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## Airspace Change Proposal 2021-088 – Stakeholder Engagement Evidence

### Contents

- Exchanges with stakeholders following stakeholder notification dated 7 June 22.
- Completed Annex A's to Stakeholder notification received from stakeholders.
- Exchanges with stakeholders following proposed design principles dated 7 July 22.
- Annex A – Identified Stakeholders.
- Annex B - Letter: Stakeholder Engagement Document English Channel Stage 1 Define.



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## Exchanges with stakeholders following stakeholder notification dated 7 June 22

**From:** [REDACTED]  
**Sent on:** Monday, June 20, 2022 1:27:40 PM  
**To:** Airspace Change Proposal <airspacechangeproposal@bristowgroup.com>  
**Subject:** RE: Airspace Design Feedback

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

Thanks [REDACTED].

*Best Regards*



☎: [REDACTED] | 📱: [REDACTED] | [Chat with me on Teams!](#)

| [www.2excelaviation.com](http://www.2excelaviation.com)

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**From:** Airspace Change Proposal <airspacechangeproposal@bristowgroup.com>  
**Sent:** 20 June 2022 13:18  
**To:** [REDACTED] Airspace Change Proposal  
<airspacechangeproposal@bristowgroup.com>  
**Subject:** RE: Airspace Design Feedback





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Afternoon [REDACTED],

I can confirm the intent of Point 2 is to consider the requirements of all potential users of the airspace . This will not be limited to unmanned operations as per our statement need which states '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'.

Kind Regards,

[REDACTED]

**Bristow Search & Rescue**

Dyce Avenue  
Dyce, Aberdeen  
AB21 0LQ

[REDACTED]



*Global Leader in Vertical Flight.*

**From:** [REDACTED]  
**Sent:** 20 June 2022 12:28  
**To:** Airspace Change Proposal <[airspacechangeproposal@bristowgroup.com](mailto:airspacechangeproposal@bristowgroup.com)>  
**Subject:** Airspace Design Feedback

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

Hi Guys,

Thanks for sight of the design process, all looks good. Can I ask for a little more detail on point 2 please. I'd like specific consideration to allow manned operations within any new airspace. Specifically, manned surveillance operations in support of the same operations this airspace is designed to enable.

Thanks



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Best Regards



☎: [REDACTED]  [Chat with me on Teams!](#)

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## Re: English Channel airspace change proposal (ACP-2021-088)

Airspace Change Proposal <airspacechangeproposal@bristowgroup.com>

Thu 23/06/2022 14:58

To:

- [REDACTED]

1 attachments (58 KB)

Stakeholder Engagement Document English Channel Stage 1 Define - Annex A.docx;





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Good Afternoon [REDACTED],

Thank you for your suggestion, which will be taken into consideration as we work to finalise the design principles.

Regarding the response form, please find attached a word version, should you wish to comment.

Best Regards,

Bristow UAS.

**From:** [REDACTED]  
**Sent:** 09 June 2022 13:33  
**To:** Airspace Change Proposal <airspacechangeproposal@bristowgroup.com>  
**Subject:** RE: English Channel airspace change proposal (ACP-2021-088)

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Bristow

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

As it is in PDF the response form is impossible to use

[REDACTED]

[REDACTED]  
British Helicopter Association  
Unit C2  
Fairoaks Airport  
Chobham  
Surrey. GU24 8HU

[REDACTED]  
[www.britishhelicopterassociation.org](http://www.britishhelicopterassociation.org)



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**From:** Airspace Change Proposal <airspacechangeproposal@bristowgroup.com>

**Sent:** 08 June 2022 15:36

**To:** [REDACTED]

**Subject:** English Channel airspace change proposal (ACP-2021-088)

**Importance:** High

Dear valued Stakeholder,

Bristow Helicopters Ltd and the Maritime and Coastguard Agency are contacting you today to invite your opinion on the design principles of our current airspace change proposal as detailed in the document attached. Full details of the proposal can found at [Airspace change portal \(caa.co.uk\)](https://www.caa.co.uk/airspace-change-portal), then selecting 'search by Airspace Change ID' and entering ACP reference ACP-2021-088. Your responses will be used to define and agree a set of specific design principles on which future airspace design options will be based. We look forward to your feedback and continued engagement in this process.

Kind Regards,

### **Bristow Search & Rescue**

Dyce Avenue  
Dyce, Aberdeen  
AB21 0LQ



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**Re: ACP-2021-088**





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Airspace Change Proposal <airspacechangeproposal@bristowgroup.com>

Thu 07/07/2022 20:56

To:

[Redacted]

Thank you for your feedback and the BMAA policy document, which will be taken into consideration as we work to finalise the design principles.

Best Regards,

[Redacted]

From:

[Redacted]

Sent: 07 July 2022 16:48

To: Airspace Change Proposal <airspacechangeproposal@bristowgroup.com>

Cc:

[Redacted]

Subject: Re: ACP-2021-088

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

Dear Bristows,

Please find attached your engagement document and see the the feedback page completed. Please excuse that I don't have access to properly edit PDF files but I hope you can accept feedback on behalf of the BMAA.

I will also send you separately a copy of the BMAA's general principles document.

As explained before, as an organisation assisted by unpaid volunteers we do require more time to respond to engagement than your initial material allowed and that is partly why CAP1616 requires those recommended time periods. We do wish the CAA would not agree to unacceptable timelines, especially for ACPs for permanent DAs.

Best regards

[Redacted]





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On 14 Jun 2022, at 12:50, Airspace Change Proposal <airspacechangeproposal@bristowgroup.com> wrote:

Good afternoon [REDACTED],

Thanks for your email.

Notification and our engagement letter was sent to [REDACTED] on the email (cc'd above) on Wednesday the 8<sup>th</sup> of June at approx. 1545L. The NATMAC list didn't state which of the two email addresses listed was the prime POC for BMAA. In hindsight we could have targeted both.

As you rightly point out, this stage doesn't represent a consultation on ACP design options. Stage 1B only sets out to engage stakeholders on a defining the design principles on which any potential solutions must be considered against. Full consultation on options developed as part of Stage 2 of this process will of course be carried out in Stage 3.

NATMAC members and the other stakeholders identified in the engagement document were all contacted on Wednesday the 8<sup>th</sup> of June to which we are receiving returns. Please kindly advise what the BMMA consider as an acceptable timeframe to respond to Annex A.

Kind Regards,

**Bristow Search & Rescue**



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**From:** [REDACTED]  
**Sent:** 12 June 2022 22:46  
**To:** Airspace Change Proposal <airspacechangeproposal@bristowgroup.com>  
**Cc:** [REDACTED]  
**Subject:** ACP-2021-088

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

Good evening,

I have come across your Stakeholder Engagement Letter that was uploaded to the CAA ACP portal on 08/06/22 by chance and note that as the NATMAC-listed contact for the British Microlight Aircraft Association (BMAA) we have not had any direct communication from you on this ACP. I am very much concerned that you list a deadline for engagement of this material as 26/06/22, which would give a total of 19 days engagement IF we had been engaged on 08/06/22. As of this evening (12/06/22) we now have just 14 days left, purely by chance.

I would, therefore, likely to complain that this engagement is inadequate for what is an ACP for a permanent airspace change, even though this is Stage 1B Design Principles. Whether this is part of the agreed timeline by the CAA makes it even worse as the CAA should know better than to assess 19 days as an acceptable maximum engagement period – which you have anyway not met considering that notice has been stumbled across, to leave 14 days. We must view this as inadequate engagement.

Please extend this engagement period to enable us to consult with our members – and kindly advise when you planned to contact NATMAC members?

Regards

[REDACTED]  
BMAA Airspace Team lead

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**Bristow**  
Search and Rescue

Results By Date ↑

Last Week

English Channel airspace chan... Wed 08/06

Dear valued Stakeholder,

Search Complete.

English Channel airspace change proposal (ACP-2021-088)

AC Airspace Change Proposal

To [Redacted]

Retention Policy 180 Day Delete (6 months)

Expires 05/12/2022

This message was sent with High importance.

Reply Reply All Forward

Wed 08/06/2022 15:4

Stakeholder Engagement Document English Channel Stage 1 Define.pdf 499 KB

Dear valued Stakeholder,

Bristow Helicopters Ltd and the Maritime and Coastguard Agency are contacting you today to invite your opinion on the design principles of our current airspace change proposal as detailed in the document attached. Full details of the proposal can found at [Airspace change portal \(caa.co.uk\)](https://www.caa.co.uk/air-space-change), then selecting 'search by Airspace Change ID' and entering ACP reference ACP-2021-088. Your responses will be used to define and agree a set of specific design principles on which future airspace design options will be based. We look forward to your feedback and continued engagement in this process.

Kind Regards,

**Bristow Search & Rescue**

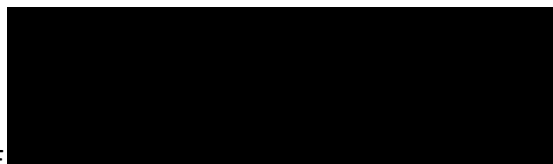
Dyce Avenue  
Dyce, Aberdeen  
AB21 0LQ

**Re: English Channel airspace change proposal (ACP-2021-088)**

Airspace Change Proposal <airspacechangeproposal@bristowgroup.com>

Tue 05/07/2022 23:09

To:



Good E

Thank you for your feedback, which will be taken into consideration as we work to finalise the design principles.

Best Regards,



From:



Sent: 10 June 2022 20:22

To: Airspace Change Proposal <airspacechangeproposal@bristowgroup.com>

Subject: FW: English Channel airspace change proposal (ACP-2021-088)

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Dear Bristow,





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Please see attached.

I would like to see the design principles, consideration for commercial rotary wing operations when icing may be encountered. I would like to see the current upper limit to the TDA EG 098 complex.

At SaxonAir, we are committed to sustainability. We offset carbon emissions produced by all our flights as part of our ongoing commitment to sustainability. Planting trees for every flight.

Ger

Cc:

Subject:

FYI

rt, Norwich, NR6 6JT

[View Brochure](#)





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SaxonAir Ch...  
The informa...  
sender imme...  
... Norwich Airport, Norwich, NR6 6JT. Registered in England: 6187045.  
... be privileged. If you have received it in error, please destroy this message, delete any copies held on your systems and notify the

... TO>

Sen  
To:

... nge proposal (ACP-2021-088)

Dear [REDACTED]  
Please find below and attached information from Bristow Group re English Channel Airspace Change Proposal ACP-2021-088.  
Dear valued Stakeholder,  
Bristow Helicopters Ltd and the Maritime and Coastguard Agency are contacting you today to invite your opinion on the design principles of our current airspace change proposal as detailed in the document attached. Full details of the proposal can found at [Airspace change portal \(caa.co.uk\)](https://www.caa.co.uk/air-space-change-portal), then selecting 'search by Airspace Change ID' and entering ACP reference ACP-2021-088.  
Your responses will be used to define and agree a set of specific design principles on which future airspace design options will be based. We look forward to your feedback and continued engagement in this process.  
Kind Regards

You can update your Mailing Preferences at any time from this [Communication Preferences](#). (Only follow the link if this email is addressed to you.) Alternatively contact [REDACTED]





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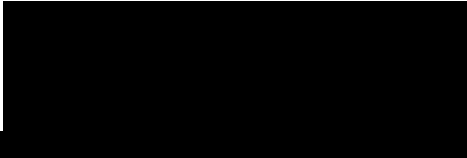


**Re: ACP 2021 088 - Stage 1B Harringe airstrip/KMAC response**

Airspace Change Proposal <airspacechangeproposal@bristowgroup.com>

Tue 05/07/2022 23:08

To:



Thank you for your feedback, which will be taken into consideration as we work to finalise the design principles.

We have added your details, so you will be included in future communications.

Best Regards,



**From:**



**Sent:** 05 July 2022 07:55

**To:** Airspace Change Proposal <airspacechangeproposal@bristowgroup.com>

**Cc:**



**Subject:** ACP 2021 088 - Stage 1B Harringe airstrip/KMAC response

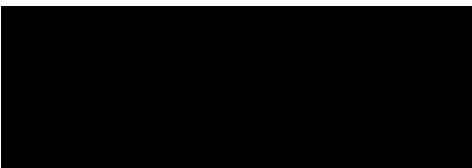
CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Bristow Helicopters,

I am responding on behalf of Harringe airstrip/KMAC to Stage 1B of the ACP as outlined in the Stakeholder Engagement Letter.

Our response is late because I have not been receiving emails on this. I am one of two contacts named for Harringe airstrip/KMAC as passed onto you through the relevant engagement channels.

Our response is attached



Please can you add S  
of the Local Aviation

to the email circulation list for this ACP. We are part



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Thank you.

[Redacted]

---

**From:** [Redacted]  
**Sent on:** Thursday, June 9, 2022 9:14:58 AM  
**To:** Airspace Change Proposal <airspacechangeproposal@bristowgroup.com>  
**Subject:** Re: Stakeholder Engagement Letter

[Redacted]

Thank you for the update and I do not have any further points on annex a.

Cheers

[Redacted]

[Redacted]

**Bristow Helicopters**  
Dyce Avenue, Dyce  
Aberdeen  
AB21 0LQ

[Redacted]

*Confidence in flight. Worldwide.*

**From:** Airspace Change Proposal <airspacechangeproposal@bristowgroup.com>  
**Sent:** 08 June 2022 13:20  
**To:** [Redacted]





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**Subject:** Stakeholder Engagement Letter

Gents,

Please find attached ACP engagement document detailing next steps of our application (Stage 1B).

█, from an internal stakeholder and SAR(H) ops stand point could I ask you to respond or delegate a response to Annex A please.

Kind Regards,

**Bristow Search & Rescue**

Dyce Avenue  
Dyce, Aberdeen  
AB21 0LQ



*Global Leader in Vertical Flight.*

**From:** █

**Sent on:** Monday, June 13, 2022 2:52:13 PM

**To:** Airspace Change Proposal <airspacechangeproposal@bristowgroup.com>

**Subject:** RE: English Channel airspace change proposal (ACP-2021-088)

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

Good afternoon,

The MOD considers the list of DP's to be appropriate and believe DP's 3,4, and 6 to be the highest priority of those listed. There are no DP's that the MOD would like to put forward for consideration.





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Best regards,



**From:** Airspace Change Proposal <airspacechangeproposal@bristowgroup.com>

**Sent:** 08 June 2022 14:26

**To:** [Redacted]

**Subject:** English Channel airspace change proposal (ACP-2021-088)

**Importance:** High

Dear valued Stakeholder,

Bristow Helicopters Ltd and the Maritime and Coastguard Agency are contacting you today to invite your opinion on the design principles of our current airspace change proposal as detailed in the document attached. Full details of the proposal can found at [Airspace change portal \(caa.co.uk\)](https://www.caa.co.uk/airspace-change-portal), then selecting 'search by Airspace Change ID' and entering ACP reference ACP-2021-088. Your responses will be used to define and agree a set of specific design principles on which future airspace design options will be based. We look forward to your feedback and continued engagement in this process.

Kind Regards,

**Bristow Search & Rescue**

Dyce Avenue  
Dyce, Aberdeen  
AB21 0LQ



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**From:** [REDACTED]  
**Sent on:** Friday, June 17, 2022 7:36:40 AM  
**To:** Airspace Change Proposal <airspacechangeproposal@bristowgroup.com>  
**Subject:** FW: English Channel airspace change proposal (ACP-2021-088)  
**Urgent:** High

**Attachments:** Stakeholder Engagement Document English Channel Stage 1 Define.pdf (497.38 KB)

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

Hi [REDACTED]

To keep you in the loop. This is making its way through the MoD and hopefully will end up on the right desk for you. To date its sitting with Sqn Ldr [REDACTED] (email details below) should you need to chase.

Regards

[REDACTED] | Training Safety Officer Hythe Range | UK Defence Training Estate – South East | Defence Infrastructure Organisation | Hythe Ranges | Dymchurch Road | Hythe | Kent | CT21 6QD

[Skype IM & Voice Call](#)

Website: [www.gov.uk/dio/](http://www.gov.uk/dio/)

Twitter: @mod\_dio

Read DIO's blog <https://insidedio.blog.gov.uk/>

[Hythe Range Orders](#)



Defence Infrastructure Organisation





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**From:** [REDACTED]  
**Sent:** 16 June 2022 12:41  
**To:** [REDACTED]  
**Cc:** [REDACTED] [airspacechangeproposal@bristowgroup.com](mailto:airspacechangeproposal@bristowgroup.com)  
**Subject:** FW: English Channel airspace change proposal (ACP-2021-088)  
**Importance:** High

Hi [REDACTED]

Is this something your team are tracking with NATS?

English Channel Airspace Requirements – (ACP 2021 088) – Please see attached.

Kind Regards,

[REDACTED] SO2 Air Safety | Overseas and Training Region | Regional Delivery |  
Defence Infrastructure Organisation | Building 25 Waterloo Lines | Imber Road | Warminster | BA12

0DJ (for satnav use BA12 0DY) [REDACTED]

Useful Links **Revised May 22:** [RA1600 - RPAS](#) [ASIMS](#) [UK DTE Location](#) [Mil Training Area](#)  
[Maps](#) [RSOs](#) [JSP Index](#) [JSP 918 JTAC Policy](#) [ACAWEWROs](#) [Pam 300 Ed 4](#)



Defence Infrastructure Organisation

**From:** [REDACTED]  
**Sent:** 16 June 2022 12:27  
**To:** [REDACTED]  
**Subject:** FW: English Channel airspace change proposal (ACP-2021-088)  
**Importance:** High

[REDACTED],  
Noted thank you.

[REDACTED] – one for you I think?



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Regards

[Redacted]

[Redacted] UK Defence Training Estate – South East | Defence  
Infrastructure Organisation | Longmoor Camp | Liss | Hants | GU33 6EL

Email: [Redacted]  
Skype IM & Voice Call: [Redacted]  
Website: [www.gov.uk/dio/](http://www.gov.uk/dio/)  
Twitter: @mod\_dio  
Read DIO's blog: <https://insidedio.blog.gov.uk/>

Guiding Principles: **My Word is my Bond; Trust but Verify; Willingness to Stop; Procedural Compliance**



Defence Infrastructure Organisation

From: [Redacted]

Sent: 16 June 2022 10:28

To: [Redacted]

Subject: FW: English Channel airspace change proposal (ACP-2021-088)

Importance: High

[Redacted]

This has come in to me via the S&R team at Lydd Airport. However, I believe this should be directed to SO2 Air?

Regards

[Redacted]

[Redacted] | Training Safety Officer Hythe Range | UK Defence Training Estate – South East | Defence  
Infrastructure Organisation | Hythe Ranges | Dymchurch Road | Hythe | Kent | CT21 6QD

(for satnav use CT21 6PG)

[Redacted]

[Skype IM & Voice Call](#)  
Website: [www.gov.uk/dio/](http://www.gov.uk/dio/)  
Twitter: @mod\_dio  
Read DIO's blog <https://insidedio.blog.gov.uk/>  
[Hythe Range Orders](#)



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Defence Infrastructure Organisation

**From:** Airspace Change Proposal <[airspacechangeproposal@bristowgroup.com](mailto:airspacechangeproposal@bristowgroup.com)>

**Sent:** 10 June 2022 13:28

**To:** [REDACTED]

**Subject:** English Channel airspace change proposal (ACP-2021-088)

Dear [REDACTED],

Thank you for the advice to my colleague [REDACTED] over the phone. Would you be kind enough to forward the email below and attached letter to department that manages MoD ranges in the South East? Alternatively if you have a point of contact within this department, please send this over and we will get in touch with them directly.

Best Regards,

[REDACTED]

-----

Dear valued Stakeholder,

Bristow Helicopters Ltd and the Maritime and Coastguard Agency are contacting you today to invite your opinion on the design principles of our current airspace change proposal as detailed in the document attached. Full details of the proposal can found at [Airspace change portal \(caa.co.uk\)](https://caa.co.uk), then selecting 'search by Airspace Change ID' and entering ACP reference ACP-2021-088. Your responses will be used to define and agree a set of specific design principles on which future airspace design options will be based. We look forward to your feedback and continued engagement in this process.

Kind Regards,

## Bristow Search & Rescue

Dyce Avenue  
Dyce, Aberdeen  
AB21 0LQ





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**From:** [REDACTED]  
**Sent on:** Friday, June 10, 2022 12:47:10 PM  
**To:** Airspace Change Proposal <airspacechangeproposal@bristowgroup.com>  
**Subject:** RE: English Channel airspace change proposal (ACP-2021-088)

**Follow up:** Follow up  
**Start date:** Monday, June 13, 2022 12:00:00 AM  
**Due date:** Monday, June 13, 2022 12:00:00 AM

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Hello,

Thank you for sharing details of your airspace change proposal with London Luton Airport.





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We welcome the opportunity to comment on your design principles. We agree with all the proposed design principles in your document, and do not wish to add any further principles.

We also noticed Stansted airport were not in your list of stakeholders, you may wish to engage them around this proposal too.

Finally, for all future correspondence regarding this ACP please can you contact us on [REDACTED]

Kind regards,



London Luton Airport



London Luton Airport  
Percival House, Percival Way  
Luton, LU2 9NU  
[W london-luton.co.uk](http://london-luton.co.uk)

**From:** Airspace Change Proposal <[airspacechangeproposal@bristowgroup.com](mailto:airspacechangeproposal@bristowgroup.com)>

**Sent:** 08 June 2022 16:25

**To:** [REDACTED]

**Subject:** [EXTERNAL] English Channel airspace change proposal (ACP-2021-088)

**Importance:** High

Dear valued Stakeholder,

Bristow Helicopters Ltd and the Maritime and Coastguard Agency are contacting you today to invite your opinion on the design principles of our current airspace change proposal as detailed in the document attached. Full details of the proposal can found at [Airspace change portal \(caa.co.uk\)](https://www.caa.co.uk/Airspace-change-portal), then selecting 'search by Airspace Change ID' and entering ACP reference ACP-2021-088. Your responses will be used to define and agree a set of specific design principles on which future airspace design options will be based. We look forward to your feedback and continued engagement in this process.

Kind Regards,

**Bristow Search & Rescue**

Dyce Avenue





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Dyce, Aberdeen  
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London Luton Airport Operations Limited is a company registered in England and Wales with registration number 03491213 whose registered office is at Percival House, 134 Percival Way, London Luton Airport, Luton, United Kingdom, LU2 9NU

---

**From:** [REDACTED]

**Sent on:** Wednesday, June 8, 2022 12:52:17 PM

**To:** Airspace Change Proposal <airspacechangeproposal@bristowgroup.com>

**Subject:** Re: ACP 2021 088

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

Thanks [REDACTED]

I'll have a look at it and get a response back to you.

Regards

[REDACTED]



Maritime &  
Coastguard  
Agency



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**From:** Airspace Change Proposal <airspacechangeproposal@bristowgroup.com>

**Sent:** Wednesday, June 8, 2022 1:27:28 PM

**To:** [REDACTED]

**Subject:** ACP 2021 088

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Good afternoon [REDACTED],

Please find attached our Stage 1B stakeholder engagement letter. Could I ask you to respond to or delegate a response to Annex A please. Also an opportunity to share internally to capture any other design principles the MCA may wish to be considered.

Kind Regards,

[REDACTED]

[REDACTED]

**Bristow Search & Rescue**

Dyce Avenue

Dyce, Aberdeen

AB21 0LQ





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*Global Leader in Vertical Flight.*

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**From:** Airspace Change Proposal <airspacechangeproposal@bristowgroup.com> on behalf of Airspace Change Proposal

**Sent on:** Wednesday, June 15, 2022 10:11:07 AM

**To:**



**Subject:** RE: English Channel airspace change proposal (ACP-2021-088)

Dear [REDACTED],

Thank you for your email. All received. As well as providing additional design principles for consideration, if you have any feedback on the Design Principles as laid out in the letter it would be gratefully received.

Kind Regards,

**Bristow Search & Rescue**

Dyce Avenue  
Dyce, Aberdeen  
AB21 0LQ



*Global Leader in Vertical Flight.*

**From:** [REDACTED]

**Sent:** 14 June 2022 09:00

**To:** [REDACTED]

**Subject:** RE: English Channel airspace change proposal (ACP-2021-088)

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Dear Sir

In response to your email  
Essential design principles.

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



Sent from my Galaxy

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

From: Airspace Change Proposal <[airspacechangeproposal@bristowgroup.com](mailto:airspacechangeproposal@bristowgroup.com)>

Date: 08/06/2022 17:29 (GMT+00:00)

To: 



Maritime &  
Coastguard  
Agency



Subject: English Channel airspace change proposal (ACP-2021-088)

Dear valued Stakeholder,

Bristow Helicopters Ltd and the Maritime and Coastguard Agency are contacting you today to invite your opinion on the design principles of our current airspace change proposal as detailed in the document attached. Full details of the proposal can found at [MailScanner has detected a possible fraud attempt from "airspacechange.caa.co.uk" claiming to be Airspace change portal \(caa.co.uk\)](#), then selecting 'search by Airspace Change ID' and entering ACP reference ACP-2021-088. Your responses will be used to define and agree a set of specific design principles on which future airspace design options will be based. We look forward to your feedback and continued engagement in this process.

Kind Regards,

### **Bristow Search & Rescue**

Dyce Avenue  
Dyce, Aberdeen  
AB21 0LQ



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**Completed Annex A's to Stakeholder notification received from stakeholders.**

- **Harringe Airstrip**

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.	Agree	
2. Must consider the requirements of all potential users.	Agree	
3. Must be safe for use by all airspace users.	Agree	
4. Minimise impact on other airspace users.	Agree	
5. Airspace must not constrain the host airport operation.	Agree	
6. Must use the minimum area and altitude required to conduct effective operations.	Agree	
7. Avoid overflight of congested areas.	Agree	
8. Main operating area to be located over the sea.	Agree	



9. Minimise the noise and environmental impact on areas affected by the proposed change.	Agree	
10. Assess all airspace options available to deploy UAS BVLOS.	Agree	
11. Despite all the points above, must recognise the inherent importance of the channel crossing area for VFR aircraft when there is a low cloudbase.	Agree	
12. Must have easy mechanisms for	Agree	

declaring airspace not in use and for confirming current status.		
--	--	--



- **SaxonAir**

**11. Annex A**

**Stage 1B Proposed Design Principles** (please complete and return to [airspacechangeproposal@bristowgroup.com](mailto: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.	Yes	
2. Must consider the requirements of all potential users.	Yes	
3. Must be safe for use by all airspace users.	Yes	
4. Minimise impact on other airspace users.	Yes	
5. Airspace must not constrain the host airport operation.	Yes	
6. Must use the minimum area and altitude required to conduct effective operations.	Yes	
7. Avoid overflight of congested areas.	Yes	
8. Main operating area to be located over the sea.	Yes	
9. Minimise the noise and environmental impact on areas affected by the proposed change.	Yes	
10. Assess all airspace options available to deploy UAS BVLOS.	Yes	



- **BMAA**

**11. Annex A**

**Stage 1B Proposed Design Principles** (please complete and return to [airspacechangeproposal@bristowgroup.com](mailto: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.	Agree	
2. Must consider the requirements of all potential users.	Agree	
3. Must be safe for use by all airspace users.	Agree	
4. Minimise impact on other airspace users.	Agree	
5. Airspace must not constrain the host airport operation.	Agree	
6. Must use the minimum area and altitude required to conduct effective operations.	Agree	
7. Avoid overflight of congested areas.	Agree	
8. Main operating area to be located over the sea.	Agree	
9. Minimise the noise and environmental impact on areas affected by the proposed change.	Agree	
10. Assess all airspace options available to deploy UAS BVLOS.	Agree	
11. Employ Flexible Use Airspace principles. I.E. deactivate when not required.		
12. Deactivate the DA if requirement ceases to exist.		
13. Provide a DAAIS and DACS permanently. Easy enough to do via Lydd ATC.		





Maritime &  
Coastguard  
Agency



## Exchanges with stakeholders following proposed design principles dated 7 July 22

[REDACTED]

Tue 12/07/2022 10:28

To:

- Airspace Change Proposal <airspacechangeproposal@bristowgroup.com>

Cc:

- [REDACTED]

**CAUTION** [REDACTED] ments unless you recognize the sender and know the content is safe.

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,

[REDACTED]

**From:** Airspace Change Proposal <airspacechangeproposal@bristowgroup.com>

**Sent:** 11 July 2022 13:22

**To:** [REDACTED]

**Subject:** Re: English Channel airspace change proposal (ACP-2021-088)

Dear valued Stakeholder,

We sent you a copy of the Design Principles we are preparing to submit to the CAA. Do you have any follow-on comments regarding the amended design principles?



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Kind Regards,

### **Bristow Search & Rescue**

Dyce Avenue  
Dyce, Aberdeen  
AB21 0LQ

**From:** Airspace Change Proposal <[airspacechangeproposal@bristowgroup.com](mailto:airspacechangeproposal@bristowgroup.com)>

**Sent:** 07 July 2022 22:21

**To:** [REDACTED]

**Subject:** English Channel airspace change proposal (ACP-2021-088)

Dear valued Stakeholder,

We recently contacted you to ask your opinion on the design principles of our current airspace change proposal ACP-2021-088.

Following the initial email we have received a number of responses that have been used to inform and develop the draft design principles. To capture this we have prepared a summary of the stakeholder engagement and the draft design principles, which will be submitted to the CAA for their consideration. Please find attached a copy of this for your interest.

Kind Regards,

### **Bristow Search & Rescue**

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Dyce, Aberdeen  
AB21 0LQ



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#### RE: English Channel airspace change proposal (ACP-2021-088)

Tue 12/07/2022 07:56

To:

- Airspace Change Proposal <airspacechangeproposal@bristowgroup.com>

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Good morning,

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

Best regards,





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[REDACTED]

**From:** Airspace Change Proposal <[airspacechangeproposal@bristowgroup.com](mailto:airspacechangeproposal@bristowgroup.com)>  
**Sent:** 11 July 2022 13:22  
**To:** [REDACTED]  
**Subject:** Re: English Channel airspace change proposal (ACP-2021-088)

Dear valued Stakeholder,

We sent you a copy of the Design Principles we are preparing to submit to the CAA. Do you have any follow-on comments regarding the amended design principles?

Kind Regards,

## **Bristow Search & Rescue**

Dyce Avenue  
Dyce, Aberdeen  
AB21 0LQ

**From:** Airspace Change Proposal <[airspacechangeproposal@bristowgroup.com](mailto:airspacechangeproposal@bristowgroup.com)>  
**Sent:** 07 July 2022 22:20  
**To:** [REDACTED]  
**Subject:** English Channel airspace change proposal (ACP-2021-088)

Dear valued Stakeholder,



Maritime &  
Coastguard  
Agency



We recently contacted you to ask your opinion on the design principles of our current airspace change proposal ACP-2021-088.

Following the initial email we have received a number of responses that have been used to inform and develop the draft design principles. To capture this we have prepared a summary of the stakeholder engagement and the draft design principles, which will be submitted to the CAA for their consideration. Please find attached a copy of this for your interest.

Kind Regards,

### **Bristow Search & Rescue**

Dyce Avenue  
Dyce, Aberdeen  
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**RE: English Channel airspace change proposal (ACP-2021-088)**





Maritime &  
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[REDACTED]  
Mon 11/07/2022 12:31

To:

- Airspace Change Proposal <airspacechangeproposal@bristowgroup.com>

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No comments

Yours

[REDACTED]  
British Helicopter Association  
Unit C2  
Fairoaks Airport  
Chobham  
Surrey. GU24 8HU

[REDACTED]  
[www.britishhelicopterassociation.org](http://www.britishhelicopterassociation.org)

**From:** Airspace Change Proposal <airspacechangeproposal@bristowgroup.com>

**Sent:** 11 July 2022 13:18

**To:** [REDACTED]

**Subject:** Re: English Channel airspace change proposal (ACP-2021-088)

Dear valued Stakeholder,



Maritime &  
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Agency



We sent you a copy of the Design Principles we are preparing to submit to the CAA. Do you have any follow-on comments regarding the amended design principles?

Kind Regards,

### **Bristow Search & Rescue**

Dyce Avenue  
Dyce, Aberdeen  
AB21 0LQ

**From:** Airspace Change Proposal <[airspacechangeproposal@bristowgroup.com](mailto:airspacechangeproposal@bristowgroup.com)>

**Sent:** 07 July 2022 22:08

**To:** [REDACTED]

**Subject:** English Channel airspace change proposal (ACP-2021-088)

Dear valued Stakeholder,

We recently contacted you to ask your opinion on the design principles of our current airspace change proposal ACP-2021-088.

Following the initial email we have received a number of responses that have been used to inform and develop the draft design principles. To capture this we have prepared a summary of the stakeholder engagement and the draft design principles, which will be submitted to the CAA for their consideration. Please find attached a copy of this for your interest.

Kind Regards,

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### RE: English Channel airspace change proposal (ACP-2021-088)

Tue 12/07/2022 13:12

To:

- Airspace Change Proposal <airspacechangeproposal@bristowgroup.com>

Cc:

- [Redacted];
- [Redacted] k>

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Good Afternoon,





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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,



**NATS**

NATS Policy  
Ops and Integration for NATS Airports



NATS Swanwick

[www.nats.co.uk](http://www.nats.co.uk)



NATS  
[Redacted]

Sent: 11 [Redacted] 13:30

To: Airspace Change Proposal <airspacechangeproposal@bristowgroup.com>; [Redacted]

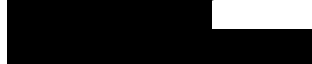
[Redacted]

Subject: RE: English Channel airspace change proposal (ACP-2021-088)

Good afternoon,  
My colleague is reviewing this and will respond to you once they return to work on Wednesday (13th).  
Rgds



Manager NATS Operational Policy





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NATS Internal

**From:** Airspace Change Proposal <[airspacechangeproposal@bristowgroup.com](mailto:airspacechangeproposal@bristowgroup.com)>

**Sent:** 11 July 2022 13:22

**To:** [REDACTED]

**Subject:** [EXTERNAL] Re: English Channel airspace change proposal (ACP-2021-088)

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Dear valued Stakeholder,

We sent you a copy of the Design Principles we are preparing to submit to the CAA. Do you have any follow-on comments regarding the amended design principles?

Kind Regards,

## Bristow Search & Rescue

Dyce Avenue  
Dyce, Aberdeen  
AB21 0LQ

**From:** Airspace Change Proposal <[airspacechangeproposal@bristowgroup.com](mailto:airspacechangeproposal@bristowgroup.com)>

**Sent:** 07 July 2022 22:21

**To:** [REDACTED]

**Subject:** English Channel airspace change proposal (ACP-2021-088)

Dear valued Stakeholder,





Maritime &  
Coastguard  
Agency



We recently contacted you to ask your opinion on the design principles of our current airspace change proposal ACP-2021-088.

Following the initial email we have received a number of responses that have been used to inform and develop the draft design principles. To capture this we have prepared a summary of the stakeholder engagement and the draft design principles, which will be submitted to the CAA for their consideration. Please find attached a copy of this for your interest.

Kind Regards,

### **Bristow Search & Rescue**

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## Re: English Channel airspace change proposal (ACP-2021-088)

Airspace Change Proposal <[airspacechangeproposal@bristowgroup.com](mailto:airspacechangeproposal@bristowgroup.com)>

Thu 14/07/2022 08:02

To:

•

Good

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

Best Regards,

[Redacted]

From: [Redacted] >

Sent: 11 July 2022 13:33

To: Airspace Change Proposal <[airspacechangeproposal@bristowgroup.com](mailto:airspacechangeproposal@bristowgroup.com)>

Cc: [Redacted]

Subject: RE: English Channel airspace change proposal (ACP-2021-088)

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Good afternoon,





Maritime &  
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**From:** Airspace Change Proposal <[airspacechangeproposal@bristowgroup.com](mailto:airspacechangeproposal@bristowgroup.com)>

**Sent:** 07 July 2022 22:28

**To:** [REDACTED]

>

**Subject:** English Channel airspace change proposal (ACP-2021-088)

Dear valued Stakeholder,

We recently contacted you to ask your opinion on the design principles of our current airspace change proposal ACP-2021-088.

Following the initial email we have received a number of responses that have been used to inform and develop the draft design principles. To capture this we have prepared a summary of the stakeholder engagement and the draft design principles, which will be submitted to the CAA for their consideration. Please find attached a copy of this for your interest.

Kind Regards,

### **Bristow Search & Rescue**

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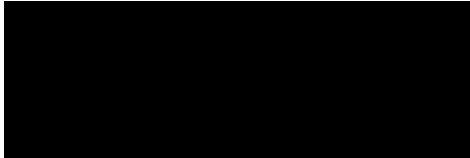


**Re: ACP-2021-088 - English Channel SAR Operations**

Airspace Change Proposal <airspacechangeproposal@bristowgroup.com>

Thu 14/07/2022 08:27

To:



Good

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,



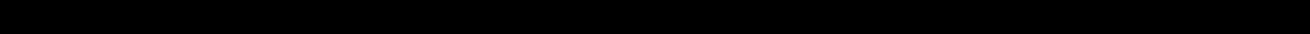
From:



Sent: 13 July 2022 10:41

To: Airspace Change Proposal <airspacechangeproposal@bristowgroup.com>

Cc:



Subject: Re: ACP-2021-088 - English Channel SAR Operations

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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



Dover and Folkestone Hang Gliding Club



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**From:** Airspace Change Proposal <airspacechangeproposal@bristowgroup.com>

**Sent:** 12 July 2022 21:57

**To:** [REDACTED]

**Subject:** RE: ACP-2021-088 - English Channel SAR Operations

Good evening [REDACTED],

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,

[REDACTED]

**Bristow Search & Rescue**

Dyce Avenue  
Dyce, Aberdeen  
AB21 0LQ

[REDACTED]



[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]





Maritime &  
Coastguard  
Agency



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



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---

**Re: English Channel airspace change proposal (ACP-2021-088)**

Airspace Change Proposal <airspacechangeproposal@bristowgroup.com>

Thu 14/07/2022 09:28

To:

•

Good

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,

From:

Sent: 13 July 2022 05:34

To: Airspace Change Proposal <airspacechangeproposal@bristowgroup.com>

Cc:

Subject: Re: English Channel airspace change proposal (ACP-2021-088)

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

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.



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Best regards

[REDACTED]  
BMAA Airspace Team lead

Sent from my iPad

On 12 Jul 2022, at 21:49, Airspace Change Proposal <airspacechangeproposal@bristowgroup.com> wrote:

Evening [REDACTED],

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,

[REDACTED]  
**Bristow Search & Rescue**

Dyce Avenue  
Dyce, Aberdeen





Maritime &  
Coastguard  
Agency



*Global Leader in Vertical Flight.*

**From:** [REDACTED]  
**Sent:** 11 July 2022 13:46  
**To:** Airspace Change Proposal <airspacechangeproposal@bristowgroup.com>  
**Cc:** [REDACTED]  
**Subject:** RE: English Channel airspace change proposal (ACP-2021-088)

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

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

[REDACTED]  
BMAA Airspace Team lead



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**From:** Airspace Change Proposal <[airspacechangeproposal@bristowgroup.com](mailto:airspacechangeproposal@bristowgroup.com)>

**Sent:** 07 July 2022 23:10

**To:** [REDACTED]

**Subject:** English Channel airspace change proposal (ACP-2021-088)

Dear valued Stakeholder,

We recently contacted you to ask your opinion on the design principles of our current airspace change proposal ACP-2021-088.

Following the initial email we have received a number of responses that have been used to inform and develop the draft design principles. To capture this we have prepared a summary of the stakeholder engagement and the draft design principles, which will be submitted to the CAA for their consideration. Please find attached a copy of this for your interest.

Kind Regards,

### **Bristow Search & Rescue**

Dyce Avenue  
Dyce, Aberdeen  
AB21 0LQ



*Global Leader in Vertical Flight.*

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---

### **Fw: Re ACP**

Airspace Change Proposal <[airspacechangeproposal@bristowgroup.com](mailto:airspacechangeproposal@bristowgroup.com)>



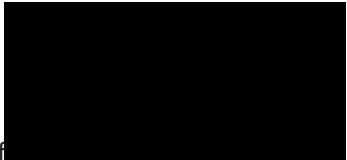


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Thu 14/07/2022 14:57

To:



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. 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.

Kind Regards,



From:



Sent: 14 July 2022 12:43

To: Airspace Change Proposal <airspacechangeproposal@bristowgroup.com>

Subject: FW: Re ACP

Kind Regards,



**Bristow Search & Rescue**

Dyce Avenue  
Dyce, Aberdeen  
AB21 0LQ





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**From:** [REDACTED]

**Sent:** 14 July 2022 13:16

**To:** [REDACTED]

**Subject:** Re ACP

**CAUTION:** [REDACTED] mail originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Mr [REDACTED]

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

[REDACTED]

--  
[REDACTED]



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[#FLY2022](#) - Join *FLYER* with our campaign to encourage pilots to fly 2,022+ minutes this year. Post your photos on social media, send us your flying adventures, and get support!

---

**RE: ACP-2021-088 OBJECTION**

Airspace Change Proposal <airspacechangeproposal@bristowgroup.com>

Tue 12/07/2022 21:05

To:

- [Redacted]
- [Redacted] <airspacechangeproposal@bristowgroup.com>

Cc:

- [Redacted] Airspace Policy <Airspace.Policy@caa.co.uk>

Evening [Redacted],





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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,

**Bristow Search & Rescue**

Dyce Avenue  
Dyce, Aberdeen  
AB21 0LQ



*Global Leader in Vertical Flight.*

**From:** [Redacted]  
**Sent:** 12 July 2022 10:33  
**To:** Airspace Change Proposal <airspacechangeproposal@bristowgroup.com>  
**Cc:** Airspace Policy <Airspace.Policy@caa.co.uk>  
**Subject:** ACP-2021-088 OBJECTION

[Redacted] e organization. Do not click links or open attachments unless you

**OBJECTION**





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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.

Sent from my Galaxy

---

## RE: English Channel Airspace Requirements ACP 2021 088

Airspace Change Proposal <airspacechangeproposal@bristowgroup.com>

Tue 12/07/2022 21:54

To:

- [Redacted]
- [Redacted] <airspacechangeproposal@bristowgroup.com>

Cc:

- [Redacted] >

Hi [Redacted]

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

Kind Regards,

[Redacted]

### Bristow Search & Rescue

Dyce Avenue  
Dyce, Aberdeen  
AB21 0LQ



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**From:** [REDACTED]  
**Sent:** 12 July 2022 22:22  
**To:** Airspace Change Proposal <[airspacechangeproposal@bristowgroup.com](mailto:airspacechangeproposal@bristowgroup.com)>  
**Cc:** [REDACTED]  
**Subject:** RE: English Channel Airspace Requirements ACP 2021 088

**CAUTION:** This email originates from [REDACTED] outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Thank you for your response D [REDACTED] 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



On 12 Jul 2022, 21:59 +0100, Airspace Change Proposal <[airspacechangeproposal@bristowgroup.com](mailto:airspacechangeproposal@bristowgroup.com)>, wrote:

Good evening [REDACTED],

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.





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Kind Regards,

**Bristow Search & Rescue**

Dyce Avenue  
Dyce, Aberdeen  
AB21 0LQ



*Global Leader in Vertical Flight.*

**From:** [REDACTED]  
**Sent:** 12 July 2022 16:28  
**To:** Airspace Change Proposal <[airspacechangeproposal@bristowgroup.com](mailto:airspacechangeproposal@bristowgroup.com)>  
**Cc:** [REDACTED]  
**Subject:** English Channel Airspace Requirements ACP 2021 088

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

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



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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

<image002.png>

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



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---

**RE: Airspace Change ACP-2021-088**

Airspace Change Proposal <airspacechangeproposal@bristowgroup.com>

Wed 13/07/2022 08:36





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**Bristow**  
Search and Rescue

To:

[Redacted]

[Redacted]

Mornin

Absolutely, we welcome this input. We would be very grateful for a list of local farm strips and there 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.

Kind Regards,

[Redacted]

**Bristow Search & Rescue**

Dyce Avenue  
Dyce, Aberdeen  
AB21 0LQ

[Redacted]



*Global Leader in Vertical Flight.*

From:

[Redacted]

Sent: 13 July 2022 07:44

To: Airspace Change Proposal <airspacechangeproposal@bristowgroup.com>

Cc:

[Redacted]

Subject: RE: Airspace Change ACP-2021-088

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Good morning [REDACTED],

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

Regards

**From:** Airspace Change Proposal <[airspacechangeproposal@bristowgroup.com](mailto:airspacechangeproposal@bristowgroup.com)>

**Sent:** 12 July 2022 21:51

**To:** [REDACTED]; Airspace Change Proposal  
<[airspacechangeproposal@bristowgroup.com](mailto:airspacechangeproposal@bristowgroup.com)>

**Cc:** [REDACTED]

**Subject:** RE: Airspace Change ACP-2021-088

Good evening [REDACTED],

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,

**Bristow Search & Rescue**

Dyce Avenue  
Dyce, Aberdeen  
AB21 0LQ



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*Global Leader in Vertical Flight.*

**From:** [REDACTED]  
**Sent:** 11 July 2022 14:20  
**To:** Airspace Change Proposal <[airspacechangeproposal@bristowgroup.com](mailto:airspacechangeproposal@bristowgroup.com)>  
**Cc:** [REDACTED]  
**Subject:** Airspace Change ACP-2021-088

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

Good afternoon,

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

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.

Regards

[REDACTED]

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## Re: Airspace Change AO-2021-088

Thu 14/07/2022 09:58

To:

- Airspace Change Proposal <airspacechangeproposal@bristowgroup.com>

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

Good morning [REDACTED]

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  
[REDACTED]

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

From: Airspace Change Proposal <airspacechangeproposal@bristowgroup.com>

To: [REDACTED] Airspace Change Proposal

<airspacechangeproposal@bristowgroup.com>

Sent: Wed, 13 Jul 2022 23:59

Subject: RE: Airspace Change AO-2021-088

Good evening [REDACTED],

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.



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*Global Leader in Vertical Flight.*

**From:** [Redacted]  
**Sent:** 13 July 2022 18:03  
**To:** Airspace Change Proposal <airspacechangeproposal@bristowgroup.com>  
**Subject:** Airspace Change AO-2021-088

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

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, Clippgate, 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





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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

[Redacted signature]

[Redacted contact information]

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## 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	
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	
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	
Swanborough 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	
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] ( Local Airfield Operator)	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



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## **Annex B - Letter: Stakeholder Engagement Document English Channel Stage 1 Define**



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### **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



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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](https://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 <sup>1</sup>	04-Apr-22	29-Apr-22	08-Jul-22	29-Jul-22
DEVELOP & ASSESS Gateway <sup>1</sup>	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 1<sup>st</sup> 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](https://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](mailto:airspacechangeproposal@bristowgroup.com). You can also see up-to-date information on the process at [airspacechange.caa.co.uk](https://airspacechange.caa.co.uk)

#### 7. Next Steps



Maritime &  
Coastguard  
Agency



Up until 26<sup>th</sup> 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 29<sup>th</sup> 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 is 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



Maritime &  
Coastguard  
Agency



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](mailto: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.		



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## 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



Maritime &  
Coastguard  
Agency



- 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





Maritime &  
Coastguard  
Agency



- 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](mailto:airspacechangeproposal@bristowgroup.com)