



**Railscape Ltd t/a RUAS**  
**TDA Temporary Airspace Change**  
**ACP – 2021 – 055**  
**RPAS BVLOS Operations Near Dunbar**

**Stakeholder Engagement Summary**

Version 1.2 – 19<sup>th</sup> November 2021

## Amendment Record

Issue	Amendment	Date
V1.0	Initial Issue	15/10/2021
V1.1	Additional Stakeholder Information	21/10/2021
V1.2	Additional Stakeholder Information	19/11/2021

This document is controlled by the Change Sponsor (Railscape Ltd t/a RUAS). The initial version and any subsequent versions will be subject to approval from RUAS UA Operator. Any amendments to this document will be recorded in the amendment record.

If any Stakeholder Engagement offers new information after the published date this document will be updated accordingly and uploaded to the Airspace Change Portal.

## Referenced Documents

Document	Title	Version
CAP 1616	Airspace Change: Guidance on the regulatory process for changing the notified airspace design and planned and permanent redistribution of air traffic, and on providing airspace information.	V4 – 1 <sup>st</sup> March 2021

## Introduction

RUAS have made a request for a TDA for the purpose of RPAS BVLOS Operations near Dunbar. The requirement is to explore the use of RPAS flown BVLOS (up to 3km) to enable wide area data capture for the development of an early warning system for marine ingress near Nuclear Power Plants. RUAS are working in collaboration with Cranfield University to establish the feasibility of BVLOS operations within a regulatory and safety context for use of drones near nuclear plants for early detection ingress of jellyfish and kelp. The project aim is to collect data from AIC publication date (estimated to be December 2021 for the 90 day validity period, to achieve this multiple BVLOS flights will be conducted within the TDA during the designated period. All flights will be notified a minimum of 24 hours before the intended flight via NOTAM, the dimensions of the flight will be the minimum to carry out the intended task.

## Target Engagement Consultation

After a successful Assessment Meeting with CAA Airspace Regulations team on 14<sup>th</sup> September to discuss RUAS' Statement of Need and the requirement for the TDA, it was agreed that a Temporary Danger Area was appropriate and falls within the scope of a scaled CAP 1616 process for the intended operations near Dunbar.

As a result of this there is a requirement to conduct a targeted Aviation Stakeholder Engagement activity. This document provides a summary of RUAS' Stakeholder Engagement activity completed between 17<sup>th</sup> September – 15<sup>th</sup> October, this has allowed aviation stakeholders to formally comment on RUAS' planned TDA design and Operational Processes.

RUAS have declared a timeline of 3.5 weeks for the Stakeholder Engagement with all concerns to be sent NLT 15<sup>th</sup> October 2021. This is a shortened timeline than recommended due to the nature of the TDA, all BVLOS flights will be out to sea at a height of no more than 400ft therefore we feel the impact on other air users to be minimal.

RUAS will provide a minimum of 24 hours' notice to activate the TDA, the proposed location is within class G airspace and falls in line with the CAA buffer policy as it is away from other airspace users. RUAS will issue contact details within the NOTAM information, this will include RUAS' office number and the mobile contact number of the designated lead pilot. If any other air users require use the airspace for emergency purposes such as air ambulance etc. they would get priority and we would bring any aircraft back to land immediately to allow for this.

## Stakeholder Engagement Approach

The aim of this Stakeholder Engagement is to ascertain the impact of the change proposal for ACP-2021-055 (RPAS BVLOS Operations near Dunbar) on others and the implications those impacts may have.

RUAS initially liaised with the CAA Engagement and Consultation Regulator and the CAA Flight Operations Training Inspector to ascertain all relevant stakeholders that may directly or indirectly be affected by the proposed TDA. Due to the nature of the proposed project although the process does not require it, engagement with local environmental stakeholders and the local council have been identified as appropriate in this instance.

All identified Stakeholders were contacted via email or telephone where email was not available.

## List of Stakeholders

RUAS have identified and contacted the following Stakeholders that may be impacted:

Stakeholder	Point of Contact	Contact Email Address
East Lothian Council		
Police Scotland, operated by Babcock Onshore		
Scottish Charity Air Ambulance operated by Babcock Onshore		
Scottish Air Ambulance Service operated by Gama Aviation		
Search and Rescue operated by Bristow Helicopters		
PDG Helicopters		
Fisheries and pollution patrol operated by 2Excel contact		
East Fortune Airfield		
Aviation Environment Federation (AEF)		
British Helicopter Association (BHA)		
General Aviation Alliance (GAA)		
Guild of Air Traffic Control Officers (GATCO)		
Helicopter Club of Great Britain (HCGB)		

Iprosurv		
Light Aircraft Association (LAA)		
Military Aviation Authority (MAA)		
Ministry of Defence - Defence Airspace and Air Traffic Management (MoD DAATM)		
NATS		
NATS		
Navy Command HQ		
UK Airprox Board (UKAB)		
Airspace Change Organising Group (ACOG)		
Airfield Operators Group (AOG)		
Charterhall Airfield		
Restricted Area – Torness EGR 516		
Edinburgh Airfield / ATZ / CTA		
Isle of May Bird Sanctuary		
RNLI Dunbar Lifeboat Station		
Woodhall Dean		
Scottish Seabird Centre		
North Berwick Harbour Trust		
Dunbar Harbour Trust		
St Abbs Marine Station		
Airspace4All		
Aircraft Owners and Pilots Association (AOPA)		
East of Scotland Microlight Centre		
East Fortune – local runway for light aircraft		
EDF Energy (Torness Nuclear Power Station)	Head of Site Security	
BMAA Airspace Group		

## Proposed Airspace Design - TDA

RUAS have made a request for a TDA for the purpose of RPAS BVLOS operations near Dunbar. The location is identified below by the red shaded area in Figure 1 (56°00'25.4"N 2°33'46.6"W).

RUAS require a volume of segregated airspace within which to safely execute its BVLOS operations. The airspace will extend from the surface to 400ft.

Figure 1



Figure 2



## Notification of TDA

CAA Airspace Regulation will promulgate TDA activation via NOTAM. RUAS will provide a minimum of 24 hours' notice to activate the TDA, within this notification RUAS will issue contact details, this will include RUAS' office number and the mobile contact number of the designated lead pilot.

## TDA Activation

Activation Dates	Operating Hours
From AIC publication date - estimated to be December 2021 for the 90-day validity period	10.00 – 15.00 Daily

## Stakeholder Engagement Initial Detail

RUAS have contacted all identified stakeholders detailing the following information.

- Introduction to the TDA – Temporary Danger Area: This is temporary airspace which has been notified as such, within which activities dangerous to the flight of aircraft may take place or exist, at such times as may be notified.
- Location of the proposed TDA
- Statement of Need
- TDA Requirement
- Intended Project Detail
- Proposed Timeline

Below is the initial email sent and a link to the attached PowerPoint presentation, providing further information:

## Initial Stakeholder Engagement Email

**From:** [REDACTED]  
**Sent:** 16 September 2021 14:44  
**Subject:** Initial Stakeholder Engagement TDA - Temporary Airspace Change, ACP-221-055 - RPAS BVLOS Operation at Broadhaven Near Dunbar  
**Attachments:** Stakeholder Engagement Information.pdf  
**Importance:** High

Good Afternoon,

We at RUAS are the UK Leading drone services provider, specialising in:

- Drone Survey
- 3D Modelling
- Orthomosaics
- Video Photogrammetry
- Offshore Oil and Gas
- Drone Detection
- PDRA-02 25Kg – 150Kg
- Extended Visual Line of Sight Permissions

RUAS are working in collaboration with Cranfield University to establish the feasibility of BVLOS (Beyond Visual Line of Sight) Operations within a regulatory and safety context for the use of Drones near Nuclear Power Plants for the early detection of marine ingress. To make this possible we have requested to set up a TDA (Temporary Danger Area) over a 90 day period between December 2021 and February 2022 at [located near Dunbar](#).

All BVLOS Operations will be notified a minimum of 24 hours in advance via NOTAM, all operations will be flown out to sea at a maximum distance of 3km and maximum height of 400ft.

Part of conducting this project, we are required by the CAA CAP1616 Part 1a Temporary Changes to engage with all relevant stakeholders to ensure that the TDA imposes minimal impact to all other air user and environmental agencies.

We kindly ask for your feedback, specifically in the following areas:

- Does the proposed TDA impact the safety of your operations in anyway?
- If so, is there a change in the TDA that would remove or minimise this impact?
- Does the proposed TDA change alter traffic patterns under 7000ft over inhabited areas?
- Are there any additional notifications or procedures that you require beyond the NOTAM service?

Please find attached the stakeholder engagement information relating to the requirement and project aim.

If you have any queries or require further information, please do not hesitate to contact me.

Best Regards

[REDACTED]

## [Stakeholder Engagement Information Attachment](#)

**Below is a summary of the responses received and any changes required to accommodate them:**

<b>No.</b>	<b>Stakeholder</b>	<b>Type of Organisation</b>	<b>Response</b>	<b>Comments to Note</b>
1.	Police Scotland	Emergency Services	Yes	No Objections
2.	Scottish Charity Air Ambulance	Air User	Yes	No Objections
3.	Scottish Air Ambulance Service	Air User	None	None
4.	Search and Rescue	Air User	None	None
5.	PDG Helicopters	Air User	None	None
6.	Fisheries and Pollution Patrol	Environmental	Yes	No Objections
7.	Aviation Environment Federation (AEF)	Environmental & Air User	None	None
8.	British Helicopter Association (BHA)	Air User	Yes	See Below
9.	General Aviation Alliance (GAA)	Air User	None	None
10.	Guild of Air Traffic Control Officers (GATCO)	Air User	None	None
11.	Helicopter Club of Great Britain (HCGB)	Air User	None	None
12.	Iprosurv		None	None
13.	Light Aircraft Association (LAA)	Air User	None	None
14.	Military Aviation Authority (MAA)	Military & Air User	None	None
15.	Ministry of Defence - Defence Airspace and Air Traffic Management (MoD DAATM)	Military & Air User	Yes	No Objections
16.	NATS	Air User	Yes	No Objections
17.	Navy Command HQ	Military & Air User	None	None
18.	UK Airprox Board (UKAB)	Air User	None	None
19.	Airspace Change Organising Group (ACOG)	Air User	None	None
20.	Airfield Operators Group (AOG)	Air User	Yes	No Comments to make
21.	Charterhall Airfield	Air User	None	None
22.	Edinburgh Airfield / ATZ / CTA	Air User	Called - Left Message	None
23.	Isle of May Bird Sanctuary	Environmental	None	None
24.	RNLI Dunbar Lifeboat Station	Emergency Services	None	None
25.	Woodhall Dean	Environmental	None	None
26.	Scottish Seabird Centre	Environmental	None	None
27.	North Berwick Harbour Trust	Environmental	None	None
28.	Dunbar Harbour Trust	Environmental	Yes	No issues raised – see response below
29.	St Abbs Marine Station	Environmental	None	None
30.	Airspace4All	Air User	None	None
31.	General Aviation Alliance (GAA)	Air User	None	None
32.	Aircraft Owners and Pilots Association (AOPA)	Air User	None	None



33.	East of Scotland Microlight Centre	Air User	Yes	Yes – See Feedback Below
34.	East Fortune – local runway for light aircraft	Air User	None	None
35.	East Fortune Aeromodellers Group	Air User	None	None
36.	East Lothian Council		Yes	Yes – See Feedback Below
37.	EDF Energy (Torness Nuclear Power Station)	Environmental	Yes	Yes – See Feedback Below
38.	BMAA Airspace Group	Air User	Yes	Yes – See Feedback Below

## Stakeholder Engagement Feedback

### 1. Police Scotland & 2. Scottish Charity Air Ambulance

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 08 October 2021 13:53  
**To:** [REDACTED]  
**Subject:** RE: CAUTION: External email - Reminder Initial Stakeholder Engagement TDA - Temporary Airspace Change, ACP-221-055 - RPAS BVLOS Operation Near Dunbar (UNCLASSIFIED)

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

**Classification:** UNCLASSIFIED

[REDACTED]

Thanks for getting back to me so promptly and answering my question.


Really appreciated.

BW,

[REDACTED]

[www.babcockinternational.com](http://www.babcockinternational.com)

**babcock**<sup>™</sup>

 Please consider the environment before printing this email

---

**From:** [REDACTED]  
**Sent:** 08 October 2021 12:49  
**To:** [REDACTED]  
**Subject:** RE: CAUTION: External email - Reminder Initial Stakeholder Engagement TDA - Temporary Airspace Change, ACP-221-055 - RPAS BVLOS Operation Near Dunbar (UNCLASSIFIED)

Good Afternoon [REDACTED]

Thank you very much for getting back to us.

In regards to the TDA Notam publication we will ensure that a contact number for the RUAS office and mobile contact number for the Lead Remote Pilot are published on the NOTAM. We will also ensure that priority is given to the emergency services and Category A missions over our BVLOS operations, therefore once notified, the Remote Pilot will return the UA to the home location and land the aircraft at the earliest opportunity. Flight Operations will not resume until it is safe to do so.

If you have any further comments or queries, please do not hesitate to contact me.

## 1. Police Scotland & 2. Scottish Charity Air Ambulance (cont'd)

Best Regards

[REDACTED]  
Business Support Co-ordinator



[REDACTED]

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**From:** [REDACTED]  
**Sent:** 08 October 2021 11:46  
**To:** [REDACTED]  
**Subject:** RE: CAUTION: External email - Reminder Initial Stakeholder Engagement TDA - Temporary Airspace Change, ACP-221-055 - RPAS BVLOS Operation Near Dunbar (UNCLASSIFIED)

**Classification:** UNCLASSIFIED

Hi [REDACTED]

Many thanks for your email. As the operators of HEMS, Air Ambulance and police helicopters in Scotland I have discussed your proposed TDA with our Senior Scottish pilot and we do not have any concerns or objections.

Can you please confirm that when the TDA NOTAM is published it will contain a contact telephone number that we might use if tasked into the TDA on a Category A mission? This will allow us to ascertain the status of your vehicle and ask for it to be grounded if necessary?

Best wishes,


[REDACTED]

[REDACTED]


Babcock International Group

## 1. Police Scotland & 2. Scottish Charity Air Ambulance (cont'd)


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**From:**   
**Sent:** 06 October 2021 14:08  
**Subject:** CAUTION: External email - Reminder Initial Stakeholder Engagement TDA - Temporary Airspace Change, ACP-221-055 - RPAS BVLOS Operation Near Dunbar  
**Importance:** High

Good Afternoon,

With reference to the email below, we will be looking to submit our findings to the CAA on the 15<sup>th</sup> October 2021, therefore any comments that you have in relation to this TDA, please can you send through by 14<sup>th</sup> October 2021.

If you have any queries, please do not hesitate to contact me.

Best Regards

  
Business Support Co-ordinator



  
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## 1. Police Scotland & 2. Scottish Charity Air Ambulance (cont'd)

---

**From:** [REDACTED]  
**Sent:** 16 September 2021 14:44  
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Good Afternoon,

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All BVLOS Operations will be notified a minimum of 24 hours in advance via NOTAM, all operations will be flown out to sea at a maximum distance of 3km and maximum height of 400ft.

Part of conducting this project, we are required by the CAA CAP1616 Part 1a Temporary Changes to engage with all relevant stakeholders to ensure that the TDA imposes minimal impact to all other air user and environmental agencies.

We kindly ask for your feedback, specifically in the following areas:

- Does the proposed TDA impact the safety of your operations in anyway?
- If so, is there a change in the TDA that would remove or minimise this impact?
- Does the proposed TDA change alter traffic patterns under 7000ft over inhabited areas?
- Are there any additional notifications or procedures that you require beyond the NOTAM service?

Please find attached the stakeholder engagement information relating to the requirement and project aim.

If you have any queries or require further information, please do not hesitate to contact me.

Best Regards

[REDACTED]  
Business Support Co-ordinator

## 6. Fisheries and Pollution Patrol

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 07 October 2021 13:10  
**To:** [REDACTED]  
**Subject:** RE: Reminder Initial Stakeholder Engagement TDA - Temporary Airspace Change, ACP-221-055 - RPAS BVLOS Operation Near Dunbar

Good Afternoon [REDACTED]

Thank you very much for confirming, I will record your response.

If you do have any queries in regards to this TDA, please do not hesitate to contact either myself or a member of the team.

Best Regards

[REDACTED]  
Business Support Co-ordinator



[REDACTED]

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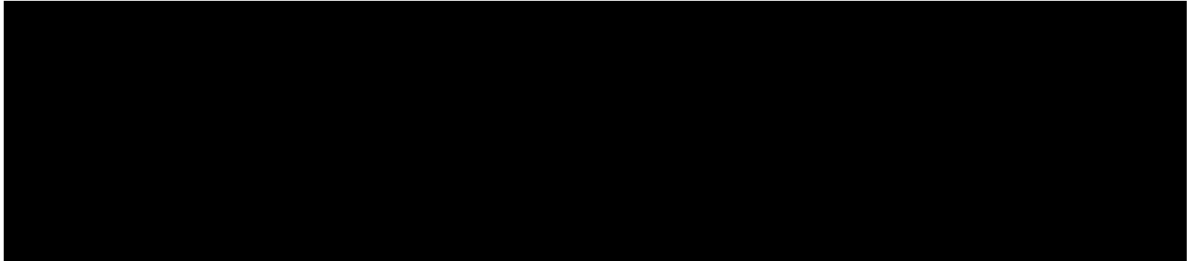
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**From:** [REDACTED]  
**Sent:** 06 October 2021 15:20  
**To:** [REDACTED]  
**Subject:** RE: Reminder Initial Stakeholder Engagement TDA - Temporary Airspace Change, ACP-221-055 - RPAS BVLOS Operation Near Dunbar

## 6. Fisheries and Pollution Patrol (cont'd)

Hello

No objections or comments from us.



**Aviation from a World-Class Team**

Registered Office: The Tiger House | Sywell Aerodrome | Sywell | Northampton | NN6 0BN | Company No: 05391365

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**From:** [REDACTED]

**Sent:** 06 October 2021 14:08

**Subject:** Reminder Initial Stakeholder Engagement TDA - Temporary Airspace Change, ACP-221-055 - RPAS BVLOS Operation Near Dunbar

**Importance:** High

Good Afternoon,

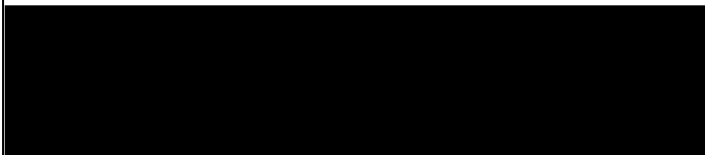
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If you have any queries, please do not hesitate to contact me.

Best Regards

[REDACTED]

Business Support Co-ordinator



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## 6. Fisheries and Pollution Patrol (cont'd)



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**From:** [REDACTED]

**Sent:** 16 September 2021 14:44

**Subject:** Initial Stakeholder Engagement TDA - Temporary Airspace Change, ACP-221-055 - RPAS BVLOS Operation at Broadhaven Near Dunbar

**Importance:** High

Good Afternoon,

We at RUAS are a leading drone service provider, specialising in:

- Drone Survey
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- Offshore Oil and Gas
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- PDRA-02 25Kg – 150Kg
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All BVLOS Operations will be notified a minimum of 24 hours in advance via NOTAM, all operations will be flown out to sea at a maximum distance of 3km and maximum height of 400ft.

Part of conducting this project, we are required by the CAA CAP1616 Part 1a Temporary Changes to engage with all relevant stakeholders to ensure that the TDA imposes minimal impact to all other air user and environmental agencies.

We kindly ask for your feedback, specifically in the following areas:

- Does the proposed TDA impact the safety of your operations in anyway?
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## 6. Fisheries and Pollution Patrol (cont'd)

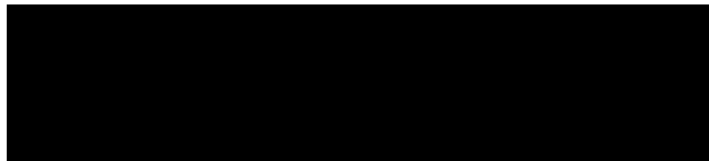
Please find attached the stakeholder engagement information relating to the requirement and project aim.

If you have any queries or require further information, please do not hesitate to contact me.

Best Regards

[Redacted Signature]

Business Support Co-ordinator



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## 8. British Helicopter Association

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 21 September 2021 13:53  
**To:** ceo  
**Subject:** RE: Initial Stakeholder Engagement TDA - Temporary Airspace Change, ACP-221-055 - RPAS BVLOS Operation at Broadhaven Near Dunbar

Good Afternoon [REDACTED]

Thank you for your feedback, the contact number for will be [REDACTED]

Once we activate a NOTAM all relevant contact information, including the pilots mobile number will be listed in case of emergencies.

If you require further details, please do not hesitate to contact me.

Best Regards

[REDACTED]  
Business Support Co-ordinator



[REDACTED]

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---

**From:** [REDACTED]  
**Sent:** 21 September 2021 12:47  
**To:** [REDACTED]

## 8. British Helicopter Association (cont'd)

**Subject:** RE: Initial Stakeholder Engagement TDA - Temporary Airspace Change, ACP-221-055 - RPAS BVLOS Operation at Broadhaven Near Dunbar

I have had a response from the Scottish Air Ambulance and they point out that you do not give a frequency or contact telephone number they can ring should they need access to the TDA for operational reasons. The Police Helicopters and SAR would need the same facility and it is published as part of most TDA ACPs.

---

**From** [REDACTED]

**Sent:** 16 September 2021 14:44

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**Importance:** High

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## 8. British Helicopter Association (cont'd)

Best Regards

[REDACTED]  
Business Support Co-ordinator



[REDACTED]

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## 15. Ministry of Defence - Defence Airspace and Air Traffic Management (MoD DAATM)

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 08 October 2021 09:42  
**To:** [REDACTED]  
**Subject:** RE: Initial Stakeholder Engagement TDA - Temporary Airspace Change, ACP-221-055 - RPAS BVLOS Operation at Broadhaven Near Dunbar

Good morning [REDACTED]

Having consulted MOD airspace users, I can confirm that there is no objection to your ACP-2021-55 Dunbar TDA.

Many thanks for your engagement.

Best regards,

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 16 September 2021 14:44  
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**Importance:** High

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All BVLOS Operations will be notified a minimum of 24 hours in advance via NOTAM, all operations will be flown out to sea at a maximum distance of 3km and maximum height of 400ft.

## 15. Ministry of Defence - Defence Airspace and Air Traffic Management (MoD DAATM) (cont'd)

Part of conducting this project, we are required by the CAA CAP1616 Part 1a Temporary Changes to engage with all relevant stakeholders to ensure that the TDA imposes minimal impact to all other air user and environmental agencies.

We kindly ask for your feedback, specifically in the following areas:

- Does the proposed TDA impact the safety of your operations in anyway?
- If so, is there a change in the TDA that would remove or minimise this impact?
- Does the proposed TDA change alter traffic patterns under 7000ft over inhabited areas?
- Are there any additional notifications or procedures that you require beyond the NOTAM service?

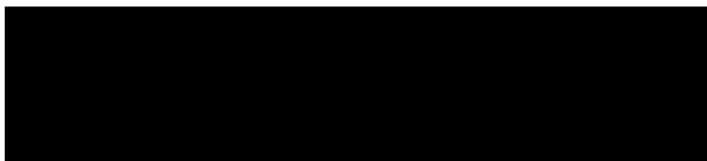
Please find attached the stakeholder engagement information relating to the requirement and project aim.

If you have any queries or require further information, please do not hesitate to contact me.

Best Regards

[Redacted Signature]

Business Support Co-ordinator



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## 15. Ministry of Defence - Defence Airspace and Air Traffic Management (MoD DAATM) (cont'd)

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 17 September 2021 12:31  
**To:** [REDACTED]  
**Subject:** RE: Initial Stakeholder Engagement TDA - Temporary Airspace Change, ACP-221-055 - RPAS BVLOS Operation at Broadhaven Near Dunbar

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

[REDACTED]

I have asked for comments NLT 5 Oct, so I can collate and respond to you. If I get them back earlier, I will of course action ASAP.

Best regards,

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 17 September 2021 11:20  
**To:** [REDACTED]  
**Subject:** RE: Initial Stakeholder Engagement TDA - Temporary Airspace Change, ACP-221-055 - RPAS BVLOS Operation at Broadhaven Near Dunbar

Good Morning [REDACTED]

Thank you for getting back to me and appreciate your help in this matter.

We need to provide an summary report to the CAA by the 15<sup>th</sup> October, therefore if you could reply before then with your comments that would be great.

If you require further information or have any questions, please do not hesitate to contact me.

Have a good weekend.

Best Regards

[REDACTED]  
Business Support Co-ordinator

## 15. Ministry of Defence - Defence Airspace and Air Traffic Management (MoD DAATM) (cont'd)



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---

**From:** [Redacted]  
**Sent:** 17 September 2021 09:20  
**To:** [Redacted]  
**Subject:** RE: Initial Stakeholder Engagement TDA - Temporary Airspace Change, ACP-221-055 - RPAS BVLOS Operation at Broadhaven Near Dunbar

Good morning [Redacted]

I will be responsible for identifying any impact to MOD and will shortly address MOD airspace users – may I please ask what the deadline is for returns, as I could not see a timeline below or in the attached consultation document?

Best regards,

[Redacted]

[Redacted]

---

**From:** [Redacted]  
**Sent:** 16 September 2021 14:44  
**Subject:** Initial Stakeholder Engagement TDA - Temporary Airspace Change, ACP-221-055 - RPAS BVLOS Operation at Broadhaven Near Dunbar  
**Importance:** High

Good Afternoon,



## 15. Ministry of Defence - Defence Airspace and Air Traffic Management (MoD DAATM) (cont'd)

We at RUAS are the UK Leading drone services provider, specialising in:

- Drone Survey
- 3D Modelling
- Orthomosaics
- Video Photogrammetry
- Offshore Oil and Gas
- Drone Detection
- PDRA-02 25Kg – 150Kg
- Extended Visual Line of Sight Permissions

RUAS are working in collaboration with Cranfield University to establish the feasibility of BVLOS (Beyond Visual Line of Sight) Operations within a regulatory and safety context for the use of Drones near Nuclear Power Plants for the early detection of marine ingress. To make this possible we have requested to set up a TDA (Temporary Danger Area) over a 90 day period between December 2021 and February 2022 at [located near Dunbar](#).

All BVLOS Operations will be notified a minimum of 24 hours in advance via NOTAM, all operations will be flown out to sea at a maximum distance of 3km and maximum height of 400ft.

Part of conducting this project, we are required by the CAA CAP1616 Part 1a Temporary Changes to engage with all relevant stakeholders to ensure that the TDA imposes minimal impact to all other air user and environmental agencies.


We kindly ask for your feedback, specifically in the following areas:

- Does the proposed TDA impact the safety of your operations in anyway?
- If so, is there a change in the TDA that would remove or minimise this impact?
- Does the proposed TDA change alter traffic patterns under 7000ft over inhabited areas?
- Are there any additional notifications or procedures that you require beyond the NOTAM service?

Please find attached the stakeholder engagement information relating to the requirement and project aim.

If you have any queries or require further information, please do not hesitate to contact me.

Best Regards

  
Business Support Co-ordinator



  
[LinkedIn](#) | [Facebook](#) | [Twitter](#)

## 16. NATS

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 12 October 2021 11:51  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Initial Stakeholder Engagement TDA - Temporary Airspace Change, ACP-221-055 - RPAS BVLOS Operation at Broadhaven Near Dunbar

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

Hi [REDACTED]

Thank you for providing NATS the opportunity to review and respond to your consultation.

We can confirm that there isn't an impact on our operation – here are the answers to your questions:

- Does the proposed TDA impact the safety of your operations in anyway? **No**
- If so, is there a change in the TDA that would remove or minimise this impact? **N/A**
- Does the proposed TDA change alter traffic patterns under 7000ft over inhabited areas? **No**
- Are there any additional notifications or procedures that you require beyond the NOTAM service? **No**

Regards

[REDACTED]

[REDACTED]

### NATS Internal

---

**From:** [REDACTED]  
**Sent:** 16 September 2021 14:44  
**Subject:** Initial Stakeholder Engagement TDA - Temporary Airspace Change, ACP-221-055 - RPAS BVLOS Operation at Broadhaven Near Dunbar  
**Importance:** High

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

---

Good Afternoon,

## 16. NATS (cont'd)

We at RUAS are the UK Leading drone services provider, specialising in:

- Drone Survey
- 3D Modelling
- Orthomosaics
- Video Photogrammetry
- Offshore Oil and Gas
- Drone Detection
- PDRA-02 25Kg – 150Kg
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Part of conducting this project, we are required by the CAA CAP1616 Part 1a Temporary Changes to engage with all relevant stakeholders to ensure that the TDA imposes minimal impact to all other air user and environmental agencies.


We kindly ask for your feedback, specifically in the following areas:

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- If so, is there a change in the TDA that would remove or minimise this impact?
- Does the proposed TDA change alter traffic patterns under 7000ft over inhabited areas?
- Are there any additional notifications or procedures that you require beyond the NOTAM service?

Please find attached the stakeholder engagement information relating to the requirement and project aim.

If you have any queries or require further information, please do not hesitate to contact me.

Best Regards

  
Business Support Co-ordinator



  
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## 16. NATS (cont'd)

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 17 September 2021 12:14  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Initial Stakeholder Engagement TDA - Temporary Airspace Change, ACP-221-055 - RPAS BVLOS Operation at Broadhaven Near Dunbar

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

Thanks [REDACTED]

### NATS Internal

---

**From:** [REDACTED]  
**Sent:** 17 September 2021 11:16  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Initial Stakeholder Engagement TDA - Temporary Airspace Change, ACP-221-055 - RPAS BVLOS Operation at Broadhaven Near Dunbar

Good Morning [REDACTED]

Thank you for getting back to me, we have a deadline of the 15<sup>th</sup> October to provide the CAA with our report, therefore before then would be ideal.

In the meantime, if you have any queries or require further information, please do not hesitate to contact me.

Have a good weekend

Best Regards

[REDACTED]  
Business Support Co-ordinator



## 16. NATS (cont'd)

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---

**From:** [REDACTED]  
**Sent:** 16 September 2021 15:00  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Initial Stakeholder Engagement TDA - Temporary Airspace Change, ACP-221-055 - RPAS BVLOS Operation at Broadhaven Near Dunbar

Hi [REDACTED]  
Thank you for your email. Noting that the activity starts in December, please can you confirm when you would like any comments by?  
Thank you  
Rgds  
[REDACTED]

[REDACTED]

### NATS Internal

---

**From:** [REDACTED]  
**Sent:** 16 September 2021 14:44  
**Subject:** Initial Stakeholder Engagement TDA - Temporary Airspace Change, ACP-221-055 - RPAS BVLOS Operation at Broadhaven Near Dunbar  
**Importance:** High

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

Good Afternoon,

We at RUAS are the UK Leading drone services provider, specialising in:

- Drone Survey
- 3D Modelling
- Orthomosaics

## 16. NATS (cont'd)

- Video Photogrammetry
- Offshore Oil and Gas
- Drone Detection
- PDRA-02 25Kg – 150Kg
- Extended Visual Line of Sight Permissions

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All BVLOS Operations will be notified a minimum of 24 hours in advance via NOTAM, all operations will be flown out to sea at a maximum distance of 3km and maximum height of 400ft.

Part of conducting this project, we are required by the CAA CAP1616 Part 1a Temporary Changes to engage with all relevant stakeholders to ensure that the TDA imposes minimal impact to all other air user and environmental agencies.

We kindly ask for your feedback, specifically in the following areas:

- Does the proposed TDA impact the safety of your operations in anyway?
- If so, is there a change in the TDA that would remove or minimise this impact?
- Does the proposed TDA change alter traffic patterns under 7000ft over inhabited areas?
- Are there any additional notifications or procedures that you require beyond the NOTAM service?

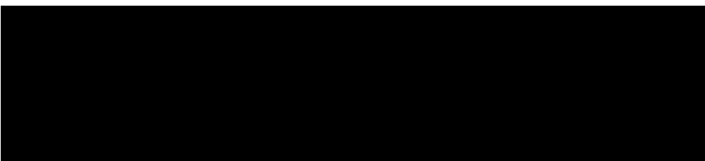
Please find attached the stakeholder engagement information relating to the requirement and project aim.

If you have any queries or require further information, please do not hesitate to contact me.

Best Regards

[Redacted Signature]

Business Support Co-ordinator



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## 20. Airfield Operators Group (AOG)

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 06 October 2021 14:21  
**To:** [REDACTED]  
**Subject:** RE: Reminder Initial Stakeholder Engagement TDA - Temporary Airspace Change, ACP-221-055 - RPAS BVLOS Operation Near Dunbar

Good Afternoon [REDACTED]

Thank you very much for confirming, I will record your response.

If you do have any queries in regards to this TDA, please do not hesitate to contact either myself or a member of the team.

Best Regards

[REDACTED]  
Business Support Co-ordinator



[REDACTED]

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---

**From:** [REDACTED]  
**Sent:** 06 October 2021 14:19  
**To:** [REDACTED]  
**Subject:** Re: Reminder Initial Stakeholder Engagement TDA - Temporary Airspace Change, ACP-221-055 - RPAS BVLOS Operation Near Dunbar  
**Importance:** High

## 20. Airfield Operators Group (AOG) (cont'd)

Thank you.

I have no comment to make.

Regards,

[REDACTED]  
(AOG representative on NATMAC)

On 6 Oct 2021, at 14:07, [REDACTED] wrote:

Good Afternoon,

With reference to the email below, we will be looking to submit our findings to the CAA on the 15<sup>th</sup> October 2021, therefore any comments that you have in relation to this TDA, please can you send through by 14<sup>th</sup> October 2021.

If you have any queries, please do not hesitate to contact me.

Best Regards

[REDACTED]  
Business Support Co-ordinator

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<image002.png>

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---

**From** [REDACTED]

**Sent:** 16 September 2021 14:44

**Subject:** Initial Stakeholder Engagement TDA - Temporary Airspace Change, ACP-221-055 - RPAS  
BVLOS Operation at Broadhaven Near Dunbar

**Importance:** High

Good Afternoon,

We at RUAS are a leading drone service provider, specialising in:

- Drone Survey
- 3D Modelling
- Orthomosaics
- Video Photogrammetry
- Offshore Oil and Gas
- Drone Detection



## 20. Airfield Operators Group (AOG) (cont'd)

- PDRA-02 25Kg – 150Kg
- Extended Visual Line of Sight Permissions

RUAS are working in collaboration with Cranfield University to establish the feasibility of BVLOS (Beyond Visual Line of Sight) Operations within a regulatory and safety context for the use of Drones near Nuclear Power Plants for the early detection of marine ingress. To make this possible we have requested to set up a TDA (Temporary Danger Area) over a 90 day period between December 2021 and February 2022 at [located near Dunbar](#).

All BVLOS Operations will be notified a minimum of 24 hours in advance via NOTAM, all operations will be flown out to sea at a maximum distance of 3km and maximum height of 400ft.

Part of conducting this project, we are required by the CAA CAP1616 Part 1a Temporary Changes to engage with all relevant stakeholders to ensure that the TDA imposes minimal impact to all other air user and environmental agencies.

We kindly ask for your feedback, specifically in the following areas:

- Does the proposed TDA impact the safety of your operations in anyway?
- If so, is there a change in the TDA that would remove or minimise this impact?
- Does the proposed TDA change alter traffic patterns under 7000ft over inhabited areas?
- Are there any additional notifications or procedures that you require beyond the NOTAM service?

Please find attached the stakeholder engagement information relating to the requirement and project aim.

If you have any queries or require further information, please do not hesitate to contact me.

Best Regards

[Redacted Signature]

Business Support Co-ordinator

[Redacted Contact Information]

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<image002.png>

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<Stakeholder Engagement Information.pdf>

## 28. Dunbar Harbour Trust

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 24 September 2021 16:58  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** Fwd: Initial Stakeholder Engagement TDA - Temporary Airspace Change, ACP-221-055 - RPAS BVLOS Operation Near Dunbar  
**Attachments:** Stakeholder Engagement Information - 23092021.pdf  
**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear [REDACTED]

With regard to your questions -

- Does the proposed TDA impact the safety of your operations in anyway? **No**
- If so, is there a change in the TDA that would remove or minimise this impact? **Not applicable**
- Does the proposed TDA change alter traffic patterns under 7000ft over inhabited areas? **Not applicable**
- Are there any additional notifications or procedures that you require beyond the NOTAM service? **No**

Kind regards,

[REDACTED]  
Chairman - Dunbar Harbour Trust

Begin forwarded message:

**From:** Harbour Master <[harbourmaster@dunbarharbourtrust.co.uk](mailto:harbourmaster@dunbarharbourtrust.co.uk)>  
**Subject:** Fwd: Initial Stakeholder Engagement TDA - Temporary Airspace Change, ACP-221-055 - RPAS BVLOS Operation Near Dunbar  
**Date:** 23 September 2021 at 11:07:52 BST  
**To:** [REDACTED]

For your attention,  
Regards,  
[REDACTED]

## 28. Dunbar Harbour Trust (cont'd)

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

From:

To:

Date: 23/09/2021 10:23

Subject: Initial Stakeholder Engagement TDA - Temporary Airspace Change, ACP-221-055 - RPAS BVLOS Operation Near Dunbar

Good Morning,

We at RUAS are a leading drone service provider, specialising in:

- Drone Survey
- 3D Modelling
- Orthomosaics
- Video Photogrammetry
- Offshore Oil and Gas
- Drone Detection
- PDRA-02 25Kg – 150Kg
- Extended Visual Line of Sight Permissions

RUAS are also an leader in drone training within the UK:

- Drone Training (NQE since 2013)
- RAE accreditation since 2021

RUAS are working in collaboration with Cranfield University to establish the feasibility of BVLOS (Beyond Visual Line of Sight) Operations within a regulatory and safety context for the use of Drones near Nuclear Power Plants for the early detection of marine ingress. To make this possible we have requested to set up a TDA (Temporary Danger Area) over a 90 day period between December 2021 and February 2022 at [located near Dunbar](#).

All BVLOS Operations will be notified a minimum of 24 hours in advance via NOTAM, all operations will be flown out to sea at a maximum distance of 3km and maximum height of 400ft.

Part of conducting this project, we are required by the CAA CAP1616 Part 1a Temporary Changes to engage with all relevant stakeholders to ensure that the TDA imposes minimal impact to all other air user and environmental agencies.

## 28. Dunbar Harbour Trust (cont'd)


We kindly ask for your feedback, specifically in the following areas:

- Does the proposed TDA impact the safety of your operations in anyway?
- If so, is there a change in the TDA that would remove or minimise this impact?
- Does the proposed TDA change alter traffic patterns under 7000ft over inhabited areas?
- Are there any additional notifications or procedures that you require beyond the NOTAM service?

Please find attached the stakeholder engagement information relating to the requirement and project aim.

If you have any queries or require further information, please do not hesitate to contact me.

Best Regards

  
Business Support Co-ordinator



### 33. East of Scotland Microlight Centre

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 17 November 2021 16:09  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** Initial Stakeholder Engagement TDA - Temporary Airspace Change, ACP-221-055 - RPAS BVLOS Operation Near Dunbar

Good afternoon [REDACTED]

In response to your email the TDA will be set up with a ceiling height of 450ft AMSL – this is due to a small area of higher ground within the TDA, and is required to allow for the maximum height permitted for UAS operations of 400ft AGL.

This will not affect flight of aircraft above 500ft.

As further mitigation we will include an extra buffer by stating there will be no UAS flight above 350ftAGL thus giving an extra buffer between our operations and the ceiling height of the TDA ensuring operations are as safe as possible.

When the TDA is active there will also be a NOTAM posted a minimum of 24 hours before.

I hope this satisfies your concerns, if you have any further concerns or questions, please let us know.

Kind Regards,

[REDACTED]  
RUAS Instructor



p  
e  
a



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### 33. East of Scotland Microlight Centre (cont'd)

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---

**From:** [REDACTED]  
**Sent:** 17 November 2021 09:34  
**To:** [REDACTED]  
**Subject:** Re: Initial Stakeholder Engagement TDA - Temporary Airspace Change, ACP-221-055 - RPAS BVLOS Operation Near Dunbar

East of Scotland Microlights Response to the proposed TDA at Dunbar by RUAS.

Good morning [REDACTED]

Firstly, apologies for the late reply to this. I see that you were looking to engage with the CAA by 15th October, but we only received your email on 7th October, so have had little time to respond.

We operate a busy full time microlight school from East Fortune Airfield, and the area you are proposing for a Temporary Danger Area is a section of the coastline which we do fly on a regular basis, both training flights and air experience flights.

The area for the TDA is presumably the red shaded area on the chart you have attached. It is not clear what the upper level would be. I know that you have said that your drones will not be operating above 400 feet agl, but is this the upper limit of the proposed TDA?

If the upper limit is 400 feet agl, we would not have an objection to that as we operate a minimum 500 feet in that area. If the TDA was higher than this, we would definitely object to the proposal as it will significantly impact our operations. I am unsure whether a TDA can be set with a 400 ft agl limit, or if it has to be rounded up.

I look forward to hearing from you

Kind Regards

[REDACTED]  
East of Scotland Microlights

On Thu, 7 Oct 2021 at 10:00, [REDACTED]

Good Morning,

We at RUAS are a leading drone service provider, specialising in:

- Drone Survey

### 33. East of Scotland Microlight Centre (cont'd)

- 3D Modelling
- Orthomosaics
- Video Photogrammetry
- Offshore Oil and Gas
- Drone Detection
- PDRA-02 25Kg – 150Kg
- Extended Visual Line of Sight Permissions

RUAS are also an leader in drone training within the UK:

- Drone Training (NQE since 2013)
- RAE accreditation since 2021

RUAS are working in collaboration with Cranfield University to establish the feasibility of BVLOS (Beyond Visual Line of Sight) Operations within a regulatory and safety context for the use of Drones near Nuclear Power Plants for the early detection of marine ingress. To make this possible we have requested to set up a TDA (Temporary Danger Area) over a 90 day period between December 2021 and February 2022 at [located near Dunbar](#).

All BVLOS Operations will be notified a minimum of 24 hours in advance via NOTAM, all operations will be flown out to sea at a maximum distance of 3km and maximum height of 400ft.

Part of conducting this project, we are required by the CAA CAP1616 Part 1a Temporary Changes to engage with all relevant stakeholders to ensure that the TDA imposes minimal impact to all other air user and environmental agencies.

We kindly ask for your feedback, specifically in the following areas:

- Does the proposed TDA impact the safety of your operations in anyway?
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- Does the proposed TDA change alter traffic patterns under 7000ft over inhabited areas?
- Are there any additional notifications or procedures that you require beyond the NOTAM service?

### 33. East of Scotland Microlight Centre (cont'd)

Please find attached the stakeholder engagement information relating to the requirement and project aim.

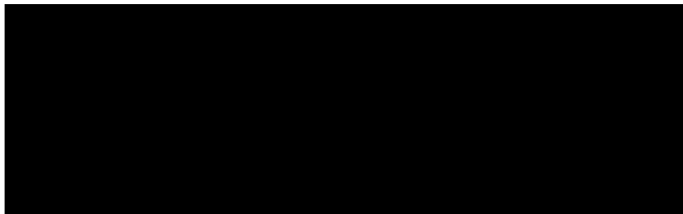
We are looking to submit this information to the CAA on the 15<sup>th</sup> October 2021, therefore any responses would before then would be much appreciated.

If you have any queries or require further information, please do not hesitate to contact me.

Best Regards

[Redacted Signature]

Business Support Co-ordinator



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### 36. East Lothian Council

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 28 September 2021 14:00  
**To:** [REDACTED]  
**Subject:** FW: drone surveys

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Hi [REDACTED]

Another response from [REDACTED] email trail in case it is relevant for the stakeholder engagement (PSB).

Regards,

[REDACTED]  
RUAS Instructor



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---

**From:** [REDACTED]  
**Sent:** 28 September 2021 13:54  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: drone surveys

### 36. East Lothian Council (cont'd)

Dear [REDACTED]

Responses highlighted in yellow below.

Regards  
[REDACTED]

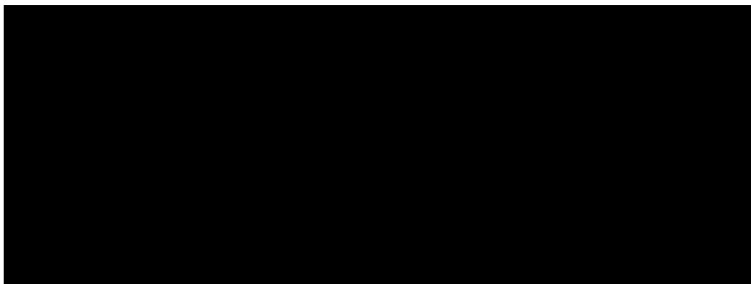
**From:** [REDACTED]  
**Sent:** 27 September 2021 15:18  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: drone surveys

**CAUTION:** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear [REDACTED]

Thanks so much for the prompt response and apologies for the delay in mine.  
Please, find below some comments/questions for your consideration.

Regards,  
[REDACTED]



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### 36. East Lothian Council (cont'd) 36. East Lothian Council (cont'd)

From: [REDACTED]  
Sent: 23 September 2021 10:14  
To: [REDACTED]  
Cc: [REDACTED]  
Subject: RE: drone surveys

Dear [REDACTED]

Many thanks for your email. Answers below.

It would be good at this stage if you could let us know:

1- whether December/January time is suitable for you;

December and January would be fine. However, wildfowlers are allowed to shoot on the Estuary from 2200-1000. They are off the bay between 1000 and 1500. To prevent disturbance of the birds and possibility of flushing them towards the guns I would require that surveys are only carried out between the 1000 and 1500 window, unless pre-arranged with myself and we can do a check onsite to see if there are any wildfowlers present?

"Can I make a correction to my last reply the wildfowlers are in the bay from 1500-1000 they can stay all night! not 2200 -1000."

#I have copied above the correction you added in a follow up email. If I understand correctly, flights can only be undertaken from 10:00 to 15:00. If you could confirm, I would be grateful.  
correct!

2- whether there are any specific areas within the proposed flying area that should not be accessed and;

How will the survey team be accessing?

[REDACTED] will be able to provide further information. Usually they will get access by car to the closest point possible and transfer the equipment to the take-off/landing areas by foot.

I don't know how close to the areas they need to be to fly the drone?

#Take off and landing need to be in close proximity to the pilot so they have full control. Once in the air, the UAV pilot can be >1,500m away from the drone. Therefore, we could select a take off and landing area that is suitable for the pilots (i.e., close proximity to the parking point and extensive enough to allow landing – 30 m) but far away from the most vulnerable areas.

The mudflats shift so I cannot pin point where the "danger" areas would be. I would suggest that not going onto the mudflats if possible would be the safest option.

# I think it would be good for you to be present when the flights are to be conducted so that you can presentially tell the team which areas are to be avoided on the day. The need to avoid mudflats will have to be captured by RUAS when preparing their RAMS.

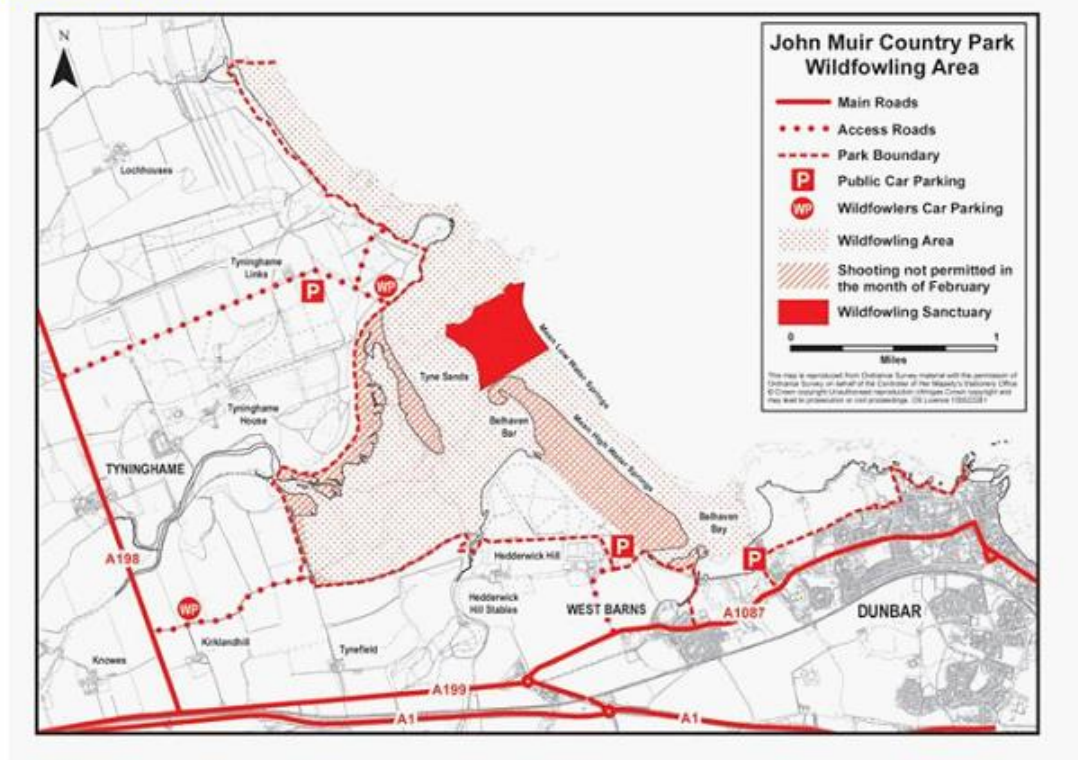
Diary permitting yes I can be present

### 36. East Lothian Council (cont'd)

There are no areas closed to the public during this time. However, again would request that any flying over the wildfowling sanctuary area is as swift as possible. This is an area of rest for the wildfowl during the Wildfowling season. (Sample Permit attached).

If vehicle access is require to get closer to the coast in a few places I can help with that.  
#Vehicle permit may be required. We can plan the flight in such a way that the wildfowling sanctuary is avoided. Our priority is to collect jellyfish images (off-shore) so no need to fly over the sanctuary.

I can arrange access



3- whether there are any environmental groups we should engage with

No – we can make people aware if required.

#Thank you.

If you are using any of the coastal car parks please be aware that there is a £2.50 parking charge.

#Thanks for the info.

If you have any further questions please do not hesitate to contact me. My direct dial is [REDACTED] if you want to discuss anything further.

#We/RUAS will most certainly contact you to discuss all the arrangements closer to the time. Please, could you confirm whether you need to see the risk assessment (RAMS) for the activity?

Would be good for us to have them on file – thanks.

My direct dial is [REDACTED]

Kind regards

[REDACTED]

### 36. East Lothian Council (cont'd)

From: [REDACTED]  
Sent: 22 September 2021 13:33  
To: [REDACTED]  
Cc: [REDACTED]  
Subject: RE: drone surveys

**CAUTION:** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear [REDACTED]

I trust this email finds you well.

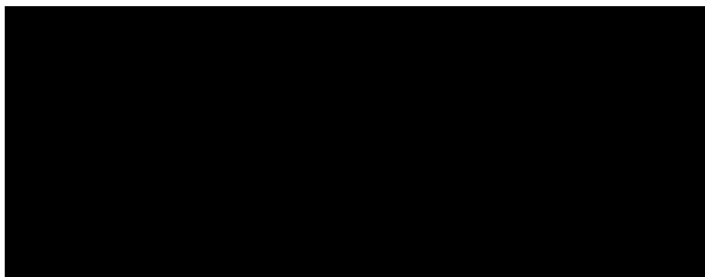
Following the email trail below, we have had further discussions with the Civil Aviation Authority (CAA) to carry out the flights beyond the visual line of sight. RUAS [REDACTED] will be in charge of the mission and will be carrying out the data collection for us. RUAS are preparing all the documentation to obtain the necessary approval with the intention to fly within the area towards the end of December or beginning of January. The CAA requires a period of engagement with air space users to ascertain the suitability of the mission. They have also requested we engage with environmental groups within the area.

It would be good at this stage if you could let us know:

- 1- whether December/January time is suitable for you;
- 2- whether there are any specific areas within the proposed flying area that should not be accessed and;
- 3- whether there are any environmental groups we should engage with

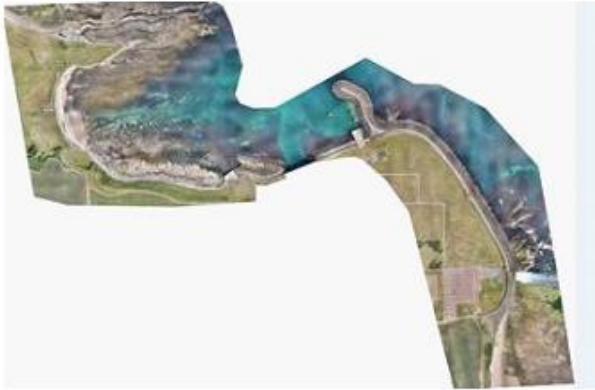
Looking forward to hearing from you soon.

Regards,





### 36. East Lothian Council (cont'd)



- Zoomed in section

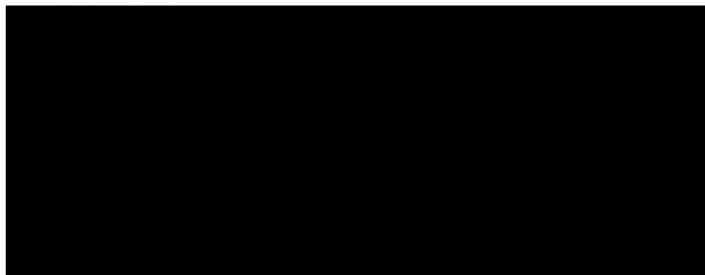


- Increased zoom

### 36. East Lothian Council (cont'd)



Regards,



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### 36. East Lothian Council (cont'd)

---

From: [REDACTED]  
Sent: 27 July 2021 15:04  
To: [REDACTED]  
Cc: [REDACTED]  
Subject: RE: drone surveys

[REDACTED]

Is it possible to send the plan in different format as I have not been able to open it.

Kind regards

[REDACTED]

---

From: [REDACTED]  
Sent: 24 July 2021 22:38  
To: [REDACTED]  
Cc: [REDACTED]  
Subject: RE: drone surveys

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[REDACTED]

Thanks for your email and the positive response.

Our idea is to conduct surveys in that area from October onwards to obtain images of macroalgae when the first set of storms hit the zone. As discussed, we need to obtain permission from the Civil Aviation Authority (CAA) to fly Beyond the Visual Line of Sight so that we can demonstrate the extended capability of drones for the intended purpose. This will take approximately 90 days and we submitted the application last week.

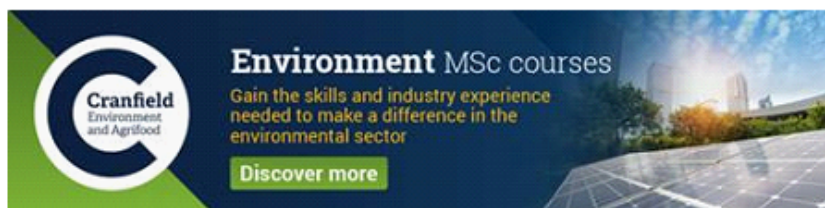
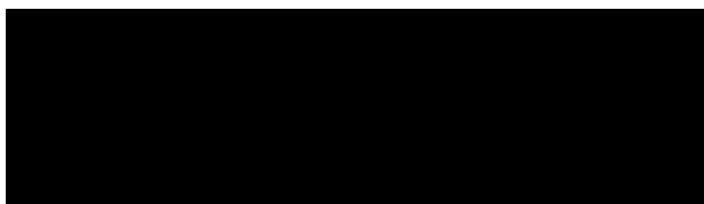
However, we are always looking to gather drone imagery of jellyfish blooms and macroalgae all through the year using more constrained surveying capabilities (e.g., Visual Line of Sight), for which we already have CAA authorisation. So, if there are any particular areas that are affected by macroalgae and jellyfish and you would benefit from high resolution imagery of these areas, please let us know as soon as possible and we will send the drone team up to the area next time jellyfish/macroalgae appear.

I have attached a KML file showing the area we are interested in. We can reduce the area or avoid flying over land if required. Let me know your thoughts.

I will investigate at my end whether we can share the kelp imagery we have with you. I will also explore whether I can get in touch with [REDACTED] and perhaps get the data to you through her.

Regards,

### 36. East Lothian Council (cont'd)



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---

**From:** [Redacted]

**Sent:** 23 July 2021 10:05

**To:** [Redacted]

**Cc:** [Redacted]

**Subject:** FW: drone surveys

[Redacted]

Good to speak yesterday and I can confirm that we are supportive. As such permission is granted to access a suitable site adjacent to Winterfield for flying a drone. There are some habitat and species sensitivities in that area so we'll need to know the exact location for your base and what access requirements; e.g. vehicle, time and dates etc.

As was mentioned we are interested in the data you collect and specifically regarding macro algae given the significant inundations we are having to manage at Dunbar East beach. I note that you will need to get permission from EDF. We do work closely with Torness and specifically Diana Dyce on achieving Biodiversity Challenge accreditation so I hope that your work will be accessible.

Kind regards

[Redacted]

Principal Countryside Officer

[Redacted]

### 36. East Lothian Council (cont'd)

From: [REDACTED]  
Sent: 19 July 2021 19:08  
To: [REDACTED]  
Subject: FW: drone surveys

From: [REDACTED]  
Sent: 19 July 2021 17:19  
To: [REDACTED]  
Subject: drone surveys

**CAUTION:** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear Landscape & Countryside team,

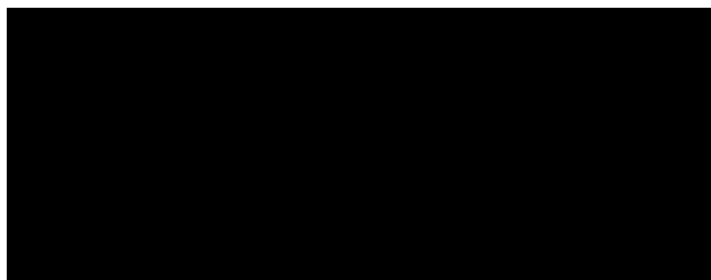
I would like to take this opportunity to introduce myself- [REDACTED] senior lecturer at Cranfield University and the Environment Programme Director. I am currently leading a research project in collaboration with [REDACTED] power plant on the development of an early warning system for jellyfish blooms. For that purposes, we collect drone imagery on a regular basis near the nuclear power plant and are now expanding the flights to the area near Dunbar (Dunbar beach near Winterfield Golf Club area). I would be grateful if you could help us obtain landowner permission to access the site and fly the drones. The work we will carry out will be part of the [Drone Pathfinder Catalyst Programme](#). We would be more than happy to share the data we collect with you or any parties interested (subject to [REDACTED] approval).

Please, let me know if you would like to discuss this over the phone.

Looking forward to hearing from you soon.

Regards,

[REDACTED]



### 37. EDF Energy (Torness Nuclear Power Station)

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 20 October 2021 13:21  
**To:** [REDACTED]  
**Subject:** RE: Initial Stakeholder Engagement TDA - Temporary Airspace Change, ACP-221-055 - RPAS BVLOS Operation Near Dunbar

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

Hi [REDACTED]

The gatehouse contact number will be [REDACTED]

If you could email me over a copy of the permissions so that I can notify our Shift manager and security team leader for the recoprds also

Many thanks

[REDACTED]  
Head of Site Security  
Security Department



[edfenergy.com](https://www.edfenergy.com)

Please consider the environment before printing this email

---

**From:** [REDACTED]  
**Sent:** 20 October 2021 13:14  
**To:** [REDACTED]  
**Subject:** [EXTERNAL] RE: Initial Stakeholder Engagement TDA - Temporary Airspace Change, ACP-221-055 - RPAS BVLOS Operation Near Dunbar

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---

Hi [REDACTED]

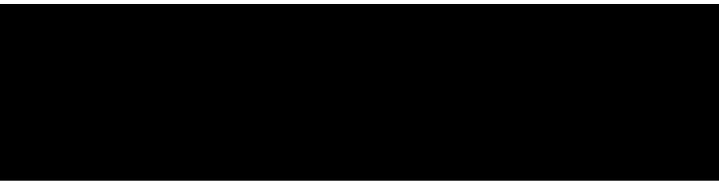
### 37. EDF Energy (Torness Nuclear Power Station) (cont'd)

Great thanks, we will contact you prior to operations begins, if you could forward over the relevant contact details for our records.

In the meantime, if there is anything else we can help with, please do not hesitate to contact either myself or a member of the RUAS team.

Best Regards

[Redacted]  
Business Support Co-ordinator



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---

**From:** [Redacted]  
**Sent:** 20 October 2021 12:56  
**To:** [Redacted]  
**Subject:** RE: Initial Stakeholder Engagement TDA - Temporary Airspace Change, ACP-221-055 - RPAS BVLOS Operation Near Dunbar

Thanks [Redacted]

Either option for 24 hrs notice or popping in to our gatehouse just as you are about to start will do nicely

Regards

[Redacted]  
Head of Site Security  
Security Department  
[Redacted]

### 37. EDF Energy (Torness Nuclear Power Station) (cont'd)



[edfenergy.com](http://edfenergy.com)

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**From:** [REDACTED]  
**Sent:** 20 October 2021 12:18  
**To:** [REDACTED]  
**Subject:** [EXTERNAL] RE: Initial Stakeholder Engagement TDA - Temporary Airspace Change, ACP-221-055 - RPAS BVLOS Operation Near Dunbar

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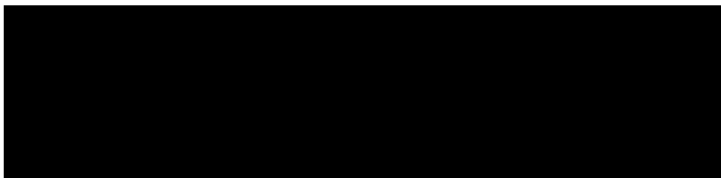
Good Afternoon [REDACTED]

Thank you very much for your swift response, the drone will be utilised off site and off shore, we shall include your response in our TDA CAA application.

When we plan to fly, we will publish a NOTAM a minimum of 24 hour prior to our BVLOS operations, would this suffice, or would you require direct contact before embarking on the project.

Best Regards

[REDACTED]  
Business Support Co-ordinator



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### 37. EDF Energy (Torness Nuclear Power Station) (cont'd)



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**From:** [REDACTED]  
**Sent:** 20 October 2021 11:47  
**To:** [REDACTED]  
**Subject:** RE: Initial Stakeholder Engagement TDA - Temporary Airspace Change, ACP-221-055 - RPAS BVLOS Operation Near Dunbar

Good Morning [REDACTED]

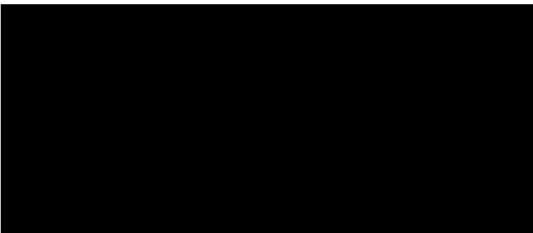
Providing the drone is utilised off site and does not breach the fence line then I see no great issue. We currently have a 2500ft height exclusion zone and don't envisage that the 400m limit you set as an issue for site however CAA may set other limitations.

On a more practical level once we have the approvals from CAA then a notification of exactly when you propose to be utilising the Drone would be helpful so that we can notify the guard force and Civil nuclear constabulary . Once the approvals are through I can provide the contact number for our gatehouse

I trust this helps you with the application

Kind Regards

[REDACTED]  
**Head of Site Security**  
Security Department



[edfenergy.com](http://edfenergy.com)

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### 37. EDF Energy (Torness Nuclear Power Station) (cont'd)

**From:** [REDACTED]  
**Sent:** 20 October 2021 11:34  
**To:** [REDACTED]  
**Subject:** [EXTERNAL] Initial Stakeholder Engagement TDA - Temporary Airspace Change, ACP-221-055 - RPAS BVLOS Operation Near Dunbar  
**Importance:** High

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Good Morning,

We at RUAS are a leading drone service provider, specialising in:

- Drone Survey
- 3D Modelling
- Orthomosaics
- Video Photogrammetry
- Offshore Oil and Gas
- Drone Detection
- PDRA-02 25Kg – 150Kg
- Extended Visual Line of Sight Permissions

RUAS are also an leader in drone training within the UK:

- Drone Training (NQE since 2013)
- RAE accreditation since 2021

RUAS are working in collaboration with Cranfield University to establish the feasibility of BVLOS (Beyond Visual Line of Sight) Operations within a regulatory and safety context for the use of Drones near Nuclear Power Plants for the early detection of marine ingress. To make this possible we have requested to set up a TDA (Temporary Danger Area) over a 90 day period between December 2021 and February 2022 at [located near Dunbar](#).

All BVLOS Operations will be notified a minimum of 24 hours in advance via NOTAM, all operations will be flown out to sea at a maximum distance of 3km and maximum height of 400ft.

Part of conducting this project, we are required by the CAA CAP1616 Part 1a Temporary Changes to engage with all relevant stakeholders to ensure that the TDA imposes minimal impact to all other air user and environmental agencies.

We kindly ask for your feedback, specifically in the following areas:

- Does the proposed TDA impact the safety of your operations in anyway?
- If so, is there a change in the TDA that would remove or minimise this impact?
- Does the proposed TDA change alter traffic patterns under 7000ft over inhabited areas?
- Are there any additional notifications or procedures that you require beyond the NOTAM service?

Please find attached the stakeholder engagement information relating to the requirement and project aim.

We are looking to submit this information to the CAA as soon as possible, therefore a swift responses would be much appreciated.

If you have any queries or require further information, please do not hesitate to contact me.



### 37. EDF Energy (Torness Nuclear Power Station) (cont'd)

Best Regards

[REDACTED]  
Business Support Co-ordinator



[REDACTED]

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[Classification: NOT PROTECTIVELY MARKED]

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[REDACTED]

[Classification: NOT PROTECTIVELY MARKED]

### 38. BMAA Airspace Group

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 16 November 2021 16:55  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: ACP-2021-055 Dunbar TDA

Hi [REDACTED]

We appreciate your email.

Your details and all correspondence will be uploaded to the updated version of our Stakeholder Engagement Summary – we have not included the Engagement detail as a separate upload as the email correspondence has been included within the stakeholder engagement summary.

We did send our stakeholder engagement approach to the CAA and were told that this did not need to be uploaded to the ACP.

We look forward to a response from East Of Scotland Microlights at East Fortune and will discuss any concerns they may have and aim to implement mitigation procedures where required.

Kind Regards,

[REDACTED]  
RUAS Instructor



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### 38. BMAA Airspace Group (cont'd)

---

From: [REDACTED]  
Sent: 16 November 2021 11:24  
To: [REDACTED]  
Cc: [REDACTED]  
Subject: RE: ACP-2021-055 Dunbar TDA

Dear [REDACTED]

Many thanks for your quick reply.

Firstly, I do want to make it clear that we believe your operation is a very valid and worthwhile use of UAV technology. However, with the multitude of ACPs for many different types that have happened over the last couple of years we are finding many issues. One of which is that engagement is not always 'meaningful' and we are not always 'informed'. Because several proposals do have significant impact implications for other airspace users. It is therefore important that all sponsors understand the importance of the process. If one cuts corners all will want to and serious safety risks can be the result. We have pointed several out in other ACPs already.

Microlighting is a sport undertaken by a variety of craft, often at low levels and slow speed. Therefore even low level TDAs can be of significant safety impact and that's why we are keen to be made aware of these ACPs. As an Association we have members throughout Britain and we are trying to keep them informed of these matters so that they can plan flights accordingly. The airspace over our country is a complex and, in places, congested environment.

I must take exception to your contention that all engagement material has been uploaded to the Portal in a timely fashion. That is plainly incorrect. Take a look yourself at the Portal now: <https://airspacechange.caa.co.uk/PublicProposalArea?pid=385>. There is STILL no copy of your Engagement Material on there. And, as I said, the Assessment Meeting Minutes were uploaded on 22 September, 6 days after you deemed Engagement start. The Assessment Meeting Slides and Proposed Time line documents were uploaded on 29 September (the first date where we knew of your Engagement period); 13 days after, when Engagement was only 32 days anyway.

It is an extremely time-consuming task trawling through the Portal to identify ACPs of concern. That is how we only stumbled across your ACP by chance prior to your email to the BMAA on 08 NOV, which, as you say, was only then because I had written to the CAA asking that they ensure all sponsors do engage with the BMAA. Until that point it seemed we had missed the opportunity to be engaged.

I have spoken to East Of Scotland Microlights at East Fortune and they will try to get to respond to you ASAP. Of course, they are running a busy business too and our Association is helped by many volunteers. Thus, time is precious for us also. Another reason why it's important that such Engagements are of sufficient length and ACPs do follow the guidelines with regard to timely publishing of information.

Hoping that you can now add us to your list and keep us informed of developments so that, in turn, we can ensure our members are.

Best regards

[REDACTED]  
BMAA Airspace Group.

---

From: [REDACTED]  
Sent: 15 November 2021 21:34  
To: [REDACTED]  
Cc: [REDACTED]  
Subject: RE: ACP-2021-055 Dunbar TDA

### 38. BMAA Airspace Group (cont'd)

Good evening [REDACTED]

Thank you for your email, in response to your questions:

1. *To date (15NOV21) there is no Engagement material uploaded to the CAA Airspace Change Portal.*

As per the TDA application guidelines and CAP1616 all relevant documentation has been uploaded to the CAA Airspace Change Portal as requested throughout the ACP process, this has included the DAP1619 Statement of Need, Meeting Agenda, Assessment Meeting Minutes, Assessment Meeting Slides, Proposed Timeline and Stakeholder Engagement Summary.

This information can be found at: <https://airspacechange.caa.co.uk/PublicProposalArea?pID=385>

We are listed as Railscape Ltd RUAS under RUAS BVLOS

Airspace change ID: ACP-2021-055.

2. *In the below email you have not stated what the Engagement Period is for this ACP. From the Assessment Meeting Minutes, uploaded to the Portal on 22SEP21, we note:.*  
*As Engagement and Consultation Regulator, [redacted] stated that there is a requirement to conduct a Targeted Stakeholder Engagement activity. The TDA Policy sets out a 6-week engagement period but if a lesser period is to be pursued then an outline of the rationale is outlined in our submission. Rationale can be submitted to the CAA in advance of the engagement activity for consideration. The latter does not appear to have happened.*

As per the TDA application guidelines and CAP1616 during the initial assessment meeting the proposed timeline was discussed and further to this it was decided that a stakeholder engagement period of 3.5 weeks was deemed acceptable due to the nature of the BVLOS operations and the impact on other airspace users. Also, as the operations would be flown out to sea at a maximum distance of 3km and maximum height of 400ft there was little risk to uninvolved persons. All activity within the TDA will be notified via NOTAM a minimum of 24 hours in advance, with priority always given to emergency services who need access to the airspace.

3. *We note from the Proposed Timeline document uploaded to the Portal on 29SEP21 that you expected the Engagement Period to be 17SEP-13OCT21.*

As per the proposed timeline uploaded to the ACP the stakeholder engagement period was between 17<sup>th</sup> September – 13<sup>th</sup> October 2021, correct.

4. *We note that from the Stakeholder Engagement Summary, uploaded to the Portal on 18OCT21, that you state that was a summary of stakeholder engagement activity completed between 17th September – 15th October, this has allowed aviation stakeholders to formally comment on RUAS' planned TDA design and Operational Processes. We note that was just 3.5 weeks. We therefore do not accept that your Engagement is valid when the Engagement period was deemed to have been over before acceptable Engagement material was uploaded to the Portal and thus relevant stakeholders were aware of the ACP.*

The Stakeholder Engagement was conducted in September, all identified Stakeholders were contacted via email with all the information provided, the Stakeholder Engagement Summary was uploaded after the engagement had ended, unfortunately the BMAA were not identified in the initial stakeholder engagement and as a result of this the BMAA were identified by the CAA as a requirement to contact.

The email stated:

*'We have just finished the decision meeting for your TDA BVLOS ACP. Overall, no major issues with what is proposed but it was noticed that the British Microlight Aircraft Association (BMAA) were not engaged. This, coupled with the lack of response from East of Scotland Microlight Centre and East Fortune (East of Scotland Microlights) creates uncertainty that this group of airspace users haven't been reached. I propose to submit the AIC today so that the timescales for implementation can still be met but delay final airspace decision to allow another opportunity for engagement with this group. Could I ask that you contact BMAA and attempt to re-contact East Fortune with the proposal to ensure they have no further input. If you could get back to me with any updates by Tue 23 Nov we will then complete the process.*

### 38. BMAA Airspace Group (cont'd)

*In terms of contact information, I do not hold anything for East Fortune, only their website from google:  
<https://www.eosm.co.uk/home>*

*BMAA contact [REDACTED] believe you may need to contact their airspace lead – hopefully they can give you the contact details.*

*Any problems with contact details or anything else I can help with, please let me know. Obviously if there is still no response, that is ok – we just need to ensure they have had the opportunity to engage prior to final decision.'*

Therefore, we sent the initial stakeholder engagement email to [REDACTED] on 8<sup>th</sup> November – although the AIC process is currently being undertaken if there are any issues as a result of our correspondence this will be relayed to the CAA and our stakeholder engagement summary will be updated with any concerns along with any relevant mitigation. All email correspondence will also be included in the update and uploaded to the ACP.

5. *We also note that in examples of the stakeholder engagement in that Summary that, apparently, you did send out on 16SEP21 you did not inform when the Engagement period was planned to end. This clearly could lead to a situation where your summary showing 'no response' was due to stakeholders not being 'informed' of your deadline and expecting it to be for the normally-required 6-week period, as required by CAP1616, rather than them having no comment.*

There is a full list of the emails we sent out to the stakeholders on 16<sup>th</sup> September within the Stakeholder Engagement Summary (uploaded to the ACP) the dates and times are included in all email trails – just personal information is redacted. Further emails do state the time period of the stakeholder engagement summary as 3.5 weeks – there were occasions where this information was given over the phone. Although the time period was shortened to 3.5 weeks all stakeholders still have the opportunity to contact us after the end date to express any concerns – these concerns will then be addressed, and mitigation procedures discussed between the stakeholders and RUAS – any further contact will be included in an updated version of the Stakeholder Engagement Summary addressing any issues and uploaded to the ACP. The usual 6 weeks has now since lapsed therefore if there were any confusion with stakeholders contacted on 16<sup>th</sup> September they would have been expected to contact us by now – therefore those who have not responded, we will presume do not wish to discuss the application for the TDA further.

6. *So, having come across your ACP by chance we have to advise that your Engagement does not constitute 'meaningful engagement with informed stakeholders'.*

The CAA, in their final decision meeting were happy with our stakeholder engagement – all but contacting the BMAA and East Fortune within the timeframe, BMAA has since been contacted. I do not understand how you came across our ACP by chance, as you stated this email is in response to the initial email we had sent to your CEO on 8<sup>th</sup> November? (Unless you came across it by chance prior to 8<sup>th</sup> November, where it was agreed that it was our oversight in failing to identify the BMAA within our initial Stakeholder Engagement).

7. *We acknowledge receiving your email to the BMAA dated 08NOV21 requesting engagement but, again, with no end of engagement period and still no engagement material uploaded to the Portal so, again, you have not fulfilled CAP1616 requirements. Are we to assume that Engagement will be for 6 weeks from 08NOV21?*

As stated, this was an oversight from ourselves that has now been rectified as per the CAA's request, further to this we would appreciate a prompt response from yourselves, and any concerns raised will be discussed and added to an updated version of the stakeholder engagement summary and uploaded to the ACP. All information required to be uploaded to the ACP was uploaded within the timeframes laid out by the CAA.

8. *Whilst we acknowledge that in the Assessment Meeting Slides and your Stakeholder Engagement Summary (uploaded to the Portal after your deemed Engagement period had started / ended respectively) you illustrate the general area where you plan to operate on a 1:250,000 scale airspace chart and the proposed TDA area on a satellite view image can you please provide your proposed TDA on that chart, since otherwise we have to make some assumptions? On the satellite view the shaded is an unusual shape for a TDA and we cannot assume that will actually be the shape of any TDA. Also, the clue is in the name of the process – an AIRSPACE Change so, fundamentally, the TDA must eventually be promulgated on an airspace chart. Whilst we acknowledge that the TDA you propose to be only up to 400ft above the surface and therefore likely to be of minimal impact to other*



### 38. BMAA Airspace Group (cont'd)

*airspace users can you please confirm the TDA proposed height above mean sea level (AMSL), i.e. altitude, since this is the usual means of denoting airspace and the datum used by aircraft.*

The exact co-ordinates of the TDA are:

- a. 555951N 0023600W;
- b. 560139N 0023600W;
- c. 560139N 0023127W;
- d. 560034N 0023127W;
- e. 555951N 0023257W;
- f. 555951N 0023600W.

The CAA team will promulgate the TDA on an airspace chart during the AIC process that is currently being undertaken, we were told this will be done during this process therefore there is no requirement for RUAS to produce this chart.

9. *We acknowledge that your use of a UAV is very applicable and, given suitable safeguards, should not significantly impact other airspace users, as proposed in that location. However, we feel that you have been ill-advised on the ACP process, which cannot take short-cuts for any specific ACP, irrespective of the purpose, since any airspace change can very seriously impact other stakeholders. Please therefore:*

- a. *Forward to us your proposed TDA on a 1:250,000 scale airspace chart*

The exact co-ordinates of the TDA are:

- a. 555951N 0023600W;
- b. 560139N 0023600W;
- c. 560139N 0023127W;
- d. 560034N 0023127W;
- e. 555951N 0023257W;
- f. 555951N 0023600W.

The CAA team will promulgate the TDA on an airspace chart during the AIC process that is currently being undertaken.

- b. *Advise when you will upload relevant Engagement material to the Portal?*

Upon completion of our correspondence with yourselves (and any other stakeholders yet to respond from the initial engagement) we will upload an updated version of the Stakeholder Engagement Summary, containing all email correspondence, any concerns and methods of mitigation.

- c. *When is now the end of your Engagement period, bearing in mind it should be for a 6-week period?*

Our Stakeholder Engagement period has ended; however the CAA are aware of the lack of communication between RUAS and the BMAA and have agreed that this can be added after the end date in an updated version – any concerns will be addressed and mitigation put in place where required, this will then be uploaded to the ACP and emailed to the CAA.

I appreciate your feedback and apologise for the initial oversight; I hope I have answered all of your questions, if you feel the proposed Temporary Airspace Change will negatively impact the BMAA or any other airspace users, please advise us of your concerns.

If you have any further questions or concerns, please don't hesitate to contact me and we can discuss further.

Kind Regards,

[Redacted Signature]

RUAS Instructor



### 38. BMAA Airspace Group (cont'd)



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From: [Redacted]  
Sent: 15 November 2021 19:10



Subject: ACP-2021-055 Dunbar TDA

I am contacting you on behalf of the British Microlight Aircraft Association (BMAA) following the below email which was sent to our CEO on 08NOV21.

We would like to have the following information included in the Engagement for this ACP:

1. To date (15NOV21) there is no Engagement material uploaded to the CAA Airspace Change Portal.
2. In the below email you have not stated what the Engagement Period is for this ACP. From the Assessment Meeting Minutes, uploaded to the Portal on 22SEP21, we note:  
*As Engagement and Consultation Regulator, [redacted] stated that there is a requirement to conduct a Targeted Stakeholder Engagement activity. The TDA Policy sets out a 6-week engagement period but if a lesser period is to be pursued then an outline of the rationale is outlined in our submission. Rationale can be submitted to the CAA in advance of the engagement activity for consideration.* The latter does not appear to have happened.
3. We note from the Proposed Timeline document uploaded to the Portal on 29SEP21 that you expected the Engagement Period to be 17SEP-13OCT21.
4. We note that from the Stakeholder Engagement Summary, uploaded to the Portal on 18OCT21, that you state that was a summary of stakeholder engagement activity completed between 17th September – 15th October, this has allowed aviation stakeholders to formally comment on RUAS' planned TDA design and Operational Processes. We note that was just 3.5 weeks. We therefore do not accept that your Engagement is valid when the Engagement period was deemed to have been over before acceptable Engagement material was uploaded to the Portal and thus relevant stakeholders were aware of the ACP.
5. We also note that in examples of the stakeholder engagement in that Summary that, apparently, you did send out on 16SEP21 you did not inform when the Engagement period was planned to end. This clearly could lead to a situation where your summary showing 'no response' was due to stakeholders not being 'informed' of your deadline and expecting it to be for the normally-required 6-week period, as required by CAP1616, rather than them having no comment.

### 38. BMAA Airspace Group (cont'd)

6. So, having come across your ACP by chance we have to advise that your Engagement does not constitute 'meaningful engagement with informed stakeholders'.
7. We acknowledge receiving your email to the BMAA dated 08NOV21 requesting engagement but, again, with no end of engagement period and still no engagement material uploaded to the Portal so, again, you have not fulfilled CAP1616 requirements. Are we to assume that Engagement will be for 6 weeks from 08NOV21?
8. Whilst we acknowledge that in the Assessment Meeting Slides and your Stakeholder Engagement Summary (uploaded to the Portal after your deemed Engagement period had started / ended respectively) you illustrate the general area where you plan to operate on a 1:250,000 scale airspace chart and the proposed TDA area on a satellite view image can you please provide your proposed TDA on that chart, since otherwise we have to make some assumptions? On the satellite view the shaded is an unusual shape for a TDA and we cannot assume that will actually be the shape of any TDA. Also, the clue is in the name of the process – an AIRSPACE Change so, fundamentally, the TDA must eventually be promulgated on an airspace chart. Whilst we acknowledge that the TDA you propose to be only up to 400ft above the surface and therefore likely to be of minimal impact to other airspace users can you please confirm the TDA proposed height above mean sea level (AMSL), i.e. altitude, since this is the usual means of denoting airspace and the datum used by aircraft.
9. We acknowledge that your use of a UAV is very applicable and, given suitable safeguards, should not significantly impact other airspace users, as proposed in that location. However, we feel that you have been ill-advised on the ACP process, which cannot take short-cuts for any specific ACP, irrespective of the purpose, since any airspace change can very seriously impact other stakeholders. Please therefore:
  - a. Forward to us your proposed TDA on a 1:250,000 scale airspace chart
  - b. Advise when you will upload relevant Engagement material to the Portal?
  - c. When is now the end of your Engagement period, bearing in mind it should be for a 6-week period?

Thank you for your reply.

Regards

[Redacted Signature]

BMAA Airspace Group



### 38. BMAA Airspace Group (cont'd)

**From:** [REDACTED]  
**Sent:** 08 November 2021 10:10  
**To:** [REDACTED]  
**Subject:** Initial Stakeholder Engagement TDA - Temporary Airspace Change, ACP-221-055 - RPAS BVLOS Operation Near Dunbar  
**Attachments:** Stakeholder Engagement Information.pdf  
**Importance:** High

Good Morning,

We at RUAS are a leading drone service provider, specialising in:

- Drone Survey
- 3D Modelling
- Orthomosaics
- Video Photogrammetry
- Offshore Oil and Gas
- Drone Detection
- PDRA-02 25Kg – 150Kg
- Extended Visual Line of Sight Permissions

RUAS are also an leader in drone training within the UK:

- Drone Training (NQE since 2013)
- RAE accreditation since 2021

RUAS are working in collaboration with Cranfield University to establish the feasibility of BVLOS (Beyond Visual Line of Sight) Operations within a regulatory and safety context for the use of Drones near Nuclear Power Plants for the early detection of marine ingress. To make this possible we have requested to set up a TDA (Temporary Danger Area) over a 90 day period between December 2021 and February 2022 at [located near Dunbar](#).

All BVLOS Operations will be notified a minimum of 24 hours in advance via NOTAM, all operations will be flown out to sea at a maximum distance of 3km and maximum height of 400ft.

Part of conducting this project, we are required by the CAA CAP1616 Part 1a Temporary Changes to engage with all relevant stakeholders to ensure that the TDA imposes minimal impact to all other air user and environmental agencies.

We kindly ask for your feedback, specifically in the following areas:

- Does the proposed TDA impact the safety of your operations in anyway?
- If so, is there a change in the TDA that would remove or minimise this impact?
- Does the proposed TDA change alter traffic patterns under 7000ft over inhabited areas?
- Are there any additional notifications or procedures that you require beyond the NOTAM service?

Please find attached the stakeholder engagement information relating to the requirement and project aim.

### 38. BMAA Airspace Group (cont'd)

We are looking to submit this information to the CAA as soon as possible, therefore a swift responses would be much appreciated.

If you have any queries or require further information, please do not hesitate to contact me.

Best Regards

[Redacted]  
Business Support Co-ordinator



[Redacted]  
[LinkedIn](#) | [Facebook](#) | [Twitter](#)



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## Stakeholder Engagement Summary

Concern	Mitigation
<b>East Lothian Council</b> For the safety of local wildlife, it has been requested that surveys are only carried out between the hours of 10.00 – 15.00 unless prearranged. This is due to Wildfowling permitted shooting time on the Estuary.	RUAS have agreed all BVLOS operations will take place between the hours of 10.00 & 15.00 unless prearranged.
<b>East Lothian Council</b> Due to the unpredictable stability of the mudflats, it is recommended that no flights are conducted from these areas.	The Remote Pilot will identify a suitable location for take-off and landing away from these areas.
<b>East Lothian Council</b> To minimise the disturbance of the birds nesting within the Wildfowling Sanctuary it has been requested that the time spent flying near or directly over the Wildfowling Sanctuary is to be kept to a minimum.	RUAS will ensure all operations over or near the Wildfowling Sanctuary is kept to a minimum during the Wildfowling season.
<b>British Helicopter Association</b> Raised a response received direct from the Scottish Air Ambulance Service - concerns that RUAS have not provided a frequency or contact telephone number in the initial engagement if Emergency Services and SAR would require access to the area and would need to notify RUAS.	RUAS will include contact details of RUAS' office and mobile contact number of the Lead Remote Pilot via NOTAM.
<b>British Helicopter Association</b> Emergency Service Access to TDA during operation.	Emergency services will have priority over RUAS BVLOS operations. As soon as RUAS are informed of any Emergency Service requiring access to the TDA during flight, the Remote Pilot will return the UA to the home location and land the aircraft at the earliest opportunity. Flight Operations will not resume until it is safe to do so.
<b>Babcock International Group, operators of HEMS, Air Ambulance and Police Helicopters in Scotland</b> requested confirmation when the TDA NOTAM is published that it would contain a contact telephone that could be used if tasked into the TDA on a Category A mission, to ascertain the status of our UAV and ground if necessary.	As stated above, Emergency services will have priority over RUAS BVLOS operations and all relevant contact numbers for RUAS will be available on the TDA NOTAM publication to ensure the UA will be grounded at the earliest opportunity.
<b>EDF Energy (Torness Nuclear Power Station)</b> Stated as long as the UA is utilised off site and doesn't breach the fence line there would be no issue. Request for notification prior to commencing BVLOS Operations	Reassured that the UA will be operating offshore, and also stated that we would contact the gatehouse (number provided) prior to operations. We will also provide them a copy of our permissions, if granted.
<b>East Fortune Microlight Centre</b> Stated there was a concern if our BVLOS operations would fly up to 500ft	We have since confirmed and ensure the TDA is set to 450ft AMSL but we will not fly our UAS higher than 350ft AGL to ensure a buffer between the ceiling of our flight and the ceiling height of the TDA.

During this engagement process, a few stakeholders, have provided additional suggestions of others who they feel may be impacted by the proposed TDA. Those deemed appropriate have been contacted and their details added to the Stakeholder List. Contact was made either via telephone or Email.

## **Stakeholder Complaints Process**

Should any Stakeholder have any complaints associated with the TDA change proposal during the initial Stakeholder Engagement, RUAS will endeavour to mitigate the issues surrounding the complaint and manage the Stakeholders expectations accordingly. All complaints will be collated, monitored and reported to the CAA via the online portal.

Should any Stakeholder have any complaints associated with the TDA airspace arrangement once it has been submitted or implemented, at any time throughout its period of operation the nature of the complaint will be assessed and reported to the CAA via the online portal on the level and content of the complaint. Depending on the nature of the complaint RUAS will endeavour to mitigate issues surrounding the complaint as deemed appropriate and necessary.

RUAS accepts that if the basis of stakeholder feedback suggests that the operational use of the temporary airspace is not resulting in the anticipated outcomes the CAA will investigate urgently and take action as appropriate.