

Good Afternoon [REDACTED]

I am writing to you today in relation to the Airspace Change Proposal (ACP) titled “NHS Drone Delivery trials Coventry” (ACP-2021-038). Following on from the Assessment Meeting, you have conducted formal targeted stakeholder engagement to support your pre-assessment meeting informal engagement and you have provided evidence of your engagement in a Summary Report. Noting this was a request to establish a Temporary Danger Area (TDA) to progress the integration of Remotely Piloted Air Systems (RPAS) into logistics chain to support the National Health Service. Furthermore, it was understood the request was to establish a TDA for the period 26 Aug 21- 25 Oct 21, where the TDA would be activated up to 100 times within that period. During which a Danger Area Activity Information Service would be provided by Air Traffic Control at East Midlands Airport.

My colleagues and I have reviewed your ACP and associated documents today. After reviewing both the design and engagement material I am not able to approve this ACP. The proposed design would both cause significant impact to Coventry airfield and surrounding airspace users; the impact (location of the proposed TDAs) to Coventry would necessitate that they are key stakeholders where it is evident that they are not supportive of this proposal and have stated they would be required to close during your operation. Considering the location of the TDA to their operations without further engagement between the parties to reconcile this issue this could either create a safety hazard or significantly impact to Coventry’s existing operations. Out with of the specific impact to Coventry this design and its relation to the Birmingham Control Area has the potential to cause an unintended funnelling effect, where it is not clear this has been considered and mitigated sufficiently given the complexity of the airspaces arrangements. Furthermore the proposed structure does not take into account of the requirements as stipulated within Paragraph 2.6 and 3.2 of [the Special Use Airspace - Safety Buffer policy for airspace design purposes](#), in particular the requirement to ensure adequate separation from Controlled Airspace, the design as presented would therefore also impact the surrounding Controlled Airspace.

A substantial element of the ACP to reduce impact to other airspace users, significantly including HEMS aircraft, is reliant upon the production of relevant Letters of Agreement (LoA). Whilst it is possible for these to be finalised post decision, where conditions of completion are included within the decision, given the significance of the LoAs in this instance we would however expect to review drafts to understand the proposed mitigations. In particular in the absence of these documents being provided it was not clear how these LoAs would function and therefore the respective management processes could not be assessed.

Whilst we could consider delaying the decision period to support the development of the LoAs, ultimately the impact the structure could cause on the airspace may lead to safety concerns. I am therefore not able to approve this ACP. We can of course arrange a meeting should it be required to explain some of these findings. Should you wish to move forward with attempting to establish a temporary structure in that are you are of course permitted to resubmit a new Statement of

Need.

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