



Morecambe Bay TDA – ACP-2021-022

Dear Stakeholder,

28/09/22

We have raised a formal complaint with the CAA with regards the time taken by the Airspace Regulation team to respond to our submission of our Airspace Change Proposal for the Morecambe Bay Medical Shuttle Temporary Danger Area. This has now concluded both stages of the CAA complaint process and despite the application now in its 523rd day, the CAA did not uphold our complaint and as such it has been referred to the Parliamentary and Health Service Ombudsman, who will no doubt pass it to DfT.

You may recall that at the end of the first stakeholder engagement process we submitted our proposal and were sent back out for another round of stakeholder engagement as we had submitted our TDA dimensions in AGL and not AMSL. CAP1616 (Airspace Change) does not mention this requirement. Furthermore CAP722 (Unmanned Aircraft Systems Operations in UK Airspace) refers to drones only in terms of height (AGL) as they do not operate altimeters, nor have pressure settings, nor should they be operated above the transition level. So being sent back out to stakeholder engagement seemed rather strange, but we accepted it with good grace and undertook the process. The decision date for the TDA came and went and then we heard that as we had not submitted a Safety Assessment through our drone operator to the UAS department they could not approve the TDA. When we asked where it mentioned this Safety Assessment in CAP1616, we got no reply.

Whilst we worked to generate the Safety Assessment we asked for feedback on the second stakeholder engagement and were even more surprised when we were now informed that we would now have to undertake both noise analysis of the drones operation and provide a summary of the main themes and issues raised during the initial engagement as “there is no way of understanding the issues raised during the engagement without going through all the evidence.”

Furthermore as the proposed dates for the operations of the single drone at 250’ (AGL) predominantly over water, with a DACS service available, have changed, they have demanded we undertake a third period of Stakeholder Engagement to check to see if there are any issues with the new dates (April-June ’23).

Remembering that quantum mechanics aside “Insanity is doing the same thing over and over and expecting different results.” And having been twice through the Stakeholder Engagement process with airspace at each time asking for ever more undertakings, I wrote to [REDACTED] and asked him if he thought I should carry on as I was close to losing the will to live (regarding ACP-2021-022). His office negated the requirement for the noise analysis, which is nice, and we have through the formal complaint process agreed to have a meeting between ourselves, airspace and UAS teams to try and move this forward but they are going to insist on this third period of stakeholder engagement to check that the change of date is okay with all stakeholders.

We have asked you about operating the drone December through February (Initial Stakeholder Engagement) and we have asked you about operating the drone between June and August (Second Stakeholder Engagement), but we now need to ask you your views on us operating the drone between April and June, next year, 2023.

Nothing has changed route wise, nor airspace dimensions, only the seasons change and my levels of enthusiasm. Once again, we have opted to use the www.morecambebaydrones.com website from which all information about our proposed activities can be found. If you wish to provide any relevant feedback for the same drone operating at the same height, between April and June 2023, please send it through the website portal.

Many Thanks,

[REDACTED]
ELECTRIC AVIATION LTD.