

Stakeholder Engagement Feedback Summary ACP-2022-031

1. Introduction

This document forms part of the Airspace Change Process (ACP) as defined in the Civil Aviation Publication (CAP) 1616. Apian, the change sponsor, is seeking to establish a Temporary Danger Area (TDA) complex during notified periods to enable the safe beyond visual line of sight (BVLOS) uncrewed aircraft systems (UAS) operations in Northumbria in partnership with the Northumbria Healthcare NHS Foundation Trust.

Apian is a medical logistics company, focused on the use of UAS to deliver faster, smarter and greener healthcare. Founded by a team of NHS doctors and ex-Googlers, Apian is building products and platforms that connect the healthcare industry with the UAS industry to improve patients' health outcomes and staff well-being.

For this project, Apian, in conjunction with the Northumbria Healthcare NHS Foundation Trust is looking to conduct feasibility flights using UAS between specific hospitals in Northumbria for the distribution of medical payloads such as chemotherapy drugs, urgent medical supplies and patient samples. Provisional dates for the feasibility flights are from 13th Feb 2023 and end on the 12th May 2023.

The CAA Policy for the Establishment of Permanent and Temporary Danger Areas – 20200721 (a scaled down version of CAP1616) includes a statutory obligation to engage aviation stakeholders and other relevant stakeholders and give due consideration to the potential positive and negative impacts of the change on the airspace users.

Following an Assessment Meeting with CAA Airspace Regulation on 16 August 2022 to discuss Apian's Statement of Need, it was agreed that to facilitate its operations a TDA would be required, the proposals for which would be subject to an aviation stakeholder engagement exercise in accordance with the CAA Policy for the Establishment of Permanent and Temporary Danger Areas.

This document provides a summary of Apian's aviation stakeholder engagement exercise that Apian completed between 9 September 2022 and 4 November 2022 to allow aviation stakeholders to comment on Apian's TDA design and operational proposals. Additional engagement with some stakeholders continued beyond the deadline for the development of a Temporary Operating Instruction (TOI), evidence from which has been captured in a separate summary document.

2. Methodology

a. Stakeholder identification

Apian engaged aviation stakeholders considered to be directly affected and potentially impacted as well as those that would likely have an interest in the ACP. A full description of the stakeholders identified can be found on the Airspace Change Portal Stakeholder Engagement Plan. The Stakeholder Engagement Plan was reviewed by the CAA Airspace Regulator - Consultation and Engagement team.



Informal stakeholder engagement was conducted with stakeholders identified early on in the project in advance of the ACP submission. These are referenced in the Stakeholder Engagement plan, but will not referenced in this stakeholder feedback.

b. Engagement material

Apian shared the stakeholder engagement material containing details and a map of the proposed TDA, as well as details of the operation of that TDA.

Technical information on the UAS was presented to the stakeholders. Apian has offered meetings to stakeholders if they wished to discuss the details.

All material distributed to stakeholders is available on the CAA Airspace Change Portal (ACP-2022-031)

c. Communications

Apian shared engagement material with stakeholders via email, which was completed on the 9th September 2022, consistent with the timelines agreed with the CAA. Apian wished to encourage a good level of engagement with the process from stakeholders, and reminder communications were provided by email to those that had not responded by these dates on 13 October 2022 and 1 November 2022. A final reminder email was sent to those stakeholders that had not provided a response on 4 November 2022, the same day as the closing date for feedback.

d. Feedback

Feedback from stakeholders received by Apian has been shared in full with the CAA in this document as well as any responses from Apian.

Where stakeholders requested that Apian keeps them up-to-date with progress of the airspace change and the final designs agreed with the CAA, Apian will do this at the soonest opportunity within the airspace change process.

3. Original change proposal

a. TDA overview

There are 3 hospitals that will be involved in the flight trial. These are:

- i. Wansbeck General Hospital, Woodhorn Lane, Ashington, NE63 9JJ
- ii. Alnwick Infirmary, Infirmary Drive, Alnwick, NE66 2NS
- iii. Berwick Infirmary, Infirmary Square, Berwick-upon-Tweed, TD15 1LT



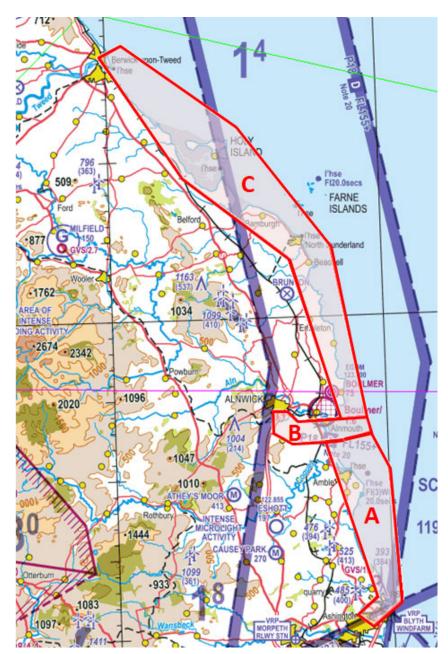


Figure 1: Proposed Temporary Danger Area Structure. (NOT TO BE USED FOR NAVIGATION)

The proposed TDA structure which will provide segregated airspace between the three hospitals as illustrated above, within the area bounded in red, and is described in more detail below.

Table 2 – Route specification and nominated TDA segment				
Route Distance Altitude TDAs Required				
Wansbeck to Alnwick (and reverse)	18.4 nm	<400ft AGL	Areas A & B	
Alnwick to Berwick	erwick 35.6 nm <400ft AGL Area B & C			



(and reverse)			
Wansbeck to Berwick (and reverse)	43.7 nm	<400ft AGL	Areas A, B & C

b. TDA Complex

Apian requires the use of segregated airspace within which to safely conduct the proposed BVLOS UAS operations. The proposed TDA complex has been designed in segments to allow activation of specific areas for individual flights as appropriate. These segments have been attributed an Area identifier and are as follows;

- i. Wansbeck segment (Area A)
- ii. Alnwick segment (Area B)
- iii. Berwick segment (Area C)

Proposed TDA complex

TDA Area A

Lateral Limits	Vertical Limits
Area bounded by straight lines joining:	Upper limit: 600FT ALT
55°10'22.00''N 001°32'15.00''W	Lower limit: SFC
55°12'02.00''N 001°28'52.00''W	
55°20'29.00''N 001°29'55.00''W	
55°22'37.00''N 001°31'45.00''W	
55°22'13.00''N 001°34'05.00''W	
55°22'07.00"N 001°36'49.00"W	
55°12'19.00''N 001°31'32.00''W	
55°11'10.00''N 001°33'45.00''W	
55°10'22.00''N 001°32'15.00''W	



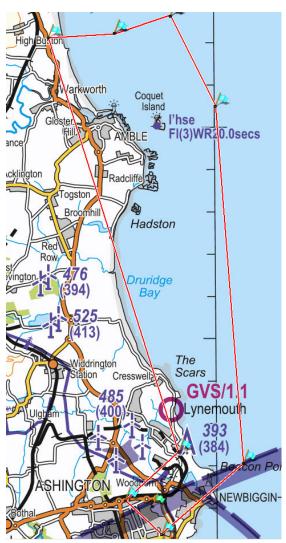


Figure 2: Proposed Temporary Danger Area Segment A. (NOT TO BE USED FOR NAVIGATION)

TDA Area B

Lateral Limits	Vertical Limits
Area bounded by straight lines joining:	Upper limit: 850FT ALT Lower limit: SFC
55°24'06.00''N 001°42'17.00''W	Lower IIIIII. SPC
55°24'06.00''N 001°41'09.00''W	
55°23'22.00''N 001°39'46.60"W	
55°23'37.00''N 001°32'02.00''W	
55°22'37.00''N 001°31'45.00''W	
55°22'13.00''N 001°34'05.00''W	



55°22'01.00"N 001°40'25.00"W 55°22'40.00"N 001°42'28.00"W 55°24'06.00"N 001°42'17.00"W

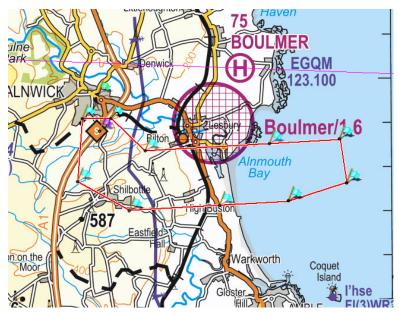


Figure 3: Proposed Temporary Danger Area Segment B (NOT TO BE USED FOR NAVIGATION)

TDA Area C

Lateral Limits	Vertical Limits
Area bounded by straight lines joining:	Upper limit: 600FT ALT Lower limit: SFC
55°46'38.00''N 002°00'29.00''W	Lower limit. SFC
55°47'20.00''N 001°58'00.00''W	
55°41'55.00''N 001°45'17.00''W	
55°34'32.00''N 001°35'35.00''W	
55°23'37.00''N 001°32'02.00''W	
55°23'31.00''N 001°34'50.00''W	
55°33'46.00''N 001°40'14.00''W	
55°38'49.00''N 001°51'29.00''W	
55°46'38.00''N 002°00'29.00''W	



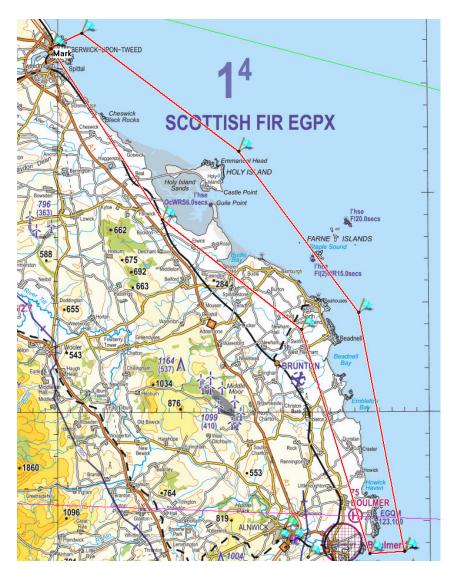


Figure 4: Proposed Temporary Danger Area Segment C. (NOT TO BE USED FOR NAVIGATION)

Note: All images are Credit of CAA and NATS. Ordnance Survey Mapping is reproduced subject to © Crown copyright 2022 OS 100065754. Any map or chart images are "Not for Navigational Use".

c. Notification

Apian, as ACP sponsor, will be responsible for submitting the NOTAM on the days the TDA is planned to be in use.

d. TDA activation

Table 3 shows the likely activation periods for the TDA complex and the predicted frequency of flights. The figures have been calculated using the NHS requirements for the distribution of medical payloads such as chemotherapy drugs, patient samples and urgent medical supplies.



Table 3 – Likely TDA activation periods and predicted frequency of flights					
Sites	Day	Time (Local)	Total number of flights* per day		
Wansbeck, Alnwick,	Monday/Tuesday	09:45-14:15 16:00-18:15	8 flights		
Berwick.	Wednesday	08:45-14:45 16:00-18:15	10 flights		
	Thursday	08:45-14:30 16:00-18:15	8 flights		
	Friday	08:45-14:30 16:00-18:15	11 flights		
	Saturday/Sunday	N/A	N/A		

^{*}A flight is one flight between two hospital sites, e.g. Wansbeck to Alnwick, flight scheduled subject to change

4. Summary of feedback

Apian received email feedback from 16 stakeholders. Stakeholders were broadly supportive, raised no issues and/or willing to work with Apian to find a workable solution that enables safe operations.

Apian provides the following summary of responses from aviation stakeholders on the TDA complex proposals. Full, unredacted versions of the written responses to the aviation stakeholders engagement exercise can be viewed in the Appendices.

Emergency service operators were contacted in advance of the formal stakeholder engagement period to discuss the necessary mitigations to ensure safe deconfliction with their operations. Apian has been working with these emergency service operators to develop a Temporary Operating Instruction (TOI) and which is mutually agreeable to all parties.

Apian has included email confirmations of agreement/acceptance in a separate Stakeholder Summary Report – Targeted Aviation Stakeholder Engagement – Temporary Operating Instruction.

a. Emergency service operations

- Clearance into the TDA must be available to emergency service aircraft within short notice, including when emergency service aircraft are already airborne.
- Emergency service aircraft are authorised to conduct flight operations at 300ft AGL in poor weather and with low visibility, the pilot decides on the safest route, access to the TDA in these conditions may be required.
- One stakeholder stated that their emergency service aircraft was not ADS-B equipped. Although the engagement with Apian through this process, has positively encouraged them to expedite the update to their aircraft.



• Emergency service aircraft are often required to land on sites and therefore reducing the land footprint of the TDA would limit the TDA access requests.

b. Military operations

- The military could potentially require short-notice, unplanned entry into/through the TDA in the interests of National Security, Standing Home Commitments or for other operational tasks.
- The military have an exercise planned to operate between 6 Mar 24 Mar 2023 in TDA EG D597. Whilst the TDA itself has a lower limit of FL85 and therefore naturally deconflicts with your TDA, there may be a greater than usual number of military air systems including helicopters that will be operating in the vicinity of the proposed TDAs at low level.
- As part of the exercise mentioned above there may be deployed emitters which are
 utilised in support of these exercises, with the resulting HIRTAs potentially forming a
 hazard to the RPAS that you will be operating within the TDA.
- Outside the points above, overall impact on operations would be minimal due to routes being planned around NOTAM, should the airspace not be required for operations, the request is the TDA is deactivated

c. Scheduled services and General Aviation

- The ACP would not impact NATS operations
- The ACP would not impact the gliding community
- VFR pipeline inspections are conducted in the Northumbria area at 500 AGL. Specific areas that these are conducted in relation to the TDA are;
 - Ashington within the south tip of Area A.
 - West of Shilbottle just outside Area B
 - South of Berwick Upon Tweed just outside area C
- Hang gliders and paraguilders routinely fly from surface to cloud base
- A flying school and club operate out of Athey's moor. The flying school can
 occasionally fly below 500ft AGL when they do certain procedures as part of pilot
 training. These are often completed along the coast where the ground is level and
 fields are suitable. Club members regularly fly along the coast line and can fly below
 500ft AGL just offshore, complying with the 500ft rule.
- GA flights can often take place along the coast line using the coast line as a reference point for transit flights.
- Newcastle International Airport expected to see safety mitigations and procedures to support the proximity of operations adjacent to their Control Zone.
- Newcastle International Airport saw no significant impact on their operations from the ACP.

d. Other

 Northumbria County Council, Northumberland Estates and Northumbria Healthcare NHS Foundation Trust have verbally supported the proposal, with all three assisting us in securing landing sites within the area.

e. Deconfliction

 Emergency services and military operations expected to see a deconfliction process addressed in a mutually agreed TOI



- Some stakeholders stated that a weekly flying programme for our activity would be beneficial alongside the NOTAM
- Two stakeholders stated that it was manageable to adjust their operations to accommodate for the period.

5. Apian response

Apian appreciates the feedback that aviation stakeholders took the time to provide and looks forward to working with them (and the CAA) to agree an airspace design and robust deconfliction process that satisfies everyone where reasonably practicable. Having reviewed this valued feedback, Apian considers and/or proposes the following:

a. Airspace change

- The proposed TDA complex will not be permanently active. Proven procedures will be adopted to ensure that the airspace is activated and notified as and when required. Apian will promulgate all TDA activation times and contact details of the Flight Operations Team by NOTAM at least 24 hours before planned use
- Operations will only be conducted in Visual Met Condition for aircraft operating in Class G, below 3000ft and <140kts (flight visibility at least 1500m, remaining clear of cloud) The could base must also be above 1500ft. Meteorological data from the following resources will be utilised: Airport TAFs & METARs, Windy Route planner and deployed 4G enabled weather stations to get accurate readings on-route
- Following feedback from the aviation stakeholders we have reduced the dimensions
 of the TDA (see 6). Ensuring operations are, wherever possible, off the coast line to
 not impact those using the coastline as a geographic reference point, or conducting
 flight training.
- The UAS to be operated during the proposed period of operations is fitted with ADS-B IN and OUT, which can process uncertified ADS-B signals (SIL/SID=0) and will be visible to others with ADS-B in. The UAS operations team (Skyports) will be able to track aircraft that are broadcasting. Further, the UAS is fitted with an automatic collision avoidance system. In the event that a TDA boundary is breached accidentally or in an emergency by an aircraft carrying ADS-B and broadcasting out, the UAS will automatically respond sufficiently early to avoid that other aircraft, based on the assumption that the other aircraft maintains their speed and heading.
- The UAS will be geofenced to maintain within the TDA.

b. Deconfliction process

- Scottish Information (NATS) will provide a Danger Area Activity Information Service (DAAIS).
- Apian, in partnership with Skyports (UAS operators) has produced a TOI that has secured the approval of relevant emergency service aircraft and military stakeholders.
- Apian is willing to produce a weekly flying programme of our planned activity in advance (alongside the NOTAM to be issued 24hrs ahead of the start of operations); however, it is important to be aware that our operations schedules may change up until the flight time due to the changeable nature of the weather.
- Apian will work with the Military to create a deconfliction plan regarding the exercise planned between 6 Mar - 24 Mar 2023 in TDA EG D597. Initial discussions have taken place and can be seen in Appendices h.



6. Final change proposals

Apian requires volumes of segregated airspace within which to safely execute its operations and present an updated TDA complex following the feedback from aviation stakeholders.

A TDA complex of three adjacent TDAs are required to facilitate our operations, the design of which has been chosen to minimise the impact on other aviation stakeholders that operate in the area.

a. TDA complex



Figure 5: Requested Temporary Danger Area Structure (NOT TO BE USED FOR NAVIGATION)

Identification and Name Lateral Limits	Vertical Limits
CAA to insert identification	Upper Limit:
Northumbria TDA Area A	600FT ALT
An area bounded by:	Lower Limit: SFC



551109N 0013239W - 551157N 0012933W - 552030N 0013009W - 552237N 0013146W - 552213N 0013405W - 552010N 0013212W - 551244N 0013134W - 551143N 0013340W - 551109N 0013239W -	
CAA to insert identification Northumbria TDA Area B An area bounded by: 552407N 0014217W - 552406N 0014109W - 552321N 0013946W - 552336N 0013201W - 552237N 0013145W - 552212N 0013405W - 552201N 0014025W - 552240N 0014228W - 5522407N 0014217W -	Upper Limit: 850FT ALT Lower Limit: SFC
CAA to insert identification Northumbria TDA Area C An area bounded by: 553407N 0013810W - 552331N 0013438W - 552336N 0013202W - 553432N 0013534W - 554149N 0014532W - 554643N 0015711W - 554605N 0020415W - 554403N 0020232W - 554458 N 0015610W - 553407 N 0013810W -	Upper Limit: 600FT ALT Lower Limit: SFC





Figure 6: Requested Temporary Danger Area Structure A (NOT TO BE USED FOR NAVIGATION)

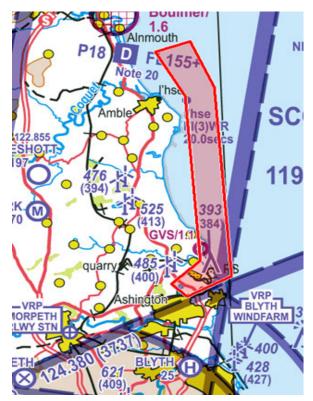


Figure 7: Requested Temporary Danger Area Structure B (NOT TO BE USED FOR NAVIGATION)





Figure 8: Requested Temporary Danger Area Structure C (NOT TO BE USED FOR NAVIGATION)

7. Stakeholders

a. CAA

The CAA is being engaged at every stage of the ACP

b. Aviation stakeholders

		First			
		reminder			
	Initial	distributio	Second	final	
	distributio	n	reminder	reminder	
	n	(13/Oct/22	distributed	distributed	
Stakeholder	(9/9/2022)	(1/11/22)	(4/11/22)	Response
2Excel (Pollution Patrol)	Yes	Yes	Yes	Yes	No
Aircraft Owners and Pilots Association (AOPA)	Yes	Yes	Yes	Yes	No
Airspace4All	Yes	Yes	Yes	Yes	No
Association of Remotely Piloted Aircraft Systems					
UK (ARPAS-UK)	Yes	Yes	Yes	Yes	Yes
Atheys Moor flying school	Yes	Yes	N/A	N/A	Yes
BAe Systems	Yes	Yes	Yes	Yes	No
Borders (Milfield) Gliding Club	Yes	Yes	Yes	N/A	Yes



Bristow (SAR)	Yes	Yes	Yes	Yes	Yes
British Airline Pilots Association (BALPA)	Yes	Yes	Yes	Yes	No
British Airline Pilots Association (BALPA)	Yes	Yes	Yes	Yes	No
British Balloon and Airship Club	Yes	Yes	Yes	Yes	No
British Business and General Aviation Association					
(BBGA)	Yes	Yes	Yes	Yes	No
British Gliding Association (BGA)	Yes	Yes	N/A	N/A	Yes
British Hang Gliding and Paragliding Association					
(BHPA)	Yes	Yes	Yes	Yes	Yes
British Helicopter Association (BHA)	Yes	Yes	Yes	Yes	No
British Microlight Aircraft Association (BMAA)	Yes	Yes	Yes	Yes	No
British Microlight Aircraft Association's (BMAA)					
Airspace Team	Yes	Yes	Yes	Yes	No
British Microlight Aircraft Association's (BMAA)					
Airspace Team	Yes	Yes	Yes	Yes	No
British Model Flying Association (BMFA)	Yes	Yes	Yes	Yes	No
British Skydiving	Yes	Yes	Yes	Yes	No
Drone Major	Yes	Yes	Yes	Yes	No
Eshott airfield	Yes	Yes	Yes	N/A	Yes
Eccles Newton Farm Airstrip	Yes	Yes	Yes	Yes	No
English Herritage	Yes	Yes	Yes	Yes	Yes
Fishburn airfield	Yes	Yes	Yes	Yes	No
General Aviation Alliance (GAA)	Yes	Yes	Yes	Yes	No
Great North Air Ambulance Service (GNAAS)	Yes	Yes	Yes	Yes	Yes
Heliair (Pipeline)	Yes	Yes	Yes	Yes	No
Helicentre (Pipeline)	Yes	Yes	N/A	N/A	Yes
Helicopter Club of Great Britain (HCGB)	Yes	Yes	Yes	Yes	No
HM Coastguard and search and rescue offices	Yes	Yes	N/A	N/A	yes
HMP Northumberland	Yes	Yes	Yes	Yes	No
Iprosurv	Yes	Yes	Yes	Yes	No
Light Aircraft Association (LAA)	Yes	Yes	Yes	Yes	No
Ministry of Defence - Defence Airspace and Air					
Traffic Management (MoD DAATM)	Yes	Yes	N/A	N/A	Yes
National Grid (Powerline)	Yes	Yes	Yes	Yes	No
National Police Air Service	Yes	Yes	N/A	N/A	Yes
National Trust	Yes	Yes	Yes	Yes	No
NATS (Enroute)	Yes	Yes	N/A	N/A	Yes
NATS (NSL - Airports)	Yes	Yes	N/A	N/A	Yes
Newcastle Airport	Yes	Yes	Yes	N/A	Yes
North sunderland harbour	Yes	Yes	Yes	Yes	No
Northumberland County Council (Berwick)	Yes	Yes	Yes	N/A	Yes (verbal)
Northumberland Estates (Alnwick)	Yes	Yes	Yes	N/A	Yes (verbal)
Northumbria gliding club	Yes	Yes	Yes	Yes	No



	(additional				
	contact				
	details -				
Northumbria Hang Gliding and Paragliding Club	sent 15/09)	Yes	Yes	Yes	No
Northumbria Healthcare NHS Foundation Trust					
(Wansbeck)	Yes	Yes	Yes	N/A	Yes (verbal)
PDG Helicopters (Network Rail)	Yes	Yes	Yes	Yes	No
Region Airspace Users Working Group					
(north-west)	Yes	Yes	Yes	Yes	No
RSPB	Yes	Yes	Yes	Yes	No
UK Airprox Board	Yes	Yes	Yes	Yes	No



- 8. Appendices
- a. Athey's Moor

Stakeholder Engagement ACP-2022-031

21 September 2022 at 11:45



Please find our comments below.

As is currently stands the proposal will significantly impact:

- 1. Our Flying school business
- 2. Flying Club membership
- 3. Other GA pilots
- 4. Possibly bird sanctuaries
- 1. We do not often fly below 500ft AGL but when we do it is vital for pilot training

A. Practice forced landing training, where, if it is legal we will fly almost down to ground level. The best area to do this is along the coast where ground level is low and fields are suitable. Further West, the terrain and quality of the fields is less suitable for this exercise. The quality of the training we can offer will be degraded.

Notification by NOTAM will enable us to avoid collision but will not help our business since lessons are booked days or weeks in advance.

Area A will have most impact on flight training.

- B) A specific part of the training syllabus is to train the student to operate safely at low level generally taken to be less than 500ft AGL. The area available to us will be curtailed but manageable.
- C) The weather conditions along the coast are usually most conducive to flight training because the air is usually smoother enabling the student to understand the connection between their manipulation of controls and the aircraft's behaviour. Further inland, turbulence is generally greater and higher ground is associated with poor visibility which is not ideal for training. For most of the training syllabus we can operate above 500ft AGL, so this is manageable but not ideal.
- 2. Club members fly for pleasure and the areas proposed are the most popular because they are beautiful but also because the terrain is relatively benign as in, in the event of a real forced landing there are a good selection of fields to land in. Furthermore it is common practice and a special pleasure to fly low level, below 500ft AMSL, just offshore. Flight below 500ft AMSL but complying with the 500ft rule can be maintained easily.
- 3. Other GA pilots from Eshott and numerous other airfields use this area. This includes aircraft in transit who frequently follow the coastline for easy navigation and because the weather is usually better for flight safety and comfort. Many of these pilots fly at low level for pleasure but sometimes because of weather. (I suspect that not all of these pilots check NOTAMS. They SHOULD but that does not mean they DO, so there is increased risk of collision. The "visual mass" of a small drone will heighten this risk.
- 4. Birds can be frightened by overflying objects. All pilots are taught to respect bird sanctuaries and breeding sites. For example, we would never fly over the Farne islands, which is included in the proposed area. The relevant authorities should be consulted.

Almost all of the negative impacts above could be avoided by moving the TDAs offshore wherever possible. Clearance from the shoreline of as little as 2 miles would dramatically lessen the negative impacts.

If you wish to discuss any of these matters further please let me know

Many thanks





27 September 2022 at 13:17

Dear

Thank you for your feedback, we greatly appreciate your time at reviewing and returning your comments.

I have included some notes below for you, if you have further comments, please let me know.

We do not often fly below 500ft AGL but when we do it is vital for pilot training

- A) Practice forced landing training, where, if it is legal, we will fly almost down to ground level. The best area to do this is along the coast where ground level is low and fields are suitable. Further West, the terrain and quality of the fields is less suitable for this exercise. The quality of the training we can offer will be degraded. Notification by NOTAM will enable us to avoid collision but will not help our business since lessons are booked days or weeks in advance. Area A will have most impact on flight training.
- B) A specific part of the training syllabus is to train the student to operate safely at low level generally taken to be less than 500ft AGL. The area available to us will be curtailed but manageable.
- C) The weather conditions along the coast are usually most conducive to flight training because the air is usually smoother enabling the student to understand the connection between their manipulation of controls and the aircraft's behaviour. Further inland, turbulence is generally greater and higher ground is associated with poor visibility which is not ideal for training. For most of the training syllabus we can operate above 500ft AGL, so this is manageable but not ideal.

Thank you for raising these points, all comments will be shared with the CAA as part of our stakeholder engagement. Our flight height is typically 400ft amsl, with TDA height above to ensure safe separation between the UAS and other airspace users. We believe the heights that we are requesting ensure we limit the airspace that is restricted and deconflicts with GA flights that are likely to take place above 1000ft. We note that Area A is of most concern and will only be activated when the NHS need dictates.

The TDA activation schedule is based on the minimum time required in order to meet the needs of the NHS. Subject to CAA approval, the TDA will be operated on weekdays (not including public holidays) between set times only (listed in table 3 of the stakeholder engagement document), the operation scheduled will be reviewed before activation of the TDA to ensure we utilise the airspace. We will also withdraw our TDA NOTAM if we have activated and are unable to utilise the airspace (i.e for met conditions or technical reasons). Additionally the TDA airspace is planned to be split into blocks to reduce the total amount of airspace which is segregated at any one time.

2. Club members fly for pleasure and the areas proposed are the most popular because they are beautiful but also because the terrain is relatively benign - as in, in the event of a real forced landing there are a good selection of fields to land in. Furthermore it is common practice and a special pleasure to fly low level, below 500ft AMSL, just offshore. Flight below 500ft AMSL but complying with the 500ft rule can be maintained easily.



The feasibility flights are scheduled to take place from 12th Feb 2023 for 90 days. We will continue to work with the CAA and aviation community to help develop a roadmap for integration of new airspace users rather than segregation.

3. Other GA pilots from Eshott and numerous other airfields use this area. This includes aircraft in transit who frequently follow the coastline for easy navigation and because the weather is usually better for flight safety and comfort. Many of these pilots fly at low level for pleasure but sometimes because of weather. (I suspect that not all of these pilots check NOTAMS. They SHOULD but that does not mean they DO, so there is increased risk of collision. The "visual mass" of a small drone will heighten this risk.

We have contacted Eshott airfield and local airfields as part of our stakeholder engagement, a full list can be found in annex B.

In addition to publishing the required NOTAMs, Newcastle ATC have agreed to provide a Danger Area Activity Information Service for updates to local airspace users. We will only be operating during VMC, and the UAS is fitted with strobe lighting as well as ADS-B in/out.

4. Birds can be frightened by overflying objects. All pilots are taught to respect bird sanctuaries and breeding sites. For example, we would never fly over the Farne islands, which is included in the proposed area. The relevant authorities should be consulted.

We have contacted Farne Islands (National Trust) as part of our stakeholder engagement, a full list can be found in annex B. The TDA provides safe airspace for the facilitation of the feasibility flights, therefore the UAS will be in the centre of the TDA, approx 1nm from the coastline and will avoid flying over locations such as the Farne Islands.

Almost all of the negative impacts above could be avoided by moving the TDAs offshore wherever possible. Clearance from the shoreline of as little as 2 miles would dramatically lessen the negative impacts.

The proposed TDA is over water wherever possible to avoid any inconvenience to the GA community (i.e small aerodromes in the region and the areas of Intense Microlight Activity). However, we are conscious of the need to safely vacate the airspace for emergency services use and therefore have arranged a small number of contingency landing sites along the route which can be utlised if required, hence the need for the TDA to overlap the land.

If you would like to discuss any of these points with us further, please do not hesitate to contact me and we can arrange a time for a call.

Kind regards,





b. ARPAS

Final request for support to ACP-2022-031

4 November 2022 at 16:19



ARPAS UK fully supports Apian's TDA request for ACP-2022-031. We believe that additional trials of this nature will help collect more operational data from a medical transport perspective as well as advance efforts to integrate rather than segregate airspace. We welcome the use of TDAs to move further towards achieving these objectives.

Regards







c. Borders Gliding Club

Name	
Email	
Representing	Borders Gliding Club, Milfield
Address (including postcode if possible)	Borders Gliding Club, Milfield Airfield, Wooler, NE71 6HD

Feedback:

ACP-2022-031 will not have any impact on the operations of Borders Gliding Club, Milfield, providing the current boundaries and height limits of the proposed Temporary Danger Area (TDA) remain as shown. A conflict may arise should the boundary of the TDA be moved further west.

Borders Gliding Club supports this excellent initiative and wish it every success.

5 November 2022 at 20:59

Thank you very much for yours and the Borders gliding Club's support. We do not anticipate the TDA being moved any further to the West.

Your comments will be shared with the CAA as part of our stakeholder feedback.

Kind regards



d. British Gliding Association

Stakeholder Engagement ACP-2022-031

20 September 2022 at 14:51

Thanks for the engagement.

The ACP as described does not impact gliding. We have no comments at this stage.

Kind regards

British Gliding Association



e. British Hang Gliding and Paragliding Association

Stakeholder Engagement ACP-2022-031

9 September 2022 at 11:52

Thank you for your email.

Please note that hang gliders and paragliders routinely fly from surface to cloudbase.

For your information, I attach a link to the BHPA's Electronic Conspicuity paper giving information on hang gliding and paragliding activity in the UK (link).

The BHPA club local to the area in which you propose a TDA is Northumbria Hang Gliding and Paragliding Club and it is essential that you contact this club to identify locations used by these aircraft.

I have copied the club's email address and the BHPA's Airspace Liaison Officer into this email.

Kind regards



Web: www.bhpa.co.uk

British Hang Gliding and Paragliding Association (BHPA)

8 Merus Court, Meridian Business Park, Leicester, LE19 1RJ, England

Tel: 0116 289 4316 Fax: 0116 281 4949

British Hang Gliding and Paragliding Association Limited. A company limited by guarantee and registered in England no 2618166 Registered office: 340 Melton Road, Leicester, LE4 7SL

Stakeholder Engagement ACP-2022-031

15 September 2022 at 14:11

All,

Following on from Mark's email, I have included the email and documentation around our proposal for a temporary danger area in the area of Northumbria to support NHS UAS feasibility flights towards the beginning of next year.

If you have any questions or you would like to discuss in more detail please contact me and I will be happy to schedule a call.



f. Bristow

See Summary stakeholder engagement TOI



g. British Helicopter Association

	:::		
Name			
Email			
Representing		ВНА	
Address (including postcode if possible)			

Feedback:

We trust all Dangerous Air Cargo legislation will be obeyed and you have the required approvals?

What electronic conspicuity is the drone fitted with?

Noting the operating times, the drone will be flying at night. Does it have a full lighting fit?

Is there any intent to conduct IFR operations?

Stakeholder Engagement ACP-2022-031

14 September 2022 at 14:45

Thank you for your questions. Please see responses to them below:

We trust all Dangerous Air Cargo legislation will be obeyed and you have the required approvals? Yes, for operations that are carrying dangerous air cargo, all regulatory approval will be sought and followed.

What electronic conspicuity is the drone fitted with? The UAS will be equipped with ADS-B IN & OUT

Noting the operating times, the drone will be flying at night. Does it have a full lighting fit?

Yes, we would like to operate the TDA until 18:15, this is in support of the requirements of the NHS to transport medical goods at this time.

The UAS is equipped with a strobe and navigation lights, which are operated at all times (day or night).

Is there any intent to conduct IFR operations? We will be operating in VMC conditions only to ensure our aircraft is visible to other traffic.

If you would like further information please do not hesitate to contact us, we are happy to support a call if you would prefer.

Kind regards





h. DAATM

Name	
Email	
Representing	Ministry of Defence (MOD)
Address (including postcode if possible)	DAATM, Aviation House, 1E Beehive Ringroad, Crawley, RH6 0YR

Feedback:

Please accept this feedback from Defence Airspace and Air Traffic Management (DAATM) which represents views from across the Ministry of Defence (MOD). The MOD wish to thank Apian for the engagement on this ACP.

The MOD are aware of the importance and nature of the task and are committed to help provide a workable solution for all airspace users. Whilst the MOD do not object to the proposal, we believe that there are potential airspace user conflictions that require addressing with the proposal as it currently stands. There are two main areas of concern for the MOD with this proposal, both of which we believe have relatively straightforward mitigations to enable all activity to take place.

Firstly, the TDAs will be located in a similar area to large military exercises that are taking place within Temporary Danger Area (TDA) EG D597, as described in AIP Supplement 062/2022, linked below.

EG Sup 2022 062 en.pdf (ead-it.com)

Whilst the TDA itself has a lower limit of FL85 and therefore naturally deconflicts with your TDA, there may be a greater than usual number of military air systems including helicopters that will be operating in the vicinity of the proposed TDAs at low level. Additionally, over land in the Northumberland area, there may be deployed emitters which are utilised in support of these exercises, with the resulting HIRTAs potentially forming a hazard to the RPAS that you will be operating within the TDA. As listed in the AIP SUP, the planned activation dates for military exercises to take place within the time period of your proposal are for 12 activations of EG D597 between 6 Mar 23 and 24 Mar 23. The MOD believe that prior deconfliction of activations times of all TDAs may help mitigate the impacts on both sides. For more details on activation times and the type of equipment used, DAATM can provide you with the relevant points of contact within 92 Sqn who plan and run the military exercises.

Secondly, and as with other similar TDAs across the UK, there may be occasions where the military require short-notice, unplanned entry into/through the TDA in the interests of National Security, Standing Home Commitments or for other operational tasks. The length of the proposed TDAs along the coast and the proximity to various sensitive facilities in the area could cause delays to such MOD operations. Whilst unlikely, it is a possibility and therefore the MOD would like to discuss gaining access at short-notice, akin to how the emergency services and other Cat A flights would gain access (as discussed in a recent email). Some form of rapid



communication with the TDA, or UAV/RPA, operator would be required. Having relevant TDA contact information on the NOTAM is one way of achieving this if a radio frequency, or DACS are not available for other airspace users.

In the interests of flexible use of airspace, the MOD agree that the relevant TDAs should only be activated for the times required to conduct the individual flights. Having canvassed opinion across the military low flying community, the proposed TDAs are in an area where military low flying takes place but the overall impact (outside of the large exercises described above) would be minimal as crews would plan to avoid the active TDAs once aware of their status via NOTAM.

Please do not hesitate to contact DAATM if you have any further questions or require MOD contacts to liaise with reference any of the content contained above.

ACP-2022-031 deconfliction against military exercise

ctober 2022 at 11:24

As you will see below I have been provided your emails from

I am contacting you following feedback provided through DAATM on our airspace change process requesting a Temporary Danger Area in Northumbria (ACP-2022-031).

From the feedback DAATM has provided, we understand that there is a military exercise scheduled for 6 - 24 March 2023 which is taking place in TDA EG D597, as described in AIP Supplement 062/2022.

I understand you are the individuals responsible for the planning and running of the exercise. Could we arrange a virtual meeting with yourselves to allow us to gain a better understanding of the exercise (activation times, type of equipment being used). This would allow us to assess the impact on our proposed operations and work with you to identify a deconfliction plan/process.

Kind regards



ACP-2022-031 deconfliction against military exercise

I have looked at the area in detail; and whilst it is inconvenient – it will likely have little impact on what we are trying to achieve and will also add a sense of reality into constraining the low level traffic and what they can do.
From the looks of it, we should be able to deconflict and provide the timings of CW traffic – we will also establish Comms vs the POCs to ensure we track each other's activity.
We may even look to use your flying windows – in the sense of creating a problem for our targeting process?
TEAMS/WEBEX usually works best for us / if you send me a date/time I can arrange the meeting.
Thank you

For further email exchange see Summary stakeholder engagement TOI



i. English Heritage

Name	
Email	
Representing	English Heritage
Address (including postcode if possible)	Duntansburgh Castle, Near Craster, Northumberland

Feedback:

Risk assessment need to see Contingency plan – what if the drone or items being delivered fall on site? Route as the area in red is quite a wide area

How often these will happen

Will the drone have contact details if we need to return it or an item falls on site and they need to retrieve it?



Stakeholder Engagement ACP-2022-031

22 at 10:49

Thank you very much for your feedback.

I would like to reassure you that the technology that we are using for this project has been tested and used successfully across the UK and overseas in other projects. We take the safety of our operations and the impact on others extremely seriously, and have highly qualified and experienced individuals working on this project to ensure our operations are completed as safely as possible.

The Civil Aviation Authority (the aviation regulator) is involved in all aspects of approval for these feasibility flights. They consider the airspace and ground risk, with the UAS operator requiring CAA approval for these specific flights before we can start our operations.

The items we are delivering will be housed safely within the UAS. <u>Here</u> is our UAS operator, (Skyports) website where you can find out more about the UAS and operations.

The red lines on the charts define the boundaries of a Temporary Danger Area which affects other airspace users. The drone will fly a route in the centre of this area. This is to ensure that other operators within the area, and the UAS, are safely separated.

Flights will be conducted from 13 Feb - 12 May 2022, Mon-Fri. Times of planned operations can be found in the stakeholder engagement material previously shared and can be found on the airspace change portal (ACP-2022-031).

There will be contact details on the NOTAM for our operations, or you can contact us via <u>airspace@apian.aero</u> for any non-urgent questions. However, it is highly unlikely that items will fall onto site, as significant testing, mitigations and redundancies are in place to prevent this.

If you would like to discuss in more detail, please do contact me and we can arrange a time to meet.

Kind regards



i. Eshott Airfield

Name	
Email	
Representing	Eshott Airfield
Address (including postcode if possible)	Eshott Airfield, Felton, Morpeth, NE659QJ

Feedback:

Firstly, we appreciate that steps have been taken here to liaise with a number of stakeholders. We have two points to add which we wish for you to consider.

Firstly, put very simply, if the route of the drone aircraft were to move east by even a few hundred yards, our local businesses would be entirely unaffected. The route as it stands causes some difficulty with flights along the coast which on some occasions may be carried out at a minimum of 500ft. The document reads that you may require 400ft AGL corridor for the UAVs, which would remove some capability for scenic and training flights in that area over the sea (height of ground will be higher over the sea circa 800ft?). A move a few hundred yards out to sea would give a clear visual reference to pilots wishing to fly in that area at lower levels (for whatever reason that may be). I hope that you will consider this request. A couple of hundred yards further east over the sea would make a huge difference.

There is already significant drone activity at low levels in that area from sighting tourists with drone operated cameras, which may cause a separate issue Apian may not be aware of.

We appreciate the need for the UAV's to fly inland to reach Alnwick, and think that the route taken is generous for local GA pilots as a corridor, which is again appreciated although would hope that the ceiling of this corridor could be reduced slightly. Again we read this as 800ft AGL on the beach near Almouth which seems unnecessarily high altitude.

The second cause for concern is that a common route to the south is via the sea in the Newcastle area. Aircraft that are not given permission to cross the airspace via the overhead usually route over the sea at a maximum altitude of 1500ft to be below Newcastle's airspace. Your corridor in this location at 800ft AGL taking into account height of ground would give pilots a very narrow envelope to fly though, given that there may be poor weather in this area as is frequently the case.

The proposal overall seems reasonably sympathetic to GA users in the area. I think this will cause significant issues for the Coastguard and military, but that is not for me to go into. With some minor alterations we would have no objection at all.

Kindest regards





Stakeholder Engagement ACP-2022-031



Thank you very much for your feedback. I have added comments below, which provide you with some further information which you may find helpful.

Firstly, we appreciate that steps have been taken here to liaise with a number of stakeholders. We have two points to add which we wish for you to consider.

Firstly, put very simply, if the route of the drone aircraft were to move east by even a few hundred yards, our local businesses would be entirely unaffected. The route as it stands causes some difficulty with flights along the coast which on some occasions may be carried out at a minimum of 500ft. The document reads that you may require 400ft AGL corridor for the UAVs, which would remove some capability for scenic and training flights in that area over the sea (height of ground will be higher over the sea circa 800ft?). A move a few hundred yards out to sea would give a clear visual reference to pilots wishing to fly in that area at lower levels (for whatever reason that may be). I hope that you will consider this request. A couple of hundred yards further east over the sea would make a huge difference.

As a result of yours and others feedback we are reassessing the TDA dimensions to ensure as much as possible is over the sea and off the coastline. Some areas will be required to maintain over land, for example for landing sites.

To confirm the TDA heights; TDA A and C is 600ft AMSL and TDA B is 850ft AMSL.

There is already significant drone activity at low levels in that area from sighting tourists with drone operated cameras, which may cause a separate issue Apian may not be aware of.

Thank you for raising this concern. Should our proposal be accepted by the CAA, UAS operators requesting to fly VLOS within this area will require approval from us as TDA sponsors before being allowed to do so. UAS operating under VLOS should ensure safe separation is provided visually to others operating within the area.

We appreciate the need for the UAV's to fly inland to reach Alnwick, and think that the route taken is generous for local GA pilots as a corridor, which is again appreciated although would hope that the ceiling of this corridor could be reduced slightly. Again we read this as 800ft AGL on the beach near Alnmouth which seems unnecessarily high altitude.

Please see above regarding TDA ceilings. This is to ensure safe separation from any aircraft operating just outside the TDA is provided with the UAS operating a maximum height of 400ft AGL.

The second cause for concern is that a common route to the south is via the sea in the Newcastle area. Aircraft that are not given permission to cross the airspace via the overhead usually route over the sea at a maximum altitude of 1500ft to be below Newcastle's airspace. Your corridor in this location at 800ft AGL taking into account height of ground would give pilots a very narrow envelope to fly though, given that there may be poor weather in this area as is frequently the case.

In addition to the clarification of the TDA ceilings above. Our UAS operations must have a minimum of 1500 ft cloud base, and therefore if the met conditions are below this, we are not permitted to operate and the TDA will be deactivated. Deactivation processes will be followed. Contact details will be



available on the NOTAM for any one wishing to confirm the status. A DAAIS service will also be provided.

The proposal overall seems reasonably sympathetic to GA users in the area. I think this will cause significant issues for the Coastguard and military, but that is not for me to go into.

We have been working with the Coastguard, Military and other emergency service operators to ensure they can gain safe access to the Temporary Danger Area to conduct their operations with the use of agreed Temporary Operating Instructions. We value the support we have received from all of them in ensuring we get to an appropriate procedure.

With some minor alterations we would have no objection at all.

Thank you again for your feedback. We appreciate the time it has taken for you to review and respond. If you have further questions please do not hesitate to contact us.

Kind regards



k. Helicentre Aviation

Name		
Email		
Representing	Helicentre Aviation Ltd	
Address (including postcode if possible)	Leicester Airport Gartree Road Leicester LE2 2FG	

Feedback:

Many thanks for seeking our input into the proposed TDA. Helicentre Aviation do operate in the area conducting low level pipeline survey work. Our aircraft operate at 500ft AGL conducting visual inspections of various pipeline routes.

I do not foresee the proposal causing too much disruption however ares on particular concern:

Ashington within the south tip of Area A.

Line running North/South west of Shilbottle just outside Area B

Line terminating just South of Berwick Upon Tweed just outside area C

With the upper limit of 600ft in Area A we should be able to operate above this.

17 October 2022 at 16:08

Dear

Thank you for your feedback to our ACP 2022-031 proposal, we will ensure this is included in our submission to the CAA.

We would be grateful if you would be able to share more information (i.e maps indicating the routings) with us regarding the routing and potential timings of your survey work you mention in the feedback. This would allow us to see how we may limit any impact on your operation.

If you are able to facilitate a virtual meeting with us to discuss further that would be much appreciated.

Kind regards







1 November 2022 at 10:09

Just contacting you reference my email below to see if you have time to discuss?

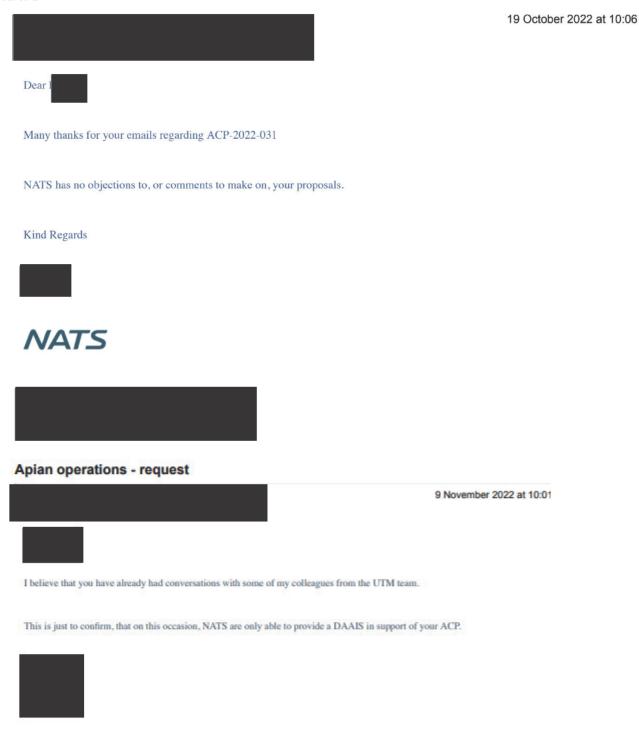


I. MCA

See Summary stakeholder engagement TOI



m. NATS





n. Newcastle Limited

See Summary stakeholder engagement TOI



o. NPAS

Name	
Email	
Representing	National Police Air Service
Address (including postcode if possible)	WYP HQ Wakefield WF1 3QP

Feedback:

This proposal would have little impact on Police Air Support operations due to the coastal routing and <400ft vertical dimensions.

Providing that a NOTAM giving contact details for the operator is provided then we judge the risk of confliction to be ALARP.

For further email exchange see Summary stakeholder engagement TOI



p. Otterburn

Name			
Email			
Representing	Otterburn Training Area MOD		
Address (including postcode if possible)	Otterburn Training Area, Otterburn, Newcastle-Upon-Tyne, NE19 1NX		

Feedback:

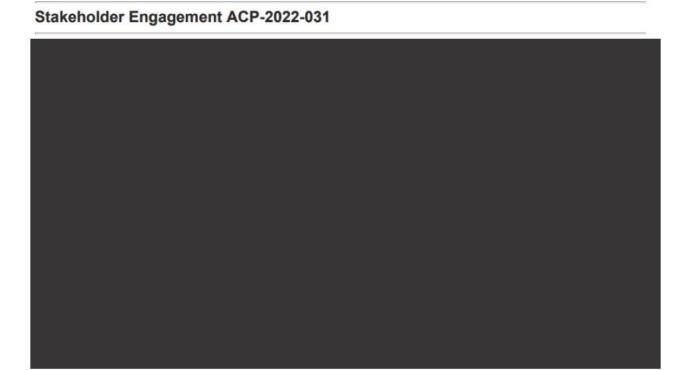
As the Training Safety Officer at Otterburn Training Area I am responsible for all air activity and live firing operations in Air Danger Areas D512A and D512B. I have read the information you kindly sent, if your UAS activity remains withing the area shown (A,B and C) then it will not conflict with our training.

If the area of your proposed activity changes and you fly further to the West then please let me know.

Regards



q. Initial email to stakeholders



Dear Stakeholder.

Request for support to <u>ACP-2022-031</u> Northumbria Healthcare NHS Foundation Trust feasibility flights within a Temporary Danger Area.

I am writing to you on behalf of Apian who are a medical logistics startup founded by NHS doctors with support from the NHS Clinical Entrepreneur Programme. We work on behalf of the NHS to operationalise uncrewed air system (UAS) technology and research its impact on patient health outcomes and staff wellbeing.

Apian, in conjunction with the Northumbria Healthcare NHS Foundation Trust is looking to conduct feasibility flights using UAS between its hospitals to provide a regular, on-demand delivery service for the distribution of medical products. These flights will allow us to research, validate and provide vital data to establish whether the use of UAS in these clinical settings will lead to improved patient care.

As part of the airspace change process, we have identified you as a key stakeholder. We have attached the full details of our proposal. We have also included a feedback form which we kindly request you to return to us before the 4th November 2022, and look forward to receiving your confirmation of support.

If you have any further questions or would like to discuss the project in further detail, please do not hesitate to contact me.

Kind regards,



r. First reminder email to stakeholders



Dear Stakeholder,

Follow-up email to request for support to <u>ACP-2022-031</u> Northumbria Healthcare NHS Foundation Trust feasibility flights within a Temporary Danger Area.

Following on from my previous email (on 9th September) regarding the request for your support to ACP-2022-031. I am pleased to be able to provide you with further information on the UAS platform we will be using for the feasibility flights, as well as offer additional support and information on the project to enable you to support our proposal.

Firstly, we are pleased to confirm that the UAS operator we have tendered for this trial will be Skyports.

Skyports are a drone services provider who specialises in Beyond Visual Line of Sight delivery, survey & surveillance in complex environments. Their knowledge and experience of operating in the UK and overseas make them the perfect partner for us to conduct these flights. You can read more about Skyports on their website here, and below is a summary of the UAS platform we will be using for your information. Skyports will be responsible for UAS operations, Apian will remain the TDA sponsors.

I also would like to take this opportunity to remind you that the stakeholder feedback for our proposal is currently open, and we kindly request you to return feedback to us before the 4th November 2022 which will be shared with the CAA. Full proposal details can be found on the CAA Airspace Change Portal through this <u>link</u>.

These feasibility flights remain extremely important to the Northumbria Healthcare NHS Foundation Trust, allowing Apian to research, validate and provide vital data to establish whether the use of UAS in these clinical settings will lead to improved patient care.

If you would like to discuss in more detail any questions or concerns you have, please do not hesitate to contact me and I will be happy to arrange a video call with you to discuss in more detail.







Type	Swoop Kookaburra Mk III. Hybrid – Powered Lift transitional platform (VTOL)			
Max speed	68kt			
Cruise speed	60kt			
Max endurance	68 mins (forward flight limit at MTOW)			
Max payload	3kg			
MTOM/MTOW	17kg			
Lighting	Navigational lights and a white strobe			
Max. wind	27 kts (14 m/s) from any direction			
Min visibility	Min. 1500m at Take-off and Landing Points.			
Min. visibility	Flights will comply with visual meteorological conditions (VMC).			
Precipitation	Moderate rainfall (2mm – 10mm per hour)			
Cloud ceiling	No limitation			
Min. / Max. Operating	0°C / +45°C			
Temperature	0455000 044507 99			
	The UA is fitted with ADS-B IN and OUT, which can process uncertified ADS-B			
	signals, namely SIL/SID=0.			
Electronic Conspicuity	***Called *** (a 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1			
	Note: This is only for RP's situational awareness and is not used as a tactical means of deconfliction.			



s. Second reminder email to stakeholders



Dear Stakeholder,

Follow-up email to request for support to ACP-2022-031 Northumbria Healthcare NHS Foundation Trust feasibility flights within a Temporary Danger Area.

Firstly, we would like to thank those of you who have responded to our request for support for our ACP application (ACP-2022-031). We greatly appreciate the time it has taken you to review and comment.

Secondly, we would like to highlight to those who are yet to comment that our stakeholder feedback for our proposal is scheduled to end this Friday, 4th November 2022. We would kindly like to request for your formal feedback and support to allow us to include in our CAA submission. Full proposal details can be found on the CAA Airspace Change Portal through this <u>link</u>.

Thank you in advance for your engagement and any responses. If you would like to discuss in more detail or have any questions, please do not hesitate to contact me and I will be happy to arrange a video call with you to discuss in more detail.

Kind regards,	



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Dear Stakeholder,

<u>Final request for support to ACP-2022-031 Northumbria Healthcare NHS Foundation Trust feasibility flights within a Temporary Danger Area.</u>

Further to my previous emails, we would be keen to receive your feedback on our proposed airspace change proposal (ACP 2022-031). Today is the final day for stakeholder feedback which will be included in our CAA submission.

Thank you in advance for your engagement and any responses thus far. If you would like to discuss anything in more detail or have any questions, please do not hesitate to contact me and I will be happy to arrange a video call with you.

Kind regards,