# Summary of Stakeholder Engagement

# ACP-2022-011

**17th August 2022**

**CONFIDENTIAL**

## 1. INTRODUCTION

Flylogix are an unmanned aircraft service provider, focused on the offshore energy sector. Flylogix have been contracted to complete methane emission surveys of oil and gas platforms over the Southern North Sea in 2022. These surveys will be achieved by using an unmanned aircraft with a methane sensor fitted to it. The operations will be conducted in a Temporary Danger Area (TDA).

Flylogix have submitted an airspace change request (ACP-2022-011) to establish this TDA. This document is a summary of the stakeholder engagement carried out by Flylogix in relation to this ACP.

## 2. OBJECTIVES OF ENGAGEMENT AND THIS DOCUMENT

Flylogix engaged with aviation stakeholders (airspace users, air navigation service providers and aerodromes) on the safety and operational viability of the proposed TDA with the aim of informing stakeholders and addressing any issues or impact that may arise from the TDA being established.

This document provides a summary of the process, results and any subsequent changes to the proposed TDA.

The supporting document sent to all stakeholders and a record of communications can be found in the appendices.

## 3. LIST OF STAKEHOLDERS

The table below is a list of the stakeholders contacted and reason for their engagement.

| Organisation | Name | Reason for including in engagement |
|---|---|---|
| NATS | [redacted] | ANSP |
| | | ANSP |
| | | ANSP |
| | | ANSP |
| | | ANSP |
| JRCC | | Coastguard body that task SAR helicopters |
| Bristow SAR | | Operate SAR helicopters |
| Offshore Helicopter | | Oil and gas helicopter operator in North Sea |
| NHV | | Oil and gas helicopter operator in North Sea |
| CHC | | Oil and gas helicopter operator in North Sea |
| Bristow | | Oil and gas helicopter operator in North Sea |
| Airtask | | Commercial operator flying over the North Sea |

| | | |
|---|---|---|
| DAATM | [redacted] | Coordinate UK military response |
| Babcock Mission Critical Onshore | | Helicopter operator |
| 2Excel aviation | | Commercial operator flying over the North Sea |
| Unifly | | Wind energy helicopter operator in North Sea |
| GAA | | An independent group and partnership of organisations representing UK General Aviation |
| Airspace4All | | A joint undertaking between Sports and Recreational Aviation, Military Aviation and Other Aviation stakeholders |
| AOPA | | Non-profit political organization that advocates for general aviation |
| Hollym airfield | | Private airfield where UA will operate from |
| Garton airfield | | Private airfield near TDA |
| Humberside airport | [redacted] | Commercial airfield where oil and gas helicopters operate |
| Norwich airport | [redacted] | Commercial airfield where oil and gas helicopters operate |
| Airport Operators Association (AOA) | | NATMAC member |
| Airfield Operators Group (AOG) | | NATMAC member |
| Airspace Change Organising Group (ACOG) | | NATMAC member |
| ARPAS-UK | | NATMAC member |
| Aviation Environment Federation (AEF) | | NATMAC member |
| British Airways (BA) | | NATMAC member |
| BAe Systems | | NATMAC member |
| British Airline Pilots Association (BALPA) | | NATMAC member |
| British Airline Pilots Association (BALPA) | | NATMAC member |
| British Balloon and Airship Club | | NATMAC member |
| British Business and General Aviation Association (BBGA) | | NATMAC member |
| British Gliding Association (BGA) | | NATMAC member |
| British Helicopter Association (BHA) | | NATMAC member |
| British Hang Gliding and Paragliding Association (BHPA) | | NATMAC member |
| British Microlight Aircraft Association (BMAA) | | NATMAC member |
| | | NATMAC member |
| British Model Flying Association (BMFA) | | NATMAC member |
| British Skydiving | | NATMAC member |
| Drone Major | | NATMAC member |
| Guild of Air Traffic Control Officers (GATCO) | | NATMAC member |

| | | |
|---|---|---|
| Honourable Company of Air Pilots (HCAP) | [redacted] | NATMAC member |
| Helicopter Club of Great Britain (HCGB) | | NATMAC member |
| Heavy Airlines | | NATMAC member |
| Iprosurv | | NATMAC member |
| Isle of Man CAA | | NATMAC member |
| Light Aircraft Association (LAA) | | NATMAC member |
| Low Fare Airlines | | NATMAC member |
| Military Aviation Authority (MAA) | | NATMAC member |
| Ministry of Defence - Defence Airspace and Air Traffic Management (MoD DAATM) | | NATMAC member |
| Navy Command HQ | | NATMAC member |
| PPL/IR (Europe) | | NATMAC member |
| PPL/IR (Europe) | | NATMAC member |
| UK Airprox Board (UKAB) | | NATMAC member |
| UK Flight Safety Committee (UKFSC) | | NATMAC member |
| United States Air Force Europe (3rd Air Force-Directorate of Flying (USAFE (3rd AF-DOF)) | | NATMAC member |
| Rob Wendes | | GA pilot who asked to be involved |
| Wiking | | Wind energy helicopter operator in North Sea |

# 4. SUMMARY OF ENGAGEMENT METHODOLOGY AND TIMELINE

The strategy of this engagement is outlined in *Stakeholder engagement strategy ACP-2022-011* which was submitted to the CAA and uploaded to the Airspace Change Portal. This document along with other materials related to the ACP can be found via searching for ACP-2022-011 at the following web address [redacted]

## 4.1 Engagement Methodology

Flylogix has completed BVLOS UA flights over the North Sea since 2019, including operations in the Southern North Sea, and engaged with other air users when planning and completing these operations. This prior engagement provided a provisional audience list. This was used as a starting point for the engagement and additional stakeholders were identified through inspecting aviation charts to look for local airfields, discussion with the CAA and consideration of the NATMAC list of organisations/stakeholders.

Once a list of stakeholders was compiled, the approach was to engage directly with individuals at the organisations by email.

All stakeholders were sent an email (Appendix 1) with an attachment (Appendix 2) on 1st July 2022. Furthermore those stakeholders who had not replied were sent

- A chaser email on 20th July informing them that the engagement was at the halfway point
- A further email on Wednesday 10th August informing them that the engagement closed on Friday 12th.

These emails are included in Appendix 2

## 4.2 Stakeholders who have not been informed of operations

In line with the Stakeholder Engagement plan Local Residents were not engaged for the following reasons

i. The airspace design does not impact the how the UA will operate at Hollym, where it will fly VLOS before heading over the sea.

ii. The airfield is adjacent to the coast and the UA will not overfly any land outside the airfield.

iii. The unmanned aircraft will be at 800ft when operating over land. At this altitude it creates little noise and adds only ~8dBA to background noise (based on Flylogix testing). This is below the 10dBA considered a nuisance in noise regulation.

# 5. SUMMARY OF FEEDBACK

## 5.1 Stakeholders who replied with feedback or objections

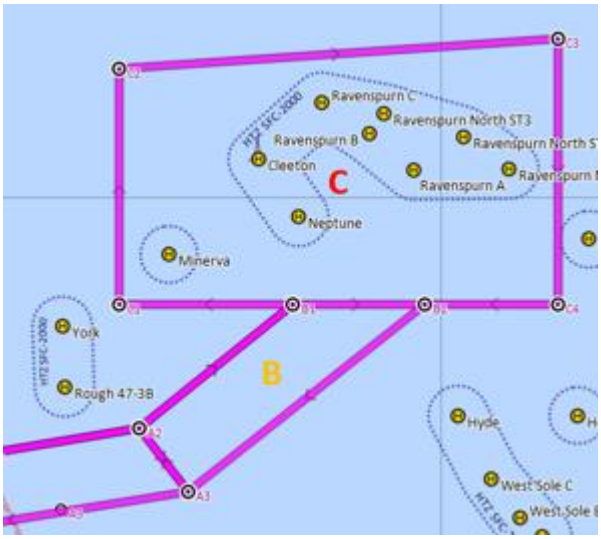
There were six stakeholders who replied with feedback, comments or objections. They were

1. NHV
2. 2Excel
3. Norwich airport
4. British Helicopter Association
5. British Microlight Association
6. [redacted]

### 5.1.1 NHV

NHV are a commercial helicopter operator and replied stating that they operate to the York platform – typically taking staff to the platform at 0900 and back at approximately 1600.

The York platform is situated outside the proposed TDA – to the SW of Segment C of proposed TDAyyy. The platform is approximately 3 miles from the TDA.




Flylogix called NHV to discuss the feedback further. This discussion was summarised in an email which is included in Appendix 3.1

The agreement from the discussion were

- NHV are flying to a schedule which they have a month in advance and would be happy to share, allowing Flylogix to avoid activating the TDA at times when operations are planned.
- The platform is out of the TDA, but segments B and C could impact the approach
- That icing conditions could cause the helicopter to operate below the usual 2,000ft, potentially bringing them into or close to the TDA. The DACs provided by Anglia Radar limits this risk though as they will not allow the UA to operate if helicopters are flying at the altitude of the TDA to avoid ice.
- The DACs reduces the chance to NHV not being to reach the York platform
- Flylogix agreed to notify NHV of operations in advance by email
- NHV are happy with the current design if the above actions are followed

**Actions taken/to be taken following feedback**

- No change to proposed TDA design
- Flylogix to request schedule for flights to York platform from NHV in advance of operations and plan operations to avoid activating TDA at time of planned flights
- Flylogix to notify NHV of activations of TDA in advance by email

### 5.1.2 2Excel

2Excel highlighted in their reply that the TDA was near but not clashing with TENDO which is used for Oil Dispersant Delivery training. This activity is NOTAMed and Flylogix agreed to inspect the NOTAMs and consult with 2Excel in the event of Dispersant training and a UA flight being planned at the same time.

**Actions taken/to be taken following feedback**

- No change to proposed TDA design
- Flylogix to check NOTAM before each activation for dispersant operations

### 5.1.3 Norwich Airport

Norwich Airport notified that they had no concerns about the TDA design but asked if the UA would have a dedicated squawk, that was published in the AIC. Flylogix replied that in in previous operation 7000 had been used but we would ask Anglia Radar if they could assign a squawk.

**Actions taken/to be taken following feedback**

- No change to proposed TDA design
- Flylogix to ask Anglia radar about having a dedicated squawk

### 5.1.4 British Helicopter Association

BHA suggested that Uni-fly and Wiking were included in the engagement. Uni-fly had already been contacted and Wiking were added to the engagement.

**Actions taken/to be taken following feedback**

- No change to proposed TDA design
- Flylogix have added Wiking to the engagement

### 5.1.5 British Microlight Aircraft Association

The BMAA gave the feedback that the majority of the TDA would have no impact on their operations as it was offshore. They highlighted that an aircraft following the coast would fly just offshore if flying North and would likely be between 500 and 1500ft. They questioned if the ceiling of the inshore section of the TDA could be reduced to reduce this impact.

**Actions taken/to be taken following feedback**

- Flylogix to review ceiling of inshore TDA design (Section **Error! Reference source not found.**)

### 5.1.6 [redacted]

[redacted] is a GA pilot based in Surrey who asked to be included in the ACP Engagement. He filed an objection to the proposed TDA. The full correspondence is included in Appendix 3.1

The points raised by Mr Wendes were

1. Documents on Airspace Change Portal not up to date
2. No safety case presented

3. TDA is a barrier to other aircraft who are flying low in the area

4. Certified BVLOS UA would avoid the requirement for TDA

5. In a second email raised point that IFR is a parallel to BVLOS. Manned aircraft must meet airworthiness requirements and be suitably equipped to fly IFR. A suitably equipped UA flied by a qualified IFR pilot would be able to fly as a manned aircraft does under IFR.

**Response/Actions following feedback**

1. Flylogix will update the Airspace Change Portal with redacted versions of all documents

2. In a previous ACP Flylogix have hosted [redacted] at our offices and shown him the aircraft, ground control station and explained ou [redacted] It is not possible to share the complete OSC as he asks as it includes intellectual property.

3. The TDA could be a barrier to an aircraft flying low in the area who was unable to climb for some reason. This risk is limited by

    a. The DACs that would allow other air users to enter the TDA in an emergency

    b. Minimising the ceiling of the TDA

    c. The low traffic density of aircraft operating below 1,000ft over the North Sea.

    Based on this feedback Flylogix have reviewed the ceiling of the TDA (Section **Error! Reference source not found.**)

4. There is currently no certification or Acceptable Means of Compliance in the UK for UA of the size of Flylogix's aircraft, flying BVLOS. So, it is not possible to certify the aircraft.

5. CAP 722 gives three ways that BVLOS operations can be completed

    a. By showing a Detect and Avoid system that is equivalent to See and Avoid

    b. By segregating the operation

    c. By showing the operation has no aviation risk

    The IFR equivalence approach suggested by is not an approved method for basing a safety case for BVLOS operations.

## 5.2 Stakeholders who replied but had no feedback or objections

The following stakeholders replied saying they had no feedback on the TDA design or ACP. The full correspondence is included in Appendix 3.2

1. NATS

2. JRCC

3. Offshore Helicopters Limited

4. DAATM

5. Babcock Mission Critical Onshore

6. Unifly

7. Hollym airfield
8. Airfield Operators Group
9. ARPAS – UK
10. British Gliding Association

## 5.3 Stakeholders where no reply received

The remaining stakeholders did not reply to the request for feedback. In addition to the initial email on 1st July requesting feedback and sending the Engagement Material, reminders were sent to those who had not yet replied on

- 20th July – near the halfway stage of engagement
- 10th August – two days before the close of the engagement

This communication is included in Appendix 1 and Appendix 2

# 6. CONCLUSION AND CHANGES

## 6.1 Change to TDA ceiling

Following feedback from the BMAA and [redacted] Flylogix reviewed the ceiling height for the proposed TDA. The initial proposal was 1,300ft.

The UA begins the methane survey at 600ft, to ensure the survey starts sufficiently above the oil and gas platform to sense the methane. During transit there is more flexibility in altitude – but surveillance coverage will be better maintained above 500ft and large vessels or cranes etc. with an altitude of less than 500ft will not be NOTAMed. Therefore, an altitude of 600ft will be used for the transit.

There needs to be a buffer above the UA in transit to ensure the UA does not accidentally leave the TDA. In order to give the flight crew a chance to in the event of the UA climbing unexpectedly this buffer will be 400ft. Other aircraft can then choose their own distance above the TDA to give vertical separation they require.

The ceiling of the TDA has therefore been modified to 1,000ft in light of the feedback.

## 6.2 Notification and procedures

Flylogix will complete the actions below

- Flylogix will contact NHV in the weeks before the operation to get a schedule of flights to the York Platform and then plan activation of the TDA to avoid these times
- Flylogix will ask Anglia Radar about the possibility of a dedicated squawk for the operations
- Flylogix will update the Airspace Change Portal

- Flylogix will contact Anglia Radar by telephone or email to confirm they can provide a Danger Area Crossing Service before issuing a NOTAM to activate the TDA.

## 6.3 Impact on flight paths below 7000ft and over inhabited areas

There will be little to no impact on the flight path or volume of air traffic flying below 7000ft over inhabited areas. This is due to the following reasons:

1. The TDA onshore is established from surface to 1,000ft. Therefore, the majority of aircraft below 7,000ft can fly over the TDA. The volume of traffic in the operating area is mostly comprised of commercial traffic flying offshore, with some GA following the coast:

2. The TDA does not extend over the land and therefore minimises impact on inhabited areas.

3. Based on a study conducted by Flylogix, noise caused by the UA when cruising at 800ft adds approximately 8Db to background noise. This is below the 10dBA considered a nuisance in noise regulation.

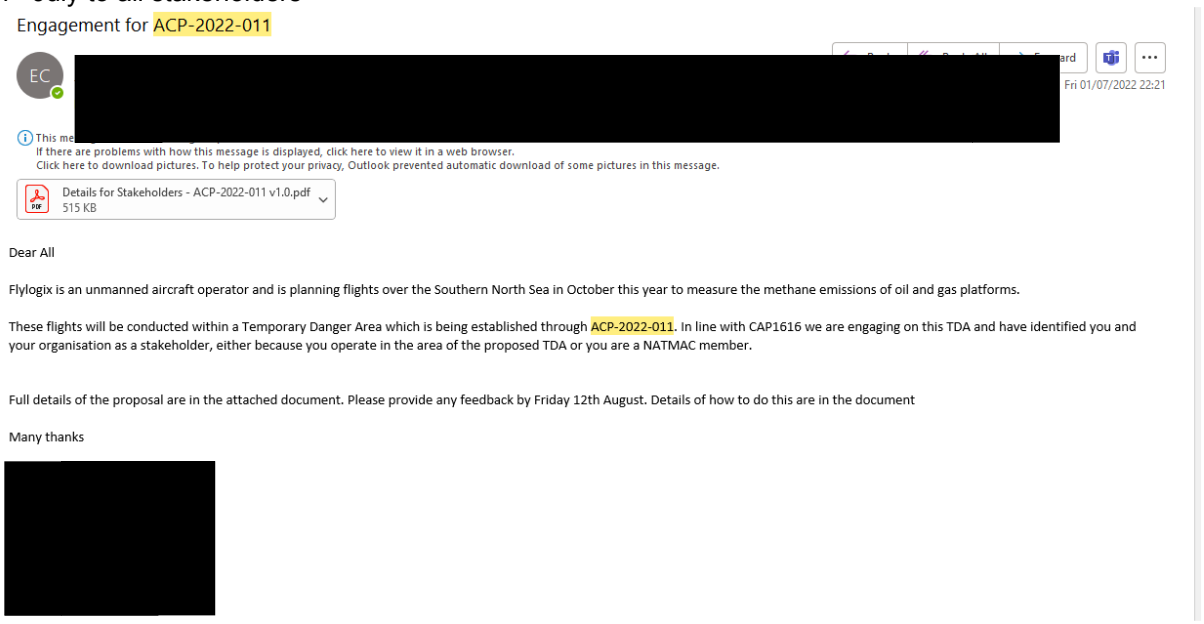
## 6.4 Collection and monitoring of feedback and complaints while the TDA is active

It shall be the responsibility of [redacted] as Flylogix Flight Operations Manager, to gather all feedback received when the TDA is in place. All stakeholders in this document have the contact details for Flylogix operations staff and there will be contact details for Flylogix in the AIC notifying the TDA and on the NOTAM.

Once the operation is complete and the TDA ended, any feedback collected during this period shall be compiled into a summary report and forwarded to the CAA for review.

# APPENDIX 1 ENGAGEMENT EMAILS

## 1st July to all stakeholders



Engagement for ACP-2022-011

EC [redacted] Fri 01/07/2022 22:21

This me
If there are problems with how this message is displayed, click here to view it in a web browser.
Click here to download pictures. To help protect your privacy, Outlook prevented automatic download of some pictures in this message.

Details for Stakeholders - ACP-2022-011 v1.0.pdf
515 KB

Dear All

Flylogix is an unmanned aircraft operator and is planning flights over the Southern North Sea in October this year to measure the methane emissions of oil and gas platforms.

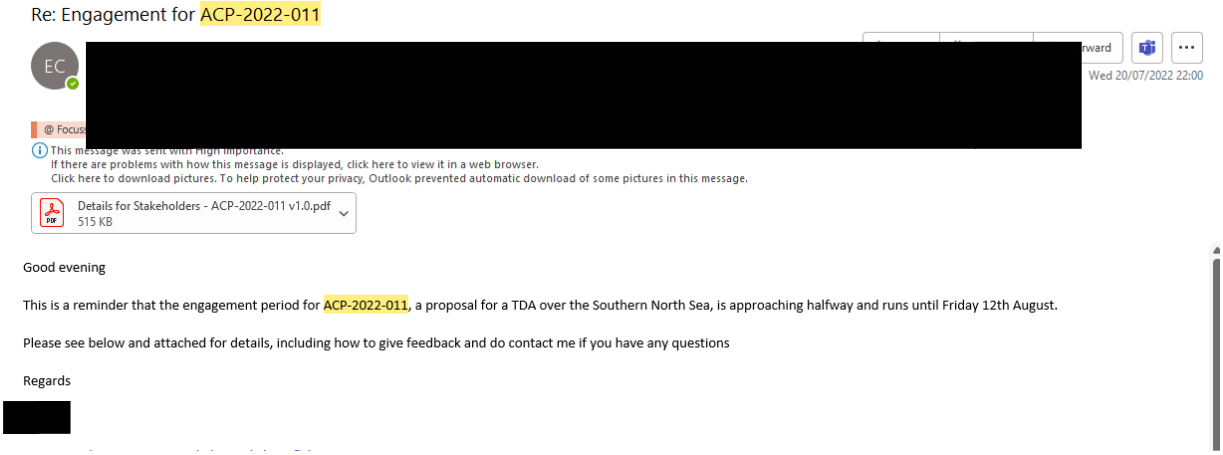
These flights will be conducted within a Temporary Danger Area which is being established through ACP-2022-011. In line with CAP1616 we are engaging on this TDA and have identified you and your organisation as a stakeholder, either because you operate in the area of the proposed TDA or you are a NATMAC member.

Full details of the proposal are in the attached document. Please provide any feedback by Friday 12th August. Details of how to do this are in the document

Many thanks

[redacted]

## 20th July to those who had not replied



Re: Engagement for ACP-2022-011

EC [redacted] Wed 20/07/2022 22:00

@ Focus
This message was sent with High importance.
If there are problems with how this message is displayed, click here to view it in a web browser.
Click here to download pictures. To help protect your privacy, Outlook prevented automatic download of some pictures in this message.

Details for Stakeholders - ACP-2022-011 v1.0.pdf
515 KB

Good evening

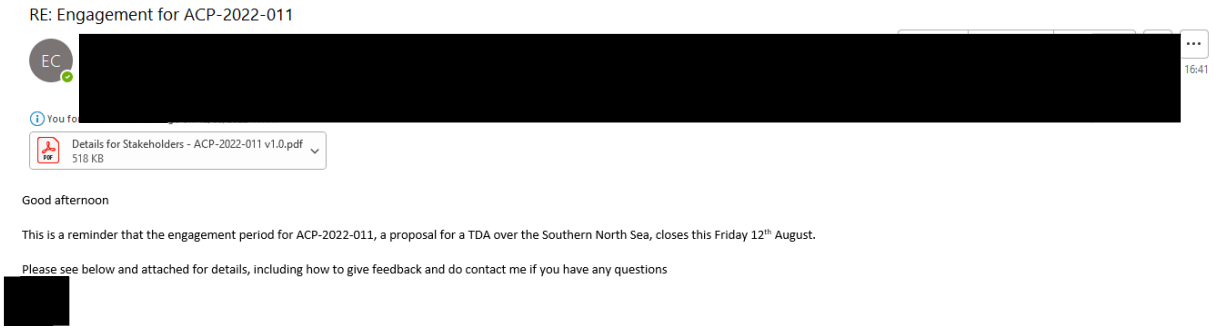
This is a reminder that the engagement period for ACP-2022-011, a proposal for a TDA over the Southern North Sea, is approaching halfway and runs until Friday 12th August.

Please see below and attached for details, including how to give feedback and do contact me if you have any questions

Regards

[redacted]

## 10th August to those who had not replied



RE: Engagement for ACP-2022-011

EC [redacted] 16:41

You fo

Details for Stakeholders - ACP-2022-011 v1.0.pdf
518 KB

Good afternoon

This is a reminder that the engagement period for ACP-2022-011, a proposal for a TDA over the Southern North Sea, closes this Friday 12th August.

Please see below and attached for details, including how to give feedback and do contact me if you have any questions

[redacted]

# Stakeholder engagement for TDA over Southern North Sea

## ACP-2022-011

**July 2022**

## 1. INTRODUCTION

Flylogix are an Unmanned Aircraft (UA) service provider, focused on the offshore energy sector. Flylogix have been contracted for up to 10 UAS flights in the Southern North Sea from October 2022.

The operations will be conducted in a Temporary Danger Area (TDA) complex. Flylogix have begun an airspace change request (ACP-2022-011) to establish this TDA.

## 2. OBJECTIVES OF ENGAGEMENT AND THIS DOCUMENT

In line with the CAP1616 Flylogix are engaging with aviation stakeholders to get feedback on the safety and operational impact of the proposed TDA. This engagement will occur between 1st July 2022 and 15th August 2022 and all feedback will be shared with the CAA as part of the final TDA submission.

This document has been sent to the following stakeholders for feedback. More stakeholders may be contacted as Flylogix becomes aware of them and please inform us of any stakeholders who should be added to the engagement

- ANSP - NATS (Anglia Radar)
- Oil and Gas helicopter operators – CHC, NHV, Bristow, Babcock
- SAR – JRCC, Bristow SAR
- Commercial operators working in area – Airtask, 2Excel Aviation, Babcock Mission Critical Services Onshore, Unifly
- General Aviation – Airspace4All, General Aviation Alliance, AOPA
- MOD – DAATM
- Aerodromes – Norwich Airport, Humberside Airport, Hollym airfield, Garton airfield
- The members of NATMAC

## 3. TYPE OF OPERATION

The operations are unmanned BVLOS flights conducted within a TDA. The purpose of the flights is to conduct methane surveys of offshore oil and gas platforms

The UA will transit at an altitude of 500ft or 800ft AMSL While conducting methane surveys around an asset, the UA will operate between 150ft and 600ft AMSL.

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## 4. UNMANNED AIRCRAFT CHARACTERISTICS


**Figure 1 - The FX2 type UAS**

The UA is a single propeller, fixed wing aircraft. The characteristics of the UA are summarised below:

| Characteristic | Value |
|---|---|
| Type | Fixed wing, single engine, tractor propeller |
| Wingspan | 3.48m |
| Length | 2.74m |
| MTOM | 52.1 kg |

Flylogix is in the process of securing exemptions from the CAA for these operations. As part of the Operational Safety Case (OSC) submitted to the CAA, the following operating limitations will apply:

| Flylogix Operating Conditions |
|---|
| Daylight only |
| <25 knots average windspeed at 10m (approx. ground level) |
| Visibility greater than 5Km |
| Cloud base 300ft above maximum altitude for flight |
| Temperature above 0ºC and below 40ºC at ground level |
| Less than 5mm/hr precipitation |
| No lightning forecasted or occurring |

The UA will be fitted with ADS-B in and out and a Mode-S transponder. If the transponder is non-functioning, the mission will be cancelled/aborted.

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# 5. TDA

## 5.1 Design Principals

To limit the impact of the TDA complex on other air users, Flylogix applies the following design principals:

- Minimise the volume of airspace, including both footprint and altitude
    - Where required this means multiple smaller TDAs rather than a single large TDA
- Minimise, and if possible, avoid the TDA covering land and the coast. To facilitate this the UA is operated from the coast and flown Visual Line of Sight for take-off and landing – entering the TDA before going BVLOS over the water
- Avoid areas where other aircraft operate below 1,500ft – for example airfields and HTZs
- Segment each TDA to simplify the Danger Area Crossing Service
- Only activate the TDA for the period of the flight

## 5.2 Proposed Design

The proposed design is for 2 TDAs, to allow operations to be conducted in the Cygnus and Ravensprun fields. Only one TDA will be activated at a time.

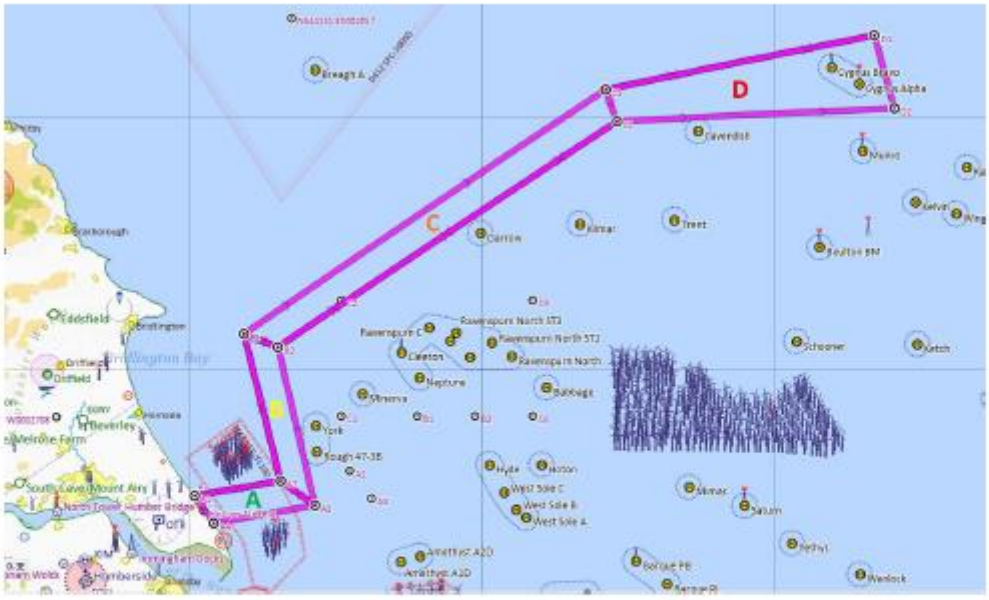


**Figure 1 –Proposed TDAxxx with 4 segments A to D – All segments surface to 1,300ft AMSL**

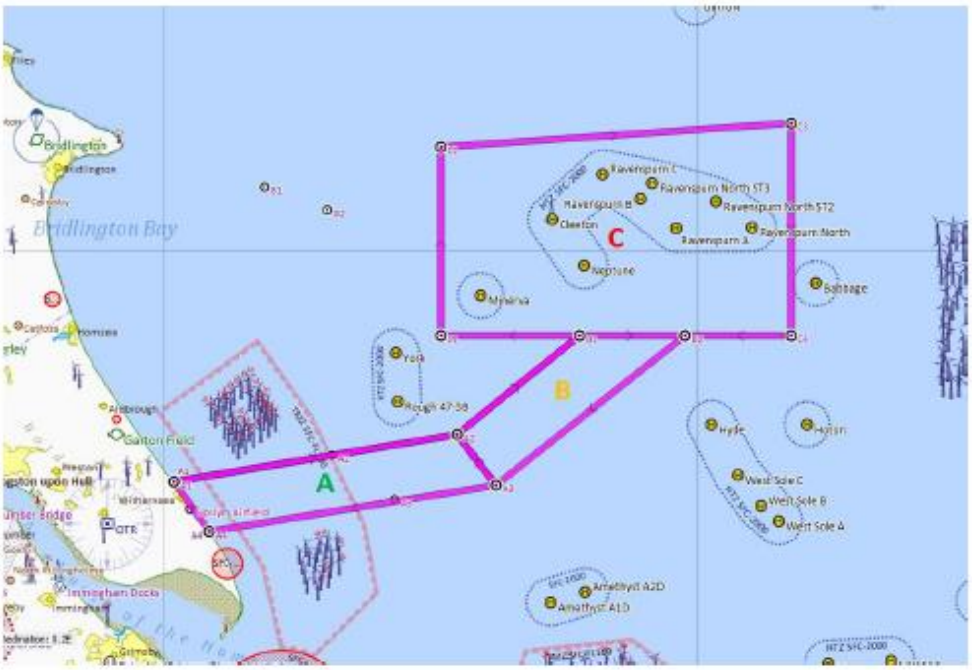


**Figure 2 - Proposed TDAyyy with 3 segments A to C - All segments surface to 1,300ft AMSL**

- Full coordinates for the proposed TDA complex are in the Appendix
- The TDA will be in place from 22nd October 2023 to 4th January 2023 (notification will be given if this changes in the final submission) and will be cancelled before this date if all operations are completed.
- Flylogix is in discussion with Anglia Radar (NATS) to provide a Danger Area Crossing Service during the periods the TDA is active. The frequency for the service will be published on the NOTAM and in the AIC – along with Flylogix contact details.
- Flylogix will be available for direct contact by telephone before and during operations if additional information is required

### 5.3 TDA Design Rationale

We want to minimise the impact the TDA has on other air users. The following is a summary of the considerations made when designing the proposed TDA and rationale for its features.

#### 5.3.1 Airfield

Hollym was selected due to the following characteristics:

- Situated on the coast, minimising the travel of the UA over land and therefore minimising risk to those on the ground

 

 

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- A private airfield with relatively little traffic

### 5.3.2 Inshore segments

The inshore segments of both TDAs (Segment A) have been designed to

- Not cover the coast to allow other aircraft to coast follow
- Avoid the windfarm off the coast

### 5.3.3 Offshore segments

The consideration for the offshore segments was

- The nominal width of these segments is 4 nautical miles. This has been selected to minimise the volume of the TDA whilst providing a 2-mile-wide corridor for manoeuvring and a mile buffer zone each side
- The shape of these segments avoids all 3rd party offshore structures/assets and their HTZs to minimise impact on helicopter operations in the Southern North Sea
- The sections around the il and gas platforms has been designed to cover only those platforms being inspected.

## 6. PLANNING AND NOTIFICATION

Flights will be between 1.5 hours and 5 hours long. The TDA will be activated 15 minutes before take-off and end up to 4 hours after the last scheduled landing time. This contingency will be determined by weather forecast and by the uncertainty in helicopter flights and other operations at these facilities. If the UA lands before the end of the TDA activation, Flylogix will inform ATC and request of the CAA that the NOTAM is cancelled.

There are ten flights planned and flights will be conducted at weekends and times when there is less oil and gas helicopter traffic. Flylogix may conduct multiple flights in a single day.

To activate the TDA, a NOTAM will be published at least 24 hours in advance of planned flights detailing activations times. If UA activity is cancelled for whatever reason, we will request the NOTAM is cancelled.

If direct notification is required in addition to the NOTAM publication, please make note of this in your feedback.

## 7. YOUR FEEDBACK

The CAA require evidence of engagement with other air users as part of the airspace change request process. We would therefore value your feedback by Friday 12th August so that we can include this in our submission to the CAA. This feedback can be submitted in the following ways:

1. An email to [redacted] detailing any recommended changes to the TDA to improve safety or reduce impact on you – or alternatively notifying that you are happy with the proposal.

 

 

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2. Setting up a call with us to give your feedback. We will take minutes of the call and get your approval of these minutes before submitting them to the CAA. Email [redacted] or call [redacted] to do this.

Where possible, if feedback could be sent before the end of the engagement period this would be greatly appreciated. This affords Flylogix more time to work with you on any recommended changes to the TDA and collate your responses into a summary report for the CAA. Flylogix will send periodic reminders during engagement if no response has been received. If no response is received before the end of the engagement it will be assumed that you had no feedback.

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## APPENDIX 1 TDA COORDINATES

| TDAXXX | |
|---|---|
| **Identification and Lateral Limits** | **Upper Limit/Lower Limit** |
| **TDA XXXA**<br><br>Straight lines joining successively the following points:<br><br>N534630 E0001850<br>N534334 E0002552<br>N534124 E0000510<br>N534442 E0000112<br>N534630 E0001850 | Lower Limit: SFC<br><br>Upper Limit: 1300FT AMSL |
| **TDA XXXB**<br><br>Straight lines joining successively the following points:<br><br>N540412 E0001120<br>N540238 E0001818<br>N534334 E0002552<br>N534630 E0001850<br>N540412 E0001120 | Lower Limit: SFC<br><br>Upper Limit: 1300FT AMSL |
| **TDA XXXC**<br><br>Straight lines joining successively the following points:<br><br>N543322 E0012523<br>N542935 E0012743<br>N540238 E0001818<br>N540412 E0001120<br>N543322 E0012523 | Lower Limit: SFC<br><br>Upper Limit: 1300FT AMSL |
| **TDA XXXD**<br><br>Straight lines joining successively the following points:<br><br>N543947 E0022024<br>N543108 E0022432<br>N542935 E0012743<br>N543322 E0012523<br>N543947 E0022024 | Lower Limit: SFC<br><br>Upper Limit: 1300FT AMSL |

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| TDAYYY | |
|---|---|
| Identification and Lateral Limits | Upper Limit/Lower Limit |
| **TDA YYYA**<br><br>Straight lines joining successively the following points:<br><br>N534749 E0003256<br>N534428 E0003719<br>N534124 E0000510<br>N534442 E0000112<br>N534749 E0003256 | Lower Limit: SFC<br><br>Upper Limit: 1300FT AMSL |
| **TDA YYYB**<br><br>Straight lines joining successively the following points:<br><br>N535422 E0004641<br>N535422 E0005830<br>N534428 E0003719<br>N534749 E0003256<br>N535422 E0004641 | Lower Limit: SFC<br><br>Upper Limit: 1300FT AMSL |
| **TDA YYYC**<br><br>Straight lines joining successively the following points:<br><br>N540646 E0003108<br>N540820 E0011026<br>N535422 E0011026<br>N535422 E0003108<br>N540646 E0003108 | Lower Limit: SFC<br><br>Upper Limit: 1300FT AMSL |

# APPENDIX 3 REPLIES FROM STAKEHOLDERS

## Appendix 3.1 Replies from those with feedback or objections

**NHV**

TDA SNS

CJ [redacted]

05/07/2022

@ Focussed work

This message was sent with High importance.

Good morning Ed,

In response to ACP-2022-011, we fly to the York from Norwich on contract throughout the period notified. We tend to man up the platform at around 9am and de-man it around 4pm most days on a preplanned schedule. Clearly the A and B segments of the TDA for Ravensburgh field inspections could cause us issues with manning this platform, so I ask that you consider any inspections to center in the middle of the day to avoid preventing us from transit to the York.

Kind regards

[redacted]

Re: TDA SNS

EC [redacted]

Reply Reply All Forward

Tue 05/07/2022 09:42

@ Focussed work

If there are problems with how this message is displayed, click here to view it in a web browser.
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Good morning Justin

Thanks for your time on the phone. To quickly summarise what we spoke about so we can include it in the engagement material.

Discussion was

- NHV are flying to York on weekend as well as weekdays
- You get a schedule about a month in advance and would be happy to share this
- York is outside the TDA but the TDA may restrict approach in some conditions
- Icing conditions would be a particular problem as you need to fly lower - but Flylogix require permission from ATC to fly on the day and this is unlikely to be given if there are icing conditions and helicopters are operating at ~1,300ft or below

We agreed

- Flylogix will contact NHV in the month before the TDA is activated to get a schedule for flights to York
- Flylogix will then schedule our flights so we are not in Segment A and B of the TDAs when you are transiting to York
- The Danger Area Crossing Service from Anglia Radar will allow you to enter the TDA if we are not in the immediate area
- We will notify you by email of our flight times and give you contact details of the flight crew so that we can manage things tactically if and when plans change at short notice

Have a good flight

[redacted]

On Tue, 5 Jul 2022 at 09:04, [redacted]

**2Excel**

RE: Engagement for ACP-2022-011

PF [redacted]

Wed 10/08

You replied to this message on 10/08/2022 16:58.
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Hi

Our only feedback is that the vicinity of TENDO is used by 2Excel for Oil Dispersant Delivery spray training under NOTAM. This involves our 727 and Navajo aircraft down to surface level. We are unlikely to be training on weekends though.

[redacted]

RE: Engagement for ACP-2022-011

EC [redacted]

Wed 10/08

Thanks Paul.

We will be looking at NOTAMs before activating the TDA and will get in contact if we see operations in TENDO.

[redacted]

**From:** [redacted]
**Sent:** 10 August 2022 16:53

**Norwich airport**

RE: Engagement for ACP-2022-011

AC [redacted]

Fri 12/08

You replied to this message on 12/08/2022 15:34.
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Afternoon Ed,

Norwich Airport are content with the proposal, the TDA provides suitable protection to the transponder equipped BVLOS UAS, the proposed AOO is far enough away from our main operational areas to have minimal impact on Norwich Ops. I would expect to see SSR Code assigned to the UAS as part of the notification of the TDA.

Regards

[redacted]

RE: Engagement for ACP-2022-011

EC [redacted]

Fri 12/08

Thanks Andy. Well received.

For operations in the Central North Sea and from Shetland we have been using 7000 as the SSR code. I will ask Anglia Radar about assigning a dedicated code.

Regards

[redacted]

**Subject:** RE: Engagement for ACP-2022-011

**British Helicopter Association**

Re: Engagement for ACP-2022-011

EC [redacted]

04/07/2022

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Hi [redacted]

Thank you for the information. Uni-Fly have been engaged and we will add Wiking.

Ed

On Mon, 4 Jul 2022 at 12:40 [redacted]

[redacted]

> Uni-fly and Wiking [redacted] are 2 operators who you should also include.
>
> [redacted]

**BMAA**

EC [redacted]

Fri 12/08

**From:** [redacted]
**Sent:**
**To:** Ed
**Cc:** 'R
**Subject:** RE: Engagement for ACP-2022-011

Dear Ed,

The British Microlight Aircraft Association has no objection to this ACP on the basis of the TDA being offshore. However, we would question the need for the TDA to be up to 1500ft AMSL on the coast since our members do often follow coastal routes just offshore to comply with the rules of the air if flying with the coast on their left and at heights between 500ft to 1500ft above ground/AMSL. Can the TDA therefore be reduced in height until a reasonable distance offshore?

Regards
[redacted]

EC [redacted]

Fri 12/08

Dear [redacted]

Thank you very much for the BMAA feedback.

To minimise the impact on coast following aircraft we have designed the TDA so it does not cross the coast (we flying visual line of sight rules around the airfield and then enter the TDA just offshore). I understand that this may still impact aircraft following just offshore so we will investigate reducing the ceiling of the TDA inshore and get back to you.

Regards

[redacted]

[redacted]

RE: Engagement for ACP-2022-011

R [redacted]

Reply | Reply All | Forward

Tue 12/07/2022 10:51

This message was sent with High importance.
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[redacted]

**OBJECTION**

From the ACP portal;-

This ACP has jumped to step 4 without the intermediate steps being undertaken.

There are no submitted documents and the applicant has not complied with CAP1616. It will elicit a complaint to the CAA complaints channel if not corrected.

No safety case has been presented.

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 controlled airspace across a significant portion 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 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.

[redacted]

Reply from Flylogix

Re: Engagement for ACP-2022-011

EC [redacted]

Reply | Reply All | Forward

18/07/2022

If there are problems with how this message is displayed, click here to view it in a web browser.
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Dear [redacted]

Thanks for your feedback. We will consider it when finalising our proposal and will forward it in full to the CAA.

Regards

[redacted]

Additional email from [redacted]

Re: Engagement for ACP-2022-011

R [redacted]

Reply | Reply All | Forward

Tue 19/07/2022 09:57

@ Focussed work

This message was sent with High importance.
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There has been no consultation in accordance with Alembic C of CAP1616 and my point of safety has not been discussed.

In making the following point I use the world of IFR flying as a broad parallel to BVLOS.

My conventional world classifies aircraft as either.

1. Those types that will never be suitable for flight in IFR. (The 'flying flea' is an example)

2. Those types which can be flown IFR but are not suitably equipped.

3. Those types which can be flown IFR and are suitably equipped.

The pilot must be suitably rated.

If I as a qualified IFR pilot was to approach the CAA and ask to fly a type 1 aircraft IFR, I would , quite rightly be given short shrift and told to go away.

If I as a qualified IFR pilot was to approach the CAA and ask to fly a type 2 aircraft IFR, I'd be told to go away and equip it and come back when it's certified.

I don't need to ask anyone whether I can jump in a type 3 aircraft and blat off into wild blue yonder in IMC.

There would be not a cats chance in hades of getting a TDA to fly a type 1 or type 2 aircraft IFR.

Perhaps you can see why its so difficult for conventional aircraft operators to watch the UAV World go about its business.

On what basis does this application proceed.

## Appendix 3.2 Replies from those who had no objection or feeback

**NATS**

RE: [EXTERNAL] Engagement for ACP-2022-011

PC [redacted]

Reply | Reply All | Forward

05/08/2022

Click here to download pictures. To help protect your privacy, Outlook prevented automatic download of some pictures in this message.

Hi Ed,

Thank you providing NATS the opportunity to review and comment on Stage 3 of your ACP.

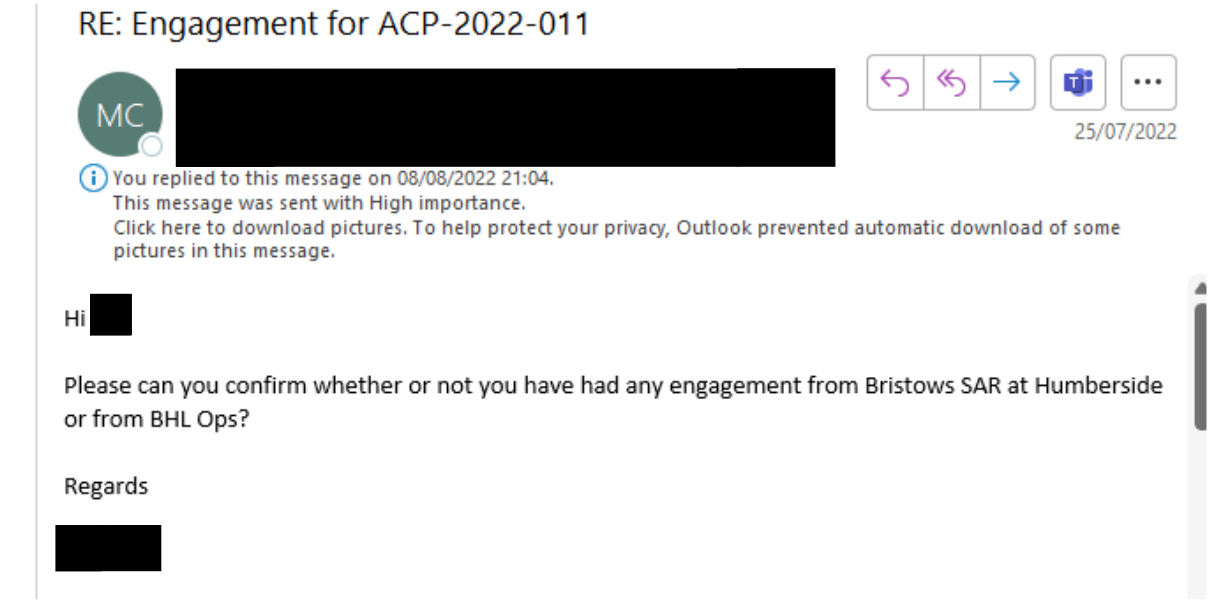
I can confirm that NATS are happy to support this ACP. I understand that NATS Aberdeen has been working closely with Fly Logix, and that Anglia Radar will be providing a DACS as per previous agreements, which is subject to the usual regulatory and internal compliance.

Rgds

[redacted]

[redacted]

**JRCC**



RE: Engagement for ACP-2022-011

MC [redacted]

25/07/2022

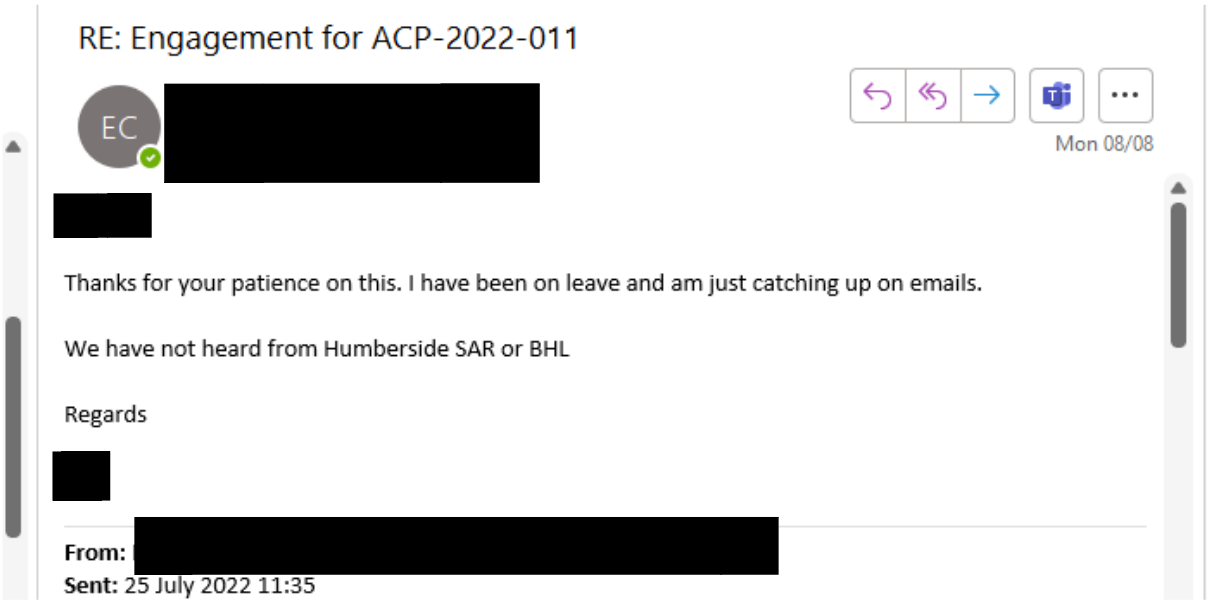
You replied to this message on 08/08/2022 21:04.
This message was sent with High importance.
Click here to download pictures. To help protect your privacy, Outlook prevented automatic download of some pictures in this message.

Hi [redacted]

Please can you confirm whether or not you have had any engagement from Bristows SAR at Humberside or from BHL Ops?

Regards

[redacted]



RE: Engagement for ACP-2022-011

EC [redacted]

Mon 08/08

[redacted]

Thanks for your patience on this. I have been on leave and am just catching up on emails.

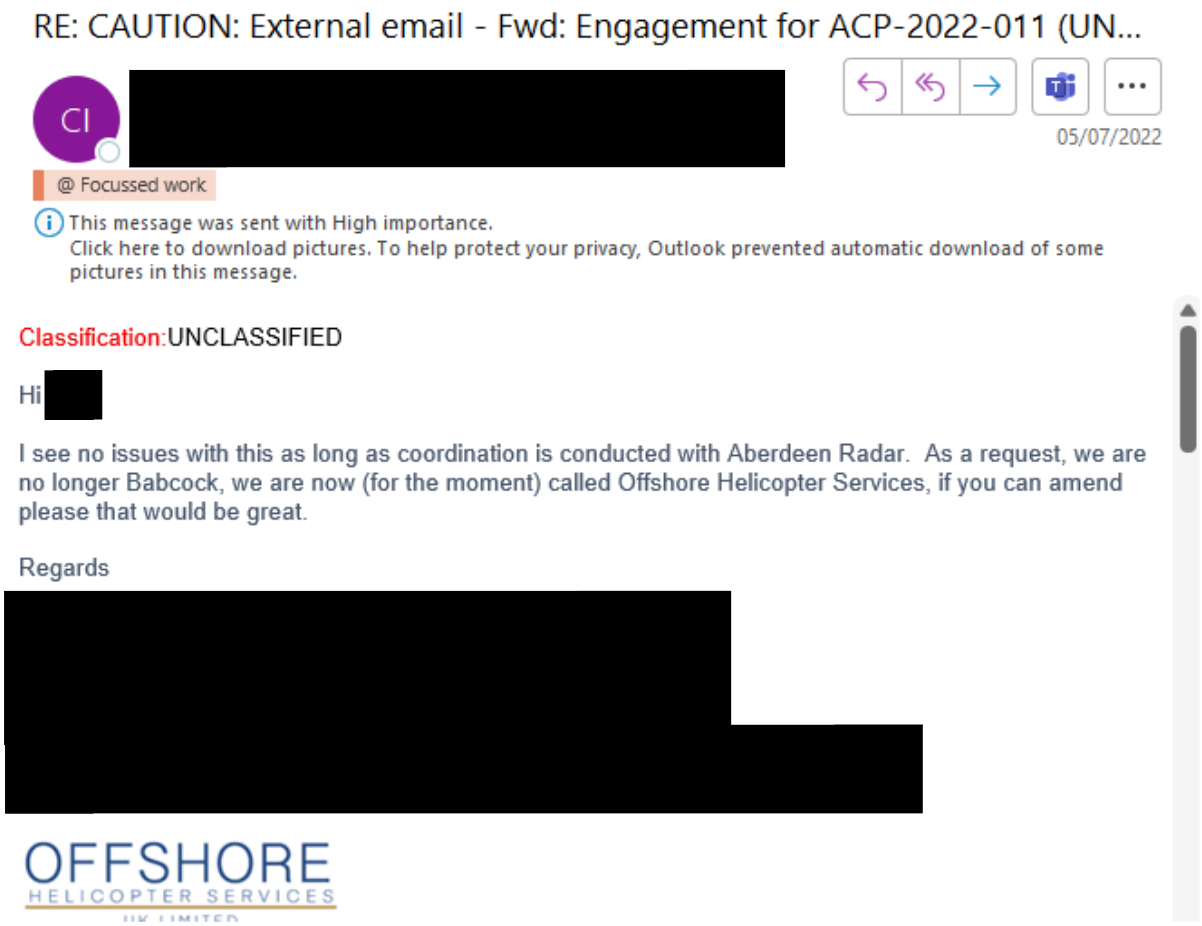
We have not heard from Humberside SAR or BHL

Regards

[redacted]

**From:** [redacted]
**Sent:** 25 July 2022 11:35

**Offshore Helicopter service**


RE: CAUTION: External email - Fwd: Engagement for ACP-2022-011 (UN...

CI [redacted]

05/07/2022

@ Focussed work

This message was sent with High importance.
Click here to download pictures. To help protect your privacy, Outlook prevented automatic download of some pictures in this message.

Classification:UNCLASSIFIED

Hi [redacted]

I see no issues with this as long as coordination is conducted with Aberdeen Radar. As a request, we are no longer Babcock, we are now (for the moment) called Offshore Helicopter Services, if you can amend please that would be great.

Regards

[redacted]

OFFSHORE
HELICOPTER SERVICES

**DAATM**

RE: Engagement for ACP-2022-011

WP [redacted]

28/07/2022

This message was sent with High importance.

Good Morning [redacted]

Please take below as the MOD feedback for this ACP.

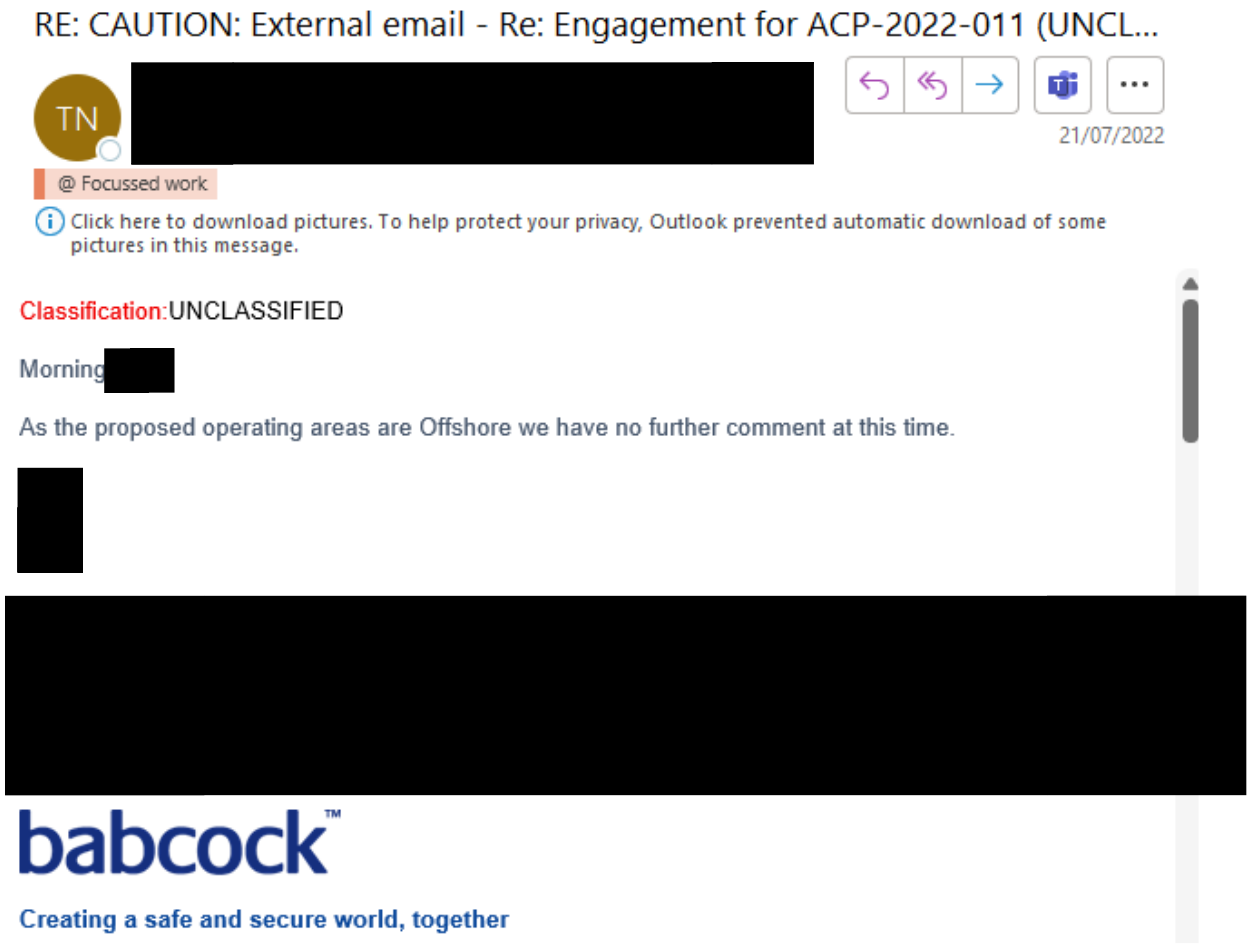
There is negligible impact on MOD operations due to the temporary nature of the airspace, the fact it is subject to NOTAM and DACS may be available.

Please do not hesitate to contact me if you have any further questions.

Regards

[redacted]

**Babcock Mission Critical Onshore**


RE: CAUTION: External email - Re: Engagement for ACP-2022-011 (UNCL...
TN
[redacted]
21/07/2022
@ Focussed work
Click here to download pictures. To help protect your privacy, Outlook prevented automatic download of some pictures in this message.
Classification:UNCLASSIFIED
Morning [redacted]
As the proposed operating areas are Offshore we have no further comment at this time.
[redacted]
[redacted]
babcock™
Creating a safe and secure world, together

**Unifly**

RE: Engagement for ACP-2022-011

LN [redacted]

21/07/2022

This message was sent with High importance.
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Dear [redacted]

Thank you for the proposal which I have reviewed and have no objections to. Best of luck with your campaign.

Med venlig hilsen / Best Regards,

[redacted]

UNI-FLY

[redacted]

**Hollym Airfield**

[redacted] Flylogix Operational Lead, visited Hollym Airfield and had a discussion with [redacted] on how operations would be conducted. [redacted] gave permission for operations conducted from Hollym and had no feedback on the TDA.

**Airfield Operators Group (AOG)**

Re: Engagement for ACP-2022-011

EC [redacted]

04/07/2022

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Good afternoon [redacted]

Yes that is correct. We will be operating from a small private field by the coast and then will be offshore so not impacting airfields

[redacted]

On Sat, 2 Jul 2022 at 14:04, [redacted]

> Good afternoon,
> Thanks for your email.
> I sit on NATMAC as a representative of the Airfield Operators Group, so my primary concern is any measure that might impact member airfield's operations.
> Can I assume that your activities are sufficiently offshore that they would be unlikely to impact the operations of even a coastal airfield?
> Thanks and regards,
> [redacted]
>
> Sent from my iPhone

**ARPAS**

ACP 2022 011

RD [redacted]

03/07/2022

@ Focussed work

This message was sent with High importance.

Dear [redacted]

Thank you for sending us your stakeholder consultation paper for a TDA over the Southern North Sea with the reference ACP- 2022- 011 and dated July 2022.

ARPAS UK fully supports and endorses Flylogix's ACP application. We believe that the objectives of the application are wholly relevant to today's environmental priorities, use a technology that helps reduce emissions from the aviation sector and longer term will help continue research and development of a viable BVLOS activity for Remotely Piloted Aircraft Systems.

Please do let us know if we can do anything to help with the progress of your ACP.

kind regards

[redacted]

**British Gliding**

Re: Engagement for ACP-2022-011

EC [redacted]

20/07/2022

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Click here to download pictures. To help protect your privacy, Outlook prevented automatic download of some pictures in this message.

Many thanks [redacted]

On Wed, 20 Jul 2022 at 11:04, [redacted]

[redacted]

> This proposal does not impact on gliding operations.
>
> Kind regards
>
> [redacted]
>
> British Gliding Association