REDACTED]
Sent: 28 January 2021 22:35
To: [REDACTED]
Subject: RE: ACP-2020-099 Skyports Oban-Mull-Coll Stakeholder Engagement Reminder & Update

[REDACTED]

Thank you for the update. I am glad to see that you will cease ops when the cloud base is less than 1500ft. Have you considered also ceasing your ops when the inflight visibility drops below a certain limit. ADSB and other forms of electronic conspicuity give pilots an indication of where to focus their scan to spot conflicting traffic. The final part of the 'see and avoid' technique features the human's mark I eyeball which is notoriously unreliable. In poor weather enough time is spent looking out to avoid CFIT, time sharing to look in the monitor ADSB displays and then look out trying to spot your UAV will cause all tasks to be done in a less efficient way and to a lower standard.

Yours

[REDACTED]

From: [REDACTED]
Sent: 28 January 2021 16:45
Subject: ACP-2020-099 Skyports Oban-Mull-Coll Stakeholder Engagement Reminder & Update

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]

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Response 10: Cheshire Flyers

From: [REDACTED]
Sent: 31 January 2021 09:36
To: [REDACTED]
Subject: RE: ACP-2020-099 Skyports Oban-Mull-Coll Stakeholder Engagement Reminder & Update

[REDACTED]
Thanks for your positive responses to the concerns of other airspace users.

Your feedback and experience could be used to develop a best practice guide to applicants for TDAs to speed up process and help to engender the co-operation between airspace users that will carry forward into full integration when "see and avoid" technology has been established.....and approved by the regulator.

Best regards
[REDACTED]

Sent from [Mail](#) for Windows 10

From: [REDACTED]
Sent: Thursday, January 28, 2021 4:32 PM
Subject: ACP-2020-099 Skyports Oban-Mull-Coll Stakeholder Engagement Reminder & Update

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?nID=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]
[REDACTED]
skyports.net



From: [REDACTED]
Sent: 22 January 2021 18:36
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: ACP-2020-099 UAS BVLOS in Segregated Airspace (Oban-Isle of Mull-Coll)
Attachments: ACP-2020-099 Skyports - Oban-Mull-Coll - Targeted Av Stakeholder Eng Material v2.0.pdf

Dear [REDACTED]

Thank you for taking the time to detail all your concerns regarding this ACP. I have attached the latest stakeholder engagement material for this ACP (ACP-2020-099), which was sent out today (including revisions based on current stakeholder feedback which aligns with yours) and now included you in our list of stakeholders and will ensure any future communications regarding this ACP are shared with you.

I hope this answers the majority of your concerns, if not please do get back to us. We fully agree in integration rather than segregation, and believe this to be the CAA medium/long term plan. Currently we have to operate within the rules which state, until UAS can comply with the requirements for flight in non-segregated airspace, BVLOS UAS flights outside permanently established segregated airspace may be accommodated through the establishment of segregated airspace on a temporary basis.

I also share the cover email below, please note the deadline has been extended to **31 January 2021**.

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 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.

Kind regards,



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From: [REDACTED]
Sent: 22 January 2021 16:09
To: [REDACTED]
Cc: [REDACTED]
Subject: ACP-2020-099 UAS BVLOS in Segregated Airspace (Oban-Isle of Mull-Coll)

Dear [REDACTED]
Please find our response to the consultation below:

ACP-2020-099 UAS BVLOS in Segregated Airspace (Oban-Isle of Mull-Coll)

[REDACTED]
Cheshire Flyers
[REDACTED]
[REDACTED]

The Cheshire Flyers is one of the largest active microlight and light aircraft flying clubs in the UK with a membership of around 150.

The Western Isles are an extremely popular destination for our members, as it is for many other flyers in the UK, and there is huge concern about this proposal and how it will impact on accessibility to the area. Flights tend to take place during periods of settled weather. During such a period, restriction of light aircraft access to airfields in the affected area, particularly Glenforsa, will impact on the safety of GA flights, reduce visitor numbers and negatively impact on the local economies.

We are, therefore, against the proposal in its current form.

The main issues are the duration of TDA activation times, which we feel should be confined to the minimum requirement for flight of the small unmanned aircraft (SUAs) and it is unacceptable that a TDA should hinder use of Glenforsa airfield. Skyports state that through Vodafone 4G and satellite links, the SUAs are in continuous data contact with base. This means that SUA locations and flight timings will be known precisely. It is also understood that the SUAs will carry a transponder and will therefore be visible to suitably equipped GA aircraft.

The proposed application of the unmanned aircraft technology is laudable but we believe that the implementation could be more inclusive without jeopardizing SUA and GA activities or causing potentially hazardous conflicts. The trial should be focusing on safe integration of airspace users in uncontrolled airspace rather than attempting unsustainable segregation.

The urgency of establishing support for NHS services in the Oban-Mull-Coll area is recognized and this could be achieved with a solution that better considers the needs of other airspace users and makes better use of the available technology. Unless, a mutually acceptable solution that minimises airspace competition can be developed for this location, broader use of commercial SUAs elsewhere could be problematic.

Response 11: Connel Flying Club

ACP-2020-099 Oban-Mull-Coll

Name	[REDACTED]
Organisation	Connel Flying Club
Position in the organisation	On behalf of elected officers & members
Email	[REDACTED]

Feedback

Regretfully, we cannot support this proposal. At the same time, we do not oppose it.

We recommend that you withdraw the ACP and resubmit it with greater clarity and better proposals for integration with other airspace users.

We set out the reasons why we cannot support the proposal below. We hope that these are taken in the spirit of constructive criticism and look forward to your responses.

Connel Flying Club represents around 20 members, with 12 aircraft based at Oban Airport (almost half of the total number of aircraft based there). Before 2020, our members flew approximately 400 hours a year, with a majority of their flights transiting the affected areas. Whilst most of our flights take place at higher altitudes, our members do regularly fly at lower levels.

Apart from our specific objections to this proposal, we believe it is possible for our members to operate in cooperation with you without segregated airspace. We are willing to work with you further on this.

Flight safety

The proposal, as published, negatively affects the safety of our members.

The routes along the Sound of Mull (approximately Tobermory to Oban) and the Firth of Lorn (approximately from Bunessan to Oban) are subject to extremely variable weather. Unforecast low cloud is common and flights at low level are sometimes necessary to return safely to Oban or alternate landing sites.

Your offer to suspend operations when the cloud base is below 1500ft is noted. However, the windy.com data is not sufficient for this as it relies on cloud base forecasts which are very unreliable in this area. Actual weather observations would be needed for this to be sufficient mitigation - and they would need to be made at different points along the route in order to be useful. We are happy to discuss local weather conditions further.

We note your suggestion that telephone contact and a DAAIS operated by Oban Information would be sufficient mitigation, but we must strongly disagree. For most GA aircraft, telephone calls are impossible in flight. Weather conditions can change substantially during

the course of a flight, so it is not sufficient to have a telephone conversation prior to departure. Due to the local terrain, Oban Information is uncontactable north of Craignure (up the sound of Mull), and west of Lochbuie (on the south coast of Mull).

If segregated airspace is required, a DAACS with Scottish Information, combined with a DAAIS with Oban, would provide some mitigation.

Activation periods

If segregated airspace is required, it should be activated for the minimum amount of time necessary, and there must be a mechanism for other airspace users to establish whether or not it is active whilst they are airborne. The existing DAACS/DAAIS offered for the military danger areas on the west coast of Scotland would be a good example to follow. There is no firm commitment to this in the current proposal.

We recognise that there is a requirement to publish a NOTAM 24 hours in advance and that due to operational constraints you are unable to commit in advance to short time windows in which you will be airborne. This only makes the provision of a working DAACS/DAAIS more important.

Consultation issues

We note that none of the three flying clubs based at Oban Airport, nor Skye Flying Club based at Broadford Aerodrome to the north, were included on the initial list of stakeholders. Additionally, the operators of Tiree Airport (Highlands & Islands Airports) and proprietors of two private airstrips in the vicinity (Kilfinichen on Mull and Conaglen on the mainland) seem to have been omitted. These are significant gaps.

We also note that we were not consulted for the previous two ACPs in the area. All of this suggests that no attempt was made to contact the local GA community, which is at best a material oversight.

We only became aware of the proposal through social media. After contacting you directly, we received a revised proposal on the 22nd of January and a further revision on the 28th of January, yet the deadline for responses is the 31st of January. This is clearly insufficient by any standards.

We are disappointed by the lack of operational detail in the proposal: What are the flight profiles? What are the criteria on which the "testing and demonstration" will be judged? If more information were included, we would be able to engage more constructively to find solutions that work for everyone.

We note and are grateful for your informal engagement during the consultation period.

We would be happy to respond to a definitive proposal with sufficient time allowed for review.

Route/navigation complexity

The proposed airspace is complex and almost impossible to avoid using visual navigation techniques. As a result, pilots will need to avoid a significantly larger volume of airspace than that specified. The effective impact is that the entirety of the Sound of Mull and Firth of Lorne will be blocked to GA traffic at low altitude.

Summary

We believe that the planned activities can be carried out safely and with a minimal impact on other airspace users, but the proposal in its current form is not proportionate and is not in keeping with the principle of flexible use of airspace. Furthermore, the consultation has been insufficient.

From: [REDACTED]
Sent: 21 January 2021 13:45
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Oban-Mull-Coll trial - questions - Oban/Connel Flying Club

Good Afternoon [REDACTED]

Wondering if you would have some time today maybe later this afternoon/evening to give us feedback on some of the changes we are trying to make? Alternatively tomorrow morning could work?

Many thanks,
[REDACTED]

From: [REDACTED]
Sent: 18 January 2021 15:14
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Oban-Mull-Coll trial - questions - Oban/Connel Flying Club

Hi [REDACTED]

Good to meet you on the call today and thanks for all the useful input. Some points below from the call:

- You are the main representative for Connell Flying Club.
- There is a transmitter on the Isle of Tiree for VHF comms.
- Using Oban/Scottish Information to make other airspace users aware of drone status (airborne/grounded) on request, would be useful to the GA community. We will look into this suggestion, thank you.
- We spoke about the software requirements required to display active NOTAMS. You mentioned you had a colleague who maybe able to share specific software requirements with us?
- The LAA have good aviation stakeholder outreach. Moving forward we plan to explore the most effective communications channels and this stakeholder engagement has brought our attention to other means (local newspapers and magazines etc), which we intend to look into in the future.

Look forward to catching up with you after we send out our revisions this week.

Thank you for taking the time to speak with us.

Kind regards,
[REDACTED]

From: [REDACTED]
Sent: 14 January 2021 21:31
To: [REDACTED]
Cc: [REDACTED]
Subject: Re: Oban-Mull-Coll trial - questions - Oban/Connel Flying Club

That would be great, thank you.

[REDACTED]

On Thu, 14 Jan 2021, 21:30 [REDACTED] wrote:

Hi [REDACTED]

Absolutely, would 1330pm on Monday work for you? I will send a teams/zoom invite if that would work?

Kind regards,

[REDACTED]

From: [REDACTED]
Sent: 14 January 2021 17:15
To: [REDACTED]
Cc: [REDACTED]
Subject: Re: Oban-Mull-Coll trial - questions - Oban/Connel Flying Club

Hi [REDACTED]

Thanks for those details - that's really helpful.

How about a quick call on Monday afternoon? Right now, my diary is free from 1pm onwards.

Many thanks,

[REDACTED]

On Wed, 13 Jan 2021, 11:58 [REDACTED] wrote:

Dear [REDACTED]

Thank you for your email and feedback, it is really helpful and very constructive. It is terrific that you see value and support this service.

I have some time this week if you would like to talk further about this however I have tried to answer your questions below to the best of my knowledge in conjunction with our Head of Technology:

- *I understand your aircraft both emit and receive ADS-B signals. Can you confirm whether your receivers process uncertified ADS-B signals - ie with SIL/SID=0? Most of the aircraft based at Oban emit uncertified ADS-B.*

We have contacted the drone manufacturer and they have confirmed that this is the case; uncertified ADS-B signals are processed by our receivers.

- *What is your procedure for avoidance if another aircraft is detected in close proximity to yours?. This would of course only happen in the case of an accidental or emergency breach of the danger area, but its not impossible.*

The system is constantly reviewing speed and heading of other aircraft in the situational awareness catchment area. If the system anticipates that another aircraft will breach the drone Well Clear (WC) Boundary, the system will decide to respond sufficiently early so as to avoid any actual breach, assuming the other aircraft remains maintains their current speed and heading. Table 1-3 and 1-4 outline the response relative to the type of leg being flown at the time.

- *Do you have any procedures to cooperate with air traffic services in case of, for example, an emergency where an aircraft may need to cross the danger area? In our formal response, we will suggest having pre-agreed procedures with Oban Airport, Scottish Control/Scottish Information, and local flying clubs.*

We have tried to keep our TDA operating altitudes as low as possible to allow airspace users to fly over them, however in the event that you need to cross our TDA (in an emergency/generally in poor/low cloud base scenarios) our contact number will be published on the NOTAM detailing which TDAs are active and when. It will be beneficial if we can have as much notice as possible to coordinate this if possible.

We are also in close contact with Scottish Information and Oban Airport in case you need emergency access and they will be able to contact us should you already be airborne. A separate deconfliction temporary operating instruction (TOI) is in place for the HEMS operators in case they need access to these locations.

- *What plans and procedures do you have in place to deconflict with traffic at Glenforsa Airfield on Mull? The currently proposed airspace conflicts with the established visual circuit at Glenforsa. In our formal response, we will probably suggest moving the centreline of the danger area over to the eastern coast of the Sound of Mull, to give as much space as possible between your operations and the Glenforsa visual circuit.*

Thank you for this feedback. We are in contact with the stakeholder who runs this airfield and plan to re-route away from this pending his feedback. Based on his feedback and that of the other airspace users (including yourself) we will suggest an amended the route which will hopefully give you access to this airfield without the need to contact us. Your suggestion of moving the TDA towards the Sound of Mull has been noted. I would hope to have this new proposal prepared next week however any further input on this from yourself would be much appreciated, we are open to all suggestions.

- The shape of the restricted airspace is quite complex, and it is not practical for pilots to avoid it solely using "visual" navigation. Are you able to work with organisations such as eg Skydemon to ensure that the restrictions are clearly visible on GPS navigation devices?

The TDA design currently shows the whole route network. Only one or two specific TDA routes will be active at any given time, all the other TDAs will be deactivated when not required, to ensure all other airspace users can have access. Our Head of Technology informs me that as long as you have an ADS-B IN connection, it will be picked up by Sky-demon. We can also provide you with KML files that you can upload in your navigation software if that would be an acceptable solution.

- Very happy to have a further conversation on the phone about this - outside the narrow scope of the ACP we are supportive of your efforts and would like to work with you to develop mitigations and operating procedures to smooth things along.

It would be great to arrange a call to introduce ourselves and help us all understand each others airspace requirements. When would be convenient for you?

Kind regards,

[REDACTED]
[REDACTED]

skyports.net

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From: [REDACTED]
Sent: 12 January 2021 12:22

To: [REDACTED]

Subject: Oban-Mull-Coll trial - questions - Oban/Connel Flying Club

Hello,

Just for good order, this is not a formal ACP response - I'm in the process of preparing that and have a few questions in advance.

I represent Connel Flying Club, based at Oban airport. As a group, we are probably the largest users of the affected airspace (we have about a dozen aircraft flying out of Oban, flying a total of approx 400 hours a year, and at a guess about 2/3rds of our flights cross the affected areas, although mostly at higher altitudes). As we live locally we also see the real value in the service, and so we're keen to engage constructively.

I understand your aircraft both emit and receive ADS-B signals. Can you confirm whether your receivers process uncertified ADS-B signals - ie with SIL/SID=0? Most of the aircraft based at Oban emit uncertified ADS-B.

What is your procedure for avoidance if another aircraft is detected in close proximity to yours?. This would of course only happen in the case of an accidental or emergency breach of the danger area, but its not impossible. If our pilots know how your aircraft will react, that will help them.

Do you have any procedures to cooperate with air traffic services in case of, for example, an emergency where an aircraft may need to cross the danger area? In our formal response, we will suggest having pre-agreed procedures with Oban Airport, Scottish Control/Scottish Information, and local flying clubs.

What plans and procedures do you have in place to deconflict with traffic at Glenforsa Airfield on Mull? The currently proposed airspace conflicts with the established visual circuit at Glenforsa. In our formal response, we will probably suggest moving the centreline of the danger area over to the eastern coast of the Sound of Mull, to give as much space as possible between your operations and the Glenforsa visual circuit.

The shape of the restricted airspace is quite complex, and it is not practical for pilots to avoid it solely using "visual" navigation. Are you able to work with organisations such as eg Skydemon to ensure that the restrictions are clearly visible on GPS navigation devices?

Very happy to have a further conversation on the phone about this - outside the narrow scope of the ACP we are supportive of your efforts and would like to work with you to develop mitigations and operating procedures to smooth things along.

Kind Regards,

[REDACTED]

Response 12: Cormack Aircraft Services Ltd

From: [REDACTED]
Sent: 06 February 2021 17:10
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: ACP 2020-099 response

Hi again [REDACTED]

In answer to your questions:

If we receive reports that the cloud base has deteriorated to <1500ft after the drone has become airborne, the remote pilot will either command the drone to return to base or continue to destination, whichever is the quickest. Our system gives constant estimated times to destination/departure/alternate which will allow the remote pilot to make the safest decision. There will of course be some element of airmanship involved, especially depending on where ADS-B traffic (if any) might be located.

Any dangerous good carried (only blood samples) will be in accordance with CAA approved procedures and permissions.

Kind regards,
[REDACTED]

From: [REDACTED]
Sent: 05 February 2021 10:18
To: [REDACTED]
Cc: [REDACTED]
Subject: ACP 2020-099 response

Please confirm receipt

Good evening,

Thanks for extending the return date.

Please find attached response to the ACP 2020-099

Kind regards,

[REDACTED]
[REDACTED]
Cormack Aircraft Services Ltd.
[REDACTED]
[REDACTED]
[REDACTED]

Web www.cormackaircraft.com
[REDACTED]
[REDACTED]

Appendix B: Response Form

Name: [REDACTED]
Organisation name: Cormack Aircraft Services Limited
Position in the organisation: [REDACTED]
Email: [REDACTED]

Feedback

Thank you for the opportunity to respond to ACP2020-099 for which we raise an objection based on the following grounds.

We have a part SPO & DTO, and have been flying in the area since 1966. We write to object to the ACP as proposed as we consider it to be dangerous. The reason for our concern is that many light and commercial aircraft use the proposed routes for low level transits between the mainland and the Islands. When the cloudbase is below 2000ft, it is impossible to use any other route by Visual Flight Rules other than those shown in all of the ACP route combinations. In addition, the upper limits of 750ft AMSL are likely to conflict with the aforementioned traffic. Further, the width the proposed routes appear to take over a vast area which will preclude any other traffic. It is clear that Skyport's inherent lack of engagement with GA stakeholders in Scotland has painted a wholly inaccurate picture and contributed to a poor grasp of airspace use in the affected area of the ACP.

It is by chance that a fellow operator advised me of this airspace change proposal which is fortunate as I had never been consulted. A call round various general aviation contacts yesterday revealed that no one had heard of this proposal. Now we have found that there have been previous ACPs for which limited consultation has been undertaken. To this end we would request we be consulted on any future airspace change proposals. We note that this proposal is to assist the NHS so would not object to this lightly.

I am concerned about the control of any restricted airspace and the operation of the drone.

As an ex-Air Ambulance pilot, I have routed through the Sound of Mull on many occasions where the weather has changed instantly with lowering cloud and reduced visibility with the possibility of ice formation on the airframe. As the drones would be carrying dangerous goods, I am concerned what would happen in the event of icing or substantially deteriorating weather conditions. In addition, it is impossible to make contact with Scottish Information by VHF in the Sound of Mull and from the east coast of Mull across to Lochgilphead, whilst flying at low level. I do not accept that we could easily communicate. It is not possible to communicate by telephone whilst flying. Where terrain allows VHF coverage, one can call Scottish Information or Oban. Please note that the majority of light aircraft do not have ADS-B in/out so the electronic conspicuity is of limited use. Rather than discuss the possibility, I would request that the sponsor be mandated to do so. While I note that the UAS will not operate if the cloudbase is below 1500ft AMSL, how will the drone be able to detect if this decreases dramatically en-route? If a report is received of deteriorating weather after launch, will the drone automatically return to base?

I would also ask if the drone operator and indeed the drone itself has been approved for the carriage of dangerous goods. As per the CAA approval process for carriage of dangerous goods, an operator must conform to specific guidelines as well as nominating accountable persons. I would assume this applies to transport of dangerous goods by UAS also?

Once again I thank you for the opportunity to comment on the airspace change and as mentioned would ask that we be included in any further consultations.

Response 13: Double Whisky Flying Group

From: [REDACTED]
Sent: 31 January 2021 07:59
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: ACP-2020-099 UAS BVLOS in Segregated Airspace (Oban-Isle of Mull-Coll) - Formal Stakeholder Objection

Dear [REDACTED]

Thank you for taking the time to detail all your concerns regarding this ACP, your objection has been noted. I have now also included you in our list of stakeholders and will ensure any future communications regarding this ACP are shared with you.

Kind regards,

[REDACTED]
[REDACTED]
skyports.net



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From: [REDACTED]
Sent: 30 January 2021 00:15
To: [REDACTED]
Cc: [REDACTED]
Subject: ACP-2020-099 UAS BVLOS in Segregated Airspace (Oban-Isle of Mull-Coll) - Formal Stakeholder Objection

Dear Sirs,

I am writing to formally object to your ACP submission regarding the establishment of Segregated Airspace at title. I have seen the updated version 3.0 of your consultation document (dated 29 January 2021) and the comments below are based on this document.

1. STAKEHOLDER INFORMATION

I am a co-owner and operator of a light aircraft group based in Scotland which regularly flies under Visual Flight Rules (VFR) within the proposed airspace and will be potentially affected to our detriment under the current proposal. Our aircraft is normally based at Fife Airport during the Winter months and at Prestwick Airport from Spring to Autumn. Additionally the aircraft is registered for operations with the Argyll Flying Club based at Oban Airport. Typically the aircraft will fly for 100-120 hours per annum, although due to lockdown restrictions during 2020 this was reduced to 70 hours. In spite of the lockdown restrictions which pertained for much of the year, the aircraft flew from Oban on 9 separate occasions and from Glenforsa (Mull) on 11 separate occasions. These numbers would be in the order of half the normal operations which we would expect to carry out during an unconstrained flying year. There is therefore a reasonable expectation that the proposed Segregated Airspace may at times conflict with our planned operations resulting in myself and the Group being de facto local Stakeholders.

2. FLYING GROUP POSITION ON UAS BVLOS OPERATIONS

It is recognized by the Group that UAS technology is not only here to stay but will continue to develop and grow with various operational applications which will benefit our community. However, this needs to evolve in a manner which embraces the basic tenets of the UK and EASA Airspace Policy, namely that airspace is to be shared in an equitable and flexible manner and that airspace users shall integrate rather than segregate. Segregation not only impacts adversely on other airspace users but also introduces the thin edge of the wedge by creating precedent for widescale applications and thus leading to expectations of such airspace being granted for other users, which would result in an uneven burden on those who also have to use the airspace for military, commercial, and general aviation purposes. The objection is therefore not to the principle of BVLOS, but as is detailed below, it is to the timeline of this application, the consultation methodology, and the aspects of the manner in which the airspace is planned to be operated. Changes to these aspects of the Proposal, which address the issues satisfactorily, could lead to a reverse in the objection position.

3. ACP PROPOSAL STAKEHOLDERS

The ACP has the potential to affect a great many users ranging from the military low flying training community, through essential emergency services, to commercial operations and finally to the many General Aviation aircraft based in Scotland and beyond who operate in the West Coast of Scotland airspace environment. The ACP sponsor details the stakeholder methodology used in previous trial ACPs in Para 3 of the current proposal. There appears to be a perception by the Sponsor that by engaging in a limited target audience, which barely targets the majority users likely to be using the airspace, i.e. General Aviation, then they have somehow built up a comprehensive knowledge of the airspace, it's users, and their operations. This is wide of the mark.

Examining the CAA Airspace Policy Portal, the following can be found:

ACP-2020-023 UAS BVLOS (Oban) – This was withdrawn and there is no documentation to show the stakeholders consulted (assuming it got to that stage).

ACP- 2020-038 UAS BVLOS (Oban-Craignure) – The Sponsor stakeholder engagement strategy was based on consulting operators and operations within 10 miles of the proposed TDA. This meant that stakeholders did not include any of the Scottish Flying Clubs or aircraft group operators who use this airspace regularly, nor did it include any of the umbrella organisations who represent the interests of aircraft owners and operators such as the Light Aircraft Association (LAA) or the Aircraft Owners & Pilots Association (AOPA), who could have ensured that the proposal was widely known about and open to comment by their members who fly in the area and have a vested interest in a safe operation. In spite of this omission of a great number of stakeholders, this lead to a claim that a comprehensive picture of airspace usage in the

area had been formed. I would argue against that and suggest that the Sponsor 'got away with it' in terms of the General Aviation community due to the lack of consultation coupled with pilots not generally flying in the area as much due to COVID restrictions on travel and flight, therefore being blissfully aware of the trial taking place.

ACP-2020-055 UAS BVLOS (Craignure – Oban – Lochgilphead) – As there is no sight of the ACP proposal on the CAA Portal, only meeting minutes, etc, it cannot be determined who the stakeholders engaged are/were. It is logical however to presume that the same flawed logic used in ACP-2020-038 was used, since no one I have talked to in General Aviation circle and networks, nor Air Traffic Service providers such as NATS have heard about it. Once again a large proportion of the actual users of the airspace, who incidentally may not necessarily be operating from Oban or Glenforsa aerodromes, have been excluded from forming an opinion and making suggestions for equitable use of the airspace.

ACP-2020-048 UAS BVLOS (Greenock – Bute) – I am also led to believe that a further ACP was proposed which would affect General Aviation traffic in the Firth of Clyde area drastically, but can find no information on this proposal in the CAA Portal. It would be interesting to have seen, had it been continued, as to who would have been on the stakeholder list.

Turning now to the stakeholders on this ACP-2020-099, it is an improvement on what has gone on before and I believe this is in no small part due to those in the General Aviation world 'spreading the word' and making sure that our voice can be heard. That said, there are many interested parties that appear to be missing from the stakeholder list, but they are being encouraged to make comment on the proposal through the various General Aviation networks and media coverage. I certainly hope so, in order to provide a truly comprehensive airspace usage picture for both the Sponsor and the CAA to base decisions on.

4. ACP PROPOSAL CONSULTATION TIMESCALES

When first made aware of this ACP around 2 weeks ago, it raised an immediate concern with me about not only the breadth of the stakeholder audience but a woefully inadequate consultation timescale of 2 weeks (which was in reality only going to be 1 week for me). This has been extended to 3 weeks, but still well short of the normal timescales expected for changes such as this. As already mentioned, it is pleasing that the umbrella aviation organisations are included in this engagement, however the vast majority of them are not 'local' and would require input and suggestions from their locally based members or from members further afield with experience of operating in the affected airspace. In these times of COVID, the Tier lockdowns, and 'working from home' directives, giving these organisations the responsibility of consulting with their members, drafting an agreed response to you, and filing their return – all within 3 weeks of asking – is quite frankly ludicrous and could be seen as a cynical ploy to slip in this change under the radar before airspace users can react and respond. The CAA Policy for the ACP process and for the establishment of TDAs normally has generous consultation and implementation lead times. They are there for a reason, to ensure that the views of all stakeholders and airspace users have the ability to be aired and addressed. Whilst the current COVID pandemic no doubt gives Sponsor the impetus to move quickly with a trial, not least because of EU and Government funding aspects I'm sure, the proposed start date of April 2021 indicates that this is not 'life or death' situation which requires short cutting of due process and protocols. Playing the COVID card whilst it has already been established that the trial can commence a few months down the line seems to be a red herring. If there is already 2 months lead in time from now then an adequate extension which allows adequate time for full consultation with not only local but all relevant stakeholders is surely not in the realms of the impossible.

5. AIRSPACE PROPOSAL

The objections to the proposal on airspace and procedure terms are many. I will deal with them in the order they appear within the proposal document.

Para 1

I am not entirely clear as to what the objective of the trial is, in other words, what is it providing that moves forward the integration of UAS BVLOS and manned aircraft ? The technology for operating BVLOS UAS without Detect and Avoid is already established. The equipment to be used in the trial is, as I understand, an off the shelf product and proven already throughout the world. The use of TDAs in segregating airspace is also a tried and tested method of operation. Accepting a trial, or if the Sponsor had their way, multiple trials all along the West Coast of Scotland, has the potential to help create a patchwork of TDAs across the UK. These cannot be accepted by the established aviation community as it will lead to an unsustainable situation with other users being squeezed out unsafely. More Segregated Airspace is not only going against the future concepts for airspace usage but also introduces the risk of infringements by other aircraft and in to conflict with BVLOS UAS which are inadequately equipped for Detect and Avoid. The worst case is a mid-air collision with all the ramifications that holds. Whilst safety has to be the number 1 priority, more and more Segregated Airspace also reduces drastically the efficiency of the airspace, resulting in large numbers of airspace users being limited in their access and constraining their operations and freedoms. Why are you not pursuing trials using equipment which has Detect and Avoid technology onboard , with a view to gathering data to assist in the removal of the need for Segregated Airspace ?

Para 1.2

It states that the possibility of airspace infringements will be considered as part of any approval. What mitigations can you provide against unknown aircraft infringing an established TDA ? In Class G airspace there is no requirement for aircraft to carry Electronic Conspicuity equipment, therefore how are you going to know they are there and have entered as they are most likely going to be beyond your line of sight too ? This worries me.

Para 4.2

From the top down view it is difficult to gauge the width of the corridors. Of note, the corridor in the vicinity of Glenforsa seems to have been much reduced to take account of the airfield, which is welcome. Presuming that the drone has the accuracy to navigate within that narrow corridor and the safety argument for their operation is met, then do the other corridors need to be as wide as depicted, notwithstanding the constrained route argument ? What prevents any turnback required being accommodated by slowing and bringing the drone to a hover, reversing direction, and then accelerating again to cruise speed ? Reducing the airspace to the bare minimum would not only be in keeping with CAA policy but would also reduce the impact on other airspace users and be easier to gain acceptance in the wider aviation community.

For background information on why this trial may impact on General Aviation aircraft operating in the airspace unfavorably, the TDA structure is within airspace which is regularly used by General Aviation aircraft flying up the West Coast either on round trip flights from out with the local area, accessing local airfields such as Oban or Glenforsa, or transiting to other airfields in the Highlands and Islands regions. The weather conditions on the West Coast of Scotland can best be described as unpredictable and unchangeable. High terrain, both on the Isle of Mull and on the Mainland can produce quickly changing local weather conditions such as orographic cloud and reduced visibility, whilst the coastal areas can also develop quick moving areas of patchy coastal fog. Whilst pilots will check meteorological information

before flight, these local conditions and speed of change can be unforecast and may require the pilot to deviate from his planned flight profile, either laterally to avoid terrain, (visible or otherwise) or vertically to avoid observed cloud. The wide over sea channels between the islands and the mainland offer pilots a potentially safe escape route in such circumstances as terrain is no longer a factor and they can descend to a low level to remain clear of cloud. Legally this could be close to the surface, provided that 500' minimum separation distance is maintained from any person, vehicle, building or structure. Where conditions allow pilots will also hug the coast both for navigational and contingency purposes in the event of an engine failure. Whilst airborne, the ability to contact the TDA operator to request entry in to Segregated Airspace, even in an emergency, will be virtually impossible. Infringement may be the only option for the pilot and this will be unknown to the TDA operator unless the UAS has the ability to electronically carry out Detect and Avoid procedures. The other side of the coin of course is that a pilot in trouble may be reticent to enter the TDA and enter weather conditions which they should avoid. Should the TDA be seen as the way forward then it is imperative that it is as small as possible both laterally and vertically, it is only promulgated when it is being used, that maximum activity lengths set for each activated block on a rolling basis taking account of the progress of the drone are part of the approval by the CAA, and a robust method of ensuring tactical access by other users in both normal and emergency operations is in place at all times when it is being used.

Para 4.4

It mentions a 24 hour NOTAM lead in. Whilst this is laudable in giving a lot of notice, it will also mean that the periods of activity are likely to be long as the granularity of operations 24 hours beforehand will not be as precise as those closer in to actual UAS operations. It is more likely that the Sponsor is going to ask for potentially excessive operation to allow for unplanned delays to operations and for accommodating pop up tasks than simply limit a 24 hour prenote to precise short term flight windows. It's understandable but also potentially results in airspace being blocked for long periods when it is not actually being used, in direct contradiction with the Flexible Use of Airspace concept. If there are going to be lengthy periods where promulgated activity is not actually going to take place then there must be mechanisms for tactically opening up the TDA to other users and also for cancelling activity as soon as any activity is complete or has been cancelled. The Sponsor and the CAA should collate regular stats on actual usage and booked usage and any excess blocking of airspace immediately dealt with during the trial. I also note that Appendix C Issue 2 covers some of these points.

Para 6.1

This does not cater for General Aviation aircraft who wish to access the airspace in an emergency or for normal operations on account of weather conditions or tactical entry when drone activity permits. This is discriminatory and goes against the principle that airspace is shared by all users. Where would any Temporary Operating Instruction be issued and how would users not in the local clique know about it and where to find it ? I believe it should be published by the CAA as an Aeronautical Information Circular so that ALL users are aware of any trial information and the procedures associated with it which they may elect to use if required.

Appendix C Issue 4

Whilst some aircraft will be able to ask for entry clearance in advance and in sufficient time, this is dependent upon radio coverage from Oban (which has limited hours and radio range) and will also be in an area of well known poor radio coverage from Scottish Information due to terrain shielding. It is also dependent on the ATC facility having the capacity to try and contact Skyports when they perhaps have higher priority tasks to undertake. In other words the chance of success is realistically low.

Appendix C Issue 5

As issue 4 in terms of radio coverage. It also states that aircraft will be able to contact Skyports via Scottish Information or Oban. How will this be achieved ? There is no ability for either agency to 'patch through' a radio call to a telephone call.

Appendix C Issue 6

This only addresses detection and collision avoidance in respect of ADS-B equipped aircraft. It provides no mitigation against non-equipped aircraft who are not legally required to be fitted with this.

Appendix C Issue 8

I note that drone will operate in VMC conditions. How will this be determined if the drone is down route and BVLOS ?

Happy to engage as required.

Yours aye

[Redacted Signature]

Double Whisky Flying Group



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Response 14: East of Scotland Microlights

From: [REDACTED]
Sent: 25 January 2021 15:20
To: [REDACTED]
Subject: Re: West coast drone airspace proposal

Hello [REDACTED]

Thanks for getting back to me so quickly. I'll take a bit of time to read through and digest everything, and forward details to our club members.

Kind regards

[REDACTED]
East of Scotland Microlights.

On Mon, 25 Jan 2021 at 13:11, [REDACTED]

Good afternoon [REDACTED]

Absolutely, I have attached the latest stakeholder engagement material for this ACP (ACP-2020-099), which was sent out last Friday (including revisions based on current stakeholder feedback) and now included you in our list of stakeholders and will ensure any future communications regarding this ACP are shared with you. I hope this answers the majority of your concerns, if not please do get back to us.

I also share the cover email below, please note the deadline has been extended to **31 January 2021**.

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) which 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?plD=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 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.

Kind regards,

[Redacted signature]

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From: [Redacted]
Sent: 25 January 2021 11:58
To: [Redacted]
Subject: West coast drone airspace proposal

Good morning,

I am writing on behalf of our microlight flying school and club at East Fortune airfield, East Lothian.

We have been established for over 30 years and have the largest flexwing club and fleet in the country with over 50 aircraft based here.

I have only just been made aware of proposals regarding drone flying and restricted airspace in the Mull, Coll and Oban areas. These are areas that many of our members use frequently and therefore of great significance to us.

Could you please add us to your list of interested parties, together with details of the proposal, so that we can circulate the details to our club membership for their feedback?

Regards



East of Scotland Microlights.

Response 15: East of Scotland Strut

From: [REDACTED]
Sent: 31 January 2021 12:46
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Subject: Skyports ACP - UAS BVLOS in Segregated Airspace (Oban, Mull, Coll)

Dear [REDACTED]

Thank you for your response on behalf of East of Scotland Strut LAA, I appreciate you gathering this feedback so quickly and we also appreciate your support. I have been replying to any stakeholders who have contacted me directly as well, and if you feel you need some more time please let me know. I can compile any additional comment by Thursday evening if that helps. You have made some great points and I am more than happy to have an informal call post engagement to discuss them further if you like.

On your points below I have tried to answer them as best as possible:

- This proposal is a short term service to the NHS arising from the pandemic. Any longer term requirement will be subject to a new proposal. Your point about any future consultations being national has also been noted and we would happily have an informal conversation about this with you post engagement (to get your ideas on this).
- On the Raptors point we are liaising closely with Scottish National Heritage and sharing our routes with them to ensure there is minimal disruption.
- We are currently in discussions with NATS to have a DAAIS service with Oban & Scottish Information for GA.
- We can't speak specifically to details of the NHS supply chain as this is based on confidential discussions, however I can provide some general comments on your questions. The NHS supply chain in the Argyll & Bute region is quite varied with different modes of transport used depending on the specific medical facility such as vans, ferries, planes and Royal Mail pickup – often a combination of multiple of these. In addition other factors such as: time of year, time at which sample was taken, service levels of the transport provider, presence of COVID restrictions etc. impact on the overall time from sample taken to results being provided back.
- On the size of TDA point the unconstrained leg provides enough horizontal room for the drone to turn or perform an orbit plus an additional safety buffer.
The VTOL (Vertical Take-off & Landing) capability is reserved to only support take-off and landing, not to support manoeuvres during flight. It runs on a separate battery system than the battery system uses for forward flight in fixed-wing mode for safety reasons and has been designed to support normal take-offs, aborted take-offs and any other scenario that would require it to hover for a certain amount of time in order to land safely again (e.g. an emergency landing). The system is not designed by the manufacturer for use during forward flight apart from facilitating an emergency landing.

The constrained leg design functionality was designed by the manufacturer to enable the drone to fly below 400ft through mountainous regions. This functionality enables us to plot a route that stays well clear from other aircraft without running the risk of an orbit or RTH being triggered and the drone hitting a mountain ridge as it is making a turn. Working with the OEM, we've worked out a means of introducing a constrained leg, which is actually safer even if it does limit our options, for the following reasons:

- When using a constrained leg, we cannot execute an orbit in the event of the ADS-B picking up the presence of another aircraft should one enter segregated airspace.
- By operating within a constrained leg we take up as little space as possible. The SUA has a small corridor that it will navigate through but will automatically trigger an emergency land if it determines that it has breached that corridor.

Hopefully this explains why the whole route cannot be a constrained leg.

If anything else comes to mind don't hesitate to get in touch.

Kind regards,

[REDACTED]

From: [REDACTED]
Sent: 30 January 2021 18:26
To: [REDACTED]
Cc: [REDACTED]
Subject: FW: Subject: Skyports ACP - UAS BVLOS in Segregated Airspace (Oban, Mull, Coll)

From: [REDACTED]
Sent: 30 January 2021 15:30
To: [REDACTED]
Subject: Subject: Skyports ACP - UAS BVLOS in Segregated Airspace (Oban, Mull, Coll)

Sir,

We have just heard of your airspace intentions, anecdotally, three days before the deadline to put in comments or objections. This is odd as you say you have engaged with likely stake holders and we are one of the most likely groups to be affected by changes to low level airspace in the area of Oban and Mull. The East of Scotland Strut of the LAA has 13 aeroplanes and 20 pilots and we consider this corner of Scotland as being part of our home territory, shared with others in our community.

We have absolutely no objection to emergency use of the airspace for Covid reasons. However, we would strongly object if this was an attempt to claim airspace in the long term without a proper national consultation. Any permanent network planned for the future will be national within the British Isles and as such will need national consultation to fit into an as yet un-discussed national framework. We would like reassurance that this proposal is as altruistic in a time of crisis as you suggest and not an opportunity to seize airspace by subterfuge to set a precedent that is difficult to undo.

Our members have responded almost by return email and I have provided a summary their comments below.

- 1 If this is good for these NHS sites then they must be equally good for all NHS sites across Britain. If there is going to be a national network linking tens of thousands of sites in an interlocking web this must be agreed on a national level involving all interested parties.
- 2 We know that Skysports Ltd. is engaged in all sorts of drone development. This involves setting up and testing and trialling commercial deliveries to pave the way for millions of destinations. This should be considered as a whole and not in a hurry during lockdown.
- 3 We strongly believe that this is not the time rush through important airspace changes on the minor context of Covid-19. Once the full extent of what will be required spread across the whole of Britain for all parties to be aware of before any decision is made.
- 4 There is no mention of noise at all. Drones buzzing up and down the beautiful scenery there with their lights flashing does not help the tranquility of these places.
- 5 The prosed corridor is enormous considering the size of a drone and its capability for accurate flight paths.
- 6 Developing it incrementally may give a false impression of what is going to happen.
- 7 Raptors have been trained to capture drones illegally operating round airfields. How will these drones be protected from the raptors found in remote areas? What has been done to prevent harm or death to raptors defending their territory?
- 8 The GA fleet is not required to have an ADSB capability. They cannot rely on conspicuity if only they have it.

- 9 The NHS and the Police have the Skywatch service which can provide a volunteer light aircraft at short notice. This would allow a full load of around 100lbs and a more reliable service. Fifty times the load capacity of your drone.
- 10 The proposed lanes cover Oban airfield. Yet they will not be able to be contacted by radio, effectively meaning we have to phone them every time we want to go that way. One can't have controlled airspace that has no radio contact. It is like sealing off a swathe of Scotland. How do we descend into Oban which would be penetrating their airspace (as outlined).

As you see a lot of unanswered questions and there is not enough time in your schedule to allow for proper discussion.

This could well be the thin end of a considerable wedge.

We are more than happy to see the drones assisting the NHS for the period of the pandemic but seek assurances that these arrangements are indeed temporary for the stated period.

Please add us to the Stakeholders list.

Kind Regards

[REDACTED]

[REDACTED] East of Scotland Strut of the L.A.A.

Response 16: Freedom Aviation

From: [REDACTED]
Sent: 01 February 2021 08:36
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: ACP-2020-099 UAS BVLOS in Segregated Airspace (Oban-Isle of Mull-Coll)

Hi again,

Forgot to mention that I have added you both (Anthony & Dave) to our list of stakeholders under Freedom Aviation, so any future communications regarding this ACP are shared with you. Is this ok?

Kind regards,
[REDACTED]

From: [REDACTED]
Sent: 01 February 2021 08:31
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: ACP-2020-099 UAS BVLOS in Segregated Airspace (Oban-Isle of Mull-Coll)

Dear [REDACTED]

Thank you for your email and taking the time to share your feedback and suggestions. I can confirm receipt of your response as Head of Training for Freedom Aviation.

Kind regards,
[REDACTED]

From: [REDACTED]
Sent: 31 January 2021 18:24
To: [REDACTED]
Cc: [REDACTED]
Subject: ACP-2020-099 UAS BVLOS in Segregated Airspace (Oban-Isle of Mull-Coll)

Dear [REDACTED]

Sent on behalf [REDACTED] Freedom Aviation

I wish to formally object to Airspace Change Proposal ACP-2020-099. In my capacity as Head of Training of a UK ATO (Freedom Aviation [REDACTED]) I have identified the following concerns.

1. The CAA's Policy for the Establishment of Permanent and Temporary Danger Areas (ref. 20200721) 7.2 requires "the notified dimensions of a permanent DA are to be the minimum practicably necessary to meet the task for which the DA has been established". It is clear that the extensive network of air corridors, approximately 75nm which ring fence Oban & Mull from the east, do not meet this requirement.
2. The same policy requires the need "to avoid over-complication of airspace structures". ACP-2020-099 consists of 11 TDAs with differing dimensions and notifications creating a fragmented hotch-potch of airspace which is inconsistent with CAA policy.
3. Both issues 1 & 2 are compounded by the submission of multiple similar ACP applications: ACP-2020-055A & ACP-2020-048.

4. The TDA policy requires stakeholder engagement. I understand that local stakeholders were initially unaware of these ACP proposals and have engaged through chance. Furthermore, the ACP sponsor wishes to truncate the consultation period to avoid overburdening stakeholders which is disingenuous in light of this fact.
5. Compounding issue 4 is that stakeholder engagement must be broadened beyond the local aviation community: aviation is a long distance endeavour where training in this region is carried out by operators UK-wide. Furthermore, such operators bring much broader benefits to the local economy, in particular in the hospitality sector. As training restarts post-COVID restrictions, these benefits are likely to be more important to the local economy than ever and thus should be consulted.
6. The CAA's policy requires that environmental considerations must be taken into account (2.3). ACP-2020-099 makes it clear that dangerous goods are to be carried: what environmental risk mitigants have been taken, in particular with reference to the IATA dangerous goods regulations? This application has not been made transparent in the ACP process.
7. As is made clear in the policy, the CAA is compelled to act with regard to the efficient use of airspace. According to disclosures, the drone in question is capable of carrying a 3kg payload. This is neither proportionate to the number nor extent of the multiple ACPs. Furthermore, whilst the ACP describes a time saving vs land transport, there is no comparison to other alternates such as the air charter service offered by Hebridean Air Services whose Islander aircraft are capable of both STOL operation, carry payloads circa 1t and do not require dedicated airspace in which to operate.

It is important to emphasise that this ACP is a commercial one. This has already been established in both the assessment minutes (16/12/2020 , item 2) and in the ACP statement of need (Skyports note this ACP is required in order to maintain their funding). This is in contrast to the bulk of the application which makes reference to COVID & the NHS. Such statement are not relevant to the application, and are at best improperly balanced by alternatives and at worst are disingenuous given issue 7 identified above.

It is also important to establish that I represent a commercial endeavour, Freedom Aviation, which operates out of airfields in both England & Scotland. My company offers pilots both ab-initio and advanced training, of which the operation of aircraft safely at lower levels is a critical part. However, like similar training organisations, I require no dedicated airspace to continue operations whilst bringing important and established benefits to the local economy at this time of need in the hospitality sector. This application directly threatens the viability of this activity.

Yours Sincerely

████████████████████
████████████████████

████████████████████

cc. Civil Aviation Authority

████████████████████ Freedom Aviation

Response 17: Gama Aviation (Scottish Air Ambulance)

From: [REDACTED]
Sent: 03 February 2021 12:33
To: [REDACTED]
Subject: Re: ACP-2020-099 Skyports Oban-Mull-Coll Stakeholder Engagement Reminder & Update

Good afternoon [REDACTED]

I have read through ACP-2020-099 and I am happy with all the measures you have put in place to minimize the impact on our operation.

If there is anything else I can help with please feel free to contact me.

Kind regards,

[REDACTED]

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Gama Aviation 

[REDACTED]

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VAT Registration Number: GB 945 7326 96

From: [REDACTED]
Sent: Thursday, January 28, 2021 4:44:41 PM
Subject: ACP-2020-099 Skyports Oban-Mull-Coll Stakeholder Engagement Reminder & Update

Good Afternoon,

Thank you to all those aviation stakeholders who have already responded in relation to ACP-2020-099, your

Response 18: General Aviation Alliance (GAA)

Hi [REDACTED]

Thank you for sending your response on behalf of the GAA, I can confirm it has now been received and your objection is noted.

In answer to your question, NOTAMS will be deactivated when no longer required.

Kind regards,

[REDACTED]

From: [REDACTED]
Sent: 01 February 2021 00:00
To: [REDACTED]
Cc: [REDACTED]
Subject: ACP-2020-099 UAS BVLOS in Segregated Airspace (Oban-Isle of Mull-Coll)

Hi [REDACTED]

This email can be taken as the GAA's response to ACP-2020-099 (<https://airspacechange.caa.co.uk/PublicProposalArea?plD=330>), replacing all previous correspondence. It is based upon the information available to us at this time. Please confirm that it will be considered as a valid input to the Stakeholder Engagement and passed to the CAA as part of the CAP1616 process that is being followed?

The GAA (www.gaalliance.org.uk) is an independent group and partnership of organisations representing, as far as possible, UK General Aviation (GA), and Sports and Recreational Aviation interests (S&RA). Its objective is to promote and protect the cost-effective use of GA and S&RA aircraft, and their owners, pilots and the associated operations, and to actively participate in the formulation of regulations and actions that may affect their interests so as to ensure the welfare and the free and safe movement of these aircraft, pilots, owners and the associated operations. By using the GAA as a consultee you can be sure that an appropriate person within all of the following organisations will be kept informed of the progress of your ACP and thereby reach the vast majority of UK GA operations:

BBAC - British Balloon and Airship Club
BGA - British Gliding Association
BHPA - British Hang Gliding and Para Gliding Association
BMAA - British Microlight Aircraft Association
BMFA - British Model Flying Association
BPA - British Parachute Association
HCGB - Helicopter Club of Great Britain
LAA - Light Aircraft Association
PPL/IR Europe - European Association of Instrument Rated Private Pilots
RAeC - Royal Aero Club of the United Kingdom

The individual organisations may choose to also submit their own responses directly to you.

It could be said that the GAA's interest in drone TDAs is far more detailed than it needs to be for what are short term limited impact events. However it must be remembered that these are trials for evolving activities and it is incumbent upon us to ensure that outputs from these trials do not include inappropriate precedents. One key element of our concern is as expressed in the CAA's Policy for Permanently Established Danger Areas and Temporary Danger Areas, paragraph 2.3, "The vertical and lateral dimensions and the operating hours of a notified DA/TDA shall be the minimum practicable necessary to enable the tasks to be undertaken within it, subject to the need to avoid over-

complication of airspace structures and any environmental considerations." It is unfortunate but experience has shown that we need to have detailed knowledge about the TDA sponsor's proposals to be able to have faith that they are meeting this.

1. The consultation process

1.1 There have been significant changes of detail in a very short space of time, with the last change dated 28Jan2020 being a few days prior to the close of the engagement.

1.2 It is regrettable that the first engagement document did not contain a much more developed proposal

1.3 It is regrettable that the proposals have not been plotted on a CAA VFR 1:500,000 or 1:250,000 chart as this would have made assimilation of the details considerably easier.

1.4 The CAP1616 portal has not been kept up to date.

1.5 We consider the overall time allowed for the consultation to have been insufficient

1.6 The initial list of Stakeholders was missing significant operators

1.7 We had our doubts about the statement and the reasoning behind it, "... Skyports developed a comprehensive picture of airspace usage in that area." which were unfortunately proven to be well founded as it proved to be very far an accurate position.

1.8 If there is such an "urgent imperative to support the NHS in Scotland COVID 19 response." why has it taken so long for this ACP to be processed since the original trial?

On 18Jan2021 we submitted a series of questions in order to be able to make a reasoned meaningful response. We have only had a partial response to these questions.

1.9 We appreciate that Skyports has made a number of changes but we still do not have sufficient information upon which to make a reasoned meaningful opinion. Therefore we currently can only object to the proposal.

2. The lateral dimensions

2.1 The change to the lateral dimensions around Glenforsa has revealed that the acceptable buffer either side of the drone's flight path to be in the order of 300m and yet the other corridors, although their width does vary, are considerably wider at over 2000m. The reason given is that the drone needs to be able to execute a 180 degree turn within the TDA and its associated buffers. We cannot believe that the drone has a turn radius of over 600m and therefore we believe that the lateral boundaries have been set contrary to the CAA's Policy for Permanently Established Danger Areas and Temporary Danger Areas, paragraph 2.3.

2.2 As the drone is a quad-copter the volumes at the various destinations also look to be excessive.

3. Vertical dimensions

3.1 We do not know the operating altitudes or heights and buffers and so have been prevented from reaching a meaningful reasoned opinion.

3. Timings

3.1 The proposal is for "Daylight hours and outside of daylight hours", we presume that this is a slightly weird way of saying day and night operations as these are the only choices in aviation legislation.

3.2 We have no information about the length of the flights, the time buffers proposed, the speed of the drones, etc., and so are not able to reach a reasoned meaningful opinion.

4. DACS/DAAIS

4.1 We welcome the indication that there will be some sort of a DAAIS service available, but the details are vague to the extent that we are unable to reach a meaningful opinion.

4.2 It is our preference is for a DACS to be available

4.3 The Designated Operational Coverage for Oban ATC unit is insufficient

4.4 We believe that regardless of the point above Oban ATC does not have sufficient coverage to meet the espoused service

5. Notification of activity

5.1 We welcome the commitment that there will be at least 24 hours between a NOTAM being published and the TDA going live.

5.2 Due to the potential for interactions with pilots from outwith the local area it is essential that an AIC is published in advance of the first activation NOTAM containing sufficient information for visiting pilots to operate safely and as flexibly as possible. The AIC needs to be referred to in every NOTAM.

5.3 Following on from point 3.2 above, it is important that a TDA is not activated when there is no activity likely imminently.

5.4 Please confirm that as soon as a NOTAMed activation is no longer needed the NOTAM will be cancelled?

5.5 Due to how the NOTAM system interacts with various moving map and NOTAM plotting systems that pilots use we requested that a separate NOTAM to be published for each day's activity. Windracers responded that, "We think that daily publication might lead to the spurious idea that an activity has a shorter duration or that would only happen for one day." This demonstrates an unfortunate lack of knowledge, or misinterpretation as to how the NOTAM system works and we maintain that it is important that each NOTAM is limited to one day's activity. It will also be less prone to errors when an individual day's activity needs to be cancelled for whatever reason.

Regards

[REDACTED]

[REDACTED]

General Aviation Alliance

Email: [REDACTED]

Response 19: Glenforsa Airfield

of Mull-Coll) - Targeted Aviation Stakeholder Engagement

Good Morning [REDACTED]

It was a pleasure to speak to you yesterday, thank you for responding to the ACP-2020-099. Below are the highlights of our conversation:

- I summarised the main points of the Targeted Aviation Stakeholder engagement document explaining that this is a trial operation for up to 5 weeks commencing on 8 April 2021 to transport medical equipment, medical samples (including dangerous goods in the form of blood samples) and medicine by small unmanned aircraft (SUA) to and from multiple healthcare facilities in Oban, Isle of Mull and Coll on the west coast of Scotland.
- You explained how your airfield is contained within the proposed Tobermory-Craignure TDA section and with the current proposal could affect arriving and departing traffic into Glenforsa Airfield. The proposed TDA height in this section are currently from 0ft to 450 ft. You also explained this to be a very popular GA community location from April onwards with an annual event occurring on the 25th May which can have up to 130 aircraft.
- I explained how only one specific route will be flown on a particular day with flight crew deployed at either location and that only the TDA's required for that route will be activate. All other TDA's will be deactivated when not required to ensure airspace is accessible to all users. NOTAMS will be created 24hrs before intended drone operation which will state the active TDAs and intended operation times (daylight hours).

In addition to the above we spoke about specific solutions to yourself that you would be open to:

- We can both work together to find a route around this section that could avoid your airfield, I remember you had some suggestions and would appreciate if you can share these given your knowledge of the area. I'll then take this back to the team and see what is feasible.
- We can share our intended operation location (route) directly with you the day before we are due to operate. This is beyond the NOTAM that will be published.
- Skyports have a Unmanned Traffic Management (UTM) platform which will allow you to monitor our drone position for additional visibility which we would be willing to share.
- At this stage it is difficult to predict the frequency and duration this specific route will be used (it may only be a few days over the 5 weeks) however we are open to you calling us anytime you have arriving/departing traffic into your airfield that could be affected by the drone, in which case we would ground our drone during that period.

I hope I have captured these details accurately and please do get in touch to further discuss if you have any queries. If you like I can arrange a further call with my colleague Jef who can talk you through the UTM monitoring system.

In relation to the other things we discussed regarding use of your hotel etc, I shall send a separate email.

Kind regards,

[REDACTED]
[REDACTED]

[skyports.net](https://www.skyports.net)

From: [REDACTED]
Sent: 11 January 2021 08:49
To: [REDACTED]
Subject: RE: Airspace Change ACP-2020-099 UAS BVLOS in Segregated Airspace (Oban-Isle of Mull-Coll) - Targeted Aviation Stakeholder Engagement

Hi [REDACTED]

Yes, a call anytime will do.

Cheers

[REDACTED]

From: [REDACTED]
Sent: 11 January 2021 08:47
To: [REDACTED]
Subject: RE: Airspace Change ACP-2020-099 UAS BVLOS in Segregated Airspace (Oban-Isle of Mull-Coll) - Targeted Aviation Stakeholder Engagement

Hi [REDACTED]

Absolutely, would today work? I can call you on your mobile or arrange a zoom call any time after 11am today.

Kind regards,

[REDACTED]
[REDACTED]

From: Glenforsa Hotel [REDACTED]
Sent: 11 January 2021 08:36
To: Ricky Bhargava [REDACTED]
Subject: RE: Airspace Change ACP-2020-099 UAS BVLOS in Segregated Airspace (Oban-Isle of Mull-Coll) - Targeted Aviation Stakeholder Engagement

Hi [REDACTED]

I need more information on the proposed drone operations in relation to Glenforsa Airfield.

Can we organise a telephone call to discuss?

Response 20: Grampian Microlight & Flying Club

From: [REDACTED]
Sent: 22 January 2021 15:20
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: ACP-2020-099 UAS BVLOS in segregated airspace (Oban-Isle of Mull-Coll)

Hello again [REDACTED]

Please see response below for your additional query.

Thanks for your questions.

We can't speak specifically to details of the NHS supply chain as this is based on confidential discussions, however I can provide some general comments on your questions.

As you would know, the NHS supply chain in the Argyll & Bute region is quite varied with different modes of transport used depending on the specific medical facility such as vans, ferries, planes and Royal Mail pickup – often a combination of multiple of these.

In addition other factors such as: time of year, time at which sample was taken, service levels of the transport provider, presence of COVID restrictions etc. impact on the overall time from sample taken to results being provided back.

I believe the statement you're referring to was a statement that we made referring that results could take "as much as up to 4 days". We believe this statement is true based on our consultations with your NHS colleagues at various facilities in the area. Of course not all samples take 4 days, and indeed there is a huge range of delivery times, including those where non-drone based transport is more effective than drone transport. This is why we are very targeted about where we look to implement drone delivery.

If you would like to discuss further, I'm happy to pass your details onto our NHS contact (with your permission of course) and we could have a conversation in that forum where we can share a bit more detail and get your thoughts on whether or not this service would provide any value to your medical practice.

From: [REDACTED]
Sent: 22 January 2021 14:50
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: ACP-2020-099 UAS BVLOS in segregated airspace (Oban-Isle of Mull-Coll)

Dear [REDACTED]

Thank you for taking the time to detail all your concerns regarding this ACP. I have attached the latest stakeholder engagement material for this ACP (ACP-2020-099), which was sent out today (including revisions based on current stakeholder feedback which aligns with yours) and now included you in our list of stakeholders and will ensure any future communications regarding this ACP are shared with you. Please feel free to communicate directly with myself or Simon going forward, as all feedback will be submitted to the CAA in a summary document post engagement.

I hope this answers the majority of your concerns, if not please do get back to us. I have referred your specific questions on the NHS to my colleague and will forward a response when received.

I also share the cover email below, please note the deadline has been extended to **31 January 2021**.

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) which 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?plD=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 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 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.

Kind regards,

[Redacted signature]

skyports.net



Appendix B: Response form	
Name	[REDACTED]
Organisation name	Grampian Microlight & Flying Club
Position in the organisation	[REDACTED]
Email	[REDACTED]

Feedback:

I have concerns about how this ACP process and previous ones have been carried out. Skyports say they have identified the appropriate stakeholders, but I am aware that many of the local aviation organisations such as the flying groups/clubs at Oban and surrounding areas who have only found out by word of mouth. This concern also applies to how the consultations for ACP-2020-038 and ACP-2020-55 were carried out. This surely does not constitute proper identification of stakeholders by a company based in London.

I would like to see a timeline as to where they can demonstrate the claim that tests currently can take 4 days for the results to be returned to the GPs/hospital. How much information was gathered regarding time lines, the average, median, mean and what are the factors influencing this. What proportion of the 4 days is the lab time itself and what proportion is the travel time. As a rural GP (but not remote GP) I would be interested to understand this better. You say about reducing use of antibiotics, but there already are clinical tools and protocols to follow, which do not require the results of laboratory tests to be available in order to make clinical decisions.

Oban and Glenforsa are extremely busy with GA in non-pandemic times. I am concerned that Skyports will have not had a full picture with regard to GA operations due to their curtailment during the pandemic.

April is usually prime flying time as every one gets back to aviating, especially if they have been laid up during the winter months. Even though the Glenforsa hotel may not be open, the airstrip is open independently.

As the corridors currently stand they will have a major impact on arrivals and entering the circuit at both Oban and Glenforsa as well as a safety issue due to the close proximity to the airfields.

Notification is to be by NOTAM. 24 hours is not enough time and especially if they are planning on operating Saturday/Sunday. Many aircraft travel the length of the UK over long weekends to visit Oban/Glenforsa. The short notice nature of the NOTAM is likely to cause problems with visitors to Oban/Glenforsa and if too restrictive or frequently used, may cause these aviators to go elsewhere which will have a major impact on the economy of the surrounding areas. There is no suggestion of how often or for how long these NOTAMs will last for. Therefore this will severely hamper GA operations. And earlier in the proposal you have identified the 4 day to get results of tests – how will a NOTAM in the

previous 24 hours reduce this time frame significantly enough to be useful? If a patient is that unwell a decision would require to be made before this.

There does not seem to be any suggestion that a radio channel will be utilised. And by default there would be no option then for a Danger Area Crossing Service/Danger Area Activation Information Service (DACS/DAAIS). Pilots are human and we may miss a NOTAM in our brief. What mitigations do Skyports plan on putting in place if someone strays in to their TDA to protect aircraft/drone. Nor does there seem to be any suggestion of utilising Electronic Conspicuity. The GA fleet have all been widely encouraged by the CAA to use some form of EC specifically by offering grants to purchase such devices.

Appendix B: Response form

Name	[REDACTED]
Organisation name	HILLHOUSE ESTATES LTD
Position in the organisation	[REDACTED]
Email	[REDACTED]

Feedback

To [REDACTED] [REDACTED]

I think that my name has already been added to the "Stakeholders" list which is great. I have looked at the detail and have noted that you will be restricted should the cloud base be below 1500 feet which overcame my major worry about access in poor weather. The route is sometimes the only way south and it becomes necessary to fly below 600 feet. Thank you for immediately altering your 1500 foot rule.

I imagine the entry plans for OBH airport will be published in due course. Please call at any time for further details. Will kind regards [REDACTED]

Response 22: Lanark and Lothian Soaring Club

From: [REDACTED]
Sent: 29 January 2021 11:59
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: ACP-2020-099 Skyports Oban-Mull-Coll Stakeholder Engagement Reminder & Update

Hi [REDACTED]

The link attached details the system we have on board, [ping1090 ADS-B Transceiver - uAvionix](#). I have extracted the relevant section within the document for you below.

Issue 6: Aircraft Avoidance

Summary

- What is your procedure for avoidance if another aircraft is detected in close proximity to yours, or accidentally enters TDA by accident or in an emergency?

Skyports response

- The UAS will constantly review the speed and heading of other aircraft in the situational awareness catchment area. If the system anticipates that another aircraft will breach the pre-set drone Well Clear (WC) Boundary, the system will automatically decide to respond sufficiently early so as to avoid any actual breach, assuming the other aircraft maintains their current speed and heading. The system is dependent on the other aircraft carrying ADS-B and broadcasting out.

The system is dependent on the other aircraft carrying ADS-B and broadcasting out.

- While the UAS offers this collision avoidance capability, Skyports is unable to rely on this system as a complete strategic air risk mitigation solution with regards to current UAS regulations, hence the regulatory requirement to operate within segregated airspace

Kind regards,

[REDACTED]

From: [REDACTED]
Sent: 28 January 2021 18:10
To: [REDACTED]
Subject: Re: ACP-2020-099 Skyports Oban-Mull-Coll Stakeholder Engagement Reminder & Update

Hi [REDACTED]

Thanks for the update. Just to save me wading through the data submitted could you confirm what type of electronic conspicuity devices are carried and whether the drones are able to take avoiding action autonomously. Are the devices operating at standard power or are ranges reduced due to power and antennae limitations.

Thanks

[REDACTED]

[REDACTED]

Lanark and Lothian Soaring Club

On Thu, 28 Jan 2021, 16:44 [REDACTED] wrote:

Good Afternoon,

Response 23: Light Aircraft Association (LAA)

From: [REDACTED]
Sent: 31 January 2021 13:49
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: ACP-2020-099 Skyports Oban-Mull-Coll Stakeholder Engagement Reminder & Update

Dear [REDACTED]

Thank you for your response, I confirm receipt of your attached response and objection on behalf of the LAA.

Kind regards,
[REDACTED]

From: [REDACTED]
Sent: 31 January 2021 11:04
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: ACP-2020-099 Skyports Oban-Mull-Coll Stakeholder Engagement Reminder & Update

[REDACTED]

As requested in your most recent consultation on the above ACP, please find attached in the requested proforma format, a response from the Light Aircraft Association on behalf of members both locally and those from further afield who regularly fly in the area concerned. As we have continuing significant concerns regarding this proposal, we must regretfully object to the proposal in its current form.

Best regards

[REDACTED]
[REDACTED]
Light Aircraft Association
Turweston Aerodrome
[REDACTED]

[REDACTED] www.laa.uk.com

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 **Consider the environment. Please don't print this e-mail unless you really need to.**

From: [REDACTED]
Sent: 28 January 2021 16:45
Subject: ACP-2020-099 Skyports Oban-Mull-Coll Stakeholder Engagement Reminder & Update

Good Afternoon,

Name	[REDACTED]
Organisation name	Light Aircraft Association
Position in the organisation	[REDACTED]
Email	[REDACTED]

Feedback

ACP-2020-099 Oban-Mull-Coll

We must regretfully **OBJECT** to your current proposal, based on insufficient consultation timescales of your revised proposals, the clear absence of timely contact with many important local stakeholders and an apparent absence of knowledge of, or impact assessment upon, existing GA operations in the area.

While we welcome your recent attempts to introduce mitigations in response to comments from other airspace users, these have resulted in a fragmented and confusing ACP in terms of the proposed and revised routings, as well as betraying some serious flaws in your research as to how the TDA may be implemented. We strongly recommend that Skyports withdraws the current ACP and resubmits it, in its entirety, with greater clarity and better developed proposals for its integration with existing airspace users.

In terms of consultation period, we were initially informed of your proposal on 11th January and began our review with local members and other stakeholders. We then received a second version of the proposal on 22nd January and the most recent revision to the proposal on the evening of Thursday 28th January, yet we are requested to meet a response deadline of Sunday 31st January. This is clearly inappropriate. We would be pleased to respond to a definitive proposal with associated time allowed for review.

As you will be aware, there has been significant public criticism regarding your justification for this trial as the carriage of Covid test and other medical samples in association with Argyll and Bute Social Care Partnership. It is noted that ACP-2020-038 at Craignure last year was also justified on similar grounds, with comments that ferry links had been reduced and that Mull was underserved by transport. You have since reported (Item 5 Assessment Meeting Minutes, 16th December 2020) that the previous trial was actually a proof-of-concept, with no post-engagement report or follow-up details on how many flights, what was transferred or weather limitations. A local LAA member who is also a medical practitioner has commented that there are 6 ferries a day each way Oban-Mull and a volunteer car courier service on Mull, so its practitioners are well served in terms of existing transportation.

While our objection is driven by the flight safety implications of your proposal, its potential denial of access to other legitimate airspace users and the lack of appropriate consultation, we strongly recommend that the CAA investigates the veracity of your justifications as part of their review of this proposal. If these justifications were proven to be disingenuous, it is potentially damaging to the credibility of the whole UAS industry.

It is also noted that you intend to progress your trials under the auspices of ACP-2020-055(Lochgilhead), based on its acceptance based on the 'lack of GA response' to the engagement process initiated by you last August. It is clear from our correspondence with the local aviation community that the majority were at the time unaware of this, again pointing to an inappropriate engagement strategy which I am sure you are now keen to resolve.

The Light Aircraft Association represents 7,700 members and oversees on behalf of the CAA, more than 2,600 active light aircraft on LAA-administered Permits to Fly. We speak as the largest powered sport flying body in the UK and also as a member of the GA Alliance, speaking for around 72,000 members of the flying community. We note that they have also responded in some detail and therefore will not repeat the items raised, but fully endorse their comments.

In addition, I have circulated your recent correspondence to the LAA West Scotland Strut, Highlands Strut and to the East of Scotland Strut, our three regional bodies representing members based in Scotland. Despite the claims made in your "Summary of Engagement" statements on p.11 of your proposal, few of these members were aware of the ACP before we contacted them, nor were some significant commercial operators and flying schools. I understand these local pilots, with significant experience of flying conditions in the area, are making their own submissions of which I hope you will take note and forward as part of your CAA submission. As you are aware too, tourism and summer visitors make a significant input to the local economy, many of whom fly in the area in GA aircraft. In particular these make a significant input to the viability of Oban and Glenforsa airfields and their surrounding communities. There is a general feeling that these airspace restrictions will potentially damage this industry.

The LAA considers that the UK airspace's default classification is Class G and there must be equitable access by all, including UAS operations. However we are concerned that this ACP has been prepared with little knowledge of existing GA operations in the area. This is evidenced by the subsequent plethora of changes in the third iteration of the Proposal. We welcome the proposal to move more routes over water and potentially away from Glenforsa airfield's area and schedule of operations. However we request that these included in the main body of the ACP rather in a 'response to comments' section which may not form part of the CAA's scrutiny of the proposal.

We must continue to question your proposed access arrangements, including the assumption of ADS-B carriage by all aircraft operating in the area. As a significant number of existing operators may not be carrying this equipment, this is unacceptable, and we would query the basic need to fully segregate airspace when most operations will be below 400 feet. The key to the successful integration of these activities may be an agreement and close communication with the relevant Flight Information Agencies (Oban and Scottish) to pass the information to locally operating aircraft - as with any other traffic. If necessary, we would be happy to assist in facilitating the appropriate contacts.

As stated earlier, we would be pleased to respond to a new, clearer and definitive proposal with associated time allowed for review. We would also strongly recommend that you present and illustrate your proposed routings and airspace configuration on ICAO-standard aviation charts.

[REDACTED]
[REDACTED], Light Aircraft Association
31st January 2021

Response 24: Loch Lomond Seaplanes

From: [REDACTED]
Sent: 01 February 2021 11:44
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Re. Airspace change ID : ACP-2020-099 (UAS Oban-Mull-Coll)

Dear [REDACTED]

Thanks for taking the time to provide this feedback, it is very much appreciated. If you need some additional time please let me know and I can collate any additional response by Thursday evening. I have added you to our list of stakeholders and will ensure any future communication regarding this ACP are shared with you.

Kind regards,
[REDACTED]

From: [REDACTED]
Sent: 31 January 2021 23:17
[REDACTED]@caa.co.uk
Cc: [REDACTED]
Subject: Re. Airspace change ID : ACP-2020-099 (UAS Oban-Mull-Coll)

Dear Sir/Madam,

I have only just become aware of this consultation. Please accept this last minute email in submission to the said consultation on the aforementioned airspace changes.

Unfortunately, despite flying around 1,000 commercial VFR flights, in a normal year, on the West Coast, Skyports Limited has not contacted Loch Lomond Seaplanes about its airspace proposals.

Loch Lomond Seaplanes may be impacted as some of our regular water landing areas lie within the proposed TDA airspace, for example, Oban Bay and Tobermory Bay. Our flights can be unscheduled, short notice requirements. These flights can also be delayed etc due weather.

I am extremely concerned about future TDAs blocking off VFR flights running North-South v.v. on the West side of Scotland when weather conditions close to VFR limits exist over the area. VFR aircraft use the coast routings in poor weather when the highlands are covered in cloud.

I wish to be included in any future Scottish airspace restriction consultations that you may raise.

I look forward to hearing from you.

Regards

[REDACTED]
[REDACTED] Loch Lomond Seaplanes

Response 25: Miles Airwork Ltd

From: [REDACTED]
Sent: 01 February 2021 12:39
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Objection to proposed airspace changes ACP-2020-099
Attachments: ACP-2020-099 Skyports - Oban-Mull-Coll - Targeted Av Stakeholder Eng Material v3.0.pdf

Dear [REDACTED]

Thank you for your feedback, your objection is also noted. I have added you to our list of stakeholders and included a copy of the latest stakeholder engagement material and will ensure any future communication regarding this ACP are shared with you. FYI Appendix C of the document details the principal issues and proposed solutions (based on stakeholder feedback).

Kind regards,

[REDACTED]
[REDACTED]

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From: [REDACTED]
Sent: 01 February 2021 07:07
To: [REDACTED]
Subject: FW: Objection to proposed airspace changes ACP-2020-099

From: [REDACTED]
Sent: 31 January 2021 20:10
To: [REDACTED]
Subject: Objection to proposed airspace changes ACP-2020-099

Hello,

I object to the proposed airspace changes reference ACP-2020-099 on the following grounds:

1. As a business principle, one business has no right to affect the operation or profitability of another business. If it is unavoidable then full compensation should be paid whilst the adverse activities are being conducted.
2. The airspace size and height is disproportionate to the operation of drones that are currently available.
3. Drones can fly at night, just needs approval.
4. Not all stakeholders had been contacted for a fair and meaningful discussion. It is not enough to simply put it on the CAA portal.
5. TDA's are unworkable for local private and commercial flying activities, even if they are only used part-time. What happens if an aircraft is on-route or in an emergency situation?
6. It is disingenuous to use the NHS as a reason for the proposal and limited consultation period. It is highly unlikely that Skyports had been asked to provide this service by NHS officers, without a first approach to them. It is a commercial operation, nothing more.

Regards

[REDACTED]

Miles Airwork Limited |

[REDACTED]

[REDACTED]

Response 26: Ministry of Defence (MOD)

From: [REDACTED]
Sent: 22 January 2021 14:53
To: [REDACTED]
Cc: [REDACTED]
Subject: ACP-2020-099 UAS BVLOS in Segregated Airspace (Oban-Isle of Mull-Coll)

Good Afternoon [REDACTED]

Please accept this email as the formal MOD response to your proposed TDA in the Oban – Mull – Coll area. It takes into account Version 2 of the document and the associated changes. I would appreciate it if you could redact all personal details prior to submission on the ACP Portal, happy for job role/ department information to remain for both of our audit trail purposes.

The MOD would like to thank Skyports for this engagement. The MOD have no objections to this proposal as it only has a minor impact on MOD operations.

The fact that the TDA will be activated by NOTAM, only for the timescales required, and there is a way of contacting the airspace operator, helps mitigate any issues in the event of a national security incident, or urgent operational requirement where the MOD may require access to the airspace during activation periods. It is extremely unlikely that this will be required, but it is a possibility.

Please do not hesitate to contact the undersigned if you require any further information and also to keep the MOD informed of the progress of the proposal.

Regards

[REDACTED]

[REDACTED] Defence Airspace and Air Traffic Management |

[REDACTED]

Response 27: NATS

From: [REDACTED]
Sent: 28 January 2021 15:34
To: [REDACTED]
Subject: RE: Version 2 ACP-2020-099 Oban-Mull-Coll Targeted Aviation Stakeholder Engagement Material

Appendix B: Response form

Name	[REDACTED]
Organisation name	NATS
Position in the organisation	[REDACTED]
Email	[REDACTED]

Feedback

NATS NERL has assessed the ACP as having "no impact" on its operation.

I understand that the NATS Team are working with Skyports on the possibility of providing a DAAIS during the hours of operation of the TDA

Regards

[REDACTED]



[REDACTED]



NATS PRIVATE

Response 28: Oban and the Isles Airport

From: [REDACTED]
Sent: 12 January 2021 16:12
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Airspace Change ACP-2020-099 UAS BVLOS in Segregated Airspace (Oban-Isle of Mull-Coll) – Targeted Aviation Stakeholder Engagement [OFFICIAL]

Afternoon [REDACTED]

Thank you for your response and support of the project. In answer to your questions below:

- 1) We are in touch with Mr [REDACTED] and looking at both potentially amending our route and establishing a deconfliction procedure between us for the duration of the project.
- 2) We are in touch with Air Task and are finalising a specific Temporary Operating Instruction (TOI) with them to ensure airspace deconfliction in the Coll-Mull and Oban region (any routes affecting their operation).

Regarding the social media, this has been brought to our attention and we are addressing all stakeholder concerns who have contacted us directly.

Thank you for all the feedback above and bringing our attention to this.

Kind regards,

[REDACTED]

From: [REDACTED]
Sent: 12 January 2021 11:31
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Airspace Change ACP-2020-099 UAS BVLOS in Segregated Airspace (Oban-Isle of Mull-Coll) – Targeted Aviation Stakeholder Engagement [OFFICIAL]

Classification: OFFICIAL

Good morning [REDACTED]

I have looked at the proposal and for the most part it seems fine and only have two areas of concern.

1. The routing takes the drone operation over the Glenforsa airstrip on the Isle of Mull which is popular with some GA traffic especially in the summer months and if the restrictions are lifted. These aircraft typically fly at altitudes which are at the proposed Drone height in that area. Glenforsa is managed by [REDACTED] of the Glenforsa Hotel and it does have its own Air/Ground Radio Frequency. If the route was moved north, this may be more practical for all parties.
2. The second point is the arrival on Coll. We have scheduled flights to Coll and the descent will occur shortly before landing which may bring the aircraft into close proximity with the drone operations (best to check with Hebridean Air Services on this).

I note that the proposal has been plastered over social media (I think I know from who) which has by all accounts generated lots of wild accusations. This is the unfortunate reality we have of dealing with some of the aviators that visit here. Claims of conspiracies are already circulating...

Response 29: OIC Leuchars Flying Club

From: [REDACTED]
Sent: 21 January 2021 13:53
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: 'ACP-2020-099 UAS BVLOS in Segregated Airspace (Oban-Isle of Mull-Coll)'

Hi [REDACTED]

I hope to have some additional details out this week regarding drone specification and why TDA have originally been created to be a certain size.

TDA heights and size – We have kept our routing as close to 400ft AGL where possible, as in accordance with the CAA Drone Code, drones should operate at ideally <400ft to avoid other airspace users. All altitudes depicted are AMSL and may have variations due to terrain heights. We are currently reviewing the routing and altitudes to see if they can be reduced further.

I shall be in touch again soon.

Kind regards,
[REDACTED]

From: [REDACTED]
Sent: 21 January 2021 10:02
To: [REDACTED]
Subject: FW: 'ACP-2020-099 UAS BVLOS in Segregated Airspace (Oban-Isle of Mull-Coll)'

Thanks [REDACTED]

I think the most important remark in [REDACTED] e mail to me was:

"Whilst we all know drones will play an important role in future society,"

I don't think the GA community will want to object to UAS ops in principle but we are becoming concerned about safety. One of our pilots recently came close to a large drone at 3000 ft near Dundee airport. In a subsequent conversation with another (amateur) drone operator the guy's attitude was that since he couldn't see the drone at 400ft (because he was looking at his iPad) it didn't matter if it crept up to 5000 ft !!!

I'd be interested to know a bit more about the technical spec of a modern UAS. I know they can be programmed not to operate in FRZs (since I'm occasionally ask to provide permission to allow the manufacturer to override this programme) so why can't they be programmed to maintain 200ft or another suitable height AGL or at least never to exceed a certain AMSL altitude. Also, since they must have a very accurate GPS on board in order to find the hospital landing site, why does your proposal require such a wide corridor?

[REDACTED]

[REDACTED]

From: [REDACTED]
Sent: 20 January 2021 20:33
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: 'ACP-2020-099 UAS BVLOS in Segregated Airspace (Oban-Isle of Mull-Coll)'

Hi [REDACTED]

Thank you for your feedback in relation to this airspace change. I have now included you in our list of stakeholders and will ensure any future communications regarding this ACP are shared with you.

In relation to your point about NOTAMs, this is noted and I hope to update you this week with route amendments and suggestions based on stakeholder feedback, including yours, thank you. Please also be aware that the stakeholder engagement period has been extended until 31st January 2021 (point below).

- NOTAM activation (reduced hours) – Currently NOTAMs will be issued 24hrs before any planned flights detailing which TDAs will be active and between what times and will also include a contact number for airspace users to get in touch with us. All TDAs not in use will be deactivated in ensure airspace is still available to all users. It is envisaged only one or two route will be active at any given time. Your point about reducing NOTAM activation time has also been noted, we are currently exploring this. To ensure flexibility is given to support the NHS during this pandemic we would potentially need to be available on the day for a given TDA (given hospital ad-hoc demands and opening hours), however we are trying to explore ways to reduce this.
- The current stakeholder engagement period was due to end on Sunday 24th January 2021 but we have decided to extend the deadline by a full week to Sunday **31st January 2021**. The amended change timeline has been reviewed and approved by the CAA and can be found on the airspace change portal for this change - <https://airspacechange.caa.co.uk/PublicProposalArea?plD=330>

Kind regards,

[REDACTED]
[REDACTED]

skyports.net



From: [REDACTED]
Sent: 20 January 2021 11:58
To: [REDACTED]
Cc: [REDACTED]
Subject: 'ACP-2020-099 UAS BVLOS in Segregated Airspace (Oban-Isle of Mull-Coll)'.

[REDACTED]

I am replying as [REDACTED] Leuchars Flying Club. We are suggesting improvements to the application. We are particularly worried that you will seek to NOTAM all day for a flying window which will be very limited in practice. (something all air users including the military are prone to do).

From: [REDACTED]
Sent: 20 January 2021 10:55
To: [REDACTED]
Subject: West Coast Drones ACP

Morning [REDACTED]

I hope you're well in these strange times.

Are you / the Club aware of this ACP that has caused some considerable alarm?

Many of us are engaged, with amongst others, National representative bodies and the General Aviation Alliance to inject some commonsense.

The ACP for example, makes Glenforsa ops impossible when the TDA is active whilst corridors and vertical volumes (up to 950ft) , we believe are excessive. To have maximum flex the drone company plan to NOTAM TDAs as active all day when they are operating. Whilst this is a 5 week trial, the company have aspirations to make it enduring having announced a further trial to use it to deliver normal packages.

There is a feeling that they have used Covid as lever to get the standard 12 week consultation down to 2 weeks; they claim to have a comprehensive picture of West Coast users but only a handful of stakeholders were consulted on the Oban – Lochgilphead ACP they got through (almost covertly by minimising the dist) in the summer....that covered the Crinan Canal route that many of us use as a bad weather low-level route

It will be Flyer magazines lead feature when its released online later today – I have a sidebar outlining my objections as does [REDACTED] who operates the 172 amphibian out of Prestwick.

Whilst we all know drones will play an important role in future society, I believe the ACP is disproportionate, lacks full justification and has failed to consult the full range of stake holders. There is no DACS available.

Let me know if you need more...

All the best,

[REDACTED]

Response 30: Prestwick Flight Centre

From: [REDACTED]
Sent: 31 January 2021 14:06
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Drone Response

Hi [REDACTED]

Thank you for your email and attached response. Your support is much appreciated and your points have been noted.

FYI we are currently in discussions with NATS for Oban/Scottish information to provide a DAAIS service for GA.

Kind regards,

[REDACTED]

-----Original Message-----

From: [REDACTED]
Sent: 31 January 2021 13:36
To: [REDACTED]
Cc: [REDACTED]
Subject: Drone Response

Hi [REDACTED]

I have attached stakeholder response form for you.

Regards,

[REDACTED]

Appendix B: Response form

Name	[REDACTED]
Organisation name	PRESTWICK FLIGHT CENTRE
Position in the organisation	[REDACTED]
Email	[REDACTED]

Feedback

I HAVE NO OBJECTION TO THIS IN PRINCIPAL BUT WOULD LIKE TO ADD COMMENT.

1. MY VIEW IS THAT A 24HR NOTICE IN NOTAMS WILL NOT IN ITSELF BE SUFFICIENT. I KNOW WE SHOULD, BUT IN TRUTH, I OFTEN FORGET TO CHECK NOTAMS. BOTH OGAN AND SCOTTISH INFORMATION SHOULD WARN PILOTS OF ACTIVITY AS A MATTER OF COURSE, AND NOT WAIT TO BE ASKED.
2. THE EXTRA ROOM PROVIDED AT GLENFORSA WILL HELP, BUT MOST OF ITS TRAFFIC WILL FLY UP THE SOUND OF MULL TO GET THERE SO THAT MIGHT BE A BOTTLENECK. YOUR AGREEMENT NOT TO FLY BELOW 1500' CLOUDBASE HOWEVER, SHOULD ALLEVIATE MY CONCERNS HERE.

Response 31: Prestwick Flying Club

From: [REDACTED]
Sent: 01 February 2021 08:02
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: ACP-2020-099 - UAS BVLO

Hi [REDACTED]

Thank you for taking the time to detail your response and providing suggestions. If you feel you need additional time for any additional comments, please feel free to get in touch with me again by Thursday evening and I will incorporate them in our summary report. I have also added you to our list of stakeholders and will ensure any future communications regarding this ACP are shared with you.

Many thanks again and kind regards,

[REDACTED]

From: [REDACTED]
Sent: 31 January 2021 17:44
To: [REDACTED]
Subject: ACP-2020-099 - UAS BVLO

Hi [REDACTED]

Please take this e mail as a response to your document ACP-2020-099 - UAS BVLO Version 3.0 – Dated: 28 January 2021.

Please note this is the first time I have seen the document (received 29 January), and comment closes on 31 January 2021. I suspect my comments apply equally well to ACP-2020-55 which I have not seen

Your request for response is in a PDF inviting a handwritten response and scan. Please consider this e mail as a completed Appendix B in your document

Thanks

[REDACTED]

Please take this e mail as a response to your document ACP-2020-099 - UAS BVLO Version 3.0 – Dated: 28 January 2021.

Please note this is the first time I have seen the document, and comment closes on 31 January 2021. I suspect my comments apply equally well to ACP-2020-55 which I have not seen. The time scale means this is a very rushed response.

Your request for response is in a PDF inviting a handwritten response and scan. Please consider this e mail as a completed Appendix B in your document

Name [REDACTED]

Organisation Prestwick Flying Club

Position [REDACTED]

E mail [REDACTED]

I instruct in land and sea planes in this area

I do not support this application.

1)

To be clear this is not a "Not in my back yard" response. I am very supportive of using such vehicles in this way but the data set out in ACP2020-099 UAS BVLOS is deceptive and flawed -

Quote

"1.3 Skyports is conducting a targeted aviation stakeholder engagement exercise before submitting our finalised proposed airspace design proposals to the CAA for assessment to ensure that all identified interested parties have had an opportunity to review the proposed changes and comment accordingly".

"5.1 Skyports intends to carry out its aviation stakeholder engagement exercise over a 3-week period. We acknowledge this is significantly less than the standard 12-week engagement and 4-6-week shorter engagement as per CAA DA/TDA policy 20200721; however, Skyports believes a shorter engagement period is sufficiently proportionate to the size of the change, the already completed engagements with local stakeholders during 2020 and the urgent imperative to support the NHS in Scotland COVID 19 response."

However to receive such a document 3 days before the closing date suggests a flawed engagement process and to claim anything else is simply deceitful. I am not an isolated "very late contact stakeholder" there are many. The CAA should not accept this as an honest claim and ask for the consultation to be done properly. We are setting the rules for wider applications of such systems and should do it properly

2) There are many features of this proposal which are sensible and I would broadly support. Creating routings low over the sea and more than 3 miles from any airfield is sensible and effectively deconflicts light aircraft from this UAS traffic. It is not clear for this trial why some routes are overland and at greater height – the vehicle clearly has the range to route over sea around the obstruction. Maximum over sea routing and minimum application of greater than 400 ft

Broadly I would support a use of airspace where the UAS remained below 400 ft over salt water. (It is not clear to me how the safety of boats in this track is obtained – no data is given for that.)

NB low level routing over fresh water would be a serious issue for float plane operation and needs a very different approach.

3)

Quote Appendix C response 1

“While operating a constrained leg is feasible, it is less desirable from a UAS operator perspective. As soon as the SUA enters a constrained leg, the SUA will not be able to immediately execute a return-to-home in the event of an emergency as it does not have the space to execute a turn. The SUA will need to complete its exit from the constrained leg and then it will make the return back through the constrained leg, or it will complete its mission if the remote pilot determines that is a safer maneuver. In the event of an emergency that requires the SUA to be grounded immediately while in the constrained leg, the remote pilot will have no option but to land in the sea, resulting in the total loss of technology and payload. Operating in constrained legs is therefore sub-optimal from a UAS operations perspective.

A quick calculation suggests a 2 g turn would only require a diameter of about radius of 1000 ft – so the width claim seems spurious. It also suggests the other routes sought are wider than required. Looking at the unconstrained legs, they too would seem to require ditching in water so this too is a misleading argument.

4) I do not see why access by phone is the prime route of information.

Issue 4 Should private aircraft wish to have access to an active TDA for any reason, phone numbers of the Skyports Flight Operations Team will be available on the relevant NOTAM, which can be called to request entry to that active TDA. If the SUA is airborne or likely to be airborne during the time when the request is made, then the request will be denied; however, if there are no SUA flights taking place or expected to take place during the time for which the request is made, then access is likely to be approved. •If contacting Skyports by phone is not possible, Skyports will explore with Oban Information and Scottish Information about the provision of a Danger Area Activity Information Service (DAAIS) to enable private aircraft en route to contact Skyports to request access. See Issue 5 for more information.

Issue 5 Skyports will discuss with Oban Information and Scottish Information the provision of a DAAIS to cover the area of operations, which will enable aircraft en-route to be able to contact Skyports and to be reminded of any active TDAs in the area. Skyports will discuss

with Oban Information and Scottish Information sharing of our up and down times so that if a private aircraft were to accidentally enter or make an emergency entry into an active TDA, Oban Information or Scottish Information would be able to confirm via radio whether a Skyports SUA was in flight or not.

Why is the prime information route not through NOTAM with Scottish Information and Oban information providing updates. Telephoning while in flight is an unhelpful suggestion Skyports prime update route should be through Scottish Information and Oban information. This is how we deal with danger areas – the range informs Scottish when the range is hot and cold and light aircraft operate with an acceptable level of safety in that manner.

Broadly I would support this aspect of the proposal if access to the TDA was managed in the same way as a danger area using VHF communications.

I would suggest there is adequate time for a proper engagement with the stakeholders and still meet the trial timescales.

████████████████████

Appendix B: Response form

Name	[REDACTED]
Organisation name	Scotia Seaplanes Ltd
Position in the organisation	[REDACTED]
Email	[REDACTED]

Feedback

Scotia Seaplanes Response to ACP-2020-099 (Oban-Mull-Coll)

We are a commercial Declared Training organisation (DTO), based at Prestwick Airport. We conduct frequent seaplane training, adventure flight and filming operations in and around Oban and Mull. Most flights are VFR at low-level, below 1000'. We use the airspace around Lochgilphead and Bute to transit along the coast from Prestwick to these operating areas, and others (eg. Loch Awe, Loch Eck and Loch Lomond). We are registered with the CAA and have Glenforsa Airfield declared as one of our training bases. In 2018-2019, the last 2 'normal' years of operations we conducted over 100 flights, and over 200 landings on airstrips and lochs originating in the Oban, Mull area alone. Even in the constrained operations of 2020 we managed a filming contract with Channel 5 and a scattering of training flights.

We learnt about this ACP through the grapevine on 11 January, with notice that this was a shortened 2 week engagement process, expiring on 24th January 2021. This was subsequently extended by 7 days to 31st January, with two revisions to TDA dimensions and procedures in the final 7 days, allowing little time to fully evaluate them. The current proposals are now quite confusing and are symptomatic of an ineffective consultation process, with the sponsor reacting to unanticipated levels of concern.

Engagement Process (Historical)

One particular statement in ACP-2020-099 stood out and caused me to look further into this particular proposal. Section 3 - "Through targeted aviation stakeholder engagement exercises in support of that application (ACP-2020-038(Craignure)) Skyports developed a comprehensive picture of airspace usage in that area." This was a pretty bold statement, considering this previous consultation lasted only 5 days, was conducted during lockdown when no-one was flying, and did not actually reach out and engage with any of the GA operators. In addition, reference was made to more recently engaging with GA, in regard to ACP-2020-055 (Lochgilphead) – of being "aware of their ... need to enter temporary segregated airspace once active", and suggesting that "...a reduced engagement duration will suffice."

To gain more understanding of ACP-2020-038 (and 055), the CAA Airspace Change Portal was searched. It was through this that I became increasingly concerned at the apparent absence of engagement with, or understanding of the Scottish GA community and its use of these areas. Please indulge me, for this is significant and sets the tone for the manner in which subsequent ACPs have been conducted.

There have been three previous ACP applications. ACP-2020-038(Craignure), ACP-2020-048(Bute) and ACP-2020-055(Lochgilphead). The first of these (Craignure) is critical because it was fast-tracked by the CAA at an Assessment Meeting on 6 May 2020, with a 5 day consultation (normally 6-12 weeks (CAA Policy Annex A3 Process)). All attendees job titles were listed as drone specialities, with little apparent GA input. Skyports submitted that "speed was of the essence to assist with Covid-19 response", made several claims about the efficacy of Mull ferry services and NHS delivery practices, stating this was in direct response to a request from the NHS. As yet they have not shared the evidence, instigation or correspondence of this statement. It is worth mentioning that several local aviation operators (Scotia Seaplanes included) offered their aircraft in March 2020 to support Government and NHS deliveries to exactly these locations, carrying 120kgs plus per load. None of these offers were followed up.

Skyports stated on 8 May 2020 (ACP-2020-038 Targeted Stakeholder Engagement) that they would “proactively reach airspace stakeholders to generate as much feedback as possible”. Their official engagement was from 7-12 May, yet they stated on 6 May they had already completed a targeted stakeholder engagement. This appears to have involved one local schedule operator, the emergency services and some cursory phone-calls. None of the multiple flying clubs or GA representative bodies that regularly use the airspace were researched, contacted or aware of this – and it would appear there was little CAA scrutiny or confirmation of the depth or veracity of this engagement – accepting Skyports claim at face value. This light-touch oversight effectively allows a self-regulating sponsor to decide timescale, depth of engagement and its conclusions, and runs counter to the CAAs own advice that “...effective engagement is a vital underpinning of the airspace change process.”.

Rushed timeframes and no local stakeholder involvement are also apparent in ACP-2020-048(Bute) (withdrawn) and ACP-2020-055(Lochgilthead) (still current). I have supplied Skyports with a comprehensive list of some 27 operators who (under normal non-Covid restrictions) are frequently operating in all these areas. This list is compiled from my experience flying in the area, and also my intimate knowledge, as a current air traffic controller, working this airspace for over 30 years.

Engagement Process - ACP-2020-055(Lochgilthead)

I have specifically advised Skyports that these 27 operators (above) were excluded as stakeholders regarding ACP-2020-055(Lochgilthead), and should be re-engaged. This ACP is arguably more significant to their operations than ACP-2020-099. No details can be found on the CAA portal of exactly when this engagement process was conducted, or who was contacted. There are no publicly available documents showing the proposed heights/dimensions or specifics of ACP-2020-055.

To return to ACP-2020-099.

Operational and Safety Considerations for Scotia Seaplanes

My Head of Training has already submitted to you his considered view that the detail of deconfliction is scant, the use of ADSB-in is unquantified, and that if this is not resolved, may well have a negative effect and financial cost to my business. This would be of the order of £1500-£2000 per flying day lost, not to mention the loss of revenue to Glenforsa Hotel and the local economy.

I have previously asked about gaining access to the TDA. So far you have not provided me with any solution. I note that you have an agreement with Hebridean Air Services. Having invested in Electronic Conspicuity and having ADSB-in and out capability, I have previously suggested you provide a real-time webpage (or supplement the OGN/ADSB network) so that other airspace users can see exactly where the drone operations are, thereby taking their own visual avoidance and being able to cross the TDA.

Telephoning your operative may not be possible when we are operating at low-level in the mountains, likewise the provision of DACS that you allude to in v3.0 is dependent on VHF coverage for either Scottish Info 119.875 (who do not have a radar display) or Westcoast Sector 127.275, who do have a radar display, but are highly unlikely to see your drone at 400ft.

How many drones will be operating at any one time? What are the drone Well Clear parameters? What will be their ADSB identities? Will these be published in the AIP?

Weather

I note that you will now not operate if the cloud is below 1500ft amsl. I assume this is for departure, destination and en-route? If Oban Airport or Glenforsa reports the cloud is below 1500ft will you cease operations? What if a Pirep (pilot report) notes lower cloud along the route? Coastal weather can be very localised and change quickly. I often encounter low stratus and cloud banks on coastal up-slopes around Mull necessitating diversion or descent below 500' to remain in sight of the surface. Can the drone detect any unplanned cloud or fog ahead and avoid it?

Information Presentation and Airspace dimensions – ACP-2020-099

The TDA airspace is overly complicated with 5 different upper levels, and the dimensions are not easily interpreted. The GPS co-ordinates did not display on aviation software (Skydemon), requiring conversion. The scale on GoogleMap was too small and near impossible to assimilate dimensions. Use of UK CAA 1:250000 or 1:500000 charts should be recommended when airspace is concerned. There seems to be no consistent methodology on constructing TDA dimensions or widths. Some TDA legs are 2400m wide, some up to 3000m, which does seem excessive, if slightly random. The Tobermory-Craignure constrained leg in v3.0 is of varying width and reduces from 610m at the eastern end to 420m at the west end.

CAA Policy 20200721 For the Establishment of Permanent and Temporary Danger Areas - states that "The vertical and lateral dimensions and the operating hours of a notified DA/TDA shall be the minimum practicable necessary to enable the tasks to be undertaken within it, subject to the need to avoid over-complication of airspace structures and any environmental considerations"

There is no explanation of the criteria Skyports use to establish either the width or lateral dimensions of the TDAs, nor of the separation standards applied. There is a remark that turning around in a 'constrained leg' is not possible, but Skyports have just blanked my requests to provide empirical data on the turning radius or performance of the drones to justify the statement.

The narrower constrained leg of 500m might seem a more appropriate dimension for all the legs, given that the standard turning radius of a C172 at 60kts is 168m. One would imagine a drone to be more manoeuvrable, indeed if a teardrop turn-back were required, and if the drone were to temporarily exit the constrained airspace during a 180deg turn, the probability of risk during that few seconds is likely to be negligible. Has a risk assessment been carried out?

A standard circular TDA at each destination node could be used of say, 500m radius – within that distance of destination the drone may well be within sight of the drone operator who could intervene if visual manoeuvring were required. Could the plethora of various upper levels not simply be notified as 400ft agl? All pilots are required to carry charts which display ground elevations, pilots can add 400ft to these as required. Indeed most pilots are well attuned to flying and judging at least 500ft above persons, vessels, vehicles and structures.

Conclusion

We recognise and applaud that drone operations can assist in providing services to the NHS and remote communities, and are supportive of future UAV operation, but we feel this process must be conducted transparently and not to the exclusion or detriment of existing airspace users. Segregated airspace is not the answer. We also recognise that Skyports have a legitimate commercial focus, but that seems to have had absolute primacy over the needs of the majority of current airspace users. To date a lot of the claims seem to be hyperbolic at best and misleading at worst, aimed at garnering maximum PR - this has created a lack of trust in your behaviour, which is regrettable. For example, your latest press release presumptuously states "The company is already conducting medical drone deliveries to assist the NHS in Scotland in the battle against COVID-19 and will be expanding its service in the coming months." You ran a 12 day proof-of-concept, with 40 flights? And your ACPs have not yet been approved for the next proof-of-concept trial? I do genuinely wish you well and hope we can work together but you will need to rebuild trust and demonstrate it with the current GA users.

They say comparisons are odious, but I would respectfully refer the sponsor to the next ACP in line, ACP-2020-100(RAF Waddington and RAF Lossiemouth), which ironically arrived in my in-tray this morning. It is everything that ACP-2020-099 is not. It is clear, concise, timely and honest. It gives 6 weeks consultation, 6 months notice of proposed operations, and feels inclusive. It presents the proposed TDA airspace on a relevant CAA 1:500000 aeronautical chart, and the TDA is uncomplicated. And further, despite operating for over 100 years in these areas, the RAF does not claim to have a comprehensive picture of airspace use in the area. I commend it to you as a perfect example of probity.

Conclusion

Taking all these factors into consideration I feel this proposal does nothing to resolve the Detect and Avoid issue (which should be the main focus), nor is it proportionate to the task required. Not enough detail or assurance has been provided to satisfy myself that this ACP takes dutiful account of the safety or needs of other airspace users. That is what happens with a short-circuited process and ineffective consultation.

I regretfully have to OBJECT to the proposals for ACP-2020-099 (and logically also ACP-2020-055) as they stand. I would, however, be happy to engage with simpler revised proposals, in a more considered and realistic timeframe, which respectfully takes account of all current users needs.

[REDACTED]
[REDACTED]

Scotia Seaplanes Ltd

[REDACTED]

31st January 2021

From: [REDACTED]
Sent: 06 February 2021 16:37
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: ACP-2020-099 - Constrained TDA Dimensions.

Hi [REDACTED]

In response to these questions (apologies for the delay I needed to consult with flight ops team).

Generally for the straighter leg segments the unconstrained TDA width is based on turn or orbit diameter whichever is larger (generally orbit), plus a safety buffer mandated by the CAA. Which is why it can extend to approx. 900m either side. The 40m width is for the constrained leg only (near Glenforsa). Variations in TDA size nearer the take-off and landing locations are due to terrain/population density avoidance etc. The TDA designs accommodate the radius of turn.

The drone we are using is the Swoop Kookaburra MkII.

Kind regards,

[REDACTED]

From: [REDACTED]
Sent: 29 January 2021 10:58
To: [REDACTED]
Cc: [REDACTED]
Subject: ACP-2020-099 - Constrained TDA Dimensions.

Hi [REDACTED] thanks for the reply and the information on constrained ops.

I have plotted the constrained TDA on Skydemon Navigation software, using the co-ordinates given, and from what I can see the constrained TDA width actually varies between 610m wide (at southeast end) and 460m (at northwest end), not 40m as you state - are you sure? I also note that the normal TDA widths seem to vary between 2400m and 3000m.

Can I ask ...

Q1-What criteria and analysis do you base the normal and constrained TDA widths on?

Q2-How do you determine the lateral extents of the terminal TDAs at Craignure, Tobermory, Bunessan and Oban?

The turning radius of my seaplane at 60kts, standard rate one turn, 30deg angle of bank, 3degrees per second is 168m, so a 180 degree turn sweeps out 330m.

Q3-What is the drones turn radius at 60kts?

Q4-What make and model of drones are you using?

[REDACTED]

Sent from my Samsung Galaxy S10e - Powered by Three

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

From: [REDACTED]
Date: 28/01/2021 15:44 (GMT+00:00)
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: RE:ACP-2020-099

Dear [REDACTED]

Thanks for this email, especially for your sharing your views and also imparting your wealth of experience and knowledge of the area. We look forward to your formal response later this week.

Thank you also for the recommendations of additional stakeholders. Much appreciated.

We'd be delighted to have a conversation to discuss how we can speed up the safe integration of manned and unmanned to avoid this type of segregation as much as possible in the future. We'll send some dates and times over.

And if there is an opportunity to work together on safe access and trialling collision avoidance/detect and avoid technology and solutions, should this change go ahead or not, we'd be very keen to explore that with you and other local individuals and groups. Perhaps we can discuss that during a call as well. While our proposed operation isn't a proof-of-concept designed to gain publicity, and is designed to provide a trial service to the NHS at no cost to them, we do agree that the real challenge ultimately is safe integration. Within the CAA regulatory sandbox, we're helping the CAA establish the regulatory approvals process for UAS BVLOS in non-segregated airspace.

In response to some of your technical point:

- The VTOL capability is reserved to only support take-off and landing, not to support manoeuvres during flight. It runs on a separate battery system than the battery system uses for forward flight in fixed-wing mode for safety reasons and has been designed to support normal take-offs, aborted take-offs and any other scenario that would require it to hover for a certain amount of time in order to land safely again (e.g. an emergency landing). The system is not designed by the manufacturer for use during forward flight apart from facilitating an emergency landing.

The constrained leg design functionality was designed by the manufacturer to enable the drone to fly below 400ft through mountainous regions. This functionality enables us to plot a route that stays well clear from other aircraft without running the risk of an orbit or RTH being triggered and the drone hitting a mountain

ridge as it is making a turn. Working with the OEM, we've worked out a means of introducing a constrained leg, which is actually safer even if it does limit our options, for the following reasons:

- i. When using a constrained leg, we cannot execute an orbit in the event of the ADS-B picking up the presence of another aircraft should one enter segregated airspace.
- ii. By operating within a constrained leg we take up as little space as possible. The SUA has a small corridor that it will navigate through but will automatically trigger an emergency land if it determines that it has breached that corridor.

The constrained leg provides a very specific corridor so that other airspace users will know exactly where the SUA is operating and have space to avoid it. The strait is more than 4km wide and the constrained leg takes up ~40m.

In addition, following UAS safety standards, the manufacturer decided not to include the function to slow to hover and reverse because it would increase the risk for other airspace users (should it be operating in unsegregated airspace). Travelling at top speed, the SUA would take some time to achieve a stop then turn around and accelerate again. The UAS follows the same rules of the air for manned aviation in this regard which state that if a conflict is detected, a right hand turn should be initiated to deconflict with oncoming traffic.

I hope I have answered most of your concerns.

Kind regards,

[REDACTED]

From: [REDACTED]

Sent: 26 January 2021 12:09

To: [REDACTED]

Subject: RE:ACP-2020-099

Sent from my Samsung Galaxy S10e - Powered by Three

██████████. Thanks for the revised ACP, I have had a good look through it and intend to put in a formal response on safety aspects, and how it might adversely affect my operations, later this week.

From my experience both as a current air traffic controller working Scottish sectors and my detailed local flying knowledge, I am sending you a list of the main stakeholders that fly regularly in all these areas (Oban, Mull, Lochgilphead)– these are airfields, businesses and flying clubs, most in the immediate areas of Scotland, and I think they have a right to hear of your proposals. The NATMAC list is by no means comprehensive, nor is it sufficiently intelligent enough to capture local operations – however, you will know that the onus is on the Sponsor to take all reasonable steps, in accordance with the Gunning Principles, to identify and engage with stakeholders.

First of all, I would like to have a frank and honest dialogue. I will make some points below, but feel free to phone for a chat, if you wish, whenever convenient. ██████████

In general, there must be absolute mutual respect and dialogue between commercial drone companies and current airspace users to ensure that future drone integration is done honestly and openly. This process does not appear to have got off to a good start and there is now a huge amount of distrust and pushback from the General Aviation (GA) community toward both the intention and the process of your drone operations. This serves no-one well.

Two things in particular have aggravated the situation. Poor stakeholder engagement, and hyperbolic marketing. Poor and inadequate engagement, runs against the 3rd Gunning Principle “that adequate time is given for consideration and response”.

Your first ACP 2020-038 (Oban Craignure) was rushed through the normal ACP process with a minimal 5 day consultation in May last year - (I know of operators who have had ACPs stuck in the system for the last 2 years). This was during a period of lockdown when GA was grounded. In this rush to proceed, none of the many flying clubs or representative bodies who normally use the area were contacted. Even if they had been, obtaining considered feedback (beyond a cursory phone-call) within this timescale is an impossibility as most of them (such as the LAA) rely on monthly or quarterly magazines, or committee structures to ‘spread the word’.

I politely asked you for a list of stakeholders for the second ACP-2020-048 (Bute – withdrawn), to give you the benefit of the doubt and to ascertain if you had widened the net for this engagement, but you wouldn’t share it. I have subsequently phoned round as many of the operators that would use not only the Bute area (which is incredibly busy with GA, as a choke point west of the Scottish TMA), but also more significantly, the areas of your third ACP-2020-055 (Lochgilphead), which is the low-level, bad weather route from everywhere to Oban and beyond. I have included these stakeholders below.

To then claim in ACP-2020-099 (Oban-Mull) that you have “developed a comprehensive picture of airspace usage in that area” is really quite astonishing chutzpah. That has incensed a lot of people.

Specifically looking at the revised ACP v2.0 and TDA dimensions. What is the actual width of the original TDA corridors, and also of the ‘constrained legs’? Drones can fly on accurate tracks and can hover - if you needed to turn back, can they not just stop and reverse? Is that not quicker than carrying out a 180deg turn? What is the turning radius?

Nobody doubts that there may be long-term benefit to establishing drone use, and I know you have a commercial desire to proceed as quickly as possible, but to constantly over-emphasise everything in hyperbolic terms of Covid urgency is disingenuous – if blood samples are THAT urgent, my consultant pals suggest that it is really the patient that should be transported, to hospital. The current system does cope, and the reality is you are trying out a proof-of-concept to gain publicity. A proof-of-concept it could be argued that has already been proved. We all know drones can carry packages from A to B, the real challenge is to integrate with existing users – not to ignore them or try and push them out the way. For your information several GA operators (myself included) offered our services to UKGov and ScotGov last March to carry 100Kg+ of supplies between exactly the locations you are covering – how many were contacted or urgently used is another matter.

Should the virus, cloud, wind, rain, ice and rain co-operate, I will be flying frequently from Glenforsa during April. Should your ACP be approved, in whatever form, I would be interested in offering my experience. Whether that be helping to look at a robust system for TDA access (with my ATC hat on), or indeed with a live aircraft to do some ADSB trials or EC tests. I currently carry mode-S and Pilotaware (with ADSB-in and P3i-out), but am also considering SkyEcho as a stopgap to enable ADSB-out).

My door is open.

[REDACTED]

[REDACTED]

Scotia Seaplanes Ltd

[REDACTED]

[Stakeholders List – All these operators are regular and frequent users of this low-level airspace from Prestwick to Bute to Lochgilphead to Kerrera, Oban and Glenforsa, and will be affected by ACP-2020-099 and ACP-2020-55, and would likely have been affected by ACP-2020-038 and ACP-2020-048.](#)

[REDACTED]

Argyll Aero Club (based at Oban Airport) – [REDACTED]

Connel Flying Club (based at Oban Airport) – [REDACTED]

Connel Gliding Club (based at Oban Airport) – [REDACTED]

Loch Lomond Seaplanes [REDACTED]

Scottish Aeroclub (300 members) – [REDACTED]

Strathaven Airfield – [REDACTED]
[REDACTED]

Bute Airfield – [REDACTED]

East of Scotland Microlight Club – [REDACTED]

Cormack Aircraft Services – Cumbernauld Airport [REDACTED]

Thornhill Airfield – Scottish Airsports Club – [REDACTED]

Prestwick Flying Club – [REDACTED]

Prestwick Flight Centre – [REDACTED]

Glasgow Flying Club - [REDACTED]

Tayside Aviation – [REDACTED]

Leading Edge – [REDACTED]

Cumbernauld – Phoenix Flight Training – [REDACTED]
[REDACTED]

West of Scotland LAA Strut – [REDACTED]

Highland Aviation (Inverness) – [REDACTED]

Hillhouse Estates Ltd (Fort Augustus Airfield) – [REDACTED]

Moray Flying Club (RAF Kinloss) – [REDACTED]

Ulster Seaplane Association – [REDACTED]

Ulster Flying Club (Newtonards) - [REDACTED]

Carlisle Flight Training – [REDACTED]

Eshott School of Flying – [REDACTED]

Solway Light Aviation (Kirkbride) – [REDACTED]

Scottish Aeromodellers Association – [REDACTED]

From: [REDACTED]
Sent: 20 January 2021 09:47
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: ACP-2020-099
Attachments: TDA 25 May .png

Dear [REDACTED]

Thanks for your additional email. I have our response to your queries in green below.

I must say I am surprised at the extremely short consultation period and not to have been included or contacted as a possible stakeholder in any of these previous proposals. How many of the flying clubs and organisations that regularly use these airspaces have you contacted? What advice or oversight did the CAA offer about this? We have contacted a number of flying clubs, organisations as well as representative groups. The full list is available in the ACP-2020-099 targeted stakeholder engagement material with the change proposals. We do our best to ensure that all organisations that may be affected by the changes are contact. When we complete our analysis of the local impacts it is possible that some organisations are not captured, which is why we ensure that representative bodies are included on the list of stakeholders so that they might provide recommendations for clubs and companies that have not been included. We are advised by the CAA to consider including some or all of the members of the National Air Traffic Management Advisory Committee (NATMAC). NATMAC is a non-statutory advisory body sponsored by the Directorate of Airspace Policy. The Committee is consulted for advice and views on any major matter concerned with airspace management. More details about NATMAC can be found here: <https://www.arpas.uk/arpas-uk-invited-to-join-natmac/>. Relevant members of NATMAC have been included in our list of target stakeholders. The CAA reviewed our targeted stakeholder engagement strategy and material and agreed to our airspace change timeline, although they will still be looking for good stakeholder engagement regardless of the period of engagement.

Can I also ask why the ACP2020-048 was cancelled? Could you send me a copy of it please, together with a copy of the stakeholder lists for that and ACP-2020-055, I can't locate either online.

- ACP-2020-048 can be found here: <https://airspacechange.caa.co.uk/PublicProposalArea?pid=260>
- ACP-2020-055 Stakeholder List below

Stakeholder	Type of Organisation
Airspace4All	Representative
Airfield Operators Group (AOG)	Representative
Air Task (for Hebridean Air Services)	Air transport provider
Association of Remotely Piloted Aircraft Systems (ARPAS-UK)	Representative
Babcock International	Aviation service provider
British Balloon and Airship Club	Representative
British Business and General Aviation Association (BBGA)	Representative
British Gliding Association (BGA)	Representative
British Hang Gliding and Paragliding Association (BHPA)	Representative
British Helicopter Association (BHA)	Representative
British Microlight Aircraft Association (BMAA) / General Aviation Safety Council (GASCo)	Representative
British Skydiving	Representative
Gama Aviation	Aviation service provider
General Aviation Alliance	Representative

Glenforsa Airfield	Aerodrome
Helicopter Club of Great Britain (HCGB)	Representative
Light Aircraft Association (LAA)	Representative
Maritime and Coastguard Agency	Emergency service provider
Ministry of Defence – Defence Airspace and Air Traffic Management (MoD DAATM)	Military
NATS	Air Navigation Service Provider
Oban and the Isles Airport	Aerodrome
Police Scotland	Emergency service provider
Scottish Air Ambulance	Emergency service provider

I also look forward to receiving copies of the previous Notams as soon as you can. I have attached a copy.

I operate a seaplane Designated Training Organisation(DTO) and adventure flying school based out of Prestwick and Glenforsa - the freedom of this airspace and world-beating landscape has been compared by my clients to Alaska-in-miniature and is a valuable resource in attracting high end tourism to Scotland.

This TDA (together with the previous ones (038, 055 and 048)) are right in the middle of my main area of operations. As such they present a massive disruption and inconvenience to my business. I am frequently based at Glenforsa Hotel and Oban, and have been for the last 10 years, often conducting up to half a dozen flights a day.

As you can imagine, 2020 has pretty much been a write-off for the GA industry - 2021 is showing good promise with a lot of pentup demand - as such I will be operating from and stay at Glenforsa frequently during April and May.

You haven't explained how I can access or cross any TDA. The nature of my operations and frequent coastal low cloud around the West Coast frequently require tactical flight and weather avoidance clear of mountains and at low level over the sea below 500 ft - your TDAs would effectively block of huge areas of access and safety for me, together with potentially losing me thousands of pounds of business.

– Currently NOTAMs will be issued 24hrs before any planned flights detailing which TDAs will be active and between what times and will also include a contact number for airspace users to get in touch with us. All TDAs not in use will be deactivated in ensure airspace is still available to all users. It is envisaged only one or two route will be active at any given time.

For information we currently have a Temporary Operating Instruction (TOI) with the emergency services (HEMS) where they can access our TDA via Scottish Information or Oban Information during their hours of operation, we are in discussions with NATS regarding this.

I understand from your explanation that you will effectively activate a TDA then wait around to see if the NHS require you to carry material? I consider this a completely unacceptable and potentially disproportionate restriction on my lawful business.

To ensure flexibility is given to support the NHS during this pandemic we would potentially need to be available on the day for a given TDA (given hospital ad-hoc demands and opening hours), however we are trying to explore ways to reduce this and I hope to be in touch with you soon with some updates.

What type of drone do you operate, and what are the wind limitations? You say that they carry ADSB in+out - what do they do with the ADSB-IN information, and how are you progressing with developing DAA capability?

Wind Limitation = 27kts.

The drone vehicle we are using has ADS-B IN & OUT capability and I understand it to be able to be picked up by any aircraft with ADS-B IN capability. Please note that this is not a strategic mitigation and only used by us to improve situational awareness, we will always be operating within our active TDA. It has been suggested by another stakeholder that we include this information on the NOTAM, which is what we intend to do.

DAA systems are present but cannot yet be approved by the CAA as a strategic air risk mitigation, as the CAA is currently developing the regulatory framework for approval of DAA systems, hence why we need to operate within a TDA in accordance with CAA regulation until drones can be operated in non-segregated airspace, which is what we think everyone wants so that we can move away from this type of segregation.

As previously requested, do you plan to have a live webpage showing exactly where the drones are at any given time? This, together with a much narrower and lower (say 250ft) non-segregated route, (notammed like the Red Arrows transit areas) might be a more proportionate solution and obviate the need for vast areas of segregated airspace. We are examining ways in which we can reduce the TDA size and altitude and I hope to update you later this week.

On the live webpage point we are currently developing this feature but as I understand it, it is not available to share at this stage. Once available and able to share we would welcome your feedback on it.

I hope this answers the majority of your questions. I will be in touch again today to advise all stakeholder that the engagement period has been extended another week (CAA have just agreed to this) and hope to share some additional revisions if not today by the end of the week.

Thank you for your response and I will be in touch again soon.

Kind regards,

[REDACTED]

From: [REDACTED]
Sent: 19 January 2021 01:39
To: [REDACTED]
Cc: [REDACTED]
Subject: Re: ACP-2020-099

Thanks for responding [REDACTED] I will have a wee read of the information on ACPs-2020-099 and 038 you sent.

I must say I am surprised at the extremely short consultation period and not to have been included or contacted as a possible stakeholder in any of these previous proposals. How many of the flying clubs and organisations that regularly use these airspaces have you contacted? What advice or oversight did the CAA offer about this?

Can I also ask why the ACP2020-048 was cancelled? Could you send me a copy of it please, together with a copy of the stakeholder lists for that and ACP-2020-055, I can't locate either online.

I also look forward to receiving copies of the previous Notams as soon as you can.

I operate a seaplane Designated Training Organisation(DTO) and adventure flying school based out of Prestwick and Glenforsa - the freedom of this airspace and world-beating landscape has been compared by my clients to Alaska-in-miniature and is a valuable resource in attracting high end tourism to Scotland.

This TDA (together with the previous ones (038, 055 and 048)) are right in the middle of my main area of operations. As such they present a massive disruption and inconvenience to my business. I am frequently based at Glenforsa Hotel and Oban, and have been for the last 10 years, often conducting up to half a dozen flights a day.

As you can imagine, 2020 has pretty much been a write-off for the GA industry - 2021 is showing good promise with a lot of pentup demand - as such I will be operating from and stay at Glenforsa frequently during April and May.

You haven't explained how I can access or cross any TDA. The nature of my operations and frequent coastal low cloud around the West Coast frequently require tactical flight and weather avoidance clear of mountains and at low level over the sea below 500 ft - your TDAs would effectively block of huge areas of access and safety for me, together with potentially losing me thousands of pounds of business.

I understand from your explanation that you will effectively activate a TDA then wait around to see if the NHS require you to carry material? I consider this a completely unacceptable and potentially disproportionate restriction on my lawful business.

What type of drone do you operate, and what are the wind limitations? You say that they carry ADSB in+out - what do they do with the ADSB-IN information, and how are you progressing with developing DAA capability?

As previously requested, do you plan to have a live webpage showing exactly where the drones are at any given time? This, together with a much narrower and lower (say 250ft) non-segregated route, (notammed like the Red Arrows transit areas) might be a more proportionate solution and obviate the need for vast areas of segregated airspace.

I again anticipate your speedy reply.

PS My [REDACTED] email address now appears to be back up and running

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From: [REDACTED]

Sent: Monday, January 18, 2021 11:45:36 AM

To: [REDACTED]

Cc: [REDACTED]

Subject: RE: ACP-2020-099

Mimecast Attachment Protection has deemed this file to be safe, but always exercise caution when opening files.

Hi [REDACTED]

Thank you for your feedback in relation to this airspace change. I have attached the stakeholder engagement material for this ACP (ACP-2020-099) and now included you in our list of stakeholders and will ensure any future communications regarding this ACP are shared with you.

I have attempted to answer your questions below as best as possible:

- Other ACP: ACP-2020-038 is now complete and can be found here (<https://airspacechange.caa.co.uk/PublicProposalArea?plD=244>) ; ACP 2020-048 has been withdrawn ; ACP2020-055 can be found here [Airspace change proposal public view \(caa.co.uk\)](#) ;
- NOTAM: Unfortunately I don't have a copy of the previous NOTAM used (I'll attempt to source), however currently NOTAMs will be issued 24hrs before any planned flights detailing which TDAs will be active and between what times and will also include a contact number for airspace users to get in touch with us. All TDAs not in use will be deactivated in ensure airspace is still available to all users. It is envisaged only one or two route will be active at any given time.
- TDA times - To ensure flexibility is given to support the NHS we would potentially need to be available on the day for a given TDA (given hospital opening hours), however we are trying to explore ways to reduce this. I will be able to provide an update this Wednesday on revisions/suggestions.
- Drone specification (inc DAA) - The drone vehicle we are using has ADS-B IN & OUT capability and I understand it to be able to be picked up by any aircraft with ADS-B IN capability. Please note that this is not a strategic mitigation and only used by us to improve situational awareness, we will always be operating within our active TDA. It has been suggested by another stakeholder that we include this information on the NOTAM, which is what we intend to do.
Drone MTOW = 17kg, Cruise speed = 60kts, Weather limitation (<0 degrees Celsius, Moderate Rain). I will hopefully be able to provide additional details this Wednesday.

Both emails have been noted as per your suggestion.

Kind regards,

[REDACTED]

skyports.net



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From: [REDACTED]
Sent: 17 January 2021 12:19
To: [REDACTED]
Cc: [REDACTED]
Subject: ACP-2020-099

Hi [REDACTED], I understand you are the contact at Skyports regarding ACP-2020-099?

I would like some more information about this and the previous ACPs, and would consider myself a major stakeholder on several counts.

I work as an air traffic controller covering the area concerned, I am also a member of the Argyll Aero Club based at Oban, and in addition, I own and operate a seaplane training business - this ACP is within our main area of flying operations.

I have tried to locate your previous ACPs (2020-055, 2020-038 and 2020-048) but cannot find them on the CAAs website, could you possibly forward copies to me please? Could you also send me a copy of any NOTAMs that were issued for the previous associated trials?

How many days are you planning to use any proposed TDA and what times would this be active? How many actual drone flights per day would this involve? What type of drones are they and what roughly is their weight, speed, duration and route? Where would the operators be located? Are there any weather limitations or restrictions (wind speed, rain, cloud etc...).... and do they have any DAA capability? How would I access or cross the airspace? Would there be a live webpage that might display the drone positions in realtime?

Anyway, I look forward to your speedy reply.
Thanks in advance.

[REDACTED]

Please note, my normal contact email is [REDACTED] but there is a server side problem at the moment and not all mail is getting through, so I would appreciate if you could reply primarily to

[REDACTED] but CC to this NATS address ? I will let you know when the primary address is back serviceable.

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If you are not the intended recipient, please notify our Help Desk at Email [REDACTED] immediately. You should not copy or use this email or attachment(s) for any purpose nor disclose their contents to any other person.

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Response 33: Scottish Aero Club

From: [REDACTED]
Sent: 31 January 2021 08:34
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Response to ACP-2020-099 Skyports Oban-Mull-Coll Stakeholder Engagement Reminder & Update

Hi [REDACTED]

Apologies, you are on our list of stakeholders as the representative for Scottish Aero Club, I will ensure all further documents includes this. I am responding individually to all enquiries and appreciate you summarizing the SAC's views below.

I have tried to respond to your questions below as best as possible:

- Many routes have been considered including more southerly routes around the islands however depending on location we are restricted by drone range and LTE coverage, so not all routings are possible.
- Your point about other aircraft not required to have electronic conspicuity is noted, which is one of the reasons why we are currently limited to operating within a TDA.
- Yes as you have stated, this proposal is a short term service to the NHS arising from the COVID pandemic. Any longer term requirement will be subject to a new proposal.
- We can't speak specifically to details of the NHS supply chain as this is based on confidential discussions, however I can provide some general comments on your questions. The NHS supply chain in the Argyll & Bute region is quite varied with different modes of transport used depending on the specific medical facility such as vans, ferries, planes and Royal Mail pickup – often a combination of multiple of these. In addition other factors such as: time of year, time at which sample was taken, service levels of the transport provider, presence of COVID restrictions etc. impact on the overall time from sample taken to results being provided back.

Kind regards,
[REDACTED]

From: [REDACTED]
Sent: 30 January 2021 14:55
To: [REDACTED]
Cc: [REDACTED]
Subject: Response to ACP-2020-099 Skyports Oban-Mull-Coll Stakeholder Engagement Reminder & Update

Good afternoon, [REDACTED]

Thanks for sending me the latest issue, V3, of your document. As I have previously intimated, I am the airspace contact for the Scottish Aero Club, and am responding to your document in that capacity. I did request that you add the Scottish Aero Club to your list of identified Stakeholders. I note that you have not yet do so, in your V3 document at least. Could I ask you to attend to that in any subsequent release.

The Scottish Aero Club (SAC) has some 300 members, many of whom are pilots, who fly over the whole of Scotland, particularly the west coast when conditions allow. I will ensure that our members are aware that this communication is being sent on their behalf. However, if members wish to communicate directly with you, I'd appreciate if you would also take their feedback into consideration in your deliberations.

For the avoidance of doubt, please register this response as a formal objection to your V3 proposals.

I have previously liaised with the LAA West of Scotland Strut and the SAC feedback to date is encapsulated in their response. It is probably not helpful to repeat the response here, but please note this also represents the SACs current view.

Please also note the following points:

1. We consider your proposal to be incomplete until the LAA West of Scotland outstanding questions, and our own, have been answered.
2. Your document doesn't illustrate volumes and typical routes of GA traffic in the region you wish to utilise. I am therefore left wondering whether you have actually considered how many flights/routes might be negatively impacted by your proposed activities.
3. Your chosen routing is a very popular one for GA aircraft. Which other routes have you considered?
4. You appear to have made assumptions that aircraft in the area are ADSB-equipped. There is currently no legal requirement for this, or indeed any other means of Electronic Conspicuity. Your proposal also needs to address those aircraft that do not have these facilities. Indeed there is not even a requirement for these aircraft to be equipped with radio.
5. Your timescales do not allow sufficient time for adequate communication of your proposals, and for collection of feedback arising. See point 6.
6. Please confirm that your current proposals are solely to deliver a short-term service to NHS, arising from the Covid pandemic. I anticipate that our members will be willing to be flexible to accommodate a short-term emergency. Any subsequent, longer-term requirement should be the subject of a new proposal.
7. Could you share information with us on what other alternatives the NHS have considered? There is a good ferry service, to Mull at least. The NHS have also previously requested the Civil Air Support organisation (known as Skywatch, Civil Air Patrol) to deliver goods to the Islands. As a Charity, the Civil Air Support organisation can respond to such requests free-of-charge. Manned flights are likely to be more reliable, and certainly more cost-effective, to deliver against a short-term emergency requirement.

Thanks...

Scottish Aero Club
LAA Strathtay Strut

Begin forwarded message:

From: [REDACTED]
Subject: ACP-2020-099 Skyports Oban-Mull-Coll Stakeholder Engagement Reminder & Update
Date: 28 January 2021 at 16:31:59 GMT

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

Response 34: Scottish Aeromodellers Association

From: [REDACTED]
Sent: 30 January 2021 15:02
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: ACP2020-099 UAS BVLOS in Segregated Airspace (Oban-Isle of Mull-Coll)

Hi [REDACTED]

Thank you for this information. Absolutely, if you have any additional response after your meeting would Thursday evening be ok to get back to me?

Kind regards,
[REDACTED]

From: [REDACTED]
Sent: 30 January 2021 11:51
To: [REDACTED]
Cc: [REDACTED]
Subject: Re: ACP2020-099 UAS BVLOS in Segregated Airspace (Oban-Isle of Mull-Coll)

[REDACTED]

Thank you for the information on Skyports proposals in Oban, Mull and Coll, it is a pity we are finding out about this so late in the day though. We do not have any aeromodelling clubs in the area but we may have members dotted about. In looking at your proposal, any impact on R/C flying would appear to be minimal but we will be guided by any members of our association that contact us. If any conflicts do crop up we would like to come to a resolution that all parties agree on and ensure that both our sport and your commercial operations can co-exist in harmony. We have a meeting arranged for Thursday when we will discuss your proposals and should anything arise from there, I will get back to you

Best regards

[REDACTED]
[REDACTED]
SAA [REDACTED]

On 19:23, 28th Jan 2021, [REDACTED]

Good evening,

Your details have been passed on to me by a fellow aviation stakeholder (apologies if I have been in touch already). I have now included you in our list of stakeholders and will ensure any future communications regarding this Airspace Change request are shared with you.

Please find attached the latest stakeholder engagement material v3 in relation to Airspace Change Proposal ACP-2020-099; appendix C details principal issues and proposed solutions since this process began.

The reminder cover email send out today is also included below. If you need any additional time to digest this material that is no problem, please just let me know. Thank you.

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 signature]

skyports.net

Appendix B: Response form

ACP2020-099 UAS BVLOS in Segregated Airspace (Oban-Isle of Mull-Coll)

Name: [REDACTED]

Organisation Name: Scottish Airports Club

Position in the Organisation: [REDACTED]

Email: [REDACTED]

Feedback - Objection to the proposal

Firstly, a brief outline of my aviation qualifications are, ATPL, PPL, have flown many single and twin engine aircraft types from microlights, sea and ski planes, light aircraft, twin piston, twin turbine, Twin Otter, Jetstream 41, MD 83, and Boeing 757 jets in Scotland and world wide. I have flown for Loganair, Manx, Airtours, have written two CAA approved Airfield manuals, and run the Scottish Airports Club. I have flown in Scotland 30 years privately and commercially. Owner of vintage 1948 Stinson 108-3 (no ADSB) and regularly fly in the proposed areas in this and other aircraft.

We oppose the proposal for the following reasons.

1) No proper consultation or engagement with private pilots and private flying clubs, who use these areas: The stakeholder list does not include the many flying clubs and individual pilots in Scotland, from the UK and Internationally who regularly fly in this area. Lack of understanding of this point is a major safety issue. From the routing chosen, it appears that Skysports are not aware of why these areas are commonly used light aircraft routings, and what kind of, and how many light aircraft use these routes. Although Appendix A: List of identified stakeholders looks impressive, there are only two non-airforce private flying clubs listed. Most pilots we have been in touch with, have not heard of this proposal, or any of the previous proposals. We at Scottish Airports Club, Thornhill airfield, regularly use the proposed flying routes, and we had no knowledge of this proposal or the previous ones, until a few days ago, at the end of January 2021.

2)The reduced engagement period is completely insufficient.

3) TDA's are proposed in the wrong place due to no consultation with private pilots who use this airspace. Part of the routing (particularly through the Sound of Mull) is just not suitable or safe.

Part of the proposed TDA's run along key very well used light aircraft low level routes to and from Oban, and from Lochgilphead, the Crinan Canal, the Sound of Lorn, Loch Linnhe, the Sound of Mull, Lismore.

Many aircraft, twins, single engine light aircraft, seaplanes, vintage aircraft, gyrocopters, microlights, homebuilts, operate frequently in these proposed TDA's, and often fly below 500 feet. These are the known regular routes (key routes) aircraft use from all parts of the country and further afield, flying up to all the west coast and to and around the islands of Scotland.

Oban is a well used airfield and used for re-fuelling, Glenforsa, Mull attracts many pilots with all different kinds of aircraft. It has a much appreciated and admired aviation hotel,

restaurant, and regular aviation flying events. Under the provisions of the ANO, drones must be kept away from airfield flightpaths.

4) Dangerous height on this routing due to no radio coverage, and no radar coverage in this uncontrolled airspace: Many aircraft **DO** fly at low levels in this area. It is very well used, and also, the many pilots who visit Glenforsa on the Island of Mull, fly up the sound of Mull for pleasure and use exactly the route proposed. To operate safely in the Sound of Mull, these aircraft don't just need the SUA's to be clear of the Glenforsa circuit, but also the SUA's need to completely clear of the approach and departure routes to the west and east all the way along the the Sound of Mull.

5) Unsafe operation, no ADSB on most aircraft, no radio or radar coverage: SUA automatic collision avoidance system is depending on the other aircraft carrying ADS-B and broadcasting out. Please note, most aircraft do not have ADSB, which is why a routing needs to be chosen which is clear of most light aircraft's known regular routings, especially as radio and radar contact for all aircraft is not possible and not available at low level in this area.

6) Negative impact on pilots using this airspace: Due consideration has not been taken of the large flying community who use this airspace regularly, and also as a low level route, and there is a lack of awareness of how well used these routes are, and what heights different pilots fly within the Rules of the Air, in Scotland, as well as sea plane considerations.

7) Creating a precedent. A great concern is, that, if this proposal and the previous one are allowed to go ahead, with all the reasons listed above in 1) to 6), this may cause a precedent for future TDA's to go ahead without proper understanding of the airspace or stakeholders concerned.

A constructive suggestion is for Skysports to meet and talk to and work with pilots who regularly use this airspace, to help their understanding of the way pilots fly in these areas, so together, they could re design the proposed airspace change in a way which could suit both parties and not create an unsafe situation in one of the most well used aircraft flying routes in Scotland. The TDA's needs to be re-routed away from the Sound of Mull, Crinan Canal and Lochgilphead in particular. We would be very willing to participate with this discussion.

We realise that UAS may potentially be with us in the future, but, that it why it is so important to consider safety first, before rushing through Airspace Change Proposals in a very one sided way.

Establishing **safe** routings, which work with pilots who use these flying areas, should be an absolute priority for everyone involved.

From: [REDACTED]
Sent: 04 February 2021 13:15
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: ACP2020-099 UAS BVLOS in Segregated Airspace (Oban-Isle of Mull-Coll)

Hi [REDACTED]

I confirm receipt of this response and objection, I confirm it will be included in our Stakeholder Summary Report to the CAA.

Thank you for taking the time to clearly articulate all the relevant points, we would absolutely want to work closely with you regardless of the outcome of this ACP and genuinely appreciate this constructive suggestion. I have forwarded your feedback internally to our team and will be addressing these points.

Many thanks and kind regards,

[REDACTED]

From: [REDACTED]
Sent: 04 February 2021 12:26
To: [REDACTED]
Cc: [REDACTED]
Subject: Re: ACP2020-099 UAS BVLOS in Segregated Airspace (Oban-Isle of Mull-Coll)

Dear [REDACTED]

Please find attached my response to ACP2020-099 UAS BVLOS in Segregated Airspace (Oban-Isle of Mull-Coll). I understand it will be published in full on the CAA website.

Would you mind please letting me know you have received it.

Kind regards,

[REDACTED]
[REDACTED]

Scottish Airports Club
Scotland UK

On Saturday, 30 January 2021, 15:15:19 GMT, [REDACTED] wrote:

Dear [REDACTED]

Absolutely, would a response by Thursday evening be ok? FYI if it saves some time Appendix C of the document states the principle issues and proposed solutions to date (from stakeholder feedback received so far).

I have also included you run Scottish Airports Club to our list. Thank you.

Kind regards,

[REDACTED]

From: [REDACTED]
Sent: 30 January 2021 13:04
To: [REDACTED]
Subject: Re: ACP2020-099 UAS BVLOS in Segregated Airspace (Oban-Isle of Mull-Coll)

Dear [REDACTED]

I do need more time for my response. Please can you give me extra time.

For your list of stakeholders, I run the Scottish Airsports Club at Thornhill Airfield.

Also there are many GA stakeholders not on your list.
Here are just a few:

Strathaven Airfield, [REDACTED]
Perth Airfield Scottish Aero Club details of contact on their website
Fife Airport - Glenrothes [REDACTED]
Highland Aero Club - Easter [REDACTED]
Forfar Strip [REDACTED]
Tayside Aviation Dundee Airfield [REDACTED]
East Fortune Airfield - East of Scotland Microlight Club [REDACTED]
Balado Airfield
Archerfield Airfield - [REDACTED]
Cumbernauld Airport
Phoenix Aviation at Cumbernauld Airport

Many pilots use this route from all over the country and abroad.
Kind regards,

[REDACTED]
Scottish Airsports Club
Thornhill Airfield

On Friday, 29 January 2021, 14:06:36 GMT, [REDACTED] wrote:

Dear [REDACTED]

Thanks for your response and if you need any additional time, just let me know. On the CAA contact I can only direct you to their website, however all feedback received by stakeholders are shared in a summary report post engagement and can be seen on the link I sent you in the previous email once uploaded.

Kind regards,

[REDACTED]

From: [REDACTED]
Sent: 29 January 2021 11:53
To: [REDACTED]
Subject: Re: ACP2020-099 UAS BVLOS in Segregated Airspace (Oban-Isle of Mull-Coll)

Dear [REDACTED]

I received your email yesterday. We operate the Scottish Airsports Club at Thornhill Airfield and have flown commercially and privately for many years in Scotland. Your proposals will affect us tremendously. Giving a deadline of Sunday 31 January is very short notice, but we will endeavour to send a reply this weekend. Can you please give me a contact name and department of the person who is dealing with this in the CAA?

Many thanks and regards,

[REDACTED]
Scottish Airsports Club
Thornhill Aerodrome

On Thursday, 28 January 2021, 19:23:52 GMT, [REDACTED] wrote:

Good evening,

Your details have been passed on to me by a fellow aviation stakeholder (apologies if I have been in touch already). I have now included you in our list of stakeholders and will ensure any future communications regarding this Airspace Change request are shared with you.

Please find attached the latest stakeholder engagement material v3 in relation to Airspace Change Proposal ACP-2020-099; appendix C details principal issues and proposed solutions since this process began.

The reminder cover email send out today is also included below. If you need any additional time to digest this material that is no problem, please just let me know. Thank you.

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 signature]

skyports.net



Response 36: Scottish Mountain Paragliding Club

From: [REDACTED]
Sent: 22 January 2021 15:16
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: ACP-2020-099 Skyports - Oban-Mull-Coll
Attachments: ACP-2020-099 Skyports - Oban-Mull-Coll - Targeted Av Stakeholder Eng Material v2.0.pdf

Dear [REDACTED]

Thank you for taking the time to detail all your concerns regarding this ACP. I have attached the latest stakeholder engagement material for this ACP (ACP-2020-099), which was sent out today (including revisions based on current stakeholder feedback) and now included you in our list of stakeholders and will ensure any future communications regarding this ACP are shared with you. I hope this will answer your concerns raised.

I also share the cover email below, please note the deadline has been extended to **31 January 2021**.

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) which 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?plD=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 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.

Kind regards,

[Redacted signature]

skyports.net



From: [REDACTED]
Sent: 22 January 2021 12:24
To: [REDACTED]
Cc: [REDACTED]
Subject: ACP-2020-099 Skyports - Oban-Mull-Coll

I refer to the above.

I write as the [REDACTED] of the Scottish Mountain Paragliding Club, a club which flies in all the mountainous areas of Scotland and which may therefore be affected by the proposal.

The primary matter which must be addressed is that the proposed method of proceeding, by enabling a Temporary Danger Area to be created, is in our view an totally inappropriate use of the Danger Area procedure to allow, in effect, a substantial alteration of existing airspace, not just for this site, but, if the application is granted, potentially to any other site on which drone activity is contemplated.

It is difficult to see how a drone, of low weight and comparatively limited speed, can pose such a level of risk to other air users as to justify closing any area of airspace to all other aircraft.

If such an appropriation of airspace for a comparatively new form of air traffic is desired, that should be done by a full assessment, and if necessary allocation, of suitable airspace after taking into account all other Air users' requirements. It should not be done by what might be termed a "back door" approach of seeking to create a Danger Area - which of course increases the chances of the operators subsequently claiming a "successful" trial; with no other possible air traffic interference or conflict possible under a Danger Area, how could it be otherwise? - in which to conduct their activities.

It is also hard to accept the attempted shortening of normal notification timescales, when the claimed medical need has doubtless been served adequately by other means until now; this too smacks of opportunism by the operators seeking to circumvent ordinary processes and timescales under the smokescreen of 'urgent medical need' during the pandemic, rather than facing fuller and more detailed scrutiny in the usual way.

We do not claim to be qualified to comment on the claimed medical necessity of the desired drone service. We do however feel entitled to highlight what appears to be a brazen attempt by the operators to achieve their aims by using a procedure intended, in our view, for an entirely different purpose, being the protection of pilots from definite, substantial hazards from operations such as military live fire exercises, bombing ranges, shooting ranges and the like. That, in our view, is the purpose of Danger Areas, to reduce the hazard to pilots and aircraft.

Subverting the procedure for declaring such areas to facilitate the commercial interests of drone operators who are aiming for profit, no matter who their clients are or however worthy the purposes for which the drones may be used, is simply not a satisfactory method of proceeding and we respectfully request that this application, and any other of a similar nature seeking the creation of new danger Areas for such purposes, be refused.

[REDACTED]
[REDACTED]
SMPC

Response 37: Ulster Seaplane Association

From: [REDACTED]
Sent: 04 February 2021 13:03
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: ACP2020-099 UAS BVLOS in Segregated Airspace (Oban-Isle of Mull-Coll)

Hi [REDACTED]

Thank you for taking the time to respond to this ACP. Your comments have been extremely useful and we really appreciate your thoughts on the matter and completely agree that we will need to work closely with the GA community to learn from each other.

I have attempted to answer some of your points below where possible and regardless of the outcome of this ACP would like to work closely with you in the future.

- The width of the unconstrained TDA currently accounts for turn radius, or orbit capability (the larger of the two) together with a buffer. We are currently analysing if this can be reduced further. In this particular location due to LTE signal coverage we cannot fly at 200ft AGL, however are working closely with the manufacturer and have fed this back to them.
- On the constrained leg I have provided some technical detail:
The VTOL (Vertical Take-off & Landing) capability is reserved to only support take-off and landing, not to support manoeuvres during flight. It runs on a separate battery system than the battery system uses for forward flight in fixed-wing mode for safety reasons and has been designed to support normal take-offs, aborted take-offs and any other scenario that would require it to hover for a certain amount of time in order to land safely again (e.g. an emergency landing). The system is not designed by the manufacturer for use during forward flight apart from facilitating an emergency landing.

The constrained leg design functionality was designed by the manufacturer to enable the drone to fly below 400ft through mountainous regions. This functionality enables us to plot a route that stays well clear from other aircraft without running the risk of an orbit or RTH being triggered and the drone hitting a mountain ridge as it is making a turn. Working with the OEM, we've worked out a means of introducing a constrained leg, which is actually safer even if it does limit our options, for the following reasons:

- When using a constrained leg, we cannot execute an orbit in the event of the ADS-B picking up the presence of another aircraft should one enter segregated airspace.
- By operating within a constrained leg we take up as little space as possible. The SUA has a small corridor that it will navigate through but will automatically trigger an emergency land if it determines that it has breached that corridor.

Hopefully this explains why the whole route cannot be a constrained leg.

- The 1500ft cloud base limitation has been implemented by us based on GA feedback, who informed us that when weather is poor they will need to descent below cloud, possible lower than 500ftAGL. We agreed to cease operations when cloud base <1500ft.
- We now have an agreement with NATS (Scottish Information & Oban Information) to provide a DAAIS service, so entry requests into an active TDA can be relayed through them if airborne.
- 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.
- We can't speak specifically to details of the NHS supply chain as this is based on confidential discussions, however I can provide some general comments on your questions.

The NHS supply chain in the Argyll & Bute region is quite varied with different modes of transport used depending on the specific medical facility such as vans, ferries, planes and Royal Mail pickup – often a combination of multiple of these.

In addition other factors such as: time of year, time at which sample was taken, service levels of the transport provider, presence of COVID restrictions etc. impact on the overall time from sample taken to results being provided back.

Really appreciate all your comments and hope the above clarifies some of your queries.

Kind regards,

[REDACTED]

From: [REDACTED]
Sent: 03 February 2021 16:49
To: [REDACTED]
Cc: [REDACTED]
Subject: Re: ACP2020-099 UAS BVLOS in Segregated Airspace (Oban-Isle of Mull-Coll)

3 February 2021

Dear Sirs,

Thank you for your invitation to comment on your proposals for restricting airspace.

We note that our invitation to comment was "late" (1934hrs on 28 January2021). and only allowed for two days to respond to your 29 page document by the shortened "deadline". We do wish to comment and consider that the whole process seems flawed and rushed.

A shortened deadline seems inappropriate considering the lack of comprehensive meaningful consultation with the aviation industry.

Drones do allow for an exciting new expansion of air activity – BUT this should not be at the expense of other forms of aviation. Drones have been around for decades and there is no excuse for unnecessarily restricting airspace during normal hours considering the electronic conspicuity that and ability of drones to be very accurate yet flexible in navigation.

We would welcome a more "innovative" less restrictive proposal – such as accurate routing (which drones are clearly perfectly capable of). We would suggest a height of 200' AGL and night time operation, mostly over the sea. The traffic is unlikely to be simultaneous in both directions so a single narrow night time corridor away from existing users could be clearly achievable.

As other aircraft will not be operating low level at night, conflict will be avoided. In addition night time use will allow for more visibility of the drones through use of strobes and position lights. Night time use will also benefit from the natural calming of weather during darkness. Drones should also carry electronic conspicuity ADSB equipment which can be integrated to their navigation allowing "see and avoid" (of other EC equipped aircraft including drones).

Your proposal appears contradictory, stating that at some points that "the unmanned aircraft is able to operate within a narrower corridor". You then claim that the disadvantage of the narrow corridor is that the drone cannot execute a turn within it... strange considering that the drone is a 17kg max, VTOL with a cruise speed of only 60kts, therefore should be able to slow and reverse direction in a straight line. There is therefore no requirement for "wide" corridors. Strangely no date is given to state the diameter of a 180 turn at 60kts, 50kts, 30kts, 20kts etc..

Drones could be used in addition to conventional aircraft. Already Tecnam has produced a conventional aircraft with an onboard freezer to maintain -85C. The use of conventional aircraft to deliver the vaccine to smaller airfields, from where "controlled" drone departures could be scheduled after dark. What "work" has already been done with the NHS? Have Skyports also used conventional aircraft? If not why not?

Satellite technology allows for full tracking of drones. It should be used and the "spider tracks" of these flights broadcast live to the internet and accessible by the public via a series of weblinks detailed on Skyports website.

We note that the proposal severely affected established aerial uses. This is unacceptable and further demonstrates a flawed concept. The proposal also states that if the MOD wish to use the area, that Skyports won't operate. If Skyports amended its proposal to take advantage of useful characteristics of Drones, i.e operate at night, and state that they would give way to all manned aircraft it is likely that no conflicts would ensue and with the calmer conditions at night, better results would be achieved.

Is there a reason for "Skyports will not operate if the cloud base is below 1500ft AMSL."? Clearly a benefit of the drone would be the ability to be unaffected by cloud. If operated at night, the ability to operate through cloud should be taken advantage of. Cloud moves around and a single website is no guarantee that cloud can be avoided.

We note that no definite proposal to liaise with NATS has been stated. In light of the "Air Navigation Order PART 10 Prohibited behaviour, directives, rules, powers and penalties

CHAPTER 1 (6) The pilot in command of an aircraft flying either within an area for which regulations have been made for any reason referred to in paragraph (1)(c) or within airspace notified as a Danger Area must immediately comply with instructions given by radio by the appropriate air traffic control unit or by, or on behalf of, the person responsible for safety within the relevant airspace. "

It would make sense to designate a NATS unit so that there is less likelihood of conflict with other air users and aircraft may safely travel through. Without this agreement, an airborne pilot could legally travel right through the danger area at the same time as a drone. As radio coverage low level in this area will be limited, OBAN should also have full information.

We suggest initially working with established airfields and also operating at night would remove many objections and provide a more useful reliable service. Clearly working with the existing experts would produce better results and demonstrate a more considered approach, which would be more likely to receive approval from the CAA.

We note the numerous issues that would "ground" Skyports drone and suggest that the reality of reliable aerial delivery means that this will not be a primary service. The old saying "time to spare – go by air" will prove to come true.. therefore manned backup will always be required. This exercise is clearly to establish how useful drone delivery will be. In other areas of the world with more predictable weather drone delivery will clearly be more effective. To maximise success and minimise disruption we again suggest night time operation will prove to be the most beneficial.

We hope that these comments have been useful in helping you adapt your proposals.

Kind regards,

[REDACTED]

For – Ulster Seaplane Association

From: [REDACTED]

Date: Thursday, 28 January 2021 at 19:24

Cc: [REDACTED]

Subject: ACP2020-099 UAS BVLOS in Segregated Airspace (Oban-Isle of Mull-Coll)

Good evening,

Your details have been passed on to me by a fellow aviation stakeholder (apologies if I have been in touch already). I have now included you in our list of stakeholders and will ensure any future communications regarding this Airspace Change request are shared with you.

Please find attached the latest stakeholder engagement material v3 in relation to Airspace Change Proposal ACP-2020-099; appendix C details principal issues and proposed solutions since this process began.

The reminder cover email send out today is also included below. If you need any additional time to digest this material that is no problem, please just let me know. Thank you.

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?plD=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.net



**WEST OF SCOTLAND STRUT Response and Objection to :-
UAS BVLOS in Segregated Airspace (Oban-Isle of Mull-Coll) (ACP-2020-099)**

1. Introduction

- 1.1. This response and objection to the TDA proposal is from the West of Scotland Strut and is based upon the questionnaire model developed by the GAA in previous drone / UAV ACP Consultations.
- 1.2. West of Scotland Strut is a local organisation of pilots many of whom are frequent users of the airspace in consultation here. The West of Scotland Strut was however not listed in the list of consultees
- 1.3. **West of Scotland Strut Comments and Objections are identified in blue**
- 1.4. **The West of Scotland Strut deems this objection and response to be only partial as there was insufficient information in Skyport Proposal to be able to reach a full meaningful opinion.**
- 1.5. **The West of Scotland Strut would be pleased to respond to a suitably detailed proposal and with associated time allowed for due consideration.**
- 1.6. This response and objection is based upon the information available to the GAA as at :18 January 2021
 - 1.6.1. namely those documents published on the CAA's ACP Portal - UAS BVLOS in Segregated Airspace (Oban-Isle of Mull-Coll) (ACP-2020-099)
 - 1.6.2. Individuals mail correspondence by Skyport shared by West of Scotland Strut Members and others
- 1.7. **The West of Scotland Strut object to the limited time permitted for response to this consultation.**
- 1.8. The West of Scotland Strut note that the area covered by this ACP is an area of outstanding scenic beauty and is frequented by many pilots from all over the UK and further afield as are the airfields in the area.
- 1.9. The West of Scotland Strut note that the area is particularly prone to unforecasted changes in weather including sea fog, resulting in reduced ceiling heights and visibility.
- 1.10. The area of this ACP is popular with aircraft, civil and also low level military, routing north/south.
- 1.11. The West of Scotland Strut in responding to the ACP pose the following questions to Skyport as the information in the consultation document was incomplete.
- 1.12. **Where the information is available as 1.7.1 and 1.7.2a the information is entered for confirmation in bold Red.**
- 1.13. However where the information is not available Skyport are requested to give consideration to the question and to provide a response.

2. Initial Questions

- 2.1. What type(s) of drones will be used?
- 2.2. What size(s) of drone will be used? **Wingspan = 2220mm; Length = 1630mm Speed 60Kts.**
- 2.3. What will be the maximum all up weight(s) for the drone(s) to be used? **MTOW 17kg**
- 2.4. Which drones will carry what electronic conspicuity devices? **ADSB - IN and ADSB - Out**
- 2.5. What real time other traffic monitoring will be available to each drone operator, e.g. visual, radar, Flarm display, Flightradar24 display, ATC liaison, etc.?
- 2.6. Will the lack of a functioning electronic conspicuity device obligate the cancellation of a flight?
- 2.7. Does the electronic conspicuity provide for either autonomous or operator instigated avoidance of other traffic ?
- 2.8. What facilities are provided to avoid other traffic that does not carry electronic conspicuity ?
- 2.9. What will be the flight durations? **30 Mins**
- 2.10. Please give example flight profiles in time and space.

- 2.11. How many flights per day mid-week? **Frequency is currently unknown as it will be in response to NHS demand on the day**
- 2.12. How many flights per day weekends and bank holidays? **Frequency is currently unknown as it will be in response to NHS demand on the day**
- 2.13. Will the flights be in VMC and IMC, or just VMC? **VMC**
- 2.14. Will there be day and night flights, or just day flights? **Day time only**
- 2.15. If not in IMC – Why not ?
- 2.16. How many flights will there be simultaneously airborne?

3. Routing / Danger Area Definition

- 3.1. Please provide diagrams, including a 1:500,000 CAA VFR chart fragment, showing:
 - a) the projected operating area(s), - **Included partially in ACP Document but not as VFR Sectional**
 - b) the buffers used, the resultant proposed airspace volume(s), **Included partially in ACP Document but not as VFR Sectional**
 - c) the rules for each of the airspace volumes ?
- 3.2. To what degree of accuracy are the drones able to navigate both horizontally and vertically ? i.e. +/- X m vertically and +/- Y m horizontally
- 3.3. How is the volume of airspace classed as a danger area related to this capability ? (why is/are the projected volume / dimensions required ?)
- 3.4. Please explain the reasoning behind this choice of airspace / routing and the alternatives that were considered with reasons for their dismissal ?
- 3.5. Why, if this is not the case, was a direct from / to route not chosen ?
- 3.6. Please show how the projected airspace volume(s) can be subdivided horizontally for activations?
- 3.7. Please show how the projected airspace volume(s) can be subdivided vertically for activations?
- 3.8. What activity time windows are projected for the NOTAMs ? i.e. matching operating times and if not why not ?
- 3.9. Typically how far in advance of activity will a NOTAM be issued ? **24 Hours before (At least ?)**
- 3.10. What will the minimum time between a NOTAM being issued and the activity taking place?
- 3.11. How will other aviators be able to obtain real time actual activity details?
- 3.12. How and how far in advance will other aviators be able to obtain projected activity details?
- 3.13. Please list the aviation bodies that have been included in the consultation **Included ACP Document – (West of Scotland Strut Comment - But appears to be too limited in scope)**
- 3.14. Please give details of any noise consultation being carried out

4. Assumptions and Locality Specific Items

- 4.1. In order to produce this objection and response it has been assumed that:
 - 4.1.1. *The West of Scotland Strut object to Item 6.1 of the Skyports proposal (below) which appears to exclude non commercial flights in agreeing TOI with commercial and emergency services.*

“6.1 Airspace deconfliction Skyports will produce comprehensive and robust airspace deconfliction procedure via a Temporary Operating Instruction (TOI) that secures the approval of relevant aviation stakeholders that may need to enter the TDA once activated, e.g., emergency services, and Commercial airplane/helicopter operators. Skyports will engage relevant aviation stakeholders separately on this document and secure their written approval before operating.”

Item 6.2 of the Skyports proposal (below) is impractical / unachievable with regard to West of Scotland Strut members due to numbers and diverse locations

coupled with the timing which is a period of potentially intense activity by West of Scotland Strut members attending the WEST OF SCOTLAND STRUT 75th Anniversary Tour of Britain.

"6.2 Continued monitoring While the TDA is in operation Skyports will undertake regular engagement with aviation stakeholders via email (or phone) at the end of each day of active operations. Skyports will monitor any feedback received on the CAA Airspace Portal or received directly by email or phone and collate the feedback and provide regular updates to the CAA when the TDA is activated and after it has been deactivated."

- 4.2. Drones will be VTOL or near-VTOL ?
- 4.3. Existing GA activity should be able to continue broadly as now ?
- 4.4. The plans indicate operation at or above Oban Airport. Why is this required and how is this integrated with other traffic at the airport ? Who will have priority in landing for instance, a manned or a unmanned flight ?
- 4.5. Please advise what facilities are provided to ensure the unhindered and safe continued operation of airfields, airstrips and airports within or close to the designated TDA ? **Route planning has initially been based on any information we have been able to obtain, for example Glenforsa Airport states it is closed until 15th July, however this engagement has brought to our attention that this airfield is still in use (with 24hrs notice according to owner) and we are subsequently working on a new route around this location. This is planned to avoid any circuits taking place.**

Our Head of Technology informs me that as long as you have an ADS-B IN connection, it will be picked up.

West of Scotland Strut Comment – there is no requirement for permit aircraft to have ADSB-In fitted and are you therefore proposing a change to the principle of unmanned avoiding manned aircraft ?

5. To minimise the impacts upon powered general aviation flights operating in the vicinity of the proposed airspace all of the following conditions need to be satisfied:

- 5.1. If the proposal is approved by the CAA there must be a full Post Implementation Review (PIR) as per CAP1616 at least involving all those consulted during this phase of the ACP.
- 5.2. Part of the PIR must include the provision of an electronic record to those consultees requesting it showing all flight profiles in a format readily interpretable such as kml.
- 5.3. To permit safe manned overflight in low cloud base conditions / to permit flight to preserve life.
- 5.4. To limit the impact upon other aviation by the drone activities - The airspace to be no larger than is actually needed, and smaller volumes of the overall airspace to be able to be activated separately
- 5.5. All of the following are to aid pre-flight planning:
 - 5.5.1. NOTAM'd activity will reflect **actual** operations rather than periods within which operations **may** take place
 - 5.5.2. At no time will any of the airspace be activated with less than 24 hours notice by NOTAM
 - 5.5.3. Other than in exceptional circumstances all planned activity will be NOTAM'd at least 7 days in advance
 - 5.5.4. No NOTAM will cover more than one day's activity
 - 5.5.5. As soon as a NOTAM'd activity is changed or cancelled it will be re-NOTAM'd
 - 5.5.6. General planned activity details will be published on a website as far in advance as possible

5.5.7. Anyone can subscribe to an automatic email service notifying them of changes to that general planned activity

6. General Points of Objection

6.1. Consultation

The consultation period allowed initially and the limited number of consultees are a matter of serious concern appearing to be an attempt to avoid serious and effective consultation with affected parties.

6.2. Dangerous Goods

Carriage of "dangerous goods" as stated by Skyports without the correct protocols for firstly assessing suitability and risk of such transport and secondly for handing any loss or inadvertent landing away from destination is placing an unacceptable risk on the community over which it is flying.

6.3. Contact

Expecting pilots to call a telephone number of unknown call handling capacity, possibly at weekends and in numbers in order to find out if they will be able to fly to for instance Glenforsa on a sunny day is an unreasonable restriction of the freedoms currently enjoyed by pilots from all over the UK and further afield

6.4. Economic Justification

The economic justification, although in detail is unknown, appears spurious for the potential severe economic impact upon particularly Glenforsa Airfield and flying in general in this area. There is a frequent ferry service to Mull and adequate road transport for carriage of any "urgent" samples and that do not require 24 hours notice by NOTAM to be activated

6.5. Integration

It is safer and far more practical for new technology to adapt to the existing technology and operating environment, particularly when in the minority, rather than the inverse.

6.6. Radio Coverage / Drone Control

Radio communication for pilots and to contact Scottish Information, Oban Airfield or for blind calls in this area is hampered by terrain. It is presumably so for drones operating at low level and so the feasibility of operator controlled actions, emergency, recall or traffic avoidance, is assumed to be highly unlikely placing others at resultant risk.

6.7. Impact Assessment

The proposal appears to have little understanding of general aviation normal operation and has apparently not given any consideration whatsoever to the impact upon the numerous organisations and individuals that may be affected. A full impact assessment with the participation of all affected parties, economic or otherwise, should be carried out in determining the need and the available airspace requirements.

7. Additional notes pertinent to this response but not part of it:

7.1. Following all the points above will give collateral benefits through:

7.1.1. Limiting the impacts upon sea bird populations

7.1.2. Limiting the overland noise profile

7.1.3. Skyport to facilitate a Danger Area Crossing Service (DACS) or Danger Area Activity Information Service (DAAIS) for GA activity

7.2. During all NOTAM'd periods the drone operator(s) will need to be contactable by a number of aviation agencies including Aeronautical Rescue Co-ordination Centre (ARCC)

7.3. The commercial or medical justification for this ACP is not made clear. The suggestion of "urgent" medical transport of "dangerous" goods appears to be at odds with the availability of ferry services, road transport and local air services.

7.4. In remote areas the principle of medical management of serious illness is normally regarded as the "evacuation of the patient to a specialist unit by the most expeditious means, following stabilisation by an expert team"

7.5. Truly "dangerous goods" carriage by unmanned drone and with the potential for loss appears to be unjustified in risk terms and probably against a number of regulations.

7.6. The transport of "medical supplies" would appear to be a substitute for correct planning and control of logistics and would seem to raise an unnecessary additional cost to the NHS.

7.7. The cost of a drone operator on standby purely for occasional demands from the NHS would at first glance seem to be unviable economically and unjustifiable against other calls upon the NHS finances such as front line care.

7.8. The Air Ambulance remains available for patient and urgent medical transport and is able to operate in IMC.

7.9. A base justification by Skyports is accomplishing sample transport faster than by road / conventional means. However the 24 hour advance notam would appear to obviate that possibility. Likewise achieving the half day turnaround as suggested. Unless the TDA is intended to become permanent.

West of Scotland Strut is Contactable via [REDACTED]

[REDACTED]

[REDACTED]

Individuals

Response 39: Individual A

Hi [REDACTED]

Glad to help. Happy for you to share my email address in relation to this ACP. Appreciate if you can consolidate any response from Connel Flying club with your representative if feasible.

Many thanks,
[REDACTED]

Get [Outlook for iOS](#)

From: [REDACTED]

Sent: Wednesday, January 13, 2021 4:13 pm

To: [REDACTED]

Subject: Re: Drone activity west coast Scotland

Hi [REDACTED]

Thanks for all that, really interesting, did not mean to duplicate others, apologies.

Would you be happy to have your email passed on to members?

Stay safe
[REDACTED]

Sent from my iPad

On 13 Jan 2021, at 15:12, [REDACTED]

Hi [REDACTED]

Absolutely no problem. Air safety is my primary concern and I think its really important to have these conversations to understand everyone's concerns. FYI I have also shared some details with your colleague who is a representative of Connel Flying Club at Oban Airport, however will attempt to answer your queries below:

Can you say if you have to comply with the uk height limit of 400ft above the surface?

The 400ft AGL altitude limit is for VLOS drone operators (see CAA drone code for additional details). As we are operating BVLOS and have sent an operational safety case being assessed by the CAA, we can operate within our designed TDA. We have tried to where possible remain within 400ft AGL and variations maybe due to terrain heights or to ensure all terrain heights are exceeded during any return home function of the drone.

What speed the drone flies at?

60kts cruise speed

is it able to locate and avoid? What size is it?

Drone has electronic conspicuity and ADS-B IN & OUT. This is not a strategic mitigation as the drone is intended to be operation within the TDA.

Size: MTOW = 17kg; Wingspan = 2220mm; Length = 1630mm

What does it look like? What might be the daily frequency?

Frequency is currently unknown as it will be in response to NHS demand on the day.

Will the area be activated automatically each day to allow for late planned activity?

NOTAMS will; be published 24hrs before intended operation together with a contact number for Skyports (the more notice you can give the better to allow for coordination on our end). For HEMS deconfliction we are liaising with Oban and Scottish Information and have a separate temporary operating instruction (TOI) with them.

will the flights be 24 hours?

No, the flights will be during daylight hours only, further details will be promulgated on the NOTAM (as to which TDAs are active etc), 24hrs prior to intended operation.

What effect might the activity have on GA circuits and approaches to island airfields and Oban airport?

Will sky echo and pilot aware display them?

Route planning has initially been based on any information we have been able to obtain, for example Glenforsa Airport states it is closed until 15th July, however this engagement has brought to our attention that this airfield is still in use (with 24hrs notice according to owner) and we are subsequently working on a new route around this location. This is planned to avoid any circuits taking place. On this point given your experience and local knowledge of this area, any suggestions you can give are appreciated.

Our Head of Technology informs me that as long as you have an ADS-B IN connection, it will be picked up.

There are concerns being voiced that some of the low level routes used by GA when the west coast weather is poor could now be unusable.

This is understood and we will continue to work through these concerns. Initially it would seem a modified routing around this section would be a preferable solution. I will hopefully have an update next week on this.

I hope this answers some of your concerns, as mentioned above if you have any suggestions we are very open to them; as I mentioned to your colleague if you would like a call this week to discuss we can put something in the diary?

Kind regards,

[REDACTED]

-----Original Message-----

From: [REDACTED]

Sent: 13 January 2021 00:58

To: [REDACTED]

Subject: Re: Drone activity west coast Scotland

Hi [REDACTED]

Lots of questions going around members! Can you say if you have to comply with the uk height limit

of 400ft above the surface? What speed the drone flies at? is it able to locate and avoid? What size is it? What does it look like? What might be the daily frequency? Will the area be activated automatically each day to allow for late planned activity? will the flights be 24 hours? What effect might the activity have on GA circuits and approaches to island airfields and Oban airport? Will sky echo and pilot aware display them?

There are concerns being voiced that some of the low level routes used by GA when the west coast weather is poor could now be unusable.

I imagine you have more to do than this but it might help settle concerns.

Thanks and stay safe

[REDACTED]

Sent from my iPad

> On 12 Jan 2021, at 12:06, [REDACTED] wrote:

>

> Hi [REDACTED]

>

> Thank you for your email and feedback. Regarding electronic conspicuity we shall feedback this information to the CAA (stakeholder engagement summary) and I will also note that this information would be useful for other airspace users and suggest this is incorporated into the produced NOTAM.

>

> I have also attached the stakeholder engagement documentation and will include you in any future communications.

>

> Thank you for your support and kind regards,

>

> [REDACTED]

> [REDACTED]

> skyports.net

>

>

> -----Original Message-----

> From: [REDACTED]

> Sent: 11 January 2021 12:27

> To: [REDACTED]

> Cc: [REDACTED]

> Subject: RE: Drone activity west coast Scotland

>

> Good afternoon [REDACTED]

>

> Thank you for your email and for getting in touch.

>

> Firstly, I can confirm that our drones do carry EC devices (ADS-b in and out). Thank you for the suggestion to promulgate to all other airspace users, which we will find a means of doing so.

>

> Secondly, we've been dealing with Oban Airport t to capture all the activities that go on at the airport but we are more than happy to include the Connel Flying Club as a dedicated stakeholder for the purposes of ACPs in the area. I copy my colleague [REDACTED] who will add you to the list of stakeholders and who will ensure you get a copy of all current and future documents and communications in relation to this ACP.

>

> Any questions or issues along the way, please let us know and thank you for the support from the

Covid perspective.

>

> Thanks and all the best

>

> [REDACTED]

>

> [REDACTED]

> [REDACTED]

> [REDACTED]

> Connect via LinkedIn

> skyports.net

>

>

>

>

>

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>

>

> -----Original Message-----

> From: [REDACTED]

> Sent: 11 January 2021 12:14

> To: [REDACTED]

> Subject: Drone activity west coast Scotland

>

> Hello,

>

> I note your proposals and have no objection in light of the Covid situation, however I have not found an indication as to whether your drones carry electronic conspicuity devices which I would see as a safety necessity.

> If they are so equipped it would be useful to have this fact promulgated to all other airspace users considering the current CAA encouragement on this issue.

>

> [REDACTED] Connel flying club, based at Oban Airport.

>

> Surprised this club is not listed as one of the stakeholders.

>

> Sent from my iPad

> <ACP-2020-099 Skyports - Oban-Mull-Coll - Targeted Av Stakeholder Eng Material.pdf>

Response 40: Individual B

From: [REDACTED]
Sent: 28 January 2021 12:01
To: [REDACTED]
Subject: RE: Version 2 ACP-2020-099 Oban-Mull-Coll Targeted Aviation Stakeholder Engagement Material

Yes it will however as mentioned we don't rely on this as a strategic mitigation, which is why we operate within the TDA.

From: [REDACTED]
Sent: 28 January 2021 11:52
To: [REDACTED]
Subject: Re: Version 2 ACP-2020-099 Oban-Mull-Coll Targeted Aviation Stakeholder Engagement Material

So to clarify. If an aircraft has a conspicuance device will your drone take avoiding action.

On Thu, 28 Jan 2021, 11:43 [REDACTED] wrote:

Hi [REDACTED]

Thanks for your email. No our drone will not be able to detect aircraft without EC, which is why the drone ADS-B system is not being use as a strategic mitigation (purely to improve situational awareness for those aircraft who have EC). We will only be operating within the proposed TDA.

I will be sending out a reminded email later today which will elaborate on this point and also explain how we intend to stop operations when cloud base is <1500ft.

Kind regards,

[REDACTED]

From: [REDACTED]
Sent: 27 January 2021 17:08
To: [REDACTED]
Subject: Re: Version 2 ACP-2020-099 Oban-Mull-Coll Targeted Aviation Stakeholder Engagement Material

Referece the following statement in your 22nd jan email: -

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.

Can you confirm that your Unmanned Aircraft will be able to detect and avoid aircraft like my own that do not have any electronic conspicuity equipment?

On Fri, 22 Jan 2021 at 13:42, [REDACTED] wrote:

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) which 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 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.

Kind regards,

[Redacted signature]

skyports.net

From: [REDACTED]
Sent: 12 January 2021 14:09
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: UAS BVLOS in Segregated Airspace (Oban-Isle of Mull-Coll)
Attachments: ACP-2020-099 Skyports - Oban-Mull-Coll - Targeted Av Stakeholder Eng Material.pdf

Dear [REDACTED]

Thank you for your email which has been forwarded to me by my colleague [REDACTED]. Please see points below in relation to your questions:

- Private Aircraft (with and without transponders): NOTAMS, 24 hours prior to intended operation will be published detailing the route and times we intend to operate. TDAs for routes not in use will be deactivated. The drone system we use will have electronic conspicuity and ADS-B IN & OUT capability to improve situational awareness.
- Should private aircraft need to have access to a TDA, we can discuss the best option that could suit yourself. A phone number will be published on the NOTAM where any access to an active TDA can be requested. In this situation the more notice we have the easier it will be to coordinate.
- Max drone heights: the drone heights specified within each TDA have tried to remain within 400ft AGL where possible, however due to terrain the altitudes may exceed this, hence the differences stated.
- Timings: Drone operations will take place for a 5 week period from 8th April during daylight hours. The exact route and timings for a particular day are currently unknown at this stage, however all information will be promulgated via NOTAM 24hrs before, with a contact number for Skyports.

This engagement is the part of the targeted aviation stakeholder engagement, attached to this email is the engagement material we sent out yesterday. Any response can be via email and we would appreciate if you can give further details of the company/organisation you represent, or if you are in the GA community. I will then add you to our stakeholder list for any future communication.

Kind regards,

[REDACTED]

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From: [REDACTED]
Sent: 11 January 2021 16:55
To: [REDACTED]
Subject: UAS BVLOS in Segregated Airspace (Oban-Isle of Mull-Coll)

Can you please advise me what steps are being taken to enable private aircraft to continue to operate in the TDA including those without and with transponders.

Can you advise me why a max height of 700ft is specified when drones can currently fly up to 500ft.

Can you advise me what the proposed times for such restrictions and how much warning might be given.

What public consultation will take place with the aviation community.

Can you advise me where in the proposal these is a place to comment.

[REDACTED]
Edinburgh, Scotland

Response 41: Individual C

From: [REDACTED]
Sent: 19 January 2021 21:13
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: UAS BVLOS in Segregated Airspace (Oban-Isle of Mull-Coll)

Hi [REDACTED]

Thank you for taking the time to respond in relation to this ACP. Your objection has been noted and I have attempted to answer your questions/queries as best as possible below:

- In poor weather current proposal will impact GA low level routing – we are currently reassessing our routes and TDA heights (in particular around Glenforsa) and hope to update you at the end of this week.
- Glenforsa – At the time of our initial route analysis it was stated this airfield would be closed until 15th July, however we are now in touch with the person who runs this airfield and understand this information was from 2020 and requires updating. We are in the process of revising our routing further away from this airfield (also exploring TDA size reduction where feasible) and I hope to share some revisions and suggestions by the end of this week.
- NOTAM detail and communication – Currently NOTAMs will be issued 24hrs before any planned flights detailing which TDAs will be active and between what times and will also include a contact number for airspace users to get in touch with us. All TDAs not in use will be deactivated to ensure airspace is still available to all users. It is envisaged only one or two route will be active at any given time. To ensure flexibility is given to support the NHS during this pandemic we would potentially need to be available on the day for a given TDA (given hospital ad-hoc demands and opening hours), however we are trying to explore ways to reduce this.
For information we currently have a Temporary Operating Instruction (TOI) with the emergency services (HEMS) where they can access our TDA via Scottish Information or Oban Information during their hours of operation, we are in discussions with NATS regarding this.
- Engagement period – A timeline for this airspace change, including period of targeted engagement with relevant aviation stakeholders was agreed with the CAA. We have subsequently agreed with the CAA an extension of the targeted engagement window for this ACP by a week. I hope to be in touch tomorrow with all stakeholders to share this.
- Suggestions (Night flying and routing) – Thank you for these suggestions. As mentioned above we are currently reassessing our routing. With regard to night flights, currently given the operating hours of various hospitals and ad hoc demands, night flights would be less beneficial. Our drone currently isn't approved to fly at night time, however we are looking into both these suggestions.

We hope to update you regarding the extended engagement period tomorrow and with further route amendment/suggestions later this week.

Thank you for your response and feedback.

Kind regards,

[REDACTED]
[REDACTED]

skyports.net

Appendix B: Response form

Name	[REDACTED]
Organisation name	GA Pilot
Position in the organisation	[REDACTED]
Email	[REDACTED]

Feedback

I oppose the proposal.

In its current form the proposal would have a seriously detrimental impact for GA which use the sound of mull as a main artery to access the wider west coast of Scotland area.

This proposal has the potential to cut off much of the west coast of Scotland to GA aviators on less than perfect days.

The Tobermory-Craignure TDA makes Glenforsa airfield inaccessible as it conflicts with the airfield's visual circuit.

The weather on the west coast of Scotland can be difficult to forecast with low clouds being an issue close to the mainland with inland Scotland and the islands being unaffected. This results in the need to be able to operate in the sound of mull at lower levels. The proposed TDA conflicts with this established operating practice and create a potentially dangerous and stressful situation.

The proposal does not set out how this TDA will be used and how access, for example a DA Crossing service, will work in practice especially considering the poor VHF communications in the area and the need for such a service when cloud bases are low.

I suggest that the sponsor considers using the sea South and West of Mull to access Coll and that Tobermory be serviced by a site on the West of the island. Alternatively operating the proposed TDA only during night hours may offer safe sharing of the scarce airspace.

It is a real disappointment to read that the sponsor felt that the standard 12 week engagement was excessive considering the huge implications these TDAs have on GA in the area and the clear lack of understanding which has been shown to the current use of this airspace.

From: [REDACTED]
Sent: 19 January 2021 15:26
To: [REDACTED]
Cc: [REDACTED]
Subject: Re: UAS BVLOS in Segregated Airspace (Oban-Isle of Mull-Coll)

Hi [REDACTED]

Please find attached my response to the above subject.

Kind regards,
[REDACTED]

On Tue, 12 Jan 2021 at 15:44, [REDACTED] wrote:

Hi [REDACTED]

Thanks for this, I have updated our list accordingly.

Kind regards,
[REDACTED]

From: [REDACTED]
Sent: 12 January 2021 15:15
To: [REDACTED]
Cc: [REDACTED]
Subject: Re: UAS BVLOS in Segregated Airspace (Oban-Isle of Mull-Coll)

Hi [REDACTED]

Thank you for your email. I initially got [REDACTED] email address from the CAA.

I am a GA pilot and don't represent any company or organisation. Please add me to your list.

Kind regards,

[REDACTED]

On Tue, 12 Jan 2021 at 14:57, [REDACTED] wrote:

Dear [REDACTED]

Thank you for your email which has been forwarded to me by my colleague [REDACTED]. I have attached the stakeholder engagement material sent out yesterday which details the proposed drone operation, you can reply directly to this email if preferred.

To ensure you are included in all future communications regarding this airspace change can you confirm which company you represent or if you are a GA pilot and I will add you to our stakeholder list.

Kind regards,

[REDACTED]
[REDACTED]

skyports.net



From: [REDACTED]
Sent: 11 January 2021 19:55
To: [REDACTED]
Subject: UAS BVLOS in Segregated Airspace (Oban-Isle of Mull-Coll)

Hello,

I am a GA pilot who often flies in and around the area of the above proposed TDA. Is there a consultation which will allow input from the GA pilot community as part of this process? If so can you advise me of the process in order to engage with the consultation?

Kind regards,

[REDACTED]

Response 42: Individual D

From: [REDACTED]
Sent: 15 January 2021 16:56
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: ACP-2020-099 Oban-Isle of Mull-Coll

Hi [REDACTED]

Yes absolutely it all about close communication and in all honesty it has been great to understand all your concerns and hopefully we can find a solution. As mentioned we plan to send out revised routings and suggestions early next week based on all stakeholder feedback.

In response to your addition points below:

- To ensure flexibility is given to support the NHS we would potentially need to be available on the day for a given TDA. If it is foreseeable that weather will deteriorate we may only operate for half the day, however all activity will be promulgated by NOTAM, which will state hours of operation and a contact number for us. FYI this drone has a cruise speed of 60kts (70mph), and I also hope to share more details about how a specific route could look on a given day next week.
- Regarding Glenforsa we are currently amending our route to be further away from this airfield and I hope to have a revised route around this section next week.
- Your point about night flights has been notes, thank you. I have fed this back to the team and given the rapid response/capability required and the limited opening hours of hospitals, the use of drones in this instant would be less beneficial.

Look forward to catching up with you next week.

Kind regards,

[REDACTED]

From: [REDACTED]
Sent: 15 January 2021 00:33
To: [REDACTED]
Subject: RE: ACP-2020-099 Oban-Isle of Mull-Coll

Hi [REDACTED]

Thanks for responding.....this whole process is about close communication I guess.

Although you say TDAs will be notified 24 hours in advance you don't indicate how long they will last. Oban to Tobermory and on to Coll is approximately 50 miles. Your drone flies at 40mph so it's around 1 ¼ hour each way. Does this mean you will book the TDA for a 3 hour window (there and back with a few minutes for stops) or are you planning to set up TDAs for the whole day?

The corridor for the TDA along the sound of Mull would seriously impede flying into, out of and around Glenforsa Airfield for the GA community and I'm sure you will receive a massive pushback if that is maintained. Whilst we have to share the airspace with other users it's on a "see and be seen" basis and your drone doesn't "see".

Apart from flying at night I don't see how you would overcome this problem but I'm happy to be proven wrong as I can see the benefits of your operation to the islands.

I look forward to your comments.

Kind Regards

[REDACTED]
[REDACTED]
E-mail: [REDACTED]

From: [REDACTED]
Sent: 14 January 2021 19:38
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: ACP-2020-099 Oban-Isle of Mull-Coll

Hi [REDACTED]

Thank you for these comments, this is very useful feedback. We plan to review all feedback and get back to all stakeholders with suggestions/amendments for this area early next week. Your suggestion of night flights has been noted and thank you for the detail on frequency of traffic in this area and potential risk of microlight activity who operate without transponders.

Regarding the NOTAM, it will be issued 24hrs before any planned flights detailing which TDAs will be active and between what times and will also include a contact number for airspace users to get in touch with us. All TDAs not in use will be deactivated.

Kind regards,
[REDACTED]

From: [REDACTED]
Sent: 14 January 2021 10:02
To: [REDACTED]
Subject: RE: ACP-2020-099 Oban-Isle of Mull-Coll

Hi [REDACTED]

Thanks for the reply. My interest in this issue is as a GA pilot.

I suspect you underestimate the level of GA traffic around Mull, particularly in the summer. Please let me give you an insight from a GA pilot.

The West coast of Scotland has few available airfields but is some of the best flying in the UK. Oban and Glenforsa are potential stop offs en route further north and I often use Glenforsa as a base from which to tour the Western Isles. Glenforsa has the lure of a nice restaurant, bar and accommodation..... all of which add up to a great place to stop. I fly a light aircraft but am often accompanied by fellow pilots in microlights including both flexwing and three axis aircraft.

There is no legal requirement for aircraft to carry transponders or even a radio for that matter, particularly in uncontrolled airspace, which is where you plan to fly your drones. Consequently, I see a high risk that a microlight or light aircraft could be seriously endangered by a drone flying blind. Hitting a bird in flight can be very dangerous, so hitting a 14kg drone would likely be disastrous.

The TDA information does not give any indication as to how long it will be established for so it's hard to be objective about it. If only lasts for an hour or so then it may be possible to work around but I am aware that other similar TDA's are established for 24 hours and for several days at a time. This would be impossible to comply with whilst

working around the vagaries of the West coast weather (there may be a small weather window which the TDA's may interrupt.

One very simple solution would be to fly the drones at night when there is virtually no GA traffic and no movements at Glenforsa as it has no runway lights. If the drone is fitted with a strobe or similar it would be very visible in the darkness.

I look forward to receiving some clarity and will be keen to comment on any future consultations.

Kind Regards

[Redacted]
[Redacted]
Mob: [Redacted]
E-mail: [Redacted]

From: [Redacted]
Sent: 12 January 2021 15:38
To: [Redacted]
Cc: [Redacted]
Subject: RE: ACP-2020-099 Oban-Isle of Mull-Coll

Dear [Redacted]

Thank you for your email and raising your concerns with us. To ensure you are informed of any future communication regarding this airspace change can you please confirm which organisation you represent or whether you are a GA pilot. I will then add you to our list of stakeholders.

I have attached our stakeholder engagement material that was sent out yesterday which should give you more detail around the proposed routes.

In answer to your comments below:

We are in discussion with Glenforsa Airfield around this specific route (Craignure-Tobermory) which could affect traffic in this area and will advise of any amendments made based on this engagement. Your concerns are noted with regard to circuit pattern and we will explore all options to maintain a safe distance.

For additional information this is a 5 week project starting 8th April to support the NHS in their COVID-19 response. Notification of active TDA will be via NOTAM 24hrs before intended flight; with TDAs not in use deactivated to ensure airspace is still accessible. Our drone also has electronic conspicuity and equipped with ADS-B IN & OUT to further enhance situational awareness.

Kind regards,

[Redacted]
[Redacted]
skyports.net



From: [REDACTED]
Sent: 11 January 2021 20:42
To: [REDACTED]
Subject:

Hi [REDACTED]

I have seen your proposals for danger areas around Mull and find it unbelievable that you plan to fly unmanned drones right through Glenforsa's ATZ. Whilst its quiet in the winter its a busy general Aviation airfield and flying drones so close at virtually the same height as the circuit pattern is little short of ludicrous.

Your plans need a total rethink unless you can offer some insight into a way go avoid a serious mid air collision?

[REDACTED]
[REDACTED]
[REDACTED]

Response 43: Individual E

From: [REDACTED]
Sent: 16 January 2021 13:02
To: [REDACTED]
Subject: RE: Re drone proposal Oban

Thank [REDACTED], I have added to list.

Kind regards,
[REDACTED]

-----Original Message-----

From: [REDACTED]
Sent: 16 January 2021 11:41
To: [REDACTED]
Subject: Re: Re drone proposal Oban

[REDACTED]
Thanks for your response.

We have a plane based at Oban- my husband is the pilot. We are a member of Connel Flying Club which has a hangar with 11 light aircraft/microlights.

If you could add the club to the stakeholder list that would be great.
[REDACTED]

For your info, there are 2 other flying clubs, both with hangars at the airfield - Connel Gliding Club (actually microlights) and Argyll Aero Club.

Regards
[REDACTED]

Sent from my iPhone

> On 13 Jan 2021, at 13:34, [REDACTED] wrote:

>

>

> Good afternoon [REDACTED]

>

> My colleague [REDACTED] has forwarded me your email. Thank you for your email and support of the project. Your experience of the region and feedback provided is much appreciated and we are already looking to propose a different routing around Glenforsa Airfield to avoid circuit patterns and other potential VFR traffic, based on your and other stakeholder feedback. I will hopefully be able to share something next week on this.

>

> I have attached our stakeholder engagement documentation and will add you to our list of stakeholders to ensure you are included in all future communications regarding this airspace change. Would you be so kind as to share the organisation/company you represent or if you are a GA pilot?

>

> To highlight some points contained within the document:

> Drone operations are planned to take place for a 5 week period from 8th April during daylight hours. The exact route to be used and timings for a particular day are currently unknown at this stage, however all information will be promulgated via NOTAM 24hrs before, with a contact number for Skyports (this number can be used by yourself to contact us to potentially arrange any crossing, in this instance the more notice you can give the easier it will be to coordinate this). TDAs not in use will be deactivated to ensure airspace is still accessible. The diagram provided in the documentation is an overview of all routes, with only one or two being flown on any particular day.

> Hopefully we can amend our routing to avoid you having to contact us completely, however wanted to share our contingencies regardless.

>

> I hope this makes things a bit clearer and do get in touch should you have any further questions.

>

> Kind regards,

> [REDACTED]
> [REDACTED]

> skyports.net

>

>

>

>

>

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> -----Original Message-----

> From: [REDACTED]

> Sent: 12 January 2021 18:20

> To: [REDACTED]

> Subject: Re drone proposal Oban

>

> Overall I think it's great that you are doing this sort of trial, and the West Coast is an ideal location for testing. However as an operator of a private aircraft out of Oban, and a regular user of Glenforsa Airfield on Mull I am concerned about the impact your proposed routing will have on the operations of Glenforsa, and our ability to land there.

>

> Looking at the routing it looks like it will be impossible to land at Glenforsa without busting your drone corridor - as an established airfield, with an established circuit pattern from ground to 1000ft, surely you should take this into consideration when planning your routing - you can't just effectively close it down for the duration of your trial. How are you going to allow safe access to Glenforsa?

>

> Regards

> [REDACTED]

>

>

> Sent from my iPad

> <ACP-2020-099 Skyports - Oban-Mull-Coll - Targeted Av Stakeholder Eng Material.pdf>

Response 44: Individual F

From: [REDACTED]
Sent: 14 January 2021 21:27
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Contact email address
Attachments: ACP-2020-099 Skyports - Oban-Mull-Coll - Targeted Av Stakeholder Eng Material.pdf

Hi [REDACTED]

A pleasure to speak with you today and thank you for getting in touch. I have now added you to our stakeholder list and will keep you informed of all future communications regarding this airspace change. I have also attached our stakeholder engagement material regarding this ACP for your perusal. Some highlight of our conversation are below, please amend if inaccurate:

- * The area in Glenforsa is a highland low level tactical area with low flying military jets.
- *Glenforsa is an active traffic area from April for many members of the GA community who don't always use electronic conspicuity. The current TDA near Glenforsa will restrict access to this airfield.
- *Steve Slater at LAA (Light Aircraft Association) is the best contact to use to inform/reach out to the GA community. FYI I have checked and he is on our stakeholder list as was contacted 11/01. Thank you for this information.
- *Glenforsa has a safety com radio frequency that could be used, given the poor VHF communications in this area. You informed us that it should only be used when airborne. Thank you for this feedback.
- * Aviation magazines could be used in the future to improve stakeholder engagement at no cost (Highland News was suggested also). This is a great suggestion and has been feedback to our team.

Once again it was a pleasure to talk to you [REDACTED] and as discussed I hope to be in touch early next week with new suggestions based on all stakeholder feedback, including yours.

Kind regards,

[REDACTED]
[REDACTED]

skyports.net

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-----Original Message-----

From: [REDACTED]
Sent: 14 January 2021 17:13
To: [REDACTED]
Subject: Contact email address

Response 45: Individual G

From: [REDACTED]
Sent: 01 February 2021 08:14
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: ACP-2020-099 - Formal Stakeholder Objection

Thank you. On a personal note, I really appreciate the prompt comms throughout.

I wish you all well for the future.

Take care, [REDACTED]

From: [REDACTED]
Sent: 01 February 2021 08:09
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: ACP-2020-099 - Formal Stakeholder Objection

Hi [REDACTED]

Thank you for your response, I can confirm this has been received. We appreciate the time you have taken to share this feedback.

Kind regards,
[REDACTED]

From: [REDACTED]
Sent: 31 January 2021 17:57
To: [REDACTED]
Cc: [REDACTED]
Subject: ACP-2020-099 - Formal Stakeholder Objection

Good afternoon [REDACTED]

Following on from my earlier responses to ACP, I regrettably need to record my formal objection. I do acknowledge Skyports efforts to address the GA community's concerns in several updates resulting in the current Version 3 but I believe several important issues remain unresolved. In addition, the latest version was only released at close of play on Thu 28 Jan, giving just one working day for National Bodies to coordinate a response. This added to the perception that the ACP has been rushed and the original was ill-conceived.

I fully accept that drones will play an increasingly important role in society. Integration rather than segregation is the goal but I accept that may be a little way off.

However, I strongly believe that current integration of drones into UK airspace via a TDA should be proportionate, fully justified and subject to full stakeholder consultation to minimise its impact on other airspace users. I believe the ACP in its current form fails these tests.

Process, justification and stakeholder engagement

I understand the CAA accepted a reduction in the consultation process from 12 weeks to 2 weeks (subsequently extended to 3) based upon a supposed medical imperative, supported by Skyports claim that as a result of previous ACP submissions, *'Skyports developed a comprehensive picture of airspace usage in that area'*.

During the past few weeks the medical justification has been challenged as it appears to be more of a proof of concept trial rather than urgent medical operational support as part of the ongoing Covid effort.

What cannot be in doubt is that the claim of *'Skyports developed a comprehensive picture of airspace usage in that area'* is demonstrably factually incorrect.

The exceptionally limited consultation in previous West Coast ACPs was fatally flawed and is now subject to challenge by individuals and National Bodies with the CAA. One example of how ACP 2020-055 may have been challenged is that you have dropped the Easdale TDA in this ACP after consultation yet it of course remains as TDA2 in 055.

Further, the general tone of the ACP throughout looks to provoke an emotional response, often against the background of the Covid emergency. This isn't helpful or professional. One such example statement lacking justification or evidence; *'In the event of an emergency that requires the SUA to be grounded immediately while in the constrained leg, the remote pilot will have no option but to land in the sea, resulting in the total loss of technology and payload.'*

Operational Issues

I believe the overall activation and operation of the TDA remains vague and I am yet to be convinced that your DACS proposal is operationally viable. Efforts to instigate a Danger Area Crossing Service (DACs) by phone may be laudable but I would like confirmation that the CAA will allow aircraft to enter a TDA that has been activated by NOTAM on the basis of a phone-call. As you will be aware, this is vitally important as we leave ourselves open to prosecution if we enter an active TDA without authority. Further, I may arrive in the area after a transit of several hours and be out of radio contact for large periods. Radio Line of Sight remains a fundamental challenge to an effective DACs and again, I see no viable solution in your current proposal.

You state that the UAS will only operate VFR and when cloud base is above 1500ft as forecast by windy.com. Again this is somewhat vague and the West Coast weather will vary enormously from the forecast and as you fly, will often vary wildly from one end of the Sound of Mull to the other for example. I'm not entirely clear how, when operating BVLOS, you account for this?

Lastly, we haven't seen any real performance data to support the operational requirement for 2km wide corridors. I understand other stakeholders have been informed that it is commercially sensitive but again that doesn't really help the community understand the requirement. On that note, may I suggest you use a recognised aviation chart when presenting an ACP?

Summary

In sum, I appreciate you are a commercial operator contracted to provide some sort of proof of concept trial to look at the viability of NHS support. From press releases, I also realise you have future aspirations to deliver routine post to remote locations on the West Coast. But commercial pressures should not circumvent established processes to ensure ACPs are justified, proportionate and fully scrutinised. In this case and your previous West Coast ACPs, I strongly believe the established process has been circumvented and as a result, I suspect there is potential for a real breakdown in trust between Skyports and the GA

community. I do hope that the ACP is withdrawn until operational issues can be fully resolved and that the community can be given sufficient time to make a considered response. I do look forward to a resolution that enables us to share the air, with both parties retaining maximum operational flexibility.

Best regards,

████████████████████
████████████████████
████████████████████

From: [REDACTED]
Sent: 16 January 2021 12:57
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: ACP-2020-099 (Oban-Isle of Mull-Coll)

Thanks [REDACTED] Have a good weekend.

VBR, [REDACTED]

From: [REDACTED]
Sent: 16 January 2021 12:55
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: ACP-2020-099 (Oban-Isle of Mull-Coll)

Hi [REDACTED]

No problem and thanks for the additional feedback. I hope to be in touch again next Wednesday with these revisions/suggestions.

Kind regards,
[REDACTED]

From: [REDACTED]
Sent: 15 January 2021 17:32
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: ACP-2020-099 (Oban-Isle of Mull-Coll)

Thanks [REDACTED] I really do appreciate the prompt comms.

The possibility of half a day activation for individual TDAs I think would see many of us escalate to formal objection I think.

For example, it would effectively close Glenforsa if the current routing is maintained. But it's not solely Glenforsa that concerns me. Keeping above 1000ft in the Easdale TDA when base is lower for a full 12 hour period has potential to severely impact our flying also. I would have said the same regarding the Crinan Canal/Lochgilphead TDA had I been given the chance.

So I am yet to be convinced but I am keen to give you an opportunity to review prior to the consultation closing.

For me aside from Glenforsa routing, a mechanism to reduce activation times so we can continue to operate with flexibility is the key to all this.

I sincerely hope a solution can be reached. Good luck and I look forward to hearing more.

All the best and I hope you get time to enjoy your weekend!

[REDACTED]

From: [REDACTED]
Sent: 15 January 2021 17:14
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: ACP-2020-099 (Oban-Isle of Mull-Coll)

Afternoon [REDACTED]

Thanks for this additional insight and we fully take onboard your points about timings regarding TDA activation, duration and operational flexibility.

Given the rapid response/capability required by the NHS and the limited opening hours of hospitals, the active TDA is likely to be during the day to give this operational flexibility that you are aware of. That being said we are looking to find a way to reduce these activation periods (half a day when it is foreseeable the weather will be poor etc) and I hope to get back to you next week with some revised routing and suggestions.

On the ADS-B point our Head of Tech has advised me that as long as your aircraft had ADS-B IN our drone will be picked up, but we are not using this as a strategic mitigation, hence the creation of the TDA as currently mandated by the CAA.

I fully agree with trying to maintain operational flexibility on both sides and look forward to catching up with you next week.

Enjoy the weekend and kind regards,

[REDACTED]

From: [REDACTED]
Sent: 15 January 2021 11:15
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: ACP-2020-099 (Oban-Isle of Mull-Coll)

Good Morning [REDACTED]

Many thanks for prompt response, there's huge interest in this amongst our wider community now we finally have sight and I'm sure you will be busy answering many concerns.

Two quick follow-ups if I may;

Timings. Many of us are trying to get a feel for the impact. You say TDAs will be inactive outside of active ops. That could of course mean anything from activating the TDA for the full day on a day of operations down to a full morning or afternoon. Having spent my entire professional life in military air ops, I get operational flexibility but am hoping you will activate the individual TDAs for perhaps an hour or so around the transit? Any feel for that?? What people often don't get about leisure flying is that we set off with only a very broad plan of say going to Glenforsa via Bute airfield...routing is flexible and timings depend on who we see / how long we spend in the Kingarth pub on Bute having brunch. So our schedule is very vague as it's a fun day out of course. Having said that if we know you are operating 1200-1300 in the Glenforsa TDA then we can avoid. What gets harder is if you for example block it out all afternoon. Long-winded but I hope you can see our concern - there is certainly nervousness that no matter what informal assurances are provided, once the TDA is approved, you have full control about how you apply timings.

ADS-B. Techie one, most LAA and BMAA aircraft transmit ADS-B SIL=0. Some certified systems filter SIL=0 responses out, not sure how your drone will handle that. One for you to be aware of.

Thanks again. I'm going to put together a news piece for Microlight Flying and am in close touch with Flyer too. I hope there are some real outcomes / amendments from the wider consultation which mean we can share the air maintaining whilst maximum operational flexibility on **BOTH** sides.

All the very best , [REDACTED]

From: [REDACTED]
Sent: 14 January 2021 20:57
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: ACP-2020-099 (Oban-Isle of Mull-Coll)

Hi [REDACTED]

Thank you for taking the time to respond to us regarding ACP-2020-099. I have now added you to our stakeholder list and also attached the stakeholder engagement material for you. In response to your comments:

- Glenforsa – Yes we are in touch with Mr Walsh and acknowledge this airfield is in use (from April 2021) and will require us to do some further analysis. Our initial analysis was based on the airfield being closed until 15th July (from website), however we have been informed this is information is from 2020 and requires updating. Hopefully we will be able to share some suggested amendments early next week, based on all stakeholder feedback including yours.
- GA Aircraft operating <500ft – this is all noted and understood, thank you for this feedback.
- DAAIS/DACS – We currently have a Temporary Operating Instruction (TOI) with HEMS operators whereby Scottish Information/Oban Information will contact us on behalf of HEMS if they are re-tasked once airborne. We are currently still in talks with NATS. Our NOTAMS will be issued 24hrs before any planned operation stating times, active TDA and our contact number. If access is required generally the more notice the better so we can coordinate accordingly. Please also note that TDAs not in use will be deactivated to ensure airspace is still accessible.
- ADS-B – Yes our drone is equipped with ADS-B IN & OUT.
- Lochgilphead ACP last summer – This ACP had an engagement period of 6 weeks. The shorter engagement period this time has been agreed with the CAA given our previous engagement in this region, and the nature being in response to COVID-19, however I do understand your frustrations and rest assured we have your details and will include you in any further communication regarding this airspace change. We can be flexible where reasonably practical to accommodate later responses, please let me know if this is the case.

This response can be taken as your formal response, thank you. As mentioned above I hope to be in touch early next week with any suggested revisions based on all received feedback.

Thank you once again Paul, and that is an awesome picture by the way.

Kind regards,
[REDACTED]

From: [REDACTED]
Sent: 14 January 2021 10:06
To: [REDACTED]
Cc: [REDACTED]
Subject: ACP-2020-099 (Oban-Isle of Mull-Coll)

Good Morning.

I am a fixed wing microlight pilot of an Evektor Eurostar based at Eshott in Northumberland and regularly fly on the West Coast of Scotland; often organising trips for up to 5-15 aircraft. For full-disclosure, I am also a reporter for the BMAA house magazine 'Microlight Flying' and regular freelance contributor to 'Flyer' magazine.

I'd like to provide feedback on your application to operate UAS on the West Coast – I'm not sure if you have a more formal feedback process?

Glenforsa. Having been in touch with operator Brenden Walsh, I understand that you are now aware that the airfield sees tens of movements during flyable days 1 April to end October with maybe over 100 per day during fly-in events. It does concern me that there is no acknowledgment of this popular and busy airfield in any of the maps in your presentation when you propose to operate the UAS within the Glenforsa circuit. Clearly this routing needs to be amended.

GA aircraft operating below 500ft AGL. West Coast weather is unpredictable and subject to many localised weather phenomena. As we are strictly VFR, we regularly take advantage of the flexibility of the 500ft Rule 5 (which allows us to operate 500ft from any person, vessel, vehicle or structure laterally as well as vertically) to operate below 500ft AGL. For example, if departing Glenforsa or Coll when fog has lifted into low stratus to say 500ft but there is good visibility and it is clear further down the sound /at Oban, then we may fly low-level to an area of better weather to continue. TDAs will undoubtedly restrict our operational flexibility and safety. For your wider situational awareness, when routing from the Glasgow-Prestwick gap to Mull or Coll via Bute, Lochgilphead and the Crinan canal, we will generally operate as a loose formation at around 500ft AGL except for crossing the Sound of Mull when we will climb to around 2000ft. Sight-seeing flights around Mull and Coll are generally made at 500ft AGL and occasionally below where Rule 5 permits.

DAAIS / DACS comms. You'll be aware that operating low-level on the West Coast of Scotland, many areas are beyond Radio Line of Sight and we are routinely out of communication with Scottish Info from the north of Bute all the way to about 10 miles south of Oban. I'm not sure what or if any arrangements for a DACS will be made but I assume it will be pure time de-confliction due to the challenge of radio comms?

ADS-B. Many of us are equipped to ADS-B receivers but some aren't – some us transmit ADS-B out also (SIL=0). I understand the UAS will transmit also?

In sum, I appreciate that UAS will play an increasing role in our society. But we must make sure TDAs are justified, proportionate and that stakeholders are fully consulted. As a regular user of the airspace, I was exceptionally disappointed to discover the Lochgilphead ACP was out for only 2 weeks consultation last summer with minimum of consultation / publicity. To be frank it doesn't inspire confidence in the wider flying community who are already suspicious of your long-term intent to grab large swaths of airspace.

Lastly, I do hope these TDAs will only be active for transits instead of being blocked out for hours /days on end which would severely reduce our operating flexibility/safety and would go against the CAA's vision of 'share the air'.

I will be forwarding my comments to eh BMAA, GAA, Flyer and other interested stakeholders - please let me know if I need to submit them more formally. I have attached a picture of our group at Glenforsa to give a flavour of our aircraft operating at low-level.

Many thanks for your time and please get in touch if I can amplify further.

All the best, [REDACTED]
[REDACTED]
[REDACTED]

Response 46: Individual H

From: [REDACTED]
Sent: 23 January 2021 11:12
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Version 2 ACP-2020-099 Oban-Mull-Coll Targeted Aviation Stakeholder Engagement Material

Morning [REDACTED]

Thank you for your response and your 'no objection' has been noted. I understand our operating altitude to be above that of ships, however I will feed this back to our flight ops team to ensure this is the case (specifically Glensanda Quarry Bulkers).

Kind regards,
[REDACTED]

From: [REDACTED]
Sent: 22 January 2021 14:17
To: [REDACTED]
Subject: Re: Version 2 ACP-2020-099 Oban-Mull-Coll Targeted Aviation Stakeholder Engagement Material

Thanks. No objections.

PS. I don't know how your drone operates, but would encountering a very large ship affect it? I'm thinking of the Glensanda Quarry bulkers which use the Sound of Mull.

On Fri, 22 Jan 2021, 13:42 [REDACTED] wrote:

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) which 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:

Response 47: Individual I

From: [REDACTED]
Sent: 16 January 2021 13:11
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: ACP-2020-099 (Oban-Isle of Mull-Coll)

Hi [REDACTED]

Thank you for this additional information. I believe Brendan Walsh referred to this as a 'bomber circuit.' The information about radio comms is also noted.

Look forward to catching up on this next Wednesday.

Kind regards,
[REDACTED]

From: [REDACTED]
Sent: 16 January 2021 12:19
To: [REDACTED]
Cc: [REDACTED]
Subject: Re: ACP-2020-099 (Oban-Isle of Mull-Coll)

Thank you for your prompt response.

I am a GA pilot that flies frequently in the west coast of Scotland from my base in Strathaven, south of the Glasgow zone.

I do not represent an organisation, but I do know my concerns are representative of the local flying community.

Even when Glenforsa airfield is closed, I have permission from the owner to land for a short rest break; this applies to many local pilots that frequent the area. Thus GA flights may be more frequent than you expect once we move from tier 4 restrictions.

It is common for approaching aircraft to make a wide circuit for 08 or departing aircraft on 26 to make a low wide circuit to the north to allow for incoming aircraft to perform an extended final approach.

Wind conditions are highly variable around the airfield resulting in high pilot workload and likelihood of extended circuits and limited time to check for drones. Radio use is normally well disciplined to aid separation, again a drone awareness imitation.

I hope this helps in selecting a route local to the airfield.

Best regards,
[REDACTED]

On Sat, 16 Jan 2021, 11:27 [REDACTED] > wrote:

Dear [REDACTED]

Your email to the CAA has been forwarded to me by the airspace change team. Would you be so kind as to sharing the organisation/company you represent or whether you are a GA Pilot? I have attached the stakeholder engagement material for this ACP and now included you in our list of stakeholders and will ensure any future communications regarding this ACP are shared with you. Please also note that any communications with us are shared with the CAA at the end of the engagement period in a summary report, so feel free to communicate with us directly going forward.

I am of course happy to answer your questions below as best as possible:

- Glenforsa airfield and localised weather – Thank you for this feedback. At the time of our initial route analysis it was stated this airfield would be closed until 15th July, however we are now in touch with the person who runs this airfield and understand this information was from 2020 and requires updating. We are in the process of revising our routing further away from this airfield and I hope to share some revisions and suggestions next Wednesday.

On the localised weather point we have kept our routing as close to 400ft AGL where possible. All altitudes depicted are AMSL and may have variations due to terrain heights.

- NOTAM/Semi-permanent restriction – Thank you for the feedback on the semi-permanent restriction, we will look closer at this and see if it is more feasible to incorporate. Currently NOTAMs will be issued 24hrs before any planned flights detailing which TDAs will be active and between what times and will also include a contact number for airspace users to get in touch with us. All TDAs not in use will be deactivated in ensure airspace is still available to all users. It is envisaged only one or two route will be active at any given time.
- Contact/Communications – As mentioned above a contact number will be included in our NOTAM (if you do have a planned sortie which our active area may affect, the more notice you can give the better so we can coordinate accordingly). For information we currently have a Temporary Operating Instruction (TOI) with HEMS operators whereby Scottish Information/Oban Information will contact us on behalf of HEMS if they are re-tasked once airborne. We are currently still in talks with NATS.

I hope this answers some of your concerns and I hope to get back to you on Wednesday with revised routing and suggestions based on all stakeholder feedback, including yours. Thank you very much for this information Ross.

Enjoy the weekend,

Kind regards,

Response 48: Individual J

From: [REDACTED]
Sent: 16 January 2021 12:01
To: [REDACTED]
Cc: [REDACTED]
Subject: ACP-2020-099 UAS BVLOS (Oban-Isle of Mull-Coll)
Attachments: ACP-2020-099 Skyports - Oban-Mull-Coll - Targeted Av Stakeholder Eng Material.pdf

Dear Mr [REDACTED]

Your email to the CAA has been forwarded to me by the airspace change team. Would you be so kind as to sharing the organisation/company you represent or whether you are a GA Pilot? I have attached the stakeholder engagement material for this ACP and now included you in our list of stakeholders and will ensure any future communications regarding this ACP are shared with you. Please also note that any communications with us are shared with the CAA at the end of the engagement period in a summary report, so feel free to communicate with us directly going forward.

I am of course happy to answer your questions below as best as possible:

- TDA creation – We are following the CAA rules very closely which state that until UAS can comply with the requirements for flight in non-segregated airspace, BVLOS UAS flights outside permanently established segregated airspace may be accommodated through the establishment of segregated airspace on a temporary basis. Your views about TDA creation and potential disruption to other airspace users are noted and align with both our and the CAA long term plans to evolve this, however for now we need to work within the current regulation. Your suggestion of a 'on demand' TDA activation has been noted, thank you.
- Glenforsa airfield and localised weather – Thank you for this feedback. At the time of our initial route analysis it was stated this airfield would be closed until 15th July, however we are now in touch with the person who runs this airfield and understand this information was from 2020 and requires updating. We are in the process of revising our routing further away from this airfield and I hope to share some revisions and suggestions next Wednesday.
- ADS-B – The drone vehicle we are using has ADS-B IN & OUT capability and I understand it to be able to be picked up by any aircraft with ADS-B IN capability. Please note that this is not a strategic mitigation and only used by us to improve situational awareness, we will always be operating within our active TDA. It has been suggested by another stakeholder that we include this information on the NOTAM, which is what we intend to do.
- Contact/Communications/Poor Comms – A contact number will be included in our NOTAM (if you do have a planned sortie which our active area may affect, the more notice you can give the better so we can coordinate accordingly). For information we currently have a Temporary Operating Instruction (TOI) with HEMS operators whereby Scottish Information/Oban Information will contact us on behalf of HEMS if they are re-tasked once airborne. We are currently still in talks with NATS and your suggestion of a DACS has been noted.

We sincerely appreciate your support of the project and taking the time to provide us with this very very constructive feedback. It does seem that we are very much aligned on many points (which are inline with CAA long term goals) and I'm happy to have a call with you next week if you like, however hope to have a revision out next Wednesday.

Enjoy the rest of the weekend,

Kind regards,



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Whilst I support the use of airspace for potential BVLOS operations in principle, the creation of a Temporary Danger Area does not seem an appropriate solution and would considerably disrupt well-established General Aviation operations in the area.

The proposed area would interfere with traffic in the circuit at Glenforsa and prevent low level navigation around Mull, as well as disrupting approaches to Oban from the south. The proposed area would appear to include areas outside of RT coverage with Oban (who would presumably be able to offer a DACS)

The proposal appears not to mandate the use of ADS-B on the UAS. At a time when you're actively encouraging General Aviation to use EC devices for conspicuity and for traffic information in the cockpit, and recognising the proliferation of other types of airspace users such as UAS in the future, it seems irresponsible and inappropriate to not mandate the inclusion of such EC on any unmanned operations in the area. The presence of which would give valuable information to pilots operating in the area.

I would suggest that a simple NOTAM of such operations is sufficient, relying on the fundamental "see and avoid" principle of all VFR operations in VMC, with the addition of Electronic Conspicuity to improve situational awareness, and that both pilots of manned aircraft and of the UAS can remain responsible for their separation from other traffic.

I welcome the innovation in the UAS space, and increased use of them for uses like this, but commercial interests and unmanned traffic should not be at the cost of "squeezing" other, more established, users out of the airspace system. I fully expect that different forms of aviation can integrate safely without the need for the Temporary Danger Area proposed in this instance. In the event that this proposal is implemented it is imperative that it is carried out in accordance with CAA Policy for the Establishment of Permanent and Temporary Danger Areas, specifically the requirement for the operation times to be "minimum practicably necessary to carry out the task for which the DA has been established"

Given the very specific nature of these routes for UAS traffic, I would suggest that a derogation from the usual requirement of a 24 hour notification period may be considered appropriate, with airspace activated "on demand" to facilitate these flights, with a shorter notice period but their activation being promulgated by NOTAM, Oban AFIS, and Scottish Information as appropriate. It is unnecessary and disproportionate to 'cut up' swathes of uncontrolled airspace in this manner for occasional short flights by a commercial UAS operator

Response 49: Individual K

From: [REDACTED]
Sent: 31 January 2021 12:11
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Objection to ACP-2020-099

Hi [REDACTED]

Thank you for these additional comments, they have been noted together with your objection. I have tried to explain some of the technical features of the drone below in addition to your other points:

- The VTOL (Vertical Take-off & Landing) capability is reserved to only support take-off and landing, not to support manoeuvres during flight. It runs on a separate battery system than the battery system uses for forward flight in fixed-wing mode for safety reasons and has been designed to support normal take-offs, aborted take-offs and any other scenario that would require it to hover for a certain amount of time in order to land safely again (e.g. an emergency landing). The system is not designed by the manufacturer for use during forward flight apart from facilitating an emergency landing. It unfortunately can't stop and then turn within a constrained leg. You are accurate in that once it has left the constrained leg it can then turn.

The constrained leg design functionality was designed by the manufacturer to enable the drone to fly below 400ft through mountainous regions. This functionality enables us to plot a route that stays well clear from other aircraft without running the risk of an orbit or RTH being triggered and the drone hitting a mountain ridge as it is making a turn. Working with the OEM, we've worked out a means of introducing a constrained leg, which is actually safer even if it does limit our options, for the following reasons:

- When using a constrained leg, we cannot execute an orbit in the event of the ADS-B picking up the presence of another aircraft should one enter segregated airspace.
- By operating within a constrained leg we take up as little space as possible. The SUA has a small corridor that it will navigate through but will automatically trigger an emergency land if it determines that it has breached that corridor.

Hopefully this explains why the whole route cannot be a constrained leg.

- We also fully agree in integration rather than segregation, and believe this to be the CAA medium/long term plan. Currently we have to operate within the rules which state, until UAS can comply with the requirements for flight in non-segregated airspace, BVLOS UAS flights outside permanently established segregated airspace may be accommodated through the establishment of segregated airspace on a temporary basis. We are working with the CAA in their sandbox on a separate project to explore this however this ACP is in response to the current pandemic.

I will need to get back to you on the weather question.

Kind regards,

[REDACTED]

From: [REDACTED]
Sent: 30 January 2021 17:55
To: [REDACTED]
Cc: [REDACTED]
Subject: Objection to ACP-2020-099

Hi [REDACTED]

In addition to my previous email I would like to add the following comments to my objection to this ACP following your revisions.

I Welcome your use of a "constrained route in the area passing Glenforsa airfield but I don't understand why an "emergency" can't allow the drone to continue along its route and land at destination, or land at some intermediate point on the route, or continue to the end of the constrained part and then do the turn around. But what I really don't understand is how is the drone capable of being landed in a confined area if it can't slow down and turn around on one of these constrained routes. I know nothing about drones but I thought they were capable of hovering and turning very tightly at slow speed.

I really think the whole route network should be constrained routes, if it can deliver a package within a meter or so, why can't it fly along a route a few meters wide? Ok perhaps a 100m wide track to give room for collision avoidance. This could be along the coast so as to give the rest of the area above the water back to everyone else

I think the TDA should be a blanket 400ft AGL, with no mention of AMSL. Particularly in the wide areas, then this allows your drones to fly up to 400ft AGL over an obstacle, but it means those parts of the wide TDA that are over water are only at 400ft, not some higher height. Thus then GA and other fliers know that if they keep at 400ft or above over any water they are safe, not just from the drones, but from any infringement of the TDA. This is a much better solution than having various random heights above the water, depending on the height of the ground a mile or two away.

We welcome the idea that you will inform people when the TDA is inactive, but this needs to be formalised so that the TDA is officially deactivated for a period of time. There needs to be a procedure agreed with the CAA to cover this, because next thing is they will be prosecuting people for infringing the TDA even though Skyport said it was inactive.

Similarly we welcome the statement that you won't be flying when the cloud base is 1500ft or below, again this need to lead to formal deactivation of the TDA, so that all the local operators and airfield know. It's also not clear what criteria you will use, will it be that if any forecast time period in the next day is forecast to be below 1500ft you will cancel for the whole day, or just for certain time periods? And what about if the weather is not as forecast?

My view is that activating the TDA for long periods of time is not acceptable, there should be windows of 30 minutes or an hours activation and then deactivated for at least a similar time. If the whole route structure is changed to narrow constrained routes and the TDA vertical extent to only 400AGL in all areas, Thus providing much less of a blockage to other airspace users, then a longer period would be more acceptable. This isn't going to "delay" anything for the NHS and we know that is only a cover story anyway and there are 6 or more ferries a day between Mull and Oban, so the drone isn't saving a 4 day wait!

Given that anyone can be flying a drone below 400ft away from airfields or other protected areas, I really don't understand why you need a TDA for your operation.

What is really needed is a fully autonomous "detect and avoid" system based on LIDAR or similar as has been approved by the FAA for some operations so that you can avoid any other aircraft, drone, model aircraft, parachutist, hangar glider, bird or other obstacle. Until this is fully developed and certified by the CAA, I don't see any point in continuing with these trials and blocking off airspace from other users.

Once that system is certified then drones should be able to fly around BVLOS below 400ft with impunity and have no need for any TDAs.

You says that there is some sort of collision avoidance system fitted to the drone, but it only works if it picks up an ADSB out signal, this is obviously no good as most aircraft don't have ADSB and nor do other airspace users. So there is little point in having this kind of system unless the drone operators are going to provide free of charge to all other airspace users an ADSB unit and sufficient power supply.

You also mention other aircraft being able to “see” your drone’s ADSB signal on their navigation equipment, again this isn’t the case for most aircraft or other airspace users, it doesn’t pop up on my paper chart or on my iPad running SkyDemon which is only capable of receiving GPS, not much Wi-fi in the air.

While I’m sure you might gain some operational knowledge during these trials, I really think there is little point with all the disruption to other airspace users. It would be far better to concentrate on developing and certifying a truly autonomous “detect and avoid” system not relying on any equipment fitted to other airspace users, then these TDAs wouldn’t be needed and you could operate everywhere away from airfields and other restricted sites without problem.

Best regards



Sent from my iPad

From: [REDACTED]
Sent: 15 January 2021 16:46
To: [REDACTED]
Cc: [REDACTED]
Subject: ACP-2020-099 (and ACP-2020-048) objection

Hi,
I would like to Object to ACP-2020-099 and also ACP-2020-048 (which had a very brief consultation period and very few people were told about it and has not yet been implemented so there is still time)

I fly general aviation aircraft based in Oxfordshire, but have flown to the area many times and will hopefully be up there again a number of times once the lockdown ends and weather improves. Your consultation says you only contacted people within 10 miles of the activity, obviously the nature of aviation is that aircraft travel from all over the country, thus this is totally insufficient. The notification for this sort of restriction needs to be publicised to every pilot.

My main objection is that the proposals for TDAs to cover you commercial drone operation cover a large amount of airspace which extends unnecessarily high and also too close to an often quite busy airfield (Glenforsa) and there is no information on the times for which the TDA will be activated, or constraints on the length of time it might be active.

In order to prevent too much disruption, any activation of these TDAs needs to be NOTAMED at least 24 hours in advance and the NOTAM needs to include the exact timings, which should be for not longer than 30 minutes in each area and with at least a 30 minute gap between times of activation to allow time for GA traffic to pass the area, particularly anywhere near the airfield of Glenforsa. These timings must be included in the ACP

The corridor seems to be very wide, given it's a small drone and presumably flown along accurate GPS routes, the corridors should be made narrower and particularly over the water to the east of Glenforsa, the drone route should be along the eastern shoreline as far away as possible from airfield circuit traffic and not above 400ft.

Many of the TDA areas have max heights above 400ft, this should be revised and all over water portions the max height should be 400ft and revised to be 400ft AGL max in the areas over land, preferably lower.

Glenforsa airfield should be considered as a "Protected Aerodrome" and thus have a 2.5nm radius zone upto 2000ft where no drones are permitted to fly without specific permission. This should be included in your ACP.

There has been mention of ADSB however most aircraft do not have this capability and it cannot be relied on. Drones need to have a system to visually "see and avoid" aircraft as they presumably have for avoiding overhead cables, masts and birds. If drone operators wish aircraft to have any sort of electronic device to enhance/enable drone operation, then this should be fully paid for by the drone operators.

Why not do your trials at night, then there would be no or very minimal disruption to other traffic. Waiting a few hours wouldn't unduly delay anything and anyway anything urgent could easily be sent by speedboat.

Best regards

[REDACTED]

Sent from my iPad

Response 50: Individual L

[REDACTED]

From: [REDACTED]
Sent: 16 January 2021 13:26
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Objection to ACP-2020-099 (and ACP-2020-048)
Attachments: ACP-2020-099 Skyports - Oban-Mull-Coll - Targeted Av Stakeholder Eng Material.pdf

Dear [REDACTED]

Thank you for your email, we have noted your objection. I understand the stakeholder engagement period for ACP-2020-048 to have been 6.5 weeks and has now been withdrawn.

I have attached the stakeholder engagement material for this ACP (ACP-2020-099) and now included you in our list of stakeholders and will ensure any future communications regarding this ACP are shared with you. Please also note that any communications with us are shared with the CAA at the end of the engagement period in a summary report, so feel free to communicate with us [REDACTED] directly going forward.

I have attempted to answer your questions below as best as possible:

- Your points about engagement beyond 10miles of the planned operation and that every pilot should be notified has been noted, thank you. It is currently quite unfeasible to contact every pilot however we are trying to explore better ways to make the GA community aware of airspace changes generally, who are not located in the immediate vicinity. We are currently exploring the use of flying magazines and local newspapers in this regard, which was recommended by another stakeholder. Any suggestions you have on this are appreciated.
- Glenforsa airfield and weather – Thank you for this feedback. At the time of our initial route analysis it was stated this airfield would be closed until 15th July, however we are now in touch with the person who runs this airfield and understand this information was from 2020 and requires updating. We are in the process or revising our routing further away from this airfield (also exploring size reduction where feasible) and I hope to share some revisions and suggestions next Wednesday.
On the weather point we have kept our routing as close to 400ft AGL where possible. All altitudes depicted are AMSL and may have variations due to terrain heights.
- NOTAM and TDA activation – Thank you for the feedback. Currently NOTAMs will be issued 24hrs before any planned flights detailing which TDAs will be active and between what times and will also include a contact number for airspace users to get in touch with us. All TDAs not in use will be deactivated in ensure airspace is still available to all users. It is envisaged only one or two route will be active at any given time.
Your point about reducing NOTAM activation time has also been noted, we are currently exploring this. To ensure flexibility is given to support the NHS we would potentially need to be available on the day for a given TDA, however as mentioned we are trying to explore ways to reduce this.
- ADS-B – The drone vehicle we are using has ADS-B IN & OUT capability and I understand it to be able to be picked up by any aircraft with ADS-B IN capability. Please note that this is not a strategic mitigation and only used by us to improve situational awareness, we will always be operating within our active TDA. It has been suggested by another stakeholder that we include this information on the NOTAM, which is what we intend to do.

We only expect airspace users to follow the rules of the air for the location they are flying in as we are attempting to do. In our case until UAS can comply with the requirements for flight in non-segregated airspace, BVLOS UAS flights outside permanently established segregated airspace may be accommodated through the establishment of segregated airspace on a temporary basis. We won't be paying for ADS-B for other airspace users, however I am

aware the CAA have a rebate scheme in place if that is of interest to you. (<https://www.caa.co.uk/General-aviation/Aircraft-ownership-and-maintenance/Electronic-Conspicuity-devices/>)

- Consultation time – Given the current pandemic and the benefit to the NHS, the reduced stakeholder engagement period has been agreed with the CAA, however we will aim to be flexible where reasonably practicable to accommodate later responses. Please let me know if this is the case.

Thank you once again for your feedback, as mentioned above we are in the process of revising/suggesting a new routing around Glenforsa and hope to be back in touch next Wednesday.

Kind regards,

[Redacted signature]

skyports.net

From: [Redacted]
Sent: 15 January 2021 20:11
To: [Redacted]
Cc: [Redacted]
Subject: Objection to ACP-2020-099 (and ACP-2020-048)

Good evening.

I write to record my objection to ACP-2020-099 and also ACP-2020-048 (which had a very brief consultation period and very few people were told about it and has not yet been implemented so there is still time)

I am a GA pilot with 20 years experience, based at Prestwick airport on the Westcoast of Scotland. Your consultation states you only contacted people within 10 miles of the activity.

I find this incredible, as the Westcoast up to Oban and Mulland out to the islands is not only a favourite destination for myself and other Scottish based GA aviators, but also our friends from down South. The notification for this sort of restriction is totally insufficient, and requires it to be publicised to every GA pilot in Scotland, if not the UK.

My main objection is that the proposals for TDAs to cover your commercial drone operation, cover a large amount of airspace which extends unnecessarily high and also too close to an often quite busy airfield (Glenforsa) and there is no information on the times for which the TDA will be activated, or constraints on the length of time it might be active.

In order to prevent too much disruption, any activation of these TDAs needs to be NOTAMED at least 24 hours in advance and the NOTAM needs to include the exact timings, which should be for not longer than 30 minutes in each area and with at least a 30 minute gap between times of activation to allow time for GA traffic to pass the area, particularly anywhere near the airfield of Glenforsa. These timings must be included in the ACP

The corridor seems to be very wide, given it's a small drone and presumably flown along accurate GPS routes, the corridors should be made narrower and particularly over the water to the east of Glenforsa, the drone route should be along the eastern shoreline as far away as possible from airfield circuit traffic and not above 400ft.

Many of the TDA areas have max heights above 400ft, this should be revised and all over water portions the max height should be 400ft and revised to be 400ft AGL max in the areas over land, preferably lower.

Glenforsa airfield should be considered as a "Protected Aerodrome" and thus have a 2.5nm radius zone upto 2000ft where no drones are permitted to fly without specific permission. This should be included in your ACP.

There has been mention of ADSB however most aircraft do not have this capability and it cannot be relied on. Drones need to have a system to visually "see and avoid" aircraft as they presumably have for avoiding overhead

cables, masts and birds. If drone operators wish aircraft to have any sort of electronic device to enhance/enable drone operation, then this should be fully paid for by the drone operators.

Whilst I appreciate that GA aviation does not have unrestricted access to uncontrolled airspace and there is a need to share the skies, I feel that there has to be far more consultation on this matter and it should not be rushed through on a whim, as nowhere near enough people involved have been consulted on the matter.

Kind regards.

████████████████████

Response 51: Individual M

From: [REDACTED]
Sent: 18 January 2021 08:29
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: ACP-2020-099 UAS BVLOS in Segregated Airspace (Oban-Isle of Mull-Coll)
Attachments: ACP-2020-099 Skyports - Oban-Mull-Coll - Targeted Av Stakeholder Eng Material.pdf

Dear [REDACTED]

Thank you for your feedback in relation to this airspace change. I have attached the stakeholder engagement material for this ACP (ACP-2020-099) and now included you in our list of stakeholders and will ensure any future communications regarding this ACP are shared with you.

We appreciate you see merit in this proposal and I have attempted to answer your questions below as best as possible:

- TDA timing and activation – Currently NOTAMs will be issued 24hrs before any planned flights detailing which TDAs will be active and between what times and will also include a contact number for airspace users to get in touch with us. All TDAs not in use will be deactivated to ensure airspace is still available to all users. It is envisaged only one or two route will be active at any given time. Your point about reducing NOTAM duration has also been noted, we are currently exploring this. To ensure flexibility is given to support the NHS we would potentially need to be available on the day for a given TDA, however as mentioned we are trying to explore ways to reduce this.
- Close proximity to Glenforsa Airfield – Thank you for this feedback. At the time of our initial route analysis it was stated this airfield would be closed until 15th July, however we are now in touch with the person who runs this airfield and understand this information was from 2020 and requires updating. We are in the process of revising our routing further away from this airfield (also exploring size reduction where feasible) and I hope to share some revisions and suggestions this Wednesday.
- Glenforsa Airfield Owner and consultation period – As above we are in touch with the owner of Glenforsa Airfield and have had numerous call with him now and are looking to potentially extend the consultation period (I will be able to update you on Wednesday).
- Low level Military Aircraft – Thank you for this information. We are in touch with the MOD on this point and providing our activity is NOTAM'd they will reach out to us in relation to any training exercise.

[REDACTED] thank you very much for all your useful feedback, it is really appreciated. We are currently collating all stakeholder feedback including yours and hope to have some revisions out this Wednesday.

Kind regards,

[REDACTED]
[REDACTED]
skyports.net



From: [REDACTED]
Sent: 16 January 2021 12:46
To: [REDACTED]
Cc: [REDACTED]
Subject: ACP-2020-099 UAS BVLOS in Segregated Airspace (Oban-Isle of Mull-Coll)

Dear Sir/Madam,

Find attached my response to this proposal. I oppose the proposal as it stands. However, with increased safeguards regarding Glenforsa Airfield, I feel a revised proposal would not be opposed.

My rationale for opposing the proposal is that I feel it has been rushed and there is a real danger that insufficient consultation with stakeholders has taken place. As it stands now I feel there is a real danger of a General Aviation aircraft or even a Military low flying aircraft being endangered by a drone flying in the TDA. I feel that some of the pilots that fly into and out of Glenforsa airfield may accidentally infringe the TDA. Of course they shouldn't infringe an active TDA but mistakes are made and more mitigation should be in the proposal to reduce the chances of making such a mistake and reducing the danger if such a mistake is made.

Yours faithfully,

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

Appendix B: Response form

Name	[REDACTED]
Organisation name	PRIVATE PILOT
Position in the organisation	—
Email	[REDACTED]

Feedback

My interest in this proposal is as a General Aviation Pilot who flies in and out of Glenforsa airfield. I am a retired Air Traffic Controller who, during my 35 years in the job, has been involved in the design of airspace and procedures along with the use of Hazard Analysis and Safety Management.

In general I see merit in your proposal but feel more information needs to be given to interested parties. In particular activity timings of the TDAs. Are they intended to be active for long periods of time or short periods? Regular times or irregular? How far in advance will activity be NOTAMed? How complicated will the NOTAMs be? I.e. are they likely to be misread by private pilots leading to possible fatal conflicts? Note: there have been issues recently of pilots infringing airspace due to poorly worded NOTAMed Controlled Airspace closures.

My major issue though is the close proximity of the TDA to Glenforsa airfield. Glenforsa is an uncontrolled airfield which is very active, especially during the summer months. Many different types of aircraft, with widely varying performance use the airfield. The pilots are also of widely varying performance, skills and experience. Pilots from all over Europe visit the airfield and whilst they should be knowledgeable about UK procedures they may not be. It is imperative that the TDA does not come any closer than 2.5nm from the airfield. Aircraft will be operating below 500ft on the approaches to the runway. And note that the approach from the west is usually a curved approach (from the sea) to avoid turbulence and terrain.

I am sure that mitigations can be found to avoid the risk to aircraft using Glenforsa. Careful choice of route, consultation with the airfield operator and good dissemination of information to other airspace users should give a safe outcome.

Your list of identified stakeholders looks very comprehensive. I just hope that they have all been consulted. I'm led to believe that the owner of Glenforsa airfield was not consulted. He certainly feels that consultation has been lacking. This does not give me much faith in the process. Especially as the consultation period has been drastically shortened.

Response 52: Individual N

From: [REDACTED]
Sent: 06 February 2021 16:59
To: [REDACTED]
Subject: RE: OBJECTION Re: ACP-2020-099 Skyports Oban-Mull-Coll Stakeholder Engagement Reminder & Update

Hi [REDACTED]

Please see responses below, as mentioned I was awaiting information from the flight ops team which has taken longer than anticipated.

- The stakeholder engagement material contains coordinates of the each TDA, you can use these to overlay on any chart/software as you see fit.
- TDA width is based on turn or orbit diameter whichever is larger (generally orbit), plus a safety buffer mandated by the CAA. The design of the proposed TDA has factored these in. Variations in TDA size nearer the take-off and landing locations are due to terrain/population density avoidance etc.
- Dangerous goods will only be carried using approved procedures with permission from the CAA.
- In relation to your loss of communication query, communications are provided by three independent links. The unmanned aircraft will automatically attempt to regain communication if there is a total loss of comms, the drone will continue on its planned route to its destination. This system has been approved by the CAA.
- We are not offering to provide a DACS, only a DAAIS service. If permission is granted to enter, either directly via telephone to Skyports or via Oban Information or Scottish Information, the pilot makes the decision based on the information provided.

Kind regards,
[REDACTED]

From: [REDACTED]
Sent: 06 February 2021 04:02
To: [REDACTED]
Subject: Fwd: OBJECTION Re: ACP-2020-099 Skyports Oban-Mull-Coll Stakeholder Engagement Reminder & Update

[REDACTED]

I have not received a reply to the emails below, nor a response to a number of questions asked earlier in the consultation period. I also await mapping overlay information requested in the email below - have these all gone missing in the email system somewhere?

Could you resend or respond to those enquiries as soon as possible please.

Kind regards
[REDACTED]

Sent from my iPad

Begin forwarded message:

From: [REDACTED]
Date: 1 February 2021 at 10:10:43 GMT

To: [REDACTED]
Subject: Re: OBJECTION Re: ACP-2020-099 Skyports Oban-Mull-Coll Stakeholder Engagement
Reminder & Update

[REDACTED]

I will reserve the right to comment further but essentially, my objection on the basis of previously mention reasons and inadequate consultation still stands.

In the absence of proper overlay of the routings on approved aviation charts within the ACP documentation (as is the norm for such consultations elsewhere) - Please will you send the files for the proposed TDA so I can further investigate dimensions and accurately plot boundaries of proposed airspace on mapping software. For information, I have access to Skydemon, and would also like to view on Google Earth.

I would also appreciate answers to questions posed last week that you have not yet answered. In particular (but not limited to):

Turn radius performance of the aircraft
Procedures to ensure safety of persons and precautions to prevent biohazard/GDPR breach arising from loss payload in the event of ditching/unscheduled landing.
Detail of procedure to ensure safe operations in event of failed communications.

A further matter has come mind:
On what basis (authorisation/approval) are you able to undertake providing a Danger Area Crossing Service by telephone? – my understand in that an aircraft entering a TDA without an approved DACS service via an ATC provider leaves the pilot of such aircraft liable to prosecution for breach of air law.

I look forward to receipt of your answers and also the requested routing files for overlay on mapping software in the near future.

Kind regards

[REDACTED]

From: [REDACTED]
Date: Monday, 1 February 2021 at 08:55
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: OBJECTION Re: ACP-2020-099 Skyports Oban-Mull-Coll Stakeholder
Engagement Reminder & Update

Hi [REDACTED]

Your objection has been noted and the additional reasons below will also be included. If you feel you need some additional time, feel free to get back to me before Thursday evening (some stakeholders have requested this individually).

Thank you for the continued engagement.

Kind regards,

[REDACTED]

From: [REDACTED]

Sent: 31 January 2021 22:05

To: [REDACTED]

Subject: OBJECTION Re: ACP-2020-099 Skyports Oban-Mull-Coll Stakeholder Engagement Reminder & Update

Good evening [REDACTED]

Further to my previous responses and ongoing unanswered questions put to you regarding ACP 2020-099. I note a further revision of ACP 2020-099 was issued on 29/1/2021 at 16:30hrs.

I am obliged once again to write to object to this proposal, for all the previous reasons given and in addition, because inviting consultation of a revision promulgated with allowance of just a single working day to respond cannot be tolerated.

I strongly suggest that you withdraw the proposed ACP and return when you can put together a reasoned and properly promulgated proposal, and with a decent timescale for responses.

Kind regards

[REDACTED]

On 28 Jan 2021, at 16:32, [REDACTED] wrote:

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.

From: [REDACTED]
Sent: 27 January 2021 10:16
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: ACP-2020-099 Oban-Mull-Coll Targeted Aviation Stakeholder Engagement Material

Dear [REDACTED]

In response to your additional comments:

Due to a confidentiality agreement with the drone manufacturer I am unable to provide data/information beyond that which I have already provided. The aircraft isn't designed to safely execute such a manoeuvre you describe.

The conditions of the CAA commencing airspace changes as a priority for Covid-19 projects is that change sponsors are not permitted to use the airspace change for any other purpose. So while we will generate data from our operations, this will not be as part of any official trial of DAA/collision avoidance technology; however, we are working with the CAA in the Regulatory Sandbox in a separate trial project to explore the operation of UAS BVLOS in unsegregated airspace, with a view to helping the CAA create the regulatory regime to approve unmanned technology that safely integrate with other airspace users – negating the need for future segregation.

Kind regards,
[REDACTED]

From: [REDACTED]
Sent: 26 January 2021 14:03
To: [REDACTED]
Subject: Re: ACP-2020-099 Oban-Mull-Coll Targeted Aviation Stakeholder Engagement Material

Dear [REDACTED]

Thank you for your observations. I respond in turn below:

1. Your machine is stated as VTOL capable at MTOW – if a return to base is required, very little space is required for it to slow to hover and reverse direction of travel, then accelerate to transit speed on reciprocal course (even if power demand is higher during that very short phase of flight, it would be mid-route and hence sufficient power reserve for such manoeuvre should be available – if not, the mission is pushing range to beyond sensible, or even safe, boundaries when judged by normal aviation standards).

The VTOL capability is reserved to only support take-off and landing, not to support manoeuvres during flight. It runs on a separate battery system than the battery system uses for forward flight in fixed-wing mode for safety reasons and has been designed to support normal take-offs, aborted take-offs and any other scenario that would require it to hover for a certain amount of time in order to land safely again (e.g. an emergency landing). The system is not designed by the manufacturer for use during forward flight apart from facilitating an emergency landing.

For clarity, I was not referring to using the VTOL capability in forward flight – I suggested that a viable reverse of direction within a constrained leg can be achieved by slowing to hover (in the same manner as would happen prior to landing) and conducting a stationary point turn whilst stationary and then transitioning to forward flight for a return if required.

In addition, following UAS safety standards, the manufacturer decided not to include the function to slow to hover and reverse because it would increase the risk for other airspace users. Travelling at top speed, the SUA would take some time to achieve a stop then turn around and accelerate again. No automatic detect and avoid system would be designed to enable that and would not be approved by the CAA. The UAS follows the same rules of the air for manned aviation which state that if a conflict is detected, a right hand turn should be initiative to deconflict with oncoming traffic.

You are only looking avoiding action in the case of unmanned aircraft to GA aircraft conflict in your response above – however, you will be operating wholly within segregated airspace in a TDA and therefore segregated from GA traffic by means of that TDA.

To detect and avoid conflict depends on visual acquisition or compatible detection system to be carried by any other aircraft operating in the area – visual acquisition is possible but GA aircraft are not required to carry any electronic conspicuity device at all (some do have ADSB or transponders, but a significant majority do not) so relying on that option is not possible at the present time. As I see it, you have not indicated detect and avoid system be a criteria to be met or tested within the purposes of this trial.

Please supply evidence that supports the unavailability of slowing to hover and spot turn functionality, and also supporting evidence to support your contention that the CAA would refuse accept the option to slow and hover in emergency.

Regarding you second response:

2. If an emergency arises requiring grounding immediately whilst in the constrained leg the technology and cargo would be lost – this would occur no matter what width of TDA exists if it lies wholly over water. The risk to the technology and cargo does not change appreciably if within a constrained route.

Further to my response above, an unconstrained leg with a wider TDA would provide us with more options, including continue with the mission, ground at location or execute an orbit/turn to the right and return to home immediately – the latter not an option in a constrained leg.

Of course a wider TDA gives more options to you, and equally fewer options to other airspace users.

If you need the option of grounding at location to be continuously available you might need to look again at routing of all of the TDA sectors that are wholly over water (of which there are many in your ACP), otherwise that argument is invalid.

With regard to return to home, see above... would you really rather ditch than hover... I think not.

Kind regards

[REDACTED]

From: [REDACTED]
Date: Sunday, 24 January 2021 at 12:21
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: ACP-2020-099 Oban-Mull-Coll Targeted Aviation Stakeholder Engagement Material

Good evening [REDACTED]

Thanks for your email and continued engagement on this. Please see my points below (in blue) in response to the two points you raised:

1. Your machine is stated as VTOL capable at MTOW – if a return to base is required, very little space is required for it to slow to hover and reverse direction of travel, then accelerate to transit speed on reciprocal course (even if power demand is higher during that very short phase of flight, it would be mid-route and hence sufficient power reserve for such manoeuvre should be available – if not, the mission is pushing range to beyond sensible, or even safe, boundaries when judged by normal aviation standards).

The VTOL capability is reserved to only support take-off and landing, not to support manoeuvres during flight. It runs on a separate battery system than the battery system uses for forward flight in fixed-wing mode for safety reasons and has been designed to support normal take-offs, aborted take-offs and any other scenario that would require it to hover for a certain amount of time in order to land safely again (e.g. an emergency landing). The system is not designed by the manufacturer for use during forward flight apart from facilitating an emergency landing.

The constrained leg design functionality was designed by the manufacturer to enable the drone to fly below 400ft through mountainous regions. This functionality enables us to plot a route that stays well clear from other aircraft without running the risk of an orbit or RTH being triggered and the drone hitting a mountain ridge as it is making a turn. Passing the airfield in a constrained leg is actually safer even if it does limit our options, for the following reasons:

- i. When using a constrained leg, under no scenario would we end up executing an orbit because the ADS-B has picked up another aircraft that it might think breached our 'well clear' area around the aircraft. Circling in the vicinity of an airfield because of nearby traffic would increase the risk for all aircraft in the area.*
- ii. By operating within a constrained leg we take up as little space as possible. The SUA has a small corridor that it will navigate through and will automatically trigger an emergency land if it determines that it has breached that corridor.*
- iii. The constrained leg provides a very specific corridor so that other airspace users will know exactly where the SUA is operating and have space to avoid it. The strait is more than 4km wide and the constrained leg takes up ~40m.*

In addition, following UAS safety standards, the manufacturer decided not to include the function to slow to hover and reverse because it would increase the risk for other airspace users. Travelling at top speed, the SUA would take some time to achieve a stop then turn around and accelerate again. No automatic detect and avoid system would be designed to enable that and would not be approved by the CAA. The UAS follows the same rules of the air for manned aviation which state that if a conflict is detected, a right hand turn should be initiative to deconflict with oncoming traffic.

Last year Skyports was onboarded into the CAA Regulatory Sandbox to explore with the regulator the viability of solutions for BVLOS operations of UAS in unsegregated airspace. The CAA is keen to accelerate its learnings and gain additional knowledge it can share with others. Nevertheless, the viability of solutions to operate UAS BVLOS in unsegregated airspace may still require airspace segregation in the first instance as part of an iterative trial plan; therefore, the allowance of unmanned aircraft systems to successfully and safely exist in airspace users without the need for segregated airspace may still require some segregation in the first instance to support trials of solutions, and to help develop the appropriate regulatory frameworks and CAA approval mechanisms.

2. If an emergency arises requiring grounding immediately whilst in the constrained leg the technology and cargo would be lost – this would occur no matter what width of TDA exists if it lies wholly over water. The risk to the technology and cargo does not change appreciably if within a constrained route.
 - *Further to my response above, an unconstrained leg with a wider TDA would provide us with more options, including continue with the mission, ground at location or execute an orbit/turn to the right and return to home immediately – the latter not an option in a constrained leg.*

Kind regards,

[REDACTED]

From: [REDACTED]
Sent: 23 January 2021 15:39
To: [REDACTED]
Subject: ACP-2020-099 Oban-Mull-Coll Targeted Aviation Stakeholder Engagement Material

Good afternoon [REDACTED]

Thank you for sending the updated ACP material.

I have not fully digested the content yet but one section in your latest presentation immediately springs to attention, which is the emotional emphasis of 'constrained leg' risk to your technology and cargo. This requires factual justification.

While operating a constrained leg is feasible, it is less desirable from a UAS operator perspective. As soon as the SUA enters a constrained leg, the SUA will not be able to immediately execute a return-to-home in the event of an emergency as it does not have the space to execute a turn. The SUA will need to complete its exit from the constrained leg and then it will make the return back through the constrained leg, or it will complete its mission if the remote pilot determines that is a safer maneuver. In the event of an emergency that requires the SUA to be grounded immediately while in the constrained leg, the remote pilot will have no option but to land in the sea, resulting in the total loss of technology and payload. Operating in constrained legs is therefore sub-optimal from a UAS operations perspective.

My thoughts are (and please feel free to correct me if I am mistaken):

- 1) Your machine is stated as VTOL capable at MTOW – if a return to base is required, very little space is required for it to slow to hover and reverse direction of travel, then accelerate to transit speed on reciprocal course (even if power demand is higher during that very short phase of flight, it would be mid-route and hence sufficient power reserve for such manoeuvre should be available – if not, the mission is pushing range to beyond sensible, or even safe, boundaries when judged by normal aviation standards).
- 2) If an emergency arises requiring grounding immediately whilst in the constrained leg the technology and cargo would be lost – this would occur no matter what width of TDA exists if it lies wholly over water. The risk to the technology and cargo does not change appreciably if within a constrained route.

I strongly feel that sponsors should not resort to hinting at what could be considered emotional blackmail in consultation material – it should be factual at all times.

I shall respond further in due course.

Kind regards

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

From: [REDACTED]
Date: Friday, 22 January 2021 at 13:42
Subject: Version 2 ACP-2020-099 Oban-Mull-Coll Targeted Aviation Stakeholder Engagement Material

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) which 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 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 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.

Kind regards,

[Redacted signature]

skyports.net



From: [REDACTED]
Sent: 21 January 2021 16:14
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: ACP 2020-099 Oban-Isle of Mull-Coll ---- Objection----

Hi [REDACTED]

I have had to liaise with my colleagues to answer your queries. Please see points below:

- This stakeholder engagement exercise is related to and limited to enabling COVID-19 response for the NHS.
- Any future operations we plan to carry out would need to be discussed with the CAA first to determine what the process requirements will be, if any, to enable them.

I shall be in touch this week to share further revisions of this ACP-2020-099 based on all stakeholder received.

Kind regards,

[REDACTED]

From: [REDACTED]
Sent: 20 January 2021 12:37
To: [REDACTED]
Subject: Re: ACP 2020-099 Oban-Isle of Mull-Coll ---- Objection----

Good afternoon [REDACTED]

Once again thank you for your reply.

Understood the EVLOS condition test - However, you have not explained how you intend to integrate rather than segregate for the purposes of your stated aim of 2021 package delivery trials and beyond.

Or is ALL such operation to be within sight of the operator?

Kind regards

[REDACTED]

From: [REDACTED]
Date: Wednesday, 20 January 2021 at 11:02
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: ACP 2020-099 Oban-Isle of Mull-Coll ---- Objection----

Morning [REDACTED]

For information that demonstration was performed under EVLOS not BVLOS conditions. In relation to your comments we are aligned in your thinking that integration rather than segregation should be the process moving forward and understanding this to be the CAA medium/long term plan. Hopefully technology and regulation will develop sufficiently to allow this in the near future.

Kind regards,

[REDACTED]

From: [REDACTED]
Sent: 20 January 2021 09:19
To: [REDACTED]
Subject: Re: ACP 2020-099 Oban-Isle of Mull-Coll ---- Objection----

Good morning [REDACTED]

Thank you for your reply.

I have a question regarding another project associated with your company name – see link below:

The question is, how do you envisage operating to multiple locations ‘on-demand’ whilst integrating with other airspace users and without resorting to segregation?

I appreciate there is usually no segregation required for operation in line of sight – but any operation BVLOS would require segregation for each BVLOS delivery (or group of deliveries) – this at present would be by means of TDA and is surely is unfeasible within the current NOTAM system?

<https://droneprep.uk/drone-delivery-preregister>

Kind regards

[REDACTED]

From: [REDACTED]
Date: Monday, 18 January 2021 at 09:19
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: ACP 2020-099 Oban-Isle of Mull-Coll ---- Objection----

Dear [REDACTED]

I have received your email from my colleague [REDACTED]. Thank you for this information about the general area and your thoughts on integration rather than segregation with other airspace users, which is a view we share at Skyports and also in line with CAA medium/long term strategy. Your objections have also been noted.

I have attached the stakeholder engagement material for this ACP (ACP-2020-099) and now included you in our list of stakeholders and will ensure any future communications regarding this ACP are shared with you. Please also note that any communications with us are shared with the CAA at the end of the engagement period in a summary report, so feel free to communicate with us [REDACTED] directly going forward.

I have attempted to answer your questions below as best as possible:

- Integration rather than segregation, TDA activation should be outside high intensity GA hours – Currently NOTAMs will be issued 24hrs before any planned flights detailing which TDAs will be active and between what times and will also include a contact number for airspace users to get in touch with us. All TDAs not in

use will be deactivated to ensure airspace is still available to all users. It is envisaged only one or two route will be active at any given time.

Your point about reducing NOTAM activation time has also been noted, we are currently exploring this. To ensure flexibility is given to support the NHS during this pandemic we would potentially need to be available on the day for a given TDA (given hospital ad-hoc demands and opening hours), however we are trying to explore ways to reduce this.

For information until UAS can comply with the requirements for flight in non-segregated airspace, BVLOS UAS flights outside permanently established segregated airspace may be accommodated through the establishment of segregated airspace on a temporary basis.

- Glenforsa Airfield - At the time of our initial route analysis it was stated this airfield would be closed until 15th July, however we are now in touch with the person who runs this airfield and understand this information was from 2020 and requires updating. We are in the process of revising our routing further away from this airfield (also exploring size reduction where feasible) and I hope to share some revisions and suggestions next Wednesday.
- Danger Area Crossing – For information we currently have a Temporary Operating Instruction (TOI) with the emergency services (HEMS) where they can access out TDA via Scottish Information or Oban Information during their hours of operation, we are in discussions with NATS regarding this.

We appreciate the offer to further discuss all the above on a call, currently we plan to have some revisions/suggestions out this Wednesday and look forward to engaging further after this (it is also likely we will extend the engagement period).

Kind regards,

[Redacted signature]

skyports.net



From: [REDACTED]
Sent: Saturday, January 16, 2021 12:35 pm
To: [REDACTED]
Subject: ACP 2020-099 Oban-Isle of Mull-Coll ---- Objection----

Dear sir,

This correspondence is sent in response to ACP-2020-099 (and the earlier consultation(s) relating to this project, and to which we were not made aware).

Objection grounds:

We would like to lodge our objection to establishment of TDA in the Oban/Mull area, as proposed, on the grounds that this is an important part of open FIR, used by numerous aircraft visiting and working in the area, where establishment of any TDA, as proposed, would compromise safety and enjoyment of established airspace users, and be to the detriment of businesses and service providers in the area.

General Information:

We visit the area on an average of four (mostly multi-day) visits per annum by air and fly for some 30-40hours each year to/in the area under question.

When in the Oban/Mull area, we normally stay at the hotel and operate our aircraft from the airstrip at Glenforsa - (average spend £150/day).

We regularly visit Oban Airport for fuel (average once per day, per visit – with average spend >£200 per day.)

It is important to understand that we, and each and every visitor to the area, bring significant financial contribution to the local economy and generate continuing justification for the existence of Oban Airport and associated employment of personnel/service provision there.

A large number of GA and Commercial Air Traffic aircraft frequent this area. The majority of GA traffic occurs in VFR and in daytime hours at relatively low level, usually sub 3000ft ASL/AGL - or lower if weather conditions dictate.

There is no Danger Area crossing service nor ATC provider able to offer complete Radio Telephony cover with the area, so crossing a TDA, as proposed, may not be possible, with obvious safety/infringement implications if unable to climb above when operating in the area or needing to access local airfields.

UAV Operations:

Whilst we recognise that emerging technology such as UAV is coming and will require opportunity for development of procedures to operate safely - that **must not** be at the expense of exclusion of other airspace users and detriment to associated businesses/service providers.

To that end:

1. It is unreasonable to establish blanket segregated airspace that impinges on established use and enjoyment of the local open FIR airspace without a solid and continuing undertaking to mitigate against the loss of access to that airspace to other users at the sponsor's cost.
2. It is very important to understand that aircraft travel large distances and operate both during daylight and night-time hours, so such mitigation (eg provision of a Danger Area crossing service) must be in place continuously during the hours of operation of any Danger Area(s) established.

3. It is important to design any airspace (including for purpose of trials) to avoid negative impact on local businesses and service providers.
4. A far better way to operate this emerging technology is to **integrate** with other airspace users, rather than to **segregate** - long term, this might be achievable by implementation of electronic separation measures, but we recognise that is not feasible at this time.

As a minimum, the establishment of any Temporary Danger Areas for trials of this kind should be outside times of high intensity GA traffic and the Proposer should consider limiting the trial period establishment of TDA to minimum possible periods of operation and to be at pre-notified periods, preferably at night, rather than in daylight hours until safe inter-operability protocols be discussed and established. Any TDA established must be deactivated outside of notified hours.

We welcome your comments and remain available for further discussion on this subject at any time should you should require further information or have any questions.

Kind regards

[Redacted signature block]

Response 53: Individual O

From: [REDACTED]
Sent: 23 January 2021 11:14
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Version 2 ACP-2020-099 Oban-Mull-Coll Targeted Aviation Stakeholder Engagement Material

Thank you [REDACTED], your support has been noted.

Kind regards,
Ricky

From: [REDACTED]
Sent: 22 January 2021 14:54
To: [REDACTED]
Subject: Re: Version 2 ACP-2020-099 Oban-Mull-Coll Targeted Aviation Stakeholder Engagement Material

Thank you [REDACTED]
With these careful changes, you now have my support.
Best wishes, [REDACTED]

On Fri, 22 Jan 2021 at 13:42, [REDACTED] wrote:

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) which 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.

Response 54: Individual P

From: [REDACTED]
Sent: 18 January 2021 11:11
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: ACP-2020-099 UAS BVLOS in Segregated Airspace (Oban-Isle of Mull-Coll)
Attachments: ACP-2020-099 Skyports - Oban-Mull-Coll - Targeted Av Stakeholder Eng Material.pdf

Dear Mr [REDACTED]

Thank you for your feedback in relation to this airspace change. I have attached the stakeholder engagement material for this ACP (ACP-2020-099) and now included you in our list of stakeholders and will ensure any future communications regarding this ACP are shared with you.

Your objection has been noted and I have attempted to answer your questions below as best as possible:

- Carriage of Dangerous goods, other transportation means – Thank you for your comments. This operation is in response to a written request from the National Health Service (NHS) in Scotland for assistance with the response to COVID-19. Transport of medical equipment, medical samples (including dangerous goods in the form of blood samples) is likely to occur which technically comes under dangerous goods. We are in discussions with the CAA regarding permissions for this.
- Airspace Integration - For information until UAS can comply with the requirements for flight in non-segregated airspace, BVLOS UAS flights outside permanently established segregated airspace may be accommodated through the establishment of segregated airspace on a temporary basis. We are aligned in your opinion that drones can integrate with manned aviation in the future and believe this to be the CAAs medium to long term plan, however for now we have to follow the current regulation.

Thank you for your feedback Jeremy, we are in the process of collating all stakeholder feedback and hope to have a revision/suggestions out this Wednesday.

Kind regards,

[REDACTED]

skyports.net



From: [REDACTED]
Sent: 16 January 2021 17:23
To: [REDACTED]
Cc: [REDACTED] >
Subject: ACP-2020-099 UAS BVLOS in Segregated Airspace (Oban-Isle of Mull-Coll)

This is my response to your subject proposal, which I oppose.

From [REDACTED]

PPL member of Prestwick Flying Club (this is however my individual response).

"The proposal is for the transport of inter alia dangerous goods, by unmanned aerial vehicle, beyond line of visual sight. I don't think this can be allowed under any circumstances outwith military operations. If transport of the type of goods described is truly urgent, it would make more sense to send by helicopter, or fast boat, and/or to establish stocks of required items closer to the points of need, and restock by conventional modes of transport. It is stated that the use of UAVs is to substitute for the postal service. This does not indicate any degree of urgency, and faster, cheaper, conventional means of transport are available if urgency is required.

The proposal states that "Skyports will be able to ... better understand how to provide a permanent service over time, which could be scaled and applied to other parts of the UK. Additionally, the NHS is using this project as an opportunity to properly assess the long-term viability of such a service." So this is far from being a one-off proposal for a temporary trial."

I do believe that drones could integrate with manned aviation in future, but I do not believe the technology is yet sufficiently advanced to enable see-and-avoid capabilities equivalent to a human pilot, and to obviate the need for creating yet more controlled airspace. I have sent the above response to the LAA who will be submitting a coordinated response.

Response 55: Individual Q

From: [REDACTED]
Sent: 18 January 2021 11:24
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: ACP-2020-099 (and ACP-2020-048) objection
Attachments: ACP-2020-099 Skyports - Oban-Mull-Coll - Targeted Av Stakeholder Eng Material.pdf

Dear [REDACTED]

Thank you for your email, we have noted your objection.

I have attached the stakeholder engagement material for this ACP (ACP-2020-099) and now included you in our list of stakeholders and will ensure any future communications regarding this ACP are shared with you. Please also note that any communications with us are shared with the CAA at the end of the engagement period in a summary report, so feel free to communicate with [REDACTED] directly going forward.

I have attempted to answer your questions below as best as possible:

- Glenforsa Airfield and excessively wide airspace used for TDAs - Thank you for this feedback. At the time of our initial route analysis it was stated this airfield would be closed until 15th July, however we are now in touch with the person who runs this airfield and understand this information was from 2020 and requires updating. We are in the process of revising our routing further away from this airfield (also exploring size reduction where feasible) and I hope to share some revisions and suggestions next Wednesday.
- Reason for TDA creation – FYI until UAS can comply with the requirements for flight in non-segregated airspace, BVLOS UAS flights outside permanently established segregated airspace may be accommodated through the establishment of segregated airspace on a temporary basis.
- TDA height - We have kept our routing as close to 400ft AGL where possible. All altitudes depicted are AMSL and may have variations due to terrain heights
- Suggestions – Thank you for all your suggestions, we are currently assessing all stakeholder recommendations, including yours and I hope to have some revisions/suggestions to share this Wednesday.

Kind regards,

[REDACTED]

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attachment. Please note that neither Skyports Limited nor the sender accepts any responsibility for viruses and it is your responsibility to scan or otherwise check this email and any attachments.

From: [REDACTED]

Sent: 16 January 2021 18:27

To: [REDACTED]

Subject: ACP-2020-099 (and ACP-2020-048) objection

Dear sirs / madame.

I write to you with reference to the planned TDA's mentioned above.

I would like to lodge my objection of what seems excessive control of currently uncontrolled airspace.

Flying a permit 3 axis microlight, and enjoying the ability fly around the west coast of Scotland in uncontrolled airspace with a see and be seen mentality is a fantastic opportunity.

Whilst I fully understand the current pressures of Covid 19, I also see the advantage of utilising the pandemic to force changes of airspace with a view to making these changes more permanent for commercial gain in the future.

For one example the airspace request is excessively wide and high for a very controllable GPS tracked drone, also the current plan cuts through the Glenforsa Airfield on the Isle of Mull, can this be a serious request?

A 17 kg drone plus payload would cause severe damage to fabric covered aircraft and would most likely result in a crash and quite possibly fatalities.

As a pilot of a 3 axis microlight spotting and seeing aircraft is difficult a 2ft sq drone would be nearly impossible until too late.

We in general aviation need to share airspace and I see the vast benefits of drones being utilised for deliveries to the Scottish Highlands and Isles, but safety is of the utmost importance.

My suggestions would be to:

1, limit heights to 400ft thus giving separation.

2, Route safely (1 mile radius) of all airfields to reduce the possibilities of contact within congested areas

3, utilise visual methods of navigation for drones to enhance the See and be seen mentality.

4, consider flights after sunset thus will eliminate most VFR recreational traffic and must be a viable option as a 24hr notice to activate the TDA could be reduced if operating at night.

Best regards

[REDACTED]
[REDACTED]
[REDACTED]

Response 56: Individual R

From: [REDACTED]
Sent: 19 January 2021 17:44
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: ACP-2020-099 Mull
Attachments: ACP-2020-099 Skyports - Oban-Mull-Coll - Targeted Av Stakeholder Eng Material.pdf

Dear [REDACTED]

Thank you for your feedback in relation to this airspace change. I have attached the stakeholder engagement material for this ACP (ACP-2020-099) and now included you in our list of stakeholders and will ensure any future communications regarding this ACP are shared with you. I understand you have also been in touch with my colleague Simon Whalley on 17/01 and apologise if the information below is a duplication. Your objection has been noted.

I have attempted to answer your questions below as best as possible:

Glenforsa – At the time of our initial route analysis it was stated this airfield would be closed until 15th July, however we are now in touch with the person who runs this airfield and understand this information was from 2020 and requires updating. We are in the process of revising our routing further away from this airfield (also exploring TDA size reduction where feasible) and I hope to share some revisions and suggestions this Wednesday.

TDA altitudes - We have kept our routing as close to 400ft AGL where possible, as in accordance with the CAA Drone Code, drones should operate at ideally <400ft to avoid other airspace users. All altitudes depicted are AMSL and may have variations due to terrain heights. We are currently reviewing the routing and altitudes to see if they can be reduced further.

NOTAM and Communication - Currently NOTAMs will be issued 24hrs before any planned flights detailing which TDAs will be active and between what times and will also include a contact number for airspace users to get in touch with us. All TDAs not in use will be deactivated to ensure airspace is still available to all users. It is envisaged only one or two routes will be active at any given time. To ensure flexibility is given to support the NHS during this pandemic we would potentially need to be available on the day for a given TDA (given hospital ad-hoc demands and opening hours), however we are trying to explore ways to reduce this. I hope to update you tomorrow. For information we currently have a Temporary Operating Instruction (TOI) with the emergency services (HEMS) where they can access our TDA via Scottish Information or Oban Information during their hours of operation, we are in discussions with NATS regarding this.

Engagement - A timeline for this airspace change, including period of targeted engagement with relevant aviation stakeholders was agreed with the CAA. We have subsequently agreed with the CAA an extension of the targeted engagement window for this ACP by a week.

Thank you for your comments, I hope to be in touch tomorrow to share any revisions/suggestions based on all stakeholder feedback, including yours.

Kind regards,

[REDACTED]
[REDACTED]
skyports.net

-----Original Message-----

From: [REDACTED]

Sent: 19 January 2021 13:53

To: [REDACTED]

Subject: ACP-2020-099 Mull

I object to the application by Skyports for a TDA in the vicinity of the island of Mull

Although this application is for 4 weeks covering April/May in a relatively remote part of the country it will undoubtedly be followed by further applications in the future and may set a precedent for further applications. It is therefore important to achieve a solution that would be acceptable anywhere in the country.

This area of Scotland is frequented by many light aircraft visiting the West coast and islands. The proposed route passes extremely close to Glenforsa airfield, a popular destination, and will provide a distraction to arriving and departing pilots.

The heights requested go as high as 950 ft amsl. This is unacceptable. In the unpredictable and often poor weather conditions found in the area pilots can be forced suddenly to fly below 950 feet in order to reach the nearest airfield. Any drones should operate close to the surface, at 400 feet or preferably less, so as not to be a hazard to pilots trying to maintain VMC in difficult conditions.

Applications for BVLOS operations should emphasise the sharing of airspace and try to preserve this. There is no suggestion of sharing in this application. The suggestion is that the Notam will be activated the day before for the whole day. This is unacceptable. There are already too many Danger Areas over the UK where the operator has permanent access to the airspace but rarely uses it. They then fail to release the airspace when it is not required.

In any case where a TDA can be justified, the airspace should be activated for the minimum time possible to ensure that opportunities to use the airspace are not wasted. A permanently manned telephone number should be available for pilots intending to operate close to or in the airspace to call the operator. They can then determine if the airspace is actually being used or if the flight has been cancelled. The heights used should be below any likely to be used by aircraft. The routings should avoid the protected areas around airfields, normally 2.5 miles.

The applicant has, unilaterally, decided to reduce the CAA's recommended engagement with stakeholders period from 12 to 2 weeks. Not only is this entirely unnecessary and unacceptable, but also casts doubt over the integrity of the applicant.

The application makes maximum use of the "sympathy factor" that claiming to work with the NHS can provide, but fails to point out the regular air services to the islands and ferry services to Mull which could provide the same service.

[REDACTED]

Response 57: Individual S

From: [REDACTED]
Sent: 31 January 2021 08:42
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: ACP-2020-099 Skyports Oban-Mull-Coll Stakeholder Engagement Reminder & Update

Hi [REDACTED]

Email is absolutely fine, your response has been noted. We really appreciate your support and hopefully we can find a way to work together with all stakeholders.

Kind regards,
[REDACTED]

From: [REDACTED]
Sent: 30 January 2021 16:44
To: [REDACTED]
Subject: Re: ACP-2020-099 Skyports Oban-Mull-Coll Stakeholder Engagement Reminder & Update

Dear [REDACTED]

I don't know if you wanted feedback by email or if there was a page to fill out on the internet.

I can assure you that the vast majority of island inhabitants support these proposals. We feel that you have gone above and beyond reasonable duty to accommodate the complainers.

The airstrip at Glenforsa is unlikely to open this season as travel to and from there is currently prohibited. [REDACTED]
[REDACTED]

I do sincerely hope that you get the go ahead and that the delivery of supplies to the islands can commence. Covid is becoming a real problem island wise now and any help is appreciated

[REDACTED]

On 28 Jan 2021, at 16:32, [REDACTED] wrote:

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>

Response 58: Individual T

From: [REDACTED]
Sent: 18 January 2021 15:37
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: ACP-2020-099 UAS BVLOS in Segregated Airspace (Oban-Isle of Mull-Coll)
Attachments: ACP-2020-099 Skyports - Oban-Mull-Coll - Targeted Av Stakeholder Eng Material.pdf

Dear [REDACTED]

Thank you for your email.

I have attached the stakeholder engagement material for this ACP (ACP-2020-099) and now included you in our list of stakeholders and will ensure any future communications regarding this ACP are shared with you. Please also note that any communications with us are shared with the CAA at the end of the engagement period in a summary report, so feel free to communicate with us (myself and Simon) directly going forward.

I have attempted to answer your questions below as best as possible:

- NOTAM and service efficiency – Currently NOTAMs will be issued 24hrs before any planned flights detailing which TDAs will be active and between what times and will also include a contact number for airspace users to get in touch with us. All TDAs not in use will be deactivated in ensure airspace is still available to all users. It is envisaged only one or two route will be active at any given time. To ensure flexibility is given to support the NHS we would potentially need to be available on the day for a given TDA, however we are currently trying to explore ways to reduce this.
- Glenforsa Airfield and initial contact – At the time of our initial route analysis it was stated this airfield would be closed until 15th July, however we are now in touch with the person who runs this airfield and understand this information was from 2020 and requires updating. We are in the process of revising our routing further away from this airfield (also exploring size reduction where feasible) and I hope to share some revisions and suggestions this Wednesday. FYI Glenforsa Airfield was included as a stakeholder in our initial engagement.
- Reason for TDA – Until UAS can comply with the requirements for flight in non-segregated airspace, BVLOS UAS flights outside permanently established segregated airspace may be accommodated through the establishment of segregated airspace on a temporary basis. Until the rules are changes this is the process we need to follow.
- Sizes of TDA and altitudes – We have kept our routing as close to 400ft AGL where possible, as in accordance with the CAA Drone Code, drones should operate at ideally <400ft to avoid other airspace users. All altitudes depicted are AMSL and may have variations due to terrain heights. We are currently reviewing the routing and altitudes to see if they can be reduced further.

Thank you for taking the time to give us your feedback, I will be in touch hopefully this Wednesday to provide revisions/suggestions based on all stakeholder feedback, including yours.

Kind regards,

[REDACTED]
[REDACTED]

skyports.net

From: [REDACTED]
Sent: 18 January 2021 08:15
To: [REDACTED]
Cc: [REDACTED]
Subject: ACP-2020-099 UAS BVLOS in Segregated Airspace (Oban-Isle of Mull-Coll)

Dear Skysport,

I am a member of Prestwick Flying Club and members regularly fly to Glenforsa.

The first I heard about this application was by word of mouth, and so you have not contacted interested parties.

If you were to use the route you would have to NOTAM the route to allow GA safety. This requires 24hrs notice which totally negates the efficiencies to service that you claim by using a drone.

With regard to the route I note that the proposed lane lies across the approaches to Glenforsa airfield (I don't think you contacted them either, which is surprising) where aircraft will be regularly flying below 500 ft, pilots having enough on their minds without having to worry about wayward drones. I know it is stated that this is for trial purposes, but presumably you are looking to prove this route and so the above situation could happen in the future.

I don't understand why the drone heights need to be above 400 ft amsl anywhere. Other than on the approaches to an airfield we are not allowed to fly within 500 ft of the ground and so keeping your drones below 400 ft and well away from airfield approaches would ensure that there is no conflict with regard to airspace.

The width of the airspace is of the order of 2nm, which is excessive given the size of your drones, surely you could designate a much narrower corridor, below 400ft amsl along the entirety of the route, and remaining close to the mainland coastline along the Sound of Mull, thereby giving plenty of space around the approaches to Glenforsa?

Regards

[REDACTED]

Response 59: Individual U

From: [REDACTED]
Sent: 31 January 2021 14:47
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: ACP-2020-099 Skyports Oban-Mull-Coll Stakeholder Engagement Reminder & Update

Hi [REDACTED]

Thank you for your email and your additional points. I will ensure these are included in addition to your previous response on 27/01/21.

Both points are noted and will be feed back to the team. We are currently looking closely at the weather criteria and your point about having 7 days between the issue of a new version and the response deadline is noted.

If you do require additional time this is possible and has been discussed with stakeholders on an individual basis. If you have any additional thoughts feel free to get in touch by Thursday evening.

Kind regards,
[REDACTED]

From: [REDACTED]
Sent: 31 January 2021 14:05
To: [REDACTED]
Cc: [REDACTED]
Subject: Re: ACP-2020-099 Skyports Oban-Mull-Coll Stakeholder Engagement Reminder & Update

Thank you for version 3 of your document and I appreciate the various mitigations you are proposing to reduce the risks.

The comments on my response (PDF file dated 27 Jan 2021 - attached) remain the same, but I would also like to add the comments / observations below to the stakeholder feedback:

1 - It is good that Skyports recognise the possibility that aircraft might be forced to penetrate the TDAs and that an in-flight clearance process with Oban / Scottish information is being explored. However, it is not possible to make any comments on this until Skyports are able to set out precise details of the system that would be in place.

2 - The idea of only operating when the cloud base is above 1500ft and therefore penetration of the TDAs would not be necessary is interesting, however this raises a number of further questions not covered by version 3. For example, in the first instance I think it necessary to have confirmation from a professional metrologist that Windy would actually provide the necessary real time indication of cloud bases in the area covered by the TDAs. Secondly, the actual process (such as when the go/no go decision is promulgated and what happens if cloud base subsequently changes) needs to be more clearly defined; again before it is possible to make any comment.

Given the fundamental importance of both these issues, I think it clearly necessary that the stakeholder engagement process needs to be further extended until such time as Skyports have been able to firm up these new proposals, and stakeholders have been able to respond.

Also as a general point, given the constraints of work and other commitments on stakeholders, there should I think be an absolute minimum of 7 days between the issuing of new versions of the engagement document and the response deadline.

Please confirm receipt of this email.

[Redacted]

On 28/01/2021 16:31, [Redacted]

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.net



From: [REDACTED]
Sent: 28 January 2021 11:55
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: ACP-,2020-099 UAS BVLOS in Segregated Airspace (Oban-Isle of Mull-Coll)

Hi [REDACTED]

Thank you for your email, and taking the time to share the reasons for your objection. I confirm receipt and your objection is noted.

FYI I will be sending out a reminder email later today which will also explain how we will not operate when cloud base <1500ft AMSL.

Thank you once again, all stakeholder responses will be shared with the CAA in our stakeholder summary report post engagement.

Kind regards,
[REDACTED]

From: [REDACTED]
Sent: 27 January 2021 20:49
To: [REDACTED]
Cc: [REDACTED]
Subject: ACP-,2020-099 UAS BVLOS in Segregated Airspace (Oban-Isle of Mull-Coll)

Please find attached my response to the stakeholder engagement.

Please acknowledge receipt.

[REDACTED]

ACP-2020-099 - UAS BVLOS in Segregated Airspace (Oban-Isle of Mull-Coll)

I regularly fly and have an aircraft based in the area affected by the application.

I would like to OBJECT to the application on two main grounds:

- 1) - The TDAs would prevent or reduce access to areas of low ground or water necessary for the safe conduct of GA flights not covered by any exemptions (TOIs).
- 2) - The Statement of Need does not adequately make the case for Skyports business trial against the safety and operational needs of GA in the area.

1 - Safety

The vast majority of flights in the area are private or commercial light aircraft and microlights. West Coast of Scotland flying is very different to other areas of the country and there are relatively few GA pilots regularly flying in this area. When flying here it is essential to have the option to fly along the coast or over low lying land to avoid clouds and mountains.

With the UAS operating up to 750ft, and assuming a 500ft separation, aircraft would typically need to stay above 1300ft over some of the TDAs being sought. However, in these areas at times it is necessary to fly as low as 500 ft to remain VFR (and safe), and the nature of the weather, which often changes from hour to hour, means that it is not possible to predict when it will be necessary to fly this low to get to one of the few airfields.

Taking as an example an aircraft flying from Prestwick to Oban: It might well leave Prestwick with a 3000ft cloud base, but by the time it gets close to Oban this might have gone down to below 1500ft on the west side of the high ground to the south and west of the town. Returning to Prestwick might not be possible, leaving continuing to Oban Airport the only option.

This route is regularly flown by GA aircraft, and if approved the TDAs could cause multiple aircraft to be 'sandwiched' between clouds and the TDA, or having to try and pick a route through the mountains.

This is made all the worse because weather reports from Prestwick and Oban (if available) may well not reflect the actual weather approaching Oban town. There is no radar surveillance, and Oban Information may not be available (including for aircraft operating out of hours), Scottish Information and West Coast are unreliable in this area and a Danger Area Crossing Service has not been established.

There would also be height constraints for aircraft approaching from the west down the sound of Mull, and those using the IFR (unofficial) procedure for Oban. This involves descending and breaking cloud at BRUCE and then following the coast VFR to the airport. In

both instances there are times when it can be necessary to fly as low as 500ft, which again would not allow for a suitable clearance above the TDA.

Given that Skyports are wanting to provide an 'as required' service it would seem likely that they will want to keep the TDAs around Oban at least in place during the 5 week period, rather than creating a NOTAM before each 'job' that comes in.

2 – Statement of needs

Skyports define this application as a Business Trial and have confirmed that they are themselves contributing to the funding. Given the current and possible future commercial interests of Skyports, there are perhaps potential conflicts of interests with regards their role in this and previous consultations as the Change Sponsor.

Skyports describe the starting point of their application as a written request from the NHS to help with the Covid-19 response. However, they have declined to share this letter as part of the consultation / engagement process. Likewise they have declined to provide access to other documents relating to the application, such as the UK space agency grant and previous linked applications (eg. Lochgilphead to Oban) – this would appear to run counter to the needs for Transparency or more generally the Gunning Principals. Put another way, if the consultees knew more about the 'bigger picture' and what is wanted, then they would be in a better position to properly engage with the consultation.

The application claims to build on their previous experience and to have a comprehensive picture of airspace usage in the area. This is presumably from the Oban to Craignure trial. However, no post engagement reports have been submitted to the CAA portal. It would be useful for instance to know how much the TDAs were used, what notice was provided, and the responses and feedback from the relevant health care providers.

This said, such reports would provide little indication on the effect on GA, as virtually none occurred during that period. Moreover there was very little (if any) involvement from the GA community for the preceding Lochgilphead to Oban application, and this does raise further serious questions about Skyports approach to the engagement process.

Skyports claim that their UAS approach would reduce the turnaround time for tests by up to 3½ days. Whilst this might in theory be the case if samples were posted, a more reasonable comparison (for urgent samples at least) would be road / ferry transfers. Even for Coll this would be more like a day.

The claim that this UAS delivery service would transform local health care is not easily understood. As this is being used to justify the establishment of TDAs it should perhaps be supported by an independent assessment of the potential clinical benefits and costs of the proposed system – at the very least to confirm there are real and tangible problems that might be solved by BVLOS UVA. In essence, the claimed clinical urgency and benefits really need to be properly defined and justified.

The application is also not clear about what specifically needs to be tested or trialled, and why their proposed overall approach is really necessary. For example, if the issue is BVLOS UAS access to remote Scottish locations then other lochs, islands and locations could be used, or existing Danger Areas. If the practicalities of loading and unloading by the health centres staff needs to be assessed, this could be done with smaller local based trials operating within the existing drone legislation. With regards potential usage, this could be assessed using existing health and Oban hospital lab data.

In essence, it would seem quite possible that all of the answers that would be gained from this trial could be obtained in other ways that wouldn't create unnecessary additional dangers and inconvenience to other airspace users. A more open and meaningful stakeholder consultation process could perhaps consider such options?

In summary – I believe that the establishment of the TDAs should be refused on the grounds that they are not adequately justified by the current proposal (22 Jan 2020).

I do though understand that Skyports have a CAA 'Sandbox' application for a BVLOS in unsegregated airspace and in principal at least, feel that this would be a much more reasonable approach to the issue of remote deliveries. Indeed, I would much rather be sharing airspace with drones at 500ft as opposed to dodging clouds and mountains.

A thick, solid black horizontal bar used to redact a signature or name at the end of the text.

Response 60: Individual V

From: [REDACTED]
Sent: 31 January 2021 08:15
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: ACP-2020-099 Skyports Oban-Mull-Coll Stakeholder Engagement Reminder & Update

Hi [REDACTED]

Thank you for your email and your support. We are currently working with NATS to provide a DAAIS service with Scottish Information &/ Oban Information.

Kind regards,
[REDACTED]

From: [REDACTED]
Sent: 30 January 2021 13:20
To: [REDACTED]
Subject: RE: ACP-2020-099 Skyports Oban-Mull-Coll Stakeholder Engagement Reminder & Update

Hi [REDACTED]

With the changes you have made to the proposal I would support the ACP. As long as the crossing service is implemented with Scottish Information as well as Oban ATC the proposal looks good to me.

Thanks for taking everyone's comments into consideration.

Regards
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

From: [REDACTED]
Sent: 28 January 2021 16:32
Subject: ACP-2020-099 Skyports Oban-Mull-Coll Stakeholder Engagement Reminder & Update

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>

Response 61: Individual W

From: [REDACTED]
Sent: 19 January 2021 14:22
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Airspace Restrictions around Scotland
Attachments: ACP-2020-099 Skyports - Oban-Mull-Coll - Targeted Av Stakeholder Eng Material.pdf

Hi [REDACTED]

Thank you for your feedback in relation to this airspace change. I have attached the stakeholder engagement material for this ACP (ACP-2020-099) and now included you in our list of stakeholders and will ensure any future communications regarding this ACP are shared with you.

I have attempted to answer your questions below as best as possible:

- **Glenforsa** – At the time of our initial route analysis it was stated this airfield would be closed until 15th July, however we are now in touch with the person who runs this airfield and understand this information was from 2020 and requires updating. We are in the process of revising our routing further away from this airfield (also exploring TDA size reduction where feasible) and I hope to share some revisions and suggestions this Wednesday.
- **NOTAM activation (reduced hours)** – Currently NOTAMs will be issued 24hrs before any planned flights detailing which TDAs will be active and between what times and will also include a contact number for airspace users to get in touch with us. All TDAs not in use will be deactivated in ensure airspace is still available to all users. It is envisaged only one or two route will be active at any given time. Your point about reducing NOTAM activation time has also been noted, we are currently exploring this. To ensure flexibility is given to support the NHS during this pandemic we would potentially need to be available on the day for a given TDA (given hospital ad-hoc demands and opening hours), however we are trying to explore ways to reduce this.
- **Communications** - For information we currently have a Temporary Operating Instruction (TOI) with the emergency services (HEMS) where they can access our TDA via Scottish Information or Oban Information during their hours of operation, we are in discussions with NATS regarding this. Your point about communications via Glenforsa has also been noted (given the poor comms in the area).
- **ADS-B** – The drone vehicle we are using has ADS-B IN & OUT capability and I understand it to be able to be picked up by any aircraft with ADS-B IN capability. Please note that this is not a strategic mitigation and only used by us to improve situational awareness, we will always be operating within our active TDA. It has been suggested by another stakeholder that we include this information on the NOTAM, which is what we intend to do.

I will hopefully be in touch tomorrow to share some route revisions and suggestions based on all stakeholder feedback, including yours. Thank you for all your comments and helpful feedback.

Kind regards,

[REDACTED]
[REDACTED]

skyports.net



From: [REDACTED]
Sent: 18 January 2021 23:59
To: [REDACTED]
Subject: Airspace Restrictions around Scotland

Hi [REDACTED]

I am a GA pilot based in Strathaven and have major concerns around the Drone proposals you have submitted for mull and indeed your earlier submission for a zone around the Crinnan canal. Aviation is all about flying and we in Scotland have had many years of enjoyment flying around our beautiful country. I fly to Glenforsa around 12 times per year and have concerns around your airspace grab of most of my low level route. Strathaven airfield has a proud tradition of integrating all forms of aviation including drones, model aircraft, helicopters, microlights, paragliders and general aviation. We all integrate safely and have a large volume of movements per year without incident.

I assume like most like aircraft your drones are fitted with some form of electronic conspicuity like most light aircraft, which makes your proposal for a danger area even more absurd. Most pilots enjoy a safe low level flight around mull and to have this jeopardised for the sake of a few trial drone flights is unacceptable.

I am not a drone phobic and am quite happy to fly alongside them but have serious concerns around unwanted airspace restrictions that could happily be resolved due by a simple Notam rather than any form of airspace restriction.

One further point I would like to make is co-ordination for Drone operations should be made through both Oban and [REDACTED] at Glenforsa as most aircraft cannot communicate with Scottish information at low level in the area.

I await your responses with interest and look forward to seeing your drones from air at some point in the future.

kind regards

[REDACTED]

Ga pilot

Response 62: Individual X

From: [REDACTED]
Sent: 19 January 2021 16:07
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Objection to Object to ACP-2020-099 and ACP-2020-048

Hi again [REDACTED]

Apologies I forgot to mention ACP-2020-048 has been withdrawn and your objection to this ACP-2020-099 has been noted.

Kind regards,

[REDACTED]

From: [REDACTED]
Sent: 19 January 2021 16:05
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Objection to Object to ACP-2020-099 and ACP-2020-048

Dear [REDACTED]

Thank you for your email.

I have attached the stakeholder engagement material for this ACP (ACP-2020-099) and now included you in our list of stakeholders and will ensure any future communications regarding this ACP are shared with you. Please also note that any communications with us are shared with the CAA at the end of the engagement period in a summary report, so feel free to communicate with us (myself and Simon) directly going forward.

I have attempted to answer your questions below as best as possible:

- Glenforsa – At the time of our initial route analysis it was stated this airfield would be closed until 15th July, however we are now in touch with the person who runs this airfield and understand this information was from 2020 and requires updating. We are in the process of revising our routing further away from this airfield (also exploring TDA size reduction where feasible) and I hope to share some revisions and suggestions this Wednesday.
- TDA heights – We have kept our routing as close to 400ft AGL where possible, as in accordance with the CAA Drone Code, drones should operate at ideally <400ft to avoid other airspace users. All altitudes depicted are AMSL and may have variations due to terrain heights. We are currently reviewing the routing and altitudes to see if they can be reduced further.
- NOTAM (TDA activation period) - Currently NOTAMs will be issued 24hrs before any planned flights detailing which TDAs will be active and between what times and will also include a contact number for airspace users to get in touch with us. All TDAs not in use will be deactivated to ensure airspace is still available to all users. It is envisaged only one or two route will be active at any given time. To ensure flexibility is given to support the NHS during this pandemic we would potentially need to be available on the day for a given TDA (given hospital ad-hoc demands and opening hours), however we are trying to explore ways to reduce this. I hope to update you tomorrow.

- ADS-B and why a TDA is required – The drone vehicle we are using has ADS-B IN & OUT capability and I understand it to be able to be picked up by any aircraft with ADS-B IN capability. Please note that this is not a strategic mitigation and only used by us to improve situational awareness, we will always be operating within our active TDA. It has been suggested by another stakeholder that we include this information on the NOTAM, which is what we intend to do. Your points around other airspace users not being conspicuous are noted which is the primary reason we currently need to operate within a TDA, given the see and avoid requirement. Until UAS can comply with the requirements for flight in non-segregated airspace, BVLOS UAS flights outside permanently established segregated airspace may be accommodated through the establishment of segregated airspace on a temporary basis. Until the rules are changes this is the process we need to follow.
- Test over water and at night flights – Unless I have misunderstood, the majority of the test area is already over water. Thank you for your suggestion for operations at night, this is something being reconsidered however we are currently limited to the opening hours of each hospital and as I currently understand our drone doesn't have this approval from the CAA yet.

I will hopefully be in touch with you tomorrow to share further revisions/suggestions based on all stakeholder feedback, including yours. We also plan to extend engagement an additional week pending CAA approval.

Kind regards,

[Redacted signature]

skyports.net



This email is from Skyports Limited. Skyports Limited is a limited company registered in England and Wales with registered number 10755230. Our office is at Skyports, Unit LG.06, Edinburgh House, 170 Kennington Lane, London, SE11 5DP, United Kingdom. Our registered office is at Kingfisher House, Radford Way, Billericay, Essex, United Kingdom, CM12 0EQ. This message is intended solely for the addressee and is private and confidential. If you have received this message in error, please send it back to us, and immediately and permanently delete it. Do not use, copy or disclose the information contained in this message or in any attachment. Please note that neither Skyports Limited nor the sender accepts any responsibility for viruses and it is your responsibility to scan or otherwise check this email and any attachments.

From: [Redacted]
Sent: 18 January 2021 21:41
To: [Redacted]
Cc: [Redacted]
Subject: Objection to Object to ACP-2020-099 and ACP-2020-048

Dear Sirs

I would like to Object to ACP-2020-099 and ACP-2020-048. The latter seems to have had a very short consultation period but as it has not yet been implemented, I include it in my email and subject it to the same objection.

I am the owner of a light aircraft who regularly flies in the areas that are impacted by your proposals. Yes, COVID meant a severe limitation on our ability to fly freely throughout the United Kingdom, but I trust that will soon be an option and as such should be considered.

Having read your proposed TDAs to cover your commercial drone operations it seems to be unnecessarily close to an active GA airfield namely Glenforsa, and the amount of airspace that is required in width and height seems excessive especially if one considers the accuracy at which drones seem to be able to operate e.g. along clearly defined GPS routes and a low altitude. Also the TDA's give no hint on the duration let alone activation times.

If Glenforsa airfield was to be considered as a "Protected Aerodrome" it should have a 2.5nm radius zone upto 2000ft where no drones are permitted to fly without specific permission. This is excluded from your TDA proposal.

ADS-B is technology that is not yet universally applied and the mention of it misses its relevance as many aircraft are not equipped to transmit or receive ADS-B information. Whereas the recent initiative by the CAA to incentivise aircraft owners to increase visibility through the purchase of Electronic Conspicuity devices, the support was offered to a range of systems so not sufficient for your needs.

Your proposals have too big an impact on other airspace uses, not enough has been done to include a wider audience in the consultation process with airspace users from all over the country potentially impacted by this and it seems that little thought was given to alternatives! Why, for example isn't more of the test area above water and why couldn't the test be conducted at night?

With kind regards

████████████████████

Response 63: Individual Y

From: [REDACTED]
Sent: 20 January 2021 11:12
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: ACP 2020-099 UAS BVIOS
Attachments: ACP-2020-099 Skyports - Oban-Mull-Coll - Targeted Av Stakeholder Eng Material.pdf

Dear [REDACTED]

Thank you for your feedback in relation to this airspace change, your objection has been noted. I have attached the stakeholder engagement material for this ACP (ACP-2020-099) and now included you in our list of stakeholders and will ensure any future communications regarding this ACP are shared with you. I have responded to Mr Hamish Mitchell's queries in detail today and should you have any further concerns do get in touch.

I will be in touch later today regarding the extended (1 week) engagement period and will hopefully be able to share some route revisions and further suggested by the end of the week.

Kind regards,

[REDACTED]

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From: [REDACTED]
Sent: 20 January 2021 10:06
To: [REDACTED]
Cc: [REDACTED]
Subject: ACP 2020-099 UAS BVIOS

Objection.

I concur with the objection made by experienced seaplane pilot and Air Traffic Controller [REDACTED] to the ACP creation of a danger area to trial Covid vaccine deliveries.

There are no national or international protocols yet in place to facilitate a private company establishing drone corridors and danger areas for commercial purposes. Even the Chinese CAAC have yet to determine the criteria for the commercial operation of UAV or UAM vehicles. (See Aviation Week Jan 2021)

The development of UAV and UAM vehicles has not reached the point at which they can safely be flown out of sight of the controller. Also, they do not yet have a reliable collision avoidance system or terrain and obstacle clearance system. This is why a Danger Area is required - they are, as yet, dangerous. To all intents and purposes they are invisible to air pilots.

UAV's undoubtedly have a future. But as newcomers, it is incumbent upon them to find ways of safely operating alongside existing airspace users without depriving those users of the limited airspace now left for VFR flight. There are plenty of military danger areas across Scotland where these experiments could be flown. The proposed routing is one of the most popular areas for touring VFR pilots, mountain flying training and seaplane instruction.

Skyport is opportunistic by using the Covid emergency as a short cut to create precedents for a form of operation still in its infancy. There is nothing in the proposal that could not be achieved by helicopter, without the need for a DA. If the proposed operation were successful, there would be an expectation by the NHS that ALL vaccine deliveries across Scotland was possible, resulting in swathes of drone corridors and even more DA's.

[REDACTED]

Retired [REDACTED] pilot.

Response 64: Individual Z

From: [REDACTED]
Sent: 21 January 2021 00:08
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: TDA proposal for UAS BVLOS in Segregated Airspace (Oban-Isle of Mull-Coll)
Attachments: ACP-2020-099 Skyports - Oban-Mull-Coll - Targeted Av Stakeholder Eng Material.pdf

Hi [REDACTED]

Thank you for your feedback in relation to this airspace change, your objection has been noted. I have attached the stakeholder engagement material for this ACP (ACP-2020-099) and now included you in our list of stakeholders and will ensure any future communications regarding this ACP are shared with you.

The current stakeholder engagement period was due to end on Sunday 24th January 2021 but we have decided to extend the deadline by a full week to Sunday **31st January 2021**. The amended change timeline has been reviewed and approved by the CAA and can be found on the airspace change portal for this change - <https://airspacechange.caa.co.uk/PublicProposalArea?plD=330>

I have attempted to answer your other questions below as best as possible:

- Glenforsa – At the time of our initial route analysis it was stated this airfield would be closed until 15th July, however we are now in touch with the person who runs this airfield and understand this information was from 2020 and requires updating. We are in the process of revising our routing further away from this airfield (also exploring TDA size reduction where feasible) and I hope to share some revisions and suggestions this week.
- TDA heights and size – We have kept our routing as close to 400ft AGL where possible, as in accordance with the CAA Drone Code, drones should operate at ideally <400ft to avoid other airspace users. All altitudes depicted are AMSL and may have variations due to terrain heights. We are currently reviewing the routing and altitudes to see if they can be reduced further.
- NOTAM activation duration - Currently NOTAMs will be issued 24hrs before any planned flights detailing which TDAs will be active and between what times and will also include a contact number for airspace users to get in touch with us. All TDAs not in use will be deactivated to ensure airspace is still available to all users. It is envisaged only one or two route will be active at any given time. To ensure flexibility is given to support the NHS during this pandemic we would potentially need to be available on the day for a given TDA (given hospital ad-hoc demands and opening hours), however we are trying to explore ways to reduce this.

Thank you very much for your feedback [REDACTED] it is very much appreciated and I hope to be in touch again this week to share amended routes together with any further suggestions/revisions based on all stakeholder feedback, including yours.

Kind regards,

[REDACTED]

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From: [REDACTED]
Sent: 20 January 2021 23:15
To: [REDACTED]
Subject: re: TDA proposal for UAS BVLOS in Segregated Airspace (Oban-Isle of Mull-Coll)

Hi [REDACTED]

I was prompted to write to you when I became aware of the above TDA proposal. I've had a good read of your airspace change proposal and I must say I am, unfortunately, disappointed that this is what you have come up with. There seems to have been little attempt to take account of existing GA traffic in the area and no attempt as far as I can see to integrate with the existing traffic.

We GA pilots have to accept that drones sharing our airspace are a fact of life (in fact, many of my fellow light aircraft pilots are also drone pilots) so I think it only fair that drone operators (both commercial and amateur alike) should recognise that we all have an equal right to use the existing airspace fairly and always with others in mind.

That said, I would like to specifically object to a number of particular points in your proposal:

- The extremely short consultation period is insufficient to capture as wide an audience as possible. I urge you to go out again for further consultation once this period ends.
- One of your TDAs goes through the Glenforsa circuit, which when activated, would make operations there impossible. Remember that as well as being a popular destination for GA pilots to visit when planned, Glenforsa is also a necessary diversion airfield. It would be irresponsible to "cut off" this airfield for use in an emergency.
- TDAs rising to 950ft seems overkill for drone operations (although I understand your need for Line of Sight). The actual heights you need should be re-thought to consider what the MINIMUM is that you need, not the MAXIMUM you think you can get away with. Please consider the needs of those others who co-exist in the same airspace.
- Blocking out large areas on the off-chance that you would receive an NHS tasking is a disproportionate use of airspace and I would be embarrassed if I were in your shoes. I urge you to think again - removing large areas of the air for an entire day when you may only have 1 flight is ridiculous.

In summary, I don't think your application in its current form is proportionate, necessary and fair to other airspace users.

I would be please to support a resubmitted application that took your needs into account AS WELL AS those of existing airspace users. As I said earlier, I have accepted that drones have as much a right to the sky as I have (not more,or less, but the same).

Response 65: Individual AA

From: [REDACTED]
Sent: 21 January 2021 16:20
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: CP- 2020-099 UAS BVLOS in Segregated Airspace (Oban-Isle of Mull-Coll)

No problem [REDACTED] happy to clarify anything unclear. The new revision should be more transparent but do get in touch if anything further is unclear.

Be in touch soon.

From: [REDACTED]
Sent: 21 January 2021 15:55
To: [REDACTED] >
Cc: [REDACTED] >
Subject: Re: CP- 2020-099 UAS BVLOS in Segregated Airspace (Oban-Isle of Mull-Coll)

Thanks for the quick response and I look forward to seeing the changes, indeed the <400ft limitation is less of a concern but was interpreted as being 950ft over the water hence concern

On Thu, 21 Jan 2021 at 15:47, [REDACTED] wrote:

Dear [REDACTED]

Thank you for your feedback in relation to this airspace change, your objection has been noted. I have attached the stakeholder engagement material for this ACP (ACP-2020-099) and now included you in our list of stakeholders and will ensure any future communications regarding this ACP are shared with you.

The current stakeholder engagement period was due to end on Sunday 24th January 2021 but we have decided to extend the deadline by a full week to Sunday **31st January 2021**. The amended change timeline has been reviewed and approved by the CAA and can be found on the airspace change portal for this change - <https://airspacechange.caa.co.uk/PublicProposalArea?plD=330>

I have attempted to answer your questions below as best as possible:

- Glenforsa – At the time of our initial route analysis it was stated this airfield would be closed until 15th July, however we are now in touch with the person who runs this airfield and understand this information was from 2020 and requires updating. We are in the process of revising our routing further away from this airfield (also exploring TDA size reduction where feasible) and I hope to share some revisions and suggestions this week.

- TDA heights and size – We have kept our routing as close to 400ft AGL where possible, as in accordance with the CAA Drone Code, drones should operate at ideally <400ft to avoid other airspace users. All altitudes depicted are AMSL and may have variations due to terrain heights. We are currently reviewing the routing and altitudes to see if they can be reduced further.

Thank you for the information provided, I shall be in touch again this week with route amendments and further suggestions based on all stakeholder feedback.

Kind regards,

[Redacted signature]

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From: [Redacted]
Sent: 21 January 2021 10:36
To: [Redacted] >
Subject: CP- 2020-099 UAS BVLOS in Segregated Airspace (Oban-Isle of Mull-Coll)

I wish to add my objections to your proposal which on the face it does nothing but segregate Mull and in particular (Glenforsa) from General Aviation users who frequent the area.

I can appreciate it is on the face of it only a temp trial, but in my experience once set up these things rarely just go away and the apparent approach to sneaking this under the radar with it only coming to light very late in the day and using Covid as some kind of excuse to rush it through does nothing to allay this concern.

Apart from landing and taking off from an airfield that your proposal appears to completely ignore, I operate predominantly very low level 500-1500 ft which is likely to come in direct conflict so would be very much affected as will all pilots on the west coast.

████████████████████

████████████████████

Response 66: Individual AB

From: [REDACTED]
Sent: 21 January 2021 16:59
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: ACP-2020-099 UAS BVLOS in Segregated Airspace (Oban-Isle of Mull-Coll)
Attachments: ACP-2020-099 Skyports - Oban-Mull-Coll - Targeted Av Stakeholder Eng Material.pdf

Dear [REDACTED]

Thank you sincerely for taking the time to detail all your concerns regarding this ACP, your strong objection as the ACP currently stands is also noted. We fully agree that aviation should be safe and efficient for all users and we are keen to work with experienced stakeholders like yourself to make this happen.

I have attached the stakeholder engagement material for this ACP (ACP-2020-099) and now included you in our list of stakeholders and will ensure any future communications regarding this ACP are shared with you.

The current stakeholder engagement period was due to end on Sunday 24th January 2021 but we have decided to extend the deadline by a full week to Sunday **31st January 2021**. The amended change timeline has been reviewed and approved by the CAA and can be found on the airspace change portal for this change - <https://airspacechange.caa.co.uk/PublicProposalArea?pid=330>

I have attempted to share any further details (where possible) to your response below. In relation to:

- Point 1 - This stakeholder engagement exercise is related to and limited to enabling COVID-19 response for the NHS. Any future operations we plan to carry out would need to be discussed with the CAA first to determine what the process requirements will be, if any, to enable them.
- Point 2 – We have kept our routing as close to 400ft AGL where possible, as in accordance with the CAA Drone Code, drones should operate at ideally <400ft to avoid other airspace users. All altitudes depicted are AMSL and may have variations due to terrain heights. We are currently reviewing the routing and altitudes to see if they can be reduced further.
- Currently NOTAMs will be issued 24hrs before any planned flights detailing which TDAs will be active and between what times and will also include a contact number for airspace users to get in touch with us. All TDAs not in use will be deactivated to ensure airspace is still available to all users. It is envisaged only one or two routes will be active at any given time. To ensure flexibility is given to support the NHS during this pandemic we would potentially need to be available on the day for a given TDA (given hospital ad-hoc demands and opening hours), however we are trying to explore ways to reduce this.
- For information we currently have a Temporary Operating Instruction (TOI) with the emergency services (HEMS) where they can access our TDA via Scottish Information or Oban Information during their hours of operation, we are in discussions with NATS regarding this.
- Point 3 - At the time of our initial route analysis it was stated this airfield would be closed until 15th July, however we are now in touch with the person who runs this airfield and understand this information was from 2020 and requires updating. We are in the process of revising our routing further away from this airfield (also exploring TDA size reduction where feasible) and I hope to share some revisions and suggestions this week.

- Point 4 – In addition to the detail given about NOTAMs in point 2, our drones are currently not certified by the CAA to fly at night and given the NHS hospital opening hours and requirements of the service, night time operations are currently not feasible.
- Point 5- Fully agree in integration rather than segregation, and believe this to be the CAA medium/long term plan. Currently we have to operate within the rules which state, until UAS can comply with the requirements for flight in non-segregated airspace, BVLOS UAS flights outside permanently established segregated airspace may be accommodated through the establishment of segregated airspace on a temporary basis.
- Point 6 – Really interesting points and suggestions. What I can share is that the drone vehicle we are using has ADS-B IN & OUT capability and I understand it to be able to be picked up by any aircraft with ADS-B IN capability. Please note that this is not a strategic mitigation and only used by us to improve situational awareness, we will always be operating within our active TDA. It has been suggested by another stakeholder that we include this information on the NOTAM, which is what we intend to do.
- Point 7 – Thank you for the list of stakeholders identified. We are in touch with all now I believe and will reach out to any that are not included on the list.
A timeline for this airspace change, including period of targeted engagement with relevant aviation stakeholders was agreed with the CAA. We have subsequently agreed with the CAA an extension of the targeted engagement window for this ACP by a week. Regarding communication we are looking at other channels to explore in the future and there have been some great suggestions already by stakeholders (local newspapers, GA magazines etc).

Thank you for the offer to visit, I will pass that on to the team and it would also be great to show you in person the drone itself and its capabilities (all being well).

I plan to update you again this week with revised route/suggestions based on all stakeholder feedback, including yours.

██████████ it has been a pleasure to read your suggestions and once again thank you for the time you have taken to compile them.

I shall be in touch soon.

Kind regards,

████████████████████
████████████████████

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From: [REDACTED]
Sent: 21 January 2021 16:05
To: [REDACTED]
Subject: ACP-2020-099 UAS BVLOS in Segregated Airspace (Oban-Isle of Mull-Coll)

Dear [REDACTED]

I must start by stating I am both a Private Pilot and a Licenced Aircraft Maintenance Engineer for a large UK airline, so I understand commercial, technical and local aspects to this issue. I have over 100 hours in command of aircraft, mostly around the Western Isles, with the privilege hundreds more as a passenger in the area, combined with technical knowledge of state-of-the art Boeing aircraft in a commercial operation.

All of the training I have completed in aviation has safety as a priority, looking at ways to eliminate risk and avoid pointing blame. Your proposals totally contradict this, failing to fully utilise technology or even comply with good airmanship. It is for this reason I strongly oppose the proposed TDA in the Oban / Mull area as it stands. Please see points below;

- 1) **NHS** - I appreciate NHS demands, particularly for the island communities. However I do not accept Covid-19 as an acceptable reason to carve up airspace, mainly as the pandemic started over a year ago. By the time 'trials' are complete, it will be too late for drones to be used beneficially. Is this therefore a convenient excuse to grab airspace with public support?
If Covid-19 is such a demand, why not use existing infrastructure in the area such as the Glenforsa airfield? Examples include Loganair or Hebridean aircraft, helicopters and other light aircraft, all of which are being underused due to restrictions.
- 2) **Pilot Safety & Workload** – What, if any, consideration has been given to this? I appreciate we have tools that make NOTAM's easier to obtain, but given many users of the airspace may fly for 3 or more hours to get to Glenforsa, how do you expect pilots to arrive with the latest information? I can tell you, mobile signal in the area is non-existent, VHF radio communication is poor north of Bute, weather is changeable and the terrain is not flat. This added to the workload of single crew, as they prepare for arrival, often flying by hand? I refer you to the 'Swiss Cheese' model for Human Performance, as holes line up, you get deeper into the problem.
What is a pilot to do if they cannot maintain VMC above a TDA with mountains either side?
What is a pilot to do if they experience technical difficulties or equipment failure?
- 3) **Impact on Local Business** – I am pleased to see you have included the Glenforsa Airfield as a stakeholder, however I think you underestimate the effect the TDA will have on them. It will basically close the airfield when active. Again given weather conditions in the area time constraints on arrivals and departures could have an adverse effect on safety by forcing pilots into difficult decisions. It is also one of a few areas in the Inner Hebrides suitable for diversion, where a TDA could discourage its use. Oban (North Connell) nearby could also see disruption to traffic patterns, particularly the common join points West of Oban Town and Lismore Islands.
The two airports realistically operate in synchronisation, both depending on each other for business. While private aviation is by no means the lifeline for Western Scotland, it should not be underestimated the direct and indirect income that it generates for the area, particularly how accessible Oban and the Islands become. Other local operators have been missed, one more notable I believe has contacted you and has also written an article on the matter. These can be seen in point 7.
- 4) **Operating Hours** - One thing that must be avoided is large block of NOTAM time that is then not used and the same in the middle of the day. As previously mentioned this could force pilots into making poor decisions to avoid being blocked in by the TMA. Further, regular blocks at either end of the day will be easiest to manage and comminate.
Can a solution be found where TDA are operated outside of Oban opening times? As this is generally the biggest restriction in the area. For example, if Oban was open 0800-1700Z, operated drone flights before

0700Z and after 1900Z? Given the extended daylight hours this should not be a problem. Why drones cannot be flown at night is a nonsense. If anything they should be more visible with LED anti-collision lights, and Day or Night they don't "see" anyway.

5) **Integrate not segregate** – I think this will tie with my next point, but why are drones forcing new airspace creations, rather than being made to operate and comply with existing users and procedures. We see in the world of automotive automation vehicles being tested behind closed doors to the interact with existing users. Vehicles on the road are still operated by a driver while the technology is developed, we don't see stretches of A1(M) with lane 1 reserved for driverless vehicles.

6) **Use of Technology** – Relating to integration. I believe we have technology available now for all aircraft to be able to see a live display of others in their proximity. We see it with PilotAware integration into Sky Demon, where ADS-B OUT information is used to show aircraft data on a live map and older PCAS units. Further, ADS-B IN is used in modern commercial aircraft with TCAS to alert and if necessary make control inputs to avoid collisions.

Even more advance is some of the Boeing 787 technology. The aircraft can receive a message from ATC for it then to transferred into the autopilot as a command. Would it not be advantageous to all airspace users for this to be implemented to all drones? Drones could then operate anywhere required, and truly help the NHS, with pilots of any size aircraft having the knowledge they could see and be seen by drones?

Could technology also be used to route drones where fewest aircraft operate? The Sound of Mull is very popular with light aviation and military fast jets. A corridor at higher altitudes, say 4000', may prove less restrictive for aviation, particularly approaches into airports. Drones ability to take-off and climb vertically then transit to their destination could lift the routing above levels commonly used to general aviation, yet below commercial aviation. I don't see why drones need to remain in VMC, so this eliminates the problem if aircraft descending into a TMA to remain clear of cloud. This should also give better communication with drones. Those wishing to transit above can more easily plan around higher level corridors

7) **Identified Stakeholders** – You seem to miss some key local and aviation parties in this list and I must add very poor circulation through the aviation community you have included. Again is this to grab the airspace without people noticing?

Some key parties I think should be contacted include;

Oban Airport – ask who visits, when, why and where they fly.

Hebridean Air Services – some of the best local pilots and frequent airspace users. Ask about flying in the area.

Caledonian Macbrayne Ferries – will this interfere with their routing and communication?

Scotia Seaplane LTD – a very experienced local pilot and Scottish Controller

HIAL (Highlands & Islands Airports) - ask who visits, when, why and where they fly.

I hope there is common ground to all of the points raised, to enable safe and efficient aviation for all. There is no doubt drones will be utilised more in the future, but process should not be rushed, falsely advertised or impact on other airspace users.

Before any decisions are made, I urge you to visit the area in a light aircraft. Not only will it be an incredible experience, it will brings to light some of the points I have raised today.

Kind Regards

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████████████████████
████████████████████

Response 67: Individual AC

From: [REDACTED]
Sent: 22 January 2021 14:09
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: ACP- 2020-099 UAS BVLOS in Segregated Airspace (Oban-Isle of Mull-Coll)
Attachments: ACP-2020-099 Skyports - Oban-Mull-Coll - Targeted Av Stakeholder Eng Material v2.0.pdf

Dear [REDACTED]

Thank you for taking the time to detail all your concerns regarding this ACP. I have attached the latest stakeholder engagement material for this ACP (ACP-2020-099), which was sent out today (including revisions based on current stakeholder feedback which aligns with yours) and now included you in our list of stakeholders and will ensure any future communications regarding this ACP are shared with you.

I will also share the cover email below, please note the deadline has been extended to **31 January 2021**.

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) which 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 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:

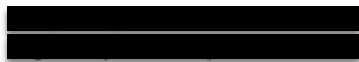
- o We have provided unmanned aircraft capabilities and limitations.

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.

Kind regards,



skyports.net



From: [REDACTED]
Sent: 21 January 2021 16:38
To: [REDACTED]
Cc: [REDACTED]
Subject: ACP- 2020-099 UAS BVLOS in Segregated Airspace (Oban-Isle of Mull-Coll)

Dear Skyports

I am the owner of EV97 Eurostar [REDACTED] based at Perth and would like to oppose the proposal in its current form which I believe is something that has not been thought out properly. During your planning period there was considerable reduction in GA flying due to the Covid restrictions put in place. This would give you a false representation of how active certain parts of your proposal are to GA. During the season from April until October the airspace around the Scottish Isles is especially attractive to us and Glenforca is a jewel in the GA world. With the beautiful scenery and a hotel on the field it is an airfield that private pilots from all over the UK love to visit. Your proposal in its current form would make planning a trip to this area unpredictable with the chance that the airspace may be temporarily closed to us. The proximity to the Glenforca circuit is something I consider to be highly dangerous, and would effectively close the airfield when the TDA was active.

I feel that due to Covid the proposal has been rushed through and GA especially will be the long term losers over these plans.

Regards

[REDACTED]

Response 68: Individual AD

From: [REDACTED]
Sent: 04 February 2021 21:03
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: ACP-2020-099 Objection

Please add the following to the consultation responses.

Llanbedr has operated a TDA for drone operations by a commercial operator for around four years. In that time no consideration has been given to the integration of drone operations into Class G airspace.

An application has been made by the commercial operator to make the TDA a permanent Danger Area thus robbing General Aviation of airspace allocated for all airspace users.

Without a clear airspace user integration strategy, this application, ACP-2020-099, must be turned down. The creeping introduction of Lower Airspace Danger Areas will force General Aviation into a smaller and smaller operational space.

Any committee member supporting this application will be held to account for willfully endangering the safety of General Aviation traffic in Class G airspace.

[REDACTED]

Sent from [REDACTED]

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

From: [REDACTED]
Date: 29/01/2021 12:06 (GMT+00:00)
To: [REDACTED]
Cc: [REDACTED] >
Subject: RE: ACP-2020-099 Skyports Oban-Mull-Coll Stakeholder Engagement Reminder & Update

Hi [REDACTED]

Absolutely, we are compiling all issues relating to this ACP and welcome working together on this. Thank you.

Kind regards,

[REDACTED]

From: [REDACTED]
Sent: 28 January 2021 18:13
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: ACP-2020-099 Skyports Oban-Mull-Coll Stakeholder Engagement Reminder & Update

Thank you for the updated response.

I see that only a selected number of issues are referred to in this document.

All of the issues should be included, together with your response.

We should work together to ensure that all of the issues are covered. I believe that the consultation period will only be complete when that is done.

Regards, [REDACTED]

From the mobile of [REDACTED]

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

From: [REDACTED]
Date: 28/01/2021 16:32 (GMT+00:00)
To:
Subject: ACP-2020-099 Skyports Oban-Mull-Coll Stakeholder Engagement Reminder & Update

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:

From: [REDACTED]
Sent: 28 January 2021 07:57
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Objection to the establishment of a TDA ACP-2020-099

Please note that my thoughts are distributed widely and are free for others to republish as they see fit. I welcome all debate.

Thank you for the link,

My further objection is in relation to a section of that text which I have replicated after my signature below.

It does use the word normally, which indicates that there will be occasions where the operator may deviate from the norm.

In any case there are options which do not need reservation of a block of airspace.

The CAA has a policy of keeping the volume of controlled airspace to the minimum (see below).

The submission by SkyPort offers no argument that conclusively demonstrates that controlled airspace is the only option that will work for this operation.

We have no detail to describe the systems on board the drone to help us to understand its limitations and capabilities.

This ACP does not deal with the stakeholder concerns in a satisfactory manner and I urge the CAA to reject it on the following grounds.

In the event that this process was subject to independent review it would be found to be unbalanced in favour of a solution necessitating controlled airspace.

Regards

[REDACTED]

BVLOS flight will normally require either:

- a technical capability which is equivalent to the method the pilot of a manned aircraft uses to 'see and avoid' potential conflicts - this is referred to as a Detect and Avoid (DAA) capability
- a block of airspace to operate in which the unmanned aircraft is 'segregated' from other aircraft - because other aircraft are not permitted to enter this airspace block, the unmanned aircraft can operate without the risk of collision, or the need for other collision avoidance capabilities
- clear evidence that the intended operation will have 'no aviation threat' and that the safety of persons and objects on the ground has been properly addressed.

The CAA has a policy of keeping the volume of controlled airspace to the minimum necessary to meet the needs of UK airspace users and to comply with its international obligations.'. <https://www.caa.co.uk/Commercial-industry/Airspace/Airspace-change/Airspace-Change/>

From the mobile of [REDACTED]

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

From: [REDACTED]
Date: 27/01/2021 10:21 (GMT+00:00)
To: [REDACTED]

Cc: [REDACTED]
Subject: RE: Objection to the establishment of a TDA ACP-2020-099

Morning [REDACTED]

That's all understood and your objection has been noted. I have included a link below from the CAA website, which sets out the two main operating principles of UAS in the UK and explains more.

MailScanner has detected a possible fraud attempt from "gbr01.safelinks.protection.outlook.com" claiming to be
<https://www.caa.co.uk/Consumers/Unmanned-aircraft/Our-role/An-introduction-to-unmanned-aircraft-systems/>

Kind regards,

[REDACTED]

From: [REDACTED]
Sent: 26 January 2021 14:46
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Objection to the establishment of a TDA ACP-2020-099

I'm sorry, but I'm really not happy about this.

You say....

"To integrate with other airspace operators, UAS operators must ensure that their aircraft can demonstrate an equivalent level of compliance with the rules and procedures that apply to manned aircraft"

Under which flight rules will you be operating and why?

How will you demonstrate that you are adhering to these rules?

If you adhere to your chosen flight rules you wouldn't need a TDA.

[REDACTED]

From the mobile of [REDACTED]

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

From: [REDACTED]

Date: 26/01/2021 13:59 (GMT+00:00)

To: [REDACTED]

Cc: [REDACTED]
[REDACTED]

Subject: RE: Objection to the establishment of a TDA ACP-2020-099

Thank you very much for the extension to the consultation period and I welcome the practical changes to your plans.

I also thank you for the update, which sadly only seems to add fat to the fire.

Please note that my thoughts are distributed widely and are free for others to republish as they see fit. I welcome all debate.

It seems that the CAA have persuaded the UK parliament to sign off an amendment to the ANO, to become law as late as 31st December 2020 for the operation of UAS.

I've cc'd the LAA into this email as I'm surprised that they haven't kept a watching brief on this as it does seem to me to have slipped in under the RADAR.

On reading this legislation it makes much reference to earlier legislation which leaves the reader in some doubt as to its intention.

<https://www.legislation.gov.uk/uksi/2020/1555/contents/made>

<https://www.caa.co.uk/Consumers/Unmanned-aircraft/Our-role/Updates-about-drones/>

Even the CAA document Air Navigation Order 2020 Amendment Guidance for unmanned aircraft system users (CAP2013) offers some caution...

It starts with "this document explains the amendment" and then launches into legal rhetoric. You'll forgive me for believing that it is inadequate.

It also says

"While the amendment has introduced six new articles with completely new text, the meaning of some other changes cannot be fully understood by reading the SI on its own".

The explanation to the amendment is that it's really really hard to understand I bet the MPs who voted on this had no idea what they were passing.

Since the ink is barely dry on this legislation and clearly it's not easy to understand from the above statement from the CAA, I would say it is optimistic to want to undertake an operation of your stature without the stakeholders having the opportunity to try to understand the rushed legislation and what its intention is.

What I can say is that my objection continues on the basis that I have not had the opportunity to fully assess the impact of the legislation you rely on, against the needs of other airspace users.

Is there any derogation of the rules of the air as other airspace users know them for commercial drone operations?

What steps have been taken to model drone operation (by simulation software for instance?)

How do we know how well your operational model meets the new regulations. If you made clear your interpretation of each regulation and how you meet it then both your stakeholders and the CAA would be able to arrive at an informed view.

There is a great deal of information to absorb and even with your extension, it is insufficient for the level of complexity.

Had the new rules been simple and not clouded by jargon then we could stride forward, but I feel that all parties promoting this have not done enough to satisfy fair and reasonable scrutiny.

Regards

[REDACTED]

From the mobile of [REDACTED]

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

From: [REDACTED]

Date: 23/01/2021 11:01 (GMT+00:00)

To: [REDACTED]

Cc: [REDACTED]

Subject: RE: Objection to the establishment of a TDA ACP-2020-099

Morning [REDACTED]

I didn't receive this but have it now and your objection has been noted. Thank you for your comments and thoughts on this ACP. I have attached the latest stakeholder engagement material for this ACP (ACP-2020-099), which was sent out yesterday (including revisions based on current stakeholder feedback) and now included you in our list of stakeholders and will ensure any future communications regarding this ACP are shared with you.

I hope this answers the majority of your concerns, if not please do get back to us. We fully agree in integration rather than segregation, and believe this to be the CAA medium/long term plan. Currently we have to operate within the rules which state, until UAS can comply with the requirements for flight in non-segregated airspace, BVLOS UAS flights outside permanently established segregated airspace may be accommodated through the establishment of segregated airspace on a temporary basis.

I also share the cover email below, please note the deadline has been extended to **31 January 2021**.

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) which 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:

MailScanner has detected a possible fraud attempt from "gbr01.safelinks.protection.outlook.com" claiming to be <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 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.

Kind regards,

[Redacted signature]

MallScanner has detected a possible fraud attempt from "gbr01.safelinks.protection.outlook.com" claiming to be skyports.net



From: [REDACTED]
Sent: 17 January 2021 16:56
To: [REDACTED]
Cc: [REDACTED]
Subject: Objectiion to the establishment of a TDA ACP-2020-099

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

Re:UAS BVLOS in Segregated Airspace (Oban-Isle of Mull-Coll)

Airspace change ID: ACP-2020-099 ACP-2020-048

I object to the establishment of the temporary danger area above, in the vicinity of Oban on the following grounds.

1. "The CAA has a policy of keeping the volume of controlled airspace to the minimum necessary to meet the needs of UK airspace users and to comply with its international obligations.'. **MailScanner has detected a possible fraud attempt from "gbr01.safelinks.protection.outlook.com" claiming to be <https://www.caa.co.uk/Commercial-industry/Airspace/Airspace-change/Airspace-Change/>**
2. Commercial operation of drones must be developed in a way that creates minimum disruption to other Airspace users.
3. If commercial drone operators habitually demand a TDA in the lower 1000 ft of airspace, then: -
 - a. a. The UK will become a mosaic of pop up danger areas which deny access to lower airspace and airports.
 - b. b. If this concept was extended across the UK, in certain areas, sections of aviation will be compressed into a horizontal space between 1000 ft and 1500 ft. If the CAA were to apply its Take 2 principal airspace users would be obliged to fly in a 100ft vertical section of airspace.
4. The application must be refused until such a time as the need for a TDA is clearly proven. The carriage of goods with biomedical properties over the sea does not constitute sufficient grounds for the establishment of a TDA. The same goods transported by lorry or ship do not impact the environment in which it is transported.
5. Carriers (such as Royal Mail) publish conditions under which consignments of goods may be transported to ensure that safety both inside and outside of their supply chain is assured. It is the carrier's responsibility, not the responsibility of other users of a national asset to provide that protection.

MailScanner has detected a possible fraud attempt from "gbr01.safelinks.protection.outlook.com" claiming to be <https://www.google.com/url?sa=t&source=web&rct=j&url=https://www.royalmail.com/sites/default/files/royal-mail-prohibited-and-restricted-items-nov-23-2018--->

[23410530.pdf&ved=2ahUKEwiMkvTlqaPuAhWTgVwKHgGmBHEQFjACegQIGRAB&usg=AOvVaw18pJiSN- q- VMw9cP5zPK2](#)

6. That the operator is conducting proving trials is not a compelling argument for the establishment of a TDA, The LAA, for example, performs its test flights on aircraft types without the need for a TDA

I have no objection to commercial drone flights where :-

1. The operator takes responsibility for keeping the environment in which they fly safe from the impact of their operation.
2. The operator mitigates the risk of the cargo they carry.

Within these criteria there is no need for a Temporary Danger Area.

[REDACTED]

Sent from [REDACTED]

Response 69: Individual AE

From: [REDACTED]
Sent: 22 January 2021 16:50
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: ACP-2020-099 UAS BVLOS in Segregated Airspace (Oban-Isle of Mull-Coll)
Attachments: ACP-2020-099 Skyports - Oban-Mull-Coll - Targeted Av Stakeholder Eng Material v2.0.pdf

Dear [REDACTED]

Thank you for taking the time to detail all your concerns regarding this ACP, your objection has been noted. I have attached the latest stakeholder engagement material for this ACP (ACP-2020-099), which was sent out today (including revisions based on current stakeholder feedback which aligns with yours) and now included you in our list of stakeholders and will ensure any future communications regarding this ACP are shared with you.

I hope this answers the majority of your concerns, if not please do get back to us.

I also share the cover email below, please note the deadline has been extended to **31 January 2021**.

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) which 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 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.

Kind regards,

[Redacted signature]

skyports.net



From: [REDACTED]
Sent: 22 January 2021 15:29
To: [REDACTED]
Cc: [REDACTED]
Subject: ACP-2020-099 UAS BVLOS in Segregated Airspace (Oban-Isle of Mull-Coll)

[REDACTED]

I write in response to ACP-2020-099 - UAS BVLOS in Segregated Airspace (Oban-Isle of Mull-Coll)

I object the proposal, although would like to make it clear that I look forward to a time when UAS can integrate with General Aviation.

Section 1.2 states that you intend to integrate with aviation stakeholders. The TDA proposed does not integrate, it prohibits general aviation. The route that you propose to the North of Mull is a well-used area (when there is not a lockdown) and also cuts through the already established Glenforsa Airfield circuit/rejoin. This route is used when aircraft travelling south from the likes of Skye when there is a low cloud base and pilots need to fly through the hills lower than normal to get back to the mainland. The options for these pilots to route to the West is not advisable as it takes them farther away from the mainland (rescue services in case of incident and diversion airfields). A high number of private GA pilots are also not instrument rated or their private aircraft are not equipped for instrument flying so they cannot climb up through the cloud to get back to the mainland.

The proposed TDA would prevent operations at Glenforsa airfield, removing income from the hotel owner.

5.1 states that the reduced period is sufficiently proportional to the size of the change. How can you establish the size of the change when you haven't contacted the majority of GA stakeholders in the area?

Kind regards,

[REDACTED]

[REDACTED]

Response 70: Individual AF

From: [REDACTED]
Sent: 22 January 2021 18:26
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Objection to ACP-2020-099
Attachments: ACP-2020-099 Skyports - Oban-Mull-Coll - Targeted Av Stakeholder Eng Material v2.0.pdf

Dear [REDACTED]

Thank you for taking the time to detail all your concerns regarding this ACP. I have attached the latest stakeholder engagement material for this ACP (ACP-2020-099), which was sent out today (including revisions based on current stakeholder feedback) and now included you in our list of stakeholders and will ensure any future communications regarding this ACP are shared with you. I hope this will answer your concerns raised.

On your final point we can't speak specifically to details of the NHS supply chain as this is based on confidential discussions, however I can provide some general comments on your questions. The NHS supply chain in the Argyll & Bute region is quite varied with different modes of transport used depending on the specific medical facility such as vans, ferries, planes and Royal Mail pickup – often a combination of multiple of these. In addition other factors such as: time of year, time at which sample was taken, service levels of the transport provider, presence of COVID restrictions etc. impact on the overall time from sample taken to results being provided back.

I also share the cover email below for the Version 2 of the engagement material, please note the deadline has been extended to 31 January 2021.

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://gbr01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fairspacechange.caa.co.uk%2FPublicProposalArea%3FpID%3D330&data=04%7C01%7C%7C2ba03574d00746b5d52908d8bf033450%7C7c20608d4a1b45e8b5533ef51e6a1960%7C0%7C0%7C637469367923700718%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6IjEhaWwlcXVCI6Mn0%3D%7C1000&sd=0PPPh0hRIh66QGfGHWtu2GxJygQFETmLJTVBIM4jl%2BiA%3D&reserved=0>

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

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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.

Kind regards,



skyports.net

-----Original Message-----

From: [REDACTED]
Sent: 22 January 2021 15:58

To: [REDACTED]

Cc: [REDACTED]

Subject: Objection to ACP-2020-099

Dear Sir or Madam,

I would like to object to ACP-2020-099.

I currently fly a homebuilt aircraft based at Strathaven Airfield near Glasgow. I have been flying light aircraft and microlights for over 30 years and nearly all of my almost 2700 hours have been flown VFR in Scotland. I visit Glenforsa Airfield regularly and Oban Airport occasionally. One of the great joys of flying a light aircraft in the West Highlands and Islands of Scotland is the lack of controlled or restricted airspace and so I was very concerned to hear of these proposals.

My first concern is about the process. The exceptionally short stakeholder engagement exercise period of only two weeks was unacceptable particularly since I understand that the applicant initially thought that Glenforsa Airfield was closed until July 15th and was not aware of a local Seaplane training operation. I understand that this period has recently been extended to three weeks but this is still much shorter than the normal 12 weeks. Justification for these short consultation periods is apparently claimed widespread stakeholder consultation by the applicant on similar proposals in the area last year eg. ACP-2020-038. However, I have yet to find a local pilot or flying organisation that knew about these previous proposals. In addition, the current ACP on the CAA site is very short on detail, with no information on proposed heights or timings. It took me a fair amount of research to find more information in the Targeted Engagement Exercise with Aviation Stakeholders document.

My second concern is about the timing. It is proposed that the trial starts on April 8- just about the time when the weather normally improves for flying light aircraft- and continues into May, when the best weather for flying VFR in the West of Scotland normally occurs. In any event, daylight hours are rapidly increasing at that time of year. Assuming that Covid-19 restrictions are relaxed by then, I think that there is likely to be much more light aircraft activity than normal this year because flying has been so restricted since last March.

Incidentally, if Covid-19 is less of a problem by the summer (hopefully because of the vaccines) much of the justification for the whole proposed operation will no longer apply! Indeed, there is a suspicion amongst the flying community that Covid-19 is being used as an excuse to test drones for essentially commercial purposes such as those highlighted on the applicant's own website under "Royal Mail and Skyports partner on drone delivery".

However, my main concern is that the proposed TDAs cover a large amount of airspace which extend unnecessarily high and also far too close to the often quite busy airfield at Glenforsa (which is due to reopen on April 1st). There is also little information on the times during which the TDAs will be activated, or how long they might be active each time.

At this point, I had originally intended to outline a number of measures that might mitigate the detrimental effects on General Aviation (GA), particularly near Glenforsa Airfield, similar to the ones already suggested by Nigel Hitchman. However, the more I have learned about these proposals and the process over the last few days, the more I feel that the applicant needs to scrap these proposals and think again.

I understand that the proposed drones have ADS-B in/out. I am an enthusiastic supporter of EC and have ADS-B, Pilot Aware and PowerFLARM all in/out fitted in my permit aircraft. However, the primary means of collision avoidance in VFR flying is still "see and avoid". Since it is almost impossible for pilots to spot a small drone visually before collision is imminent, I do not think it is feasible for drones and light aircraft to mix until a common form of EC has been proven to be a reliable in preventing collisions (which are almost always fatal to a light aircraft pilot and passengers) and is universally fitted (preferably with financial help). In the meantime, I do not think it is acceptable to exclude aircraft from large amounts of airspace to accommodate occasional drone flights. In short, the future is in integration not segregation.

Finally, I accept that moving medical samples etc quickly can be very important. However, I would like to see evidence of demand from the Medical Practices involved in this proposed trial. I would also like to know what other methods have been considered eg transferring urgent samples by fast boats or aircraft. After all Coll, Mull and Oban each have an aerodrome!

Yours faithfully,

████████████████████
████████████████████
████████████████████

Response 71: Individual AG

From: [REDACTED]
Sent: 24 January 2021 10:18
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Airspace change ID: ACP-2020-099 ACP-2020-048
Attachments: ACP-2020-099 Skyports - Oban-Mull-Coll - Targeted Av Stakeholder Eng Material v2.0.pdf

Dear [REDACTED]

I have received your email through Mr [REDACTED] email address. Thank you for taking the time to detail all your concerns regarding this ACP. I have attached the latest stakeholder engagement material for this ACP (ACP-2020-099), which was sent out Friday (including revisions based on current stakeholder feedback which aligns with yours) and now included you in our list of stakeholders and will ensure any future communications regarding this ACP are shared with you.

I hope this answers the majority of your concerns, if not please do get back to us. We fully agree in integration rather than segregation, and believe this to be the CAA medium/long term plan. Currently we have to operate within the rules which state, until UAS can comply with the requirements for flight in non-segregated airspace, BVLOS UAS flights outside permanently established segregated airspace may be accommodated through the establishment of segregated airspace on a temporary basis.

On the consignment of goods point we are in close liaison with the CAA in regard to our dangerous goods application, which will ensure any samples carried are in accordance with latest rules and regulations.

I also share the cover email below, please note the deadline has been extended to **31 January 2021**.

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) which 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 be deactivated.
- o We have also provided details of likely length of activations and tried to provide reassurance of deactivation of

TDA's 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 TDA's 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 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.

Kind regards,

[Redacted signature]

skyports.net



From: [REDACTED]
Sent: 23 January 2021 18:04
To: [REDACTED]
Subject: Airspace change ID: ACP-2020-099 ACP-2020-048

The following email was returned from your mail servers.
Sent from

[REDACTED]

Airspace change ID: ACP-2020-099 ACP-2020-048

Dear Sir, Madam,

Drones must have an autonomous collision avoidance system - and must always, by default, be liable in the event of a collision with a manned aircraft.

With the advent of drones for carrying commercial goods, it cannot be so that where they operate, automatically no other aviation may take place. The skies do not belong to Amazon or Royal Mail. The technology allows for automatic collision avoidance - technology will be able to pick up transponder signals, to then be able to automatically direct drones such that they avoid collisions with other aircraft. Bearing in mind technology is available and can do this – it must not be "the wrong way around" and we must never declare airspace sterile or forbid anyone to enter, calling it a danger area which locks any other use out except drones.

It would be tantamount to declare motorways only for use by HGV's, and instructing all other road using vehicles to not use a motorway.

The tail must not wag the dog.

I therefore object to the establishment of the temporary danger area above, in the vicinity of Oban on the following grounds.

1. "The CAA has a policy of keeping the volume of controlled airspace to the minimum necessary to meet the needs of UK airspace users and to comply with its international obligations." <https://www.caa.co.uk/Commercial-industry/Airspace/Airspace-change/Airspace-Change/>
2. Commercial operation of drones must be developed in a way that creates minimum disruption to other Airspace users.
3. If commercial drone operators habitually demand a TDA in the lower 1000 ft of airspace, then: -
 - a. a. The UK will become a mosaic of pop up danger areas which deny access to lower airspace and airports.

b. b. If this concept was extended across the UK, in certain areas, sections of aviation will be compressed into a horizontal space between 1000 ft and 1500 ft. If the CAA were to apply its Take 2 principal airspace users would be obliged to fly in a 100ft vertical section of airspace.

4. The application must be refused until such a time as the need for a TDA is clearly proven. The carriage of goods with biomedical properties over the sea does not constitute sufficient grounds for the establishment of a TDA. The same goods transported by lorry or ship do not impact the environment in which it is transported.

5. Carriers (such as Royal Mail) publish conditions under which consignments of goods may be transported to ensure that safety both inside and outside of their supply chain is assured. It is the carrier's responsibility, not the responsibility of other users of a national asset to provide that protection.

6. That the operator is conducting proving trials is not a compelling argument for the establishment of a TDA, The LAA, for example, performs its test flights on aircraft types without the need for a TDA

I have no objection to commercial drone flights where :-

1. The operator takes responsibility for keeping the environment in which they fly safe from the impact of their operation.

2. The operator mitigates the risk of the cargo they carry.

3. The drone operator is fully responsible for any damage they cause to people or their possessions, including private aviators flying their aircraft, and taking off and landing from GA aerodromes or their own private strips.

Within these criteria there is no need for a Temporary Danger Area.

Sincerely

[REDACTED]

Sent from [REDACTED]

Response 72: Individual AH

From: [REDACTED]
Sent: 28 January 2021 11:37
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: ACP-2020-099 UAS BVLOS in Segregated Airspace (Oban-Isle of Mull-Coll)

Hi [REDACTED]

Thanks for this information, I'll be sending out a reminded email later today which will also explain the 1500ft cloud base limit.

I have fed back the information on routing and communications to the Flight Ops Team and will incorporate the examination of AAIB reports into our internal processes. This is a great idea, thank you.

Many thanks and Kind regards,
[REDACTED]

From: [REDACTED]
Sent: 27 January 2021 15:30
To: [REDACTED]
Subject: Re: ACP-2020-099 UAS BVLOS in Segregated Airspace (Oban-Isle of Mull-Coll)

Hi [REDACTED]

Thanks for your email.

The short answer to your question is 'my opinion would be yes', because that proposal would further reduce the likelihood of collisions, particularly if aircraft are being forced to route away from, or fly below their planned course due to weather constraints.

The longer answer is that weather forecasting for Western Scotland is challenging, largely due to the terrain and the high latitude, which leaves the area prone to the effects of competing air masses (e.g polar and maritime etc) and consequent rapid changes in weather and wind. Added to this, any flights into the four aerodromes in the area that originate in England are likely to take two to four hours to complete. Potential rapid changes in weather are exacerbated by a limited number of diversion aerodromes and poor fuel availability (amongst the nearest fuel sources are Islay, Stornaway, Benbecula, Inverness, Prestwick, Perth and Cumbernauld). I have had to execute at least one unplanned climb into IMC up to MSA followed by an IFR let-down in the Firth of Lorne (BRUCE waypoint to Lismore Island) en route to Oban as a result of unforecasted low cloud in the area. Knowing that drones were operating beneath me would only add to the already high workload in such conditions.

You mention low level comms as an issue. In my experience, VHF communication with Scottish Information is often lost below 2,500' altitude to the north of Lochgilphead when routing from the south towards Oban. My aircraft's VHF radio can generally succeed in making contact with Oban Information once well into the Firth of Lorne and a little way into the Great Glen when departing towards Inverness. When arriving into the area from the West and North West (e.g. from Tiree, Stornaway or Plockton), I usually lose communication with Scottish when entering the Sound of Mull. I have found that Glenforsa Radio is only effective in the Sound of Mull in areas close to the Aerodrome at low altitudes. The high ground all around the aerodrome is probably the culprit.

As a final thought, I would recommend that your team examine the AAIB accident reports from incidents in this area to gain a further appreciation of the aviation challenges. Compared to my home base (Derby, England), there seem to be frequent events and a disappointing number of fatal accidents in this area. Recent incidents I am aware of that are salient to this discussion are G-CEOF (descent into the sea after departing Oban), G-BHXX (spiral dive into

mountains east of Oban) and D-EXKG (loss of control during the take off phase at Oban). The links to the AAIB reports are attached.

Thank you again for engaging in a constructive consultation.

Kind regards,

[REDACTED]

<https://www.gov.uk/aaib-reports/aaib-investigation-to-piper-pa-28r-201-chokeee-arrow-iii-g-ceof>

<https://www.gov.uk/aaib-reports/aaib-investigation-to-piper-pa-28-140-chokeee-g-bhxx>

<https://www.gov.uk/aaib-reports/aaib-investigation-to-extra-400-d-exkg>

Sent from my iPad

On 27 Jan 2021, at 07:52, [REDACTED] wrote:

Hi [REDACTED]

Thanks for this email and sharing your thoughts on this. We do agree and want to work with the GA and aviation community in general to share drone current capability and ideally work together to ensure technology and procedures develop in the correct way for all stakeholders.

Last year Skyports was onboarded into the CAA Regulatory Sandbox to explore with the regulator the viability of solutions for BVLOS operations of UAS in unsegregated airspace. The CAA is keen to accelerate its learnings and gain additional knowledge it can share with others. Nevertheless, the viability of solutions to operate UAS BVLOS in unsegregated airspace may still require airspace segregation in the first instance as part of an iterative trial plan; therefore, the allowance of unmanned aircraft systems to successfully and safely exist in airspace without the need for segregated airspace may still require some segregation in the first instance to support trials of solutions, and to help develop the appropriate regulatory frameworks and CAA approval mechanisms.

Really appreciate you going to the effort to share this revised routing. I have shared this with our flight operations team to reassess whether this could be possible and feasible. We did explore this in the beginning and from memory the initial concerns were drone range and LTE coverage in those locations, however they are reassessing this currently.

[REDACTED] you have great suggestions and we are trying to assess all possible solutions and I hope to share in the coming days that we will not operate when cloudbase <1500ft AMSL. This would have the combined effect of not hindering GA traffic in poor weather conditions and the low level comms issue. Would this be a reasonable solution in your opinion? The flight ops team are currently analysing this but I would love your thoughts on the matter?

Many thanks,

[REDACTED]

-----Original Message-----

From: [REDACTED]

Sent: 26 January 2021 18:42

To: [REDACTED]

Subject: Re[2]: ACP-2020-099 UAS BVLOS in Segregated Airspace (Oban-Isle of Mull-Coll)

Dear [REDACTED]

Thank you for your swift response to my concerns and also for engaging in a constructive fashion. Drones are going to continue to increase in number and a constructive consultation such as this could help define a set of parameters that would be of more general use. A number of pilots and colleagues in the aerospace industry are extremely concerned about the dangers of drones. The contrast between the relative level of imperilment between those in conventional aircraft and helicopters, (where a collision is extremely likely to be fatal for the passengers and crew) versus a drone, where perpetrators remain unscathed and may even be able to evade detection by the authorities (such as the Gatwick

event) creates a naturally hostile environment for those of us who 'have skin in the game'.

There are many issues to resolve, but the central problem in my opinion lies in keeping the drones and the conventional aircraft apart.

I have attached a chart of the area to illustrate the issues and to try and identify alternatives.

1. The red areas marked on the map are those where my GPS logs show that my aircraft was flying close to the minimum legal flying limit. This includes the take-off and landing phases of arrivals and departures at Glenforsa, Oban, Coll and Tiree. Transits between Glenforsa and Oban are generally carried out at lower altitudes through the sound of Mull and low level flying is sometimes necessary to due strong headwinds and wind-shear effects from the hills. Aircraft arriving at Glenforsa often transit at low level to Oban in order to refuel. Fuel has not been available at Oban in recent months, but I understand that infrastructure work is proceeding so that the service can be restarted in 2021.

2. I have rerouted your proposed drone tracks to avoid these low flying areas as much as possible. This involves routing the drones to the South side of Mull (which you have to do in any event to reach the Ross of Mull). Routing to Coll can then be achieved direct from Bunessan and Tobermory could be reached by entering the Sound of Mull from the north.

It is not possible for this routing to easily reach the Craignure destination, but those flights could be conducted as a direct shuttle service whilst in receipt of a service from Oban Information, (so that airspace users were aware of the drone traffic), or else conducted at night. Situational awareness is greatly enhanced by the use of ATC services and should an emergency situation develop with an aircraft, the drone operator will be aware of it and can take suitable evasive action.

Clearly, these revised tracks do not cover the needs of sea-plane operators, but I am sure that they are engaging with you separately.

3. In this revised routing option, I think there is a legitimate debate as to whether a TDA is even required. There is a long history of model aircraft operators co-existing with other airspace users and those protocols could also apply to drone traffic. I think it is worth exploring whether the revised drone zones are sufficiently far away from low flying traffic so that they could simply be NOTAMed when they are in use, much like those used to warn of free (weather) balloons, model aircraft event, gliding events and amateur rockets.

Thank you for your attention.

[REDACTED]

----- Original Message -----

From: [REDACTED]
To: [REDACTED]
Cc: [REDACTED]
Sent: 25/01/2021 18:01:21
Subject: RE: ACP-2020-099 UAS BVLOS in Segregated Airspace (Oban-Isle of Mull-Coll)

Dear [REDACTED]

Thank you very much for taking the time to send us your feedback, your suggestions are much appreciated and we have also noted your objection. I have attached the latest stakeholder engagement material for this ACP (ACP-2020-099), which was sent out last Friday (including revisions based on current stakeholder feedback which aligns with yours) and now included you in our list of stakeholders and will ensure any future communications regarding this ACP are shared with you. I hope this answers the majority of your concerns in particular your points 1-3 in the latter part of your email.

On your point 4 we also fully agree in integration rather than segregation, and believe this to be the CAA medium/long term plan. Currently we have to operate within the rules which state, until UAS can comply with the requirements for flight in non-segregated airspace, BVLOS UAS flights outside permanently established segregated airspace may be accommodated through the establishment of segregated airspace on a temporary basis.

I also share the cover email below from last Friday, please note the deadline has been extended to 31 January 2021.

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) which 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://gbr01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fairspacechanger.caa.co.uk%2FPublicProposalArea%3FpID%3D330&data=04%7C01%7C%7C7455e9a34798471d8a5908d8c22a2258%7C7c20608d4a1b45e8b553ef51e6a1960%7C0%7C0%7C637472833515731541%7CUnknown%7CTWFpbGZsb3d8eyJWljojMC4wLjAwMDAilCjoiV2luMzliLCJBTiI6k1haWwlcjVCI6Mn0%3D%7C1000&sd ata=UHni4hfQuwbsVC5Tt1JBqR%2B%2BGhbVia%2FwTxASTBjQ2M%3D&reserved=0>

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 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.

Kind regards,



-----Original Message-----

From: [REDACTED]

Sent: 25 January 2021 15:59

To: [REDACTED]

Subject: ACP-2020-099 UAS BVLOS in Segregated Airspace (Oban-Isle of Mull-Coll)

Dear Sir,

Further to your recent request to implement a TDA in the Oban/Mull area, I wish to express a number of concerns.

I am the operator and owner of a Cessna TR182 (G-BOPH) and I frequently fly to both Oban and Glenforsa aerodromes. I am also a retired Executive Director of [REDACTED] plc. My concerns reflect the view point of a private pilot and also the dangers of collisions between drones and commercial aircraft.

As a pilot, I have suffered one critical near miss with a large, illegally flown drone. It passed extremely close to my starboard wing. My co-pilot and passenger identified it as a large, four-engined white drone. This occurred while I was flying at 140 knots at 2,000' whilst receiving an ATC service from Bristol Radar in the Frome area of Southern England. A subsequent investigation by Bristol ATC was not able to identify the perpetrator.

I have some specific points related to safety which I believe should be factored into the consultation. I also wish to raise one commercial consideration.

1. The area in the Mull/Oban area is Class G airspace. There is a 2000' AAL ATZ protecting Oban airport and the area is served by Oban Information and Glenforsa Radio air traffic services. Collision avoidance within this airspace is achieved by the 'See and Avoid' methodology. Most aircraft also use additional electronic means

such as Mode-S transponders and other protocols such as ADSB OUT and FLARM to announce their position. These methods further aid collision avoidance. The use of additional devices is an industry trend. Electronic conspicuity is currently being promoted as a major initiative by the CAA, with rebates being offered against the purchase of approved equipment.

It is my view that if a drone is unable to comply with these rules and collision avoidance requirements, then it has no right to fly in that airspace. As a minimum, a drone should be able to operate as if it were a normal aircraft, that is to say that it is capable of seeing and avoiding other traffic and it should be carrying a mode-S transponder with extended squitter, supplemented by a ADSB OUT or FLARM device so that other aircraft can see it electronically. Those actions would maintain the risk profile extant in the area. I believe that Drones should be required to integrate safely with other traffic. The implementation of danger zones, restricting the usage by other airspace users as a result of the deficiencies of the safety features of the drone is not an acceptable alternative in my view. As one pilot said "Why should I give up my rights to fly in an area just because you can't comply with the rules of the air?"

2. The TDA areas as currently defined are very close to Oban and Glenforsa aerodromes. There are significant amounts of high ground around these aerodromes rising to 2000' in the immediate vicinity and up to 4413' nearby. As a result, aircraft are required to manoeuvre below MSA during the take off, approach and landing phases of flight at both these aerodromes. Many flights into both aerodromes are carried out by single pilot operators, a large proportion of whom may be low hours pilots. The workload to successful conduct a flight in this challenging terrain does not need further complications from errant drones, unable to comply with the rules of the air. In the event of engine failures or other problems, the Sound of Mull and the Firth of Lorne offer the only two areas where aircraft can safely manoeuvre at low levels due to the high ground. In such emergencies, aircraft may be forced to fly below the minimum legal height of 500'. The idea that drones will be operating at low levels around those aerodromes seems reckless in the extreme, given these issues.

3. Another concern relates to weather conditions in this area of the country. It can change rapidly and offer significant aviation challenges. On two recent occasions, I have run into unforecasted weather problems in the Oban/Mull area. In both cases, headwinds in excess of 40 knots were blowing through the Firth of Lorne and Loch Linnhe. To maintain progress I was forced to fly at low levels just above the legal low flying limit in order to reduce the headwind component in order to make sufficient progress. In one case, a fuel diversion to an alternate aerodrome was required. I believe that this is not an uncommon issue, especially as Oban airport is currently unable to supply Avgas and Jet-A1. General aviation aircraft are likely to be using the full legal airspace envelope. With drones potentially operating within 100' vertically, whose controllability would be questionable in rapidly changing weather conditions, the risk of collision is heightened.

4. Outside of safety concerns, I believe that there are commercial issues relating to Oban and Glenforsa aerodromes. It is widely understood that the introduction of airspace restrictions or controlled airspace discourages General Aviation flights. CAA Safety Sense Leaflet 5E states, "If your final intended track relies on weather or clearances, plan an alternate route, complete with timings and fuel." The practical upshot of this recommendation is that many General Aviation pilots avoid all

Controlled airspace and DAs whenever possible. A TDA in this area will undoubtedly have a negative impact on the leisure traffic arriving at both aerodromes. Glenforsa seems to be particularly adversely affected by the current proposals, as the proposed TDA tracks are extremely close to the aerodrome's visual circuit. But any TDA in the Oban/Mull area will have a detrimental effect on traffic in my view. Should the TDA go ahead, I believe that Skysports should be required to compensate the Operator of Glenforsa airfield and Argyll and Bute Council (the owners and operators of Oban aerodrome) for any losses they incur.

5. My final point is outside my direct experience, but I would be concerned to know what risk assessments have been carried out to protect people on the ground. Some of the routes proposed involve flights across long distances. Line of sight control will not be possible between a launching site at Oban and a landing site at Tobermory or any of the islands. The idea of a large drone operating inside a built up area where there are exposed pedestrians seems very alarming to me. If the drone is not able to integrate safely with existing air traffic (which appears to be the rationale for the TDA request), then how can it ever be safe to operate in the even closer confines of buildings and people?

Overall, I do not believe that it is acceptable for an operator such as yourselves to demand exclusive use of airspace simply because you wish to use unsafe drone technology that is unable to abide by the rules of the air. The creation of the TDAs as proposed is likely to cause significant amounts of detriment to other airspace users and financial damage to the fixed base operators at Oban and Glenforsa.

While this response is negative, I respect your rights to apply for the airspace restrictions and I note that you are approaching the request in a responsible fashion. In terms of securing the support of other airspace users, there are some actions you can take to diminish the safety risks. These could include but not be limited to:

1. To route your drones as far away as possible from operational aerodromes and the areas where take-off, low level manoeuvring and landing is required.
2. And in addition, you could reduce your maximum operating flight height to say, 300' AGL or less, well, clear of the 500' AGL low flying limit. You may wish to consider the use of the General Aviation Safety Council's 'Take 2' initiative. 200-300' AGL should be sufficient to clear buildings and structures, yet allow the drone remain well clear of other Class G traffic.
3. When drones are in use, operators should always remain in radio contact with the two local ATC providers and Scottish Information, ideally in receipt of a traffic service. This would aid situation awareness for all airspace users.
4. And finally, if drones are not being flown under VFR rules, then their flights could be scheduled for night-time hours, which would not conflict with other traffic. Neither Glenforsa or Oban currently operate IFR approaches. Night operations would also mean less pedestrian conflicts in the built up areas.

In summary, I believe drones should fly within the rules of the air as if they were normal aircraft. If this cannot be achieved, then should be kept as far away from other traffic as possible, both horizontally and vertically.

Yours faithfully,

████████████████████
████████████████████

Response 73: Individual AI

From: [REDACTED]
Sent: 25 January 2021 18:14
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Proposed airspace changes
Attachments: ACP-2020-099 Skyports - Oban-Mull-Coll - Targeted Av Stakeholder Eng Material v2.0.pdf

Dear [REDACTED]

Thank you for your response, your objection to this ACP has been noted. I have attached the latest stakeholder engagement material for this ACP (ACP-2020-099), which was sent out last Friday (including revisions based on current stakeholder feedback) and now included you in our list of stakeholders and will ensure any future communications regarding this ACP are shared with you.

I also share the cover email below from last Friday, please note the deadline has been extended to 31 January 2021.

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) which 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 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.

Kind regards,



skyports.net



From: [REDACTED]
Sent: 25 January 2021 17:09
To: [REDACTED]
Subject: Proposed airspace changes

To whom it may concern.

I send you this email today in regards to your companies proposed changes to the airspace around the Oban, Mull and Coll area.

I'm a stakeholder, in as much as I own my own GA aircraft and frequent that particular airspace quite often.

I would like to make it categorically clear that I disagree with your proposals and refute the statement that 'stakeholders have previously consulted' - I clearly haven't.

I vehemently oppose these proposed changes to current airspace.

I completely understand, as a drone user myself, that eventually we will have to accept mixed use of airspace.

I suggest you present more acceptable changes, in that you use an operating altitude much lower than that you currently propose.

I will be formally submitting my opposition to your proposals to the Civil Aviation Authority too. Please also notify the CAA, of my formal opposition to your plans.

Please do get in touch if you have any further questions.

Kind regards,
[REDACTED]

Response 74: Individual AJ

From: [REDACTED]
Sent: 01 February 2021 08:51
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: ACP2020-099 UAS BVLOS in Segregated Airspace (Oban-Isle of Mull-Coll)

Dear [REDACTED]

Thank you for taking the time to detail your feedback and share your thoughts, it is very much appreciated and your objection has been noted and will be shared with the CAA in our stakeholder summary report.

As mentioned before we also fully agree in integration rather than segregation, and believe this to be the CAA medium/long term plan. Currently we have to operate within the rules which state, until UAS can comply with the requirements for flight in non-segregated airspace, BVLOS UAS flights outside permanently established segregated airspace may be accommodated through the establishment of segregated airspace on a temporary basis. We are working with the CAA in their sandbox on a separate project to explore this however this ACP is in response to the current pandemic.

Many thanks again and kind regards,
[REDACTED]

From: [REDACTED]
Sent: 31 January 2021 21:58
To: [REDACTED]
Subject: ACP2020-099 UAS BVLOS in Segregated Airspace (Oban-Isle of Mull-Coll)

Dear [REDACTED]

Thank you for taking the time to respond to my email of 28 Jan. I acknowledge that various efforts have been made in response to comments made to date.

The heartbeat of my objection is threefold:

- The short period of time given to consultation
- The precedent set should this experiment be allowed to go ahead.
- The way in which GA is being boxed 'out' of the sky if it does not carry ADSB technologies

The pandemic is being used to justify rapid decision making. Longer debate would reveal that for UAV to fly 'alongside' GA, GA aircraft are going to have to carry technology that enables see and avoid from both UAV and pilot flown aircraft.

Refining the shape to minimise impact is a two edged sword. The creation of complex shaped TDAs makes avoidance challenging for GA and increases the chance of infringement.

Though you define relatively narrow/low corridors, these corridors act more as barriers where weather may act to limit the ceiling of GA aircraft. Thus in effect the activation of the corridors may close off the large parts of mull.

If this goes ahead, relatively few GA aircraft will be impacted given the remoteness of the area; my concern is that it will become the standard protocol by which all UAV operations are defined across the UK.

In the absence of addressing the technological issues, NOTAMed TDAs appear to be the only method of notifying GA pilots that the corridors are live. It is of course the responsibility of all pilots to be aware of relevant NOTAMs. The question is whether it is a realistic expectation that they will indeed have checked.

I wonder if uncertainty will simply mean fewer GA aircraft visiting the west coast. In effect the very existence of UAV will act to 'box out' GA aircraft in this part of the world, together with its consequential impact on economies associated with flying (most notably the Glenforsa Hotel!).

The immediacy & necessity associated with the pandemic means these arguments may have insufficient purpose. But the precedent will be set, and all for the wrong reasons.

The wider debate is what is needed. To ask how things could be, and to ask what technology/ policy is required to reach an amicable and workable solution.

I tried to leave comment at the CAA website, but from reading the website, I understand my concerns should be sent to you before the deadline of midnight tonight with a copy to [REDACTED]

Warm regards

[REDACTED]

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.net



From: [REDACTED]
Sent: 26 January 2021 16:39
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Drones over mull
Attachments: ACP-2020-099 Skyports - Oban-Mull-Coll - Targeted Av Stakeholder Eng Material v2.0.pdf

Dear [REDACTED]

Thank you for your email and sharing your thoughts on the ACP. I have attached the latest stakeholder engagement material for this ACP (ACP-2020-099), which was sent out last Friday (including revisions based on current stakeholder feedback) and now included you in our list of stakeholders and will ensure any future communications regarding this ACP are shared with you.

We also fully agree in integration rather than segregation, and believe this to be the CAA medium/long term plan. Currently we have to operate within the rules which state, until UAS can comply with the requirements for flight in non-segregated airspace, BVLOS UAS flights outside permanently established segregated airspace may be accommodated through the establishment of segregated airspace on a temporary basis.

I also share the cover email below from last Friday, please note the deadline has been extended to 31 January 2021.

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?plD=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 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.

Kind regards,

[Redacted signature]

skyports.net



From: [REDACTED]
Sent: 25 January 2021 21:34
To: [REDACTED]
Subject: Drones over mull

Dear [REDACTED]

Disheartening to read of your proposal. Have rehearsed the various arguments. The imperative of responding to pandemic bulldozes the opportunity for a shared solution. One in which a drone occupies a corridor finely demarcated in both time and space.

Instead we draw on blunt tools not fit for purpose of an era long past. Ones that create blanket exclusion of vast tracts of airspace for half days at best.

Your proposal and the thousands that will follow should be generating a new impetus for 'just in time, just in space' technologies and NOTAM notification that are nimble and efficient.

I feel rather exhausted by the lack of imagination. I am unimpressed by arguments driven by haste. I know that if you were a GA pilot you would not be penning this proposal but instead seeking an 'integrated' solution that enables co existence of UAV and human occupied machines.

Your vision is dystopic and ungainly. I do so hope it is re imagined as something kinder and more effective in accommodating current users of the skies.

Yours

Dr [REDACTED]

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The University of Edinburgh is a charitable body, registered in Scotland, with registration number SC005336.

Response 75: Individual AK

See also Appendix x: Scotia Seaplanes

From: [REDACTED]
Sent: 26 January 2021 16:49
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: ACP-2020-099 - UAS BVLOS in Segregated Airspace (Oban-Isle of Mull-Coll)
Attachments: ACP-2020-099 Skyports - Oban-Mull-Coll - Targeted Av Stakeholder Eng Material v2.0.pdf

Dear [REDACTED]

Thank you for your email and taking the time to explain your reasons, your objection has been noted and will be shared with the CAA in our engagement summary document post engagement.

To ensure you have the most up to date information I have attached the latest stakeholder engagement material for this ACP (ACP-2020-099), which was sent out last Friday (including revisions based on current stakeholder feedback) and now included you in our list of stakeholders and will ensure any future communications regarding this ACP are shared with you.

I also share the cover email below from last Friday, in case you have not got it.

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://gbr01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fairspacechange.caa.co.uk%2FPublicProposalArea%3FpID%3D330&data=04%7C01%7C%7C7d2b83ed704741aec3a808d8c21a4b3e%7C7c20608d4a1b45e8b5533ef51e6a1960%7C0%7C0%7C637472765483386379%7CUnknown%7CTWFpbGZsb3d8eyJWljoIMC4wLjAwMDAilCjQjoiV2luMzliLCJBTiI6k1haWwlcjV6Mn0%3D%7C1000&data=dchOct3oZrLr0lwguL2vhLXCu5eGwwviBCjg1kAoiBE%3D&reserved=0>

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.
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- o We have tried to provide better visibility of what TDAs will be activated together and which will as a consequence will be deactivated.
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- o We will explore with Oban Information and Scottish Information the provision of a DAAIS so that messages and requests submitted to the FISO can be relayed by phone to Skyports.
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- 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.

Kind regards,



skyports.net

-----Original Message-----

From: [REDACTED]
Sent: 25 January 2021 22:21
To: [REDACTED]
Cc: [REDACTED]
Subject: ACP-2020-099 - UAS BVLOS in Segregated Airspace (Oban-Isle of Mull-Coll)

Dear Sirs

I write in connection with the above ACP. I am a Flight Instructor & Examiner with Scotia Seaplanes of Prestwick, where I am the [REDACTED]. The locations of the proposed TDAs are interwoven with a key area of operation for my activity, and the nature of seaplane operation is such that training takes place in a band between surface and 600' above water level - the proposed TDAs therefore pass through the height bands where we spend most of our airborne time. Greater heights feature only in transits to/from water sites.

I object to the above ACP on the following grounds:

- (i) insufficient time has been allowed for a fulsome and proper consideration of the proposal. Extension to 31 January is of little help. The normally-mandated consultation period allows for a thorough and complete assessment of the potential impact on the operations in which I am engaged. 31 January does not, leading to a pressured and hurried analysis on my part;
- (ii) para. 6.1 (deconfliction) is vague, incomplete and wholly lacking in substance or detail. I am therefore unable to conduct any sort of definitive hazard identification and hence risk assessment of my operation against your proposal. I must therefore contemplate recommending to the business owner that we cease operation in the Mull/Oban area for the proposed duration of the Skyport trial;
- (iii) you make several references to ADS-B (in) capability but make no reference to the on-board processing of these data, with particular reference to sense-and-avoid capability. Further, liaison with ATC units at the heights at which we operate is usually impossible due to the nature of the terrain in relation to line-of-sight. Our primary means of deconfliction is see-and-avoid. Your proposal is therefore vague, sparse and weak in its treatment of deconfliction;
- (iv) Commercial impact on the owner's business, if I recommend cessation during the period of the trial, may be significant. It occurs right at the start of the season, with significant pent-up demand following 2020's lockdowns. Although based at Prestwick, Oban and its environs (Glenforsa in particular) is overwhelmingly the location of choice for our clients.

Yours sincerely,

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

FI (PPL/IMC/night/SEP(Land & Sea)/MEP(Land))

FE (PPL/IMC/SEP(Land & Sea))

[REDACTED]

Response 76: Individual AL

From: [REDACTED]
Sent: 29 January 2021 12:22
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: UAS BVLOS in Segregated Airspace (Oban-Isle of Mull-Coll)

Hi [REDACTED]

Thank you for taking the time to respond to us regarding this ACP. Your insight and points below are all noted and I do see where you are coming from.

We are following the CAP1616 process closely and are currently in the stakeholder consultation part of the process, we share the proposed designs and not the final designs. Reaching out informally prior to this process is something we are discussing internally and very happy to have an informal conversation on this with you. If you would like to have a call next week sometime do let me know? We are also in discussions with NATS regarding a DAAIS service for the GA community.

Kind regards,

[REDACTED]

From: [REDACTED]
Sent: 28 January 2021 19:46
To: [REDACTED]
Cc: [REDACTED] >
Subject: Re: UAS BVLOS in Segregated Airspace (Oban-Isle of Mull-Coll)

To whom it may concern

Personal flying experience: I am both a drone pilot and a PPL pilot who frequently flies from the east coast of Scotland out to Tiree and back for both business and leisure purposes. East/West routes across Scotland are almost always governed by the prevailing weather but most frequently involve transits of the Oban area to/from the N, NNE, NE, E, ESE, S, SW & W.

It cannot be stressed enough how important it is from a safety perspective to be able to fly at low levels over water when flying VFR in this area. Whether one is finding a safe place to descend through a gap in clouds having arrived in the area "VFR over the top" or needing to fly underneath very low cloud, local conditions in the Oban area are inevitably variable and when conditions deteriorate there is an increased focus on flying over water due to the surrounding high elevations as maintaining VFR is not only mandatory but essential for pilots to have the confidence of being able to fly safely. Limiting flight at lower levels over wide corridors of open water will limit the flight operations of others in more marginal conditions and furthermore any pilot who has flown in or out of Oban to/from the west will have experienced conditions dictate that one doesn't necessarily have a choice of routes between the Sound of Mull or round the south side of Mull.

Oban Airport is much more than just a destination airport, it is a critical alternate landing option for almost all flights on the west coast of Scotland in part due to the availability of fuel (present circumstances excepted), the fact that it is relatively sheltered, that its runway direction is differentiated from the traditional W/E and that it can be approached over the sea.

I now note, mid writing this, that you have made a further significant amendment to not be active if cloud base is at 1500 or less. This goes a long way to appeasing my safety fears.

As regards your general approach, I hope that you might admit that this has been a somewhat clumsy consultation, lacking in thoughtful preparation and situational awareness. I have sympathy with those who have been unnerved by the shortened consultation period and the heavy handed initial proposal which thankfully you are continuing to amend significantly. I sincerely hope that lessons have been learned and that a corporate's approach which lacks empathy for others is inappropriate and should not be tolerated by anyone.

Aviation is a very open industry, whether commercial or leisure, and safety is paramount for all of us. Not just being safe and abiding by the rules and regs, but feeling safe about both planning and executing flights. Airspace is for all of us and should be shared sensitively. I remain far from convinced that segregate airspace in wide, exclusive TDA corridors is the best answer. However, I accept that greater traffic management is potentially challenging given the communication challenges in this area whether one is communicating by telephone or VHF. Conspicuity is helpful, but expensive and not mandatory for all. Perhaps an approach similar to that of wind farms might be appropriate where a contribution to the wider community might be offered?

A particular question that I hope you are now actively asking yourselves is are you keeping any proposed airspace restrictions to the absolute minimum in terms both size and duration?

Yours faithfully

[REDACTED]

On 27 Jan 2021, at 09:20, [REDACTED] wrote:

Dear [REDACTED]

Thank you for this. You say that the original list of stakeholders is contained within the document, but from my reading it is not possible to identify per my request which stakeholders you originally identified (as distinct from those who have subsequently identified themselves to you) nor have you responded with regard to how this original list was compiled. I would be grateful if you might get back to me on these specific points.

Many thanks

[REDACTED]

On 27 Jan 2021, at 07:03, [REDACTED] wrote:

Dear [REDACTED]

Thank you for your email. I have attached the latest stakeholder engagement material for this ACP (ACP-2020-099), which was sent out last Friday (including revisions based on current stakeholder feedback) and now included you in our list of stakeholders and will ensure any future communications regarding this ACP are shared with you.

The list of original stakeholders is contained within the document and you can reply to this email directly to provide feedback.

I also share the cover email below, please note the deadline has been extended to **31 January 2021**.

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?plD=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 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.

Kind regards,



skyports.net

From: [REDACTED]
Sent: 26 January 2021 13:12
To: [REDACTED] >
Subject: UAS BVLOS in Segregated Airspace (Oban-Isle of Mull-Coll)

Please advise:

1. how I can register as a private individual stakeholder in the above consultation; and
2. how I can provide my feedback.

Additionally, please can you provide me with:

1. a list of the stakeholders you originally identified and contacted as part of the targeted stakeholder engagement exercise; and
2. an explanation of how this list was compiled.

Many thanks

[REDACTED]

[REDACTED]

<ACP-2020-099 Skyports - Oban-Mull-Coll - Targeted Av Stakeholder Eng Material v2.0.pdf>

Response 77: Individual AM

From: [REDACTED]
Sent: 27 January 2021 07:19
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: ACP-2020-099 Oban - Isle of Mull - Coll
Attachments: ACP-2020-099 Skypoints - Oban-Mull-Coll - Targeted Av Stakeholder Eng Material v2.0.pdf

Good morning [REDACTED]

Thank you for your email and providing these suggestions, they are very helpful. Most of your concerns and questions are addressed in the latest revision (attached), and this operation is due to conclude 30th April.

I have attached the latest stakeholder engagement material for this ACP (ACP-2020-099), which was sent out last Friday (including revisions based on current stakeholder feedback which aligns with yours) and now included you in our list of stakeholders and will ensure any future communications regarding this ACP are shared with you.

I also share the cover email below, please note the deadline has been extended to 31 January 2021.

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://gbr01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fairspacechange.caa.co.uk%2FPublicProposalArea%3FpID%3D3330&data=04%7C01%7C%7Cb624292d6bb748c5402108d8c293d015%7C7c20608d4a1b45e8b5533ef51e6a1960%7C0%7C0%7C637473287394362175%7CUnknown%7CTWFpbGZsb3d8eyJWljojMC4wLjAwMDAiLCJQIjoiV2luMzliLjBtIi6k1haWwlcjXVCI6Mn0%3D%7C1000&data=9bzfjhIIEKyilID0a8DowJBbboGuE5pZKb%2BoX4aQwGw%3D&reserved=0>

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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.

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- 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.

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- 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 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.

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- 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.

Kind regards,

[Redacted Signature]

skyports.net

-----Original Message-----

From: [REDACTED]
Sent: 26 January 2021 14:23
To: [REDACTED]
Subject: ACP-2020-099 Oban - Isle of Mull - Coll

Hello [REDACTED], I would like to ask some questions and make some comment regarding ACP-2020-099, which is being proposed by Skyports.

As a pilot I have used Glenforsa Airfield, which was constructed by the Royal Engineers in 1965 to support the local community, for over twenty five years. I am therefore particularly concerned by the proposed creation of a Temporary Danger Area in the Sound of Mull, between the 8th of April and 7th of May 2021.

1. On the notification document on the CAA website the chart showing the extent of the TDA shows a corridor, which in places occupies the full width of the Sound of Mull, approximately two kilometres. No information is given regarding the vertical extent of the airspace. Can you please advise what the proposed vertical limits are?
2. Glenforsa Airfield is located 2.2km to the east of Salen, where the Sound of Mull is approximately 3.5km wide. As depicted on the chart the track of the TDA is biased towards the southern side of the Sound of Mull.
3. For reasons of local topography, circuits to the runway at Glenforsa are conducted over the Sound of Mull, to the north of the runway. The downwind leg of the circuit would normally be flown at 1000ft AMSL.
4. Due to Covid-19 the Glenforsa Hotel was not open last year, but they are hoping to open on the 1st April this year. We often enjoy good flying conditions on the west coast of Scotland in April and May and to place restrictions on access to Glenforsa Airfield for a period of a month, would be unsatisfactory for both pilots and the business community on Mull.
5. Given the accuracy to which drones can be flown, can I please request that the width of the corridor be reduced to 1 km and that it's northern edge follow the line of the northern shore of the Sound of Mull.
6. Drones would have to operate above the height of yachts and ships that use the sound, but I would have thought an upper limit of 500 ft would be practical.
7. With the corridor located to the north and an upper vertical limit of 500 ft, it would be possible to access Glenforsa Airfield.
8. On occasion the weather can produce a low cloud base in the Sound of Mull, but with good visibility below it. Moving the corridor to the north and limiting it's vertical height, would still allow access to the airfield.
9. Can you please advise if the drones will be broadcasting ADS-B out?
10. I understand from your website that the flying time for the drone from Oban to Mull is around 15 minutes. I am therefore assuming that the TDA will not be active 24 hrs a day. Can you please advise how it is intended that activation of the TDA will be notified?

I have a booking for the Glenforsa Hotel during the first week of week of May, and am very much looking forward to using the airfield.

Regards,

[REDACTED]

Response 78: Individual AN

From: [REDACTED]
Sent: 28 January 2021 12:10
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: ACP-2020-099 UAS BVLOS in Segregated Airspace (Oban-Isle of Mull-Coll)
Attachments: ACP-2020-099 Skyports - Oban-Mull-Coll - Targeted Av Stakeholder Eng Material v2.0.pdf

Dear [REDACTED]

Thank you for taking the time to detail all your concerns regarding this ACP. I have attached the latest stakeholder engagement material for this ACP (ACP-2020-099), which was sent out last Friday (including revisions based on current stakeholder feedback which aligns with yours) and now included you in our list of stakeholders and will ensure any future communications regarding this ACP are shared with you.

I hope this answers the majority of your concerns, if not please do get back to us. We fully agree in integration rather than segregation, and believe this to be the CAA medium/long term plan. Currently we have to operate within the rules which state, until UAS can comply with the requirements for flight in non-segregated airspace, BVLOS UAS flights outside permanently established segregated airspace may be accommodated through the establishment of segregated airspace on a temporary basis.

I also share the cover email below, please note the deadline has been extended to 31 January 2021.

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) which 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.

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

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- 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).
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- o We will explore with Oban Information and Scottish Information the provision of a DAAIS so that messages and requests submitted to the FISO can be relayed by phone to Skyports.
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- o We have provided unmanned aircraft capabilities and limitations.

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- 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.

Kind regards,



skyports.net

-----Original Message-----

From: [REDACTED]

Sent: 28 January 2021 07:36

To: [REDACTED]

Cc: [REDACTED] >

Subject: ACP-2020-099 UAS BVLOS in Segregated Airspace (Oban-Isle of Mull-Coll)

Dear Sirs,

I have read your airspace proposal, I should say that first of all, that I am not against drone flying and commend your work to carry medicine to the Islands.

I've spent my life flying and sailing around Mull and my father even helped run the Glenforsa Hotel in the early days. I am however against the closure of Class G Airspace up the Sound of Mull and within the vicinity of the Glenforsa and the route to Oban.

May I ask why this proposal has not been sent to all the U.K. flying clubs and schools for comment, as we all use that area for safe transit when visiting the Islands?

I plan to operate 2 vintage World War 2 biplanes in the Spring from the Welsh Borders to Glenforsa. We are open aired, extremely weather dependent and can't necessarily fly very high due to weather conditions. Our flying is very much decided on the day. The Sound of Mull provides us with a safe route between the hills to Glenforsa. We certainly don't want to hit a drone in our aircraft, it could possibly kill us. We will be operating midweek and not just at weekends.

I'm also bringing up friends to fly and train with Scotia Seaplanes and this could potentially be adverse to their operation too. They are well known and appear in many adverts and television programmes promoting Scotland and flying from Glenforsa.

I would suggest the height of the drone should be limited to a lower level than that of aircraft, certainly away from what would be a normal ATZ for an airfield like Glenforsa and away from the safe route to/from Oban.

The NOTAMs, I suggest should be only for the time the drone is operating such as when the Red Arrows are flying. These can be clearly displayed on planning systems that we use such as SkyDemon. I also suggest that it carry transponders/ADS-B these would show where you are operating live on the likes of Flightradar24 and other ADS-B platforms. I also fail to see why it should need a 2km wide path up to 950ft which is where we will be flying.

Please could you lodge my objection to the current plan. Please work out away to keep our route between Oban and Glenforsa safe for us all to fly in, such as maybe keeping to night ops, flying the drone on the Northern shores of the Sound, except for the required crossing/ landing points and making sure we can see it with lighting and electronic systems. Please integrate rather than try to regulate the airspace.

Kind regards,

[REDACTED]

Sent from my iPad

Response 79: Individual AO

From: [REDACTED]
Sent: 28 January 2021 13:20
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Segregated Airspace Oban-Mull-Coll
Attachments: ACP-2020-099 Skyports - Oban-Mull-Coll - Targeted Av Stakeholder Eng Material v2.0.pdf

Dear [REDACTED]

Thank you for taking the time to detail all your concerns regarding this ACP. I have attached the latest stakeholder engagement material for this ACP (ACP-2020-099), which was sent out last Friday (including revisions based on current stakeholder feedback which aligns with yours) and now included you in our list of stakeholders and will ensure any future communications regarding this ACP are shared with you.

I am due to send out an additional reminder email today which will also detail how we will not operate our drone when cloud base is <1500ft.

I also share the cover email below, please note the deadline has been extended to 31 January 2021.

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.

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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.
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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.
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- o We can confirm that the unmanned aircraft is fitted with ADS-B IN and OUT.

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- 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.

Kind regards,



skyports.net

-----Original Message-----

From: [REDACTED]

Sent: 28 January 2021 09:20

To: [REDACTED]

Cc: [REDACTED]

Subject: Segregated Airspace Oban-Mull-Coll

Dear [REDACTED]

I'm very concerned to read your proposals about creating a TDA for drone use between Oban, Mull and Coll. As an international pilot, coming very often to this area, and very aware of the sometimes harsh weather conditions, it's my duty to provide my point of view!

This seems to be a one way request, as I'm not aware of any need to create a drone service. The Covid pandemic is used as a good reason to install the TDA.

I am also aware that drone transportation will be unavoidable in the near future, but this needs to be organized in a very different and much safer way.

To appropriate an important part of the airspace for private business use only, is far beyond the meaning of Airspace!

Here are some of my concerns:

- 1/ I do not hear from medical services on the isles that they ask for drone service.
- 2/ Drones will interfere severely all with other users of the airspace.
- 3/ Low flying is in many occasions mandatory, for safety of the pilots and passengers. 400ft AGL is still far too high in some occasions as VFR conditions are compulsory. Cloud bases can change quickly in those areas.
- 4/ Weather and elevation conditions will create dangerous conflicts with drones.
- 5/ Will the drones be equipped with a transponder, so that EVERY pilot can localize the drone inflight? Visual contact is not possible, due to the small dimension of a drone.
- 6/ Radio communication with Oban Radio and/or Scottish Information is very poor at low altitudes and behind the hill elevations.
- 7/ Will there be a 'warning' system that can communicate with ALL aircrafts in the vicinity of the drone?
- 8/ What about the conflicts with birds predating inflight on other birds, such as Eagles, Buzzards, Gulls, Skuas, Falcons, etc...? Accidents will happen.
- 9/ More and more we see low flying Delta Planes and Para Gliders who fly into those low altitudes.

I'm very afraid that installing a TDA within a narrow corridor used by GA pilots will cause accidents, which will have disastrous consequences.

Please, may I ask you to think twice, before casualties will occur?

Thank you for taking my concerns in consideration!

Best regards,

[REDACTED]
[REDACTED]
[REDACTED]

Belgium

Response 80: Individual AP

From: [REDACTED]
Sent: 28 January 2021 13:59
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: 'ACP2020-099 UAS BVLOS in Segregated Airspace (Oban-Isle of Mull-Coll)'
Attachments: ACP-2020-099 Skyports - Oban-Mull-Coll - Targeted Av Stakeholder Eng Material v2.0.pdf

Dear [REDACTED]

Thank you for taking the time to detail all your concerns regarding this ACP. Your objection has been noted. I have attached the latest stakeholder engagement material for this ACP (ACP-2020-099), which was sent out last Friday (including revisions based on current stakeholder feedback which aligns with yours) and now included you in our list of stakeholders and will ensure any future communications regarding this ACP are shared with you.

FYI I am due to send out an additional reminder email today which will also detail how we will not operate our drone when cloud base is <1500ft.

Details of the statement of need can be found on the CAA Airspace Change Portal which states, on your funding query, Skyports and its partners have been awarded funding via a joint COVID-19 response initiative between the UK Space Agency (UKSA) and European Space Agency (ESA) using space-enabled delivery drones to transport medical supplies and samples between a number of healthcare facilities. This information is also included in Section 1 of the attached document.

I also share the cover email below, please note the deadline has been extended to 31 January 2021.

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.

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- 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.

Kind regards,

[Redacted signature]

skyports.net



From: [REDACTED]
Sent: 28 January 2021 12:04
To: [REDACTED]
Subject: 'ACP2020-099 UAS BVLOS in Segregated Airspace (Oban-Isle of Mull-Coll)'

I write as a pilot in the West of Scotland, an experienced engineer and designer, in order to object to the proposed danger area, trial or otherwise, as above.

1. The information presented and the form of its presentation is unsuitable in aeronautical terms and insufficient in general in order to determine the case for such a TDA. `google earth is no substitute for an aeronautical chart in understanding airspace and terrain.
2. The authors of the proposal appear to have totally ignored the needs of local aviators and airfield facilities
3. The proposed manner of gaining access to the TDA is an unnecessary, impractical and potentially unsafe imposition on pilots who frequent this area
4. The area is one of natural beauty and a popular destination for pilots from far and wide whose enjoyment and safety are potentially impacted for no good reason
5. The proposed routings appear to have no justification or substantiation.
6. Why is a further trial being conducted here ? An earlier trial has flown the area and drone navigation is established. The COVID reason is being widely abused as an excuse for failures elsewhere and is a thin pretext for something else in my cynical view.
7. See and avoid is a principle in VFR flight and which should be adopted here - drone technologies are available with this capability and that would allow such an operation to integrate with other aviation operations.
8. General aviation aircraft are not required to carry ADSB-In equipment and neither do they have necessarily a radio so that avoidance cannot be based upon others mitigating the lack of facilities by the drone operation.
9. The need and or/use of an airfield / airport (Oban) appears to be unwarranted and to detract from the stated advantages of the drone operation
10. Providing a NOTAM 24 hours in advance further detracts from the supposed advantage of speed.
11. The justification of speed is unwarranted when the area is well served with ferries and road transport. A genuine medical emergency would presumably be evacuated by air ambulance anyway.
12. The area is subject to sudden and unpredictable changes in weather that may require pilots to make life saving decision to fly lower along the sound
13. The area is subject to poor radio coverage for GA pilots and as drones are at lower level presumably will experience worse coverage. Presumably such lack of coverage removes the possibility of drone operator being able to take either emergency or avoiding action should that be required. Likewise the facility to identify the drone location at point of loss.
14. The impact on possibly barely viable, economically, airfields such as Glenforsa is to be avoided in the interest of the Mull Residents as well as local and national pilots. The facility is used by the air ambulance when required and as such is an essential 24/7 facility.
15. The potential for loss of the drone payload in the Sound of Mull is not addressed and yet is stated as being "dangerous goods" No mention i made of compliance with any regulation covering the transport of such goods.

16. As a taxpayer I am shocked, if I understand correctly, that the NHS are in anyway financing such a trial with an unsubstantiated need when the service is supposedly short of finance for patient services. Having viewed a promotional video published by your organisation I further object that it contains incorrect and misleading information which should be removed and or corrected forthwith.
17. I note that the NHS are, in that video, supposedly financing the transport of PPE and Covid test kits by drone and that can hardly be classed as life saving. Instead it is more reasonably described as an expensive toy substituting for failures in logistics planning.
18. Regrettably I have to question the proposal competence in wider General Aviation matters and which, had it been at a higher level, may have led to a more acceptable proposal better suited and able to integrate with the general aviation community rather than impacting negatively upon safety, in the air and on the ground/water as this proposal does.
19. I trust that the CAA will take a dim view of such a proposal and the associated time waste for all concerned and from the far from complete list of stakeholders.
20. I would suggest that it be withdrawn without delay to be reconsidered in both detail as well as strategic importance.

████████████████████

Response 81: Individual AQ

From: [REDACTED]
Sent: 28 January 2021 15:58
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Objection to ACP-2020-099 and ACP-2020-048
Attachments: ACP-2020-099 Skyports - Oban-Mull-Coll - Targeted Av Stakeholder Eng Material v2.0.pdf

Dear [REDACTED]

Thank you for taking the time to detail all your concerns regarding this ACP. Your objection has been noted. I have attached version 2 of the stakeholder engagement material for this ACP (ACP-2020-099), which was sent out last Friday (including revisions based on current stakeholder feedback which aligns with yours) and now included you in our list of stakeholders and will ensure any future communications regarding this ACP are shared with you.

FYI I am due to send out an additional reminder email today which will also detail how we will not operate our drone when cloud base is <1500ft AMSL. A version 3 will be attached stating this.

I also share the cover email below (which answers the majority of your concerns), please note the deadline has been extended to 31 January 2021.

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) which 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 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.

Kind regards,

[Redacted signature]

skyports.net



From: [REDACTED]
Sent: 28 January 2021 15:43
To: [REDACTED]
Subject: Objection to ACP-2020-099 and ACP-2020-048

Hi [REDACTED]

I would like to Object to ACP-2020-099 and also ACP-2020-048 (of which the consultation period was very brief and therefore very few people were told about it and has not yet been approved).

I mainly fly light general aviation aircraft in from the South West of England, but have flown to the area on many occasions and will be visiting again post-COVID restrictions. I also am a regular visitor to Mull, having many friends and relatives who live there. Your consultation says you only contacted people within 10 miles of the activity, obviously the nature of aviation is that aircraft travel from all over the country, thus this is totally insufficient. The notification for this sort of restriction needs to be publicised to every pilot.

My main objection is that the proposals for TDAs to cover you commercial drone operation cover a large amount of airspace which extends unnecessarily high and also too close to an often quite busy airfield (Glenforsa) and there is no information on the times for which the TDA will be activated, or constraints on the length of time it might be active.

In order to prevent too much disruption, any activation of these TDAs needs to be NOTAMED at least 24 hours in advance and the NOTAM needs to include the exact timings, which should be for not longer than 30 minutes in each area and with at least a 30 minute gap between times of activation to allow time for GA traffic to pass the area, particularly anywhere near the airfield of Glenforsa. These timings must be included in the ACP.

The corridor seems to be very wide, given it's a small drone and presumably flown along accurate GPS routes, the corridors should be made narrower and particularly over the water to the east of Glenforsa, the drone route should be along the eastern shoreline as far away as possible from airfield circuit traffic and not above 400ft.

Many of the TDA areas have max heights above 400ft, this should be revised and all over water portions the max height should be 400ft and revised to be 400ft AGL max in the areas over land, preferably lower.

Glenforsa airfield should be considered as a "Protected Aerodrome" and thus have a 2.5nm radius zone upto 2000ft where no drones are permitted to fly without specific permission. This should be included in your ACP.

There has been mention of ADSB however most aircraft do not have this capability and it cannot be relied on. Drones need to have a system to visually "see and avoid" aircraft as they presumably have for avoiding overhead cables, masts and birds. If drone operators wish aircraft to have any sort of electronic device to enhance/enable drone operation, then this should be fully paid for by the drone operators.

Why not do your trials at night, then there would be no or very minimal disruption to other traffic. Waiting a few hours wouldn't unduly delay anything and anyway anything urgent could easily be sent by speedboat or by one of the many daily ferries that visit the islands?

It seems as though you have completely disrespected the General Aviation community that use the area intensely during the summer, and also as a means of travelling low level along the water when the cloud

base would prevent flight over the high ground in the area. These proposed danger areas would effectively make this impossible while activated. Personally I think this application should be thrown out until there has been a proper consultation of all affected parties, and I don't think it is safe to operate UAV's in this area until there is sufficient "see and avoid" technology that allows them to operate in the same sky as manned aircraft like we are doing with the implementation of ADS-B.

Kind Regards,

████████████████████

Response 82: Individual AS

From: [REDACTED]
Sent: 29 January 2021 11:24
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: ACP 2020-099 Oban-Isle of Mull-Coll ---- Objection----
Attachments: ACP-2020-099 Skyports - Oban-Mull-Coll - Targeted Av Stakeholder Eng Material v3.0.pdf

Dear [REDACTED]

Thank you for taking the time to detail all your concerns regarding this ACP. Your objection has been noted. I have attached version 3 of the stakeholder engagement material for this ACP (ACP-2020-099), which was sent out yesterday (including revisions based on current stakeholder feedback which aligns with yours), and now included you in our list of stakeholders and will ensure any future communications regarding this ACP are shared with you.

FYI Appendix C details principal issues and proposed solutions since this process began, it also detail how we will not operate our drone when cloud base is <1500ft AMSL.

Kind regards,

[REDACTED]

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This email is from Skyports Limited. Skyports Limited is a limited company registered in England and Wales with registered number 10755230. Our office is at Skyports, Unit LG.06, Edinburgh House, 170 Kennington Lane, London, SE11 5DP, United Kingdom. Our registered office is at Kingfisher House, Radford Way, Billericay, Essex, United Kingdom, CM12 0EQ. This message is intended solely for the addressee and is private and confidential. If you have received this message in error, please send it back to us, and immediately and permanently delete it. Do not use, copy or disclose the information contained in this message or in any attachment. Please note that neither Skyports Limited nor the sender accepts any responsibility for viruses and it is your responsibility to scan or otherwise check this email and any attachments.

From: [REDACTED]
Sent: 28 January 2021 17:53
To: [REDACTED]
Subject: FW: ACP 2020-099 Oban-Isle of Mull-Coll ---- Objection----

From: [REDACTED]
Sent: 28 January 2021 17:52
To: [REDACTED] >
Subject: FW: ACP 2020-099 Oban-Isle of Mull-Coll ---- Objection----

Dear Sirs

I OBJECT TO THE PROPOSALS EXPRESSED IN ACP-2020-099

I would like to add my name to the list of objectors regarding the Airspace changes numbered above, and below.

There is little I can add to the detail already well expressed below. My objection is simply to the principle that large swathes of airspace available to and used by, GA, can simply be closed for long periods without consultation. The overriding impression is that government pet projects such as this are given immediate priority because they are somehow important and the rest of GA is not.

It would have been very simple to find somewhere else, over water, or within an existing military zone or danger area. It could also be done at night, as the correspondent below has suggested. Added to which, if the stated intent is eventually to integrate with GA, then an existing zone would be a great way to test out their systems.

[REDACTED]
PPL A [REDACTED]

Response 83: Individual AT

From: [REDACTED]
Sent: 29 January 2021 11:53
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: ACP-2020-099 Skyports Oban-Mull-Coll
Attachments: ACP-2020-099 Skyports - Oban-Mull-Coll - Targeted Av Stakeholder Eng Material v3.0.pdf

Dear [REDACTED]

Thank you sincerely for taking the time to detail your concerns and your objection is noted. I have attached version 3 of the stakeholder engagement material for this ACP (ACP-2020-099), which was sent out yesterday (including revisions based on current stakeholder feedback which aligns with yours), and now included you in our list of stakeholders and will ensure any future communications regarding this ACP are shared with you.

FYI Appendix C details principal issues and proposed solutions since this process began, it also detail how we will not operate our drone when cloud base is <1500ft AMSL.

In addition and in attempt to answer your other points not covered in Appendix C:

- we are in talks with NATS in providing a DAAIS service for the GA community.
- We are following the CAP1616 process closely and are currently in the stakeholder consultation part of the process, we share the proposed designs not the final designs. Reaching out informally prior to this process is something we are discussing internally and very happy to have an informal conversation on this with you to share your experiences. If you would like to have a call next week sometime do let me know?
- Glenforsa – At the time of our initial route analysis it was stated this airfield would be closed until 15th July, however we are now in touch with the person who runs this airfield and understand this information was from 2020 and requires updating.

Below in brief are 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.
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- o We have removed the Oban-Easdale route which has a TDA Upper Limit that was a little high.
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- 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 requests submitted to the FISO can be relayed by phone to Skyports.
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5. Procedures to cooperate with air traffic services:

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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.

Thank you sincerely for all the information you have provided and hopefully we can have a call next week.

Kind regards,

[Redacted signature]

skyports.net



This email is from Skyports Limited. Skyports Limited is a limited company registered in England and Wales with registered number 10755230. Our office is at Skyports, Unit LG.06, Edinburgh House, 170 Kennington Lane, London, SE11 5DP, United Kingdom. Our registered office is at Kingfisher House, Radford Way, Billericay, Essex, United Kingdom, CM12 0EQ. This message is intended solely for the addressee and is private and confidential. If you have received this message in error, please send it back to us, and immediately and permanently delete it. Do not use, copy or disclose the information contained in this message or in any attachment. Please note that neither Skyports Limited nor the sender accepts any responsibility for viruses and it is your responsibility to scan or otherwise check this email and any attachments.

From: [Redacted]

Sent: 28 January 2021 18:00

To: [Redacted]

Subject: ACP-2020-099 Skyports Oban-Mull-Coll

In connection with the above TDA ACP I hereby register my objection.

The proposed TDA is a severe infringement, and potential risk to safety, upon local and national GA activities in this area which is a favourite destination, weather permitting, for pilots from all over Scotland, from further afield in the UK and on occasions Europe as well.

The stated need of COVID response is a weak and unnecessary, frequently it seems misused, justification for the planned activities which as described and covered in your responses to others can not be met through the issuance of a NOTAM 24 hours in advance.

At the same time providing a phone number to request access would appear to be an unnecessary and risky confusion to the process. It is typical to request a crossing service when accessing a danger area and to do so most often and conveniently by radio in a timely fashion. In this way the information and the permission is as up to date as it can be and thus safety is not impacted more than necessary.

However this particular area is hardly in need of such complication and potential risk to the volumes of traffic that visit the scottish islands as well as the other volumes of traffic transiting along the coast, including military, and often forced away from land by airspace operators restrictions elsewhere.

Radio reception and transmission in this area is poor to say the least and no doubt it is similar for radar and thus no doubt also drone communications and control. Many aircraft do not carry ADSB yet and it is unreasonable to expect that they do or will. Likewise some aircraft still fly "non radio" as they are permitted to do.

Having been involved as an engineer in many varied major infrastructure designs, including stakeholder consultation exercises as both initiator and responder, over the years, it's my experience that a lot is gained from involving stakeholders, and their experience, in the process - before - any substantive designs are submitted to a wider review. This is regrettably not the case here and consultation seems to have gone to an attempted final design whilst being restricted in time and to a very limited number of organisations omitting for instance local commercial operators who would be easily identifiable. The motivation behind such action is of course unknown but does not foster trust.

The time allowed, initially at two weeks, is totally inadequate to allow flying clubs over a wide area within Scotland and other organisations, some of which are currently closed, to gather members views and enable coordinated, reasoned and collected thoughts to be submitted. I am gathering from the changes and responses to questions, already being posed by others, that a lot of information required by interested parties was omitted from the initial document.

As an example of the above, the apparent after thought of avoiding Glenforsa at certain times and narrowing the airspace locally it would appear that insufficient knowledge of the locality and its users was gained in advance.

Whilst it may seem to be appropriate to respond dynamically, it is confusing and wasting of further time for all concerned, including the CAA as the authority having jurisdiction (AHJ) in this matter, during the consultation to move the goal posts during the consultation process. I refer to the changes to routing and altitude. As an engineer it would appear to indicate a preliminary design, unsuitable for formal consultation, rather than a "final" design.

By presenting a (preliminary) design for consultation in this way, rather than holding informal consultations as part of developing preliminary design through to final, Skyports seem to be misusing the process and effectively employing, unremunerated, the stakeholders to do the design work on their behalf.

In my professional field such an approach would cause my customers, including stakeholder regulators with whom I deal on their behalf, to question my competence, technically and process wise. Such an activity deserves not to be rushed and neither should it be used to place commercial interest above those of safety.

The amount of airspace being claimed is far in excess of that which is reasonable. My friendly drone operator advises that his drones fly to within a couple of metres accuracy in both altitude and horizontally and so why is the airspace volume so large ?

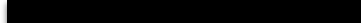
Further why is it over water and thus the route chosen by a lot of pilots for sightseeing and access to Glenforsa or Oban as well as the white eagles nesting on the hills surrounding the sound. The routes given are indirect and thus increasing the risk unnecessarily, through distance travelled, in comparison to taking a direct route.

Similarly the altitudes, which apparently Skyports are able to change at will, cast doubt on the unsubstantiated reasoning behind their choice in the first instance, do not appear to follow any logic or indeed identifiable need. Skyports should be aware, but apparently were not, that for a GA pilot 0 - 400 ft AGL is a typically a no go area other than for landing and is perhaps why it seems to have been set aside for drone operations. However that is not necessarily the case in the event of the need to save life after perhaps encountering severe weather forcing a pilot to low level. In that case a wise pilot may well decide that over water is a safer option.

Other pilots have shared youtube videos of autonomous drones and that are apparently able to fly accurately enough, presumably +/- 1m, in order to snare a catcher for recovery purposes. Others are fully autonomous with see and avoid technology - optical, lidar and radar - so why is that not on trial, elsewhere, to prove that drone technology can match the typical GA pilot in avoidance capability and in order to integrate rather than segregate operations.

I have no doubt that the GA community in general will be dismayed by the manner and the content of this TDA proposal.

I suggest that Skyports seriously reconsider this proposal and perhaps return with a completed "final" design taking into account all valid reasonable comments and underpin the exercise with suitable and sufficient substantiation that removes doubt in the safety and sensibility of the revised proposal for all stakeholders.


FAA and CAA Licensed Pilot
Chartered Engineer
Resident in Scotland

Response 84: Individual AU

See also Scottish Aeromodellers Association

From: [REDACTED]
Sent: 29 January 2021 13:37
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Oban operation - SAA

Hi [REDACTED]

Thank you for all this. I have reached out to the SAA last night on [REDACTED], as another stakeholder recommended this to me also. If they need more time to digest this please tell them to let me know and we can accommodate this.

Kind regards,
[REDACTED]

From: [REDACTED]
Sent: 29 January 2021 13:21
To: [REDACTED]
Cc: [REDACTED] >
Subject: RE: Oban operation - SAA

Hi [REDACTED]

Thanks for sending this through, very useful information. I have looked through your list of sponsors which has a great variety, one thing I noticed that there is no mention of any model flying associations, the Scottish Aeromodellers Association (SAA) being the main one in Scotland although there are many members in Scotland in the British Model flyers Association (BMFA) being consulted.

I have been part of the SAA for over 20 Years, along with my father [REDACTED] of the SAA, One of the members had contacted him regarding this as he thought it was going to stop him flying, I did explain to my father that it would more than likely be TDAs and that they would not be active all the time which Alastair confirmed today. I will relay this information back and if there are any concerns raised I will get back to you to let you know.

I will try and find out if the SAA have any established clubs around the areas you will be operating, just in case, many model flyers that have flown in particular areas for years would not think to check NOTAMs ect!

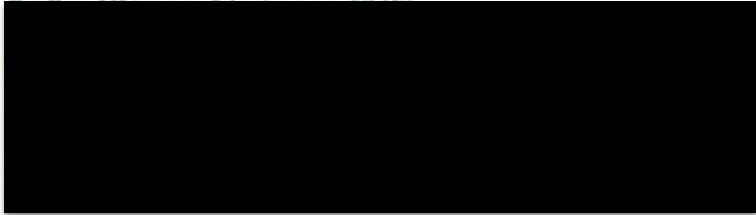
Regards

[REDACTED]

[REDACTED]

[REDACTED]





- Land & Build Surveying
- Setting Out Engineers
- Land Registry Services
- Laser Scanning Services
- Hydrographic Surveying
- Volumetric Surveying
- Dimensional Control
- AutoCAD Draughting Services

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From: [REDACTED]
Sent: 29 January 2021 12:47
To: [REDACTED]
Cc: [REDACTED] >
Subject: RE: Oban operation - SAA

Hi [REDACTED]

Thanks for this introduction [REDACTED] I have attached version 3 of the stakeholder engagement material for this ACP (ACP-2020-099), which was sent out yesterday (including revisions based on current stakeholder feedback), and now included you in our list of stakeholders and will ensure any future communications regarding this ACP are shared with you.

FYI Appendix C details principal issues and proposed solutions since this process began, it also detail how we will not operate our drone when cloud base is <1500ft AMSL.

The deadline for comments is **midnight this Sunday 31 January 2021**. 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.

Kind regards,

[REDACTED]
[REDACTED]

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From: [REDACTED]

Sent: 29 January 2021 09:11

To: [REDACTED]

Subject: Oban operation - SAA

Morning [REDACTED]

Great to catchup earlier.

As discussed, if you have any more enquiries regarding our upcoming operations in the Oban area feel free to email myself or [REDACTED] who works on our Regulatory team.

All the best,

[REDACTED]

[REDACTED]

[REDACTED]

[Connect via LinkedIn](#)
skyports.net



Response 85: Individual AV

From: [REDACTED]
Sent: 29 January 2021 17:39
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: ACP2020-099 UAS BVLOS in Segregated Airspace (Oban-Isle of Mull-Coll)
Attachments: ACP-2020-099 Skyports - Oban-Mull-Coll - Targeted Av Stakeholder Eng Material v3.0.pdf

Good evening [REDACTED]

Thank you for all your feedback and detailed information of flying activities in the areas. I have attached version 3 of the stakeholder engagement material for this ACP (ACP-2020-099), which was sent out yesterday (including revisions based on current stakeholder feedback) and now included you in our list of stakeholders and will ensure any future communications regarding this ACP are shared with you.

FYI Appendix C details principal issues and proposed solutions since this process began, it also details how we will not operate our drone when cloud base is <1500ft AMSL. Hopefully this will answer the majority of your concerns, however I have detailed the highlights below. Your suggestion of text messaging has also been noted, thank you.

Below in brief are 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 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.

Kind regards,

[Redacted signature]

skyports.net



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From: [Redacted]

Sent: 29 January 2021 12:23

To: [Redacted]

Subject: ACP2020-099 UAS BVLOS in Segregated Airspace (Oban-Isle of Mull-Coll)

Dear Sirs,

I write to you, to submit my thoughts and concerns about ACP-2020-099.

Name : [Redacted]

Organisation name : self interest.

Position in the organisation : Pilot

Email : [REDACTED]

I am a microlight (flex wing) pilot and owner [REDACTED] I am based at Strathaven airfield in South Lanarkshire. I fly year round. Last year (during covid times) I flew over 200 hours. A large proportion of these hours are flown in the west of Scotland and Islands. My aircraft's endurance is almost 8 hours. I fly at speeds between 45mph and 70mph. I often fly for over 5 hours, with no contact with ATC, flying below radio coverage.

I object to this proposal in its current (revised) state.

I fly at the heights proposed by this ACP. Let me repeat. I fly at these heights. I am not a pilot who stays 2000 feet AMSL/AGL. I am a pilot who flies, at times, offshore at and below 500ft. I fly in and through every part of the proposed TDA's.

I do not fly point to point. I fly by the whim, flying where I want, changing my mind and direction, as I want. Terrain, weather, wildlife and photographic opportunities are other factors that dictate where my 'hang-glider with an engine' flies.

Flying lower, provides shelter from more turbulent air that can be caused by the local terrain. Flying low near or over water, I see where the turbulent air is, by its interaction with the water. This allows me to adjust my track to avoid this turbulent air, on a tactical basis.

Each differing wind direction, creates differing wind effects and turbulence areas. For example, the Tobermory-Craignure TDA. Northerly winds would mean I fly close to the (northern) shoreline of Mull (southern side of the Sound of Mull). A southerly wind direction will have me flying along the northern side of the Sound of Mull. Having airspace, which might be the smoothest air, removed from me, becomes at best uncomfortable, at worse, DANGEROUS!

Why are the TDA's so wide? I can pass C130's or fighter jets flying along the Sound of Mull, whilst I am at 250ft, and photograph them!. How can a TDA be justified for such a small drone which I assume can fly with better precision than I ever could. I note the revised ACP, where a section has reduced this TDA to a track, rather than block of airspace. I believe it all should be like this. I see the argument against making all the TDA's tracks, and the claim that the drone would have to ditch seems bizarre and alarmist. Can the drone not come to a halt before reversing course back to base? If not, then is the concern that the drone would then be flying off track? If so I am sure this is minimal (if its ever needed). I note that for a proportion of the remaining design, a direct track back to base (depending where initiated) would take the drone out-with the TDA and possibly over land not part of the TDA. Isn't that essentially the same argument against the track portion?

If you have doubts of the heights and routes I fly, have a look at my facebook page for posts in 2020 and 2019 (<https://www.facebook.com/profile.php?id=100010687201740>). Here I put up a small snapshot of my flights. Have a look at the post from the 20th June 2020 to see where low cloud lasted longer than forecast that day, and I needed to remain low under the hill tops offshore. Or the 24th of July, where many of the images might have been impossible if this ACP had been in place and likewise for the 14th August.

Will the TDA always become active with 24 hours notice? If notified active, how much certainty is there that the airspace will be actually used for the day of activation? Might a situation occur where I depart at 6am, thinking the airspace is active, when in reality at there was never a chance of it being used?

Could a TDA become notified as active, after I have departed Strathaven at 6am, (previously not notified) and if so how am I to learn this if I am not in contact with any ATC unit?

Would the sponsor consider receiving and sending of text messages rather than just phone calls, on the day, to ascertain the activity times. I cannot make phone calls whilst flying and I am sure the you would not appreciate phone calls at 6am prior to my departure. I can often pick up text messages as I fly past villages.

Since 2014, my simple flexwing microlight has been fitted with ADSB in and out. I also have Pilotaware, further increasing the number of aircraft I am warned about, and seen by. I appreciate that Skyports are trying to follow CAA guidance and regulations, but shouldn't the trial be about going to the next stage and trying to integrate with other airspace users? Might a suitably equipped aircraft, who can see the drone and thereby mitigate any risk of collision, be allowed to enter the TDA's?

On reflection, my objection is very me me me centred, granted, but that's because this effects me.

Last year, I was 'put out' by your previous TDA routing to the corner of Mull. I was flying in that area on two occasions when the TDA was showing as "possibly active". I decided on one of those days to fly inland between some of the hills of Mull instead of following the coast. On that day I did encounter turbulence. Not severe, but enough for me to remember. Did you fly that day? Did you fly when I was in the area? Was my venture into more turbulent air needed? Will it be needed the next time?

I have no objection to these drone flights, per-say. I also appreciate, I could, in probably in 99% of occasions route or climb to avoid the probable empty piece of airspace. I object to the TDA's and the size of them.

I will happily share class G airspace, as I already do, with every other pilot, aircraft or drone.

Thank you for your time.

████████████████████

Response 86: Individual AW

From: [REDACTED]
Sent: 29 January 2021 18:21
To: [REDACTED]
Cc: [REDACTED]
Subject: Re: Objection

Hi [REDACTED]

I am real don't worry, i just wanted to make sure you have all the latest information.

Enjoy the weekend,

[REDACTED]

Get [Outlook for iOS](#)

From: [REDACTED]
Sent: Friday, January 29, 2021 5:49 pm
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Objection

Hi [REDACTED]

Before I respond with some thoughts, I just wanted to see if I am talking to a human or an email autoresponder :)

No offence intended if you are not an autoresponder! :)

Thanks very much
[REDACTED]

On 29 January 2021 17:42:54 GMT, [REDACTED] wrote:

>Dear [REDACTED]
>
>Thank you for email, your objection has been noted. I have attached
>version 3 of the stakeholder engagement material for this ACP
>(ACP-2020-099), which was sent out yesterday (including revisions
>based on current stakeholder feedback) and now included you in our list
>of stakeholders and will ensure any future communications regarding
>this ACP are shared with you.
>
>FYI Appendix C details principal issues and proposed solutions since
>this process began, it also details how we will not operate our drone
>when cloud base is <1500ft AMSL.
>
>Below in brief are 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 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.

>

>

>Kind regards,

>

>

>

>skyports.net

>

>

>

>

>

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>company registered in England and Wales with registered number
>10755230. Our office is at Skyparts, Unit LG.06, Edinburgh House, 170
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>

>-----Original Message-----

>From:

>

>Sent: 29 January 2021 17:36

>

>To:

>

>Subject: Objection

>

>Dear Skyparts

>

>As a licensed and active pilot in the UK I object to your current
>airspace / Danger area requests that would severely limit flying in a
>significant area as well as stop operations at at least 1 active
>airfield.

>

>Please confirm receipt.

>

>Thankyou

>

--

Sent from my Android device. Please excuse my brevity.

Response 87: Individual AX

From: [REDACTED]
Sent: 29 January 2021 14:30
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: ACP-2020-099 - UAS BVLOS in Segregated Airspace (Oban-Isle of Mull-Coll)

Hi [REDACTED]

Thank you for your response. Your objection has been noted.

Kind regards,
[REDACTED]

From: [REDACTED]
Sent: 29 January 2021 12:03
To: [REDACTED]
Cc: [REDACTED]
Subject: ACP-2020-099 - UAS BVLOS in Segregated Airspace (Oban-Isle of Mull-Coll)

Dear Sirs,

Please find attached my response to the consultation regarding the above subject matter.

Regards
[REDACTED]

Appendix B: Response Form

Name	[REDACTED]
Organisation Name	Private Aircraft Owner
Position in the Organisation	Not Applicable
Email	[REDACTED]

Feedback

While I accept that Drone operation has a future in the aviation world I think it is essential that the key for operation is the integration of BVLOS Drones into the airspace. The proposals and those like it seek to further segregate the air and make it more difficult to operate rather than easier.

It does not appear that SkySports has fully justified the need for a trial in this area.

At present there is a proliferation of these sorts of trials in operation and the country risks being bisected by Restricted Areas that are difficult to keep track of. It is clear that these trials are being driven by organisations to gain commercial advantage.

At the moment it appears that competing drone operations are running out of remote islands to justify their trial to show how deliveries could be expedited. If the goal of these trials is to assess how BVLOS Drones can operate and identify the risks and challenges, then it would seem beneficial for the industry to co-operate in one or two trials. This would be more cost effective and less disruptive. There does not appear to be any clear benefit to a trial here than in say the Isle of Wight or the corridor now in place between Cornwall and the Isles of Scilly.

Using COVID appears to be used as a mechanism to sidestep the full consultation process. On 16th December, the stated aim of Sky Sports was to run a purely commercial service <https://www.bbc.co.uk/news/uk-scotland-glasgow-west-55332660>.

There does not appear to be a clear justification for NHS use that would support the trial or a waiver of the minimum consultation time.

- Transporting PPE would be best done by truck where greater amounts can be shipped at one time.
- The document acknowledges the risk of transporting items by BVLOS Drones over water so it would seem that the proposal to transport COVID test swabs is an unnecessary risk where results are key.
- The short duration of the trial does not appear to give any beneficial use to the NHS.
- While the limited operation (no weekends, no Bank Holidays) is welcome, the decision does not support the justification that the trial is to help with the COVID-19 response, since testing and vaccination is a 7-day week operation.
- It is unclear what this trial adds that cannot be sourced from other trials being carried out within the UK.

Duration of restricted airspace.

- There are often significant issues in RT communication with Scottish Information when at low level in the area of the trial so updates on whether drones are airborne or whether restrictions have been withdrawn may be difficult. This is likely to result in longer periods of restricted airspace than actually required if notification is made 24 hours earlier.

- The medical facilities on the islands are open at very restricted times but these times are known. Can the timing of the restricted airspace be set ahead of a trial to match the opening times? This would seem logical since the current proposal; 24 hours notice, no night, no weekends, no Bank Holiday operations suggests that out of hours support is not being considered.

Welcome the amendment around Glenforsa but question the width of the restricted airspace in other areas.

- The drones are relatively small so even allowing for manoeuvring and buffer space the width of the corridors seem wide – by comparison, I can fly a 360 VFR turn in my light aircraft well within the width of the proposed corridors.

Response 88: Individual AY

From: [REDACTED]
Sent: 31 January 2021 07:49
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: ACP-2020-099 UAS BVLOS in Segregated Airspace (Oban-Isle of Mull-Coll)
Attachments: ACP-2020-099 Skyports - Oban-Mull-Coll - Targeted Av Stakeholder Eng Material v3.0.pdf

Dear [REDACTED]

Thank you for taking the time to detail all your concerns regarding this ACP, your objection has been noted. I have attached version 3 of the stakeholder engagement material for this ACP (ACP-2020-099), which was sent out last Friday (including revisions based on current stakeholder feedback which aligns with yours in appendix C) and now included you in our list of stakeholders and will ensure any future communications regarding this ACP are shared with you.

Kind regards,

[REDACTED]
[REDACTED]
skyports.net

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-----Original Message-----

From: [REDACTED]
Sent: 29 January 2021 18:25
To: [REDACTED]
Cc: [REDACTED]
Subject: Fwd: ACP-2020-099 UAS BVLOS in Segregated Airspace (Oban-Isle of Mull-Coll)

Sent from my iPad

Begin forwarded message:

>
> Regarding the above ACP I write to you to firmly object and oppose this proposal.
>
> As a GA pilot operating a microlight aircraft out of Northumberland I am lucky to be able to fly in many areas of beauty and interest in the north of England and Scotland. One of my favourite and regular areas to visit is the west

coast of Scotland and in particular the lovely airfield of Glenforsa on the Isle of Mull which offers accommodation and the opportunity to fly around many of the west coast islands.

>

> I was therefore dismayed to hear of the above proposal which would limit access to Glenforsa airfield circuit and present a hazard to aircraft taking off or landing at the airfield by the creation of TDA's around the Isle of Mull and Coll. Effectively rendering Glenforsa closed and the area around it unwelcome to GA aircraft. On investigating the proposed changes to airspace I was then greatly dismayed and annoyed by the way this proposal has been managed by Skyports Ltd. While we all appreciate the pressure COVID is placing on everyone and society in general and the inevitability of the increased use of USV's it is clear that this proposal is using the current situation to "short circuit" due process and "railroad" these proposals through.

>

> I am disgusted by the claims that consultation has been offered to all stakeholders by Skyports Ltd. Constructing a list then failing to directly contact people, businesses and organisations is not consultation. Offering two weeks notice to respond, short circuiting a 12 week process and posting a proposal on the CAA web site is not consultation. Also referring to a previous consultation which was also not communicated to all involved parties is not consultation.

>

> It is very clear from the reaction of GA pilots , businesses and GA organisations that this proposal has been poorly conceived with little or no thought given to other airspace users or flying related activities in the area. It has been poorly communicated in what appears to be an attempt to bypass normal process. If this is the way that Skyports Ltd intends to develop its business it does not bode well for a more balanced and equitable shared approach to the management of airspace and the development of UAV use.

>

> [REDACTED]

>

> Sent from my iPad

Response 89: Individual AZ

From: [REDACTED]
Sent: 31 January 2021 12:56
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Objection Drone Zone

Dear [REDACTED]

Thank you for your response, we confirm receipt and your objection has been noted.

Kind regards,
[REDACTED]

From: [REDACTED]
Sent: 30 January 2021 18:53
To: [REDACTED]
Subject: Objection Drone Zone

Sirs.

Objection to proposed drone zone Scotland.

Kindly acknowledge receipt.

Regards
[REDACTED]

30th January 2021

Dear Sirs

It has sadly come to my attention (by chance) that a London-based sponsor is intending to demarcate for exclusive drone usage, an area over the tourist-rich, magnificent countryside around Iona, Crinan, Mull and Oban. This decision would appear to be based on surreptitiously and inadequately-conducted 2020 drone trials, without consultation to potentially affected parties or industry experts.

As an interested party having spent the summers of the past eight years sea-plane flying in this area of outstanding natural beauty, I would be loath to return from my native South Africa to fly again should this project go ahead in its current form. The benefits of drone-flying are well-documented but given the very real safety implications for general aviation the least one would have expected would be a full and unbiased investigation into the merits and de-merits of the proposal. Affected and interested parties and experts in the field should have been consulted and safety measures should be guaranteed. Such consultations, at best, would yield an integrative solution to the benefit of all parties involved. A one-sided report conducted in the unrealistic landscape of Covid 19 lockdown (complete with its empty skies) is an inadequate and dangerous measure on which to base the granting of this directive, despite the sponsor's appeal to the contrary.

To allow this application to go ahead without proper consultation and process would be a tragedy in the making hugely impacting tourism and the safety aspects of general aviation and I appeal for sanity to prevail and a more integrative and positive solution to be sought in the best interests of all.

Yours faithfully

████████████████████

Response 90: Individual BA

From: [REDACTED]
Sent: 31 January 2021 13:30
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Objection to ACP-2020-099
Attachments: ACP-2020-099 Skyports - Oban-Mull-Coll - Targeted Av Stakeholder Eng Material v3.0.pdf

Dear [REDACTED]

Thank you for your email, your objection has been noted. I have attached the latest version of the stakeholder engagement material and now added you to our list of stakeholders. Appendix C states the principle issues and proposed solutions to date (based on feedback from stakeholders).

In response to your points below:

- We are in contact with Scottish Air Ambulance & Police Scotland and have agreed a Temporary Operating Instruction with them whereby they can access to an active TDA.
- We are in discussions with NATS regarding a DAAIS service for GA.
- Any dangerous goods carried (blood samples) will be in accordance with the CAA rules and regulations on Dangerous Goods and this will need to be approved by them first.
- We also fully agree in integration rather than segregation, and believe this to be the CAA medium/long term plan. Currently we have to operate within the rules which state, until UAS can comply with the requirements for flight in non-segregated airspace, BVLOS UAS flights outside permanently established segregated airspace may be accommodated through the establishment of segregated airspace on a temporary basis. We are working with the CAA in their sandbox on a separate project to explore this however this ACP is in response to the current pandemic.

Thank you again for all your suggestions, they will be feed back to our team and the CAA in our stakeholder summary report.

Kind regards,

[REDACTED]

From: [REDACTED]
Sent: 30 January 2021 22:09
To: [REDACTED]
Cc: [REDACTED]
Subject: Fwd: Objection to ACP-2020-099

I am a retired surgeon and operator of vintage aircraft.

I wish to object to your proposal on three grounds

1The principle of acute medical care in remote areas of Scotland is, in cases of severe illness, urgent transfer to a centre of expertise with minimal delay with or without prior stabilisation by a dedicated transfer team. In the case of Mull and Iona this is usually from Glenforsa airfield. This is an area of uncertain VHF communication due to the topography. In the event of failure to contact you to cease drone activity, or your inability to contact the drone, there could be a delay in evacuation and a poor patient outcome. Unfettered access in class G airspace is necessary

for the air ambulance and also for air-sea rescue, mountain rescue and coastguard helicopters. A cost benefit analysis of your drone proposal requires to be carried out as movement of samples against optimum medical care of the very ill seems a poor balance.

2Your proposal suggests the carriage of dangerous materials. This cannot be acceptable in a trial. Your COSHH risk assessment must conclude that the carriage and potential loss or liberation of dangerous or bio-hazardous material over land or in the sea and safe recovery is an unacceptable and unmitigatable risk.

3Many vintage aircraft have no electrical system and thus cannot support electronic conspicuity. Separation in class G airspace is see and avoid. Carriage of VFR radio is not mandated in class G. I suggest you await the development of drone ability to see and avoid before utilisation on class G airspace. Trials can be carried out in existing danger areas rather than in a popular area of aerial tourism with no low level radar cover and uncertain VHF communication.

████████████████████

Response 91: Individual BB

From: [REDACTED]
Sent: 31 January 2021 13:56
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Objection to Drones - Scotland
Attachments: ACP-2020-099 Skyports - Oban-Mull-Coll - Targeted Av Stakeholder Eng Material v3.0.pdf

Dear [REDACTED]

Thank you for your response and detailing your concerns, your objection has been noted. I have attached the latest version of the stakeholder engagement material and now added you to our list of stakeholders. FYI Appendix C states the principle issues and proposed solutions to date (based on feedback from stakeholders).

Kind regards,

[REDACTED]
[REDACTED]

skyports.net



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From: [REDACTED]
Sent: 31 January 2021 11:13
To: [REDACTED]
Subject: Objection to Drones - Scotland

Objection of Drone usage in Scotland

29 January 2021

By shear chance I noticed on social media that areas of Scotland, in particular Oban, Iona, Mull and Crinan will be demarcated for drone use exclusively.

I have been travelling to these parts of Scotland for the past 6 years to fly floatplanes, some of the most enjoyable flying I've done.

We have encouraged other flying friends to join us, and are looking forward to this summer, assuming our plans are not thwarted by COVID restrictions.

I cannot for one moment fathom why restrictions would be placed on General Aviation aircraft to have the freedom to fly in one of the most beautiful parts of the world.

In addition it would seem that the normal process of public dialog and consultation has not taken place.

I encourage the decision makers to pay attention to this and any other objections, you will be destroying a part of the tourism industry in Scotland.

Yours Faithfully

[REDACTED]

Response 92: Individual BC

From: [REDACTED]
Sent: 04 February 2021 09:50
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: ACP- 2020-099 UAS BVLOS in Segregated Airspace (Oban-Isle of Mull-Coll)

Hi [REDACTED]

Hopefully this answers the additional question.

- The width of the unconstrained TDA currently accounts for turn radius, or orbit capability (the larger of the two) together with a buffer. We are currently analysing if this can be reduced further.
- On the constrained leg I have provided some technical detail:
The VTOL (Vertical Take-off & Landing) capability is reserved to only support take-off and landing, not to support manoeuvres during flight. It runs on a separate battery system than the battery system uses for forward flight in fixed-wing mode for safety reasons and has been designed to support normal take-offs, aborted take-offs and any other scenario that would require it to hover for a certain amount of time in order to land safely again (e.g. an emergency landing). The system is not designed by the manufacturer for use during forward flight apart from facilitating an emergency landing.

The constrained leg design functionality was designed by the manufacturer to enable the drone to fly below 400ft through mountainous regions. This functionality enables us to plot a route that stays well clear from other aircraft without running the risk of an orbit or RTH being triggered and the drone hitting a mountain ridge as it is making a turn. Working with the OEM, we've worked out a means of introducing a constrained leg, which is actually safer even if it does limit our options, for the following reasons:

- When using a constrained leg, we cannot execute an orbit in the event of the ADS-B picking up the presence of another aircraft should one enter segregated airspace.
- By operating within a constrained leg we take up as little space as possible. The SUA has a small corridor that it will navigate through but will automatically trigger an emergency land if it determines that it has breached that corridor.

Hopefully this explains why the whole route cannot be a constrained leg.

Many thanks for all your feedback.

Kind regards,

[REDACTED]

From: [REDACTED]
Sent: 02 February 2021 10:59
To: [REDACTED]
Cc: [REDACTED]
Subject: Re: ACP- 2020-099 UAS BVLOS in Segregated Airspace (Oban-Isle of Mull-Coll)

[REDACTED]

Thanks for your email which sounds encouraging. However you have not answered my point regarding why, given the capabilities of the onboard nav systems, are you still requesting such a huge block of airspace? It seems unnecessary, and it is the size of the TRA which has the biggest impact on other airspace users.

I accept that on the long over water legs you have to fly high enough to avoid the boats and ferries, but I would have expected the UAS to be easily capable of following a course along the coastline - and to make the open sea crossings between two (well publicised) land features. In this way the UAS operations would be similar to a line of HT Power cables (which are marked on the charts and which aircraft are used to avoiding) - and would cause virtually zero disruption to flying activities.

Best Regards

[Redacted signature]

On 1 Feb 2021, at 08:42, [Redacted] wrote:

Hi [Redacted]

Thanks for taking the time to provide this feedback, it is very much appreciated. Your objection has been noted. I have added you to our list of stakeholders and will ensure any future communication regarding this ACP are shared with you.

We also fully agree in integration rather than segregation, and believe this to be the CAA medium/long term plan. Currently we have to operate within the rules which state, until UAS can comply with the requirements for flight in non-segregated airspace, BVLOS UAS flights outside permanently established segregated airspace may be accommodated through the establishment of segregated airspace on a temporary basis. We are working with the CAA in their sandbox on a separate project to explore this however this ACP is in response to the current pandemic.

We are also working with NATS to provide a DAAIS and hope to have some news soon on this.

Kind regards,
[Redacted]

From: [Redacted]
Sent: 31 January 2021 19:59
To: [Redacted]
Cc: [Redacted]
Subject: ACP- 2020-099 UAS BVLOS in Segregated Airspace (Oban-Isle of Mull-Coll)

Emails should be sent to [Redacted] Please title the email 'ACP- 2020-099 UAS BVLOS in Segregated Airspace (Oban-Isle of Mull-Coll)'.

Appendix B: Response form

Name:	[Redacted]
Organisation name	None (although employed as a flight instructor, I am responding as a private pilot and aircraft owner)
Position in the organisation	N/A
Email Feedback	Email Feedback

I OBJECT TO THE PROPOSED AIRSPACE CHANGES

I am an experienced Private Pilot, Aircraft owner and Flight Instructor who regularly flies from my base near London directly to the airfields, of Oban, Glenforsa,, Coll, Plocton and Barra.
My objection is based on the following:

1. The proposer has not taken sufficient steps to engage and consult with the wider group of airspace users that would be impacted by the proposed changes nor allowed enough time for impacted parties to assess and analyse the proposals and submit proper comment.
2. The proposer has been deceitful in claiming that this trial is a direct response to a request from the NHS, whereas it is common knowledge that the end game is obtaining approval for a potentially very lucrative commercial parcel delivery service.
3. The proposer has been deceitful in claiming that they had consulted with all potentially impacted airspace users when clearly this is not the case. The proposer failed to contact the operator or users of Glenforsa airfield – whilst initially proposing TDA that would sit on top of Glenforsa and therefore making Glenforsa totally inoperable when the TDA was in force. The proposer also failed to consult with Highland Seaplanes.
4. The proposer has made no attempt whatsoever to publicise their intentions or to consult with the wider General Aviation group who frequently fly in the affected areas. They should perhaps have placed advertisements in the major GA publications, magazines – and online aviation forums. Their failure to do so, indicates either a significant lack of knowledge, or a poorly conceived attempt to avoid consulting the group of airspace users that might be most likely to object to the proposal.
5. The proposer has provided no details to show why the restricted airspace needs to be so high – or so wide.
6. The proposer has failed to take full (or even reasonable) advantage of the capabilities of SUA's in order to minimise the size of TRA requested – or the impact on GA airspace users.
 - a. Even a £200 off the shelf "Toy" drone is capable of being very easily programmed to autonomously fly a complex route BVLOS to an accuracy of better than 1 metre and an altitude accuracy of approximately 3 metres.
 - b. Why then are the proposers requesting corridors that are approximately 2nm wide and from the surface to (upto) 750ft amsl? (The specified SUA has VTOL capability and therefore does not need a large area to execute a 180 degree turn)
 - c. Why could the proposer not use the highly accurate autonomous navigation capabilities of the SUA and select routes that follow within (say) 50m of the coastline, and upto (say) 200ft amsl – rather than creating a 750 ft high x 2nm wide "No Go" corridor right down the middle of a busy aviation thoroughfare? Routing around the coastline at low level would have minimal impact on other airspace users.

In closing,I would add that I do not object to the use of SUA's. I like them, I enjoy playing with them, and I fully recognise that they WILL form an integral part of the aviation infrastructure. My objection is based purely on the displacement of General Aviation that will occur should this proposal be accepted in its present form. If the proposal were to be amended in a way that minimises the disruption and displacement of GA, then I would willingly support it. Segregation cannot work in the medium - longer term as there simply is not enough airspace - and everyone wanted to be in the same place. Therefore we should be aiming to achieve integration of SUA/UAV's with existing airspace users.

Lastly, if the proposal is approved, it is essential that a DAAIS facility is provided that will allow pilots to (a) get real time updates on the TDA status, and (b) obtain information / a clearance to cross areas of the TRA that are inactive at that particular time.

Best Regards

████████████████████
████████████████████

Response 93: Individual BD

From: [REDACTED]
Sent: 07 February 2021 17:38
To: [REDACTED]
Cc: [REDACTED]
Subject: Re: ACP- 2020-099 UAS BVLOS in Segregated Airspace (Oban-Isle of Mull-Coll)

Dear [REDACTED]

Thank you for your prompt & comprehensive reply to my stakeholder response to Skyports ACP-2020-099.

Your explanation of why it's impractical to operate your SUA on constrained legs was particularly useful and largely explains why BVLOS ops need a larger amount of airspace than a simple linear route. It's also very reassuring to know of Skyports awareness, engagement & contingencies regarding military low flying aircraft.

However, I do feel that several of the concerns I raised have not been fully addressed. Specifically:

1. What are Skyports intentions regarding operations on the West coast of Scotland once the current Covid support / proof-of-concept trials covered by the existing ACPs are complete?
2. Does Skyports have any alternative proposals on how it will operate BVLOS in unsegregated airspace, should suitable DAA technology fail to materialise?
3. Will Skyports make available *all* the responses to your ACPs from other stakeholders & does Skyports have any plans to hold (virtual) meetings with stakeholders as part of the consultation process (in line with recommendations in CAP 1616)?

Thanks again for your consideration & I look forward to hearing from you.

Kind regards,

[REDACTED]

On Mon, 1 Feb 2021 at 12:19, [REDACTED] wrote:

Dear [REDACTED]

Thank you for your feedback, genuinely appreciate the time you have taken to put this all together and there is some great feedback here. Your objection is also noted. I have added you to our list of stakeholders and included a copy of the latest stakeholder engagement material and will ensure any future communication regarding this ACP are shared with you. I have attempted to answer your queries below as best as possible:

- Unfortunately based on LTE/GPS capability, sea salt spray and climb performance we are unable to operate at 150ft AGL.
- Thank you for the detail on military aircraft activity, we are in touch with the MOD (DAATM) and they will advise of any planned exercises including that within FJASOUTH (Ex Joint Warrior) which is currently not planned in this location this year. If MOD advise us our active TDA has an impact on their operations, we will simply not operate for the duration.

- This airspace change is purely in relation to the current pandemic and will cease 30th April 2021. Any future airspace changes will need to go through a new Airspace Change Process.
- Your comments on DAA are noted and whilst I cannot speculate into what may happen I can say that we also fully agree in integration rather than segregation, and believe this to be the CAA medium/long term plan. Currently we have to operate within the rules which state, until UAS can comply with the requirements for flight in non-segregated airspace, BVLOS UAS flights outside permanently established segregated airspace may be accommodated through the establishment of segregated airspace on a temporary basis. We are working with the CAA in their sandbox on a separate project to explore this however this ACP is in response to the current pandemic.
- The width of the unconstrained TDA currently accounts for turn radius, or orbit capability (the larger of the two) together with a buffer. We are currently analysing if this can be reduced further.
- On the constrained leg I have provided some technical detail:

The VTOL (Vertical Take-off & Landing) capability is reserved to only support take-off and landing, not to support manoeuvres during flight. It runs on a separate battery system than the battery system uses for forward flight in fixed-wing mode for safety reasons and has been designed to support normal take-offs, aborted take-offs and any other scenario that would require it to hover for a certain amount of time in order to land safely again (e.g. an emergency landing). The system is not designed by the manufacturer for use during forward flight apart from facilitating an emergency landing.

The constrained leg design functionality was designed by the manufacturer to enable the drone to fly below 400ft through mountainous regions. This functionality enables us to plot a route that stays well clear from other aircraft without running the risk of an orbit or RTH being triggered and the drone hitting a mountain ridge as it is making a turn. Working with the OEM, we've worked out a means of introducing a constrained leg, which is actually safer even if it does limit our options, for the following reasons:

- When using a constrained leg, we cannot execute an orbit in the event of the ADS-B picking up the presence of another aircraft should one enter segregated airspace.
- By operating within a constrained leg we take up as little space as possible. The SUA has a small corridor that it will navigate through but will automatically trigger an emergency land if it determines that it has breached that corridor.

Hopefully this explains why the whole route cannot be a constrained leg.

- Dangerous goods – we are going through the approval process with the CAA and complying with any regulations required for the transportation of blood. We will not fly dangerous goods without the CAAs approval.
- Thank you for suggestion ACP-2020-100, we will look into this and adapt our internal processes accordingly.

Many thanks again for taking the time to detail all your concerns, your feedback has been really helpful.

Kind regards,

[Redacted signature]

From: [Redacted]
Sent: 31 January 2021 23:52

**- Response to Skyports ACP-2020-099 UAS BVLOS in Segregated Airspace
(Oban-Isle of Mull-Coll)**

Background and stakeholder credentials

I am a former military fast jet pilot who was based in Scotland for 10 years; I then worked in flight testing for an aircraft manufacturer before becoming a commercial pilot and joining the Scottish regional airline Loganair, as a Captain on their Western Isles routes; I now fly for a UK medium-haul airline to European destinations from a base in Scotland; I am a GA pilot and user of the airspace on the West coast of Scotland, including the airfields at Mull Glenforsa, Oban, Tiree and Islay

I believe 30 years of experience flying in Scotland for these diverse and often conflicting airspace users gives me the background knowledge to speak on the subject with some credibility.

I also believe drones are an essential part of our future in aviation and we should find ways to embrace the benefits of such technology, including the services you propose to bring to isolated, rural communities. However, based on your ACP and statements linked to this project made by Skyports in the open media, I have four areas of concern, with associated questions:

1. Airspace and the proposed implementation of TDAs

Existing airspace and users - this ACP in its current form proposes the creation of 11 TDAs of varying height and width, which in total cover a large volume of airspace. This is Class G airspace – by very definition, open FIR – and in the crowded UK airspace structure, there is very little of it left. I fully understand the rationale behind the need to deconflict SUAs and manned traffic, and that current Detect and Avoid (DAA) technology cannot yet provide robust and reliable deconfliction to allow SUAs to operate safely in unsegregated airspace. Hence the need for TDAs to provide segregation. However, if we accept that such widespread creation of TDAs closes large blocks of Class G airspace for the exclusive use of a single commercial operator, it seems patently unjust to deny access to existing users and expect them to modify their activities to suit the newcomer. Surely it should be the other way round?

Lateral and vertical operating limits - having read the ACP in detail (and being cognisant of the implications of SUA performance and the limitations of operating on "constrained legs"), I still fail to understand your need for such a large volume of airspace requiring its own TDA, when other similar aerial activities conducted by larger, manned aircraft, eg. pipeline inspection flights, aerial surveys, are able to use linear routes activated by NOTAM. Whilst also acknowledging your max operating altitude is 400ft agl and few other airspace users operate this low, those who do will be significantly disadvantaged by the loss of this height band. Are Skyports able to operate at or below 150ft agl/amsl, ie. below the vast majority of existing airspace users (except perhaps occasional helimed ops who should have ADS-B deconfliction capability anyway)?

Military flying - the ACP correctly identifies the MoD as an existing airspace user and stakeholder. Despite the welcome reduction in military low flying, it remains a core skill which is still regularly practised, particularly in the more "remote" regions of open FIR as covered by this ACP. As you will know, the altitude limit for military low flying in the UK during peacetime is 250ft agl/amsl (Minimum Separation Distance (MSD) in military terminology). With proposed operations of your SUA up to 400ft agl/amsl, I would suggest a collision with a military user of the airspace is possibly the biggest threat to your operation and any collision between an SUA and a fast jet flying at 540kts would be catastrophic. From direct experience, I can attest that the Sound of Mull is a major low level transit route and in times of bad weather (with cloudbases as low as 500ft), it is often the *only* safe option through the surrounding terrain – this a tactical decision which frequently has to be made on the spot, not 24 hours in advance. Establishing a TDA here in such a "choke point" not only complicates the already onerous planning requirements to conduct military low flying safely but it also removes *completely* the option of a safe route at low level in bad weather. Can Skyports confirm what the MoD response to your ACP has been?

You will also probably be aware of Exercise Joint Warrior which takes place twice a year and involves large scale participation of ships, fixed wing aircraft and helicopters from the RAF, RN as well as the UK's NATO partners. These exercises are conducted throughout the West Coast of Scotland and frequently along the Sound of Mull, often involving a significant increase in air traffic and low altitude helicopter operations from naval vessels, with airspace closures via associated NOTAMs. Can Skyports confirm what its contingency plans are for SUA operations during periods of Ex Joint Warrior?

Future airspace use – Skyports' stated intent is to evolve this proof-of-concept into a permanent, commercial operation which ultimately uses DAA technology to move towards SUA operations in unsegregated airspace, ie. without the need for segregation or TDAs. Will Skyports provide written assurance that if this is successful, their intention is to hand back the previously established TDAs so that all airspace users can return to safely enjoying unrestricted Class G airspace?

2. DAA technology

I note from a presentation given by Duncan Walker, Skyports CEO to Eurocontrol on 11 Nov 2020 "Drone deliveries; UTM, DAA and how to move from segregated to unsegregated airspace" (link: <https://www.eurocontrol.int/sites/default/files/2020-11/european-network-ospace-demonstrators-presentation-duncan-walker-skyports.pdf>) that the company's aim is to transition to SUA ops in unsegregated airspace by "2021 onwards" via the widespread use of DAA technology. Presumably at this point the TDAs will no longer be required and can be dis-established. This is a commendable aspiration but the timeline appears highly unrealistic. It hinges on technology which has not yet been widely implemented and in some cases, has not even been developed.

DAA technology and users - most military aircraft are not equipped with ADS-B (understandably, for Emcon reasons) and there is currently no Collision Warning System (CWS) in existence which works against high speed, dynamically manoeuvring military fast jets, nor is there likely to be in the near future. This means a complete lack of collision protection against virtually all military aircraft, particularly the fast jets which operate in the low level altitude regime. In the interests of transparency, can Skyports provide the MoD's response to the risk posed by this ACP and Skyport's apparent reliance on as-yet undeveloped DAA technology?

SUA limitations - Skyports state that the SUA it plans to use is unable to execute a "return-to-home" manoeuvre whilst operating within the narrower "constrained leg" between Tobermory-Craignure (which is approx 500m wide and was re-planned to avoid the Glenforsa visual circuit). If the SUA is unable to execute a simple turn within 500m (either due to performance or software limitations?), can Skyports confirm how it will have the manoeuvre capability to respond sufficiently to a DAA-generated collision threat?

If such DAA technology does *not* become available, (either because it is not technically feasible for military aircraft or is not mandated/ widely enough implemented by GA), what are Skyports' alternative proposals to allow safely deconflicted SUA operations in unsegregated airspace and facilitate the dis-establishment of the 24 TDAs covered by this and their previous four ACPs? Or will the TDAs simply remain in force indefinitely, effectively causing the permanent loss of this airspace to other users?

3. Carriage of Dangerous Goods (DGs)

DG Regulations - the proof-of-concept flights associated with this ACP and previous Skyports trials in support of the NHS, involve transportation of human blood samples, potentially infected with Covid-19. Thus they are classed as Dangerous Goods, specifically Class 6 "Toxic and infectious substances", Class B.

Can Skyports confirm that in the absence of any specific regulations covering the carriage of DGs by SUAs (or other drones), they are bound by the same DG Regulations as manned aircraft, ie. the IATA

"Dangerous Goods Regulations" and the ICAO "Technical Instructions for the safe transport of Dangerous Goods by air"? If so, can Skyports confirm they have received regulatory approval from the CAA for the carriage of such DGs, specifically on BVLOS operations?

Payload - presumably Skyports must comply with the Packing Instructions for Covid samples (classed as UN3373 by the WHO), as per the ICAO Technical Instructions, specifically Packing Instruction 650. ACP-2020-099, gives the Technical Specifications of the SUA, quoting a max payload of 3kg. However with the reduction in capacity due to the weight/ volume of the required DG packaging, can Skyports say what the actual *useable* payload is? Such transparency would give a clearer picture of the true benefit of the service to the NHS.

Risk and risk reduction - apart from their previous proof-of-concept trials, does Skyports' have any previous experience of carrying DGs on SUAs, especially on BVLOS SUAs or is this a previously untried combination? From my own flight testing background, one of the key concepts was to only test one new piece of equipment or new procedure at a time – this is a core principle in risk reduction within any proof-of-concept trial. By seeking approval to combine BVLOS operations with the carriage of DGs (neither of which yet have full regulatory approval on their own), are Skyports choosing to not follow accepted best practice? Can Skyports say how you intend to mitigate the risks associated with applying two new, untested changes to SUA operations in parallel and are you willing to provide a copy of your Risk Assessment (RA)?

4. The consultation exercise

Targeted stakeholder engagement – it is clear from this and previous ACPs that a large number of stakeholders/ existing airspace users were not approached by Skyports or made aware of proposed airspace changes which would affect their operations. Many of them found out about the ACP through third parties. Whilst it is encouraging to note that Skyports have taken this on board and ask to be informed of any stakeholders you have initially missed, it does show either a lack of due diligence or deficient knowledge of existing airspace users. It certainly doesn't demonstrate Skyports' claim of having "developed a comprehensive picture of airspace usage in that area".

Timeline – Skyports have reduced the engagement period for this ACP down to 3 weeks (vice the 12 weeks recommended in CAP1616). Whilst significantly better than the 5-day engagement period for ACP-2020-038 (Craignure), this decision appears to be based on engagement exercises conducted in support of previous ACP submissions and a desire not to "overburden these stakeholders with an informal engagement exercise". However, as noted above, the repeated failure to identify all affected stakeholders in previous exercises shows they are in no way robust enough to be truncated.

Transparency – currently the procedure under CAP1616 directs stakeholders to respond directly to the ACP Sponsor. Thus all responses are submitted to Skyports who have shared some of these in revisions to the ACP. However, since they are not visible on the CAA's Airspace Change Portal, there is no way of viewing the responses of other stakeholders, nor even knowing *if* they have responded. This does not constitute a full and open consultation process.

Consultation and engagement – in the Glossary section of the ACP, Skyports themselves define these terms as "*developing relationships with stakeholders, including but not limited to consultation, information provision, regular and one-off meetings and fora, workshops and town hall discussions*". To my knowledge, there have been no such meetings or discussions where Skyports have engaged with a group of stakeholders en masse. In the current climate of virtual meetings, this would not be difficult to arrange. There are excellent examples of ACPs recently submitted by other Sponsors who have proactively done just this, notably ACP-2020-100 submitted by the MoD.

Conclusion

Taking all of the above into account, my concern is that this ACP (as with the previous four submitted by Skyports) is being rushed through on the back of an incomplete and severely curtailed consultation

exercise which lacks transparency, under the guise of providing essential Covid support to the NHS. However, when the actual useable payloads are scrutinised, I would contend the true value of this service is questionable and the real motive of the ACP is for the sole benefit of the Sponsor. By using this trial as a means of gaining regulatory approval, it will allow Skyports to achieve their stated intent of expansion – firstly of this service to other islands/ remote communities but ultimately as a way into full commercial operations. In your five ACP submissions so far, Skyports have requested the creation of 24 new TDAs and until a robust DAA system is in place, any further expansion will require more, resulting in the current open FIR of the West Coast of Scotland becoming an un-navigable mess of segregated airspace. If the DAA technology necessary for safe SUA operations in unsegregated airspace does not mature sufficiently or is not adopted widely enough by *all* airspace users, these TDAs would have to remain in place indefinitely. The task of safe airspace management then becomes impossibly unwieldy and the airspace is effectively lost permanently to other users. Incrementally, and by stealth, this ACP and its precursors are the airspace equivalent of a land grab. Regrettably, I cannot support it in its current format.

There can be no doubt that drone technology is here to stay – it offers exciting opportunities and low cost solutions. We should embrace all that it has to offer - but in cooperation with and not at the expense of other airspace users. The airspace on the West coast of Scotland is one of the last places in the crowded UK airspace where we can all fly with relative freedom and diverse users can operate largely free of restrictions but with due awareness of each other and respect for their operations. The solution is integration, not segregation.

I strongly urge you to rethink your proposal, re-engage fully with *all* the airspace users in the area to come up with a common solution which works for us all and involves minimal restrictions. The sky on the west coast is big enough for all of us to use – let's try to keep it that way.

████████████████████
████████████████████

31 Jan 2021

Response 94: Individual BE

From: [REDACTED]
Sent: 01 February 2021 12:34
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: ACP2020-099 UAS BVLOS in Segregated Airspace (Oban-Isle of Mull-Coll)
Attachments: ACP-2020-099 Skyports - Oban-Mull-Coll - Targeted Av Stakeholder Eng Material v3.0.pdf

Dear [REDACTED]

Thank you for your feedback, your objection is also noted. I have added you to our list of stakeholders and included a copy of the latest stakeholder engagement material and will ensure any future communication regarding this ACP are shared with you. Appendix C of the document details the principal issues and proposed solutions (based on stakeholder feedback).

Kind regards,

[REDACTED]
[REDACTED]

skyports.net



This email is from Skyports Limited. Skyports Limited is a limited company registered in England and Wales with registered number 10755230. Our office is at Skyports, Unit LG.06, Edinburgh House, 170 Kennington Lane, London, SE11 5DP, United Kingdom. Our registered office is at Kingfisher House, Radford Way, Billericay, Essex, United Kingdom, CM12 0EQ. This message is intended solely for the addressee and is private and confidential. If you have received this message in error, please send it back to us, and immediately and permanently delete it. Do not use, copy or disclose the information contained in this message or in any attachment. Please note that neither Skyports Limited nor the sender accepts any responsibility for viruses and it is your responsibility to scan or otherwise check this email and any attachments.

From: [REDACTED]
Sent: 31 January 2021 23:59
To: [REDACTED]
Subject: ACP2020-099 UAS BVLOS in Segregated Airspace (Oban-Isle of Mull-Coll)

Dear Sir,

My name is [REDACTED]
I am a Member and Shareholder of the Light Aircraft Association

I am writing to object to ACP-2020-099.

I have a private pilot's license and have been regularly flying light aircraft throughout the UK since 2002. I have flown to the west coast of Scotland several times and will hopefully continue to do so in the future.

My main objection to your proposal is that the section on Covid-19 Response fails to make any quantifiable or measurable business case for the establishment of segregated airspace. It is based on very vague and contradictory information and fails to provide any measurable facts as to the actual extent of the current problems, nor any quantifiable benefits resulting from the use of SUA's. The population of Col and Mull amounts to less than 2800 people with absolutely no influx of tourists during the Covid-19 lockdown. You do not state the number of tests to be undertaken in this area nor how many repeat tests could be avoided during this trial period. The proposal has not provided any information on the volume or weight of goods to be transported. Also, if the proposed SUA service is indeed vital, then why are the test samples currently transported by the post office as an 'end of day' delivery and not given any level of urgency. It just doesn't make sense. It reads more like inventing a theoretical case based on a response to the Covid-19 virus in order to justify the proposal.

Another objection to your proposal is that it proposes an option to try and establish TDAs that cover a large amount of uncontrolled airspace, which extends unnecessarily close to the busy airfield of Glenforsa. There is no information on the times for which the TDA will be activated, or constraints on the length of time it might be active.

The airspace around Glenforsa airfield should be considered as a high use area and to protect circuit traffic, the proposed routes should avoid the Sounds of Mull. The proposed routing precludes weather avoidance along the Sound of Mull which is a known GA highway through the area. Why not route to the south of Glenforsa from Tobermory, thereby avoiding disruption and maximising safety for aircraft using the airfield?

There is reference to the Skyports SUA being fitted with ADS-B IN and OUT and the assumption that it will therefore be visible to private pilots on their navigation system. However, it is not a UK requirement for aircraft to be fitted with ADSB in and the majority of aircraft do not currently have this capability. The SUA that you propose to use needs to have a visual "see and avoid" system for other aircraft, as they presumably have for avoiding overhead cables, masts and birds?

There is no demonstration that the proposed SUA's have any established track record of safety and reliability to operate along the proposed routes.

In summary, you propose to prevent long-established aviators users from using UK airspace because of a potential idea that has no demonstrated business case.

Yours sincerely,



Response 95: Individual BF

From: [REDACTED]
Sent: 02 February 2021 14:23
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Skyports Web Enquiry

Dear [REDACTED]

Thank you for your email.

There are two proposed temporary changes to airspace (TDAs), all the relevant details of which can be found on the CAA airspace portal:

ACP-2020-055: <https://airspacechange.caa.co.uk/PublicProposalArea?pid=274>

ACP-2020-099: <https://airspacechange.caa.co.uk/PublicProposalArea?pid=330>

The CAA has reached its decision on ACP-2020-055, which I will be communicating out today.

While the engagement window for ACP-2020-099 closed on Sunday, if you do have any views you would like to contribute, if you could provide them to us by the end of this week then we can ensure your views are incorporated into next steps.

Kind regards

[REDACTED]
[REDACTED]

Subject: Skyports Web Enquiry

From: [REDACTED]

Message:

Just read an article in Microlight flying magazine about proposed drone use in the lochgilphead oban mull area. Id like to hear more esp about the consultation process about which I knew nothing. This is an area that I fly frequently in

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This e-mail was sent from a contact form on Skyports