

Bristow Helicopters Limited

ACP 088-2021 – Stage 1B

Design Principles.

14 July 2022



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Introduction

- 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.
- 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.

Introduction

- In 2018, the Civil Aviation Authority (CAA) published a new process (CAP1616), that requires any changes to airspace to pass through seven stages.
- 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.

Engagement Approach

- At this Step1B we:
 - Identified stakeholders the people and organisations who can affect, or be affected by, any change to airspace. Annex A
 - Developed ten proposed design principles (slide 7).
 - Asked our stakeholders to give us their views on the ten proposed design principles to be used when developing airspace options.
 - Consulted with stakeholders on the proposed design principles.
 - This information was analysed and used to produce the draft design principles (slide 17), which was shared with the stakeholders, and their views requested.
 - The feedback was analysed and used to develop the design principles (slide 53) for submission to the CAA for review and approval.

Engagement Timeline

- Stakeholder Identification 29 Nov – 1 Jun 22. Annex A.
- Some limited stakeholder engagement took place prior to ACP submission and development of statement of need (28 Jan 22), as part of the migrant response delivered on behalf of the Maritime & Coast Guard Agency using TDA (1 Jan – Present).
- Initial letter including proposed design principles sent via email sent 8th Jun 22.
- Consultation period 8th – 26th Jun 22, However feedback was considered, and amendments included until the 7th Jul 22.
 - Feedback considered and analysed as received. (slides 13-16).
- Draft design principles sent to stakeholders 7th Jul 22 (slide 17).
- Email sent to stakeholders requesting any follow up comments.
- Feedback considered and analysed as and when received. (slides 48-52).
- Design principles further developed (slide 54).
- Design principles sent to CAA for review / approval stakeholders on 15th Jul 22.

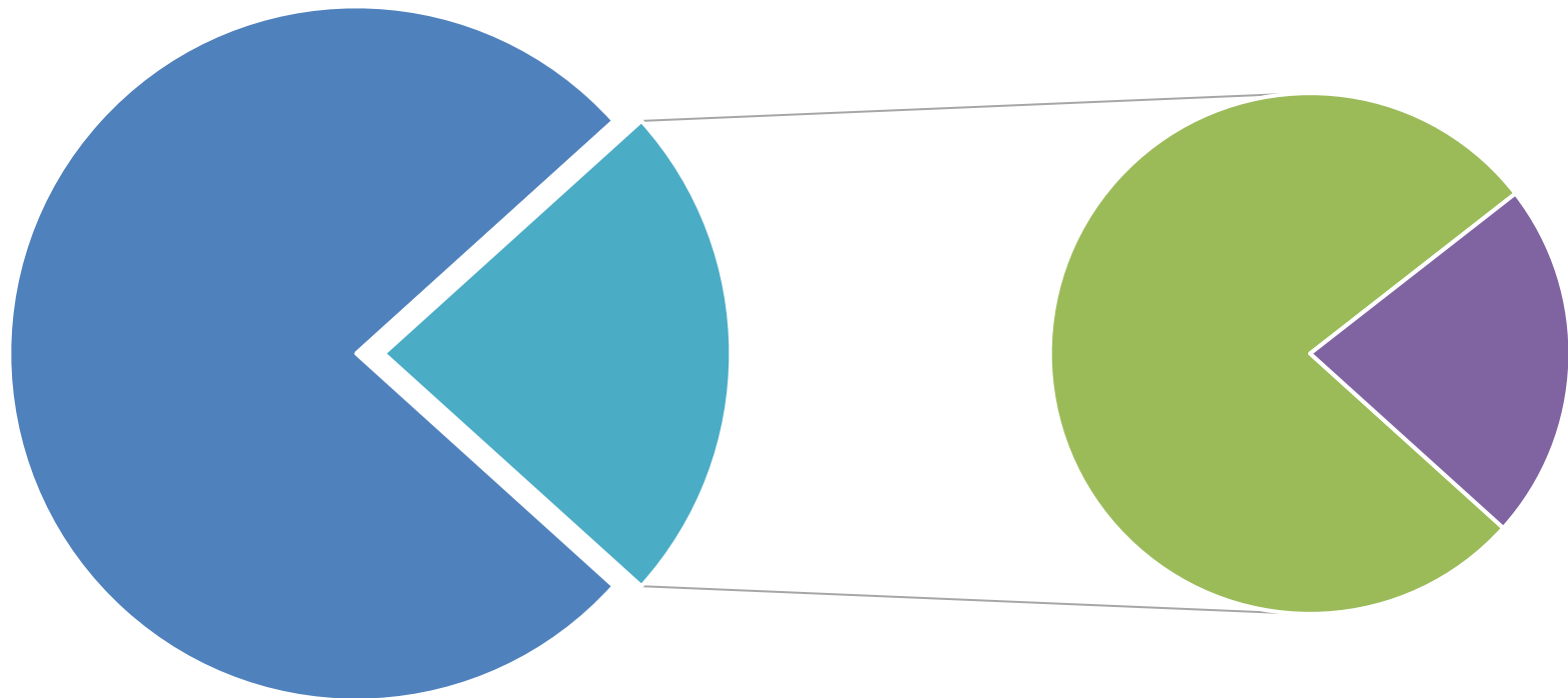
Proposed Design Principles

- The following design principles were proposed to stakeholders, in a letter sent out on the 8th of Jun 22:

Item	Proposed Design Principles
1	Must comply with UAS regulatory framework.
2	Must consider the requirements of all potential users.
3	Must be safe for use by Click to add text
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.

Proposed Design Principles: Initial Stakeholder Responses – 8 Jun to 7 Jul 22.

Stakeholder Feedback



■ No Response Received ■ Agreed with Design Principles ■ Suggested Amendments to Design Principles

Stakeholder (BHA - 03548) Feedback: Proposed Design Principles.

1. Design Principle 3. 'Surely it would be better to say maintain or enhance the current level of safety as most ACPs do.'

Stakeholder (00001) Feedback: Proposed Design Principles.

In response to your email, essential design principles:

1. Provide SAR to airmen crossing the channel.
2. All aircraft types must be included.
3. Airspace must allow access to even non radio aircraft.
4. Operation to comply with the Secretary of State for Transport's objectives.
5. Comply with successful BVLOS trials already carried out at Thorney Island.
6. Comply with Visual observer trials previously authorised by the CAA.
7. Safety case to be presented before the next stage.
8. Evidence based reasoned argument to be presented for the need of a TDA.

No opinion/response to design principles as proposed in the stakeholder document.

Stakeholder (SaxonAir - 89890) Feedback: Proposed Design Principles.

1. 'Consideration for commercial rotary wing operations when icing may prohibit IFR transit above 1,500ft', the current upper limit to the TDA EG 098 complex.

Stakeholder (BMAA - 25256) Feedback: Proposed Design Principles.

Additional Design Principles:

1. Employ Flexible Use Airspace principles. I.E. deactivate when not required.
2. Deactivate the DA if requirement ceases to exist.
3. Provide a DAAIS and DACS permanently. Easy enough to do via Lydd ATC.

Stakeholder Feedback Analysis

Proposed Design Principle	Proposed Design Principles	No. Stakeholders in Agreement with design principles	Stakeholder Responses	Draft Design Principles (Stakeholder responses incorporated in green).	Draft Design Principles Rational
1	Must comply with UAS regulatory framework.	14		Must comply with UAS regulatory framework.	
2	Must consider the requirements of all potential users.	14	<p>Stakeholder 89890 response: Consideration for commercial rotary wing operations when icing may prohibit IFR transit above 1,500ft, the current upper limit to the TDA EG 098 complex.</p> <p>Stakeholder 00001 response: All aircraft types must be included.</p> <p>Stakeholder 00001 response: Airspace must allow access to even non radio aircraft.</p>	Must consider the requirements of all potential users, including for rotary wing operations when icing may prohibit IFR transit above 1,500ft.	<p>Proposed Design Principle amended to include 'including for rotary wing operations when icing may prohibit IFR transit above 1,500ft' as suggested by stakeholder 89890.</p> <p>Stakeholder 00001, responses is covered under this proposed design principle</p>
3	Must be safe for use by all airspace users.	14	Stakeholder 03548 response: Surely it would be better to say maintain or enhance the current level of safety as most ACPs do.	Maintain the current level of safety for use by all airspace users.	Proposed Design Principle amended to include 'maintain current level of safety' as suggested by stakeholder 03548
4	Minimise impact on other airspace users.	14	Stakeholder 89890 response: Employ Flexible Use Airspace principles. I.E. deactivate when not required.	Minimise impact on other airspace users, such as utilising the flexible use of airspace principles.	Proposed Design Principle amended to include 'such as utilising the flexible use of airspace principles.' as suggested by stakeholder 25256
5	Airspace must not constrain the host airport operation.	14		Airspace must not constrain the host airport operation.	
6	Must use the minimum area and altitude required to conduct effective operations.	14		Must use the minimum area and altitude required to conduct effective operations.	

Stakeholder Feedback Analysis...

Proposed Design Principle	Proposed Design Principles	No. Stakeholders in Agreement with design principles	Stakeholder Responses	Draft Design Principles (Stakeholder responses incorporated in green).	Draft Design Principles Rational
7	Avoid overflight of congested areas.	14		Avoid overflight of congested areas.	
8	Main operating area to be located over the sea.	14		Main operating area to be located over the sea.	
9	Minimise the noise and environmental impact on areas affected by the proposed change.	14		Minimise the noise and environmental impact on areas affected by the proposed change.	
10	Assess all airspace options available to deploy UAS BVLOS.	14		Assess all airspace options available to deploy UAS BVLOS.	
N/A	Stakeholder suggested design principle that is not aligned to the proposed design principles.		Stakeholder 89890 response: Deactivate the DA if requirement ceases to exist.	Should the airspace no longer be required for UAS operations, it should be relinquished.	Proposed Design Principle amended to include 'Should the airspace no longer be required for UAS operations, it should be relinquished.' which is the essence of stakeholder 25256 response into draft design principles.
N/A	Stakeholder suggested design principle that is not aligned to the proposed design principles.		Stakeholder 89890 response: Provide a DAAIS and DACS permanently. Easy enough to do via Lydd ATC.	Not included	As the airspace design options have not been undertaken (these relate to Danger Areas), it is not known whether a DAAIS or DACS would be appropriate. Further by including this as a design principle it pushes the design options towards Danger Areas. This has not been included for these reasons.

Stakeholder Feedback Analysis...

Proposed Design Principle	Proposed Design Principles	No. Stakeholders in Agreement with design principles	Stakeholder Responses	Draft Design Principles (Stakeholder responses incorporated in green).	Draft Design Principles Rational
N/A	Stakeholder suggested design principle that is not aligned to the proposed design principles.		Stakeholder 00001 response: Provide SAR to airmen crossing the channel.	Not included	Stakeholder provided no comment on proposed design principles. The response proposed by the stakeholder forms part of a commercial service provided by BHL contracted by the MCGA and not Airspace Design Principles, it has been excluded on this basis.
N/A	Stakeholder suggested design principle that is not aligned to the proposed design principles.		Stakeholder 00001 response: Operation to comply with the Secretary of State for Transport's objectives.	Not included	Stakeholder provided no comment on proposed design principles. The response proposed by the stakeholder forms part of a commercial service provided by BHL contracted by the MCGA and not Airspace Design Principles, it has been excluded on this basis.
N/A	Stakeholder suggested design principle that is not aligned to the proposed design principles.		Stakeholder 00001 response: Comply with successful BVLOS trials already carried out at Thorney Island.	Not included	Stakeholder provided no comment on proposed design principles. The response proposed by the stakeholder forms part of the Operating Safety Case submitted to the CAA and UAS Operational Authorisation issued by the CAA. It has been excluded on these grounds.

Stakeholder Feedback Analysis...

Proposed Design Principle	Proposed Design Principles	No. Stakeholders in Agreement with design principles	Stakeholder Responses	Draft Design Principles (Stakeholder responses incorporated in green).	Draft Design Principles Rational
N/A	Stakeholder suggested design principle that is not aligned to the proposed design principles.		Stakeholder 00001 response: Comply with Visual observer trials previously authorised by the CAA.	Not included	Stakeholder provided no comment on proposed design principles. The response proposed by the stakeholder forms part of the Operating Safety Case submitted to the CAA and UAS Operational Authorisation issued by the CAA. It has been excluded on these grounds.
N/A	Stakeholder suggested design principle that is not aligned to the proposed design principles.		Stakeholder 00001 response: Safety case to be presented before the next stage.	Not included	Stakeholder provided no comment on proposed design principles. The response proposed by the stakeholder forms part of the Operating Safety Case submitted to the CAA and UAS Operational Authorisation issued by the CAA. It has been excluded on these grounds.
N/A	Stakeholder suggested design principle that is not aligned to the proposed design principles.		Stakeholder 00001 response: Evidence based reasoned argument to be presented for the need of a TDA.	Not included	As the airspace design options have not been undertaken , it is not known whether a Temporary Danger Area would be appropriate. Further by including this as a design principle it pushes the design options towards Danger Areas. This not been included for these reasons.

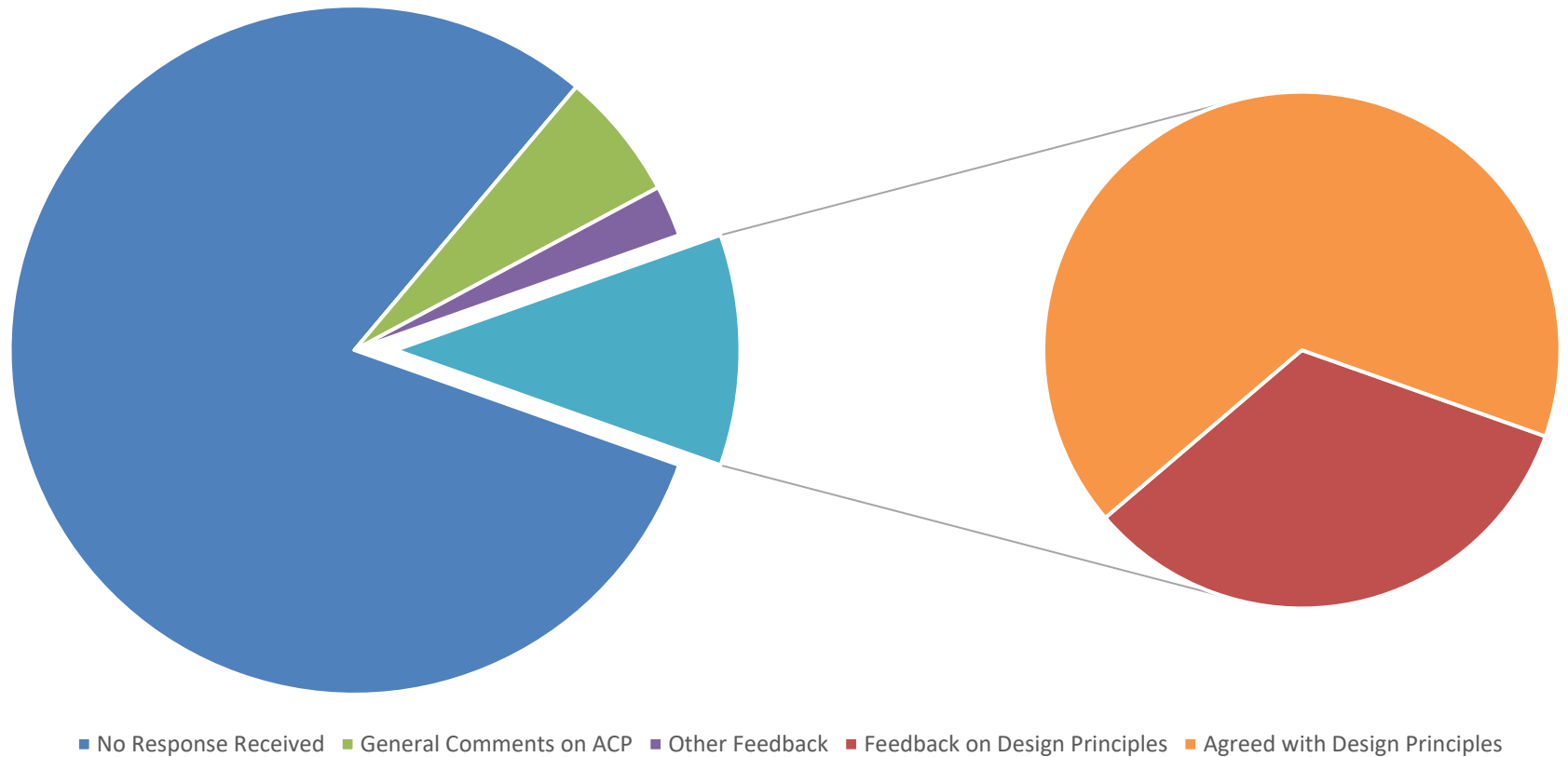
Draft Design Principles (stakeholder feedback)

- Feedback from stakeholders was used on determine the draft design principles below (amendments in green):

Item	Draft Design Principles
1	Must comply with UAS regulatory framework.
2	Must consider the requirements of all potential users, including for rotary wing operations when icing may prohibit IFR transit above 1,500ft.
3	Maintain or enhance the current level of safety for use by all airspace users.
4	Minimise impact on other airspace users, such as utilising the flexible use of airspace principles.
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.
11	Should the airspace change no longer be required for UAS operations, it should be relinquished.

Stakeholder Responses to draft design principles – 7 Jul.

Stakeholder Feedback



Stakeholder (00001) Responses – Draft Design Principles

Thank you for a copy of your revised design principals.

Thank you for including my response in one of your slides.

Your revisions could be interpreted to be in line with my response. We will need to refer back to my response if the interpretation diverges.

I fully endorsed all drone/RPAS operations BVLOS where they integrate into existing class G airspace.

BHL Response (00001) – Draft Design Principles

Evening,

Thanks for your comments. As per our design principle 10 - 'Assess all airspace options available to deploy UAS BVLOS' Bristow are very interested in exploring alternative airspace options and challenging the requirement for segregated airspace as the only viable option for BVLOS operation UAS. If this is written into the design principles it may limit our ability to design and develop alternative solutions that may provide these options. The next step - Stage 2 'design and assess' will capture these potential options for consultation with our stakeholders. It's not Bristow's intention to limit access to airspace. No solution has yet been consulted on as this comes in Stage 2 of the CAP 1616 process. I hope this allays any concerns you may have and we look forward to developing these potential options for regulator consideration.

Kind Regards,

Stakeholder (00001) Responses – Draft Design Principles

OBJECTION

The CAA have a prime responsibility for the safety of all air users.

Exercise 18 of the PPL syllabus includes an exercise in flying in poor weather at low level. A pilot who, for whatever reason, finds themselves over the sea VFR at 500ft, obeying rule 5, being clear of persons, property and vessels is legal but has no protection from controlled airspace. The aircraft can be flown legally at 500ft, and possibly below. There is no obligation to carry either a Radio or Transponder, and at 500 ft VHF line of sight is not viable

The establishment of a permanent controlled airspace across a wide swathe of the English Channel presents a safety hazard to all airmen. An airman approaching such a barrier in unexpected marginal conditions will be flying under pressure, may not be able to turn back and has had the one safe route to land removed.

A RPAS that is certified BVLOS would not require controlled airspace and the safety of other air users would not be compromised.

I object to this ACP on the ground that it is unsafe for other air users.

I consent to this being published and insist that this contribution influences this airspace change in accordance with CAP1616.

Stakeholder (35435) Responses – Draft Design Principles

Good afternoon,

As a pilot that operates in East Kent I have just been informed of your ACP 2021 088. This threatens operations into and out of the airfields in the area that I use.

Whilst I understand the requirement to implement an area over sea so your drones can detect migrants, I do not understand why it is necessary to set up an area that blithely cuts off a section of Kent and grounds all movements from those airfields contained within that area.

Can you explain your rationale for this? Your design principles document states that you integrate successfully with Lydd Airport traffic into the Channel so why would you need to sterilise a significant ground area of Kent? This seems to be an overly zealous airspace grab which will stop the activities of a great deal of people whilst the area would largely be unused for a majority of the time.

I'm hopeful that you've made a mistake in defining the area that covers the east of Kent as every other part of the defined area is over water. If not you have failed to satisfy 7 of the design principles that are laid out in Stage 1b design principles, those being items 2, 3, 4, 6, 7, 8 & 10

- 2. Must consider the requirements of all potential users - fail
- 3. Must be safe for use by all airspace users - fail
- 4. Minimise impact on other airspace users - fail
- 6. Must use the minimum area and altitude required to conduct effective operations - fail
- 7. Avoid overflight of congested areas - fail
- 8. Main operating area to be located over the sea - fail
- 10. Assess all airspace options available to deploy UAS BVLOS - fail

I do not think it's justified nor fair to those it affects and you have failed to reach out to the aviation community in the area most of whom were totally unaware until today of the proposed ACP, lucky I found out...

I would appreciate a response to this email but in the meantime please add me to the stakeholder list for consultation.

Regards

BHL Response (35435) – Draft Design Principles

Good evening,

Thanks for your comments. The image shared in the initial application is only intended as a very rough guide to the area potentially affected by the change. It in no way represents any proposed design solution, these will come later in Stage 2. As per our design principle 8, the main operating area to be located over the sea. There is no intention to operate over land. The only over land section will be an access route into Lydd airport. I hope this allays any concerns you may have.

Kind Regards,

Stakeholder (35435) Responses – Draft Design Principles

Thank you for your response, that's reassuring.

It's a shame that this graphic was included in the ACP proposal as it quite rightly raised concerns with many pilots and operators in the area. Could a revised graphic be issued which portrays the Danger area being located at sea from Folkestone to Ramsgate and not over the land. That will allay our fears and you'll have a quieter life during the ACP process.

I'll look forward to seeing the draft design proposal when it's available.

Kind Regards

BHL Response (35435) – Draft Design Principles

Hi ,

Thanks for the feedback, revised graphic uploaded. We look forward to working with you moving forward.

Kind Regards,

Stakeholder (BHA - 03548) Responses – Draft Design Principles

No Comments

Best Regards,

Stakeholder (BMAA - 25256) Responses – Draft Design Principles

Good afternoon,

Thank you for sending this information.

I note that on page 11 of your Draft Design Principles you have listed my additional suggested Design Principles. I also note that in your Draft Design Principles, on page 12, you have included my points 1 and 2. Thank you for that. However, I am extremely concerned that you have not incorporated my point 3; that of providing a DAAIS and DACS.

It is interesting that for the current TDAs that you are using in the English Channel a DAAIS is provided, by either London Information or Lydd ATC (but not a DACS).

I am interested to know why this point is not a Design Principle for this ACP?

Considering you have excluded this point from the Draft Design Principles leads the BMAA to state that we object to, and do not agree with, your current Draft Design Principles.

I also note that, currently, there is no information on the volume(s) of airspace proposed for this ACP, by yourselves, even though there is a schematic on the CAA ACP portal of the potentially impacted area. In my experience those are often inaccurate and misleading. I note your comment on page 13 of the Draft Design Principles so can you confirm that proposed volume(s) will be advised at your Design Options stage? Currently there is great concern within the GA community over potential airspace volume(s) for this new ACP so some information would be appreciated.

Best regards

BHL Response (BMAA - 25256) – Draft Design Principles

Evening ,

Thanks for your comments. A DAAIS and or DACS suggests Bristow are only considering airspace segregation in the form of a danger area. As per our design principle 10 - 'Assess all airspace options available to deploy UAS BVLOS' Bristow are very interested in exploring alternative airspace options and challenging the requirement for segregated airspace as the only viable option for BVLOS operation of HM Coastguard UAS. If this is written into the design principles it may limit our ability to design and develop alternative solutions that may provide these options. The next step - Stage 2 'design and assess' will capture these options for consultation with our stakeholders. Its not Bristow's intention to limit access to airspace . The image shared in the initial application is only intended as a very rough guide to the area potentially affected by the change. It in no way represents any proposed design solution , these will come later in Stage 2. As per our design principle 8 , the main operating area to be located over the sea. There is no intention to operate over land. The only over land section will be an access route into Lydd airport. I hope this allays any concerns you may have.

Kind Regards,

Stakeholder (BMAA - 25256) Responses – Draft Design Principles

Hi ,

Many thanks for your reply. I will pass this on to our members and suggest that any other aviation stakeholders you have or receive contact details for are also informed of this as there is much concern within the GA community.

I think it would also be useful to set up a meeting with the local GA community during Stage 2 so that you can incorporate feedback gained into your design policies. I am happy to help facilitate that, if you wish.

Best regards

BHL Response (BMAA - 25256) – Draft Design Principles

Good Morning ,

Thank you for your offer to help facilitate a meeting with the local GA community as part of Stage 2. We would be grateful for any assistance and if acceptable we will get back in contact with you as we start to plan Stage 2 engagement in the coming weeks?

Best Regards,

Stakeholder (Brighton City Airport - 93939) Responses – Draft Design Principles

Good afternoon,

Thank you for inviting us to comment on the 'design principles' you intend to submit to the CAA. We do not have anything to add to the proposal at this stage. We look forward to receiving engagement on subsequent phases.

One small administrative point for correction please. The correct address for correspondence is 'reception@flybrighton.com'. You addressed the email to eception@flybrighton.com (your omitted the 'r' from reception).

Thank you

Reception Team

BHL Response (Brighton City Airport - 93939) – Draft Design Principles

Good Morning,

Thank you for your feedback, our apologies for the error in the email address, this has now been corrected.

Best Regards,

Stakeholder (Kent Microlight Club - 58503) Responses – Draft Design Principles

Yes, I do.

On page 12, you have your draft design principles after stakeholder feedback.

On page 11, you have responses from Stakeholder (25256). Two of these principles have made into your draft design principles after stakeholder feedback, one has not.

It seems somewhat remiss of you to have excluded:

3. Provide a DAAIS and DACS permanently. Easy enough to do via Lydd ATC.

from the draft design principles after stakeholder feedback.

BHL Response (Kent Microlight Club - 58503) – Draft Design Principles

Good Evening ,

Thanks for your comments. A DAAIS and or DACS suggests Bristow are only considering airspace segregation in the form of a danger area. As per our design principle 10 - 'Assess all airspace options available to deploy UAS BVLOS' Bristow are very interested in exploring alternative airspace options and challenging the requirement for segregated airspace as the only viable option for BVLOS operation of UAS. If this is written into the design principles it may limit our ability to design and develop alternative solutions that may provide these options. The next step - Stage 2 'design and assess' will capture these options for consultation with our stakeholders. It's not Bristow's intention to limit access to airspace . I hope this allays any concerns you may have and explains why we didn't want to limit the potential to try and develop more inclusive airspace options.

Stakeholder (DAATM - 39283) Responses – Draft Design Principles

Good morning,

MOD has no follow-on comments regarding the design principles.

Best regards,

Stakeholder (Royal Navy HQ - 45375) Responses – Draft Design Principles

Hello,

I feed any comments back for the Royal Navy in through DAATM for a coordinated MoD response.
Thank you for keeping me updated though as you progress.

Kind regards,

Stakeholder (NATS - 56886) Responses – Draft Design Principles

Good Afternoon,

Thank you for your emails and further detail provided on the design principles which all make perfect sense. We do not have any further comments at this stage. We look forward to seeing detail concerning proposed airspace designs.

Many Thanks,

Stakeholder (68663) Responses – Draft Design Principles

Good afternoon,

I write in response to the ACP-2021-088 document which proposes a permanent change to airspace along the Southeast coastline.

I note it makes reference to stakeholders being asked to give their views on how this proposal would affect them. My father and I own and operate aircraft from a privately owned farm strip which will be affected by this proposal and therefore as stakeholders, we should be consulted on this plan.

Can you give us an explanation as to why the proposed line cuts across from Folkestone to Sandwich rather than separates land and sea as it does Southwest of Folkestone? As mentioned, our privately owned strip among numerous other privately owned strips, fall within this proposed zone and therefore the effects of this proposal going ahead would be catastrophic to us all.

Look forward to hearing from you.

BHL Response (68663) – Draft Design Principles

Good evening,

The image shared in the initial application is only intended as a very rough guide to the area potentially affected by the change. It in no way represents any proposed design solution, these will come later in Stage 2. As per our design principle 8 – ‘the main operating area to be located over the sea’ There is no intention to operate over land. The only over land section will be an access route into Lydd airport. I hope this allays any concerns you may have.

Kind Regards,

Stakeholder (68663) Responses – Draft Design Principles

Good morning,

Many thanks for your quick response and yes, that does help allay our fears. You may well have had many other emails of similar nature to mine recently as I know there are a number of concerned parties regarding this proposal.

Moving forwards, it would be good for our farm strip and all the other local farm strips affected by this initial graphic to be added to the stakeholders list, so we can be included/notified of any changes. Can you confirm if there is a mechanism to allow for this please?

Many thanks

BHL Response (68663) – Draft Design Principles

Morning,

Absolutely, we welcome this input. We would be very grateful for a list of local farm strips and their contacts to support this if possible? We did include the one's we could find contact details for in our initial reach out but if you feel we have missed some please let us know and we'd be delighted to include them in the process moving forward. As an aside we have also updated the graphic on the airspace portal to address these concerns from the local GA community.

Stakeholder (Dover and Folkestone Hang Gliding Club - 88898) Responses – Draft Design Principles

Dear Sir,

Regarding: ACP-2021-088 - English Channel SAR Operations

I am on the committee of the Dover and Folkestone Hang Gliding Club. We fly hang gliders and paragliders from the cliffs between Dover and Folkestone (since about 1977). This generally consists of flying along the cliffs or a little way out over the sea, or gliding cross country inland from the coast. Please note that the cliffs are our flying site (effectively our 'airport'), and not merely a possible choice of route (unlike for powered aircraft based elsewhere in Kent or further afield).

We believe that we could be impacted by the current area indicated by your airspace change proposal - based on the initial map showing a border line over land from Folkestone to Ramsgate.

We would like to be added to the list of stakeholders, kept informed, and be able to respond and influence the proposal. We are surprised that you have not included us in the original list of stakeholders to be informed.

Initial thoughts :

we wish to retain the current ability to safely fly the cliffs and surrounding areas (Principles 2, 3, 4 & 6), (and effectively Principle 5)

the defined area should be over the sea (Principle 8), and should explicitly exclude the cliffs area between Dover and Folkestone

we wish to be added to the list of stakeholders to be informed and consulted.

We look forward to hearing from you in response to the above.

Please confirm, or advise our next steps. Regards

BHL Response (Dover and Folkestone Hang Gliding Club - 88898) – Draft Design Principles

Good Evening,

It's not Bristow's intention to limit access to airspace . The image shared in the initial application is only intended as a very rough guide to the area potentially affected by the change. It in no way represents any proposed design solution , these will come later in Stage 2. As per our design principle 8 , the main operating area to be located over the sea. There is no intention to operate over land. The only over land section will be an access route into Lydd airport. I hope this allays any concerns you may have.

Kind Regards,

Stakeholder (Dover and Folkestone Hang Gliding Club - 88898) Responses – Draft Design Principles

Dear Mr,

Thank you for the response. That sounds promising.

Would you also please confirm that we have been added to the Local Aviation Stakeholders list and will have the opportunity to be included in future discussions.

Many thanks.

Regards

BHL Response (Dover and Folkestone Hang Gliding Club - 88898) – Draft Design Principles

Good Morning ,

Thank you for your email, I can confirm your details have been added to the local stakeholders list as the Point of Contact for the Dover and Folkestone Hang Gliding Club. If you wish to add an additional POC please get in touch.

Best Regards,

Stakeholder (55665) Responses – Draft Design Principles

Dear Sir

I write as a regular user of airfields and airstrips in the region covered by this proposal.

It seems that in your list of Local Aviation Stakeholders, Fairoaks and Blackbushe are deemed interested, yet Ripple, Clipgate, Greenwood Farm, plus others, that are most definitely affected are not even mentioned. This seems at best to be incompetent, at worst insulting. Why Fairoaks and Blackbushe? Why not Clacton or Newcastle?

My main concern however is that your depiction of the airspace proposed is woefully inadequate. The current Notams are defined by latitude and longitude. Why not for this proposal? If you intend to retain the same areas, why is this not specified? If this is a matter of consultation with interested and affected parties, it would be useful, surely to provide clear ideas of what you are seeking.

The graphic depiction used could not be worse. It appears to be a sketch made by someone using the smallest scale map and the fattest wax crayon available. The existing airspace arrangements are clearly shown in all documentation and by lats and longs in all Notams, as required. One does not have to imagine where they are. I have been reassured today slightly, by a revised graphic that now shows the area to be offshore, which is the only logical place for it, but still without detail.... I trust that more exact definition will be forthcoming.

Whatever the efficacy, or otherwise, of the marine and UAS patrols in the area, there is little opposition generally amongst the pilot community. Indeed, we are additional eyes when flying and some of our number are active Aviation Community Policing Volunteers and members of Air Search. Such activity would also be affected by any additional airspace applied to the land of East Kent. My concern is that any proposed changes be made clearly and with exactitude, not in the manner that has, so far, seemed rather slipshod and that such proposals be communicated to all those affected. I want to have faith in those performing what is important work supporting our essential services.

Yours faithfully,

BHL Response (55665) – Draft Design Principles

Good Evening ,

Thank you for your email. The image shared in the initial application is only intended as a very rough guide to the area potentially affected by the change. This is a prerequisite of the CAA's initial application process. It in no way represents any proposed design solution and certainly doesn't contain the required accuracy of a finalised AIC on which a NOTAM would be based. Stage 1B simply defines the design principles on which any solution must be based. In accordance with the CAP1616 process (attached for your awareness) potential airspace design solutions will come later as part of Stage 2 'Design and Assess' and Stage 3 Consult. As well as being represented by the associations identified on the NATMAC list as included in this process (GAA,LAA,BGA,BHGA,BMAA) we thank you for identifying additional regional stakeholders and of course welcome their involvement in the process.

Kind Regards,

Stakeholder (55665) Responses – Draft Design Principles

Good morning,

Thank you for such a swift response.

I was aware that it is early in the defined process, but trust that you appreciate the original graphic was very worrying for local pilots and those using local landing grounds. I shall be following progress with interest.

Regards,

Stakeholder (67456) Responses – Draft Design Principles

Dear Mr...

I note your ACP and have a question. I may have missed it in the documents, but I didn't find provision for either an activation notification service, or any kind of crossing service,

As you know, this proposal covers the main GA crossing area for UK GA, and the danger areas are likely a significant factor in a recent accident that resulted in a double fatality. A crossing service would be, I imagine, an important factor?

Thanks

BHL Response (67456) – Draft Design Principles

Good Afternoon,

Thanks for your comments. An activation notification service, or any kind of crossing service suggests Bristow are only considering airspace segregation in the form of a danger area. As per our design principle 10 - 'Assess all airspace options available to deploy UAS BVLOS' Bristow are very interested in exploring alternative airspace options and challenging the requirement for segregated airspace as the only viable option for BVLOS operation of HM Coastguard UAS.

If this is written into the design principles it may limit our ability to design and develop alternative solutions that may provide these options.

The next step - Stage 2 'design and assess' will capture these options for consultation with our stakeholders. It's not Bristow's intention to limit access to airspace . The image shared in the initial application is only intended as a very rough guide to the area potentially affected by the change. It in no way represents any proposed design solution, these will come later in Stage 2.

Kind Regards,

Stakeholder Feedback Analysis

Draft Design Principle	Draft Design Principles (Stakeholder responses incorporated in green).	No. Stakeholders in Agreement with design principles	Stakeholder Responses	Design Principles for Submission to CAA.	Design Principles Rational
1	Must comply with UAS regulatory framework.	6		Must comply with UAS regulatory framework.	No Additional Feedback Received
2	Must consider the requirements of all potential users, including for rotary wing operations when icing may prohibit IFR transit above 1,500ft.	6	Stakeholder 35435: I'm hopeful that you've made a mistake in defining the area that covers the east of Kent as every other part of the defined area is over water. If not you have failed to satisfy 7 of the design principles that are laid out in Stage 1b design principles, those being items 2, 3, 4, 6, 7, 8 & 10	Must consider the requirements of all potential users, including for rotary wing operations when icing may prohibit IFR transit above 1,500ft.	The feedback relates to the assessment of airspace design options, rather than the airspace design principles. Airspace options have yet to be designed which takes place in a latter stage as defined in CAP1616. On this basis this has not been used to amend the design principles.
3	Maintain the current level of safety for use by all airspace users.	6	Stakeholder 35435: I'm hopeful that you've made a mistake in defining the area that covers the east of Kent as every other part of the defined area is over water. If not you have failed to satisfy 7 of the design principles that are laid out in Stage 1b design principles, those being items 2, 3, 4, 6, 7, 8 & 10	Maintain the current level of safety for use by all airspace users.	The feedback relates to the assessment of airspace design options, rather than the airspace design principles. Airspace options have yet to be designed which takes place in a latter stage as defined in CAP1616. On this basis this has not been used to amend the design principles.

Stakeholder Feedback Analysis

Draft Design Principle	Draft Design Principles (Stakeholder responses incorporated in green).	No. Stakeholders in Agreement with design principles	Stakeholder Responses	Design Principles for Submission to CAA.	Design Principles Rational
4	Minimise impact on other airspace users, such as utilising the flexible use of airspace principles.	6	Stakeholder 35435: I'm hopeful that you've made a mistake in defining the area that covers the east of Kent as every other part of the defined area is over water. If not you have failed to satisfy 7 of the design principles that are laid out in Stage 1b design principles, those being items 2, 3, 4, 6, 7, 8 & 10	Minimise impact on other airspace users, such as utilising the flexible use of airspace principles.	The feedback relates to the assessment of airspace design options, rather than the airspace design principles. Airspace options have yet to be designed which takes place in a latter stage as defined in CAP1616. On this basis this has not been used to amend the design principles.
5	Airspace must not constrain the host airport operation.	6		Airspace must not constrain the host airport operation.	No Additional Feedback Received
6	Must use the minimum area and altitude required to conduct effective operations.	6	Stakeholder 35435: I'm hopeful that you've made a mistake in defining the area that covers the east of Kent as every other part of the defined area is over water. If not you have failed to satisfy 7 of the design principles that are laid out in Stage 1b design principles, those being items 2, 3, 4, 6, 7, 8 & 10	Must use the minimum area and altitude required to conduct effective operations.	The feedback relates to the assessment of airspace design options, rather than the airspace design principles. Airspace options have yet to be designed which takes place in a latter stage as defined in CAP1616. On this basis this has not been used to amend the design principles.

Stakeholder Feedback Analysis

Draft Design Principle	Draft Design Principles (Stakeholder responses incorporated in green).	No. Stakeholders in Agreement with design principles	Stakeholder Responses	Design Principles for Submission to CAA.	Design Principles Rational
7	Avoid overflight of congested areas.	6	Stakeholder 35435: I'm hopeful that you've made a mistake in defining the area that covers the east of Kent as every other part of the defined area is over water. If not you have failed to satisfy 7 of the design principles that are laid out in Stage 1b design principles, those being items 2, 3, 4, 6, 7, 8 & 10	Avoid overflight of congested areas.	The feedback relates to the assessment of airspace design options, rather than the airspace design principles. Airspace options have yet to be designed which takes place in a latter stage as defined in CAP1616. On this basis this has not been used to amend the design principles.
8	Main operating area to be located over the sea.	6	Stakeholder 35435: I'm hopeful that you've made a mistake in defining the area that covers the east of Kent as every other part of the defined area is over water. If not you have failed to satisfy 7 of the design principles that are laid out in Stage 1b design principles, those being items 2, 3, 4, 6, 7, 8 & 10	Main operating area to be located over the sea.	The feedback relates to the assessment of airspace design options, rather than the airspace design principles. Airspace options have yet to be designed which takes place in a latter stage as defined in CAP1616. On this basis this has not been used to amend the design principles.
9	Minimise the noise and environmental impact on areas affected by the proposed change.	6		Minimise the noise and environmental impact on areas affected by the proposed change.	No Additional Feedback Received

Stakeholder Feedback Analysis

Draft Design Principle	Draft Design Principles (Stakeholder responses incorporated in green).	No. Stakeholders in Agreement with design principles	Stakeholder Responses	Design Principles for Submission to CAA.	Design Principles Rational
10	Assess all airspace options available to deploy UAS BVLOS.	6	Stakeholder 35435: I'm hopeful that you've made a mistake in defining the area that covers the east of Kent as every other part of the defined area is over water. If not you have failed to satisfy 7 of the design principles that are laid out in Stage 1b design principles, those being items 2, 3, 4, 6, 7, 8 & 10	Assess all airspace options available to deploy UAS BVLOS.	The feedback relates to the assessment of airspace design options, rather than the airspace design principles. Airspace options have yet to be designed which takes place in a latter stage as defined in CAP1616. On this basis this has not been used to amend the design principles.
11	Should the airspace no longer be required for UAS operations, it should be relinquished.	6		Should the airspace no longer be required for UAS operations, it should be relinquished.	No Additional Feedback Received

Stakeholder Feedback Analysis

Draft Design Principle	Draft Design Principles (Stakeholder responses incorporated in green).	No. Stakeholders in Agreement with design principles	Stakeholder Responses	Design Principles for Submission to CAA.	Design Principles Rational
N/A	<p>Stakeholder suggested design principle that is not aligned to the proposed design principles.</p> <p>Stakeholder 89890 response: Provide a DAAIS and DACS permanently. Easy enough to do via Lydd ATC.</p>	N/A	<p>Stakeholder 58503: "Yes, I do. On page 12, you have your draft design principles after stakeholder feedback. On page 11, you have responses from Stakeholder (25256). Two of these principles have made into your draft design principles after stakeholder feedback, one has not. It seems somewhat remiss of you to have excluded: 3. Provide a DAAIS and DACS permanently. Easy enough to do via Lydd ATC. from the draft design principles after stakeholder feedback."</p> <p>Stakeholder 67456: I note your ACP and have a question. I may have missed it in the documents, but I didn't find provision for either an activation notification service, or any kind of crossing service,</p> <p>As you know, this proposal covers the main GA crossing area for UK GA, and the danger areas are likely a significant factor in a recent accident that resulted in a double fatality. A crossing service would be, I imagine, an important factor?</p>	N/A	<p>As the airspace design options have not been undertaken (these relate to Danger Areas), it is not known whether a DAAIS or DACS would be appropriate. Further by including this as a design principle it pushes the design options towards Danger Areas. This has not been included for these reasons.</p>

Design Principles for CAA Approval (post stakeholder feedback)

- The design principles below will be submitted to the CAA for consideration and were derived through stakeholder consultation and the feedback provided (green):

Item	Design Principles
1	Must comply with UAS regulatory framework.
2	Must consider the requirements of all potential users, including for rotary wing operations when icing may prohibit IFR transit above 1,500ft.
3	Maintain or enhance the current level of safety for use by all airspace users.
4	Minimise impact on other airspace users, such as utilising the flexible use of airspace principles.
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.
11	Should the airspace change no longer be required for UAS operations, it should be relinquished.

Next Steps



These design principles are submitted for consideration by the CAA. On approval, these design principles will inform the next stage of the CAP1616 process 'Develop and Assess'. We will then begin to develop and assess the viability and suitability of specific airspace design options with our stakeholders.



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 was 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.

References

- Letter: Stakeholder Engagement Document English Channel Stage 1 Define
- Stakeholder Presentation: 20220707 - Bristow UAS - 1B Draft Design Principles (version 2).
- BHL ACP - Stakeholder Management Tracker 13072022.
 - TAB: Stakeholder Register
 - TAB: Stakeholder Engagement Log
 - TAB: Proposed Design Principles – Feedback
 - TAB: Proposed Design Principles – Response Graph
 - TAB: Proposed Design Principles – Analysis Matrix
 - TAB: Draft Design Principles – Feedback
 - TAB: Draft Design Principles – Response Graph
 - TAB: Draft Design Principles – Analysis Matrix
- ACP-2021-088 - Stage1B - Stakeholder Communications 14072022.

How to get in contact with us

- For any communications regarding Airspace Change Proposal ACP-2021-088 please use the email below:
- AirspaceChangeProposal@BristowGroup.com

Annex A – Identified Stakeholders

Stakeholder	Remarks
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	
Border Force	Consultation through HMG Home Office Department
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	
Bristow Helicopters Limited	
2excel Aviation	

Annex A – Identified Stakeholders

Stakeholder	Remarks
Drone Major	
Dungness Power Station	
General Aviation Alliance (GAA)	
Guild of Air Traffic Control Officers (GATCO)	
Home Office	
Honourable Company of Air Pilots (HCAP)	
Helicopter Club of Great Britain (HCGB)	
Heavy Airlines	
Hythe Ranges	Consultation response will be through DAATM
Iprosurv	
Isle of Man CAA	
Light Aircraft Association (LAA)	
Low Fare Airlines	
Lydd Airport	
Lydd Ranges	Consultation response will be through DAATM
Maritime and Coastguard Agency	
Military Aviation Authority (MAA)	Change of email address to be used for all correspondence relating to the ACP
Ministry of Defence - Defence Airspace and Air Traffic Management (MoD DAATM)	
NATS	

Annex A – Identified Stakeholders

Stakeholder	Remarks
Royal Navy Command HQ	Consultation response will be through DAATM
PPL/IR (Europe)	
RVL Group	
Tekever	
UK Airprox Board (UKAB)	
UK Flight Safety Committee (UKFSC)	
United States Air Force Europe (3rd Air Force-Directorate of Flying (USAFE (3rd AF-DOF))	
Lashenden/Headcorn Aerodrome	
Manston International Airport	
Channel Gliding Club	
Harringe Airstrip (Kent Microlight Club)	
Pent Farm	
Witherenden	
Swanbough farmstrip	
Deanland Airfield	
Shoreham/Brighton City Airport	
London Heathrow	
London Luton	Change of email address to be used for all correspondence relating to the ACP
London Gatwick Airport	
Redhill aerodrome	

Annex A – Identified Stakeholders

Stakeholder	Remarks
London Southend airport	
Dover HM Coastguard	
Hamilton Farm (minor afd)	
Tiffenden (minor Afd)	
Coldharbour Farm (Kent Microlight Club)	
Egerton (Kent Microlight Club)	
Rochester Airport	
Biggin Hill Airport	
Fairoaks Airport	
Chichester/Goodwood	
Blackbushe	
Kent County Council (Transport and Highways)	
MP for Folkestone and Hythe	
Spilsten Airfield	
Woodchurch Airfield	
Stanstead Airport	
SaxonAir	
[REDACTED]	
[REDACTED]	Added as part of stage 1b: design principles
[REDACTED]	Added as part of stage 1b: design principles
Dover and Folkestone Hang Gliding Club	Added as part of stage 1b: design principles
[REDACTED]	Added as part of stage 1b: design principles
[REDACTED]	Added as part of stage 1b: design principles