



English Channel Airspace Requirements – (ACP 2021 088)

Stakeholder Engagement Letter – Design Principles (Stage 1B)
June 2022

1. Requirement

This document details a proposed permanent change to airspace in the vicinity of The English Channel. This change is required to support the ongoing operation of Unmanned Aircraft Systems (UAS) operated by Bristow Helicopters Limited on behalf of the Maritime and Coastguard Agency and HM Coastguard. Bristow currently operate the Schiebel S-100 Camcopter from Lydd London Ashford Airport into the current temporary danger area complex (AIC 011/2022) to respond to taskings as issued by the Aeronautical Rescue Coordination Centre (ARCC). Due to the enduring nature of this requirement and the proposed expiry date of the current temporary danger area (TDA), a viable solution to replace the current TDA complex is needed to continue to support the UK's response to current and future levels of small boat crossing activity in the region. It is expected that as well as supporting HM Coastguard UAS operations, the final airspace solution will take into consideration the requirements of all other operators and will be designed and managed in such a way as to deliver a solution that supports the wider UK response in the region.

2. Purpose

In 2018, the Civil Aviation Authority (CAA) published a new process (CAP1616), that requires any changes to airspace to pass through seven stages. Change sponsors must involve stakeholders at specified stages of the CAP1616 process to ensure the process is transparent. In January 2021, Bristow Helicopters Ltd and the Maritime and Coastguard Agency completed the first step of the process (Step1A), by submitting our Statement of Need to the CAA defining the reasoning behind our application. The CAA confirmed that it was appropriate and provisionally assessed our proposal as a level 1 change. This means the full CAP1616 process applies. To make the details of all changes available to everyone, the CAA have created a dedicated website (airspacechange.caa.co.uk/about-airspace-changes) where you can see all airspace change proposals currently being developed. Our Statement of Need and full details of CAP1616 are also on this website.

This document sets out our approach to the next part of the airspace-change process (Step 1B). Step1B is the second part of the 'Define' stage of CAP1616. It considers the general principles we should follow when we eventually design the airspace structure. The design principles are general considerations, not detailed proposals. The feedback we get during Step 1B will give us a good understanding of what is important to stakeholders and will guide and shape our design principles. While discussions at this stage relate only to the design principles, further discussions, including a formal consultation, will be carried out later in the process.

We are currently in the first stage of this process, Define. At this Step1B we are asking stakeholders (the people and organisations who can affect, or be affected by, any change to airspace) to give us their views, while we consider the principles we should follow when designing any change to airspace. In this document there is a series of questions. Your answers to these will help us understand what principles are most important to you. Your feedback will help to guide the decisions we make as we move further through the CAP1616 process to the design stages and help us shape changes that have the potential to provide the most significant benefits.

Our part in this co-ordinated approach will relate to unmanned aircraft flying below 7,000 feet. Throughout this document, we will tell you how you can get involved and find out more about the process. We hope you find this document useful and look forward to hearing your views.

3. Timeline

As agreed with the CAA the below represents our agreed airspace change proposal timeline.

	CURRENT DOCUMENT SUBMISSION DEADLINE	CURRENT GATEWAY DATE	PROPOSED DOCUMENT SUBMISSION DEADLINE	PROPOSED GATEWAY DATE
DEFINE Gateway ¹	04-Apr-22	29-Apr-22	08-Jul-22	29-Jul-22
DEVELOP & ASSESS Gateway ¹	18-Jul-22	29-Jul-22	07-Oct-22	28-Oct-22
CONSULT Gateway	14-Oct-22	28-Oct-22	06-Jan-23	27-Jan-23
Formal ACP Submission		24-Mar-23		26-Jun-23
DECIDE Gateway		28-Jul-23		27-Oct-23
Target AIRAC		10/2023		02/2024

4. Duration of the proposed change

In line with regional incident statistics (Section 9) and predicted levels of continued small boat crossings of The English Channel, it is foreseen that a long lasting UAS capability will continue to be required to cover the period from the expiry of the current TDA complex until the 1st of March 2027.

5. Stakeholder engagement

Over the past couple of months Bristow has identified the key stakeholders to be consulted as part of this process which have been included within Annex B. To make sure we gather a representative range of views, we are directly contacting specific stakeholders to inform them of the process to enable us to gather a wide range of views during Step 1B. This document and more information on this application is published on the CAA airspace change portal. (airspacechange.caa.co.uk).

6. How the information will be used

We are asking all those taking part to consider and comment on the 10 proposed design principles listed in Annex A. These proposed design principles, explore a range of considerations we believe need to be taken into account.

You will also be able to suggest other design principles you think should be considered. If you would like to give us your views, you can do so by completing the matrix in Annex A and returning it to airspacechangeproposal@bristowgroup.com. You can also see up-to-date information on the process at airspacechange.caa.co.uk

7. Next Steps

Up until 26th of June 2022 we will be gathering your views on what our design principles should be. This information will then help us produce a set of draft design principles before sending our proposals to the CAA along with an explanation of how we took the views of stakeholders into account. We expect the CAA to review our proposals at the next gateway assessment on the 29th of July 2022. If the CAA are satisfied with the design principles we will be able to proceed to the next stage of the CAP1616 process 'Develop and Assess' and begin developing specific designs for the airspace. We do not currently have any specific proposals for how airspace in the vicinity of The English Channel may change. The purpose of this Step 1B is to develop a set of principles that will form the basis of the more detailed work that will follow, and which we will formally consult stakeholders on.

8. Operational Aim – English Channel

Bristow Helicopters Limited have been requested by the Maritime and Coastguard Agency to submit an Airspace Change Proposal to facilitate long-term UAS Beyond Visual Line Of Sight (BVLOS) operations in the vicinity of the English Channel. Routine HM Coastguard patrols are required to support Search and Rescue taskings in the region as a result of the increasing demand on emergency services responding to migrant crossings.

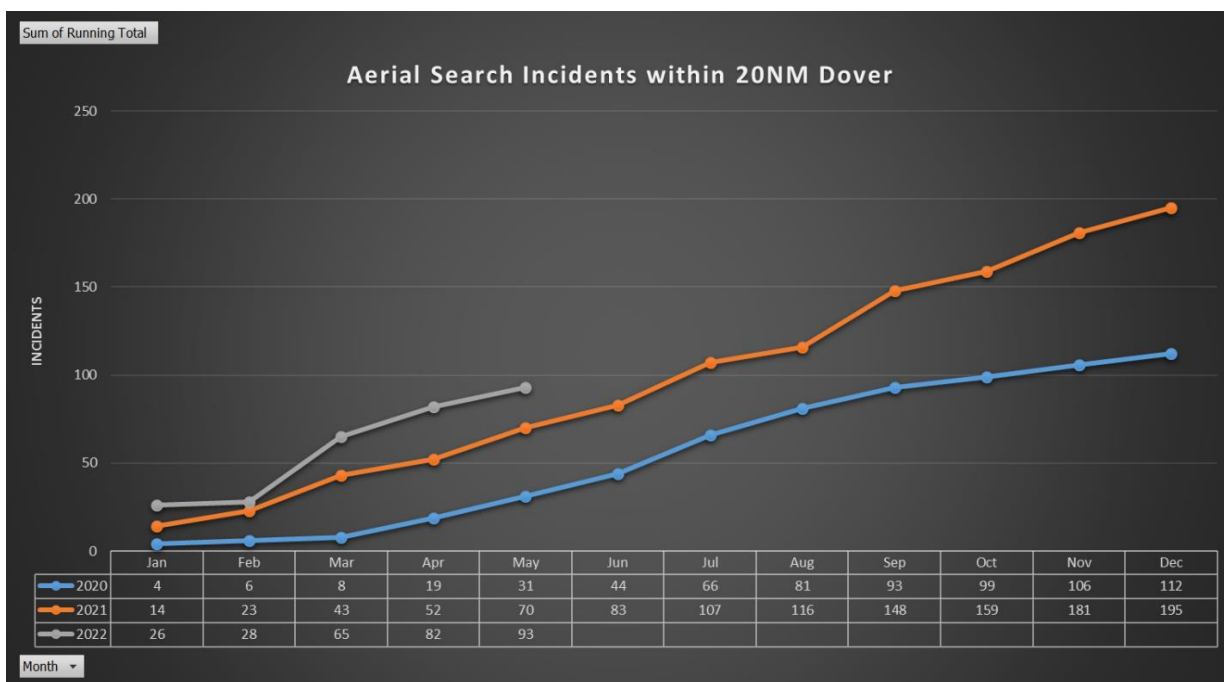
As part of UK Governments response, The Department for Transport (DfT) has been requested to expand routine situational awareness (SA) patrols of the English Channel due to the increased levels of migrant crossings which regularly result in Search and Rescue operations following multiple '999' calls. Based on the intelligence from the UAS, Her Majesty's Coastguard (HMCG) decision makers can ascertain the scale and accurate location of an incident and mobilise the appropriate rescue assets to attend.

HM Coastguard has been working closely with local authorities and emergency services to utilise resources effectively to cope with the current and predicted increase in regional SAR Incidents. Deploying UAS for situational awareness patrols and safety overwatch in the English Channel provides operational staff at HM Coastguard with vital intelligence which can be shared with other emergency services, UK Gov departments and local organisations, ensuring effective deployment of air, sea and ground resources. As a consequence, opportunity may be provided to hold the UK SAR helicopter (SAR(H) assets in reserve to conduct their primary life-saving role reducing pressure on the service and crews.

Due to the enduring nature of this requirement and in line with UK regulatory policy for temporary danger areas (TDA), a permanent solution to replace the current English Channel TDA complex is needed to continue to support the UK Government's response to the current and forecasted levels of small boats attempting to cross The English Channel. It is expected that as well as supporting MCA UAS operations, the final airspace solution will consider the requirements of all parties and will be designed and managed in such a way as to provide opportunity to support the wider UK, multi-agency response in the region. If in the future the requirement no longer exists or a technical advancement negates the need for the airspace change, it will be relinquished.

This essential State requirement will be addressed by Bristow Helicopters Limited (BHL) utilising unmanned aircraft systems (UAS) deployed from Lydd London Ashford Airport in Kent.

9. HM Coastguard Historic Incident Data – English Channel



The above chart shows the number of HM Coastguard incidents within 20nm of Dover across 2020, 2021 and 2022 so far.

- i. The blue line shows the number of HM Coastguard incidents beginning to increase from March 2020 with a significant surge from April 2020 onwards. This correlates directly with the increase in attempted small boat crossings of The English Channel.
- ii. The orange line shows data for 2021, clearly showing a large increase on 2020. This trend continues sharply from February 2021 onwards. This increase is being driven by a surge in attempted small boat crossings.
- iii. 2022 again shows a significant increase in incident rate over the previous two years. The trend is expected to be maintained across the rest of the year with crossing rates predicted to endure for the foreseeable future.

10. Unmanned Aircraft System (UAS) deployed.

Bristow Helicopters Ltd hold a 'Specific' category UAS Operation Authorisation to operate the Schiebel S-100 Camcopter beyond visual line of sight (BVLOS) from Lydd London Ashford Airport on behalf of HM Coastguard. Complex UAS operations are routinely conducted over the English Channel alongside both manned and other unmanned aircraft in the current TDA complex. The UAS also safely integrates with normal Lydd Airport traffic. The aircraft has been operating in the region on behalf of the MCA and HM Coastguard Dover since March 2022 and is tasked by the Aeronautical Rescue Coordination Centre in Fareham in the same manner as manned SAR helicopter assets.



'Coastguard50' HMCG S-100 Camcopter deployed at Lydd Airport in support of HM Coastguard operations.

The Schiebel S-100 Camcopter is a sub 200kg UAS employed by military and civilian organisations alike with some 400+ units operating worldwide. It has accrued in excess of 80,000 flying hours worldwide.

The aircraft can operate for up to 6 hours during both day and night under adverse weather conditions. The UAS is able to operate across the entirety of the current TDA complex.

Electronic conspicuity is provided by a dedicated transponder module consisting of a Mode S/ADS-B out transponder. The UAS ground station is also equipped with a VHF radio to allow UAS crews, air traffic control agencies and other manned aircraft to communicate directly on the appropriate channel. Live payload feeds from these on-board sensor suites are exported securely to HM Coastguard command centres to provide real time situational awareness to incident commanders.

11. Annex A

Stage 1B Proposed Design Principles (please complete and return to airspacechangeproposal@bristowgroup.com Please use remaining table fields to add further principles you feel we should consider).

Proposed Design Principle	Agree	Disagree
1. Must comply with UAS regulatory framework.		
2. Must consider the requirements of all potential users.		
3. Must be safe for use by all airspace users.		
4. Minimise impact on other airspace users.		
5. Airspace must not constrain the host airport operation.		
6. Must use the minimum area and altitude required to conduct effective operations.		
7. Avoid overflight of congested areas.		
8. Main operating area to be located over the sea.		
9. Minimise the noise and environmental impact on areas affected by the proposed change.		
10. Assess all airspace options available to deploy UAS BVLOS.		

12. Annex B

Stakeholders

NATMAC

- Airspace4All
- Airport Operators Association (AOA)
- Airfield Operators Group (AOG)
- Aircraft Owners and Pilots Association (AOPA)
- Airspace Change Organising Group (ACOG)
- Association of Remotely Piloted Aircraft Systems UK (ARPAS-UK)
- Aviation Environment Federation (AEF)
- British Airways (BA)
- BAe Systems
- British Airline Pilots Association (BALPA)
- British Balloon and Airship Club
- British Business and General Aviation Association (BBGA)
- British Gliding Association (BGA)
- British Helicopter Association (BHA)
- British Hang Gliding and Paragliding Association (BHPA)
- British Microlight Aircraft Association (BMAA)
- British Model Flying Association (BMFA)
- British Skydiving
- Drone Major
- General Aviation Alliance (GAA)
- Guild of Air Traffic Control Officers (GATCO)
- Honourable Company of Air Pilots (HCAP)
- Helicopter Club of Great Britain (HCGB)
- Heavy Airlines
- Iprosurv
- Isle of Man CAA
- Light Aircraft Association (LAA)
- Low Fare Airlines
- Military Aviation Authority (MAA)
- Ministry of Defence - Defence Airspace and Air Traffic Management (MoD DAATM)
- NATS
- Navy Command HQ
- PPL/IR (Europe)
- UK Airprox Board (UKAB)
- UK Flight Safety Committee (UKFSC)
- United States Air Force Europe (3rd Air Force-Directorate of Flying (USAFE (3rd AF-DOF))

Specific Aviation

- Bristow Helicopters Limited
- Maritime and Coastguard Agency
- HM Coastguard (Dover)
- Home Office
- Lydd Airport
- 2excel Aviation
- Tekever
- Royal Navy (Wildcat)
- RVL Group
- Fotoflight
- Lydd Ranges
- Hythe Ranges
- Dungeness Power Station (RA)

Local Aviation Stakeholders

- Lashenden/Headcorn Aerodrome
- Manston International Airport
- Waldershare Gliders
- Harringe Airstrip (Kent Microlight Club)
- Pent Farm
- Witherenden
- Swanborough farmstrip
- Deanland Airfield
- Shoreham/Brighton City Airport
- London Heathrow
- London Luton
- London Gatwick Airport
- Redhill aerodrome
- London Southend airport
- Hamilton Farm (minor afd)
- Woodchurch / Little Engeham Farm(minor Afd)
- Tiffenden (minor Afd)
- Coldharbour Farm (Kent Microlight Club)
- Spilsted Farm
- Rochester Airport
- Biggin Hill Airport
- Fair Oaks Airport
- Chichester/Goodwood
- Blackbushe

Local Authorities

- Kent County Council
- MP Folkestone and Hythe

Bristow Helicopters Ltd
airspacechangeproposal@bristowgroup.com