



Maritime &  
Coastguard  
Agency



## English Channel Airspace Requirements – (ACP 2021 088)

Stage 2A: Options Development – Airspace Design Options  
24 February 2023.





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## Executive Summary

This report documents the Stage 2A – Options Development (a subset of Stage 2 - Develop & Assess) and corresponding stakeholder engagement undertaken as part the Civil Aviation Authority (CAA) Airspace Change Process (CAP1616) for the Airspace Change Proposal (ACP-2021-088).

As part of Stage 2A BHL undertook a variety of stakeholder engagement activities to inform and shape the initial airspace design options, with the formal engagement taking place over the period 21 Dec to 24 Feb 23. A baseline and initial airspace options were developed (Annex D) and sent to stakeholders for their feedback, Stakeholder Engagement Letter and questionnaire (Annex A) were sent to 129 stakeholders, a further 5 stakeholders made contact during the initial engagement, taking the total stakeholders to 134.

### The following conclusions were made:

- Option 1B was ranked by stakeholders as their preferred option, with Option 2 being the least favoured
- The majority of the feedback received agreed that the airspace options aligned to the design principles.
- The general consensus from stakeholders was that option 2 (based on airspace corridors) reduced safety irrespective of the locations and should be discounted on safety grounds. There were also some significant environmental (Noise) concerns, around corridors again irrespective of location. Both of these themes will be picked up in the design principle evaluation.
- The baseline will be developed with third party data, which is currently ongoing with an amended baseline for following ACP stages.
- Detailed consideration of the airspace management constructs must be progressed as part of discussions to identify and agree a DAAIS and DACS provider. This should include operating times / hours, radar, radio and deconfliction services.
- The segregated airspace included within this ACP is based on EG D098, this should be reviewed to ensure the minimum volume of airspace is included to enable the delivery of UAS to meet the statement of need.

The out of this engagement was the refinement of the three draft airspace design options, the detail of which can be found at page 18.





## Introduction

The Department for Transport (DfT) has been requested to expand routine situational awareness (SA) patrols of the English Channel. This expansion is due to the increased levels of small boat crossings which regularly result in Search and Rescue (SAR) operations following multiple '999' calls. Based on the situational awareness from the UAS, HMCg decision makers can ascertain the scale and accurate location of an incident and mobilise the appropriate rescue assets. This essential State requirement is currently addressed by Bristow Helicopters Limited (BHL) utilising UAS deployed from Lydd Airport using the current temporary danger area (TDA) complex.

Due to the enduring nature of this requirement and in line with UK regulatory policy for TDAs, a permanent solution to replace the current English Channel TDA complex is needed to continue to support the UK Government's response in the region.

Therefore, BHL acting as the Change Sponsor are developing an Airspace Change Proposal on behalf of the Maritime and Coastguard Agency.

- ACP-2021-088 - [Airspace change portal \(caa.co.uk\)](https://www.caa.co.uk/airspace-change-portal)

The framework within CAP1616 – Airspace Change Process sets out a six-stage process to implement a permanent airspace change. This ACP-2021-088 having passed stage 1 is currently in Stage 2 of the CAP1616 process. Stage 2 has two steps Stage 2A – Options Development and Stage 2B – Options Appraisal.

- Step 2A requires the change sponsor to develop a first comprehensive list of options – to the extent that a list is possible – that address the Statement of Need and that align with the design principles from Stage 1 (Annex C – Page 12). See *Design Options version 5 dated 23 Dec 23*.
- The change sponsor preliminarily tests these with the same stakeholders it engaged with in Step 1B to ensure that they are satisfied that the design options are aligned with the design principles and that the change sponsor has properly understood and accounted for stakeholder concerns specifically related to the design options. *This document.*
- The change sponsor then produces a design principle evaluation that sets out how its design options have responded to the design principles.

*Reference: CAP1616 Mar 21, Pg39, Para 125*

The outcome of this work will be the refinement of the airspace design options following the incorporation of stakeholder engagement.



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This document should be read in conjunction with:

- Stage 2A – Options Development: Design Principle Evaluation, dated 24 February 2023.
- Stage 2A – Design Options version 5, dated 23 Dec 23.
- Stage 1B – Stakeholder Feedback Post Stage 1B Engagement period, dated 13 Dec 23
- Stage 1B – Stakeholder Engagement Document (Design Principles), dated 22 Sep 23.
- Stage 1A – Statement of Need, dated 5 Jan 22.



## Pre-Stakeholder Engagement Summary

### Stakeholder identification and management

Stakeholders were identified, categorised, and prioritised using the methodology set out within the Stakeholder Engagement Strategy. Annex A includes the identified Stakeholders.

The decision was taken for stage 2 to include the stakeholders that had been engaged with during the stage 1B engagement. Stakeholders not included were those that had expressly requested to be removed (Annex B) from the process. However, the stakeholder list was reviewed and refined as part of stage 2A to ensure that appropriate stakeholder views continue to be considered.

Throughout the process the Stakeholder Strategy and Plan was used to ensure that stakeholders were managed appropriately.

### Initial Airspace Options

A baseline and three initial airspace options were developed, which were sent to stakeholders to gain their feedback, these options are summarised below and explained in detail within Annex D.

Considered Options	Description
Option 0 – Baseline / Do nothing.	The airspace environment that existed prior to the existence of the Temporary Danger Area (TDA) complex D098, based on Class G airspace.
Option 1A – Permanent Danger Area, with DAAIS only.	The transition of the current Temporary Danger Area (TDA) into a permanent Danger Area with a DAAIS as the airspace management construct.
Option 1B – Permanent Danger Area, with DAAIS and DACS.	The transition of the current Temporary Danger Area (TDA) into a permanent Danger Area with a DAAIS and DACS as the airspace management constructs.
Option 2 – Permanent Danger Area with an access corridor.	The transition of the current Temporary Danger Area (TDA) into a permanent Danger Area with "open" corridors to enable transit of other air users.



## Rationale for the development of the initial airspace options

The initial airspace options were developed using the framework below, which was carried forward from Stage 1B, and underpinned by the approved design principles from stage 1B:

1. Safety is of paramount importance when designing any new airspace solution moving forward. It is universally agreed that the new airspace structure should, as a minimum, maintain the current levels of safety provided by the existing TDA complex whilst exploring opportunities to increase this where possible.
2. In accordance with CAP722 and considering UAS capability across all current users of the TDA complex, any airspace solution must be compliant with the current regulatory framework for BVLOS UAS operation to be considered as a viable option.
3. The airspace design must consider the wider UK government response to small boat crossings in the region. The final design must satisfy the operational requirements of all users to maintain current response capability as a minimum.
4. The impact of airspace segregation is a key stakeholder concern, and airspace options should where possible seek to include mitigations that allow airspace access for other airspace users.
5. With the exception of the access route to Lydd Airport and Dover JRCC, UAS operations are conducted entirely over the English Channel. There is no requirement to conduct operations over land.

### Approved Design Principles:

Priority	Category (CAP1616)	Design Principle
1	Safety	Maintain or enhance current levels of safety.
2	Operational / Technical	Consider the requirements of all potential users.
3	Operational / Economic	Minimise the impact on other airspace users.
4	Policy / regulatory	Comply with UAS regulatory framework.
5	Operational / Technical	Operating area to be located over the sea.
6	Environmental / Operational	Minimise the noise and environmental impact on areas affected by the proposed change.

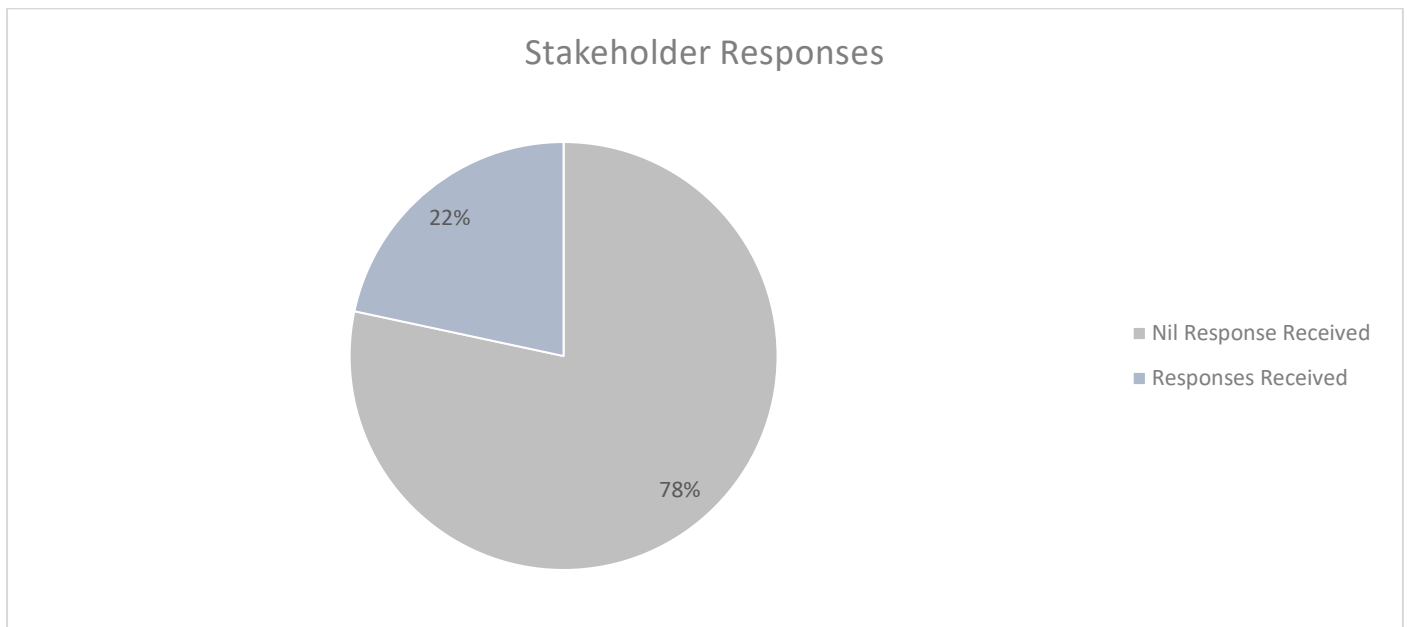


## Engagement Analysis

Following the receipt and collation of the received responses as part of the Stage 2A engagement 21 Dec 22 to 24 Feb 23, the feedback was analysed:

### Responses

From a total of 134 stakeholders that were included, we received 29 (22%) responses with the remaining 105 (78%) nil response.

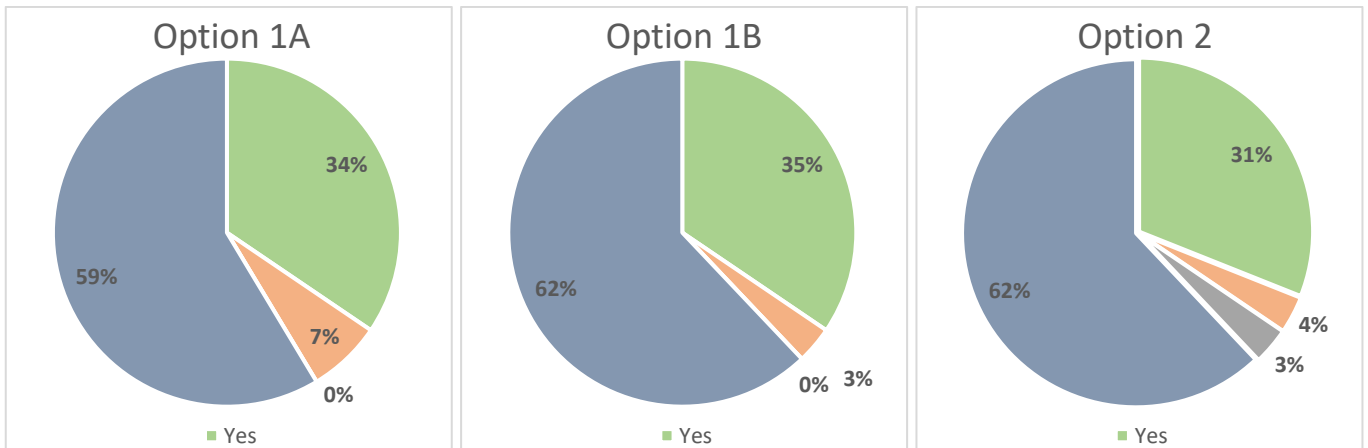


To interpret the feedback to the question for each option; Do you agree with the initial assessment against the agreed Design Principles? the responses were categorised into four responses against each of the three airspace options:

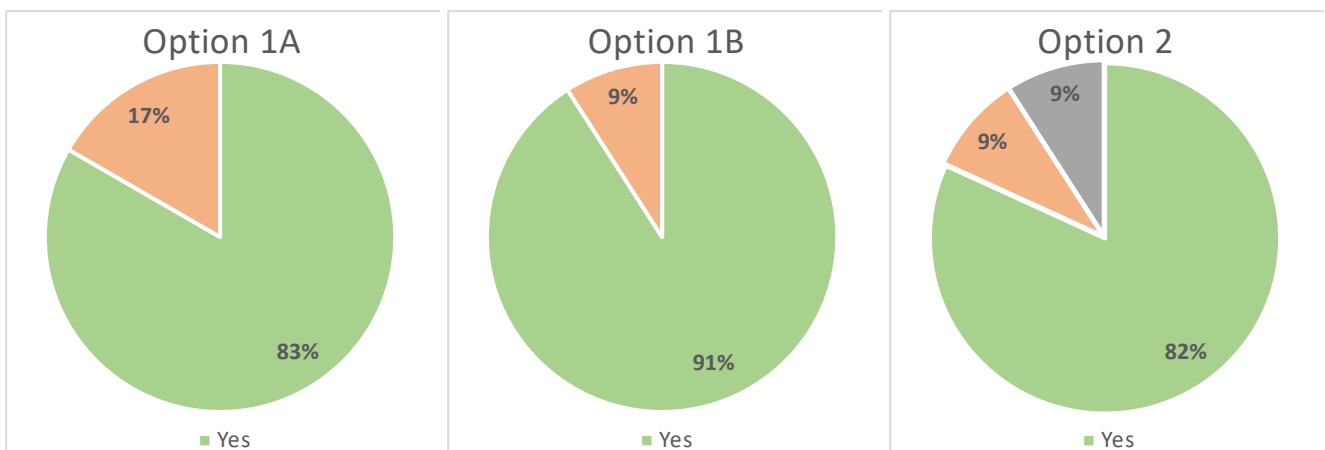
- Yes – Agreed with the initial assessment against the agreed Design Principles.
- No – Did not agree with the initial assessment against the agreed Design Principles.
- Partially – Partially agreed with the initial assessment against the agreed Design Principles,
- No Comment – Did not provide a comment regarding the airspace options assessment against the design principles.



The graphs below show this categorisation and the response percentages, for each of the initial airspace options.

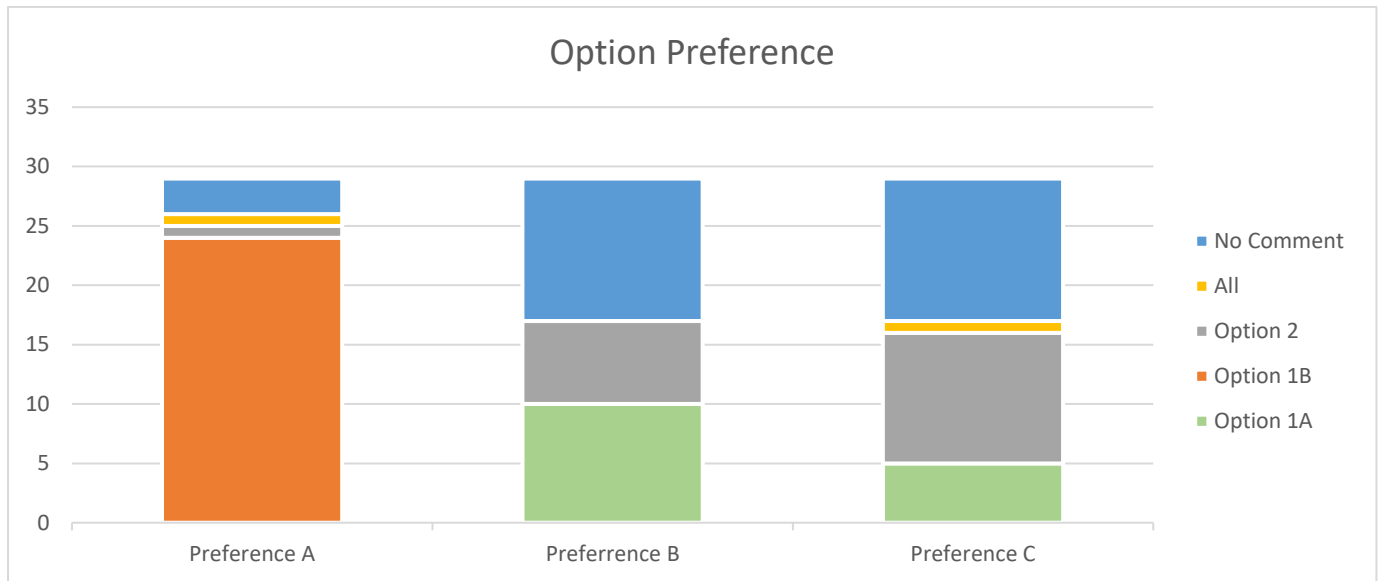


- These graphs evidence that the majority of respondents (31 to 35 %) agreed with the initial assessment against the agreed Design Principles, for all three of the airspace options. If the 'no comments' field is removed graphs below, this rises to 82 to 91%.





When further analysing the 29 (22%) of feedback provided against the three airspace options, this was further broken down into an order of preference of the initial airspace options.



The graph above evidences the preference allocated to each airspace option, however several stakeholders did not provide complete responses, just highlighting an overall preference. **It can be seen from the graph that Option 1B was the preferred option of the three.**

- Preference A - Option 1B was the most supported with 24 stakeholders selecting this as their most preferred option
- Preference B - Option 1A had the second most support with 10 stakeholders identifying this as their preferred option. This was closely followed by 7 stakeholders supporting Option 2 as their preferred option.
- Preference C – Option 2 received the least support and 11 stakeholders identified this as their least preferred option.



Themes raised by stakeholders

Themes raised	Summary of feedback	Our consideration
Safety	The use of corridors in option 2 are felt by the majority of respondents that this will reduce safety due to air traffic being funnelled both laterally and vertically.	Consideration will be given to what the dimension corridors would need to be to meet the design principle to maintain or enhance safety.
Danger Area Dimensions	<p>The quantity of air space and the way the current TDA complex is structured should be reviewed and revisited as part of this ACP, with the aim of segregating the minimum amount both laterally and vertically.</p> <p>Home Office - The reduction of airspace under EG098F as doesn't need to include airspace over land.</p> <p>Home Office requested that D098E, C, A, G be extended to include the shore line to facilitate additional UAS operations (reference feedback provided)</p>	<p>The dimensions of the Danger areas have been set by HMG to meet the statement of need and the vertical extend required to meet technical limitations of the UAS being employed. The lateral and vertical dimensions will be considered to ensure the minimum amount of segregated airspace will be sought under this ACP that is required to achieve the statement of need.</p> <p>The breakdown of the individual Danger areas that make up the segregated complex (EG D098), will be reviewed and considered in the next stage of the airspace design.</p>
Danger Area Management	The provision of a procedural deconfliction service by an Air Traffic Unit, to facilitate access to segregated airspace, in a safe manner.	The management and service provision for any segregated airspace as part of option 1A and 1B will be consider in the next stage of the airspace design.
Safety	Any option that includes a Danger Area must be designed and managed in such a way to ensure that Search and Rescue operations (incl. cross-border) can be conducted without delay.	We are and will continue to engage with UK, French and Belgium airspace regulators, as well as MCA who have responsibility for SAR Operations within UK waters to ensure that any option does not impede cross border SAR operations.
Airspace Access	Several stakeholders registered an objection to all of the initial airspace design options, on the basis of safety and that this does not align	For the statement of need to be fulfilled, segregated airspace is currently the only option to enable UAS operations.





	with the CAA Future Airspace Modernisation programme.	
Airspace Access	Option 1A will have a significant impact on airspace access for GA traffic operating VMC and under the ceiling of the Danger Area complex.	Option 1B includes a Danger Area Crossing Service to enable air traffic to transit through the segregated area.
Airspace Access	To enable maximum airspace access the amalgamation of option 1b and the corridors from option 2 should be implemented.	These will be considered in the next stage of the airspace design.
Baseline of Air Traffic	<p>The baseline included only includes air traffic in the vicinity of Lydd airport. There is a great deal more traffic and vastly more complex that needs to be considered to establish a valid baseline.</p> <p>In additional GA traffic and VMC traffic will take the shortest route possible over channel to reduce time over water.</p>	We are engaging with a third party to make available air traffic data in the vicinity of the airspace included within the ACP from 2019, to provide a more accurate baseline and exclude the effects of the current EG D098 TDA complex and Covid-19.
Airspace Access	The use of Electronic Conspicuity for DAA and other novel solutions as part of the ACP to improve situational awareness and provide a DAA solution thereby removing the need for segregation.	There are currently no CAA approved DAA solutions, and the timescales required to gain CAA approval for any novel technologies including DAA, exclude these from being included and therefore considered as part of this ACP.
Airspace Access	Any DACS provision as part of an airspace design should be available for daylight hours, to reduce the impact on VMC only capable air traffic.	The provision of a DACS is still under discussion to identify a suitable provider. This will be included in the consideration and design of the airspace management and specifically DACS provision.
Environmental	Concerns of increased noise over sensitive National Trust sites, if Option 2 implemented, due to the increased density of aircraft transiting an area because of the corridors.	This will be considered as part of the next stage in airspace design.



Danger Area Management	A dedicated radar and radio service should be provided as part of Option 1B, to ensure air traffic safety.	This will be considered as part of the next stage in airspace design.
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## Analysis

- 83 to 91% of stakeholders that responded agreed with the initial assessment of all three of the airspace options against the agreed Design Principles, when ‘no comment’ responses were excluded.
- Stakeholders ranked the initial airspace options in the following order of preference:
  - Option 1B – Most favoured
  - Option 1A
  - Option 2 – Least favoured.
- Themes raised by stakeholders:
  - The airspace corridors associated with Option 2, highlight that there are significant environmental (Noise) and safety concerns irrespective of the locations of this type of structure.
  - The baseline should be improved to included a more comprehensive air traffic picture of the area impacted by the ACP to ensure valid assessment of airspace options.
  - Airspace management constructs should consider the parameters of DACS and DAAIS provision particularly operating times, radar, radio and deconfliction services.
  - The segregated airspace included within this ACP is based on EG D098, this should be reviewed to ensure the minimum volume of airspace is included to enable the delivery of UAS to meet the statement of need.

## Conclusions

- Option 1B was ranked by stakeholders as their preferred option, with Option 2 being the least favoured.
- The majority of the feedback received agreed that the airspace options aligned to the design principles.
- The general consensus from stakeholders was that Option 2 (based on airspace corridors) reduced safety irrespective of the locations and should be discounted on safety grounds. There were also some significant environmental (Noise) concerns, around corridors again irrespective of location. Both of these themes will be picked up in the design principle evaluation.
- The baseline will be develop with third party data, which is currently ongoing with an amended baseline for follow ACP stages.



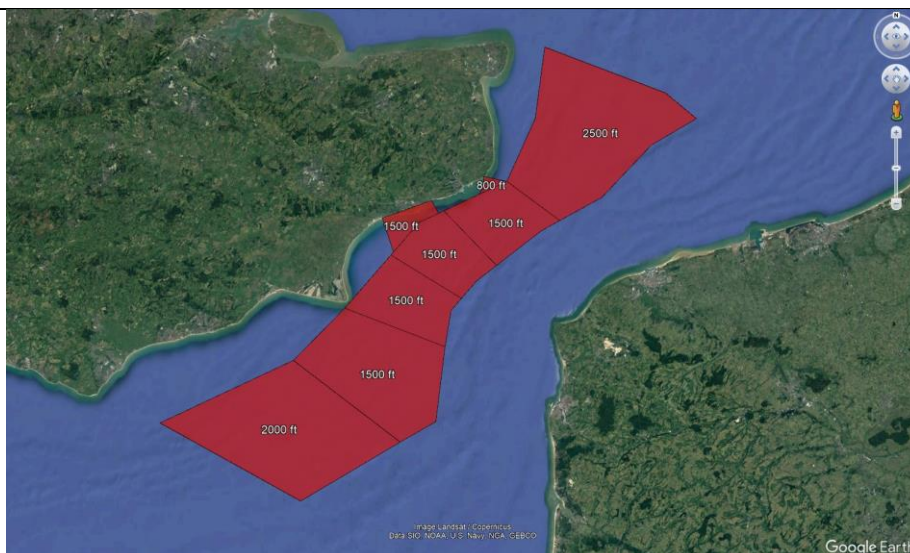
- Detailed consideration of the airspace management constructs must be progressed as part of discussions to identify and agree a DAAIS and DACS provider. This should include operating times / hours, radar, radio and deconfliction services.
- The segregated airspace included within this ACP is based on EG D098, this should be reviewed to ensure the minimum volume of airspace is included to enable the delivery of UAS to meet the statement of need.

## Draft Airspace Design Options Refinement

Throughout the engagement with stakeholders, the feedback received has been used to develop and refine the draft airspace design options. Detailed below is the output of this refinement, option 0 the baseline, is subject to further development and will be included in Stage 2B:

### Option 1A – Permanent Danger Area with a Danger Area Activity Information Service (DAAIS) Only

<b>Description:</b>
<ul style="list-style-type: none"> <li>• A permanent danger area (DA) established in Class G airspace, within the Channel.</li> <li>• The same volume of airspace as the totality of TDA D098 complex, both laterally and vertically, with some amendments to the individual Danger Areas that make up the complex (please see design section below).</li> <li>• The option includes a DAAIS only.</li> </ul>
<b>Design:</b>
<ul style="list-style-type: none"> <li>• The same lateral and vertical dimensions as TDA D098 complex (and as set in the images below).</li> <li>• Danger Area active up to 365 days a year, until no longer required.</li> </ul>



**DAAIS/DACS**

- DAAIS based on the active DA sectors in accordance with the activity set out within the NOTAM as currently.

**Promulgation:**

- Activated with minimum of 24 hour's notice and /deactivated when no longer required.
- Notification of the DAAIS Units within the NOTAM.



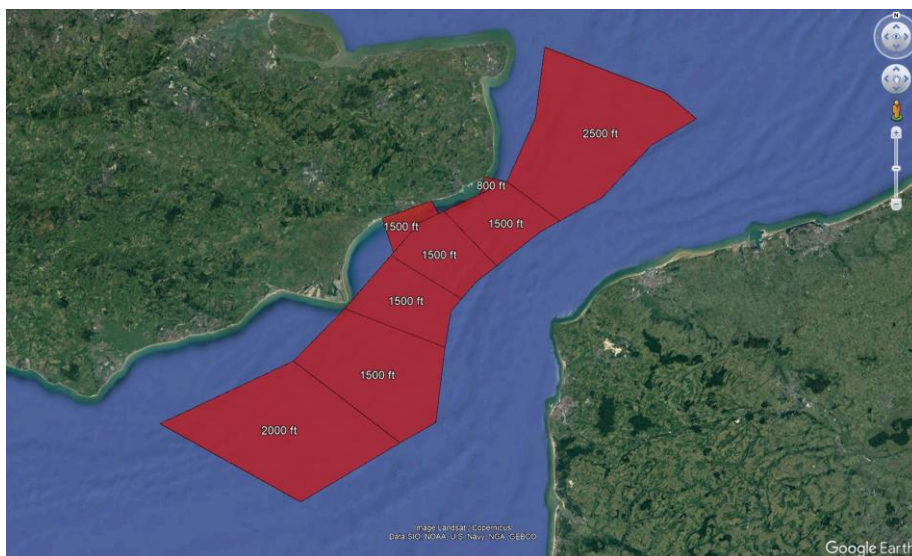
<p><b>Airspace Management:</b></p> <ul style="list-style-type: none"> <li>• DAAIS provided: <ul style="list-style-type: none"> <li>• 0830 – 1900 daily: Lydd APP 120.705.</li> <li>• 1901 – 0829 daily: London FIR 124.6.</li> </ul> </li> <li>• All Operators (UAS &amp; Manned) will need to notify Lydd ATC or London FIR dependent on time of day of the activity within the DA and work/monitor the RTF.</li> </ul>
<p><b>Coordination:</b></p> <ul style="list-style-type: none"> <li>• Daily check on planned activity (as now) with PPR for Lydd based UAS and manned SAR assets.</li> <li>• JRCC (ARCC) will continue to coordinate taskings within Danger Area (as currently).</li> <li>• All aircraft within DA will have to monitor frequency of service provider in line with time of day.</li> <li>• [REDACTED] would still be the discreet freq for UAS/UAS or UAS/SAR(H) / HMCG coordination / deconfliction, and in accordance with deconfliction plan.</li> <li>• GA Aircraft in distress (e.g. engine failure over Channel) given Cat A clearance priority, then SAR support.</li> </ul>
<p><b>Modifications:</b></p> <ul style="list-style-type: none"> <li>• Lydd APP freq DOC may need to increase to 40nm range to accommodate sector E. Important to retain existing frequency rather than an enforced channel change due to DOC requirements.</li> </ul>
<p><b>Resourcing:</b></p> <ul style="list-style-type: none"> <li>• Existing Lydd ANSP Certification/Designation sufficient for task.</li> <li>• Existing London FIR ANSP Certification/Designation sufficient for task.</li> </ul>

Option 1B – Permanent Danger Area with DACS and DAAIS.

<p><b>Description:</b></p> <ul style="list-style-type: none"> <li>• A permanent DA established in Class G airspace, within the Channel.</li> <li>• The same volume of airspace as the totality of TDA D098 complex, both laterally and vertically, with some amendments to the individual DA's that make up the complex (please see design section below).</li> <li>• The option includes a DAAIS / DACS to allow greater permeability for low level GA crossing under certain conditions.</li> </ul>
<p><b>Design:</b></p>



- The same lateral and vertical dimensions as TDA D098 complex (and as set in the images below)
- Danger Area active 365 days a year, until no longer required.



**DAAIS/DACS**

- Improved DAAIS based on the DA sectors in accordance with the actual drone activity, per sector, rather than the NOTAM activity as currently.



- This would enable a General Aviation crossing of an inactive sector (Slightly different to DACS which would be assisted/coordinated crossing of an active/occupied DA with a form of surveillance service).

**Promulgation:**

- H24/7/365 rather than activated /deactivated by NOTAM.
- Notification of the DAAIS/DACS Units within a note on the charted DA.
- Permanent charting will enable feed through to electronic flight mapping devices etc, enabling improved flight planning.
- This will reduce confusion over the activity, but the DAAIS/DACS enables flexible use of the airspace by all whilst facilitating more flexible UAS operations rather than to a pre-determined schedule.

**Airspace Management:**

- Basic Service (FIS) on Lydd APP 120.705 min equipment 2-way RTF.
  - 0830 – 1900 daily: Lydd APP 120.705.
  - 1901 – 0829 daily: London FIR 124.6.
- All Operators (UAS & Manned) will need to notify Lydd ATC or London FIR dependent on time of day of the activity within the DA and work/monitor the RTF.
- Lydd will keep movement data on flight progress strips to assist with ATS management. This includes AR3 at Swingfield, so all traffic using the DA is known to Lydd.
- Suggest that ADS-B is also required to assist Controllers with situational awareness.

**Coordination:**

- Daily check on planned activity (as now) with PPR for Lydd based UAS and manned SAR assets.
- JRCC (ARCC) will continue to coordinate taskings within Danger Area (as currently).
- All aircraft within DA will have to monitor frequency of service provider in line with time of day.
- █████ would still be the discreet freq for UAS/UAS or UAS/SAR(H) / HMCG coordination / deconfliction, and in accordance with deconfliction plan.
- GA aircraft requesting transit of Danger Area will make request on Lydd APP. Lydd Controller will check position of the various UAS (i.t.o Sector) and intentions. If inactive sector available for GA crossing, then this can be accommodated providing the higher priority SOLAS UAS or SAR(H) flight is not impeded.
- GA Aircraft in distress (e.g. engine failure over Channel) given Cat A clearance priority, then SAR support.

**Modifications:**



- Lydd APP freq DOC may need to increase to 40nm range to accommodate sector E. Important to retain existing frequency rather than an enforced channel change due to DOC requirements.
- ADS-B FID trial summer 2023 – not essential for DAAIS as described above, but will enhance SA and improve airspace management.
- VHF direction finder will need to re-instated to improve situational awareness for airspace management purposes.
- MATS2 update will be required, but procedures similar to D044/D141.

**Resourcing:**

- Existing Lydd ANSP Certification/Designation sufficient for task.
- Existing London FIR ANSP Certification/Designation sufficient for task.
- Additional workload created by Danger Area airspace management would be mitigated by improved VHF DF and ADSB-FID by improving Controller situational awareness of traffic transiting English Channel.

Option 2 – Permanent Danger Area with Corridors

**Description:**

- A permanent DA established in Class G airspace, within the Channel.
- An increased volume of airspace over TDA D098 complex, due to vertical ceilings increased to 2500ft across the DA complex, with some amendments to the individual DA’s that make up the complex (please see design section below).
- The option includes a DAAIS only.

**Design:**

- The same lateral dimensions as TDA D098 complex (and as set in the images below).
- Two one-way corridors across the DA to facilitate GA cross below 1500ft.
- Danger Area active 365 days a year, until no longer required.

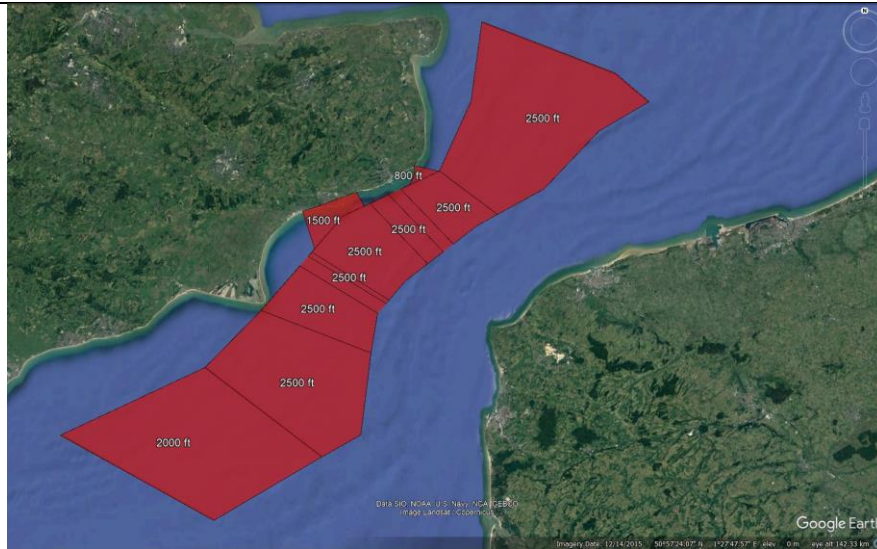


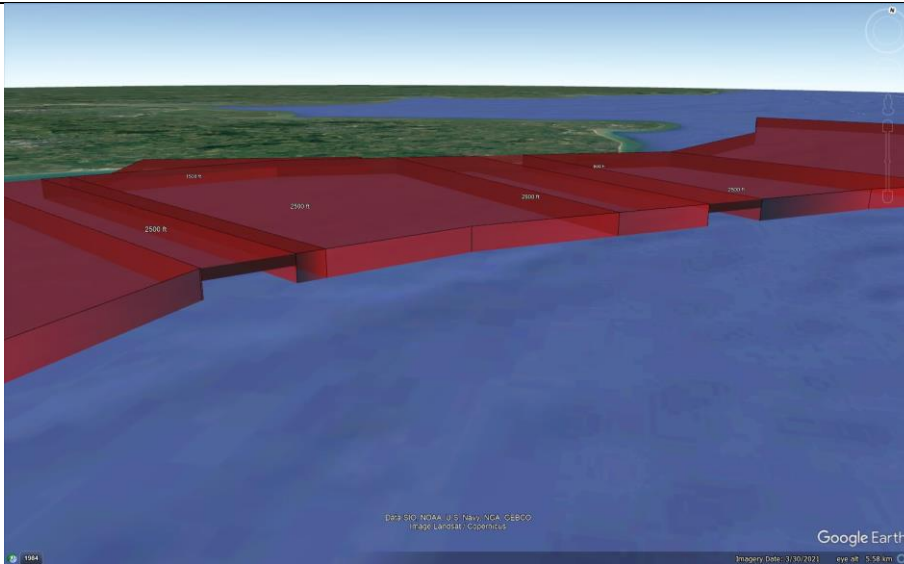


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Search and Rescue





**DAAIS/DACS**

- DAAIS based on the active DA sectors in accordance with the activity set out within the NOTAM as currently.

**Promulgation:**

- Activated with minimum of 24 hour’s notice and /deactivated when no longer required.
- Notification of the DAAIS Units within the NOTAM.

**Airspace Management:**

- DAAIS provided:
  - 0830 – 1900 daily: Lydd APP 120.705.
  - 1901 – 0829 daily: London FIR 124.6.
- All Operators (UAS & Manned) will need to notify Lydd ATC or London FIR dependent on time of day of the activity within the DA and work/monitor the RTF.

**Coordination:**

- Daily check on planned activity (as now) with PPR for Lydd based UAS and manned SAR assets.
- JRCC (ARCC) will continue to coordinate taskings within Danger Area (as currently).
- All aircraft within DA will have to monitor frequency of service provider in line with time of day.
- ████████ would still be the discreet freq for UAS/UAS or UAS/SAR(H) / HMCG coordination / deconfliction, and in accordance with deconfliction plan.



- GA Aircraft in distress (e.g. engine failure over Channel) given Cat A clearance priority, then SAR support.

**Modifications:**

- Lydd APP freq DOC may need to increase to 40nm range to accommodate sector E. Important to retain existing frequency rather than an enforced channel change due to DOC requirements.

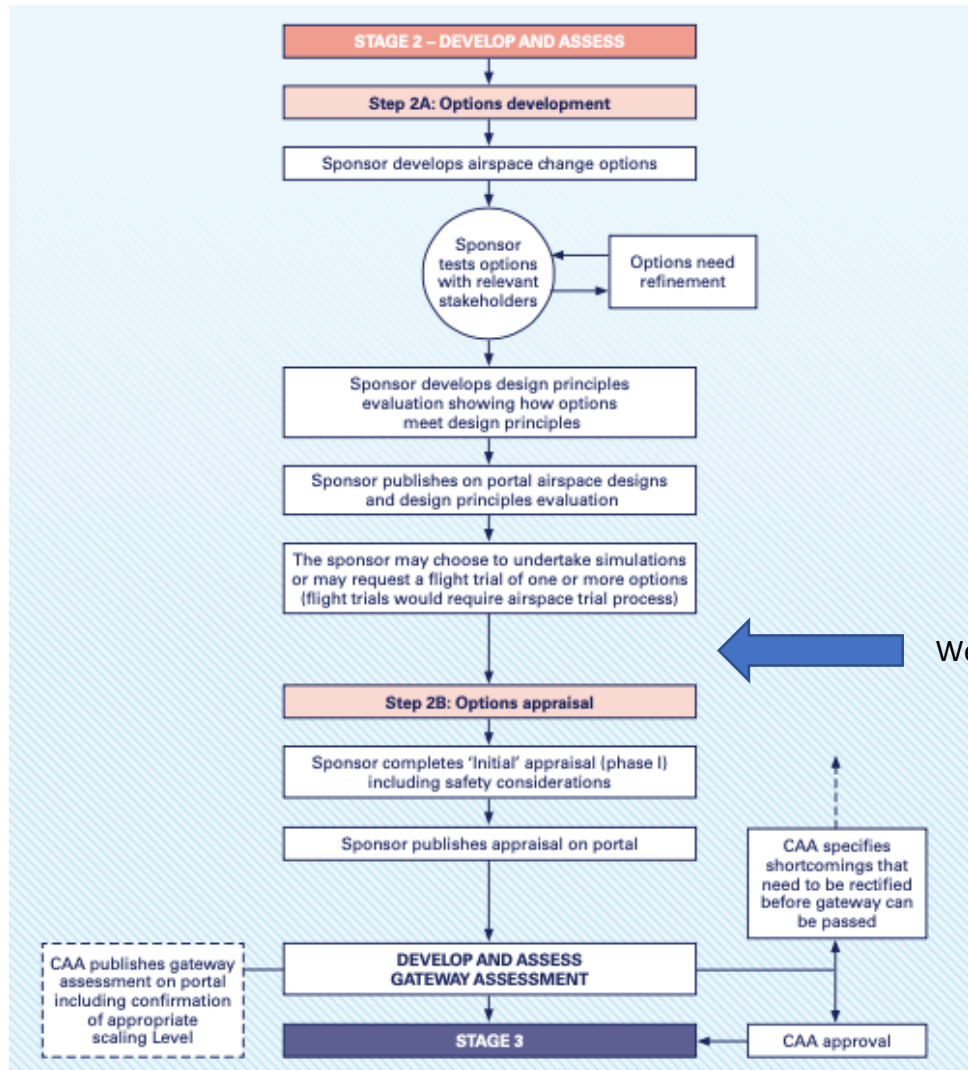
**Resourcing:**

- Existing Lydd ANSP Certification/Designation sufficient for task.
- Existing London FIR ANSP Certification/Designation sufficient for task.

## Next Steps

This document and the stakeholder engagement evidence has been submitted to the CAA for their review as part of the airspace change process. Following this the evidence from the initial options development will be published on the Air Space Change Portal along with the Design Principle Evaluation.

Once Stage 2A has been complete we will move to Stage 2B – initial options appraisal. In Stage 2B each possible option, even if there is only one, is assessed to understand the impact, both positive and negative. The change sponsor carries out the options appraisal against requirements set by the CAA in an iterative approach: the Initial appraisal is the first of three appraisal phases. These are uploaded to the ACP online portal prior to the CAA Develop & Assess Gateway scheduled for the 28 April 23.



We are here.



## Engagement Evidence – Stakeholders at Start of Stage 2A.

The section below includes the interaction with the stakeholders identified prior to the commencement of the engagement on the proposed design principles.

The stakeholder communications are arranged alphabetically by stakeholder and include those that took place between 21 December 2022 and 24 February 2023.

### 64253 - 2Excel Aviation

Date	Summary of Engagement	Method	Remarks
21 Dec 22	Commencement of Stage 2 and initial design options for feedback (Annex C).	Email	
11 Jan 23	Meeting with 2Excel Aviation to be walked through the three initial airspace options, prior to the development and provision of feedback.	Video Call	
30 Jan 23	Feedback on initial airspace options.	Email	
1 Feb 23	Response to feedback provided.	Email	

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

**Sent:** 01 February 2023 18:57

**To:** [REDACTED]

**Subject:** RE: 2Excel Aviation - Response to ACP 2021-08

Good evening [REDACTED],

Thank you for your feedback on the initial airspace design options which will be considered as we progress this ACP. In response to the 2Excel feedback specifically around the regulatory permissions and authorisations, we have provided the clarification below.



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2Excel -'In our view, the current measures in the internal deconfliction plan are not robust enough to provide the level of deconfliction that allows manned operations. This is in accordance with para 2.1.2 of CAP 722, which excludes manned aircraft from the designated airspace where UAS aircraft are operating'.

BHL Comment: -There is no reference within CAP722 V9.1 dated 22/12/22 para 2.1.2 that excludes manned aircraft from segregated airspace. CAP 722 does identify segregation as the primary means of deconfliction in the absence of approved Detect and Avoid (DAA) solution. However, In the absence of approved DAA solution, both CAP 722 (2.1.3) and UAS.SPEC 060(3)(b) detail an Alternative Means of Compliance (AMC) route via operational mitigation for Specific Category, BVLOS operations to reduce the likelihood of encountering another aircraft to an acceptable level. -The current TDA Channel Deconfliction Plan, approved for use by the CAA and agreed and signed by all UAS and manned aviation operators (with the exception of 2Excel) forms part of Bristow's operational mitigation but also that of Tekever's and the wider, manned aviation service providers operating within the TDA. Bristow's operational safety case and our subsequently awarded Specific category operational authorisation is supported by this deconfliction plan as approved by the CAA as an acceptable means of compliance.

We have included the relevant excerpts from CAP722 which provides the regulatory framework for UAS / RPAS for your reference:

**CAP 722 V9.1 dated 22/12/22 extracts below.**

**2.1.2. Avoidance of other aircraft** There are no right-of-way rules set out in regulation between unmanned aircraft and other airspace users, however it is likely that the unmanned aircraft remote pilot will identify other airspace users before they identify the unmanned aircraft, and therefore the remote pilot will usually be first to manoeuvre away from any conflicting aircraft. UK Regulation (EU) 2019/947 sets out, in UAS.OPEN.060 (2)(b), that: the remote pilot shall maintain a thorough visual scan of the airspace surrounding the unmanned aircraft in order to avoid any risk of collision with any manned aircraft. The remote pilot shall discontinue the flight if the operation poses a risk to other aircraft, people, animals, environment or property. Note: A similar requirement is set out within UAS.SPEC.060(3)(b), for the Specific Category. Although this places a responsibility for collision avoidance on the remote pilot, it does not absolve other airspace users from their own collision avoidance responsibilities. Neither does it imply any 'right of way' over UAS, by other airspace users. Remote pilots should be aware that their unmanned aircraft are generally difficult, if not impossible, to see from another aircraft until they are extremely close- particularly when flying within urban areas. Although many aerodromes are protected by FRZs, many unlicensed helicopter landing sites also exist, including hospital helipads. Such aircraft may loiter at low-level or land and take off unexpectedly. All of these types of helicopter operations may therefore be affected by VLOS operations particularly when approaching to land or departing from a site; UAS operators and remote pilots must take active precautionary measures to avoid affecting the safety of other airspace users, either by requiring them to take avoiding action, disrupting a mission or distraction (for example, aborting an air ambulance landing due to a UAS sighting). A NOTAM is generally not required to be issued for VLOS operations due to the typically small scale, duration and operating limitations of VLOS flights. The potential need for NOTAM action must form part of the operator's risk assessment process, particularly above 400ft (120m), outside of controlled airspace or when several unmanned aircraft will be operating together.



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**2.1.3. Beyond visual line of sight operations (BVLOS)** Operation of an unmanned aircraft beyond a distance where the remote pilot is able to respond to or avoid other airspace users by direct visual means (i.e. the remote pilot's observation of the unmanned aircraft) is considered to be a BVLOS operation. Unmanned aircraft intended for BVLOS operations will require either:

- A technical capability which has been accepted as being at least equivalent to the ability of a pilot of a manned aircraft to 'see and avoid' potential conflicts. This is referred to as a Detect and Avoid (DAA) capability. Further details regarding DAA can be found at 3.6. Note: Any DAA capability would be expected to comply with Regulation (EU) 923/2012 as retained (and amended in UK domestic law) under the European Union (Withdrawal) Act 2018: The Standardised European Rules of the Air (SERA) chapter 2 (avoidance of collisions), as adjusted by Rule 8 of the Rules of the Air Regulations 2015 (Rules for avoiding aerial collisions); or
- An operational mitigation, which reduces the likelihood of encountering another aircraft to an acceptable level, which may be achieved either using airspace segregation, or another suitable method of ensuring such segregation. Note: The primary means of achieving BVLOS operations without using a technical DAA capability, is using airspace segregation. It is not current CAA policy to accept a probabilistic safety argument based on historic traffic data as the sole component of a safety argument.

Specific category BVLOS AMC1 UAS.SPEC.060(3)(b) 'Operational mitigation'

#### AMC1 UAS.SPEC.060(3)(b) Responsibilities of the Remote Pilot

CAA ORS9 Decision No. 16

##### AVOID RISK OF COLLISION WITH ANY MANNED AIRCRAFT - WHEN BEYOND VISUAL LINE OF SIGHT

When operating BVLOS, the risk of collision with a manned aircraft must be mitigated sufficiently. This is achieved using either:

- A technical capability which shall reduce the overall risk of a mid-air collision, to an acceptable level (as set out in the AMC to article 11) based on the environment in which the aircraft is operating; or
- An operational mitigation, which reduces the likelihood of encountering another aircraft to an acceptable level.

The use of a probabilistic safety argument, to assess the likelihood of encountering other aircraft, is not an operational mitigation if used as the sole component of a safety argument.

Kind Regards,

#### **Bristow Search & Rescue**

Dyce Avenue  
Dyce, Aberdeen  
AB21 0LQ





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**From:** [REDACTED]  
**Sent:** 30 January 2023 15:39  
**To:** Airspace Change Proposal <airspacechangeproposal@bristowgroup.com>  
**Cc:** [REDACTED]  
**Subject:** 2Excel Aviation - Response to ACP 2021-08

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

Dear Airspace Change,

Please find attached 2Excel Aviation's response to the proposed air space change in the Channel.

Best Regards

[REDACTED]  
[REDACTED]  
[REDACTED]

**2Excel Aviation**

Tel: [REDACTED]  
[REDACTED]

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



**Aviation from a World-Class Team**

The information in this email is intended only for the addressee(s) named above. Access to this email by anyone else is unauthorised. If you are not the intended recipient of this message any disclosure, copying, distributing or any action taken in reliance on it is prohibited and may be unlawful; please reply to warn us of our error and delete the messages. 2Excel Aviation Ltd and / or its subsidiaries do not warrant that any attachments are free from viruses or other defects and accept no liability for any losses resulting from infected email transmissions.







#### **Introduction.**

2Excel Aviation is the UK Maritime & Coastguard Agencies Fixed Wing provider; we operate eight manned aircraft modified with advanced sensors and crewed by specialised aircrew. We have three operational task lines: one DA62 aircraft based at Lydd airport and two UK FW SAR aircraft permanently at high readiness for search & rescue based at Humberside. These assets are regularly tasked with supporting operations in the Channel. However, to date, we have been unable to (in our view) safely and legally operate within TDA 098 when it is notified as active. This has already had an operational impact by not being able to support vessels and persons in distress during live SAR operations promptly.

#### **Any change to the airspace must specifically allow manned coastguard fixed-wing aircraft operations within this airspace.**

We fully support the continued use of the danger areas to provide segregated airspace to UAS aircraft. We've been working closely with the operators for the last three years to aid them in delivering its complementary capability with high operational success.

#### **Specific Feedback:**

##### **Option 0. Class G airspace with no segregated airspace in the form of a TDA or DA**

This option returns the airspace to its previous Class G status; it would give manned SAR assets complete freedom of manoeuvre but at the expense of UAS operations. This would impact the operational effectiveness of HMG operations in the Channel and the significant investment in UAS capability.

This option would prevent the continuation of UAS operations. Our operational experience gained whilst supporting this task for the last 3-years has demonstrated that migrant crossings can occur across the entire existing TDA complex. Ultimately this would increase the risk to those persons crossing the channel by small vessels and would not meet the statement of need submitted by BHL on behalf of the MCA.

##### **Option 1. Permanent Danger Area**

Of the presented options, this is the preferred solution from 2Excels' viewpoint. However, only option 1B gets close to meeting our operational requirements.

**Option 1A – DAAIS only**, the information service would tell us if the DA was notified as active, and there would be no live management of the airspace. This option effectively replicates the existing D098 TDA complex but in a permanent state. The existing TDA complex and no DACS or procedural ATC service to positively deconflict manned fixed-wing aircraft against UAS aircraft would result in 2Excel manned assets being unable to enter the TDA when it is notified as active. This has a significant operational impact when the cloud base is at, below or near the upper level of the danger area. In our view, the current measures in the internal deconfliction plan are not robust enough to provide the level of deconfliction that allows manned operations. This is in accordance with para 2.1.2 of CAP 722, which excludes manned aircraft from the designated airspace where UAS aircraft are operating. These circumstances would prevail should the TDA be made permanent with only the DAAIS provided, resulting in a significant operational impact and increasing the risk to life of persons on the water in the operational area. It is no better than the current TDA structure and limits the effectiveness of manned fixed-wing SAR operations in the channel.



**Option 1B – DAAIS and DACS.** This option gets close to meeting our requirements but isn't specific enough. The feedback offered for Option 1A is also relevant to this option. To allow manned fixed-wing aircraft to enter the DA once it has been notified as active, the DACS would need the capability to procedurally control both the UAS assets and manned assets tasked to support the airborne operation. A DACS without this capability would not be an improvement on the DAAIS. This is 2Excels' preferred solution.

If the following could be included as part of Option 1b, this would substantially enhance the viability of this option.

- TDA098 is subdivided into areas A – H. Areas A, C, F, and H are for the safe launch and recovery of the UAS, and areas E, D, B, and G are operational areas.
- We suggest that areas E, D, B, and G be further subdivided into smaller operational areas. These areas would only be active when the UAS is flying, and a designated airspace controller would manage the activation and deactivation of the airspace. This would allow access to the areas of the DA that were not active to manned fixed-wing SAR operations and potentially other airspace users. All operators would need to be diligent in using the airspace activating/deactivating as required by the operational need. The DACS provider would be aware of which areas are active and be able to provide this as a service to other users, thereby segregating the UAS operations from manned aircraft operations.
- Additionally, we strongly feel a procedural deconfliction service should be provided by an ATS to allow manned operations safely and legally within the danger areas. The safety case should be collaborative work between the UK CAA, the Tasking Agencies, UAS operators and manned operators, specifically approved by the UK Civil Aviation Authority. This is important due to the dynamic nature of the operation and the regular re-tasking and movement that occurs.

#### **Option 2 – Danger Area with crossing corridor.**

We struggle to see how an open corridor would continue to allow UAS operations. Our operational experience gained whilst supporting this task for the last 3-years has demonstrated that migrant crossings can occur across the entire existing TDA complex. An open corridor allowing transit of other air users would deny this airspace to UAS and create a choke point – ultimately, this increases MAC risk to those users and to the manned SAR assets (due to UAS being excluded) that would therefore be operating in this airspace. Our comments submitted for Option 1A are also relevant to this option.



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**From:** Airspace Change Proposal  
**Sent:** 21 December 2022 16:58  
**To:** [REDACTED]  
**Subject:** ACP-2021-088 - Stage 2

Dear Stakeholder,

We are writing to you today to let you know that we successfully passed the Stage 1 gateway for ACP-2021-088, consequently we have progressed to Stage 2 - Develop & Assess. The initial stage (Stage - 2A) involves the development of airspace options, which are tested with you, our stakeholders.

Consequently, several options have been developed, and we would like to preliminarily test these options with you to ensure that you are satisfied that the design options align with the design principles and that we as the change sponsor have understood and accounted for your concerns within the design options. These options are set out within the attached presentation and PDF.

We would welcome your feedback on each of the design options and have included a feedback form to aid this, though we are happy to receive feedback in any appropriate formats. Any feedback needs to be returned to us at [airspacechangeproposal@bhlgrou.com](mailto:airspacechangeproposal@bhlgrou.com) by the 30 January 2023.

Further details of the proposal can be found at [Airspace change portal \(caa.co.uk\)](https://www.caa.co.uk/airspace-change), then selecting 'search by Airspace Change ID' and entering ACP reference ACP-2021-088.

Guidance relating to the Airspace Change Proposal and the process we are required to follow by the CAA can be found at <https://airspacechange.caa.co.uk/about-airspace-change/> and specifically CAP1616.

If you no longer wish to be included in further communications regarding this ACP, please reply to this email with 'STOP' in the subject and you will be removed from the stakeholder list.

We look forward to your feedback and continued engagement in this process.

Kind Regards,

**Bristow Search & Rescue**  
Dyce Avenue  
Dyce, Aberdeen  
AB21 0LQ





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35467 - AEM Limited

Date	Summary of Engagement	Method	Remarks
21 Dec 22	Commencement of Stage 2 and initial design options for feedback (Annex C).	Email	
16 Jan 23	Reminder for feedback on initial airspace design options.	Email	



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87999 - Aero Legends

Date	Summary of Engagement	Method	Remarks
21 Dec 22	Commencement of Stage 2 and initial design options for feedback (Annex C).	Email	
16 Jan 23	Reminder for feedback on initial airspace design options.	Email	



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67463 - Air Search

Date	Summary of Engagement	Method	Remarks
21 Dec 22	Commencement of Stage 2 and initial design options for feedback (Annex C).	Email	
16 Jan 23	Reminder for feedback on initial airspace design options.	Email	



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14585 - Aircraft Owners and Pilots Association (AOPA)

Date	Summary of Engagement	Method	Remarks
21 Dec 22	Commencement of Stage 2 and initial design options for feedback (Annex C).	Email	
16 Jan 23	Reminder for feedback on initial airspace design options.	Email	





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40942 - Airfield Operators Group (AOG)

Date	Summary of Engagement	Method	Remarks
21 Dec 22	Commencement of Stage 2 and initial design options for feedback (Annex C).	Email	
16 Jan 23	Reminder for feedback on initial airspace design options.	Email	
16 Jan 23	Request to be removed from stakeholders list.	Email	

---

**From:** [REDACTED]  
**Sent:** 16 January 2023 19:31  
**To:** Airspace Change Proposal <airspacechangeproposal@bristowgroup.com>  
**Subject:** STOP

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

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Sent from my iPhone

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On 16 Jan 2023, at 14:54, Airspace Change Proposal <airspacechangeproposal@bristowgroup.com> wrote:

Dear Stakeholder,

We recently emailed to invite opinions on the initial airspace options of our airspace change proposal, and wanted to provide a reminder in case you or your organisation want to provide feedback. If you can send any feedback by the 30 January 23 to [airspacechangeproposal@bristowgroup.com](mailto:airspacechangeproposal@bristowgroup.com) we would be grateful.

In case you missed our previous email, we have appended it below with the details and the accompanying documents are attached.





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If you no longer wish to be included in further communications regarding this ACP, please reply to this email with 'STOP' in the subject and you will be removed from the stakeholder list.

Kind Regards,

### **Bristow Search & Rescue**

Dyce Avenue  
Dyce, Aberdeen  
AB21 0LQ



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

**Sent:** 21 December 2022 17:01

**To:** [REDACTED]

**Subject:** ACP-2021-088 - Stage 2

Dear Stakeholder,

We are writing to you today to let you know that we successfully passed the Stage 1 gateway for ACP-2021-088, consequently we have progressed to Stage 2 - Develop & Assess. The initial stage (Stage - 2A) involves the development of airspace options, which are tested with you, our stakeholders.

Consequently, several options have been developed, and we would like to preliminarily test these options with you to ensure that you are satisfied that the design options align with the design principles and that we as the change sponsor have understood and accounted for your concerns within the design options. These options are set out within the attached presentation and PDF.

We would welcome your feedback on each of the design options and have included a feedback form to aid this, though we are happy to receive feedback in any appropriate formats. Any feedback needs to be returned to us at [airspacechangeproposal@bhlgroup.com](mailto:airspacechangeproposal@bhlgroup.com) by the 30 January 2023.



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Further details of the proposal can be found at [Airspace change portal \(caa.co.uk\)](https://www.caa.co.uk/air-space-change-portal), then selecting 'search by Airspace Change ID' and entering ACP reference ACP-2021-088.

Guidance relating to the Airspace Change Proposal and the process we are required to follow by the CAA can be found at <https://airspacechange.caa.co.uk/about-airspace-change/> and specifically CAP1616.

If you no longer wish to be included in further communications regarding this ACP, please reply to this email with 'STOP' in the subject and you will be removed from the stakeholder list.

We look forward to your feedback and continued engagement in this process.

Kind Regards,

### **Bristow Search & Rescue**

Dyce Avenue  
Dyce, Aberdeen  
AB21 0LQ



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27633 - Airport Operators Association (AOA)

Date	Summary of Engagement	Method	Remarks
21 Dec 22	Commencement of Stage 2 and initial design options for feedback (Annex C).	Email	
16 Jan 23	Reminder for feedback on initial airspace design options.	Email	



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72792 - Airspace Change Organising Group (ACOG)

Date	Summary of Engagement	Method	Remarks
21 Dec 22	Commencement of Stage 2 and initial design options for feedback (Annex C).	Email	
16 Jan 23	Reminder for feedback on initial airspace design options.	Email	



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33717 - Airspace4All

Date	Summary of Engagement	Method	Remarks
21 Dec 22	Commencement of Stage 2 and initial design options for feedback (Annex C).	Email	
16 Jan 23	Reminder for feedback on initial airspace design options.	Email	



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16214 - Association of Remotely Piloted Aircraft Systems UK (ARPAS-UK)

Date	Summary of Engagement	Method	Remarks
21 Dec 22	Commencement of Stage 2 and initial design options for feedback (Annex C).	Email	
16 Jan 23	Reminder for feedback on initial airspace design options.	Email	
23 Jan 23	Feedback on initial airspace design options.	Email	
26 Jan 23	Thank you for feedback.	Email	

---

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

**Sent:** 26 January 2023 12:51

**To:** [REDACTED]

**Subject:** Re: ACP-2021-088 Stage 2

Good Afternoon [REDACTED],

Thank you for your feedback.

Best Regards,

[REDACTED]

---

**From:** [REDACTED]

**Sent:** 23 January 2023 20:44

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

**Subject:** ACP-2021-088 Stage 2

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

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Please find attached your ACP-2021-088 Stage 2 proposal, with the Feedback pages completed with our responses.

Kind regards





## Design Option 1A – Stakeholder Feedback

**We are looking for feedback and wish to understand how this option may impact you.**

Item	Question	Feedback
1	Do you agree with the initial assessment against the agreed Design Principles? If not please provide details?	Yes
2	How would this option impact you?	Not at all
3	Do you have any alternative airspace construct suggestions that will meet the statement of need and align with Design Principles?	No
4	Do you have any alternative airspace management suggestions that can be considered that will meet the statement of need and Design Principles?	No
5	Free Text	An acceptable alternative





## Design Option 1B – Stakeholder Feedback

**We are looking for feedback and wish to understand how this option may impact you.**

Item	Question	Feedback
1	Do you agree with the initial assessment against the agreed Design Principles? If not please provide details?	Yes
2	How would this option impact you?	Not at all
3	Do you have any alternative airspace construct suggestions that will meet the statement of need and align with Design Principles?	No
4	Do you have any alternative airspace management suggestions that can be considered that will meet the statement of need and Design Principles?	No
5	Free Text	An acceptable alternative



## Design Option 2 – Stakeholder Feedback

**We are looking for feedback and wish to understand how this option may impact you.**

Item	Question	Feedback
1	Do you agree with the initial assessment against the agreed Design Principles? If not please provide details?	Yes
2	How would this option impact you?	Not at all
3	Do you have any alternative airspace construct suggestions that will meet the statement of need and align with Design Principles?	No
4	Do you have any alternative airspace management suggestions that can be considered that will meet the statement of need and Design Principles?	No
5	Free Text	An acceptable alternative



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Twitter: @ARPASUK  
LinkedIn: ARPAS-UK  
██████████



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

**Sent:** 18 October 2022 15:05

**To:** [REDACTED]

**Subject:** ACP-2021-088 - Design Principles Engagement

Dear Valued Stakeholder,

We recently emailed to invite opinions on the design principles of our airspace change proposal, and wanted to provide a reminder in case you or your organisation want to provide feedback. The engagement is open until the 3 Nov 22, and we would welcome any feedback you might have.

In case you missed our previous email, we have appended it below with the details and the accompanying documents are attached.

Kind Regards,

### **Bristow Search & Rescue**

Dyce Avenue  
Dyce, Aberdeen  
AB21 0LQ



*Global Leader in Vertical Flight*

-

**Subject:** ACP-2021-088 - Design Principles Engagement

Dear Valued Stakeholder,



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Coastguard  
Agency



Bristow Helicopters Ltd and the Maritime and Coastguard Agency previously contacted a range of stakeholders to invite opinions on the design principles of our airspace change proposal. Following previous feedback and discussions with the Civil Aviation Authority (CAA), we are repeating Stage 1B of the Airspace Change Process. We are therefore contacting you at this early stage (1b) to invite opinions on the design principles that will shape the airspace going forwards, and have prepared a revised document that explains the airspace change proposal and why we believe it is necessary.

We have opened the engagement today on 22 Sept 22 and it will close for this stage on 3 Nov 22, this will allow time for us to prepare and submit the design principles to the CAA for review. Enclosed are both a PDF and Word feedback template specific to the design principles, which can be returned to us via email at [airspacechangeproposal@bristowgroup.com](mailto:airspacechangeproposal@bristowgroup.com), along with any other comments you may have.

Further details of the proposal can be found at [Airspace change portal \(caa.co.uk\)](https://airspacechangeportal.caa.co.uk), then selecting 'search by Airspace Change ID' and entering ACP reference ACP-2021-088.

Guidance relating to the Airspace Change Proposal and the process we are required to follow by the CAA can be found at <https://airspacechange.caa.co.uk/about-airspace-change/> and specifically CAP1616.

We look forward to your feedback and continued engagement in this process.

Kind Regards,

### **Bristow Search & Rescue**

Dyce Avenue  
Dyce, Aberdeen  
AB21 0LQ



*Global Leader in Vertical Flight*

---

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

**Sent:** 21 December 2022 17:02

**To:** [REDACTED]

**Subject:** ACP-2021-088 - Stage 2





Maritime &  
Coastguard  
Agency



Dear Stakeholder,

We are writing to you today to let you know that we successfully passed the Stage 1 gateway for ACP-2021-088, consequently we have progressed to Stage 2 - Develop & Assess. The initial stage (Stage - 2A) involves the development of airspace options, which are tested with you, our stakeholders.

Consequently, several options have been developed, and we would like to preliminarily test these options with you to ensure that you are satisfied that the design options align with the design principles and that we as the change sponsor have understood and accounted for your concerns within the design options. These options are set out within the attached presentation and PDF.

We would welcome your feedback on each of the design options and have included a feedback form to aid this, though we are happy to receive feedback in any appropriate formats. Any feedback needs to be returned to us at [airspacechangeproposal@bhlgroup.com](mailto:airspacechangeproposal@bhlgroup.com) by the 30 January 2023.

Further details of the proposal can be found at [Airspace change portal \(caa.co.uk\)](https://airspacechangeportal.caa.co.uk), then selecting 'search by Airspace Change ID' and entering ACP reference ACP-2021-088.

Guidance relating to the Airspace Change Proposal and the process we are required to follow by the CAA can be found at <https://airspacechange.caa.co.uk/about-airspace-change/> and specifically CAP1616.

If you no longer wish to be included in further communications regarding this ACP, please reply to this email with 'STOP' in the subject and you will be removed from the stakeholder list.

We look forward to your feedback and continued engagement in this process.

Kind Regards,

**Bristow Search & Rescue**

Dyce Avenue  
Dyce, Aberdeen  
AB21 0LQ



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34444 - Atlantic Bridge Aviation Ltd

Date	Summary of Engagement	Method	Remarks
21 Dec 22	Commencement of Stage 2 and initial design options for feedback (Annex C).	Email	
16 Jan 23	Reminder for feedback on initial airspace design options.	Email	



Maritime &  
Coastguard  
Agency



09583 - Av Man Engineering Ltd

Date	Summary of Engagement	Method	Remarks
21 Dec 22	Commencement of Stage 2 and initial design options for feedback (Annex C).	Email	
16 Jan 23	Reminder for feedback on initial airspace design options.	Email	





Maritime &  
Coastguard  
Agency



24830 - Aviation Environment Federation (AEF)

Date	Summary of Engagement	Method	Remarks
21 Dec 22	Commencement of Stage 2 and initial design options for feedback (Annex C).	Email	
16 Jan 23	Reminder for feedback on initial airspace design options.	Email	



Maritime &  
Coastguard  
Agency



66847 - BAe Systems

Date	Summary of Engagement	Method	Remarks
21 Dec 22	Commencement of Stage 2 and initial design options for feedback (Annex C).	Email	
16 Jan 23	Reminder for feedback on initial airspace design options.	Email	



Maritime &  
Coastguard  
Agency



69630 - Barnham's Mill Farm / Egerton Airstrip (Kent Microlight Club)

Date	Summary of Engagement	Method	Remarks
21 Dec 22	Commencement of Stage 2 and initial design options for feedback (Annex C).	Email	
16 Jan 23	Reminder for feedback on initial airspace design options.	Email	



68979 - BCAA - Belgium Civil Aviation Authority

Date	Summary of Engagement	Method	Remarks
21 Dec 22	Commencement of Stage 2 and initial design options for feedback (Annex C).	Email	
21 Dec 22	Automated Response	Email	
13 Jan 23	Resent commencement of Stage 2 and initial design options for feedback (Annex D), following new POC received from the CAA.	Email	
15 Jan 23	Email redirecting to appropriate person within Belgium CAA	Email	
16 Jan 23	Introduction from UK CAA	Email	
16 Jan 23	Resent commencement of Stage 2 and initial design options for feedback to new POC.	Email	
16 Jan 23	Automated Response	Email	
3 Feb 23	Feedback on initial airspace options.	Email	
3 Feb 23	Thank you for feedback.	Email	

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

**Sent:** 03 February 2023 08:44

**To:** [REDACTED]

**Subject:** Re: UK ACP-2021-088 - Stage 2

[REDACTED]

Thank you for your feedback it is much appreciated, we will take it forward in discussions as we progress.



Maritime &  
Coastguard  
Agency



Kind Regards,

[REDACTED]

---

**From:** [REDACTED]

**Sent:** 03 February 2023 07:50

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

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

**Subject:** FW: UK ACP-2021-088 - Stage 2

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

Dear Sirs,

Dear [REDACTED],

Dear [REDACTED],

I would like to thank you for giving us the opportunity to provide our comments and concerns on this UK ACP. As the file was protected, I could not insert the comments and concerns I received from the involved Belgian civilian and military stakeholders. Their comments and concerns are summarized as follows:

**MUAC:**

- *Not involved*

**Defense:**

- *Option 1b would provide the highest level of safety.*
- *The UK CAA must ensure that cross-FIR border SAR operations remain possible for foreign A/C, including BEL SAR helicopters operating in the UK FIR. If they cannot ensure this requirement then BEL will have serious issues providing support to the UK when their SAR means are not available.*
- *It could also have an impact on NH90 MAR Ops when they want to operate from the deck of a navigating ship.  
It's a bit more plannable than SAR but could nevertheless be required at very short notice. UK and FRA MOD will likely suffer the same kind of problems.*

**Skeyes:**





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Agency



*The impact seems rather limited for skeyes. The tangent between its controlled airspace and this Danger Area is minimal and only flights at or below 2500 feet are impacted.  
Skeyes could be notified by the British of the activation, of the Danger Area, so that it can pass this info on to cross channel flights at that altitude.*

Kind regards,  
[Redacted]



[Redacted]  
Head of Airspace Department  
[Redacted]  
[Redacted]  
[Redacted]



---

**From:** [Redacted]  
**Sent:** 16 January 2023 11:01  
**To:** Airspace Change Proposal <airspacechangeproposal@bristowgroup.com>  
**Subject:** Automatisch antwoord: [External] RE: UK ACP-2021-088 - Stage 2

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

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**From:** Airspace Change Proposal <airspacechangeproposal@bristowgroup.com>  
**Sent:** 16 January 2023 10:58  
**To:** [Redacted]  
**Cc:** Airspace Change Proposal <airspacechangeproposal@bristowgroup.com>  
**Subject:** Re: [External] RE: UK ACP-2021-088 - Stage 2

[Redacted]





Maritime &  
Coastguard  
Agency



Thank you for the introductions and context,

██████████,

As you will see from the email chain we are currently working through and airspace change proposal on behalf of the UK Maritime and Coastguard Agency.

I have included a couple of key documents to help inform you of the ACP, all of which can be found at [Airspace change portal \(caa.co.uk\)](https://caa.co.uk), then selecting 'search by Airspace Change ID' and entering ACP reference ACP-2021-088.

- Statement of Need
- Stage 1 Engagement Letter (for context)
- Stage 2A - Airspace Options

Having now progressed to Stage 2A we have developed some initial options that we would like to preliminarily test with you. This is to ensure that you are satisfied that the design options align with the design principles and that we as the change sponsor have understood and accounted for your concerns within the design options. These options are set out within Stage 2A - Airspace Options.

We would welcome your feedback on each of the design options and have included a feedback form to aid this, though we are happy to receive feedback in any appropriate formats. Any feedback needs to be returned to us at [airspacechangeproposal@bristowgroup.com](mailto:airspacechangeproposal@bristowgroup.com) by the 30 January 2023.

If you have any questions please don't hesitate to get in touch.

Best Regards,

---

From: ██████████

Sent: 16 January 2023 07:57

To: ██████████

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

Subject: RE: [External] RE: UK ACP-2021-088 - Stage 2



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

[REDACTED],  
Many thanks for redirecting this enquiry.

[REDACTED], you may already be aware that the UK is utilising low altitude Danger Areas in the English Channel to enable BVLOS operations in response to the migrant small boat situation. These were introduced as a temporary measure some time ago (not published in the main UK AIP) but have since been extended in their duration due to the ongoing importance of the task. There is now a need to establish a permanent airspace solution. Because there was limited analysis of the impact from these areas conducted at the time, our processes require more thorough work to be undertaken to enable permanent structures to take their place. If you are okay for now I will let the sponsor of the change (currently Bristow helicopters) contact you to conduct their initial engagement. I will, of course, be happy to provide CAA support as necessary.

Regards,

[REDACTED]  
[REDACTED]  
[REDACTED]  
Civil Aviation Authority

Tel: [REDACTED]

Follow us on Twitter: [@UK\\_CAA](https://twitter.com/UK_CAA)



Please consider the environment. Think before printing this email.

**From:** [REDACTED]  
**Sent:** 15 January 2023 10:12  
**To:** Airspace Change Proposal <airspacechangeproposal@bristowgroup.com>; [REDACTED]  
[REDACTED]







Maritime &  
Coastguard  
Agency



[REDACTED]  
[REDACTED]  
**Subject:** [External] RE: UK ACP-2021-088 - Stage 2

Dear [REDACTED],

Sorry for this reply.

I should have reacted earlier to [REDACTED] e-mail since I am not the responsible person at BCAA to coordinate this ACP. I forwarded your request to Théo Nsengimana (see e-mail under Cc) who will address the correct contact point.

Kind regards,  
[REDACTED]

---

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

**Sent:** 13 January 2023 14:24

**To:** [REDACTED]

**Subject:** UK ACP-2021-088 - Stage 2

Dear Jean-Marie,

We were provided your details by [REDACTED] at the UK CAA, to engage with regarding an airspace change proposal in the Chanel. We are therefore writing to you today to let you know that we successfully passed the Stage 1 gateway for ACP-2021-088, consequently we have progressed to Stage 2 - Develop & Assess. The initial stage (Stage - 2A) involves the development of airspace options, which are tested with you, our stakeholders.

Consequently, several options have been developed, and we would like to preliminarily test these options with you to ensure that you are satisfied that the design options align with the design principles and that we as the change sponsor have understood and accounted for your concerns within the design options. These options are set out within the attached presentation and PDF.

We would welcome your feedback on each of the design options and have included a feedback form to aid this, though we are happy to receive feedback in any appropriate formats. Any feedback needs to be returned to us at [airspacechangeproposal@bristowgroup.com](mailto:airspacechangeproposal@bristowgroup.com) by the 30 January 2023.

Further details of the proposal can be found at [Airspace change portal \(caa.co.uk\)](https://caa.co.uk), then selecting 'search by Airspace Change ID' and entering ACP reference ACP-2021-088.



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Coastguard  
Agency



Guidance relating to the Airspace Change Proposal and the process we are required to follow by the CAA can be found at <https://airspacechange.caa.co.uk/about-airspace-change/> and specifically CAP1616.

If you no longer wish to be included in further communications regarding this ACP, please reply to this email with 'STOP' in the subject and you will be removed from the stakeholder list.

We look forward to your feedback and continued engagement in this process.

Kind Regards,



**Bristow Search & Rescue**  
Dyce Avenue  
Dyce, Aberdeen  
AB21 0LQ



*Global Leader in Vertical Flight*

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**From:** [Redacted]  
**Sent:** 21 December 2022 17:09  
**To:** Airspace Change Proposal <airspacechangeproposal@bristowgroup.com>  
**Subject:** Ontvangstbevestiging [Ticket=INFO:354099]

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Mevrouw, Mijnheer,

We hebben uw e-mail goed ontvangen en hebben deze doorgestuurd naar de bevoegde dienst, die u zo snel mogelijk zal antwoorden.





Maritime &  
Coastguard  
Agency



**OPGELET:** vragen met betrekking tot de **DIV dienst** moeten naar [help.div@mobiliteit.fgov.be](mailto:help.div@mobiliteit.fgov.be) gestuurd worden. Deze worden niet doorgestuurd vanuit [info@mobiliteit.fgov.be](mailto:info@mobiliteit.fgov.be) naar [help.div@mobiliteit.fgov.be](mailto:help.div@mobiliteit.fgov.be).

De DIV dienst houdt zich bezig met de inschrijvingen (auto's, motorfietsen, elektrische fietsen, tractoren, CD -platen, ...), terugbetalingen ten gevolge een door de DIV gemaakte fout, aanvragen van duplicaten. Vragen met betrekking tot de persoplaten moeten naar [perso.div@mobiliteit.fgov.be](mailto:perso.div@mobiliteit.fgov.be) gestuurd worden.

Vragen ivm technische controle, dient u te richten tot de gewesten ([www.mobielvlaanderen.be/contactpunt](http://www.mobielvlaanderen.be/contactpunt) , <http://www.wallonie.be>, <http://be.brussels/>)

Vragen ivm wegentaks, vallen eveneens onder de gewestelijke bevoegdheid (<https://belastingen.vlaanderen.be/verkeersbelastingen> - <http://www.wallonie.be/fr/competences/fiscalite> - <https://fiscalite.brussels/fr/page-d-accueil/competences>)

Met vriendelijke groeten,

De infobalie  
FOD Mobiliteit en Vervoer  
<http://www.mobiliteit.belgium.be/>

-----  
Madame, Monsieur,

Nous avons bien reçu votre courriel et nous l'avons transmis au service compétent, qui vous répondra dans les plus brefs délais.

**ATTENTION:** les demandes d'information concernant **le service DIV** doivent être envoyées à [help.div@mobiliteit.fgov.be](mailto:help.div@mobiliteit.fgov.be); elles ne seront pas transférées à partir de [info@mobiliteit.fgov.be](mailto:info@mobiliteit.fgov.be) vers [help.div@mobiliteit.fgov.be](mailto:help.div@mobiliteit.fgov.be).

Le service DIV s'occupe des immatriculations (voitures, motos, taxis, vélos électriques tracteurs, plaques CD, ...), des remboursements suite à erreur due à la DIV, des duplicata. Les demandes relatives aux plaques personnalisées doivent être adressées à [perso.div@mobiliteit.fgov.be](mailto:perso.div@mobiliteit.fgov.be)

Les demandes concernant le contrôle technique, vous devez envoyer aux régions ([www.mobielvlaanderen.be/contactpunt](http://www.mobielvlaanderen.be/contactpunt) , <http://www.wallonie.be>, <http://be.brussels/>)

Les demandes concernant la taxe auto, vous devez envoyer aux régions ( <https://belastingen.vlaanderen.be/verkeersbelastingen> -

<http://www.wallonie.be/fr/competences/fiscalite> - <https://fiscalite.brussels/fr/page-d-accueil/competences>)



Maritime &  
Coastguard  
Agency



Nous vous prions de croire, Madame, Monsieur, à nos sentiments les meilleurs.

Le guichet d'information  
SPF Mobilité et Transports  
<http://www.mobilit.belgium.be/>

[Disclaimer](#)

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Maritime &  
Coastguard  
Agency



31348 - Biggin Hill Airport

Date	Summary of Engagement	Method	Remarks
21 Dec 22	Commencement of Stage 2 and initial design options for feedback (Annex C).	Email	
16 Jan 23	Reminder for feedback on initial airspace design options.	Email	



Maritime &  
Coastguard  
Agency



70609 - Blackbushe Airfield

Date	Summary of Engagement	Method	Remarks
21 Dec 22	Commencement of Stage 2 and initial design options for feedback (Annex C).	Email	
16 Jan 23	Reminder for feedback on initial airspace design options.	Email	



Maritime &  
Coastguard  
Agency



67464 - Bonnington Airfield

Date	Summary of Engagement	Method	Remarks
21 Dec 22	Commencement of Stage 2 and initial design options for feedback (Annex C).	Email	
16 Jan 23	Reminder for feedback on initial airspace design options.	Email	



Maritime &  
Coastguard  
Agency



70738 - Bristow Helicopters Limited

Date	Summary of Engagement	Method	Remarks
22 Dec 22	Commencement of Stage 2 and initial design options for feedback (Annex C).	Email	
20 Jan 23	Feedback on initial airspace change proposal.	Email	

**From:** [REDACTED]  
**Sent:** 20 January 2023 22:29  
**To:** [REDACTED]; Airspace Change Proposal  
 <airspacechangeproposal@bristowgroup.com>  
**Subject:** Fwd: ACP 2021-088 - Stage 2

[REDACTED]  
[REDACTED]

[REDACTED]  
 Dyce Avenue  
 Dyce, Aberdeen  
 AB21 0LQ  
 [REDACTED]  
 [REDACTED]  
 [REDACTED]

Confidence in flight. Worldwide.

**From:** [REDACTED]  
**Sent:** Friday, January 20, 2023 8:16 pm  
**To:** [REDACTED]  
**Subject:** ACP 2021-088 - Stage 2

Good afternoon,

Thank you for the invitation to consider the views and impact on UK SAR based in Lydd, on ACP 2021-088, to support UAS operations in the Channel.

I have included our feedback for each option below:







**Option 0 - Baseline**

No feedback required, understanding that this will predicate UAS activity, due to not meeting CAA regulatory requirements.

**Option 1A - Class G Airspace with Permanent Danger Area**

Item	Question	Feedback
1	Do you agree with the initial assessment against the agreed Design Principles? If not please provide details?	Yes
2	How would this option impact you?	Little to no impact if current emergency protocols for SAR helicopters to enter existing Danger Area Temporary Danger Area are transitioned to a Permanent Danger Area.
3	Do you have any alternative airspace construct suggestions that will meet the statement of need and align with Design Principles?	No
4	Do you have any alternative airspace management suggestions that can be considered that will meet the statement of need and Design Principles?	No
5	Free Text	Nil

**Option 1B - Class G with Permanent Danger Area with DACS & DAAIS**

Item	Question	Feedback
1	Do you agree with the initial assessment against the agreed Design	Yes



	Principles? If not please provide details?	
2	How would this option impact you?	Little to no impact if current emergency protocols for SAR helicopters to enter existing Danger Area Temporary Danger Area are transitioned to a Permanent Danger Area.
3	Do you have any alternative airspace construct suggestions that will meet the statement of need and align with Design Principles?	No
4	Do you have any alternative airspace management suggestions that can be considered that will meet the statement of need and Design Principles?	No
5	Free Text	Nil

#### Option 2 - Permanent Danger Area with access corridors

Item	Question	Feedback
1	Do you agree with the initial assessment against the agreed Design Principles? If not please provide details?	Yes
2	How would this option impact you?	Little to no impact if current emergency protocols for SAR helicopters to enter existing Danger Area Temporary Danger Area are transitioned to a Permanent Danger Area. However, if other air traffic are crossing DA through corridors, adds an additional level of complexity, in emergency situations.
3	Do you have any alternative airspace construct suggestions that will meet the statement of need and align with Design Principles?	No



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Coastguard  
Agency



4	Do you have any alternative airspace management suggestions that can be considered that will meet the statement of need and Design Principles?	No
5	Free Text	Nil

Many thanks,

[Redacted]

[Redacted]

Bristow Search and Rescue  
Lydd Airport  
Romney Marsh  
Kent  
TN29 9QL

[Redacted]

[Redacted]

[Redacted]



Maritime &  
Coastguard  
Agency



44221 - British Airline Pilots Association (BALPA)

Date	Summary of Engagement	Method	Remarks
21 Dec 22	Commencement of Stage 2 and initial design options for feedback (Annex C).	Email	
16 Jan 23	Reminder for feedback on initial airspace design options.	Email	



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Coastguard  
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68705 - British Airways (BA)

Date	Summary of Engagement	Method	Remarks
21 Dec 22	Commencement of Stage 2 and initial design options for feedback (Annex C).	Email	
16 Jan 23	Reminder for feedback on initial airspace design options.	Email	



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52556 - British Balloon and Airship Club

Date	Summary of Engagement	Method	Remarks
21 Dec 22	Commencement of Stage 2 and initial design options for feedback (Annex C).	Email	
16 Jan 23	Reminder for feedback on initial airspace design options.	Email	



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Coastguard  
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80206 - British Business and General Aviation Association (BBGA)

Date	Summary of Engagement	Method	Remarks
21 Dec 22	Commencement of Stage 2 and initial design options for feedback (Annex C).	Email	
16 Jan 23	Reminder for feedback on initial airspace design options.	Email	
16 Jan 23	Automated response.	Email	

**From:** [REDACTED]  
**Sent:** 16 January 2023 15:12  
**To:** Airspace Change Proposal <airspacechangeproposal@bristowgroup.com>  
**Subject:** Automatic reply: ACP-2021-088 - Stage 2

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

**Hi and thanks for your message.**

**Please contact [REDACTED] if you have any urgent requests.**

**Best Regards,**

[REDACTED]

This email (including any attachments) is intended for the use of the intended recipient(s) only. Any unauthorised use or dissemination of this communication is strictly prohibited. If you have received this communication in error, please immediately notify the sender by return e-mail message and delete all copies of the original communication. Thank you for your cooperation. (BBGA Association Limited : company number 01209831)



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Coastguard  
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89283 - British Gliding Association (BGA)

Date	Summary of Engagement	Method	Remarks
21 Dec 22	Commencement of Stage 2 and initial design options for feedback (Annex C).	Email	
16 Jan 23	Reminder for feedback on initial airspace design options.	Email	





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Coastguard  
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15601 - British Hang Gliding and Paragliding Association (BHPA)

Date	Summary of Engagement	Method	Remarks
21 Dec 22	Commencement of Stage 2 and initial design options for feedback (Annex C).	Email	
16 Jan 23	Reminder for feedback on initial airspace design options.	Email	



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Coastguard  
Agency



03548 - British Helicopter Association (BHA)

Date	Summary of Engagement	Method	Remarks
21 Dec 22	Commencement of Stage 2 and initial design options for feedback (Annex C).	Email	
16 Jan 23	Reminder for feedback on initial airspace design options.	Email	



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Coastguard  
Agency



25256 - British Microlight Aircraft Association (BMAA)

Date	Summary of Engagement	Method	Remarks
21 Dec 22	Commencement of Stage 2 and initial design options for feedback (Annex C).	Email	
16 Jan 23	Reminder for feedback on initial airspace design options.	Email	



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Coastguard  
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30521 - British Model Flying Association (BMFA)

Date	Summary of Engagement	Method	Remarks
21 Dec 22	Commencement of Stage 2 and initial design options for feedback (Annex C).	Email	
16 Jan 23	Reminder for feedback on initial airspace design options.	Email	



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44450 - British Skydiving

Date	Summary of Engagement	Method	Remarks
21 Dec 22	Commencement of Stage 2 and initial design options for feedback (Annex C).	Email	
16 Jan 23	Reminder for feedback on initial airspace design options.	Email	



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28745 - Challock Airfield

Date	Summary of Engagement	Method	Remarks
21 Dec 22	Commencement of Stage 2 and initial design options for feedback (Annex C).	Email	
16 Jan 23	Reminder for feedback on initial airspace design options.	Email	



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73525 - Channel Gliding Club

Date	Summary of Engagement	Method	Remarks
21 Dec 22	Commencement of Stage 2 and initial design options for feedback (Annex C).	Email	
16 Jan 23	Reminder for feedback on initial airspace design options.	Email	



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78175 - Chichester/Goodwood Aerodrome

Date	Summary of Engagement	Method	Remarks
21 Dec 22	Commencement of Stage 2 and initial design options for feedback (Annex C).	Email	
16 Jan 23	Reminder for feedback on initial airspace design options.	Email	





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Agency



67462 - Clipgate Airfield

Date	Summary of Engagement	Method	Remarks
21 Dec 22	Commencement of Stage 2 and initial design options for feedback (Annex C).	Email	
16 Jan 23	Reminder for feedback on initial airspace design options.	Email	



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Coastguard  
Agency



67342 - [REDACTED]

Date	Summary of Engagement	Method	Remarks
21 Dec 22	Commencement of Stage 2 and initial design options for feedback (Annex C).	Email	
16 Jan 23	Reminder for feedback on initial airspace design options.	Email	



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Agency



46571 - Coldharbour Farm Airfield (Kent Microlight Club)

Date	Summary of Engagement	Method	Remarks
21 Dec 22	Commencement of Stage 2 and initial design options for feedback (Annex C).	Email	
16 Jan 23	Reminder for feedback on initial airspace design options.	Email	



Maritime &  
Coastguard  
Agency



09090 - Cristal Air

Date	Summary of Engagement	Method	Remarks
21 Dec 22	Commencement of Stage 2 and initial design options for feedback (Annex C).	Email	
16 Jan 23	Reminder for feedback on initial airspace design options.	Email	



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39257 - Deanland Airfield

Date	Summary of Engagement	Method	Remarks
21 Dec 22	Commencement of Stage 2 and initial design options for feedback (Annex C).	Email	
16 Jan 23	Reminder for feedback on initial airspace design options.	Email	



64565 - DGAC - Directorate General for Civil Aviation

Date	Summary of Engagement	Method	Remarks
13 Jan 23	Commencement of Stage 2 and initial design options for feedback (Annex C).	Email	
19 Jan 23	Response with additional interested parties within Directorate General for Civil Aviation.	Email	
20 Jan 23	Email with initial airspace options requesting feedback.	Email	

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

**Sent:** 20 January 2023 10:44

**To:** [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

**Subject:** Re: UK ACP-2021-088 - Stage 2

Good Morning [REDACTED],

Thank you for sharing the POCs, and will keep you on copy.

Dear All,

For your ease please find attached the initial airspace options we have developed as part of UK ACP-2021-088, to support UAS / RPAS operations within the Chanel.

The details of the ACP can be found at [Airspace change portal \(caa.co.uk\)](https://caa.co.uk), then selecting 'search by Airspace Change ID' and entering ACP reference ACP-2021-088.



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Any feedback you might have would be gratefully recieved.

Best Regards,

[Redacted]

**Bristow Search & Rescue**

Dyce Avenue  
Dyce, Aberdeen  
AB21 0LQ



*Global Leader in Vertical Flight*

---

**From:** [Redacted]  
**Sent:** 19 January 2023 17:32  
**To:** Airspace Change Proposal <airspacechangeproposal@bristowgroup.com>  
**Cc:** [Redacted]  
 [Redacted]  
 [Redacted]  
**Subject:** RE: UK ACP-2021-088 - Stage 2

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

Dear [Redacted],

Regarding this BVLOS mission (UK ACP 2021 088), and even if there is no direct impact on French airspace (beside the corridors for the option 2) the following persons are the PoC in France :

ANS Lille : [Redacted]

Air Transport Directorate (DTA – French regulator) : [Redacted]

Regional Airspace Management Coordination for the North and West part of France : [Redacted]

[Redacted]  
 [Redacted]





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For your information, we will have BVLOS operations in the Channel from March 30<sup>th</sup> to October 27<sup>th</sup>. An AIP SUP will be published.

(The AIP SUP project in French attached to this email, last AIP SUP published on UK side was AIC Y 085/2022)

I will really appreciate if you will keep me on copy of your different exchanges.

Best regards,

--

[REDACTED]  
[REDACTED]  
*Espace – procédures de vol aux instruments – Intégration de la réglementation – Information aéronautique*  
DSNA : Direction des Opérations – Domaine Espace

[REDACTED]  
*Airspace design & management – Flight procedure design – Regulation integration – Aeronautical information*  
DSNA : OPS Directorate – Airspace Domain

[REDACTED]  
[REDACTED]  
[REDACTED]  
[www.ecologie.gouv.fr](http://www.ecologie.gouv.fr)



---

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

**Sent:** 13 January 2023 14:26

**To:** [REDACTED]

**Subject:** UK ACP-2021-088 - Stage 2

Dear [REDACTED],

We were provided your details by [REDACTED] at the UK CAA, to engage with regarding an airspace change proposal in the Chanel. We are therefore writing to you today to let you know that we successfully passed the Stage 1 gateway for ACP-2021-088, consequently we have progressed to Stage 2 - Develop & Assess. The initial stage (Stage - 2A) involves the development of airspace options, which are tested with you, our stakeholders.

Consequently, several options have been developed, and we would like to preliminarily test these options with you to ensure that you are satisfied that the design options align with the design principles and that we as the change sponsor have understood and accounted for your concerns within the design options. These options are set out within the attached presentation and PDF.







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We would welcome your feedback on each of the design options and have included a feedback form to aid this, though we are happy to receive feedback in any appropriate formats. Any feedback needs to be returned to us at [airspacechangeproposal@bristowgroup.com](mailto:airspacechangeproposal@bristowgroup.com) by the 30 January 2023.

Further details of the proposal can be found at [Airspace change portal \(caa.co.uk\)](https://airspacechangeportal.caa.co.uk), then selecting 'search by Airspace Change ID' and entering ACP reference ACP-2021-088.

Guidance relating to the Airspace Change Proposal and the process we are required to follow by the CAA can be found at <https://airspacechange.caa.co.uk/about-airspace-change/> and specifically CAP1616.

If you no longer wish to be included in further communications regarding this ACP, please reply to this email with 'STOP' in the subject and you will be removed from the stakeholder list.

We look forward to your feedback and continued engagement in this process.

Kind Regards,



**Bristow Search & Rescue**

Dyce Avenue  
Dyce, Aberdeen  
AB21 0LQ



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88898 - Dover and Folkestone Hang Gliding Club

Date	Summary of Engagement	Method	Remarks
21 Dec 22	Commencement of Stage 2 and initial design options for feedback (Annex C).	Email	
16 Jan 23	Reminder for feedback on initial airspace design options.	Email	
31 Jan 22	Feedback on initial airspace options.	Email	
1 Feb 23	Thank you for feedback.	Email	

---

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

**Sent:** 01 February 2023 09:41

**To:** [REDACTED]

**Subject:** Re: Airspace Change Proposal

Good Morning [REDACTED],

Thank you for the feedback.

Best Regards,

[REDACTED]

---

**From:** [REDACTED]

**Sent:** 31 January 2023 10:08

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

**Subject:** Airspace Change Proposal

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

Dear Sir / Madam





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Thank you for recent Email, inviting feedback from stakeholders on your slide presentation regarding UAS operations and airspace change proposals around the Kent Coast.

The Dover and Folkestone Hang Gliding Club, established in the early 19070's, is a small local leisure aviation club with approximately 135 members. For clarity, almost all of our pilots fly unpowered paragliders rather than hang gliders.

We have a particularly popular launch site at Capel Le Ferne and it is with this site in mind that we offer the feedback contained herein.

Whilst the greater part of these proposals would seem to have limited impact on our club's activity in the area, we have considered the proposals and can offer the following observations.

Slides 31 & 312

Both the Danger Activation Information Service and the Danger Crossing Service seem to offer sensible safety information to our pilots.

The nature of our foot launched aircraft and the absence of any reliable thermal activity at this site, means that we are almost always flying along the cliffs between Folkestone and Dover and rarely venture more than 100m horizontally away from the land. Altitude on this site is limited by local factors and it is extremely rare for our pilots to reach 1000 AMSL

Slide 45

As explained above, our pilots will never venture too far away from the cliffs, as this is where the lift is, so the crossing corridor is something that has no impact our sport.

We believe that the Design Criteria has been met.

Please do not hesitate to contact me should you feel it necessary.

Regards

[Redacted signature]

Sent from my Galaxy



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**From:** Airspace Change Proposal <airspacechangeproposal@bristowgroup.com>  
**Sent:** 16 January 2023 15:20  
**To:** [REDACTED]  
**Subject:** Re: ACP-2021-088 - Stage 2

Dear Stakeholder,

We recently emailed to invite opinions on the initial airspace options of our airspace change proposal, and wanted to provide a reminder in case you or your organisation want to provide feedback. If you can send any feedback by the 30 January 23 to [airspacechangeproposal@bristowgroup.com](mailto:airspacechangeproposal@bristowgroup.com) we would be grateful.

In case you missed our previous email, we have appended it below with the details and the accompanying documents are attached.

If you no longer wish to be included in further communications regarding this ACP, please reply to this email with 'STOP' in the subject and you will be removed from the stakeholder list.

Kind Regards,

### **Bristow Search & Rescue**

Dyce Avenue  
Dyce, Aberdeen  
AB21 0LQ



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**From:** Airspace Change Proposal <airspacechangeproposal@bristowgroup.com>  
**Sent:** 21 December 2022 17:17  
**To:** [REDACTED]  
**Subject:** ACP-2021-088 - Stage 2

Dear Stakeholder,

We are writing to you today to let you know that we successfully passed the Stage 1 gateway for ACP-2021-088, consequently we have progressed to Stage 2 - Develop & Assess. The initial stage (Stage - 2A) involves the development of airspace options, which are tested with you, our stakeholders.

Consequently, several options have been developed, and we would like to preliminarily test these options with you to ensure that you are satisfied that the design options align with the design principles and that we as the change sponsor have understood and accounted for your concerns within the design options. These options are set out within the attached presentation and PDF.

We would welcome your feedback on each of the design options and have included a feedback form to aid this, though we are happy to receive feedback in any appropriate formats. Any feedback needs to be returned to us at [airspacechangeproposal@bhlgroupp.com](mailto:airspacechangeproposal@bhlgroupp.com) by the 30 January 2023.

Further details of the proposal can be found at [Airspace change portal \(caa.co.uk\)](https://airspacechangeportal.caa.co.uk), then selecting 'search by Airspace Change ID' and entering ACP reference ACP-2021-088.

Guidance relating to the Airspace Change Proposal and the process we are required to follow by the CAA can be found at <https://airspacechange.caa.co.uk/about-airspace-change/> and specifically CAP1616.

If you no longer wish to be included in further communications regarding this ACP, please reply to this email with 'STOP' in the subject and you will be removed from the stakeholder list.

We look forward to your feedback and continued engagement in this process.

Kind Regards,

**Bristow Search & Rescue**  
Dyce Avenue  
Dyce, Aberdeen  
AB21 0LQ





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81860 - Drone Major

Date	Summary of Engagement	Method	Remarks
21 Dec 22	Commencement of Stage 2 and initial design options for feedback (Annex C).	Email	
16 Jan 23	Reminder for feedback on initial airspace design options.	Email	



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89916 - Dungeness Power Station

Date	Summary of Engagement	Method	Remarks
21 Dec 22	Commencement of Stage 2 and initial design options for feedback (Annex C).	Email	
16 Jan 23	Reminder for feedback on initial airspace design options.	Email	





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98078 - Eagle Aero Maintenance

Date	Summary of Engagement	Method	Remarks
21 Dec 22	Commencement of Stage 2 and initial design options for feedback (Annex C).	Email	
16 Jan 23	Reminder for feedback on initial airspace design options.	Email	



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09876 - Eastchurch Airfield

Date	Summary of Engagement	Method	Remarks
21 Dec 22	Commencement of Stage 2 and initial design options for feedback (Annex C).	Email	
16 Jan 23	Reminder for feedback on initial airspace design options.	Email	



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57733 - Fairoaks Airport

Date	Summary of Engagement	Method	Remarks
21 Dec 22	Commencement of Stage 2 and initial design options for feedback (Annex C).	Email	
16 Jan 23	Reminder for feedback on initial airspace design options.	Email	



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67465 - Farthing Corner Airfield

Date	Summary of Engagement	Method	Remarks
21 Dec 22	Commencement of Stage 2 and initial design options for feedback (Annex C).	Email	
16 Jan 23	Reminder for feedback on initial airspace design options.	Email	



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24324 - Fighter Collection - Chief Pilot

Date	Summary of Engagement	Method	Remarks
21 Dec 22	Commencement of Stage 2 and initial design options for feedback (Annex C).	Email	
16 Jan 23	Reminder for feedback on initial airspace design options.	Email	



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23124 - Flight Sport Aviation

Date	Summary of Engagement	Method	Remarks
21 Dec 22	Commencement of Stage 2 and initial design options for feedback (Annex C).	Email	
16 Jan 23	Reminder for feedback on initial airspace design options.	Email	



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67468 - Flying Farmers Association

Date	Summary of Engagement	Method	Remarks
21 Dec 22	Commencement of Stage 2 and initial design options for feedback (Annex C).	Email	
16 Jan 23	Reminder for feedback on initial airspace design options.	Email	



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70102 - General Aviation Alliance (GAA)

Date	Summary of Engagement	Method	Remarks
21 Dec 22	Commencement of Stage 2 and initial design options for feedback (Annex C).	Email	
16 Jan 23	Reminder for feedback on initial airspace design options.	Email	





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98343 - Greenwood Farm Airstrip

Date	Summary of Engagement	Method	Remarks
21 Dec 22	Commencement of Stage 2 and initial design options for feedback (Annex C).	Email	
16 Jan 23	Reminder for feedback on initial airspace design options.	Email	



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10915 - Guild of Air Traffic Control Officers (GATCO)

Date	Summary of Engagement	Method	Remarks
21 Dec 22	Commencement of Stage 2 and initial design options for feedback (Annex C).	Email	
16 Jan 23	Reminder for feedback on initial airspace design options.	Email	



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24354 - Haffenden Aviation

Date	Summary of Engagement	Method	Remarks
21 Dec 22	Commencement of Stage 2 and initial design options for feedback (Annex C).	Email	
16 Jan 23	Reminder for feedback on initial airspace design options.	Email	



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20188 - Hamilton Farm Airfield

Date	Summary of Engagement	Method	Remarks
21 Dec 22	Commencement of Stage 2 and initial design options for feedback (Annex C).	Email	
16 Jan 23	Reminder for feedback on initial airspace design options.	Email	



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58503 - Harringe Airstrip (Kent Microlight Club)

Date	Summary of Engagement	Method	Remarks
21 Dec 22	Commencement of Stage 2 and initial design options for feedback (Annex C).	Email	
22 Dec 22	Query regarding Option 2.	Email	
23 Dec 22	Response, with revised presentation to capture error in Option 2.	Email	Revised presentation including amendment to option 2 uploaded to CAA Airspace Change Portal.
23 Dec 22	Email resending amended presentation of airspace options.	Email	
23 Dec 22	Confirmation of receipt	Email	
28 Dec 22	Feedback received	Email	
10 Jan 22	Thank you for feedback.	Email	

---

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

**Sent:** 10 January 2023 18:21

**To:** [REDACTED]

**Cc:** [REDACTED]

**Subject:** Re: ACP-2021-088 - Stage 2

Thank you [REDACTED].

---

**From:** [REDACTED]

**Sent:** 28 December 2022 21:50

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

[REDACTED]

**Cc:** Airspace Change Proposal Return <airspacechangeproposal@bhlgroup.com>

**Subject:** Re: ACP-2021-088 - Stage 2





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Dear Bristow,

Our response to the change proposal is attached.

## Design Option 1A – Stakeholder Feedback

**We are looking for feedback and wish to understand how this option may impact you.**

Item	Question	Feedback
1	Do you agree with the initial assessment against the agreed Design Principles? If not please provide details?	Yes
2	How would this option impact you?	Very badly, with a very large chunk of airspace closed off to GA crossing or operating in the channel.
3	Do you have any alternative airspace construct suggestions that will meet the statement of need and align with Design Principles?	No
4	Do you have any alternative airspace management suggestions that can be considered that will meet the statement of need and Design Principles?	No
5	Free Text	This is the worst of the three options for us at Harringe



## Design Option 1B – Stakeholder Feedback

**We are looking for feedback and wish to understand how this option may impact you.**

Item	Question	Feedback
1	Do you agree with the initial assessment against the agreed Design Principles? If not please provide details?	Yes
2	How would this option impact you?	This is a better option but the DACS may be declined. This has not been clarified. In Summer crossings are often later than the DACS hours. Can operating hours be extended for summer period (or pre-agreed periods) to allow safer movement?
3	Do you have any alternative airspace construct suggestions that will meet the statement of need and align with Design Principles?	No
4	Do you have any alternative airspace management suggestions that can be considered that will meet the statement of need and Design Principles?	No
5	Free Text	This is a better option than option 1A for Harringe/KMAC



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## Design Option 2 – Stakeholder Feedback

**We are looking for feedback and wish to understand how this option may impact you.**

Item	Question	Feedback
1	Do you agree with the initial assessment against the agreed Design Principles? If not please provide details?	Yes
2	How would this option impact you?	This has potential but the corridors are pinch points and the airspace is the wrong way round.
3	Do you have any alternative airspace construct suggestions that will meet the statement of need and align with Design Principles?	Whilst you say that the vertical dimensions of the airspace can't be changed due to technical constraints, you actually change the margins in this example by admitting the drone can operate in a 1,000ft vertical sandwich, one option would be to have the two corridors between 1,000ft and 1,500ft, to allow GA to travel either way when the cloudbase is lower during VFR flight. The drone would operate in the 1,000ft AMSL.
4	Do you have any alternative airspace management suggestions that can be considered that will meet the statement of need and Design Principles?	No
5	Free Text	Putting GA in the bottom 1,500 ft and the drone above is the wrong way round - GA would not want to be below 1,000ft in the channel

**From:** [REDACTED]  
**Sent:** 23 December 2022 09:28  
**To:** Airspace Change Proposal <airspacechangeproposal@bristowgroup.com>  
**Subject:** Re: ACP-2021-088 - Stage 2 - clarification on Design option 2

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

Thanks very much, sorted...

On 23/12/2022 09:13, Airspace Change Proposal wrote:

[REDACTED],

Presentation attached as not sure it went through.





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Best Regards,

██████████

---

**From:** Airspace Change Proposal <airspacechangeproposal@bristowgroup.com>  
**Sent:** 23 December 2022 09:03  
**To:** ██████████  
**Cc:** Airspace Change Proposal <airspacechangeproposal@bristowgroup.com>  
**Subject:** Re: ACP-2021-088 - Stage 2 - clarification on Design option 2

Good Morning ██████████,

Thank you for your email, you are correct there is an error in the slide which I have amended and attached. The updated presentation will be uploaded to the CAA Airspace Change Portal today.

To answer your question, option 2 would require the ceilings of D098D and C to be raised to 2500ft to enable the corridors from SFC to 1500ft.

If you have any other queries, please let us know.

Best Regards,

██████████

---

**From:** ██████████  
**Sent:** 22 December 2022 14:23  
**To:** Airspace Change Proposal <airspacechangeproposal@bristowgroup.com>; ██████████  
██████████  
**Cc:** Airspace Policy <Airspace.Policy@caa.co.uk>  
**Subject:** ACP-2021-088 - Stage 2 - clarification on Design option 2

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Dear Bristow Helicopters,

On the first slide for Design Option 2 you say:





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***DA complex of D008 D  
ceiling increased to  
2500ft to enable corridor  
from SFC to 1500ft.***

Does this mean that you would take the combined areas of D098C and D098D, raise the ceiling to 2,500ft and then place the corridors as indicated?

I can't see a D008D indicated on other drawings nor explained anywhere in the text.

Maybe I have missed something, but maybe I'm not the only one.

Regards,

██████

On 21/12/2022 17:24, Airspace Change Proposal wrote:

---

Dear Stakeholder,

We are writing to you today to let you know that we successfully passed the Stage 1 gateway for ACP-2021-088, consequently we have progressed to Stage 2 - Develop & Assess. The initial stage (Stage - 2A) involves the development of airspace options, which are tested with you, our stakeholders.

Consequently, several options have been developed, and we would like to preliminarily test these options with you to ensure that you are satisfied that the design options align with the design principles and that we as the change sponsor have understood and accounted for your concerns within the design options. These options are set out within the attached presentation and PDF.

We would welcome your feedback on each of the design options and have included a feedback form to aid this, though we are happy to receive feedback in any appropriate formats. Any feedback needs to be returned to us at [airspacechangeproposal@bhigroup.com](mailto:airspacechangeproposal@bhigroup.com) by the 30 January 2023.

Further details of the proposal can be found at [Airspace change portal \(caa.co.uk\)](https://caa.co.uk), then selecting 'search by Airspace Change ID' and entering ACP reference ACP-2021-088.



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Guidance relating to the Airspace Change Proposal and the process we are required to follow by the CAA can be found at <https://airspacechange.caa.co.uk/about-airspace-change/> and specifically CAP1616.

If you no longer wish to be included in further communications regarding this ACP, please reply to this email with 'STOP' in the subject and you will be removed from the stakeholder list.

We look forward to your feedback and continued engagement in this process.

Kind Regards,

**Bristow Search & Rescue**

Dyce Avenue

Dyce, Aberdeen

AB21 0LQ



*Global Leader in Vertical Flight*

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**Bristow**  
Search and Rescue

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██████████  
██████████████████  
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09080 - Hayward & Green

Date	Summary of Engagement	Method	Remarks
21 Dec 22	Commencement of Stage 2 and initial design options for feedback (Annex C).	Email	
16 Jan 23	Reminder for feedback on initial airspace design options.	Email	



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43283 - Heavy Airlines

Date	Summary of Engagement	Method	Remarks
21 Dec 22	Commencement of Stage 2 and initial design options for feedback (Annex C).	Email	
16 Jan 23	Reminder for feedback on initial airspace design options.	Email	



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90425 - Helicopter Club of Great Britain (HCGB)

Date	Summary of Engagement	Method	Remarks
21 Dec 22	Commencement of Stage 2 and initial design options for feedback (Annex C).	Email	
16 Jan 23	Reminder for feedback on initial airspace design options.	Email	
14 Feb 23	Feedback on draft airspace design options.	Email	
21 Feb 23	Thank you for feedback.	Email	

---

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

**Sent:** 21 February 2023 18:55

**To:** [REDACTED]

**Subject:** Re: ACP 088/2021

Good Evening [REDACTED]

Thank you for your feedback, which we have included for consideration as we refine the draft airspace design options.

Best Regards,

[REDACTED]

---

**From:** [REDACTED]

**Sent:** 14 February 2023 11:43

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

**Subject:** ACP 088/2021

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



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Dear Sirs,

We write in response to the above proposal.

1. This is the formal response of the Helicopter Club of Great Britain
2. We originally responded before the February 10 2023 date given in your document, but that document contained an incorrect email address for responses.
3. Only option 1B, i.e. with a DACS, is acceptable for light helicopter operations across the English Channel.
4. Such DACS must be available when the Danger Area is active, from say 08:00 to sunset. VHF radio coverage must be available at 500ft AMSL and above at beyond the FIR boundary to allow France to UK traffic to make contact before entering the DA. There needs to be a direct telephone line for pilots to contact the DACS operator to ascertain activity etc, with a recorded message played if the DA is not active, to give pilots certainty. The DACS operator should also have a traffic awareness tool such as Flight Radar 24 to assist separation from the drone.

Your assessments do not adequately consider restraints of cloud base and visibility which are critical to low level VFR helicopter operations.

5. Design option 2 is not satisfactory due to likely weather constraints and the higher top of the DA.
6. Practically, in good weather, light helicopters will mostly fly above 1500 ft, and thus avoid the option 1B DA.

Please feel free to contact me to discuss, and please acknowledge receipt of this email.

Regards

[Redacted signature block]

---

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

**Sent:** 16 January 2023 15:43

**To:** [Redacted]

**Subject:** Re: ACP-2021-088 - Stage 2

Dear Stakeholder,





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We recently emailed to invite opinions on the initial airspace options of our airspace change proposal, and wanted to provide a reminder in case you or your organisation want to provide feedback. If you can send any feedback by the 30 January 23 to [airspacechangeproposal@bristowgroup.com](mailto:airspacechangeproposal@bristowgroup.com) we would be grateful.

In case you missed our previous email, we have appended it below with the details and the accompanying documents are attached.

If you no longer wish to be included in further communications regarding this ACP, please reply to this email with 'STOP' in the subject and you will be removed from the stakeholder list.

Kind Regards,

### **Bristow Search & Rescue**

Dyce Avenue  
Dyce, Aberdeen  
AB21 0LQ



*Global Leader in Vertical Flight*

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

**Sent:** 21 December 2022 17:25

**To:** [REDACTED]

**Subject:** ACP-2021-088 - Stage 2

Dear Stakeholder,

We are writing to you today to let you know that we successfully passed the Stage 1 gateway for ACP-2021-088, consequently we have progressed to Stage 2 - Develop & Assess. The initial





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stage (Stage - 2A) involves the development of airspace options, which are tested with you, our stakeholders.

Consequently, several options have been developed, and we would like to preliminarily test these options with you to ensure that you are satisfied that the design options align with the design principles and that we as the change sponsor have understood and accounted for your concerns within the design options. These options are set out within the attached presentation and PDF.

We would welcome your feedback on each of the design options and have included a feedback form to aid this, though we are happy to receive feedback in any appropriate formats. Any feedback needs to be returned to us at [airspacechangeproposal@bhigroup.com](mailto:airspacechangeproposal@bhigroup.com) by the 30 January 2023.

Further details of the proposal can be found at [Airspace change portal \(caa.co.uk\)](https://www.caa.co.uk/airspace-change), then selecting 'search by Airspace Change ID' and entering ACP reference ACP-2021-088.

Guidance relating to the Airspace Change Proposal and the process we are required to follow by the CAA can be found at <https://airspacechange.caa.co.uk/about-airspace-change/> and specifically CAP1616.

If you no longer wish to be included in further communications regarding this ACP, please reply to this email with 'STOP' in the subject and you will be removed from the stakeholder list.

We look forward to your feedback and continued engagement in this process.

Kind Regards,

**Bristow Search & Rescue**

Dyce Avenue  
Dyce, Aberdeen  
AB21 0LQ





Maritime &  
Coastguard  
Agency



**Bristow**  
Search and Rescue

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---



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91786 - Home Office - Border Force

Date	Summary of Engagement	Method	Remarks
21 Dec 22	Commencement of Stage 2 and initial design options for feedback (Annex C).	Email	
21 Dec 22	Out of Office reply.	Email	
16 Jan 23	Reminder for feedback on initial airspace design options.	Email	
27 Jan 23	Response provided though Home Office Clandestine Channel Threat Command (CCTC).	Email	

**From:** [REDACTED]  
**Sent:** 21 December 2022 17:27  
**To:** Airspace Change Proposal <airspacechangeproposal@bristowgroup.com>  
**Subject:** Automatic reply: ACP-2021-088 - Stage 2

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

Thank you for your message. I'm out of the office, returning 3 Jan 23.

For anything urgent please email [REDACTED] at: [REDACTED]

Regards.

[REDACTED]

\*\*\*\*\*

This email and any files transmitted with it are private and intended solely for the use of the individual or entity to whom they are addressed. If you have received this email in error please return it to the address it came from telling them it is not for you and then delete it from your system.





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This email message has been swept for computer viruses.

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26419 - Home Office - Clandestine Channel Threat Command (CCTC)

Date	Summary of Engagement	Method	Remarks
21 Dec 22	Commencement of Stage 2 and initial design options for feedback (Annex C).	Email	
16 Jan 23	Reminder for feedback on initial airspace design options.	Email	
27 Jan 23	Feedback on initial airspace design options.	Email	
27 Jan 23	Thank you for feedback, your response has been past to the MCA.	Email	
13 Feb 23	Email from MCA summarising discussions between MCA and Home Office.	Email	

**From:** [REDACTED]  
**Sent:** 13 February 2023 14:53  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** 20230213\_Outcome of MCA / HO Airspace Meeting

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

Hi [REDACTED],

As discussed, here are the details from the meeting held this afternoon for the submission notes.

Meeting held at 1330 on 13/02/23

Attendees: [REDACTED] (MCA), [REDACTED] (MCA), [REDACTED] (HO)



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**Bristow**  
Search and Rescue

After discussions with the Home Office to clarify MCA intentions for the airspace and its administration, they have now offered to provide SME support to assist in the process with MCA and BHL and are now in support of the application.

Kind Regards

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Maritime and Coastguard Agency

█  
█  
█

Safer Lives, Safer Ships, Cleaner Seas

[www.gov.uk/mca](http://www.gov.uk/mca)



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Incoming and outgoing e-mail messages are routinely monitored for compliance with our policy on the use of electronic communications and for other lawful purposes.

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

**Sent:** 27 January 2023 14:02

**To:** █

█

Airspace Change Proposal

<airspacechangeproposal@bristowgroup.com>

**Subject:** Re: ACP-2021-088 - Stage 2

Good Afternoon █,





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Thank you for your feedback, we have passed these to the MCA so that they can pick up your concerns directly.

Best Regards,

[Redacted]

---

**From:** [Redacted]  
**Sent:** 27 January 2023 12:45  
**To:** Airspace Change Proposal <airspacechangeproposal@bristowgroup.com>  
**Cc:** [Redacted]  
**Subject:** RE: ACP-2021-088 - Stage 2

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

Please find attached the Home Office response to your airspace change proposal.

Thanks

[Redacted]

[Redacted]  
[Redacted]  
[Redacted]  
[Redacted]

Home Office

[Redacted]  
[Redacted]  
[Redacted]





**Home Office Response to Bristow / Maritime and Coastguard Agency Airspace Change  
Options at Stage 2A of ACP 2021-088**

1. Bristow, on behalf of the Maritime and Coastguard Agency (MCA), have invited comment on Stage 2A of ACP-008-2021.
2. The Home Office currently owns and coordinates the temporary danger (TDA) area over the English Channel that is used by multiple assets operated by the Home Office and its contractors. This application for a change to the current airspace was made by the MCA without prior consultation, despite regular opportunities to do so.
3. Whilst the Home Office can and does routinely support SOLAS activity, it has a remit that goes significantly beyond that of the Coastguard (who cannot provide reciprocal support as a matter of policy or capability) and therefore the Home Office cannot agree to another agency taking responsibility for the coordination or prioritisation of deployments, some of which will be sensitive and linked to national security.
4. Furthermore, the Home Office owns and operates the majority of the unmanned systems currently operating or scheduled to operate in the TDA, has more suppliers operating different RPAS platforms simultaneously in the airspace, and performs (and will continue to perform) the highest number of unmanned flying hours and be the primary user of the TDA. As such, the Home Office should retain responsibility for safely deconflicting the airspace.
5. Any change to the current arrangements where the Home Office is no longer the **owner** and **coordinator** of the airspace presents a potential risk to our ability to discharge our national security, law enforcement, and other functions. Any proposal to modify these arrangements will invite a formal objection, at Secretary of State level if necessary, to safeguard national security interests.
6. The current temporary danger area (TDA D098) provides the required level of access for current Home Office operations, but we acknowledge that the indefinite extension of the TDA isn't acceptable because of CAA regulatory and policy requirements. Additionally, a review of the dimensions and height restrictions of the current arrangements is needed to facilitate greater access to the wider aviation community, while also allowing the development of future HO operational requirements.
7. The HO are therefore able to offer the following responses to Bristow's request for input into Stage 2A of ACP-008-2021, and will continue to work with Bristow and the CAA to resolve the issue of airspace management going forward.
8. HO replies to Bristow's ACP-008-202, Stage 2A request:

**Option 0 - Baseline do nothing.**

Description. The airspace environment that existed prior to the existence of the Temporary Danger Area (TDA) complex D098, based on Class G airspace.

HO Response. This option is **not acceptable** to the HO. Current Regulation regarding UAS operations ((EU) 2019/947 Article 12. Para 2, (b). and CAA CAP 722 2.1.3 BVLOS) would prohibit HO operations in non-segregated airspace. At this time there is no CAA approved Detect and Avoid System to operate in segregated Airspace.



**Option 1A** – TDA like construct with Danger Area Segregating Information Service (DAAIS) Only

Description. The transition of the current Temporary Danger Area (TDA) into a permanent Danger Area with an airspace management mitigation:

HO Response. This option is **acceptable** but provides no enhanced crossing service for general aviation. A study into the scope of the size of the TDA is recommended (see para 6 & 7).

**Option 1B** - TDA like construct with DAAIS and Danger Area Crossing Service (DACS)

Description. The transition of the current Temporary Danger Area (TDA) into a permanent Danger Area with a variety of airspace management constructs.

HO Response. This option is **preferred** but would require an outside agency to provide the crossing service. This could impede operational access depending upon the hours of operation. A study into the scope of the size of the TDA is recommended (see para 6 & 7).

**Option 2** – Danger Area with Crossing Corridor

Description. The transition of the current TDA into a permanent Danger Area with an "open" corridor to enable transit of other air users.

HO Response. This option is **not acceptable** to the HO. This option will lead to a reduction in safety and would likely preclude GA operations in the "corridors" when the cloud ceiling was 1500ft or less. When a SOLAS event happened in the corridor it would place GA/SAR traffic in the same space reducing safety.

9. A comprehensive review of the size and scope of the required airspace is required to ensure that operational goals are met, while affording the maximum access to GA.
10. The operating parameters of current platforms, and of future operational assets should be considered before changes to the dimension of the TDA are considered, for example (and not limited to):
  - The height in TDA098 E up to 2500ft is not required. Limiting UAS activity to 1500ft would return airspace for GA use.
  - The height in TDA098 G up to 2000ft is not required Limiting UAS activity to 1500ft would return airspace for GA use.
  - The design of TDA098 F should be reviewed as it does not need to include space over land.
  - TDA D098E, C, A & G should be moved to include the shoreline. This will allow future concepts of UAV operations.
11. **Innovation.** The HO is also keen to explore alternate airspace arrangements in line with the CAA Airspace Modernisation Strategy. An example of this could be the implantation of a Flight Information Service supported by a Flight Information Display (FIDS) – potentially located at Lydd, or an alternate ADSB managed airspace solution.



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Home Office

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

**Sent:** 16 January 2023 15:45

**To:** [REDACTED]

**Subject:** Re: ACP-2021-088 - Stage 2

Do you trust this email? This email originated from outside the Home Office, or came from a Home Office system that has not been certified. Please exercise caution before opening attachments or clicking on links within this email or any suspicious email, particularly from unknown senders.

Dear Stakeholder,

We recently emailed to invite opinions on the initial airspace options of our airspace change proposal, and wanted to provide a reminder in case you or your organisation want to provide feedback. If you can send any feedback by the 30 January 23 to [airspacechangeproposal@bristowgroup.com](mailto:airspacechangeproposal@bristowgroup.com) we would be grateful.

In case you missed our previous email, we have appended it below with the details and the accompanying documents are attached.

If you no longer wish to be included in further communications regarding this ACP, please reply to this email with 'STOP' in the subject and you will be removed from the stakeholder list.

Kind Regards,

**Bristow Search & Rescue**

Dyce Avenue  
Dyce, Aberdeen  
AB21 0LQ





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---

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

**Sent:** 21 December 2022 17:25

**To:** [REDACTED]

[REDACTED]

**Subject:** ACP-2021-088 - Stage 2

Dear [REDACTED],

We are writing to you today to let you know that we successfully passed the Stage 1 gateway for ACP-2021-088, consequently we have progressed to Stage 2 - Develop & Assess. The initial stage (Stage - 2A) involves the development of airspace options, which are tested with you, our stakeholders.

Consequently, several options have been developed, and we would like to preliminarily test these options with you to ensure that you are satisfied that the design options align with the design principles and that we as the change sponsor have understood and accounted for your concerns within the design options. These options are set out within the attached presentation and PDF.

We would welcome your feedback on each of the design options and have included a feedback form to aid this, though we are happy to receive feedback in any appropriate formats. Any feedback needs to be returned to us at [airspacechangeproposal@bhlgroup.com](mailto:airspacechangeproposal@bhlgroup.com) by the 30 January 2023.

Further details of the proposal can be found at [Airspace change portal \(caa.co.uk\)](https://airspacechangeportal.caa.co.uk), then selecting 'search by Airspace Change ID' and entering ACP reference ACP-2021-088.

Guidance relating to the Airspace Change Proposal and the process we are required to follow by the CAA can be found at <https://airspacechange.caa.co.uk/about-airspace-change/> and specifically CAP1616.

If you no longer wish to be included in further communications regarding this ACP, please reply to this email with 'STOP' in the subject and you will be removed from the stakeholder list.

We look forward to your feedback and continued engagement in this process.

Kind Regards,



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**Bristow Search & Rescue**  
Dyce Avenue  
Dyce, Aberdeen  
AB21 0LQ



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76543 - Home Office - Kent Police

Date	Summary of Engagement	Method	Remarks
21 Dec 22	Commencement of Stage 2 and initial design options for feedback (Annex C).	Letter	
16 Jan 23	Reminder for feedback on initial airspace design options.	Letter	



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11232 - Honourable Company of Air Pilots (HCAP)

Date	Summary of Engagement	Method	Remarks
21 Dec 22	Commencement of Stage 2 and initial design options for feedback (Annex C).	Email	
16 Jan 23	Reminder for feedback on initial airspace design options.	Email	



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67456 - [REDACTED]

Date	Summary of Engagement	Method	Remarks
21 Dec 22	Commencement of Stage 2 and initial design options for feedback (Annex C).	Email	
22 Dec 22	Email requesting TDA usage figures over past 12 months.	Email	
23 Dec 22	Response.	Email	

---

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

**Sent:** 23 December 2022 08:39

**To:** [REDACTED]

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

**Subject:** Re: ACP-2021-088 - Stage 2

Good Morning [REDACTED],

Thank you for your email, I am afraid we don't have access to that information at this time as the current TDA complex is managed by Tekever on behalf of the Home Office. Therefore Tekever would be your best point of contact, although I am sure the CAA also has this information, which you could request.

Best Regards,

[REDACTED]

---

**From:** [REDACTED]

**Sent:** 22 December 2022 16:59

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

**Subject:** Re: ACP-2021-088 - Stage 2

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Many thanks for your email. May I ask how many days over the last 12 months have had drone activity during the hours of daylight? The information may have been provided, but I have not managed to find it.

Many thanks



---

On Wed, 21 Dec 2022 at 17:27, Airspace Change Proposal <[airspacechangeproposal@bristowgroup.com](mailto:airspacechangeproposal@bristowgroup.com)> wrote:

Dear Stakeholder,

We are writing to you today to let you know that we successfully passed the Stage 1 gateway for ACP-2021-088, consequently we have progressed to Stage 2 - Develop & Assess. The initial stage (Stage - 2A) involves the development of airspace options, which are tested with you, our stakeholders.

Consequently, several options have been developed, and we would like to preliminarily test these options with you to ensure that you are satisfied that the design options align with the design principles and that we as the change sponsor have understood and accounted for your concerns within the design options. These options are set out within the attached presentation and PDF.

We would welcome your feedback on each of the design options and have included a feedback form to aid this, though we are happy to receive feedback in any appropriate formats. Any feedback needs to be returned to us at [airspacechangeproposal@bhlgroup.com](mailto:airspacechangeproposal@bhlgroup.com) by the 30 January 2023.

Further details of the proposal can be found at [Airspace change portal \(caa.co.uk\)](https://airspacechangeportal.caa.co.uk), then selecting 'search by Airspace Change ID' and entering ACP reference ACP-2021-088.

Guidance relating to the Airspace Change Proposal and the process we are required to follow by the CAA can be found at <https://airspacechange.caa.co.uk/about-airspace-change/> and specifically CAP1616.

If you no longer wish to be included in further communications regarding this ACP, please reply to this email with 'STOP' in the subject and you will be removed from the stakeholder list.

We look forward to your feedback and continued engagement in this process.





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Kind Regards,

**Bristow Search & Rescue**

Dyce Avenue  
Dyce, Aberdeen  
AB21 0LQ



*Global Leader in Vertical Flight*

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The information contained in this communication from the sender is confidential. It is intended solely for use by the recipient and others authorized to receive it. If you are not the recipient, you are hereby notified that any disclosure, copying, distribution or taking action in relation of the contents of this information is strictly prohibited and may be unlawful.

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[Redacted signature block]

[#FLY2022](#) - Join *FLYER* with our campaign to encourage pilots to fly 2,022+ minutes this year. Post your photos on social media, send us your flying adventures, and get involved if you're an aviation company. We'd like your support!





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**Bristow**  
Search and Rescue

[Redacted text block]



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08160 - Iprosurv

Date	Summary of Engagement	Method	Remarks
21 Dec 22	Commencement of Stage 2 and initial design options for feedback (Annex C).	Email	
16 Jan 23	Reminder for feedback on initial airspace design options.	Email	



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54637 - Isle of Man CAA

Date	Summary of Engagement	Method	Remarks
21 Dec 22	Commencement of Stage 2 and initial design options for feedback (Annex C).	Email	
16 Jan 23	Reminder for feedback on initial airspace design options.	Email	



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23434 - [REDACTED]

Date	Summary of Engagement	Method	Remarks
21 Dec 22	Commencement of Stage 2 and initial design options for feedback (Annex C).	Email	
31 Dec 22	Feedback on initial airspace design options.	Email	
10 Jan 23	Thank you for feedback.	Email	

---

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

**Sent:** 10 January 2023 19:39

**To:** [REDACTED]

**Subject:** Re: Feedback on channel DA consultation

Good Evening [REDACTED],

Thank you for your feedback.

Best Regards,

[REDACTED]

---

**From:** [REDACTED]

**Sent:** 31 December 2022 13:27

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

**Subject:** Feedback on channel DA consultation

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---

The only viable compromise is to implement BOTH option 1B and the proposed corridors from Option 2.





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[REDACTED]

[REDACTED]

[REDACTED]

---

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

**Sent:** 21 December 2022 19:16

**To:** [REDACTED]

**Subject:** ACP-2021-088 - Stage 2

Dear Stakeholder,

We are writing to you today to let you know that we successfully passed the Stage 1 gateway for ACP-2021-088, consequently we have progressed to Stage 2 - Develop & Assess. The initial stage (Stage - 2A) involves the development of airspace options, which are tested with you, our stakeholders.

Consequently, several options have been developed, and we would like to preliminarily test these options with you to ensure that you are satisfied that the design options align with the design principles and that we as the change sponsor have understood and accounted for your concerns within the design options. These options are set out within the attached presentation and PDF.

We would welcome your feedback on each of the design options and have included a feedback form to aid this, though we are happy to receive feedback in any appropriate formats. Any feedback needs to be returned to us at [airspacechangeproposal@bhlgroup.com](mailto:airspacechangeproposal@bhlgroup.com) by the 30 January 2023.

Further details of the proposal can be found at [Airspace change portal \(caa.co.uk\)](https://www.caa.co.uk/airspace-change), then selecting 'search by Airspace Change ID' and entering ACP reference ACP-2021-088.

Guidance relating to the Airspace Change Proposal and the process we are required to follow by the CAA can be found at <https://airspacechange.caa.co.uk/about-airspace-change/> and specifically CAP1616.



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If you no longer wish to be included in further communications regarding this ACP, please reply to this email with 'STOP' in the subject and you will be removed from the stakeholder list.

We look forward to your feedback and continued engagement in this process.

Kind Regards,

**Bristow Search & Rescue**

Dyce Avenue  
Dyce, Aberdeen  
AB21 0LQ



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74793 - Kent County Council

Date	Summary of Engagement	Method	Remarks
21 Dec 22	Commencement of Stage 2 and initial design options for feedback (Annex C).	Email	
21 Dec 22	Automated Response	Email	
16 Jan 23	Reminder for feedback on initial airspace design options.	Email	
16 Jan 22	Automated Response	Email	

**From:** county.hall@kent.gov.uk <county.hall@kent.gov.uk>

**Sent:** 16 January 2023 16:01

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

**Subject:** \*\* This is an automatically generated email notification. Please do not respond to this email \*\*

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

Thank you for contacting Kent County Council. We will respond to your email within 5 working days, unless your email relates to a **Highways** matter.

If your email relates to a highway's enquiry (an issue with the roads or pavements), we do not offer an email response service and your email will not be investigated.

**To log a new issue or to track an existing report, please use our online highways fault reporting tool by clicking this link: [www.kent.gov.uk/highwayfaults](http://www.kent.gov.uk/highwayfaults).**

Other information can be found by clicking the following links:

- For a Driver Education course; [www.kent.gov.uk/roads-and-travel/road-safety/driver-improvement-courses](http://www.kent.gov.uk/roads-and-travel/road-safety/driver-improvement-courses)
- For Road safety (eg: 20mph zones or traffic calming): [www.kent.gov.uk/roads-and-travel/what-we-look-after/roads/changing-roads-in-your-area](http://www.kent.gov.uk/roads-and-travel/what-we-look-after/roads/changing-roads-in-your-area)
- For crash data enquiries: [www.kent.gov.uk/roads-and-travel/road-safety/crash-and-casualty-data](http://www.kent.gov.uk/roads-and-travel/road-safety/crash-and-casualty-data)





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- For feedback about the Highway services (including complaints or compliments): [www.kent.gov.uk/about-the-council/contact-us/complaints-and-feedback](http://www.kent.gov.uk/about-the-council/contact-us/complaints-and-feedback)

**\*\*This is an automatically generated email notification. Please do not respond to this email\*\***

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**From:** county.hall@kent.gov.uk <county.hall@kent.gov.uk>

**Sent:** 21 December 2022 18:02

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

**Subject:** \*\* This is an automatically generated email notification. Please do not respond to this email \*\*

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Thank you for contacting Kent County Council. We will respond to your email within 5 working days, unless your email relates to a **Highways** matter.

If your email relates to a highway's enquiry (an issue with the roads or pavements), we do not offer an email response service and your email will not be investigated.

**To log a new issue or to track an existing report, please use our online highways fault reporting tool by clicking this link: [www.kent.gov.uk/highwayfaults](http://www.kent.gov.uk/highwayfaults).**

Other information can be found by clicking the following links:

- For a Driver Education course; [www.kent.gov.uk/roads-and-travel/road-safety/driver-improvement-courses](http://www.kent.gov.uk/roads-and-travel/road-safety/driver-improvement-courses)
- For Road safety (eg: 20mph zones or traffic calming): [www.kent.gov.uk/roads-and-travel/what-we-look-after/roads/changing-roads-in-your-area](http://www.kent.gov.uk/roads-and-travel/what-we-look-after/roads/changing-roads-in-your-area)
- For crash data enquiries: [www.kent.gov.uk/roads-and-travel/road-safety/crash-and-casualty-data](http://www.kent.gov.uk/roads-and-travel/road-safety/crash-and-casualty-data)
- For feedback about the Highway services (including complaints or compliments): [www.kent.gov.uk/about-the-council/contact-us/complaints-and-feedback](http://www.kent.gov.uk/about-the-council/contact-us/complaints-and-feedback)

**\*\*This is an automatically generated email notification. Please do not respond to this email\*\***



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99999 - Kent Surrey & Sussex Air Ambulance

Date	Summary of Engagement	Method	Remarks
21 Dec 22	Commencement of Stage 2 and initial design options for feedback (Annex C).	Email	
21 Dec 22	Automated response.	Email	
16 Jan 23	Reminder for feedback on initial airspace design options.	Email	
16 Jan 23	Automated response	Email	
17 Jan 23	Request to be removed from stakeholder list.	Email	

---

**From:** [REDACTED]  
**Sent:** 17 January 2023 09:13  
**To:** Airspace Change Proposal <airspacechangeproposal@bristowgroup.com>  
**Subject:** STOP

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

---

**From:** [REDACTED]  
**Sent:** 16 January 2023 16:01  
**To:** Airspace Change Proposal <airspacechangeproposal@bristowgroup.com>  
**Subject:** Automatic reply: ACP-2021-088 - Stage 2

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

---

Thanks for emailing Air Ambulance Charity Kent Surrey Sussex (KSS).

This auto-reply is to let you know we've received your email and a member of Team KSS will be in touch with you within three working days.





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Find out more about our critical care at [www.aakss.org.uk](http://www.aakss.org.uk), or sign up to our digital newsletter by visiting [www.aakss.org.uk/newsletter](http://www.aakss.org.uk/newsletter).

If it's urgent or you need to speak to us on the phone please call 01634 471 900 between 9am and 5pm Monday - Thursday and between 9am and 4:30pm on Fridays.

Thank you,  
KSS Supporter Care Team

---

**From:** Airspace Change Proposal <[airspacechangeproposal@bristowgroup.com](mailto:airspacechangeproposal@bristowgroup.com)>  
**Sent:** 16 January 2023 16:01  
**To:** Hello [REDACTED]  
**Subject:** Re: ACP-2021-088 - Stage 2

Dear Stakeholder,

We recently emailed to invite opinions on the initial airspace options of our airspace change proposal, and wanted to provide a reminder in case you or your organisation want to provide feedback. If you can send any feedback by the 30 January 23 to [airspacechangeproposal@bristowgroup.com](mailto:airspacechangeproposal@bristowgroup.com) we would be grateful.

In case you missed our previous email, we have appended it below with the details and the accompanying documents are attached.

If you no longer wish to be included in further communications regarding this ACP, please reply to this email with 'STOP' in the subject and you will be removed from the stakeholder list.

Kind Regards,

### **Bristow Search & Rescue**

Dyce Avenue  
Dyce, Aberdeen  
AB21 0LQ



*Global Leader in Vertical Flight*





Maritime &  
Coastguard  
Agency



---

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

**Sent:** 21 December 2022 18:02

**To:** Hello [REDACTED]

**Subject:** ACP-2021-088 - Stage 2

Dear Stakeholder,

We are writing to you today to let you know that we successfully passed the Stage 1 gateway for ACP-2021-088, consequently we have progressed to Stage 2 - Develop & Assess. The initial stage (Stage - 2A) involves the development of airspace options, which are tested with you, our stakeholders.

Consequently, several options have been developed, and we would like to preliminarily test these options with you to ensure that you are satisfied that the design options align with the design principles and that we as the change sponsor have understood and accounted for your concerns within the design options. These options are set out within the attached presentation and PDF.

We would welcome your feedback on each of the design options and have included a feedback form to aid this, though we are happy to receive feedback in any appropriate formats. Any feedback needs to be returned to us at [airspacechangeproposal@bhlgroup.com](mailto:airspacechangeproposal@bhlgroup.com) by the 30 January 2023.

Further details of the proposal can be found at [Airspace change portal \(caa.co.uk\)](https://airspacechangeportal.caa.co.uk), then selecting 'search by Airspace Change ID' and entering ACP reference ACP-2021-088.

Guidance relating to the Airspace Change Proposal and the process we are required to follow by the CAA can be found at <https://airspacechange.caa.co.uk/about-airspace-change/> and specifically CAP1616.

If you no longer wish to be included in further communications regarding this ACP, please reply to this email with 'STOP' in the subject and you will be removed from the stakeholder list.

We look forward to your feedback and continued engagement in this process.

Kind Regards,

**Bristow Search & Rescue**  
Dyce Avenue





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Dyce, Aberdeen  
AB21 0LQ



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**From:** [REDACTED]  
**Sent:** 21 December 2022 18:04  
**To:** Airspace Change Proposal <airspacechangeproposal@bristowgroup.com>  
**Subject:** Automatic reply: ACP-2021-088 - Stage 2

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---

Thanks for emailing Air Ambulance Charity Kent Surrey Sussex (KSS).

This auto-reply is to let you know we've received your email and a member of Team KSS will be in touch with you within three working days.

Find out more about our critical care at [www.aakss.org.uk](http://www.aakss.org.uk), or sign up to our digital newsletter by visiting [www.aakss.org.uk/newsletter](http://www.aakss.org.uk/newsletter).

If it's urgent or you need to speak to us on the phone please call 01634 471 900 between 9am and 5pm Monday - Thursday and between 9am and 4:30pm on Fridays.

Thank you,  
KSS Supporter Care Team



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Coastguard  
Agency



**From:** Airspace Change Proposal <[airspacechangeproposal@bristowgroup.com](mailto:airspacechangeproposal@bristowgroup.com)>  
**Sent:** 21 December 2022 18:02  
**To:** Hello [REDACTED]  
**Subject:** ACP-2021-088 - Stage 2

Dear Stakeholder,

We are writing to you today to let you know that we successfully passed the Stage 1 gateway for ACP-2021-088, consequently we have progressed to Stage 2 - Develop & Assess. The initial stage (Stage - 2A) involves the development of airspace options, which are tested with you, our stakeholders.

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Kind Regards,

**Bristow Search & Rescue**  
Dyce Avenue  
Dyce, Aberdeen  
AB21 0LQ





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96785 - Kent Wildlife Trust

Date	Summary of Engagement	Method	Remarks
21 Dec 22	Commencement of Stage 2 and initial design options for feedback (Annex C).	Email	
16 Jan 23	Reminder for feedback on initial airspace design options.	Email	



23765 - Kittyhawk Aerodrome

Date	Summary of Engagement	Method	Remarks
21 Dec 22	Commencement of Stage 2 and initial design options for feedback (Annex C).	Email	
16 Jan 23	Reminder for feedback on initial airspace design options.	Email	
28 Jan 23	Feedback on the initial airspace change proposal.	Email	
30 Jan 23	Thank you for feedback.	Email	
31 Jan 23	Introduction to Pilot Aware	Email.	
8 Feb 23	Thank you for contact details.	Email.	

---

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

**Sent:** 08 February 2023 08:36

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

**Subject:** Re: ACP-20210088 Stage 2A -Stakeholder Feedback

Good Morning [REDACTED],

Thank you, for [REDACTED] details we will get in touch.

[REDACTED],

Do you have a good time to call this week to understand pilot aware in a bit more detail and discuss what might and might not be possible?

Best Regards,

[REDACTED]



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**From:** [REDACTED]  
**Sent:** 31 January 2023 09:54  
**To:** Airspace Change Proposal <airspacechangeproposal@bristowgroup.com>  
**Cc:** [REDACTED]  
**Subject:** Re: ACP-20210088 Stage 2A -Stakeholder Feedback

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

Dear [REDACTED],

Further to my comments about detecting cross-channel traffic may I introduce [REDACTED] (in copy) of PilotAware?

[www.pilotaware.com](http://www.pilotaware.com)

[REDACTED] is part of the pioneering British team that has developed a highly sophisticated Electronic Conspicuity system which successfully helps pilots like me avoid hitting other aircraft. His system is data driven through a server-based network fed by a/c and ground stations. I'm sure he can help you build up a detailed picture to help you benchmark the traffic environment in the vicinity of your operations.

He will be very happy to engage with you; his mobile is [REDACTED]

Kind regards,

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

---

**From:** Airspace Change Proposal <airspacechangeproposal@bristowgroup.com>  
**Sent:** 30 January 2023 11:56  
**To:** [REDACTED]  
**Subject:** Re: ACP-20210088 Stage 2A -Stakeholder Feedback

Good Morning [REDACTED],

Thank you very much for your feedback it is very helpful.





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Regarding the baseline / traffic data we have approached a third party traffic data supplier based on transponder feeds, to improve this element of the ACP. We are just waiting for the data to be prepared and our intention is to use this to improve the baseline in preparation for subsequent stages. We would however be interested to explore any additional data sets that could improve the baseline and our understanding of traffic likely to be impacted by the ACP.

Best Regards,

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 28 January 2023 15:27  
**To:** Airspace Change Proposal <airspacechangeproposal@bristowgroup.com>  
**Cc:** [REDACTED]  
**Subject:** ACP-20210088 Stage 2A -Stakeholder Feedback

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

Dear Sirs,

I write on behalf of Kittyhawk Aerodrome with permission of the owner/operator (in copy) to give feedback on the options presented for comment in your PowerPoint presentation.

Option 1B - Danger Area with DAAIS and DACS is our preferred outcome. We agree with your rating against your Design Principles. The impact on our resident fleet of aircraft that do cross the channel would be as minimal as possible. We have no alternative suggestions for design or management of the airspace.

Whilst writing I would like to draw you attention to Slides 15, 16 & 17 and the data therein. Not all cross channel GA traffic lands at Lydd. Our resident a/c have permission to fly directly to and from the continent under a Certificate of Agreement with Border Force. This is the case for many aerodromes in the UK. I would suggest that your traffic figures are too low as a result. Not every transit of the Channel passes through Lydd's Airspace and so may not be in radio communication with the Air Traffic Service Unit there.

There is a way to gather better data through the proprietors of a particular carry-on Electronic Conspicuity device and if you wish I will be happy to put you in contact with them.



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Regards,

[Redacted signature block]

---

**From:** Airspace Change Proposal <airspacechangeproposal@bristowgroup.com>  
**Sent:** 16 January 2023 16:02  
**To:** [Redacted]  
**Subject:** Re: ACP-2021-088 - Stage 2

Dear Stakeholder,

We recently emailed to invite opinions on the initial airspace options of our airspace change proposal, and wanted to provide a reminder in case you or your organisation want to provide feedback. If you can send any feedback by the 30 January 23 to [airspacechangeproposal@bristowgroup.com](mailto:airspacechangeproposal@bristowgroup.com) we would be grateful.

In case you missed our previous email, we have appended it below with the details and the accompanying documents are attached.

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Kind Regards,

**Bristow Search & Rescue**

Dyce Avenue  
Dyce, Aberdeen  
AB21 0LQ





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Coastguard  
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---

**From:** Airspace Change Proposal <airspacechangeproposal@bristowgroup.com>  
**Sent:** 21 December 2022 18:03  
**To:** [REDACTED]  
**Subject:** ACP-2021-088 - Stage 2

Dear Stakeholder,

We are writing to you today to let you know that we successfully passed the Stage 1 gateway for ACP-2021-088, consequently we have progressed to Stage 2 - Develop & Assess. The initial stage (Stage - 2A) involves the development of airspace options, which are tested with you, our stakeholders.

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We would welcome your feedback on each of the design options and have included a feedback form to aid this, though we are happy to receive feedback in any appropriate formats. Any feedback needs to be returned to us at [airspacechangeproposal@bhigroup.com](mailto:airspacechangeproposal@bhigroup.com) by the 30 January 2023.

Further details of the proposal can be found at [Airspace change portal \(caa.co.uk\)](https://www.caa.co.uk/airspace-change), then selecting 'search by Airspace Change ID' and entering ACP reference ACP-2021-088.

Guidance relating to the Airspace Change Proposal and the process we are required to follow by the CAA can be found at <https://airspacechange.caa.co.uk/about-airspace-change/> and specifically CAP1616.

If you no longer wish to be included in further communications regarding this ACP, please reply to this email with 'STOP' in the subject and you will be removed from the stakeholder list.

We look forward to your feedback and continued engagement in this process.

Kind Regards,



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**Bristow Search & Rescue**

Dyce Avenue  
Dyce, Aberdeen  
AB21 0LQ



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12673 - Lashenden / Headcorn Aerodrome

Date	Summary of Engagement	Method	Remarks
21 Dec 22	Commencement of Stage 2 and initial design options for feedback (Annex C).	Email	
16 Jan 23	Reminder for feedback on initial airspace design options.	Email	





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43256 - Light Aircraft Association (LAA)

Date	Summary of Engagement	Method	Remarks
21 Dec 22	Commencement of Stage 2 and initial design options for feedback (Annex C).	Email	
16 Jan 23	Reminder for feedback on initial airspace design options.	Email	



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64082 - London Gatwick Airport

Date	Summary of Engagement	Method	Remarks
21 Dec 22	Commencement of Stage 2 and initial design options for feedback (Annex C).	Email	
16 Jan 23	Reminder for feedback on initial airspace design options.	Email	



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64860 - London Heathrow Airport

Date	Summary of Engagement	Method	Remarks
21 Dec 22	Commencement of Stage 2 and initial design options for feedback (Annex C).	Email	
09 Jan 23	Request to be removed from engagement.	Email	

**From:** [REDACTED]  
**Sent:** 09 January 2023 12:52  
**To:** Airspace Change Proposal <airspacechangeproposal@bristowgroup.com>  
**Subject:** STOP

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

**NATS**

[REDACTED]  
[REDACTED]  
[REDACTED]

[REDACTED]  
[REDACTED]  
[REDACTED]

Heathrow Tower, Terminal 3  
Heathrow Airport, Middlesex UB3 5AP

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



NATS Internal





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---

**From:** Airspace Change Proposal <airspacechangeproposal@bristowgroup.com>  
**Sent:** 21 December 2022 18:05  
**To:** [REDACTED]  
**Subject:** [EXTERNAL] ACP-2021-088 - Stage 2

Mimecast Attachment Protection has deemed this file to be safe, but always exercise caution when opening files.

---

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Dear Stakeholder,

We are writing to you today to let you know that we successfully passed the Stage 1 gateway for ACP-2021-088, consequently we have progressed to Stage 2 - Develop & Assess. The initial stage (Stage - 2A) involves the development of airspace options, which are tested with you, our stakeholders.

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We look forward to your feedback and continued engagement in this process.



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Kind Regards,

### **Bristow Search & Rescue**

Dyce Avenue  
Dyce, Aberdeen  
AB21 0LQ



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60020 - London Luton

Date	Summary of Engagement	Method	Remarks
21 Dec 22	Commencement of Stage 2 and initial design options for feedback (Annex C).	Email	
16 Jan 23	Reminder for feedback on initial airspace design options.	Email	



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## 03375 - London Southend Airport

Date	Summary of Engagement	Method	Remarks
21 Dec 22	Commencement of Stage 2 and initial design options for feedback (Annex C).	Email	
21 Dec 22	Automated response.	Email	
16 Jan 23	Reminder for feedback on initial airspace design options.	Email	
16 Jan 23	Automated response.	Email	

---

**From:** [REDACTED]  
**Sent:** 16 January 2023 16:04  
**To:** Airspace Change Proposal <airspacechangeproposal@bristowgroup.com>  
**Subject:** AUTOMATED RESPONSE: LONDON SOUTHEND AIRPORT

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

Thank you for your recent enquiry, your email will be forwarded to the relevant department and we endeavour to respond within 10 working days (please note this excludes sales emails – if interested the individual will respond directly).

Please note this account is managed Monday-Friday 9-5.

Please read through the information below for information on correct links.

***This is an automated response. Please do not reply.***

---

### **Passenger Complaints and Comments:**

Following suggestions from passengers we have made changes to make it easier to give us feedback about the airport experience online. The following link will take you straight to the page where you can tell us what you enjoyed about your experience at the airport – or what you feel we can do better:

<http://www.southendairport.com/contact-us/general-enquiry/>

### **Noise Complaints:**

The following link will take you through to a page where you can register a complaint about the airport's operations, which we will investigate:







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<http://www.southendairport.com/contact-us/noise/>

Please note this new process replaces the old airport feedback system and email or telephone enquiries will be directed to this new page.

In addition, you are always free to contact us at:

Enquiries

London Southend Airport Company Ltd

Southend-on-Sea

Essex

SS2 6YF

---

#### **Cancel/Amend Pre-booked Parking**

If you wish to cancel or amend your pre-booked parking please go to: <https://prebook.southendairport.com> and click on 'manage my booking' once you have entered the details you will be able to cancel or amend the booking.

**Please note it is not possible to amend or cancel a booking within 12 hours of the arrival date and time. All amendments and cancellations must be done through the above link and cannot be processed through enquiries emails.**

---

#### **Airline/Flight Information:**

For information on flight times; arrivals, departures, delays, cancellations, etc. please go to the link below for individual airlines:

easyJet: <http://www.easyjet.com/en/flight-tracker>

Flybe: <http://www.flybe.com/cam/initialiseFlightInformation.action>

All passengers are advised to check their flight status with their airline on the day of travel if needed.

---

#### **Lost Property**

Enquiries regarding lost property can be made by following this link:

<https://www.southendairport.com/contact-us/lost-property/>

---

#### **Sales:**

Please note that all sales emails are forwarded on to the relevant departments if interested they will respond. Personal email addresses will not be given out via enquiries all sales emails are forwarded.

London Southend Airport Enquiries | London Southend Airport | Southend on Sea | Essex | SS2 6YF | UK

---

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Nothing in this email shall bind London Southend Airport Company Limited in any contract or obligation.



### LSA Enquiries

p:  
a: London Southend Airport, Southend-on-Sea, Essex. SS2 6YF  
e: [lsaenquiries@southendairport.com](mailto:lsaenquiries@southendairport.com) w:



**Best Airport With Under 3 Million Passengers AOA Awards 2019**  
**Rated Best London Airport Which? Magazine 2013-2019**

\*\*\*\*\*  
\*\*\*\*\*

This is an e-mail from **Esken Limited**.

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\*\*\*\*\*





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**From:** LSA Enquiries <LSAEnquiries@southendairport.com>  
**Sent:** 21 December 2022 18:06  
**To:** Airspace Change Proposal <airspacechangeproposal@bristowgroup.com>  
**Subject:** AUTOMATED RESPONSE: LONDON SOUTHEND AIRPORT

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---

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Enquiries

London Southend Airport Company Ltd

Southend-on-Sea

Essex

SS2 6YF

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---

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Flybe: <http://www.flybe.com/cam/initialiseFlightInformation.action>

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London Southend Airport Enquiries | London Southend Airport | Southend on Sea | Essex | SS2 6YF | UK

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### LSA Enquiries

p:  
a: London Southend Airport, Southend-on-Sea, Essex. SS2 6YF  
e: [lsaenquiries@southendairport.com](mailto:lsaenquiries@southendairport.com) w:



**Best Airport With Under 3 Million Passengers AOA Awards 2019**  
**Rated Best London Airport Which? Magazine 2013-2019**

\*\*\*\*\*

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contact the sender and then delete this email. This e-mail and/or any replies to it, together with any attachments, may be intercepted, copied or monitored by us.

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33608 - Low Fare Airlines

Date	Summary of Engagement	Method	Remarks
21 Dec 22	Commencement of Stage 2 and initial design options for feedback (Annex C).	Email	
16 Jan 23	Reminder for feedback on initial airspace design options.	Email	



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87687 - Lowden Airstrip: Thorson Estates

Date	Summary of Engagement	Method	Remarks
21 Dec 22	Commencement of Stage 2 and initial design options for feedback (Annex C).	Email	
16 Jan 23	Reminder for feedback on initial airspace design options.	Email	





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67458 - Lukesfield Airfield

Date	Summary of Engagement	Method	Remarks
21 Dec 22	Commencement of Stage 2 and initial design options for feedback (Annex C).	Email	
16 Jan 23	Reminder for feedback on initial airspace design options.	Email	



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36789 - Lydd Aero Club

Date	Summary of Engagement	Method	Remarks
21 Dec 22	Commencement of Stage 2 and initial design options for feedback (Annex C).	Email	
16 Jan 23	Reminder for feedback on initial airspace design options.	Email	



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15662 - Lydd London Ashford Airport

Date	Summary of Engagement	Method	Remarks
21 Dec 22	Commencement of Stage 2 and initial design options for feedback (Annex C).	Email	
23 Jan 23	Feedback on initial airspace options.	Email	
26 Jan 23	Thank you for feedback.	Email	

---

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

**Sent:** 26 January 2023 13:11

**To:** [REDACTED]

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

**Subject:** Re: ACP-2021-088 - Stage 2

Good Afternoon [REDACTED],

Thank you for the feedback.

Best Regards,

[REDACTED]

---

**From:** [REDACTED]

**Sent:** 23 January 2023 17:03

**To:** [REDACTED]

[REDACTED]

**Subject:** RE: ACP-2021-088 - Stage 2

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---

Hi [REDACTED]

Thank you for the information.





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I agree with the SWOT analysis on the options.

**Option 0 do nothing** – does not resolve the issue. Disregard.

**Option 1A** - is similar to the current operating status of the TDA

**Option 1B** - is an improvement on 1A and would facilitate flexible use of airspace potentially permitting crossing of inactive sectors of the DA whilst not impacting upon the UAS tasking. This would be Lydd's favoured option. I would suggest deleting UAS transit corridors A and C and then create 4 more or less equal sectors within the 1500ft section to facilitate DAAIS/ DACS.

**Option 2** - Whilst attempting to address the issue of exclusion by introducing the GA corridors, the latter create new hazards such as funneling of traffic, proximity to obstacles [Hougham mast] and additional flight track distance whilst the DA ceiling height is raised further to 2500ft. This option is best avoided.

Summary – our preferred option is 1B. This aligns most closely to the design options and is achievable without introducing new hazards. Some minor modifications to DA airspace management would facilitate GA crossings when needed.

Many thanks

Best regards

[Redacted signature block]

---

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

**Sent:** 21 December 2022 18:07

**To:** [Redacted]

**Subject:** ACP-2021-088 - Stage 2

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Dear [REDACTED],

We are writing to you today to let you know that we successfully passed the Stage 1 gateway for ACP-2021-088, consequently we have progressed to Stage 2 - Develop & Assess. The initial stage (Stage - 2A) involves the development of airspace options, which are tested with you, our stakeholders.

Consequently, several options have been developed, and we would like to preliminarily test these options with you to ensure that you are satisfied that the design options align with the design principles and that we as the change sponsor have understood and accounted for your concerns within the design options. These options are set out within the attached presentation and PDF.

We would welcome your feedback on each of the design options and have included a feedback form to aid this, though we are happy to receive feedback in any appropriate formats. Any feedback needs to be returned to us at [airspacechangeproposal@bhlgroupp.com](mailto:airspacechangeproposal@bhlgroupp.com) by the 30 January 2023.

Further details of the proposal can be found at [Airspace change portal \(caa.co.uk\)](https://www.caa.co.uk/airspace-change), then selecting 'search by Airspace Change ID' and entering ACP reference ACP-2021-088.

Guidance relating to the Airspace Change Proposal and the process we are required to follow by the CAA can be found at <https://airspacechange.caa.co.uk/about-airspace-change/> and specifically CAP1616.

If you no longer wish to be included in further communications regarding this ACP, please reply to this email with 'STOP' in the subject and you will be removed from the stakeholder list.

We look forward to your feedback and continued engagement in this process.

Kind Regards,

**Bristow Search & Rescue**

Dyce Avenue  
Dyce, Aberdeen  
AB21 0LQ



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96884 - Manston International Airport

Date	Summary of Engagement	Method	Remarks
21 Dec 22	Commencement of Stage 2 and initial design options for feedback (Annex C).	Email	
16 Jan 23	Reminder for feedback on initial airspace design options.	Email	



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95247 - Maritime and Coastguard Agency (MCA)

Date	Summary of Engagement	Method	Remarks
21 Dec 22	Commencement of Stage 2 and initial design options for feedback (Annex C).	Email	
27 Jan 23	Feedback on initial airspace design options.	Email	
27 Jan 23	Thank you for feedback.	Email	

---

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

**Sent:** 27 January 2023 14:00

**To:** [REDACTED]

**Subject:** Re: ACP-2021-088 - Stage 2

Good Afternoon [REDACTED],

Thank you for the feedback, nothing else required at this stage.

Best Regards,

[REDACTED]

---

**From:** [REDACTED]

**Sent:** 27 January 2023 11:41

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

**Subject:** RE: ACP-2021-088 - Stage 2

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

Good morning [REDACTED],

Please find attached response from HM Coastguard.

[REDACTED]





Regards



Design Option 1A – Stakeholder feedback

Item	Question	Feedback
1	Do you agree with the initial assessment against the agreed Design Principles? If not please provide details?	Yes
2	How would this option impact you?	Addition of DAAIS will have little impact due to the nature of our requirement to use the airspace.
3	Do you have any alternative airspace construct suggestions that will meet the statement of need and align with Design Principles?	No
4	Do you have any alternative airspace management suggestions that can be considered that will meet the statement of need and Design Principles?	No
5	Free Text -HM Coastguard have processes in place for our SAR helicopters to enter the TDA complex <u>in order to</u> respond to a distress phase incident, and so the introduction of a DAAIS will not add any additional benefits.	



Design Option 1 B – Stakeholder Feedback ¶

Item ¶	Question ¶	Feedback ¶
1 ¶	Do you agree with the initial assessment against the agreed Design Principles? If not please provide details? ¶	<u>Yes and this option is the preferred solution</u> ¶
2 ¶	How would this option impact you? ¶	The addition of a DAAIS and DACS will enhance the safety of all airspace users and provide the general aviation users to access the DA utilising the proposed ATS. ¶
3 ¶	Do you have any alternative airspace construct suggestions that will meet the statement of need and align with Design Principles? ¶	No ¶
4 ¶	Do you have any alternative airspace management suggestions that can be considered that will meet the statement of need and Design Principles? ¶	No ¶
5 ¶	Free Text This is HM Coastguard’s preferred solution, which allows for enhanced safety for airspace users and also provides a method for GA users to cross the English Channel when the DA is active. ¶	¶



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Design Option 2 – Stakeholder feedback

Item	Question	Feedback
1	Do you agree with the initial assessment against the agreed Design Principles? If not please provide details?	Yes
2	How would this option impact you?	Given the nature of our requirement to use the airspace to respond to small boat incidents in the distress phase, the suggested corridors may impact on the SAR Helicopter to achieve a rescue and add a requirement for the JRCC-AR to implement a TDA across the corridors.
3	Do you have any alternative airspace construct suggestions that will meet the statement of need and align with Design Principles?	No
4	Do you have any alternative airspace management suggestions that can be considered that will meet the statement of need and Design Principles?	No
5	Free Text: Whilst this option provides increased GA traffic the ability to cross the English Channel, for HM Coastguard, this would add a requirement to create a TDA in the corridor should a distress phase SAR incident occur within one of the corridors. We agree with the initial assessment that this solution would be likely to REDUCE safety, due to the potential funnelling of GA traffic through the proposed corridors.	

**From:** Airspace Change Proposal <airspacechangeproposal@bristowgroup.com>  
**Sent:** 21 December 2022 21:00  
**To:** [REDACTED]; Airspace Change Proposal <airspacechangeproposal@bristowgroup.com>  
**Subject:** ACP-2021-088 - Stage 2

**CAUTION:** This email originated from outside the UK Government. Do not click links or open attachments unless you recognise the sender and know the content is safe. Please use the Report Message function to report suspicious messages.

We are writing to you today to let you know that we successfully passed the Stage 1 gateway for ACP-2021-088, consequently we have progressed to Stage 2 - Develop & Assess. The initial





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stage (Stage - 2A) involves the development of airspace options, which are tested with you, our stakeholders.

Consequently, several options have been developed, and we would like to preliminarily test these options with you to ensure that you are satisfied that the design options align with the design principles and that we as the change sponsor have understood and accounted for your concerns within the design options. These options are set out within the attached presentation and PDF.

We would welcome your feedback on each of the design options and have included a feedback form to aid this, though we are happy to receive feedback in any appropriate formats. Any feedback needs to be returned to us at [airspacechangeproposal@bhigroup.com](mailto:airspacechangeproposal@bhigroup.com) by the 30 January 2023.

Further details of the proposal can be found at [Airspace change portal \(caa.co.uk\)](https://airspacechangeportal.caa.co.uk), then selecting 'search by Airspace Change ID' and entering ACP reference ACP-2021-088.

Guidance relating to the Airspace Change Proposal and the process we are required to follow by the CAA can be found at <https://airspacechange.caa.co.uk/about-airspace-change/> and specifically CAP1616.

If you no longer wish to be included in further communications regarding this ACP, please reply to this email with 'STOP' in the subject and you will be removed from the stakeholder list.

We look forward to your feedback and continued engagement in this process.

Kind Regards,

[Redacted signature]

**Bristow Search & Rescue**

Dyce Avenue  
Dyce, Aberdeen  
AB21 0LQ



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67878 - [REDACTED]

Date	Summary of Engagement	Method	Remarks
21 Dec 22	Commencement of Stage 2 and initial design options for feedback (Annex C).	Email	
16 Jan 23	Reminder for feedback on initial airspace design options.	Email	
26 Jan 23	Feedback provided on initial airspace options.	Email	

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

**Sent:** 26 January 2023 13:46

**To:** [REDACTED]

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

**Subject:** Re: ACP-2021-088 - Stage 2

Good Morning [REDACTED]

Thank you for taking the time to provide detailed feedback. We have provided responses to the points raised and some of your questions below where appropriate:

*1 Do you agree with the initial assessment against the agreed Design Principles? If not please provide details?*

The original design principles are flawed.

Bristow's appear to have approached every commercial air transport organisation in the UK.

However they only appear to have contacted GA operations within 20 miles or so of Dover.

As many GA pilots within the UK and also the near continent use this busy piece of airspace, why were they not contacted as potential stake holders?

There seems to be no mention of how 'non-radio' traffic will be handled.



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Response: The engagement strategy and rationale was considered, proposed and approved by the CAA at the Stage 1 gateway. As part of the Engagement on the Design Principles, we followed the approved strategy and sought feedback from a wide variety of associations that represent the GA community, local airfields, a range of clubs, associations and aviation media. Documentation to support this can be found on the CAA airspace change portal - [Airspace change portal \(caa.co.uk\)](https://www.caa.co.uk/airspace-change-portal), then selecting 'search by Airspace Change ID' and entering ACP reference ACP-2021-088.

## *2 How would this option impact you?*

Will prevent me flying VMC when cloudbase is below 1800 feet amsl.

## *3 Do you have any alternative airspace construct suggestions that will meet the statement of need and align with Design Principles?*

Yes, reduce the airspace ceiling to below 1000 feet amsl in line with other UAS operations within the UK.

Response: One of the several UAS being operated (Schiebel S-100) is unable to be operated at the ranges commensurate with the proposed segregated airspace volume at altitudes of less than 1500ft. This is due to the communications link being radio line of sight, which to be maintained requires the UAS to increase its altitude the further away from the control station the aircraft is. This is why the current TDA altitude ceilings exist at their current levels, and why the proposed Danger Area ceilings are set at the same level. It is a technical limitation of the system.

## *4 Do you have any alternative airspace management suggestions that can be considered that will meet the statement of need and Design Principles?*

A mandated crossing service provided by Bristows.

## *5 Free Text*



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Response: Thank you, Option 1b includes a DAAIS and DACS.

This document has been constructed for the MCA by Bristow Helicopters, if I understand correctly.

Bristow are a commercial IFR operation and I suspect have little or no interest or knowledge in GA VFR operations, hence someone in this professional organisation consistently refers to “*at altitudes less than 1500ft i.e. under visual flight rules where **visibility** is reduced below 1500ft.*” I was unaware that we measure visibility in feet?

Response: We could have been clearer here, as the intention was for this to mean; where visibility is restricted at altitudes below 1500ft, and hence VFR are required for non IFR capable operators.

The only option on offer that is acceptable is 1B.

Response: Understood.

Option 2 is dangerous.

Response: Understood.

The document seems to go into great detail of the movements etc from Lydd. I was unaware that Lydd was the designated service for the Channel crossing service. There seems to be no mention of the movements recorded by London Information or any other service provided to cross the Channel, why not?

Basing this ACP on the movements recorded by Lydd does not represent movements in the airspace under consideration.

Has any other research been requested/actioned to gather a complete picture of the movements in airspace affected? If not why not?

Response: Research is ongoing with regard to the traffic affected by this ACP, as it is acknowledged that the information from Lydd only provides a partial picture. The intention is to have this information as part of Stage 2B and onwards.







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*1 Do you agree with the initial assessment against the agreed Design Principles? If not please provide details?*

The original design principles are flawed.

Bristow's appear to have approached every commercial air transport organisation in the UK.

However they only appear to have contacted GA operations within 20 miles or so of Dover.

As many GA pilots within the UK and also the near continent use this busy piece of airspace, why were they not contacted as potential stake holders?

There seems to be no mention of how 'non-radio' traffic will be handled.

*2 How would this option impact you?*

Will prevent me flying VMC when cloudbase is below 1800 feet amsl.

*3 Do you have any alternative airspace construct suggestions that will meet the statement of need and align with Design Principles?*

Yes, reduce the airspace ceiling to below 1000 feet amsl in line with other UAS operations within the UK.

*4 Do you have any alternative airspace management suggestions that can be considered that will meet the statement of need and Design Principles?*

A mandated crossing service provided by Bristows.

*5 Free Text*

This document has been constructed for the MCA by Bristow Helicopters, if I understand correctly.



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Bristow are a commercial IFR operation and I suspect have little or no interest or knowledge in GA VFR operations, hence someone in this professional organisation consistently refers to “*at altitudes less than 1500ft i.e. under visual flight rules where visibility is reduced below 1500ft.*” I was unaware that we measure visibility in feet?

The only option on offer that is acceptable is 1B.

Option 2 is dangerous.

The document seems to go into great detail of the movements etc from Lydd. I was unaware that Lydd was the designated service for the Channel crossing service. There seems to be no mention of the movements recorded by London Information or any other service provided to cross the Channel, why not?

Basing this ACP on the movements recorded by Lydd does not represent movements in the airspace under consideration.

Has any other research been requested/actioned to gather a complete picture of the movements in airspace affected? If not why not?

*“General Aviation traffic would most likely route directly from their point of departure to their point of destination, using either VFR or IFR methods dependent on prevailing conditions and their operating approvals.”*

You are confusing the issue here, IFR traffic has little or no relevance to this ACP. Please can you supply the evidence for the statement.

Most pilots to my knowledge will fly the shortest sea crossing available.



39283 - Ministry of Defence - Defence Airspace and Air Traffic Management (MoD DAATM)

Date	Summary of Engagement	Method	Remarks
21 Dec 22	Commencement of Stage 2 and initial design options for feedback (Annex C).	Email	
16 Jan 23	Reminder for feedback on initial airspace design options.	Email	
24 Jan 23	Feedback on initial airspace design options.	Email	
26 Jan 23	Thank you, and query regarding views from USAFE.	Email	
26 Jan 23	Response to query.	Email	
26 Jan 23	Thank you for query response.	Email	

---

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

**Sent:** 26 January 2023 13:37

**To:** [REDACTED]

**Subject:** Re: ACP-2021-088 - Stage 2

Thank you [REDACTED], will do.

---

**From:** [REDACTED]

**Sent:** 26 January 2023 13:35

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

**Subject:** RE: ACP-2021-088 - Stage 2

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

Hi [REDACTED],



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DAATM goes through the [REDACTED], sometimes we get responses and sometimes we don't. I suggest that you continue to use your POC and I will discuss how they would prefer to be engaged as a stakeholder in my meeting with them next week.

Best regards,

[REDACTED]

[REDACTED]

---

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

**Sent:** 26 January 2023 13:29

**To:** [REDACTED]

**Subject:** Re: ACP-2021-088 - Stage 2

Good Afternoon [REDACTED],

Thank you for your feedback, all very clear.

One quick question we see that DAATM have provided feedback on behalf of USAFE, will this always be the case? As we currently send information directly to [REDACTED] and want to check if this is appropriate or if it is more appropriate through DAATM?

Best Regards,

[REDACTED]

---

**From:** [REDACTED]

**Sent:** 24 January 2023 10:30

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

**Subject:** RE: ACP-2021-088 - Stage 2

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

Good morning,





Please see collated responses from MOD airspace users, in relation to Stage 2A of ACP-2021-088:

**Option 1A**

Item	Question	Feedback
1	Do you agree with the initial assessment against the agreed Design Principles? If not please provide details?	Yes
2	How would this option impact you?	Reduction of airspace available for low-flying through the area – used by USAFE. Service occasionally provided to aircraft by D&D and it could make transits of emergency aircraft more taxing as the airspace would have to be avoided.  Lack of a method for crossing would potentially impact Air Policing if they needed to route through there on a sortie.
3	Do you have any alternative airspace construct suggestions that will meet the statement of need and align with Design Principles?	No
4	Do you have any alternative airspace management suggestions that can be considered that will meet the statement of need and Design Principles?	Provision of a DACS would be beneficial (covered by option 1B).
5	Free Text	Clear cut, formalised, activation and deactivation procedures are essential for MOD to be able to ensure aircraft remain outside the area when active.  Viewed by MOD as the most restrictive of the 3 options.

**Option 1B**

Item	Question	Feedback
1	Do you agree with the initial assessment against the agreed Design Principles? If not please provide details?	Yes
2	How would this option impact you?	Little to no impact if DACS available throughout active periods. If DACS is time limited or unavailable then impact as per option 1A.



3	Do you have any alternative airspace construct suggestions that will meet the statement of need and align with Design Principles?	No
4	Do you have any alternative airspace management suggestions that can be considered that will meet the statement of need and Design Principles?	No.
5	Free Text	Clear cut, formalised, activation and deactivation procedures are essential for MOD to be able to ensure aircraft remain outside the area when active.  Preferred option for MOD due to the DACS provision.

**Option 2**

Item	Question	Feedback
1	Do you agree with the initial assessment against the agreed Design Principles? If not please provide details?	Yes
2	How would this option impact you?	Less impact than option 1A but not as flexible as option 1B. The fixed nature of the corridors would leave little flexibility for aircraft that desire to cross. Impact would be the same for USAFE aircraft and Air Policing assets, which would be highly unlikely to want to use the corridors.
3	Do you have any alternative airspace construct suggestions that will meet the statement of need and align with Design Principles?	Additional corridor(s) that run East-West and West-East.
4	Do you have any alternative airspace management suggestions that can be considered that will meet the statement of need and Design Principles?	DACS provision for aircraft that can't comply with the corridor routes.
5	Free Text	Clear cut, formalised, activation and deactivation procedures are essential for MOD to be able to ensure aircraft remain outside the area when active.  Viewed by MOD as being the second best option, depending on the exact location of the corridors. Location of corridors could be explored with airspace users to offer the best crossing points for aircraft and to reduce funnelling effect.



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If you require clarification of any of the above points, please feel free to respond directly.

Best regards,

[Redacted]

[Redacted]

---

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

**Sent:** 16 January 2023 16:40

**To:** [Redacted]

**Subject:** Re: ACP-2021-088 - Stage 2

Dear Stakeholder,

We recently emailed to invite opinions on the initial airspace options of our airspace change proposal, and wanted to provide a reminder in case you or your organisation want to provide feedback. If you can send any feedback by the 30 January 23 to [airspacechangeproposal@bristowgroup.com](mailto:airspacechangeproposal@bristowgroup.com) we would be grateful.

In case you missed our previous email, we have appended it below with the details and the accompanying documents are attached.

If you no longer wish to be included in further communications regarding this ACP, please reply to this email with 'STOP' in the subject and you will be removed from the stakeholder list.

Kind Regards,

**Bristow Search & Rescue**

Dyce Avenue  
Dyce, Aberdeen  
AB21 0LQ







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---

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

**Sent:** 21 December 2022 18:08

**To:** [REDACTED]

**Subject:** ACP-2021-088 - Stage 2

Dear Stakeholder,

We are writing to you today to let you know that we successfully passed the Stage 1 gateway for ACP-2021-088, consequently we have progressed to Stage 2 - Develop & Assess. The initial stage (Stage - 2A) involves the development of airspace options, which are tested with you, our stakeholders.

Consequently, several options have been developed, and we would like to preliminarily test these options with you to ensure that you are satisfied that the design options align with the design principles and that we as the change sponsor have understood and accounted for your concerns within the design options. These options are set out within the attached presentation and PDF.

We would welcome your feedback on each of the design options and have included a feedback form to aid this, though we are happy to receive feedback in any appropriate formats. Any feedback needs to be returned to us at [airspacechangeproposal@bhigroup.com](mailto:airspacechangeproposal@bhigroup.com) by the 30 January 2023.

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If you no longer wish to be included in further communications regarding this ACP, please reply to this email with 'STOP' in the subject and you will be removed from the stakeholder list.

We look forward to your feedback and continued engagement in this process.

Kind Regards,





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Coastguard  
Agency



**Bristow Search & Rescue**

Dyce Avenue  
Dyce, Aberdeen  
AB21 0LQ



*Global Leader in Vertical Flight*

---

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

**Sent:** 21 December 2022 18:08

**To:** [REDACTED]

**Subject:** ACP-2021-088 - Stage 2

Dear Stakeholder,

We are writing to you today to let you know that we successfully passed the Stage 1 gateway for ACP-2021-088, consequently we have progressed to Stage 2 - Develop & Assess. The initial stage (Stage - 2A) involves the development of airspace options, which are tested with you, our stakeholders.

Consequently, several options have been developed, and we would like to preliminarily test these options with you to ensure that you are satisfied that the design options align with the design principles and that we as the change sponsor have understood and accounted for your concerns within the design options. These options are set out within the attached presentation and PDF.

We would welcome your feedback on each of the design options and have included a feedback form to aid this, though we are happy to receive feedback in any appropriate formats. Any feedback needs to be returned to us at [airspacechangeproposal@bhlgroup.com](mailto:airspacechangeproposal@bhlgroup.com) by the 30 January 2023.

Further details of the proposal can be found at [Airspace change portal \(caa.co.uk\)](https://airspacechangeportal.caa.co.uk), then selecting 'search by Airspace Change ID' and entering ACP reference ACP-2021-088.

Guidance relating to the Airspace Change Proposal and the process we are required to follow by the CAA can be found at <https://airspacechange.caa.co.uk/about-airspace-change/> and specifically CAP1616.



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If you no longer wish to be included in further communications regarding this ACP, please reply to this email with 'STOP' in the subject and you will be removed from the stakeholder list.

We look forward to your feedback and continued engagement in this process.

Kind Regards,

**Bristow Search & Rescue**

Dyce Avenue  
Dyce, Aberdeen  
AB21 0LQ



*Global Leader in Vertical Flight*

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---

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

**Sent:** 21 December 2022 18:08

**To:** [REDACTED]

**Subject:** ACP-2021-088 - Stage 2

Dear Stakeholder,

We are writing to you today to let you know that we successfully passed the Stage 1 gateway for ACP-2021-088, consequently we have progressed to Stage 2 - Develop & Assess. The initial stage (Stage - 2A) involves the development of airspace options, which are tested with you, our stakeholders.

Consequently, several options have been developed, and we would like to preliminarily test these options with you to ensure that you are satisfied that the design options align with the design





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principles and that we as the change sponsor have understood and accounted for your concerns within the design options. These options are set out within the attached presentation and PDF.

We would welcome your feedback on each of the design options and have included a feedback form to aid this, though we are happy to receive feedback in any appropriate formats. Any feedback needs to be returned to us at [airspacechangeproposal@bhlgroupp.com](mailto:airspacechangeproposal@bhlgroupp.com) by the 30 January 2023.

Further details of the proposal can be found at [Airspace change portal \(caa.co.uk\)](https://airspacechangeportal.caa.co.uk), then selecting 'search by Airspace Change ID' and entering ACP reference ACP-2021-088.

Guidance relating to the Airspace Change Proposal and the process we are required to follow by the CAA can be found at <https://airspacechange.caa.co.uk/about-airspace-change/> and specifically CAP1616.

If you no longer wish to be included in further communications regarding this ACP, please reply to this email with 'STOP' in the subject and you will be removed from the stakeholder list.

We look forward to your feedback and continued engagement in this process.

Kind Regards,

**Bristow Search & Rescue**

Dyce Avenue  
Dyce, Aberdeen  
AB21 0LQ



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45375 - Ministry of Defence - Royal Navy Command HQ

Date	Summary of Engagement	Method	Remarks
21 Dec 22	Commencement of Stage 2 and initial design options for feedback (Annex C).	Email	
16 Jan 23	Reminder for feedback on initial airspace design options.	Email	
17 Jan 23	Request to change contact details.	Email	
19 Jan 23	Response confirming details have been changed.	Email	
21 Jan 23	Correspondence to say feedback has been provided to DAATM.	Email	
23 Jan 23	Thank you for providing feedback through DAATM.	Email	

---

**From:** Airspace Change Proposal <airspacechangeproposal@bristowgroup.com>  
**Sent:** 23 January 2023 10:14  
**To:** [REDACTED]  
**Subject:** Re: ACP-2021-088 - Stage 2

Hi [REDACTED],

Thank you, yes that will do nicely.

Best Regards,

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 21 January 2023 13:31



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**To:** Airspace Change Proposal <airspacechangeproposal@bristowgroup.com>  
**Subject:** RE: ACP-2021-088 - Stage 2

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---

Good afternoon [REDACTED],

I have submitted the RN feedback via [REDACTED]. I hope that suffices.

If you need anything else, please let me know.

KR,

[REDACTED]

[REDACTED]  
[REDACTED]  
[REDACTED]

---

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

**Sent:** 19 January 2023 11:56

**To:** [REDACTED]  
[REDACTED]

**Subject:** Re: ACP-2021-088 - Stage 2

Good Morning [REDACTED],

Thank you for your email, we will direct future communications to [REDACTED]

[REDACTED]

I assume you have access to all the material regarding this Airspace Change Proposal, but if you need anything please get in touch.

Best Regards,

[REDACTED]

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**From:** [REDACTED]  
**Sent:** 17 January 2023 07:38  
**To:** Airspace Change Proposal <airspacechangeproposal@bristowgroup.com>  
**Cc:** [REDACTED]  
**Subject:** RE: ACP-2021-088 - Stage 2

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Hello [REDACTED],

I have now handed over the role of [REDACTED] and who is now the POC for all ACPs within Navy Command Headquarters. Could you direct all future correspondence to Trish please.

Kind regards,

[REDACTED]

[REDACTED]

---

**From:** Airspace Change Proposal <airspacechangeproposal@bristowgroup.com>  
**Sent:** 16 January 2023 16:42  
**To:** [REDACTED]  
**Subject:** Re: ACP-2021-088 - Stage 2

Dear Stakeholder,

We recently emailed to invite opinions on the initial airspace options of our airspace change proposal, and wanted to provide a reminder in case you or your organisation want to provide feedback. If you can send any feedback by the 30 January 23 to [airspacechangeproposal@bristowgroup.com](mailto:airspacechangeproposal@bristowgroup.com) we would be grateful.

In case you missed our previous email, we have appended it below with the details and the accompanying documents are attached.





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If you no longer wish to be included in further communications regarding this ACP, please reply to this email with 'STOP' in the subject and you will be removed from the stakeholder list.

Kind Regards,

### **Bristow Search & Rescue**

Dyce Avenue

Dyce, Aberdeen

AB21 0LQ



*Global Leader in Vertical Flight*

---

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

**Sent:** 21 December 2022 18:08

**To:** [REDACTED]

**Subject:** ACP-2021-088 - Stage 2

Dear Stakeholder,

We are writing to you today to let you know that we successfully passed the Stage 1 gateway for ACP-2021-088, consequently we have progressed to Stage 2 - Develop & Assess. The initial stage (Stage - 2A) involves the development of airspace options, which are tested with you, our stakeholders.

Consequently, several options have been developed, and we would like to preliminarily test these options with you to ensure that you are satisfied that the design options align with the design principles and that we as the change sponsor have understood and accounted for your concerns within the design options. These options are set out within the attached presentation and PDF.

We would welcome your feedback on each of the design options and have included a feedback form to aid this, though we are happy to receive feedback in any appropriate formats. Any





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feedback needs to be returned to us at [airspacechangeproposal@bhlgrou.com](mailto:airspacechangeproposal@bhlgrou.com) by the 30 January 2023.

Further details of the proposal can be found at [Airspace change portal \(caa.co.uk\)](https://airspacechangeportal.caa.co.uk), then selecting 'search by Airspace Change ID' and entering ACP reference ACP-2021-088.

Guidance relating to the Airspace Change Proposal and the process we are required to follow by the CAA can be found at <https://airspacechange.caa.co.uk/about-airspace-change/> and specifically CAP1616.

If you no longer wish to be included in further communications regarding this ACP, please reply to this email with 'STOP' in the subject and you will be removed from the stakeholder list.

We look forward to your feedback and continued engagement in this process.

Kind Regards,

#### **Bristow Search & Rescue**

Dyce Avenue  
Dyce, Aberdeen  
AB21 0LQ



*Global Leader in Vertical Flight*

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11884 - MP for Folkestone and Hythe

Date	Summary of Engagement	Method	Remarks
21 Dec 22	Commencement of Stage 2 and initial design options for feedback (Annex C).	Email	
16 Jan 23	Reminder for feedback on initial airspace design options.	Email	



56886 - National Air Traffic Service (NATS)

Date	Summary of Engagement	Method	Remarks
21 Dec 22	Commencement of Stage 2 and initial design options for feedback (Annex C).	Email	
16 Jan 23	Reminder for feedback on initial airspace design options.	Email	
31 Jan 23	Feedback on initial airspace options.	Email	
1 Feb 23	Response to feedback.	Email	

---

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

**Sent:** 01 February 2023 10:45

**To:** [REDACTED]

[REDACTED]

**Subject:** Re: ACP-2021-088 - Stage 2

Good Morning [REDACTED]

Thank you for your feedback. Regarding the DACS provider, we are exploring a number of options of which Lydd is one, and we will keep you informed as conversations develop.

Best Regards,

[REDACTED]

---

**From:** [REDACTED]

**Sent:** 31 January 2023 17:31

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

[REDACTED]

**Subject:** RE: ACP-2021-088 - Stage 2

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If you no longer wish to be included in further communications regarding this ACP, please reply to this email with 'STOP' in the subject and you will be removed from the stakeholder list.

Kind Regards,

### **Bristow Search & Rescue**

Dyce Avenue  
Dyce, Aberdeen  
AB21 0LQ



*Global Leader in Vertical Flight*

---

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

**Sent:** 21 December 2022 18:09

**To:** [REDACTED]

**Subject:** ACP-2021-088 - Stage 2

Dear Stakeholder,

We are writing to you today to let you know that we successfully passed the Stage 1 gateway for ACP-2021-088, consequently we have progressed to Stage 2 - Develop & Assess. The initial stage (Stage - 2A) involves the development of airspace options, which are tested with you, our stakeholders.

Consequently, several options have been developed, and we would like to preliminarily test these options with you to ensure that you are satisfied that the design options align with the design principles and that we as the change sponsor have understood and accounted for your concerns within the design options. These options are set out within the attached presentation and PDF.

We would welcome your feedback on each of the design options and have included a feedback form to aid this, though we are happy to receive feedback in any appropriate formats. Any feedback needs to be returned to us at [airspacechangeproposal@bhlgroup.com](mailto:airspacechangeproposal@bhlgroup.com) by the 30 January 2023.



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Further details of the proposal can be found at [Airspace change portal \(caa.co.uk\)](https://www.caa.co.uk/air-space-change-portal), then selecting 'search by Airspace Change ID' and entering ACP reference ACP-2021-088.

Guidance relating to the Airspace Change Proposal and the process we are required to follow by the CAA can be found at <https://airspacechange.caa.co.uk/about-airspace-change/> and specifically CAP1616.

If you no longer wish to be included in further communications regarding this ACP, please reply to this email with 'STOP' in the subject and you will be removed from the stakeholder list.

We look forward to your feedback and continued engagement in this process.

Kind Regards,

**Bristow Search & Rescue**

Dyce Avenue  
Dyce, Aberdeen  
AB21 0LQ



*Global Leader in Vertical Flight*

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98764 - National Police Air Service

Date	Summary of Engagement	Method	Remarks
21 Dec 22	Commencement of Stage 2 and initial design options for feedback (Annex C).	Email	
16 Jan 23	Reminder for feedback on initial airspace design options.	Email	





89876 - National Trust

Date	Summary of Engagement	Method	Remarks
21 Dec 22	Commencement of Stage 2 and initial design options for feedback (Annex C).	Email	
21 Dec 22	Out of Office response.	Email	
16 Jan 23	Reminder for feedback on initial airspace design options.	Email	
17 Jan 23	Feedback provided on initial airspace options.	Email	
19 Jan 23	Follow up regarding concerns related to Option 2.	Email	
19 Jan 23	Feedback regarding possible amendment to Option 2.	Email	
19 Jan 23	Thank you for the additional feedback.	Email	

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

**Sent:** 19 January 2023 16:04

**To:** [REDACTED]

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

**Subject:** Re: ACP-2021-088 - Stage 2

Good Afternoon [REDACTED]

Thank you for the detailed feedback, we will include this in the continued development of the airspace options.

I would highlight that this is just one of several options that are being developed and we will continue to engage as these mature, in line with stakeholder view.

Kind Regards,





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**Bristow**  
Search and Rescue



Kind regards,

[Redacted signature]



National  
Trust

[Redacted contact information]

*My working days are Tuesday, Wednesday and Thursday*



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**From:** Airspace Change Proposal <airspacechangeproposal@bristowgroup.com>  
**Sent:** 19 January 2023 13:55  
**To:** [REDACTED]  
**Subject:** Re: ACP-2021-088 - Stage 2

Good Afternoon [REDACTED],

Thank you for the feedback of particular interest was the concerns regarding option 2.

A number of stakeholders have requested variations to Option 2, where by the transit corridors are over the shortest route between the UK and France. I have attached an initial sketch on what this might look like, but following your concerns regarding option, do these remain if the transit corridors are across the shortest route across the channel?

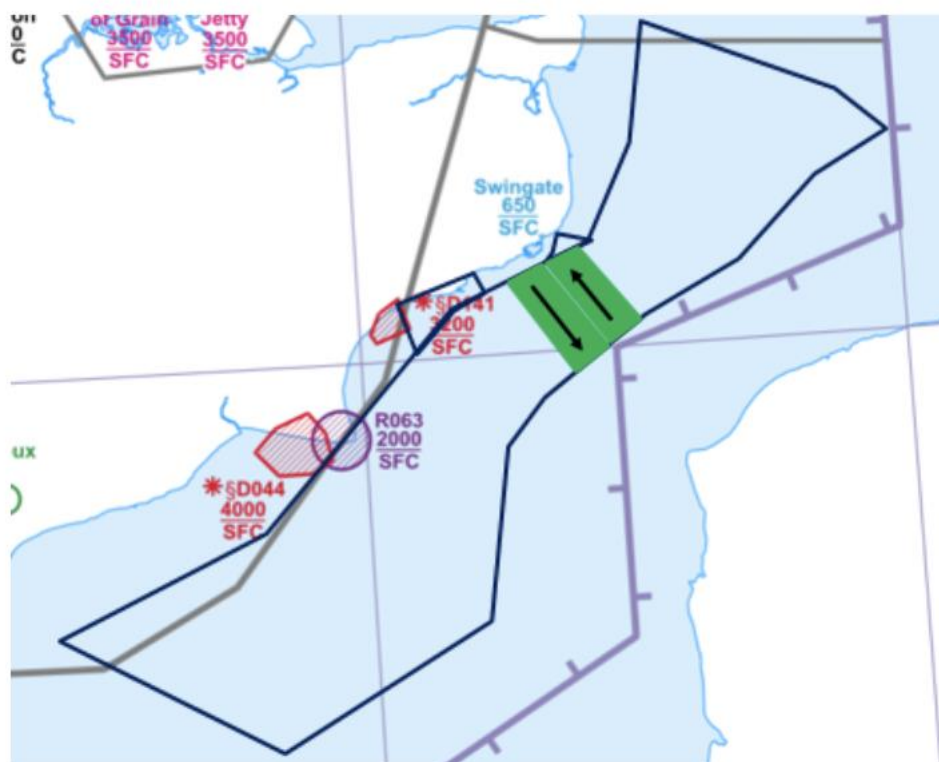
Look forward to receiving your thoughts.

Best Regards,

[REDACTED]



## Design Option 2 – Airspace Representation



- Two one way corridors within Danger Area complex to allow routing across – Green.
- DA complex of D098 D and C ceiling increased to 2500ft to enable corridor from SFC to 1500ft.
- Doesn't interfere with CTAs.



From: [REDACTED]  
Sent: 17 January 2023 09:50  
To: Airspace Change Proposal <airspacechangeproposal@bristowgroup.com>  
Cc: [REDACTED]

Subject: RE: ACP-2021-088 - Stage 2

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Dear Bristow Search and Rescue,

Please find attached the feedback from The National Trust in response to the Stage 2A consultation.

Kind regards,

[Redacted signature]



National  
Trust

[Redacted contact information]

*My working days are Tuesday, Wednesday and Thursday*



## Design Option 1A – Stakeholder Feedback

**We are looking for feedback and wish to understand how this option may impact you.**

Item	Question	Feedback
1	Do you agree with the initial assessment against the agreed Design Principles? If not please provide details?	The National Trust is content with the initial assessment against the agreed Design Principles.
2	How would this option impact you?	This option is unlikely to impact adversely on National Trust interests along the English Channel coast.
3	Do you have any alternative airspace construct suggestions that will meet the statement of need and align with Design Principles?	The Trust does not have any alternative airspace construct suggestions.
4	Do you have any alternative airspace management suggestions that can be considered that will meet the statement of need and Design Principles?	The Trust does not have any alternative airspace management suggestions.
5	Free Text	No further comments.



## Design Option 1B – Stakeholder Feedback

**We are looking for feedback and wish to understand how this option may impact you.**

Item	Question	Feedback
1	Do you agree with the initial assessment against the agreed Design Principles? If not please provide details?	The National Trust is content with the initial assessment against the agreed Design Principles.
2	How would this option impact you?	This option is unlikely to impact adversely on National Trust interests along the English Channel coast.
3	Do you have any alternative airspace construct suggestions that will meet the statement of need and align with Design Principles?	The Trust does not have any alternative airspace construct suggestions.
4	Do you have any alternative airspace management suggestions that can be considered that will meet the statement of need and Design Principles?	The Trust does not have any alternative airspace management suggestions.
5	Free Text	No further comments.





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## Design Option 2 – Stakeholder Feedback

**We are looking for feedback and wish to understand how this option may impact you.**

Item	Question	Feedback
1	Do you agree with the initial assessment against the agreed Design Principles? If not please provide details?	The National Trust is content with the initial assessment against the agreed Design Principles.
2	How would this option impact you?	Whilst UAS operations are unlikely to impact adversely on National Trust interests the Trust is concerned about the potential noise impact on White Cliffs and Farthingloe arising from aircraft using the outbound access corridor.
3	Do you have any alternative airspace construct suggestions that will meet the statement of need and align with Design Principles?	The Trust does not have any alternative airspace construct suggestions.
4	Do you have any alternative airspace management suggestions that can be considered that will meet the statement of need and Design Principles?	The Trust does not have any alternative airspace management suggestions.
5	Free Text	No further comments.

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

**Sent:** 16 January 2023 16:43

**To:** [REDACTED]

**Subject:** Re: ACP-2021-088 - Stage 2

**Caution, this email originates outside of National Trust.**

Dear Stakeholder,

We recently emailed to invite opinions on the initial airspace options of our airspace change proposal, and wanted to provide a reminder in case you or your organisation want to provide feedback. If you can send any feedback by the 30 January 23 to





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[airspacechangeproposal@bristowgroup.com](mailto:airspacechangeproposal@bristowgroup.com) we would be grateful.

In case you missed our previous email, we have appended it below with the details and the accompanying documents are attached.

If you no longer wish to be included in further communications regarding this ACP, please reply to this email with 'STOP' in the subject and you will be removed from the stakeholder list.

Kind Regards,

### **Bristow Search & Rescue**

Dyce Avenue  
Dyce, Aberdeen  
AB21 0LQ



*Global Leader in Vertical Flight*

---

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

**Sent:** 21 December 2022 18:09

**To:** [REDACTED] >

**Subject:** ACP-2021-088 - Stage 2

Dear Stakeholder,

We are writing to you today to let you know that we successfully passed the Stage 1 gateway for ACP-2021-088, consequently we have progressed to Stage 2 - Develop & Assess. The initial stage (Stage - 2A) involves the development of airspace options, which are tested with you, our stakeholders.

Consequently, several options have been developed, and we would like to preliminarily test these options with you to ensure that you are satisfied that the design options align with the design principles and that we as the change sponsor have understood and accounted for your concerns within the design options. These options are set out within the attached presentation and PDF.



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We would welcome your feedback on each of the design options and have included a feedback form to aid this, though we are happy to receive feedback in any appropriate formats. Any feedback needs to be returned to us at [airspacechangeproposal@bhlgrou.com](mailto:airspacechangeproposal@bhlgrou.com) by the 30 January 2023.

Further details of the proposal can be found at [Airspace change portal \(caa.co.uk\)](https://airspacechangeportal.caa.co.uk), then selecting 'search by Airspace Change ID' and entering ACP reference ACP-2021-088.

Guidance relating to the Airspace Change Proposal and the process we are required to follow by the CAA can be found at <https://airspacechange.caa.co.uk/about-airspace-change/> and specifically CAP1616.

If you no longer wish to be included in further communications regarding this ACP, please reply to this email with 'STOP' in the subject and you will be removed from the stakeholder list.

We look forward to your feedback and continued engagement in this process.

Kind Regards,

#### **Bristow Search & Rescue**

Dyce Avenue

Dyce, Aberdeen  
AB21 0LQ



*Global Leader in Vertical Flight*

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-- The National Trust is a registered charity no. 205846. Our registered office is Heelis, Kemble Drive, Swindon, Wiltshire SN2 2NA. The views expressed in this email are personal and may not necessarily reflect those of the





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National Trust unless explicitly stated otherwise. This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. If you have received this email in error, please notify me immediately. If you are not the intended recipient of this email, you should not copy it for any purpose, or disclose its contents to any other person. Senders and recipients of email should be aware that, under the Data Protection Act 2018, the contents may have to be disclosed. The National Trust has scanned this email for security issues. However the National Trust cannot accept liability for any form of malware that may be in this email and we recommend that you check all emails with an appropriate security tool.

---

**From:** [REDACTED]  
**Sent:** 21 December 2022 18:10  
**To:** Airspace Change Proposal <[airspacechangeproposal@bristowgroup.com](mailto:airspacechangeproposal@bristowgroup.com)>  
**Subject:** Automatic reply: ACP-2021-088 - Stage 2

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---

I am currently on leave and will be returning to work on Tuesday 3 January. I will respond to your message on my return. Season's Greetings!  
-- The National Trust is a registered charity no. 205846. Our registered office is Heelis, Kemble Drive, Swindon, Wiltshire SN2 2NA. The views expressed in this email are personal and may not necessarily reflect those of the National Trust unless explicitly stated otherwise. This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. If you have received this email in error, please notify me immediately. If you are not the intended recipient of this email, you should not copy it for any purpose, or disclose its contents to any other person. Senders and recipients of email should be aware that, under the Data Protection Act 2018, the contents may have to be disclosed. The National Trust has scanned this email for security issues. However the National Trust cannot accept liability for any form of malware that may be in this email and we recommend that you check all emails with an appropriate security tool.

---

**From:** Airspace Change Proposal <[airspacechangeproposal@bristowgroup.com](mailto:airspacechangeproposal@bristowgroup.com)>  
**Sent:** 21 December 2022 18:09  
**To:** [REDACTED]  
**Subject:** ACP-2021-088 - Stage 2

Dear Stakeholder,

We are writing to you today to let you know that we successfully passed the Stage 1 gateway for ACP-2021-088, consequently we have progressed to Stage 2 - Develop & Assess. The initial stage (Stage - 2A) involves the development of airspace options, which are tested with you, our stakeholders.



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Consequently, several options have been developed, and we would like to preliminarily test these options with you to ensure that you are satisfied that the design options align with the design principles and that we as the change sponsor have understood and accounted for your concerns within the design options. These options are set out within the attached presentation and PDF.

We would welcome your feedback on each of the design options and have included a feedback form to aid this, though we are happy to receive feedback in any appropriate formats. Any feedback needs to be returned to us at [airspacechangeproposal@bhlgroup.com](mailto:airspacechangeproposal@bhlgroup.com) by the 30 January 2023.

Further details of the proposal can be found at [Airspace change portal \(caa.co.uk\)](https://airspacechangeportal.caa.co.uk), then selecting 'search by Airspace Change ID' and entering ACP reference ACP-2021-088.

Guidance relating to the Airspace Change Proposal and the process we are required to follow by the CAA can be found at <https://airspacechange.caa.co.uk/about-airspace-change/> and specifically CAP1616.

If you no longer wish to be included in further communications regarding this ACP, please reply to this email with 'STOP' in the subject and you will be removed from the stakeholder list.

We look forward to your feedback and continued engagement in this process.

Kind Regards,

#### **Bristow Search & Rescue**

Dyce Avenue

Dyce, Aberdeen  
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24966 - Natural England

Date	Summary of Engagement	Method	Remarks
21 Dec 22	Commencement of Stage 2 and initial design options for feedback (Annex C).	Email	
21 Dec 22	Automated Response.	Email	
16 Jan 23	Reminder for feedback on initial airspace design options.	Email	
16 Jan 23	Automated response.	Email	
3 Feb 23	Query on information required form Natural England	Email	
8 Feb 23	Clarification of information requested.	Email	

---

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

**Sent:** 08 February 2023 08:41

**To:** [REDACTED]

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

**Subject:** Re: [Suspected SPAM] Airspace Change Proposal - input required from Natural England?

Good Morning [REDACTED],

Thank you for your query. We are interested in any impact you feel the ACP will have on any Natural England sites or interests. The ACP is for a fairly substantial portion of the airspace over the Chanel which will be enable the continued volume of UAS activity that has been present in 2022.

If you feel that there aren't any impacts that you foresee, please let us know.

Best Regards,

[REDACTED]



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**From:** [REDACTED]  
**Sent:** 03 February 2023 13:19  
**To:** Airspace Change Proposal <airspacechangeproposal@bristowgroup.com>  
**Subject:** [Suspected SPAM] Airspace Change Proposal - input required from Natural England?

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Dear Bristow Search and Rescue

Thank you for the email which you sent to our Enquiries Team on 21<sup>st</sup> December 22. My sincere apologies that it has taken us so long to follow up with you. I'm afraid it is not clear to us from the documents which you attached what input you are seeking from Natural England or how your proposal relates to any areas within our remit. Unless you can provide us with some more specific detail we are unable to comment.

Kind Regards

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

**From:** [REDACTED]  
**Sent:** 16 January 2023 16:44  
**To:** Airspace Change Proposal <airspacechangeproposal@bristowgroup.com>  
**Subject:** Automatic reply: ACP-2021-088 - Stage 2

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Thank you for contacting the Natural England Customer Engagement Team.

Your enquiry will be logged, and you will receive a response within 10 working days or in line with the relevant statutory deadline if longer.

*If you are emailing with a Countryside Stewardship or Environmental Stewardship query, these are now dealt with by the Rural Payments Agency (RPA). Please therefore re-send your email to them at [ruralpayments@defra.gov.uk](mailto:ruralpayments@defra.gov.uk). Natural England are no longer able to deal with any of these queries.*

Many thanks  
Customer Engagement Team

[www.gov.uk/natural-england](http://www.gov.uk/natural-england)

**We are here to secure a healthy natural environment for people to enjoy, where wildlife is protected, and England's traditional landscapes are safeguarded for future generations.**

In an effort to reduce Natural England's carbon footprint, I will, wherever possible, avoid travelling to meetings and attend via audio, video, or web conferencing.

This email and any attachments is intended for the named recipient only. If you have received it in error you have no authority to use, disclose, store or copy any of its contents and you should destroy it and inform the sender. Whilst this email and associated attachments will have been checked for known viruses whilst within the Natural England systems, we can accept no responsibility once it has left our systems. Communications on Natural England systems may be monitored and/or recorded to secure the effective operation of the system and for other lawful purposes.

---

**From:** [REDACTED]  
**Sent:** 21 December 2022 18:11  
**To:** Airspace Change Proposal <[airspacechangeproposal@bristowgroup.com](mailto:airspacechangeproposal@bristowgroup.com)>  
**Subject:** Automatic reply: ACP-2021-088 - Stage 2

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*Please note that all Natural England offices will be closed from 15:30 on 23<sup>rd</sup> December 2022 until*

Many thanks  
Customer Engagement Team

[www.gov.uk/natural-england](http://www.gov.uk/natural-england)

**We are here to secure a healthy natural environment for people to enjoy, where wildlife is protected, and England's traditional landscapes are safeguarded for future generations.**

In an effort to reduce Natural England's carbon footprint, I will, wherever possible, avoid travelling to meetings and attend via audio, video, or web conferencing.

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55665 - [REDACTED]

Date	Summary of Engagement	Method	Remarks
21 Dec 22	Commencement of Stage 2 and initial design options for feedback (Annex C).	Email	
21 Dec 22	Out of Office response.	Email	
16 Jan 23	Reminder for feedback on initial airspace design options.	Email	
17 Jan 23	Feedback on initial airspace options.	Email	
19 Jan 23	Clarification sought on feedback provided.	Email	
22 Jan 23	Clarification of feedback provided.	Email	
23 Jan 23	Comments provided on feedback	Email	

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

**Sent:** 23 January 2023 10:44

**To:** [REDACTED]

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

**Subject:** Re: ACP 2021-088

Good Morning [REDACTED]

Thank you for your clarification. I will seek to address below.

Option 0. Your response in green. My concerns are outside your remit, a fact I should have made clear. [Comment: Thank you understood].

Option 1a and 1b are so similar it is difficult to address them separately. My existing comments stand, with an additional concern for 1b particularly that the workload for an information/crossing service has





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been directed to London Information. On a 'good' day, London Information is so busy it is already hard to make contact. Additionally, the radio range is at full stretch for much of the area depicted in your proposal, particularly at lower levels. If such an option is under consideration, perhaps Bristows should acquire the necessary skills, qualifications and permissions to provide that service? [Comment: Option 1a and 1b are indeed similar in terms of airspace volume, but Option 1a includes a DAAIS only and Option 1b is a DACS and DAAIS. Conversations are ongoing around what the provision of a DACS and DAAIS would look like and the provisioning organisation. We will take your feedback into consideration as we continue to develop the options].

Option 2. My comments stand largely as stated, but I accept you may not have decided. It just seems that the options on offer do not have that other box, required for elections: 'None of the above'. However, as it is: To minimize conflicts, eliminate corridors. Plus my previous response about width, height, distance and safety. [Comment: understood, if you have any wider thoughts of alternative airspace designs and management, please let us know as we are in the development stage and want to consider any viable options].

Best Regards,

██████████

---

**From:** ██████████  
**Sent:** 22 January 2023 16:18  
**To:** Airspace Change Proposal <airspacechangeproposal@bristowgroup.com>  
**Subject:** Re: ACP 2021-088

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Thank you for your comments, ██████████.

I apologise if my comments do not align with your questions.

I'll try to clarify them but perhaps I am trying to address the whole, not the limited options given.

Option 0. Your response in green. My concerns are outside your remit, a fact I should have made clear.



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Option 1a and 1b are so similar it is difficult to address them separately. My existing comments stand, with an additional concern for 1b particularly that the workload for an information/crossing service has been directed to London Information. On a 'good' day, London Information is so busy it is already hard to make contact. Additionally, the radio range is at full stretch for much of the area depicted in your proposal, particularly at lower levels. If such an option is under consideration, perhaps Bristows should acquire the necessary skills, qualifications and permissions to provide that service?

Option 2. My comments stand largely as stated, but I accept you may not have decided. It just seems that the options on offer do not have that other box, required for elections: 'None of the above'. However, as it is: To minimize conflicts, eliminate corridors. Plus my previous response about width, height, distance and safety.

(To really minimize conflict, use a method of delivery that is not so new that everything else has to change to accommodate it).

Im sorry I cannot respond exactly in the format required. There are many issues affecting aviation and consultation fatigue sets in. Those are my thoughts and opinions as a local stakeholder and at the risk of being regarded as a dinosaur, my thought is that we lose free access to airspace far too easily.

Sincerely



On Thursday, 19 January 2023 at 16:12:06 GMT, Airspace Change Proposal <airspacechangeproposal@bristowgroup.com> wrote:

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**From:** Airspace Change Proposal <airspacechangeproposal@bristowgroup.com>  
**Sent:** 19 January 2023 16:12  
**To:** [REDACTED]  
**Subject:** Re: ACP 2021-088

Good Afternoon,

Thank you for your feedback. Can we please clarify the feedback provided as it appears misaligned with the initial options. We have set out below the option, and transposed the feedback you have provided in blue against the Option it is related to. Where appropriate we have added comments in green in response.





**Option 0 - Do Nothing.** The airspace remains as Class G with no segregated airspace i.e. pre Temporary Danger Area.

- Although you state it is unviable, due to lack of approved See and Avoid capability, this is due to the limitations of UAS, specifically introduced to the area. Incidents to date? [Comment: CAA regulations require UAS to be segregated from other air uses, unless an approved See and Avoid Capability is provided. No See and Avoid capabilities have been approved for use by the CAA, therefore without segregation UAS is unable to operated under this option].
- "Option inherently unsafe due to lack of the existence of a CAA approved DAA capability" is a statement with seemingly little fact to justify it, given the movements stated previously and absence of noted incidents. [Comment: The CAA regulatory framework dictates the requirements for operating UAS; UAS is segregated from other air traffic or an approved DAA (See & Avoid) solution is available. Operating without a DAA solution or segregation would not be approved by the CAA as would be deemed inherently unsafe, due to not meeting the regulatory framework].
- The problem is with the UAS, not the pre-existing movements. The statement of need (you link on the latest document is broken) does not justify fully a large expansion as I understand it. [Comment: we will seek to correct the link, in the meantime all documentation can be view of the CAA Airspace Change Portal under ACP 2021-088 reference].

**Option 1A.** Permanent Danger Area.

- A permanent Danger Area is against the essential principles of airspace design. Class G would be all but eliminated under this proposal and there is no consideration of how any crossing service would be operated. It is agreed that it is unworkable and draconian.
- The times of operation are stated, with the height and shape of the areas affected are depicted clearly by planning software. Avoiding them or overflying is achievable without the need to contact an agency (e.g. Lydd) and thus keeps things simple.
- There would be some benefits in adopting this option, somewhat offset by the additional NOTAM generated.

**Option 1B.** Permanent Danger Area with a DAAIS and DACS

- This option outlines Danger Area with a Danger Area Crossing Service and a Danger Area Activity Information Service.
- Do you have any feedback regarding this option?



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**Option 2.** Danger Area with Transit Corridor.

- Evidently this is your preferred option, but the one way corridors are poorly designed: the inbound route is far longer and keeps aircraft over water far further than necessary, in a narrow corridor. Both routes and narrow corridors will reduce safety. This would have a major impact on my flights, both over and beyond the coastline.
- Crossing corridors should be over the shortest routes with further corridors further south also. Concentrating all cross-Channel traffic to one route in either direction is absurd.
- A relatively low-level corridor is not necessarily problematic provided the upper level of the airspace is achievable but what provision is there if, for instance, for traffic operating in VMC if conditions deteriorate enroute? Does a descent to 1,200' constitute an infringement?
- [Comment: There is no preferred option at this stage as we are exploring all the potential options with stakeholder to understand the impact each option would have, so that we can develop options that minimises any impacts.
- The corridors were suggested from SFC to 1500ft, with UAS operating 2000 to 2500ft.

Best Regards,

From: [REDACTED]

Sent: 17 January 2023 13:02

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

Subject: ACP 2021-088

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

Dear Sir

I write as a private pilot living in and flying from the local area, the latter both locally and across the English Channel. My views below are in response, as best I can, to the proposals and the options in the document referenced above, dated 23 December 2022:

Option 1A. Do nothing. Although you state it is unviable, due to lack of approved See and Avoid capability, this is due to the limitations of UAS, specifically introduced to the area. Incidents to date? There would be some benefits in adopting this option, somewhat offset by the additional NOTAM generated. The times of operation are stated, with the height and shape of the areas affected are depicted clearly by planning software. Avoiding them or overflying is achievable without the need to contact an agency (eg Lydd) and thus keeps things simple.



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"Option inherently unsafe due to lack of the existence of a CAA approved DAA capability" is a statement with seemingly little fact to justify it, given the movements stated previously and absence of noted incidents. The problem is with the UAS, not the pre-existing movements. The statement of need (you link on the latest document is broken) does not justify fully a large expansion as I understand it.

Option 1A. A permanent Danger Area is against the essential principles of airspace design. Class G would be all but eliminated under this proposal and there is no consideration of how any crossing service would be operated. It is agreed that it is unworkable and draconian.

Option 1B. Evidently this is your preferred option, but the one way corridors are poorly designed: the inbound route is far longer and keeps aircraft over water far further than necessary, in a narrow corridor. Both routes and narrow corridors will reduce safety. This would have a major impact on my flights, both over and beyond the coastline.

Crossing corridors should be over the shortest routes with further corridors further south also. Concentrating all cross-Channel traffic to one route in either direction is absurd.

A relatively low-level corridor is not necessarily problematic provided the upper level of the airspace is achievable but what provision is there if, for instance, for traffic operating in VMC if conditions deteriorate en route? Does a descent to 1,200' constitute an infringement?

I trust these responses will be considered, even though from one individual.

I have serious concerns about the usefulness( and cost) of this UAS activity but there is no facility to express this - of course.

[REDACTED]

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**From:** Airspace Change Proposal <airspacechangeproposal@bristowgroup.com>  
**Sent:** 16 January 2023 16:43  
**To:** [REDACTED]  
**Subject:** Re: ACP-2021-088 - Stage 2

Dear Stakeholder,

We recently emailed to invite opinions on the initial airspace options of our airspace change proposal, and wanted to provide a reminder in case you or your organisation want to provide feedback. If you can send any feedback by the 30 January 23 to [airspacechangeproposal@bristowgroup.com](mailto:airspacechangeproposal@bristowgroup.com) we would be grateful.

In case you missed our previous email, we have appended it below with the details and the accompanying documents are attached.







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If you no longer wish to be included in further communications regarding this ACP, please reply to this email with 'STOP' in the subject and you will be removed from the stakeholder list.

Kind Regards,

## Bristow Search & Rescue

Dyce Avenue

Dyce, Aberdeen  
AB21 0LQ



*Global Leader in Vertical Flight*

---

**From:** Airspace Change Proposal <airspacechangeproposal@bristowgroup.com>  
**Sent:** 21 December 2022 18:10  
**To:** [REDACTED]  
**Subject:** ACP-2021-088 - Stage 2

Dear Stakeholder,

We are writing to you today to let you know that we successfully passed the Stage 1 gateway for ACP-2021-088, consequently we have progressed to Stage 2 - Develop & Assess. The initial stage (Stage - 2A) involves the development of airspace options, which are tested with you, our stakeholders.

Consequently, several options have been developed, and we would like to preliminarily test these options with you to ensure that you are satisfied that the design options align with the design principles and that we as the change sponsor have understood and accounted for your concerns within the design options. These options are set out within the attached presentation and PDF.

We would welcome your feedback on each of the design options and have included a feedback form to aid this, though we are happy to receive feedback in any appropriate formats. Any



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feedback needs to be returned to us at [airspacechangeproposal@bhlgrou.com](mailto:airspacechangeproposal@bhlgrou.com) by the 30 January 2023.

Further details of the proposal can be found at [Airspace change portal \(caa.co.uk\)](http://caa.co.uk), then selecting 'search by Airspace Change ID' and entering ACP reference ACP-2021-088.

Guidance relating to the Airspace Change Proposal and the process we are required to follow by the CAA can be found at <https://airspacechange.caa.co.uk/about-airspace-change/> and specifically CAP1616.

If you no longer wish to be included in further communications regarding this ACP, please reply to this email with 'STOP' in the subject and you will be removed from the stakeholder list.

We look forward to your feedback and continued engagement in this process.

Kind Regards,

### **Bristow Search & Rescue**

Dyce Avenue

Dyce, Aberdeen  
AB21 0LQ



*Global Leader in Vertical Flight*

**From:** [REDACTED]  
**Sent:** 21 December 2022 18:11  
**To:** Airspace Change Proposal <[airspacechangeproposal@bristowgroup.com](mailto:airspacechangeproposal@bristowgroup.com)>  
**Subject:** Auto Response: ACP-2021-088 - Stage 2

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Hello, I am away until 22/12/2022 and am unable to read your message.

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**From:** Airspace Change Proposal <airspacechangeproposal@bristowgroup.com>  
**Sent:** 21 December 2022 18:10  
**To:** [REDACTED]  
**Subject:** ACP-2021-088 - Stage 2

Dear Stakeholder,

We are writing to you today to let you know that we successfully passed the Stage 1 gateway for ACP-2021-088, consequently we have progressed to Stage 2 - Develop & Assess. The initial stage (Stage - 2A) involves the development of airspace options, which are tested with you, our stakeholders.

Consequently, several options have been developed, and we would like to preliminarily test these options with you to ensure that you are satisfied that the design options align with the design principles and that we as the change sponsor have understood and accounted for your concerns within the design options. These options are set out within the attached presentation and PDF.

We would welcome your feedback on each of the design options and have included a feedback form to aid this, though we are happy to receive feedback in any appropriate formats. Any feedback needs to be returned to us at [airspacechangeproposal@bhlgroupp.com](mailto:airspacechangeproposal@bhlgroupp.com) by the 30 January 2023.

Further details of the proposal can be found at [Airspace change portal \(caa.co.uk\)](https://airspacechangeportal.caa.co.uk), then selecting 'search by Airspace Change ID' and entering ACP reference ACP-2021-088.

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If you no longer wish to be included in further communications regarding this ACP, please reply to this email with 'STOP' in the subject and you will be removed from the stakeholder list.

We look forward to your feedback and continued engagement in this process.

Kind Regards,

**Bristow Search & Rescue**

Dyce Avenue





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Dyce, Aberdeen  
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24234 - [REDACTED]

Date	Summary of Engagement	Method	Remarks
21 Dec 22	Commencement of Stage 2 and initial design options for feedback (Annex C).	Email	
16 Jan 23	Reminder for feedback on initial airspace design options.	Email	
23 Jan 23	Feedback on initial airspace design options.	Email	
26 Jan 23	Response to feedback on initial airspace design options.	Email	

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

**Sent:** 26 January 2023 14:40

**To:** [REDACTED]

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

**Subject:** Re: ACP-2021-088 - Stage 2

Good Afternoon [REDACTED],

Thank you for your feedback, picking up in your conclusions:

1. Make D098D and D098E into smaller chunks including vertically that can be de-activated.

Response: We will consider this as part of the development of the options and consultation with the regulator. Lateral smaller 'chunks' could be an option, however the vertical dimensions more challenging as these are set by the UAS technical limitations and the current vertical limits are required to operate the system with the extend of the segregated airspace.

2. All Danger Areas to be activated by daily Notam for specific times only, otherwise to be considered inactive. DAAIS and DACS to be constantly updated with which parts are active and all other parts to be considered class G.

Response: The of airspace class G is not being changed as part of this ACP, rather the application seeks to employ segregated which sit over the Class G. This means that Class G remains extant when the Danger Area is inactive. Activation of any airspace structure would be conducted in accordance with the relevant authority (CAA/NATS).





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3. DACS is imperative with a dedicated controller and clearances based on reported altitudes with 500ft max required clearance to the drone.

Response: A DACS is being considered as part of Option 1b, with the operating parameters yet to be determined.

4. Co ordination with French DA/TDA also imperative, to allow aircraft a direct route through.

Response: French and Belgium aviation regulators are included as stakeholders for this ACP.

5. The long term solution must be certified autonomous Detect and Avoid fitted to the drones, based on optical/radar/LiDAR type devices. Not based on any requirement for all other users to have some EC or other devices fitted.

Response: This is outside the scope of this ACP, these comments should be directed to the CAA for consideration as part of their ongoing workstreams around Future Airspace Modernisation.

6. The success of the operation in turning around illegal boats or life saving to be assessed 6 monthly to see if it's working and is fulfilling its purpose, if not the complete Danger area complex to be removed.

Response: This effectiveness of the UK migrant response will be monitored and determined by HMG departments and agencies. It is likely that should it be determined that the Danger Area is no longer required it will be removed.

Best Regards,

[Redacted]

---

**From:** [Redacted]  
**Sent:** 23 January 2023 22:00  
**To:** Airspace Change Proposal <airspacechangeproposal@bristowgroup.com>  
**Subject:** Re: ACP-2021-088 - Stage 2

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

Hi,  
Please find following my comments on your ACP 088 presentation stage 2A

Where is the justification for the vertical limits? I can certainly see that the UAV can see further the higher it is, but similarly as it can move fairly quickly it could cover a large area in a short amount of time, much faster than any boats and not need to be so high. A geostationary satellite could be used for an overview, yes I know you aren't going to launch one, but perhaps it already exists. It is generally accepted that drones/UAVs should be flown below 400ft, these principals should be maintained wherever possible.



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Most of the airspace is limited vertically to 1500ft, where is the need to have some upto 2500ft, this is significantly more of a problem to cross channel general aviation traffic.

You mention that no detect and avoid capability has been approved by the CAA, but it has been by the FAA and is in use in military drones, so this should not be a reason not to use it, part of the acceptance of any Danger Areas and TDAs for drones should be contingent on the drone operators developing a truly autonomous detect and avoid system and getting it approved by the CAA. TMZs and using Electronic conspicuity are not the solution in any case as this requires all other airspace users to purchase equipment just so the drones can operate, whereas it should be the drone operators that are paying for the total system. It must be remembered here that we are not just talking about GA aircraft we are talking about all airspace users even model fliers or other drone users. Drones also need to avoid things like cranes, kites, moving ships masts etc thus an autonomous system such as those based on LIDAR need to be developed and be the standard system for drones.

Agree that a TMZ is not and will never be the solution.

In Option 0 you are making estimates on the amount of GA traffic crossing the channel based aircraft transiting through Lydd's airspace or taking off and landing from Lydd. This is wholly inaccurate. Lydd's airspace only extends 1.5nm from the center of the airfield upto just over 2000ft, the vast majority of cross channel GA traffic won't go anywhere near there and most won't be talking to Lydd ATC even if they are further away. I would generally cross from the Dover/Folkestone area towards Gap Griz Nez or Calais, nowhere near Lydd airspace, on the rare occasions I've gone direct toward Lydd it's been on good weather days when I've been much higher than their airspace so again not needed to call them. Most people I know transit from/to the Dover area nowhere near Lydd.

During the summer there are many transits particularly returning from France after 1700 local, I regularly return home around 1900-2000 and am around a 1hr flight from the channel.

While in nice weather I would like to transit in the 2000-5500ft band that you suggest, sometimes this is not possible due to clouds and so a lower level transit is required, sometimes this is only over a portion of the route too, having to descend over the water and then able to climb again over the land, particularly when leaving the U.K. in the morning I've found. This is where the TDA or a DA without DACS becomes problematic, with a prohibition to descend, even though the drone might not be anywhere near. But I would rather descend and take my chances with the drone, rather than fly into cloud, although I'd probably turn back before that scenario.

answers to your questions for Design Option 1A (having it as a PDF presentation doesn't help!)

1.

no for item 1 because option 1A makes the whole area a permanent DA whereas with the TDA only half the area was supposed to be active. Thus the dangers imposed by not being able to legally descend below cloud are doubled.

No for item 3 it also impacts GA users at altitudes below 2500ft in some areas. It also makes the impact worse as the current TDAs were supposed to be operated such that one half was NOTAMED as active and the other half would not be active, whereas now everything is a DA all the time with no DACS.

2. This option would be very bad, even worse than with the TDAs given that the complete area would be a permanent DA. Having no DACS is not acceptable.

3/4. If the airspace was in smaller blocks which would only be activated when being used and deactivate immediately when not used and a DAAIS could legally state that the block is inactive and thus transit could be approved then it would work better, but this information would need to be updated every few minutes and the blocks be much narrower and perhaps one on top of the other as well, so for example 1000ft -2500ft could be inactive when the drone still operating below 1000ft.

This would be quite complicated though and require dedicated people constantly updating the DAAIS, it would be better to have a DACS.



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5.

- i. A better idea would be urgent CAA certification of a LIDAR based autonomous Detect and avoid system such as used in the US or on military drones and then use this on your drone and make the airspace back to all class G.
- ii. There also needs to be Co-ordination with the French danger areas to allow GA traffic through both if necessary due to weather and not have aircraft circling at the border to get a clearance.
- iii. The Danger Areas although permanent should still only be activated by Notam with a daily Notam saying where and when it's active and should be de-activated officially as soon as activity stops.

#### Option 1B answers

1. No because priority 2 isn't met unless the DACS is always available and always gives a crossing clearance.

For example if the DACS is provided by a dedicated controller doing nothing else and if clearance is always given as long as say 500ft or 1 mile separation of the drone could be given based on reported altitude, then this would be much more acceptable than say DACS provided by Lydd ATC who are also busy controlling their own circuit traffic and perhaps giving "basic service" to some other aircraft, so getting a word in to request clearance might be difficult and also if the clearance is only based on the drone not being in the large chunk of airspace such as those used for the TDAs.

2. Option 1B would be much more acceptable than Option 1A, but assuming the DACS was provided by a dedicated controller using a reasonable separation criteria such as 500ft reported altitude. (No requirement for any transponder identification etc) if I say I'm at 1000ft and the drone is at 500ft that should be sufficient.

3. The blocks of airspace should be smaller, so more can be de-activated at a time including by altitude, say above 1000ft becomes inactive if the drone is operating at 500ft. Particularly D098D and D098E should be splits into two or more areas going across the channel

4. Using the airspace suggested in 3, de-activate as much as possible all the time.

5. Same answers as for Option 1A, but particularly with the DACS, there needs to be Co-ordination with the French such that a direct clearance can be sorted out by either side.

#### Option 2 answers

1. No, item 3 is not true due to the restrictive nature of the corridors and their location. If it was two larger corridors say either side of the line from Dover to Cap Griz Nez, this would be more acceptable. It would hopefully be possible to evaluate before crossing whether a transit above 2500ft was possible or need to go below 1500ft, but it's still restrictive for the cases where unforecast cloud with base not much above 2500ft would not allow a descent.

2. As drawn it's probably as bad as option 1A, with the corridors moved as suggested above, it would be better than 1A, but really still needs a DACS incase of unforecast or moving weather such as a small thunderstorm blocking the corridor, but not affecting the area around it.

3. As above make the corridors wider and either side of a line from Cap Griz Nez to Dover. A 1500ft corridor would also be better being 500ft-2000ft, and also allow the drone to operate below 500ft and between 2000-2500ft.

5. The corridors would need to extend through any French Danger Areas too.

My conclusions are.

1. Make D098D and D098E into smaller chunks including vertically that can be de-activated.





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2. All Danger Areas to be activated by daily Notam for specific times only, otherwise to be considered inactive. DAAIS and DACS to be constantly updated with which parts are active and all other parts to be considered class G.
3. DACS is imperative with a dedicated controller and clearances based on reported altitudes with 500ft max required clearance to the drone.
4. Co ordination with French DA/TDA also imperative, to allow aircraft a direct route through.
5. The long term solution must be certified autonomous Detect and Avoid fitted to the drones, based on optical/radar/LiDAR type devices. Not based on any requirement for all other users to have some EC or other devices fitted.
6. The success of the operation in turning around illegal boats or life saving to be assessed 6 monthly to see if it's working and is fulfilling its purpose, if not the complete Danger area complex to be removed.

Best regards

██████████

Sent from my iPad

---

On 16 Jan 2023, at 16:44, Airspace Change Proposal <[airspacechangeproposal@bristowgroup.com](mailto:airspacechangeproposal@bristowgroup.com)> wrote:

Dear Stakeholder,

We recently emailed to invite opinions on the initial airspace options of our airspace change proposal, and wanted to provide a reminder in case you or your organisation want to provide feedback. If you can send any feedback by the 30 January 23 to [airspacechangeproposal@bristowgroup.com](mailto:airspacechangeproposal@bristowgroup.com) we would be grateful.

In case you missed our previous email, we have appended it below with the details and the accompanying documents are attached.

If you no longer wish to be included in further communications regarding this ACP, please reply to this email with 'STOP' in the subject and you will be removed from the stakeholder list.

Kind Regards,

**Bristow Search & Rescue**





Maritime &  
Coastguard  
Agency



Dyce Avenue  
Dyce, Aberdeen  
AB21 0LQ

<image.png>

*Global Leader in Vertical Flight*

---

**From:** Airspace Change Proposal <airspacechangeproposal@bristowgroup.com>  
**Sent:** 21 December 2022 18:11  
**To:** [REDACTED]  
**Subject:** ACP-2021-088 - Stage 2

Dear Stakeholder,

We are writing to you today to let you know that we successfully passed the Stage 1 gateway for ACP-2021-088, consequently we have progressed to Stage 2 - Develop & Assess. The initial stage (Stage - 2A) involves the development of airspace options, which are tested with you, our stakeholders.

Consequently, several options have been developed, and we would like to preliminarily test these options with you to ensure that you are satisfied that the design options align with the design principles and that we as the change sponsor have understood and accounted for your concerns within the design options. These options are set out within the attached presentation and PDF.

We would welcome your feedback on each of the design options and have included a feedback form to aid this, though we are happy to receive feedback in any appropriate formats. Any feedback needs to be returned to us at [airspacechangeproposal@bhlgroup.com](mailto:airspacechangeproposal@bhlgroup.com) by the 30 January 2023.

Further details of the proposal can be found at [Airspace change portal \(caa.co.uk\)](https://www.caa.co.uk/airspace-change), then selecting 'search by Airspace Change ID' and entering ACP reference ACP-2021-088.

Guidance relating to the Airspace Change Proposal and the process we are required to follow by the CAA can be found at <https://airspacechange.caa.co.uk/about-airspace-change/> and specifically CAP1616.

If you no longer wish to be included in further communications regarding this ACP, please reply to this email with 'STOP' in the subject and you will be removed from the stakeholder list.



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We look forward to your feedback and continued engagement in this process.

Kind Regards,

**Bristow Search & Rescue**

Dyce Avenue  
Dyce, Aberdeen  
AB21 0LQ

<image.png>

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<20221212 - Stage 2A - Options v5.pdf>

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43243 - Nordic Unmanned

Date	Summary of Engagement	Method	Remarks
21 Dec 22	Commencement of Stage 2 and initial design options for feedback (Annex C).	Email	
16 Jan 23	Reminder for feedback on initial airspace design options.	Email	



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67461 - Old Hay Airfield

Date	Summary of Engagement	Method	Remarks
21 Dec 22	Commencement of Stage 2 and initial design options for feedback (Annex C).	Email	
16 Jan 23	Reminder for feedback on initial airspace design options.	Email	



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12342 - Oysterair

Date	Summary of Engagement	Method	Remarks
21 Dec 22	Commencement of Stage 2 and initial design options for feedback (Annex C).	Email	
16 Jan 23	Reminder for feedback on initial airspace design options.	Email	



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67872 - Pafra Flying Club

Date	Summary of Engagement	Method	Remarks
21 Dec 22	Commencement of Stage 2 and initial design options for feedback (Annex C).	Email	
16 Jan 23	Reminder for feedback on initial airspace design options.	Email	



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99006 - Pent Farm Airfield

Date	Summary of Engagement	Method	Remarks
21 Dec 22	Commencement of Stage 2 and initial design options for feedback (Annex C).	Email	
16 Jan 23	Reminder for feedback on initial airspace design options.	Email	





11234 - [REDACTED]

Date	Summary of Engagement	Method	Remarks
21 Dec 22	Commencement of Stage 2 and initial design options for feedback (Annex C).	Email	
16 Jan 23	Reminder for feedback on initial airspace design options.	Email	
16 Jan 23	Feedback on initial airspace design options.	Email	
17 Jan 23	Request for details of current TDA complex manager.	Email	
18 Jan 23	AIP contact details for TekEver shared.	Email	
18 Jan 23	Thank you for Tekever details.	Email	
19 Jan 23	Response to feedback provided.	Email	

**From:** Airspace Change Proposal

**Sent:** 19 January 2023 11:44

**To:** [REDACTED]

**Subject:** Re: ACP-2021-088

Good Morning [REDACTED],

Thank you for your feedback which we will include as we continue to develop the options in the coming weeks. I thought it would be useful to address your last two points, so that you understand some of the constraints we are operating under.

- One of the several UAS being operated (Schiebel S-100) is unable to be operated at the ranges commensurate with the segregated airspace volume at altitudes of less than 1500ft. This is due to the communications link being radio line of sight, which to be maintained requires the UAS to increase its altitude the further away from the control station the aircraft is. This is why the current TDA altitude ceilings exist at their current levels, and is a technical limitation of the system.



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- The UK SAR capability operated by Bristow Helicopters on behalf of the Maritime and Coast Guard Agency, around the UK is provided by manned SAR helicopters. The additional demand due to the volume and frequency of small vessels crossing the Chanel, requires additional SAR assets. The MCA engaged BHL to deliver a UAS service to meet the additional demand. The UAS CAA regulatory framework requires UAS to be segregated from other air users, unless a CAA approved Detect and Avoid Solution is present. Currently there are no CAA approved Detect and Avoid Solutions, which results in the requirement to segregated UAS activities from other air users.

Best Regards,

[Redacted]

---

**From:** [Redacted]  
**Sent:** 18 January 2023 10:32  
**To:** Airspace Change Proposal <airspacechangeproposal@bristowgroup.com>  
**Subject:** Re: Airspace Proposal Sponsor Details

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

---

[Redacted]  
[Redacted]

[Redacted]  
[Redacted]

[Redacted]  
[Redacted]

---

[Redacted]  
[Redacted]



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The details for Tekever who are responsible for the existing TDA complex D098 are:

- [REDACTED]  
[REDACTED]

Kind Regards,

Owen

---

**From:** [REDACTED]  
**Sent:** 17 January 2023 12:28  
**To:** Airspace Change Proposal <[airspacechangeproposal@bristowgroup.com](mailto:airspacechangeproposal@bristowgroup.com)>  
**Subject:** Airspace Proposal Sponsor Details

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

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Dear [REDACTED],

Further to our brief conversation about Stage 2 Consultation I would be extremely grateful if you could supply me/us with the direct contact details for the current sponsor of the Airspace Proposal so that we can converse with them about the Low Level Airspace that the Human Powered Aircraft Flights would like/need to operate in whilst crossing the English Channel/La Manche.

As mentioned in our phone call we are hoping to have all competitors ( likelihood is 5 Entrants in total ) completing the Crossing at some point between June 2023 - Aug 2024.  
We envisage that the competitors will notify us of their intended timescale to do the crossing & we will notify all Authorities in good time of proposed dates within our timescale.

We envisage that the 5 Competitors might all pick different dates to make their HPA Crossing so there could be 5 days of HPA Activity that we will monitor, as previously mentioned these type of HPA will operate at less than 200ft AMSL ( more probable 50-100ft AMSL )

I look forward to your response & thank you for your enthusiastic assistance in this matter.



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[REDACTED]

*B. Kelsey*

[REDACTED]

[REDACTED]

[REDACTED]

)

*The sender has requested a read receipt. If you do not wish to provide one, [click here](#).*

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The information contained in this communication from the sender is confidential. It is intended solely for use by the recipient and others authorized to receive it. If you are not the recipient, you are hereby notified that any disclosure, copying, distribution or taking action in relation of the contents of this information is strictly prohibited and may be unlawful.

---

**From:** [REDACTED]  
**Sent:** Monday, January 16, 2023 23:57  
**To:** Airspace Change Proposal  
**Subject:** ACP-2021-088

Thank you for your email and invitation to respond.

Regarding the options it is clear that option 0 would not allow the required BVLOS operations at all and can be discounted. Option 2 is complex and the practicality of flying down a narrow corridor in unpredictable weather makes this an undesirable option. Of the 2 variations of option 1, 1b inconveniences other airspace users the least.



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A DACS as well as a DAAIS is essential not just for the convenience of other airspace users but for their safety as well. Cross channel weather is unpredictable and pilots must not be pressured into flying above the DA in cloud to avoid an infringement. They need a frequency to arrange a crossing, or to inform ATC that they will need to descend into the DA for safety reasons and that this is unavoidable. The level of traffic in the DA will be small and such an event can hardly be disruptive given the infrequency of such occurrences.

Cannot the upper level of the DA be reduced. 2000 and 2500 feet, and even 1500 feet, are high for VFR traffic. Is it really necessary or has a generous buffer been applied to the requirements of the drone traffic?  
Could it not be reduced to 1000 feet generally and 1500-2000 in very restricted areas?

Any mention of Search and Rescue services being part of the justification for this proposal should be deleted. S&R takes place all over the UK without danger areas to protect it. When the requirement for BVLOS disappears in the future the continuation of S&R should then not be used as a justification for maintaining the danger areas.

Kind regards,

[Redacted]

[Redacted]

---

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

**Sent:** 16 January 2023 19:48

**To:** [Redacted]

**Subject:** Re: ACP-2021-088 - Stage 2

Dear Stakeholder,

We recently emailed to invite opinions on the initial airspace options of our airspace change proposal, and wanted to provide a reminder in case you or your organisation want to provide feedback. If you can send any feedback by the 30 January 23 to [airspacechangeproposal@bristowgroup.com](mailto:airspacechangeproposal@bristowgroup.com) we would be grateful.

In case you missed our previous email, we have appended it below with the details and the accompanying documents are attached.



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If you no longer wish to be included in further communications regarding this ACP, please reply to this email with 'STOP' in the subject and you will be removed from the stakeholder list.

Kind Regards,

### **Bristow Search & Rescue**

Dyce Avenue  
Dyce, Aberdeen  
AB21 0LQ



*Global Leader in Vertical Flight*

---

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

**Sent:** 21 December 2022 19:16

**To:** [REDACTED]

**Subject:** ACP-2021-088 - Stage 2

Dear Stakeholder,

We are writing to you today to let you know that we successfully passed the Stage 1 gateway for ACP-2021-088, consequently we have progressed to Stage 2 - Develop & Assess. The initial stage (Stage - 2A) involves the development of airspace options, which are tested with you, our stakeholders.

Consequently, several options have been developed, and we would like to preliminarily test these options with you to ensure that you are satisfied that the design options align with the design principles and that we as the change sponsor have understood and accounted for your concerns within the design options. These options are set out within the attached presentation and PDF.

We would welcome your feedback on each of the design options and have included a feedback form to aid this, though we are happy to receive feedback in any appropriate formats. Any feedback needs to be returned to us at [airspacechangeproposal@bhlgroup.com](mailto:airspacechangeproposal@bhlgroup.com) by the 30 January 2023.



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Further details of the proposal can be found at [Airspace change portal \(caa.co.uk\)](https://www.caa.co.uk/air-space-change-portal), then selecting 'search by Airspace Change ID' and entering ACP reference ACP-2021-088.

Guidance relating to the Airspace Change Proposal and the process we are required to follow by the CAA can be found at <https://airspacechange.caa.co.uk/about-airspace-change/> and specifically CAP1616.

If you no longer wish to be included in further communications regarding this ACP, please reply to this email with 'STOP' in the subject and you will be removed from the stakeholder list.

We look forward to your feedback and continued engagement in this process.

Kind Regards,

**Bristow Search & Rescue**

Dyce Avenue  
Dyce, Aberdeen  
AB21 0LQ



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17445 - PPL/IR (Europe)

Date	Summary of Engagement	Method	Remarks
21 Dec 22	Commencement of Stage 2 and initial design options for feedback (Annex C).	Email	
16 Jan 23	Reminder for feedback on initial airspace design options.	Email	





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74645 - Redhill Aerodrome

Date	Summary of Engagement	Method	Remarks
21 Dec 22	Commencement of Stage 2 and initial design options for feedback (Annex C).	Email	
16 Jan 23	Reminder for feedback on initial airspace design options.	Email	



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68663 - [REDACTED]

Date	Summary of Engagement	Method	Remarks
21 Dec 22	Commencement of Stage 2 and initial design options for feedback (Annex C).	Email	
16 Jan 23	Reminder for feedback on initial airspace design options.	Email	



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55669 - [REDACTED]

Date	Summary of Engagement	Method	Remarks
21 Dec 22	Commencement of Stage 2 and initial design options for feedback (Annex C).	Email	
16 Jan 23	Reminder for feedback on initial airspace design options.	Email	



00001 - [REDACTED]

Date	Summary of Engagement	Method	Remarks
21 Dec 22	Commencement of Stage 2 and initial design options for feedback (Annex C).	Email	
21 Dec 22	Email pointing out that no documents were present on CAA Airspace Change Portal.	Email	
21 Dec 22	Reply saying that the documents would be available on the CAA Airspace Change Portal on 22 Dec 22.	Email	
16 Jan 23	Reminder for feedback on initial airspace design options.	Email	
17 Jan 23	Request to extend deadline of 31 Jan for feedback.	Email	
19 Jan 23	Response saying an extension cannot be provided at this stage.	Email	

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

**Sent:** 19 January 2023 12:06

**To:** [REDACTED]

**Subject:** Re: ACP-2021-088 - Stage 2

Good Afternoon [REDACTED],

Thank you for your email, I am afraid we are unable to extend the deadline at this stage, as we have a series of external gateways to meet as part of the ACP process.

We are currently in the options development stage, so will be continuing to refine each of the initial options, with the final options being included in the formal consultation later this year, which you will be included in.



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Best Regards,

██████████

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**From:** ██████████  
**Sent:** 17 January 2023 08:00  
**To:** Airspace Change Proposal <airspacechangeproposal@bristowgroup.com>  
**Subject:** Re: ACP-2021-088 - Stage 2

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Thank you for your email.  
It is my intention to respond.

In view of the complexity of the proposal, I request an extension to the proposed deadline.

Regards

██████████

██████████

---

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

**From:** Airspace Change Proposal <airspacechangeproposal@bristowgroup.com>  
**Date:** 16/01/2023 17:44 (GMT+00:00)  
**To:** ██████████  
**Subject:** Re: ACP-2021-088 - Stage 2

Dear Stakeholder,

We recently emailed to invite opinions on the initial airspace options of our airspace change proposal, and wanted to provide a reminder in case you or your organisation want to provide feedback. If you can send any feedback by the 30 January 23 to [airspacechangeproposal@bristowgroup.com](mailto:airspacechangeproposal@bristowgroup.com) we would be grateful.

In case you missed our previous email, we have appended it below with the details and the accompanying documents are attached.



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If you no longer wish to be included in further communications regarding this ACP, please reply to this email with 'STOP' in the subject and you will be removed from the stakeholder list.

Kind Regards,

**Bristow Search & Rescue**

Dyce Avenue  
Dyce, Aberdeen  
AB21 0LQ



*Global Leader in Vertical Flight*

---

**From:** Airspace Change Proposal <airspacechangeproposal@bristowgroup.com>  
**Sent:** 21 December 2022 19:28  
**To:** [REDACTED]  
**Subject:** Re: ACP-2021-088 - Stage 2

Good Evening [REDACTED],

The documents sent in the previous email, will be uploaded to the Airspace Change Portal in the morning.

Best Regards,

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 21 December 2022 18:36  
**To:** Airspace Change Proposal <airspacechangeproposal@bristowgroup.com>  
**Subject:** RE: ACP-2021-088 - Stage 2

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Thank you for your email.





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I see nothing in the ACP for stage 2.

---

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

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

Date: 21/12/2022 18:15 (GMT+00:00)

To: [REDACTED]

Subject: ACP-2021-088 - Stage 2

Dear Stakeholder,

We are writing to you today to let you know that we successfully passed the Stage 1 gateway for ACP-2021-088, consequently we have progressed to Stage 2 - Develop & Assess. The initial stage (Stage - 2A) involves the development of airspace options, which are tested with you, our stakeholders.

Consequently, several options have been developed, and we would like to preliminarily test these options with you to ensure that you are satisfied that the design options align with the design principles and that we as the change sponsor have understood and accounted for your concerns within the design options. These options are set out within the attached presentation and PDF.

We would welcome your feedback on each of the design options and have included a feedback form to aid this, though we are happy to receive feedback in any appropriate formats. Any feedback needs to be returned to us at [airspacechangeproposal@bhlgrou.com](mailto:airspacechangeproposal@bhlgrou.com) by the 30 January 2023.

Further details of the proposal can be found at **[MailScanner has detected a possible fraud attempt from "airspacechange.caa.co.uk" claiming to be Airspace change portal \(caa.co.uk\)](#)**, then selecting 'search by Airspace Change ID' and entering ACP reference ACP-2021-088.

Guidance relating to the Airspace Change Proposal and the process we are required to follow by the CAA can be found at <https://airspacechange.caa.co.uk/about-airspace-change/> and specifically CAP1616.

If you no longer wish to be included in further communications regarding this ACP, please reply to this email with 'STOP' in the subject and you will be removed from the stakeholder list.

We look forward to your feedback and continued engagement in this process.

Kind Regards,



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## Bristow Search & Rescue

Dyce Avenue  
Dyce, Aberdeen  
AB21 0LQ



*Global Leader in Vertical Flight*

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67457 - [REDACTED]

Date	Summary of Engagement	Method	Remarks
21 Dec 22	Commencement of Stage 2 and initial design options for feedback (Annex C).	Email	
16 Jan 23	Reminder for feedback on initial airspace design options.	Email	



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67460 - [REDACTED]

Date	Summary of Engagement	Method	Remarks
21 Dec 22	Commencement of Stage 2 and initial design options for feedback (Annex C).	Email	
16 Jan 23	Reminder for feedback on initial airspace design options.	Email	



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91358 - Rochester Airport

Date	Summary of Engagement	Method	Remarks
21 Dec 22	Commencement of Stage 2 and initial design options for feedback (Annex C).	Email	
16 Jan 23	Reminder for feedback on initial airspace design options.	Email	



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12654 - Romney Marsh Countryside Partnership

Date	Summary of Engagement	Method	Remarks
21 Dec 22	Commencement of Stage 2 and initial design options for feedback (Annex C).	Email	
16 Jan 23	Reminder for feedback on initial airspace design options.	Email	



98877 - Royal Society for the Protection of Birds (RSPB)

Date	Summary of Engagement	Method	Remarks
21 Dec 22	Commencement of Stage 2 and initial design options for feedback (Annex C).	Email	
21 Dec 22	Automated response.	Email	
22 Dec 22	Internal redirection to appropriate team.	Email	
16 Jan 23	Reminder for feedback on initial airspace design options.	Email	
16 Jan 23	Automated response.	Email	
26 Jan 23	Change contact details to	Email	
26 Jan 23	Notice that contact details have been amended.	Email	
26 Jan 23	RSPB Response.	Email	

---

**From:** Carrie Marchbank <carrie.marchbank@rspb.org.uk>  
**Sent:** 26 January 2023 13:38  
**To:** Airspace Change Proposal <airspacechangeproposal@bristowgroup.com>  
**Subject:** RE: ACP-2021-088 - Stage 2

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

Many thanks [REDACTED].

Kind regards  
[REDACTED]



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**From:** Airspace Change Proposal <airspacechangeproposal@bristowgroup.com>  
**Sent:** 26 January 2023 13:16  
**To:** [REDACTED]  
**Subject:** Re: ACP-2021-088 - Stage 2

Good Afternoon [REDACTED],

The contact details relating to this ACP have been amended to [REDACTED]

Best Regards,

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 26 January 2023 10:17  
**To:** Airspace Change Proposal <airspacechangeproposal@bristowgroup.com>  
**Subject:** FW: ACP-2021-088 - Stage 2

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

Many thanks for contacting the RSPB.

We would be grateful if you could forward any further correspondence regarding proposals in South East England to the following email address: [REDACTED]

For proposals concerning other parts of the UK, please use the following email address and your query will be passed on to the relevant team: [REDACTED].

Many thanks

[REDACTED]

[REDACTED]

[REDACTED]

Home-based | Normal working pattern: Monday to Thursday



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### UK Headquarters

[Redacted]  
[Redacted]  
[Redacted]  
[Redacted]  
[Redacted]



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Protecting habitats, saving species and helping to end the nature and climate emergency.  
**Nature is in crisis. Together we can save it.**

---

The Royal Society for the Protection of Birds (RSPB) is a registered charity:  
England and Wales no. 207076, Scotland no. SC037654.

---

**From:** [Redacted]  
**Sent:** 16 January 2023 17:45  
**To:** Airspace Change Proposal <airspacechangeproposal@bristowgroup.com>  
**Subject:** Thank you for contacting the Wildlife Team

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

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**This automated message is to let you know that your email has been received by us and is in safe hands. We look forward to reading it as soon as we can.**

**If your email is urgent and needs a quick response** please take the time to read the below “Common and Urgent topics” where we have provided links and guidance on the most common and urgent emails we are receiving, in hope that this advice is enough to help you. **Please note: Due to the high levels of correspondence we receive, in cases where we cannot provide anymore advice, than what is provided below (including links to our webpages and further auto responses), you may not receive a further reply.**





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### Thank you for helping nature

We'd like to take this chance to thank you for everything you do for nature either as a RSPB Member, Supporter or just a Nature Lover. Together we can really make a difference to so many threatened species, from screaming swifts and booming bitterns to the field cricket! If you are not yet a member and would like to join please click [here](#)

Best wishes from everyone at the RSPB.

### Common and Urgent topics

- **Injured bird/ trapped birds-** please click [here](#) (Please note as a conservation charity we have no rescue facilities or welfare expertise to help injured wildlife). If however the bird is stuck in a chimney please see [here](#)
- **Cat brought in/ has attacked a bird** - Birds which have been caught by a cat should always be taken to a vet as a matter of urgency because of the high risk of septicaemia, which is fatal within around 48 hours.
- **Wildlife Crime-** If you have witnessed a crime or suspect an offence against wildlife, please see this link on how to report crimes [here](#)
- **Swans on roads-** It is common after rainfall for swans to mistake wet roads as waterbodies and find themselves caught out on the side of roads. The bird may be unable to take off if there is insufficient space, if that appears to be the case, please contact a wildlife rescue such as the RSPCA or [Swan Sanctuary](#), for further advise. If the bird is found on the road or trapped on a central reservation, or a rescue represents a real danger to the rescuer, the traffic police should be informed.
- **Avian Influenza-** For information on how to report suspected cases of avian flu please see [here](#)
- **Big Garden Birdwatch-** To register for Big Garden Birdwatch, you can do so online by visiting [here](#). Due to the popularity of the event, we can only send out 1 guide by post per registration. If you sign up to take part online guides can be downloaded for you to print or share if you wish, from our website.
- **Big Garden Birdwatch help-** See our most commonly asked questions and answers [here](#)

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The RSPB is committed to maintaining your data privacy. We promise to keep your details safe and will never sell them on to third parties. To find out more about how we use your information please read our [online Privacy Policy](#):

---

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

**Sent:** 16 January 2023 17:44

**To:** [REDACTED]

**Subject:** Re: ACP-2021-088 - Stage 2

Dear Stakeholder,





Maritime &  
Coastguard  
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We recently emailed to invite opinions on the initial airspace options of our airspace change proposal, and wanted to provide a reminder in case you or your organisation want to provide feedback. If you can send any feedback by the 30 January 23 to [airspacechangeproposal@bristowgroup.com](mailto:airspacechangeproposal@bristowgroup.com) we would be grateful.

In case you missed our previous email, we have appended it below with the details and the accompanying documents are attached.

If you no longer wish to be included in further communications regarding this ACP, please reply to this email with 'STOP' in the subject and you will be removed from the stakeholder list.

Kind Regards,

## Bristow Search & Rescue

Dyce Avenue  
Dyce, Aberdeen  
AB21 0LQ



*Global Leader in Vertical Flight*

---

**From:** [REDACTED]  
**Sent:** 22 December 2022 15:15  
**To:** Airspace Change Proposal <[airspacechangeproposal@bristowgroup.com](mailto:airspacechangeproposal@bristowgroup.com)>  
**Subject:** RE: ACP-2021-088 - Stage 2

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---

Good afternoon,

Thank you for contacting the RSPB.





Maritime &  
Coastguard  
Agency



**Bristow**  
Search and Rescue

I can confirm that your email has been forwarded on to the relevant team.

Many thanks again for getting in touch.

Kind Regards

[Redacted signature]



[Redacted text]



[Redacted text]

[Redacted text]

[Redacted text]

[Redacted text]

[Redacted text]



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Coastguard  
Agency



### Thank you for helping nature

We'd like to take this chance to thank you for everything you do for nature either as a RSPB Member, Supporter or just a Nature Lover. Together we can really make a difference to so many threatened species, from screaming swifts and booming bitterns to the field cricket! If you are not yet a member and would like to join please click [here](#)

Best wishes from everyone at the RSPB.

### Common and Urgent topics

- **Injured bird/ trapped birds-** please click [here](#) (Please note as a conservation charity we have no rescue facilities or welfare expertise to help injured wildlife). If however the bird is stuck in a chimney please see [here](#)
- **Cat brought in/ has attacked a bird** - Birds which have been caught by a cat should always be taken to a vet as a matter of urgency because of the high risk of septicaemia, which is fatal within around 48 hours.
- **Wildlife Crime-** If you have witnessed a crime or suspect an offence against wildlife, please see this link on how to report crimes [here](#)
- **Swans on roads-** It is common after rainfall for swans to mistake wet roads as waterbodies and find themselves caught out on the side of roads. The bird may be unable to take off if there is insufficient space, if that appears to be the case, please contact a wildlife rescue such as the RSPCA or [Swan Sanctuary](#), for further advise. If the bird is found on the road or trapped on a central reservation, or a rescue represents a real danger to the rescuer, the traffic police should be informed.
- **Avian Influenza-** For information on how to report suspected cases of avian flu please see [here](#)
- **Big Garden Birdwatch-** To register for Big Garden Birdwatch, you can do so online by visiting [here](#). Due to the popularity of the event, we can only send out 1 guide by post per registration. If you sign up to take part online guides can be downloaded for you to print or share if you wish, from our website.
- **Big Garden Birdwatch help-** See our most commonly asked questions and answers [here](#)

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95117 - RVL Group

Date	Summary of Engagement	Method	Remarks
21 Dec 22	Commencement of Stage 2 and initial design options for feedback (Annex C).	Email	
16 Jan 23	Reminder for feedback on initial airspace design options.	Email	



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89890 - SaxonAir

Date	Summary of Engagement	Method	Remarks
21 Dec 22	Commencement of Stage 2 and initial design options for feedback (Annex C).	Email	
16 Jan 23	Reminder for feedback on initial airspace design options.	Email	



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93939 - Shoreham/Brighton City Airport

Date	Summary of Engagement	Method	Remarks
21 Dec 22	Commencement of Stage 2 and initial design options for feedback (Annex C).	Email	
16 Jan 23	Reminder for feedback on initial airspace design options.	Email	



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18698 - Spilsted Airfield

Date	Summary of Engagement	Method	Remarks
21 Dec 22	Commencement of Stage 2 and initial design options for feedback (Annex C).	Email	
16 Jan 23	Reminder for feedback on initial airspace design options.	Email	



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79863 - Stanstead Airport

Date	Summary of Engagement	Method	Remarks
21 Dec 22	Commencement of Stage 2 and initial design options for feedback (Annex C).	Email	
16 Jan 23	Reminder for feedback on initial airspace design options.	Email	





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57467 - Strictly Flying.com

Date	Summary of Engagement	Method	Remarks
21 Dec 22	Commencement of Stage 2 and initial design options for feedback (Annex C).	Email	
16 Jan 23	Reminder for feedback on initial airspace design options.	Email	



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83929 - Summit Aviation

Date	Summary of Engagement	Method	Remarks
21 Dec 22	Commencement of Stage 2 and initial design options for feedback (Annex C).	Email	
16 Jan 23	Reminder for feedback on initial airspace design options.	Email	



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62369 - Swanborough Farm Strip

Date	Summary of Engagement	Method	Remarks
21 Dec 22	Commencement of Stage 2 and initial design options for feedback (Annex C).	Email	
16 Jan 23	Reminder for feedback on initial airspace design options.	Email	



48297 - Tekever

Date	Summary of Engagement	Method	Remarks
21 Dec 22	Commencement of Stage 2 and initial design options for feedback (Annex C).	Email	
10 Jan 23	Meeting with Tekever to be walked through the three initial airspace options, prior to the development and provision of feedback on options.	Video Call	
17 Jan 23	Tekever informed us that feedback regarding this ACP would be provided by their contracting authority The Home Office.	Phone Call	



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34535 - [REDACTED]

Date	Summary of Engagement	Method	Remarks
21 Dec 22	Commencement of Stage 2 and initial design options for feedback (Annex C).	Email	
13 Jan 23	Feedback on initial airspace design options	Email	
13 Jan 23	Response to feedback.	Email	
14 Jan 23	Request for information of D098 TDA complex activation.	Email	
16 Jan 23	Response to quest outline that BHL don't have this information as not the airspace managers.	Email	
16 Jan 23	Email requesting contact details for Tekever for TDA activation data	Email	
16 Jan 23	Contact details for Tekever from AIP D098 sent.	Email	

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

**Sent:** 16 January 2023 11:04

**To:** [REDACTED]

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

**Subject:** Re: ACP 2021-088 Stage 2A consultation

Tony,

Looking at the AIP for D098 the contact details are [REDACTED]

Best Regards,

[REDACTED]



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---

**From:** [REDACTED]  
**Sent:** 16 January 2023 10:16

Hi [REDACTED],

Do you by any chance have a contact e-mail address for Tekever?  
They would probably be easier to get hold of than NATS or the CAA..

Regards

---

**From:** Airspace Change Proposal <airspacechangeproposal@bristowgroup.com>  
**Sent:** 16 January 2023 09:48  
**To:** [REDACTED]  
**Cc:** Airspace Change Proposal <airspacechangeproposal@bristowgroup.com>  
**Subject:** Re: ACP 2021-088 Stage 2A consultation

Good Morning [REDACTED],

Unfortunately we don't hold this information for the current TDA complex D098 as it is managed by Tekever on behalf of the Home Office.

I would have thought that the CAA or NATS will have this information readily available as there is a requirement for the managing authority of TDAs to report their activation.

Best Regards,

---

**From:** [REDACTED]  
**Sent:** 14 January 2023 07:46  
**To:** Airspace Change Proposal <airspacechangeproposal@bristowgroup.com>  
**Subject:** RE: ACP 2021-088 Stage 2A consultation



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Hello [REDACTED],

Thanks for your reply confirming receipt of my comments.

Out of interest, do you retain logs/statistics of DA098 airspace utilisation?  
I would be interested to know how often each of the eight separate DAs have actually used on a daily basis over the last 12 months.

Regards

---

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

**Sent:** 13 January 2023 12:28

**To:** [REDACTED]

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

**Subject:** Re: ACP 2021-088 Stage 2A consultation

Good Afternoon [REDACTED],

Thank you for the comprehensive feedback which we will feed in as we continue to develop the airspace options.

It is worth noting that the UAS currently operated in the existing TDA complex by BHL and Tekever are all fitted with transponders all of which are Mode S & ADSB out. This this would likely continue as it forms part of the relevant operating safety cases approved by the CAA.

Best Regards,

---

**From:** [REDACTED]

**Sent:** 13 January 2023 08:11

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

**Subject:** ACP 2021-088 Stage 2A consultation



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

Dear Sir/Madam,

I wish to provide comments/feedback regarding your ACP 2021-088 Stage 2A consultation, dated 23 December 2022.

Please see the attached Word document which complies with the feedback format requested.

My general view is that, for most GA VFR only flights crossing the Channel, the current Danger Areas are not really an issue .

However, if cloud cover or poor visibility requires pilots to fly lower then a DACS of some kind will be required.

For your information, I am Mode S-ES transponder equipped and transmit ADS-B OUT.

I also am equipped with a SkyEcho 2 ADS-B IN receiver so can detect aircraft in my vicinity that are transmitting ADS-B Out.

I believe modern EC capabilities/solutions should be considered as part of the solution for you providing a DACS.

Regards

[Redacted signature block]





## DESIGN OPTION 1A - PERMANENT DANGER AREA WITH DAAIS ¶

¶

1. → Do you agree with the initial assessment against the agreed Design Principles? If not please provide details? ¶

**NO:** This design solution does not provide an “assured” DA crossing service for VFR Only GA flights. ¶

2. → How would this option impact you? ¶

I am a strictly “VFR only” pilot so must always avoid cloud. Limited fuel endurance means I am restricted to legs of approx. 2 hrs maximum, plus 40 minutes reserves. ¶

Although I always plan on crossing the Channel at altitudes of at least 3000 ft there have been occasions when I have needed to cross at much lower levels to avoid cloud, perhaps as low as 500-1000 ft AMSL. A tactical low-level crossing is unlikely to be possible “in real-time” with only a London Information based DAAIS available. ¶

3. → Do you have any alternative airspace construct suggestions that will meet the statement of need and align with Design Principles? ¶

**YES:** See your Design Option 1B. ¶

4. → Do you have any alternative airspace management suggestions that can be considered that will meet the statement of need and Design Principles? ¶

**YES:** See free text feedback below. ¶

5. → **Free text:** Modern ADS-B based “situational awareness” solutions are currently available that don’t require a ground based radar capability. Please investigate the ADS-B trials that were recently conducted at Goodwood airfield to see how effective they were for situational awareness of compliant ADS-B Out equipped aircraft and unmanned drones. By using such a technical solution it should be possible for a ground based operator to provide a DACS to ADS-B Out equipped GA aircraft to ensure safe, adequate, separation from HMCG operated helicopters and drones that may be operating in the DAs. ¶

¶



## DESIGN OPTION 1B -- DANGER AREA WITH DAAIS AND DACS ¶

¶

1. → Do you agree with the initial assessment against the agreed Design Principles? If not please provide details? ¶  
**YES:** This design solution does provide an “assured” DA crossing service for VFR Only GA flights. ¶
2. → How would this option impact you? ¶  
This design option would work very well for me, a strictly “VFR only” pilot, who must always avoid cloud. If I needed to descend into an active DA for weather/cloud avoidance then this will be possible with a DACS. ¶
3. → Do you have any alternative airspace construct suggestions that will meet the statement of need and align with Design Principles? **NO:** ¶
4. → Do you have any alternative airspace management suggestions that can be considered that will meet the statement of need and Design Principles? ¶  
**YES:** See free text feedback below. ¶
5. → **Free text:** As far as I can ascertain, each separate DA is currently active for very long, default durations (0200 – 1400Z daily), perhaps when not actually required. Can you please consider having a more flexible DA “activation” process so specific DAs are only active when actually required for HMCG taskings? This is especially important during the period 0700 – 1400 when most GA VFR flights will be crossing the Channel. ¶

¶



## DESIGN OPTION 2 - DANGER AREA WITH CORRIDOR ¶



1. → Do you agree with the initial assessment against the agreed Design Principles? If not please provide details? ¶

**PARTIALLY:** This design solution does provide an “assured” DA crossing capability for VFR Only GA flights, but suggested corridor location is not optimal for the majority of GA VFR Channel crossings. ¶

2. → How would this option impact you? ¶

This design option would **not** work particularly well for me. From my home airfield in southern England (near Basingstoke) I would have to route significantly further east around Lydd airfield towards Dover in order to access the “east bound” corridor for crossings to France/Belgium. My limited fuel range would mean I would always have to refuel at somewhere like Lydd or Headcorn before proceeding with a Channel crossing. ¶

3. → Do you have any alternative airspace construct suggestions that will meet the statement of need and align with Design Principles? ¶

**YES:** Add a pair of additional crossing corridors from (approximately) the Hastings area towards the direction Le Touquet airfield. ¶

4. → Do you have any alternative airspace management suggestions that can be considered that will meet the statement of need and Design Principles? ¶

**YES:** See free text feedback below. ¶

5. → **Free text:** As far as I can ascertain, each separate DA is currently active for very long, default durations (0200—1400Z daily), perhaps when not actually required. Can you please consider having a more flexible DA “activation” process so specific DAs are only active when actually required for HMCG taskings? This is especially important during the period 0700—1400 when most GA VFR flights will be crossing the Channel. ¶





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76756 - The Wing Walk Company

Date	Summary of Engagement	Method	Remarks
21 Dec 22	Commencement of Stage 2 and initial design options for feedback (Annex C).	Email	
16 Jan 23	Reminder for feedback on initial airspace design options.	Email	



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11111 - Thurston Helicopters

Date	Summary of Engagement	Method	Remarks
21 Dec 22	Commencement of Stage 2 and initial design options for feedback (Annex C).	Email	
16 Jan 23	Reminder for feedback on initial airspace design options.	Email	



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47027 - Tiffenden Airfield

Date	Summary of Engagement	Method	Remarks
21 Dec 22	Commencement of Stage 2 and initial design options for feedback (Annex C).	Email	
16 Jan 23	Reminder for feedback on initial airspace design options.	Email	



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35435 - [REDACTED]

Date	Summary of Engagement	Method	Remarks
21 Dec 22	Commencement of Stage 2 and initial design options for feedback (Annex C).	Email	
16 Jan 23	Reminder for feedback on initial airspace design options.	Email	



67459 - Udimore Airstrip (N50 56 33, E 00 41 20)

Date	Summary of Engagement	Method	Remarks
21 Dec 22	Commencement of Stage 2 and initial design options for feedback (Annex C).	Email	
24 Dec 22	Feedback on airspace options	Email	
10 Jan 23	Response and clarification on feedback received	Email	
10 Jan 23	Further feedback clarifications and queries.	Email	
10 Jan 23	Response to further feedback.	Email	

---

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

**Sent:** 10 January 2023 18:59

**To:** [REDACTED]

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

**Subject:** Re: ACP-2021-088 - Stage 2 Feedback

Good Evening [REDACTED],

Thank you.

1. Noted and we will include as we develop the options.
2. The technical data or specification is proprietary information of the Original Equipment Manufacturer that is Confidential and therefore we are unable to share. The control station is located at Lydd Airport, and you will understand that some of the ranges are circa 40nm to the furthest points within the current segregated airspace, hence the northern TDA ceiling of 2500 ft.
3. The current proposal is for a Danger Area Crossing Service as part of Option 1b. Although some initial conversations have taken place to determine its feasibility, these will need to be matured as we progress through Stage 2 if this is deemed to be a viable option.

Best Regards,





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██████████  

---

**From:** ██████████  
**Sent:** 10 January 2023 18:40  
**To:** Airspace Change Proposal <airspacechangeproposal@bristowgroup.com>  
**Subject:** Re: ACP-2021-088 - Stage 2 Feedback

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Dear ██████████, my response using corresponding nomenclature:

1/ To mitigate the risk of flying over water the shortest route should be adopted, therefore the corridors should encompass this route. I am not against corridors if they are large enough and managed to avoid conflict of inbound and outbound traffic.

2/ This is a surprising limitation given the shortest crossing distance is just 21 miles. Can you offer some technical information to back this up. e.g. what is the transmitters RMS power output, where is the origin of the control station transmitter and is there data or a specification to back up this claim?

3/ we need to agree what level of service is to be provided using the existing control definitions please specify what service will be offered.

4/ noted

Thanks for your feedback, regards ██████████ .

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

From: "Airspace Change Proposal" <airspacechangeproposal@bristowgroup.com>  
To: ██████████  
Cc: "Airspace Change Proposal" <airspacechangeproposal@bristowgroup.com>  
Sent: Tuesday, 10 Jan, 2023 At 17:50  
Subject: Re: ACP-2021-088 - Stage 2 Feedback  
Good Evening ██████████.

Thank you for your feedback. I have included some comments / thoughts below and we would welcome your thoughts.





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1. To clarify, you are generally not in favour of corridors or would you prefer to see corridors across the shortest part of the channel if they could be managed safely?
2. One of the several UAS being operated (Schiebel S-100) is unable to be operated at the ranges commensurate with the segregated airspace volume at altitudes of less than 1500ft. This is due to the communications link being radio line of sight, which to be maintained requires the UAS to increase its altitude the further away from the control station the aircraft is. This is why the current TDA altitude ceilings exist at their current levels, and is a technical limitation of the system.
3. We will explore how and if this can be provided for Option 1b as the airspace options are developed and refined.
4. No review date has been determined as we are currently working through the CAP1616 process. There is however a commitment, for any segregated airspace to be removed should the UK Government's requirement be withdrawn, this will of course be dictated by the Home Office and Maritime and Coastguard Agency.

Best Regards,



---

**From:** [REDACTED]  
**Sent:** 24 December 2022 11:19  
**To:** Airspace Change Proposal <airspacechangeproposal@bristowgroup.com>  
**Subject:** Re: ACP-2021-088 - Stage 2 Feedback

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Dear sirs, my feedback as follows:

1/ Option 2 the corridors proposed do not take in into account the fundamental safety reasons why many G.A. pilots cross the shortest stretch of water.

2/ All options : Drones can operate at 1000ft amsl, there are no pilots on board to warrant a "safety" consideration ,it seems economic loss is considered above pilot safety.

3/ Option 1B appears to offer some improvement on the non radar service currently offered on the English side of the international boundary. The transit service should be available upon in flight request as to not impose more safety compromises.



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4/ The adoption of long term airspace changes contradicts the current governments policy to stop trafficking, is there a review date set and when is this to be?

[REDACTED] A. Pilot

---

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

From: [REDACTED]

To: [REDACTED]

Sent: Wednesday, 21 Dec, 2022 At 19:12

Subject: ACP-2021-088 - Stage 2

Dear Stakeholder,

We are writing to you today to let you know that we successfully passed the Stage 1 gateway for ACP-2021-088, consequently we have progressed to Stage 2 - Develop & Assess. The initial stage (Stage - 2A) involves the development of airspace options, which are tested with you, our stakeholders.

Consequently, several options have been developed, and we would like to preliminarily test these options with you to ensure that you are satisfied that the design options align with the design principles and that we as the change sponsor have understood and accounted for your concerns within the design options. These options are set out within the attached presentation and PDF. We would welcome your feedback on each of the design options and have included a feedback form to aid this, though we are happy to receive feedback in any appropriate formats. Any feedback needs to be returned to us at [airspacechangeproposal@bhlgrou.com](mailto:airspacechangeproposal@bhlgrou.com) by the 30 January 2023.

Further details of the proposal can be found at [Airspace change portal \(caa.co.uk\)](https://www.caa.co.uk/airspace-change-portal), then selecting 'search by Airspace Change ID' and entering ACP reference ACP-2021-088.

Guidance relating to the Airspace Change Proposal and the process we are required to follow by the CAA can be found at <https://airspacechange.caa.co.uk/about-airspace-change/> and specifically CAP1616.

If you no longer wish to be included in further communications regarding this ACP, please reply to this email with 'STOP' in the subject and you will be removed from the stakeholder list.

We look forward to your feedback and continued engagement in this process.

Kind Regards,



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## **Bristow Search & Rescue**

Dyce Avenue

Dyce, Aberdeen  
AB21 0LQ

*Global Leader in Vertical Flight*

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00905 - UK Airprox Board (UKAB)

Date	Summary of Engagement	Method	Remarks
21 Dec 22	Commencement of Stage 2 and initial design options for feedback (Annex C).	Email	
16 Jan 23	Reminder for feedback on initial airspace design options.	Email	



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80171 - UK Flight Safety Committee (UKFSC)

Date	Summary of Engagement	Method	Remarks
21 Dec 22	Commencement of Stage 2 and initial design options for feedback (Annex C).	Email	
16 Jan 23	Reminder for feedback on initial airspace design options.	Email	



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74920 - United States Air Force Europe (3rd Air Force-Directorate of Flying (USAFE (3rd AF-DOF))

Date	Summary of Engagement	Method	Remarks
21 Dec 22	Commencement of Stage 2 and initial design options for feedback (Annex C).	Email	
16 Jan 23	Reminder for feedback on initial airspace design options.	Email	



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67467 - Unknown Airfield

Date	Summary of Engagement	Method	Remarks
21 Dec 22	Commencement of Stage 2 and initial design options for feedback (Annex C).	Email	
16 Jan 23	Reminder for feedback on initial airspace design options.	Email	





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32682 - Vintage Aero

Date	Summary of Engagement	Method	Remarks
21 Dec 22	Commencement of Stage 2 and initial design options for feedback (Annex C).	Email	
16 Jan 23	Reminder for feedback on initial airspace design options.	Email	



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19367 - Witherenden Airfield

Date	Summary of Engagement	Method	Remarks
21 Dec 22	Commencement of Stage 2 and initial design options for feedback (Annex C).	Email	
16 Jan 23	Reminder for feedback on initial airspace design options.	Email	



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67466 - Witherenden Microlight Club

Date	Summary of Engagement	Method	Remarks
21 Dec 22	Commencement of Stage 2 and initial design options for feedback (Annex C).	Email	
16 Jan 23	Reminder for feedback on initial airspace design options.	Email	



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76283 - Woodchurch Airfield

Date	Summary of Engagement	Method	Remarks
21 Dec 22	Commencement of Stage 2 and initial design options for feedback (Annex C).	Email	
16 Jan 23	Reminder for feedback on initial airspace design options.	Email	



## Engagement Evidence – Stakeholders identified during Stage 2A.

The section below includes the interaction with the stakeholders identified during the engagement on the proposed design principles.

The stakeholder communications are arranged alphabetically by stakeholder, and include those that took place between 21 December 2022 and 24 February 2023.

73654 – [REDACTED]

Date	Summary of Engagement	Method	Remarks
21 Dec 22	Commencement of Stage 2 and initial design options for feedback (Annex C).	Email	
30 Dec 22	Request to be added to stakeholder list going forwards.	Email	
10 Jan 23	Confirmation of adding to stakeholder list and request for feedback on airspace design options.	Email.	
15 June 23	Feedback on initial airspace options.	Email	
16 Jan 23	Thank you for responses	Email	

---

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

**Sent:** 16 January 2023 10:02

**To:** [REDACTED]

**Subject:** Re: ACP 2022-088

Good Morning [REDACTED],

Apologies you explained your interest previously which we have.

Best Regards,

[REDACTED]



Maritime &  
Coastguard  
Agency



**From:** Airspace Change Proposal <airspacechangeproposal@bristowgroup.com>  
**Sent:** 16 January 2023 09:58  
**To:** [REDACTED]  
**Subject:** Re: ACP 2022-088

Good Morning [REDACTED],

Thank you for your feedback. Can I please clarify your interest in the airspace, just so we can ensure group feedback by interest?

Best Regards,

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 15 January 2023 09:20  
**To:** Airspace Change Proposal <airspacechangeproposal@bristowgroup.com>  
**Subject:** ACP 2022-088

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

[REDACTED]

Stakeholder feedback

Option 1A

- 1, Yes
- 2, very restrictive, weather in the channel often requires a VFR pilot to fly below 1500 feet
- 3, No
- 4, No

Option 1B

- 1, Yes
- 2, will the DACS be available from sunrise to sunset ?
- 3, No
- 4, No

Option 2





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**Bristow**  
Search and Rescue

Kind regards

[Redacted signature]

[Redacted signature]

[Redacted signature]

[Redacted signature]

[Redacted signature]

[Redacted signature]





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Coastguard  
Agency



54209 – [REDACTED]

Date	Summary of Engagement	Method	Remarks
21 Dec 22	Commencement of Stage 2 and initial design options for feedback (Annex C).	Email	
31 Dec 22	Request to be added to stakeholder list going forwards.	Email	
10 Jan 23	Confirmation of adding to stakeholder list and request for feedback on airspace design options.	Email.	
12 Jan 23	Feedback and request for corridor to be included.	Email	
13 Jan 23	Follow on email to confirm stakeholder had access to the initial airspace design options.	Email	

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

**Sent:** 13 January 2023 12:02

**To:** [REDACTED]

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

**Subject:** Re: Airspace changes (proposed)

Good Morning [REDACTED],

Have you had access to the initial airspace options, on the CAA portal, as Option 2 includes two separate corridors from SFC to 1500ft one from UK to Fr and Fr to UK? If not I have attached for your interest, and any feedback would be welcomed.

Further details of the proposal can be found at [Airspace change portal \(caa.co.uk\)](https://caa.co.uk), then selecting 'search by Airspace Change ID' and entering ACP reference ACP-2021-088.

Best Regards,





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Agency



█  

---

**From:** █  
**Sent:** 12 January 2023 09:31  
**To:** Airspace Change Proposal <airspacechangeproposal@bristowgroup.com>  
**Subject:** Re: Airspace changes (proposed)

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

Hi █

Thanks for including me in your consultation.

Would it be possible to include a low level corridor (say 1000') between u.k. and France in case of low cloud base to assist VFR traffic?

Regards

█  

---

**From:** Airspace Change Proposal <airspacechangeproposal@bristowgroup.com>  
**Sent:** 10 January 2023 19:51  
**To:** █  
**Subject:** Re: Airspace changes (proposed)

Good Evening █

Thank you for your email, we have added you to the stakeholder list going forwards.

If you have any feedback on the initial airspace design options it would be appreciated.

Kind Regards,

█  

---

**From:** █  
**Sent:** 31 December 2022 12:30



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**To:** Airspace Change Proposal <airspacechangeproposal@bristowgroup.com>  
**Subject:** Airspace changes (proposed)

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---

Dear Sirs

I have got a g.a. airfield south of Canterbury and would like to be included in your consultation document

Regards

██████████

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87674 – [REDACTED]

Date	Summary of Engagement	Method	Remarks
28 Dec 22	Feedback on initial airspace design options.	Email	
10 Jan 23	Response to feedback	Email.	
11 Jan 23	Additional clarification and feedback	Email	
11 Jan 23	Thank you for feedback	Email	

---

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

**Sent:** 11 January 2023 17:32

**To:** [REDACTED]

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

**Subject:** Re: ACP 2021-088

Good Afternoon [REDACTED],

Thank you for your feedback and we welcome any thoughts or input you have.

If you have any further details on how any of the options could be structured or improved, we can consider them as we continue to refine them over the coming weeks and months.

Best Regards,

[REDACTED]

---

**From:** [REDACTED]

**Sent:** 11 January 2023 07:54

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

**Subject:** Re: ACP 2021-088

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Thank you for your email.

Yes, I would support option 1B. Would you please entertain additional thoughts about option 2?

I would like to add that Option 2 would raise issues around the accuracy of navigation and the increased risk of loss on control in flight and inadvertent flight into IMC.

There are no ways to accurately navigate a cross channel corridor VFR using traditional, dead-reckoning methods. I would suspect many users would navigate it using uncertified methods (moving map tablet software) unless it was aligned with the LYD VOR/NDB, for example.... However, my experience as a CRI and generally, would suggest that a large number of private pilots have very limited, to no ability to track a VOR/NDB at all, let alone accurately. While moving map software has been proven to be pretty accurate most of the time, it comes with the risk of user error, device malfunction etc. On a tight corridor, these hazards could result in a DA infringement.

I think we have to also always bear in mind that crossing the English Channel in a light aircraft for many, even some experienced pilots, is not straightforward. Even on a good weather day, you can lose the visual horizon due to the blending of the sky with the sea. If pilots are flying at or below 1500ft, it's because weather conditions are already marginal, or they may find themselves at these levels due to an unexpected deterioration in the weather. The TAFs and METARs for Lydd, Lille and Le Touquet may have been fine, but weather in the channel can be quite different, and has been shown to catch people out with fatal consequences.

Adding further stress and complexity by forcing pilots to navigate within a tight corridor, with no visual cues of the horizon or ground below and especially where they cannot deviate should they encounter poor weather due to the DA either side, could be a significant risk to flight safety. One could argue that they perhaps shouldn't be crossing if weather conditions are that marginal anyhow, but some will and I've crossed more than once when conditions have unexpectedly become IMC in spots mid crossing, even though weather reports on both sides of the channel are VMC. In my opinion, option 2 substantially raises the risk of loss of control in flight, inadvertent flight into IMC and DA infringement.

With kind regards

██████████

---

On 10 Jan 2023, at 21:09, Airspace Change Proposal <[airspacechangeproposal@bristowgroup.com](mailto:airspacechangeproposal@bristowgroup.com)> wrote:

Good evening ██████,

Thank you for your feedback. We take on board your points made in reference to the air traffic picture. We have reached out to our





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data suppliers in an attempt to improve and better inform the baseline moving forward.

Not being the sponsor or management authority for the current TDA makes it difficult for us comment on any legacy agreements made regards to the current TDA's activation. What we can say is given the dynamic nature of our current taskings, not having access to the whole complex (when required) has the potential to limit our effectiveness and HM Coastguards response to migrant crossings. As I'm sure you can appreciate, Search and Rescue by its very nature can be dynamic and unpredictable. The MCA and Bristow do however recognise and acknowledge the potential impact large scale, TDA/DA activations can have on other air users. By design and process, this ACP sets out to provide opportunity for open and transparent engagement to not only address the State's requirement but also the issues posed by the current TDA.

As such we fully appreciate the positive impact the introduction of DACS service may have from both a safety and airspace access/management standpoint. Work continues with Lydd Airport to develop concepts of operation to support option 1B.

Could we please just clarify Option 1B is the one you feel is most viable from those proposed?

Kind Regards,

Bristow Search & Rescue  
Dyce Avenue  
Dyce, Aberdeen  
AB21 0LQ

Global Leader in Vertical Flight.

---

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

From: [REDACTED]  
Sent: 28 December 2022 07:32  
To: Airspace Change Proposal <[airspacechangeproposal@bristowgroup.com](mailto:airspacechangeproposal@bristowgroup.com)>  
Subject: ACP 2021-088

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---

Dear Sirs

Re: ACP 2021-088 Stage 2A - Develop Airspace - Change Options

My feedback on your Stage 2A document published on 23 December is as follows;

Your assumptions about traffic overflight numbers do not take into account air traffic transiting the English Channel speaking to London Information, or non-radio traffic. Your document only counts those receiving a service from Lydd APP which I would suggest are in the minority of those making the cross channel transit. These figures therefore cannot be relied upon.

The ACP also doesn't make mention of the number of overflights to Belgium where the ceiling of the DA is higher and focusses on transits to northern France. Your figures cannot be used to represent the impact on cross channel airspace users.

There needs to be a clearer way of showing which danger areas are active and when, especially when the airspace is activated and not. It all currently seems to be permanently activated on the flight briefing tools I use. Sections of the TDA were only supposed to be active when needed and not all at once.



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At the very least, a DACS is required and ideally with the provision of a radar service providing traffic information. To effectively close off hundreds of miles of airspace for the use of one UAS is overkill and disproportionate, when access could be granted and managed with a properly funded ATS.

Yours faithfully

██████████  
██████████

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45635 – [REDACTED]

Date	Summary of Engagement	Method	Remarks
7 Jan 23	Feedback on initial airspace design options.	Email	
10 Jan 23	Response to feedback	Email.	

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

**Sent:** 10 January 2023 22:04

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

**Subject:** RE: Airspace Proposal Options

Good Evening [REDACTED],

Thank you for your response and feedback.

We are more than open to discussing with representatives from your organisation. Could I please ask to which you are referring to and for any contact details you may have?

This proposal focuses on the potential impact to air space users as detailed and approved by the CAA at our Stage 1 gateway. Stage 1 documentation and CAA assessment results can be found on the CAA airspace portal.

By CAA policy and process (CAP 1616), this ACP not only sets out to provide opportunity for open and transparent engagement to address the State requirement over the English Channel, but also to improve and develop an airspace environment that better considers the requirement of all air users. To this end, two of those options proposed represent potential opportunities not currently available under AIC 085/2022. One option in particular, option 1B, provides opportunity to transit the proposed DA under a crossing service to be provided by an air traffic control unit.

At significant internal expense, Bristow undertook lengthy and in-depth evaluation of both UAS and EC technology as part of legacy trial operations conducted in North Wales. Trial reports and outputs can be viewed here [Airspace change proposal public view \(caa.co.uk\)](#). We worked closely with the local GA community, the MoD and other air users to assess and evidence novel technology solutions to the UK regulator in an effort to provide options beyond airspace segregation for BVLOS UAS flight. To date and as discussed in our stakeholder engagement documents, no novel solution or detect and avoid system has yet been certified by the CAA for use and is therefore not included in this proposal. Bristow UAS operating in the Channel are currently outfitted with MODE S and ADSB.





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Should you have any further comments or feedback on those options proposed or indeed have any alternative suggestions we would be happy to discuss.

Kind Regards,

**Bristow Search & Rescue**

Dyce Avenue  
Dyce, Aberdeen  
AB21 0LQ



*Global Leader in Vertical Flight.*

---

**From:** [REDACTED]  
**Sent:** 07 January 2023 10:57  
**To:** Airspace Change Proposal <airspacechangeproposal@bristowgroup.com>  
**Subject:** Airspace Proposal Options

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---

Dear Sir or Madam

I have read through your document regarding the use of UAVs in the Channel area

Whilst I fully understand the requirement these options impose, I feel that they aren't helpful and may reduce safety of light general aviation to an unacceptable level. As such I wish to register my objections to all of your proposed options and recommend that you engage with the experts in our representative organisations. This document is limited in its scope, as we have seen in other proposals. However we need to look at airspace as a whole i.e. how aircraft transition from one part of the UK to another – this is missing in your proposals.

All of the options restrict use of the airspace which is against current CAA policy. It may seem that we have options to fly above the Danger Area in option 2 but as you can see from a SkyDemon trace of a flight I took to Le Touquet that was affected by lowering cloud, this flight would have led to an infringement in the western sector. Your solution to provide 2 light aircraft routes is impractical as it would funnel aircraft into extremely narrow routes for specific routes; it takes no account of aircraft flying from the IOW or the SW of England, as I did from Devon. Your recommended routes would potentially add significantly to the length of the flight and to the fuel usage and cost. Are you aware that some pilots attend events in Northern France and Belgium for historic aircraft that have limited range?



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You will also be aware of the loss in 2022 of a PA28 that crashed in the Channel due, it is believed, to being caught in a snow storm mid-Channel, with the top of the UAV area suggested as a contributory cause amongst GA pilots. In discussions with others, we considered the prospect of being reported for an infringement, even to save life, might prevent us from descending below weather, as I did on the trace attached. Others said they would descend in any case and argue about it later.

I am very strongly opposed to this proposal as it would seem that it is quite simplistic, designed to make Bristow's life easier at GA's expense, whilst at the same time inconveniencing light GA and reducing safe flight – your own SWOT analysis makes this clear.

As I understand it, the CAA is not in favour of a long-term policy of segregated airspace, and that the future lies in UAVs having sense and avoid capability. Many of us have, at great expense, followed guidance from the CAA to equip with Mode S, and some of us use ADSB-out with SkyEcho 2, so we have done our bit to improve our visibility to assist the drone industry. To be brutally frank, it is about time the industry should meet their side of the bargain. After all you are making a commercial decision that the business is likely to profit from Govt contracts. Would it be unreasonable for us to expect you to put some effort into the 'sense and avoid' part of the requirement?

At the moment there is a host of drone proposals around the country and a very large expenditure to support this. It would be good if some of this could be used to assist low-end General Aviation.

Yours faithfully

[Redacted signature]

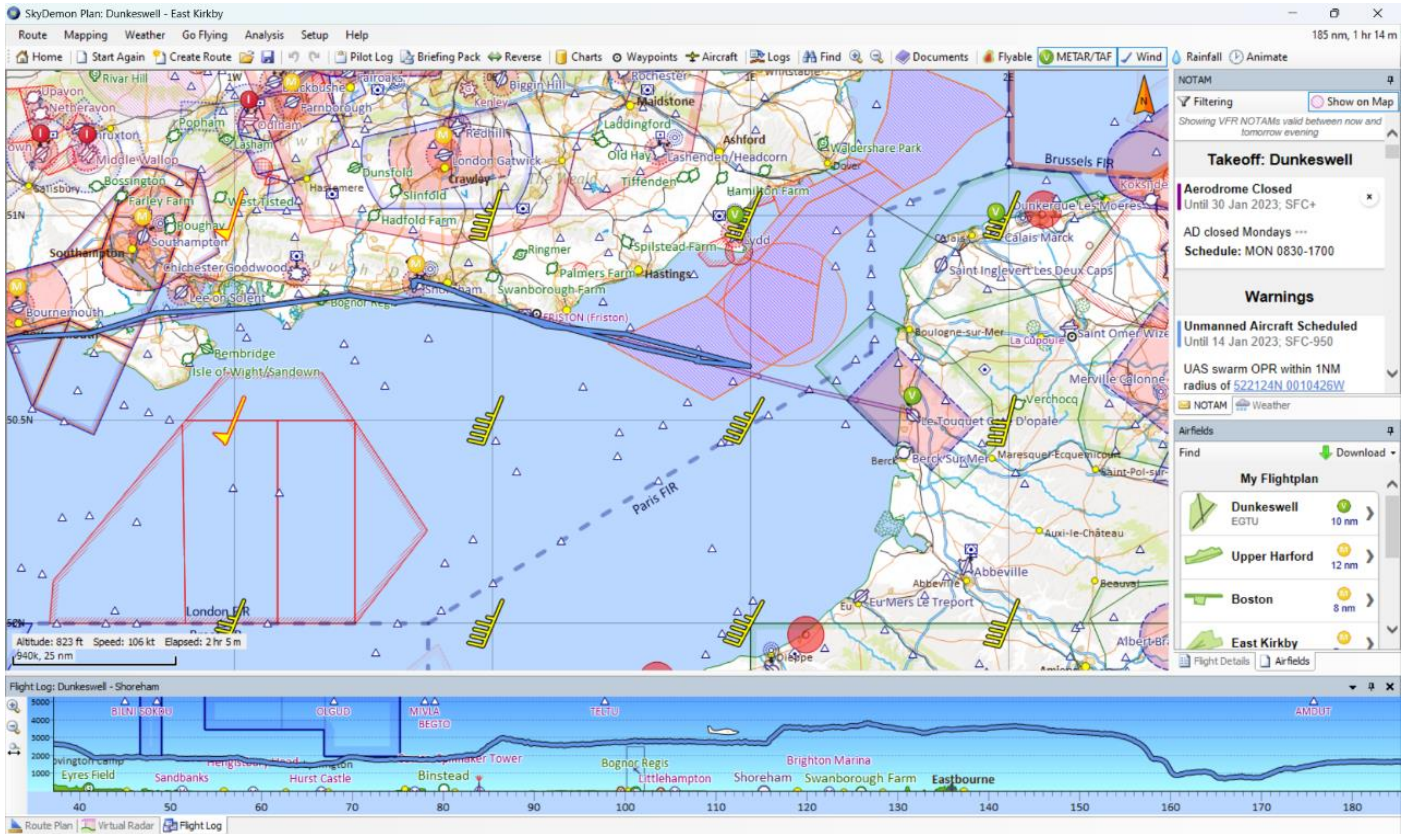
[Redacted contact information]



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**Bristow**  
Search and Rescue





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44529 – [REDACTED]

Date	Summary of Engagement	Method	Remarks
24 Jan 23	Feedback on initial airspace design options.	Email	
26 Jan 23	Response to feedback	Email.	

---

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

**Sent:** 26 January 2023 13:00

**To:** [REDACTED]

**Subject:** Re: ACP 2021-088 stage 2A

Good Afternoon [REDACTED],

Thank you for your feedback.

Best Regards,

[REDACTED]

---

**From:** [REDACTED]

**Sent:** 24 January 2023 15:54

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

**Subject:** ACP 2021-088 stage 2A

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---

Dear Sirs

As a PPL occasionally crossing the channel VFR I wish to comment on the options.

I believe the only acceptable option is 1B with DAAIS and DACS. The other options (including 1B with only DAAIS and not DACS) are too prejudicial not just to the interests of GA but to the safety of GA.

The pros and cons of the various options are well presented in the document.





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Regards





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14352 – [REDACTED]

Date	Summary of Engagement	Method	Remarks
28 Jan 23	Feedback on initial airspace design options.	Email	
30 Jan 23	Response to feedback	Email.	
6 Feb 23	Response to query for more information.	Email.	
8 Feb 23	Request for clarification on cross channel traffic.	Email.	
9 Feb 23	Response to query for more information.	Email.	

**From:** [REDACTED]  
**Sent:** 09 February 2023 20:58  
**To:** Airspace Change Proposal <airspacechangeproposal@bristowgroup.com>  
**Subject:** Re: Airspace Change Proposal 2021-088

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

Hello

Yes the GA community with light aircraft regularly cross the channel, and also non crossing traffic would be adversely affected by your proposals.

Rgds

[REDACTED]

On Wed, 8 Feb 2023 at 08:33, Airspace Change Proposal <[airspacechangeproposal@bristowgroup.com](mailto:airspacechangeproposal@bristowgroup.com)> wrote:

Good Morning [REDACTED]

Thank you, we were specifically interested in any details cross channel traffic that you could share with us?

Best Regards,





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**From:** [REDACTED]  
**Sent:** 06 February 2023 21:09  
**To:** Airspace Change Proposal <[airspacechangeproposal@bristowgroup.com](mailto:airspacechangeproposal@bristowgroup.com)>  
**Subject:** Re: Airspace Change Proposal 2021-088

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Hello

I think that my previous comments are quite clear and I am puzzled why you ask for further explanation.

However, quite simply, your ACP proposal is to effectively control and block a huge swathe of airspace for your operations of surveillance aircraft and / or UAVs. To facilitate fair usage of this airspace for all other air traffic you should provide a minimum of DAAIS and DACS with radar surveillance with dedicated VHF radio service.

Regards

---

**From:** Airspace Change Proposal <[airspacechangeproposal@bristowgroup.com](mailto:airspacechangeproposal@bristowgroup.com)>  
**Sent:** 30 January 2023 12:09  
**To:** [REDACTED]  
**Cc:** Airspace Change Proposal <[airspacechangeproposal@bristowgroup.com](mailto:airspacechangeproposal@bristowgroup.com)>  
**Subject:** Re: Airspace Change Proposal 2021-088

Good Afternoon [REDACTED]

Thank you for your feedback. Are you able to expand on your statement below as we would be interested to understand this in more detail:

"A dedicated Radar service and Radio service to ensure safe separation from your proposed UAV operations and indeed all other Cross Channel airtraffic, which incidentally I believe you have underestimated in your published documents".

Best regards,

---

**From:** [REDACTED]  
**Sent:** 28 January 2023 18:16



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**To:** Airspace Change Proposal <airspacechangeproposal@bristowgroup.com>  
**Subject:** Airspace Change Proposal 2021-088

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Hello

I wish to comment on this ACP proposal as a Pilot and owner of a Light GA aircraft based in Sussex.

The very minimum acceptable expectation is for enhanced safety for **All Airspace users**. The only option that comes near this in your proposal is to have a Danger Area Activity Information Service and Danger Area Crossing service . A dedicated Radar service and Radio service to ensure safe separation from your proposed UAV operations and indeed all other Cross Channel airtraffic , which incidentally I believe you have underestimated in your published documents.

Regards

██████████





Annex A – Identified stakeholders included as part of Stage 2A engagement.

Stakeholder Unique ID	Stakeholder
64253	2Excel Aviation
35467	AEM Limited
87999	Aero Legends
67463	Air Search
14585	Aircraft Owners and Pilots Association (AOPA)
27633	Airport Operators Association (AOA)
72792	Airspace Change Organising Group (ACOG)
33717	Airspace4All
16214	Association of Remotely Piloted Aircraft Systems UK (ARPAS-UK)
34444	Atlantic Bridge Aviation Ltd
09583	Av Man Engineering Ltd
24830	Aviation Environment Federation (AEF)
66847	BAe Systems
69630	Barnham's Mill Farm / Egerton Airstrip (Kent Microlight Club)
68979	BCAA - Belgium Civil Aviation Authority
31348	Biggin Hill Airport
70609	Blackbushe Airfield
67464	Bonnington Airfield
70738	Bristow Helicopters Limited
44221	British Airline Pilots Association (BALPA)
68705	British Airways (BA)
52556	British Balloon and Airship Club
80206	British Business and General Aviation Association (BBGA)
89283	British Gliding Association (BGA)
15601	British Hang Gliding and Paragliding Association (BHPA)
03548	British Helicopter Association (BHA)
25256	British Microlight Aircraft Association (BMAA)
30521	British Model Flying Association (BMFA)
44450	British Skydiving
28745	Challock Airfield
73525	Channel Gliding Club
78175	Chichester/Goodwood Aerodrome
67462	Clipgate Airfield



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67342	██████████
46571	Coldharbour Farm Airfield (Kent Microlight Club)
09090	Cristal Air
39257	Deanland Airfield
64565	DGAC - Directorate General for Civil Aviation
88898	Dover and Folkestone Hang Gliding Club
81860	Drone Major
89916	Dungeness Power Station
98078	Eagle Aero Maintenance
09876	Eastchurch Airfield
57733	Fairoaks Airport
67465	Farthing Corner Airfield
24324	Fighter Collection - Chief Pilot
23124	Flight Sport Aviation
67468	Flying Farmers Association
70102	General Aviation Alliance (GAA)
98343	Greenwood Farm Airstrip
10915	Guild of Air Traffic Control Officers (GATCO)
24354	Haffenden Aviation
20188	Hamilton Farm Airfield
58503	Harringe Airstrip (Kent Microlight Club)
09080	Hayward & Green
43283	Heavy Airlines
90425	Helicopter Club of Great Britain (HCGB)
26419	Home Office - Clandestine Channel Threat Command (CCTC)
76543	Home Office - Kent Police
11232	Honourable Company of Air Pilots (HCAP)
67456	██████████
08160	Iprosurv
54637	Isle of Man CAA
87674	██████████
23434	██████████
74793	Kent County Council
96785	Kent Wildlife Trust
23765	Kittyhawk Aerodrome
12673	Lashenden/Headcorn Aerodrome
43256	Light Aircraft Association (LAA)
64082	London Gatwick Airport



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60020	London Luton
03375	London Southend airport
33608	Low Fare Airlines
87687	Lowden Airstrip - Thorson Estates
67458	Lukesfield Airfield
36789	Lydd Aero Club
15662	Lydd London Ashford Airport
96884	Manston International Airport
95247	Maritime and Coastguard Agency (MCA)
44529	[REDACTED]
54209	[REDACTED]
67878	[REDACTED]
39283	Ministry of Defence - Defence Airspace and Air Traffic Management (MoD DAATM)
45375	Ministry of Defence - Royal Navy Command HQ
11884	MP for Folkestone and Hythe
56886	National Air Traffic Service (NATS)
98764	National Police Air Service
89876	National Trust
24966	Natural England
55665	[REDACTED]
24234	[REDACTED]
43243	Nordic Unmanned
67461	Old Hay Airfield
12342	Oysterair
67872	Pafra Flying Club
99006	Pent Farm Airfield
45635	[REDACTED]
11234	[REDACTED]
14352	[REDACTED]
17445	PPL/IR (Europe)
74645	Redhill Aerodrome
68663	Ripple / Deal Airfield Operator
00001	[REDACTED]
67457	[REDACTED]
67460	[REDACTED]
55669	[REDACTED]
73654	[REDACTED]



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91358	Rochester Airport
12654	Romney Marsh Countryside Partnership
98877	Royal Society for the Protection of Birds (RSPB)
95117	RVL Group
89890	SaxonAir
93939	Shoreham/Brighton City Airport
18698	Spilsted Airfield
79863	Stanstead Airport
57467	Strictly Flying.com
83929	Summit Aviation
62369	Swanborough Farm strip
48297	Tekever
76756	The Wing Walk Company
11111	Thurston Helicopters
47027	Tiffenden Airfield
34535	██████████
35435	██████████
67459	Udimore Airstrip ( N50 56 33, E 00 41 20)
00905	UK Airprox Board (UKAB)
80171	UK Flight Safety Committee (UKFSC)
74920	United States Air Force Europe (3rd Air Force-Directorate of Flying (USAFE (3rd AF-DOF))
67467	Unknown Airfield
32682	Vintage Aero
19367	Witherenden Airfield
67466	Witherenden Microlight Club
76283	Woodchurch Airfield



Annex B – Stakeholders removed from engagement.

Stakeholder Unique ID	Stakeholder	Remarks
40942	Airfield Operators Group (AOG)	Removed from stakeholder list 19 Jan 23, following receipt of email dated 16 Jan 23 from [REDACTED].
75344	Deal (Ripple) Airstrip	21 Nov 22: Duplicate of 68663 - Ripple Airfield
91786	Home Office - Border Force	Removed from stakeholder list following receipt of email dated 22 Nov [REDACTED] BFBPS [REDACTED]
99999	Kent Surrey & Sussex Air Ambulance	Removed from stakeholder list 19 Jan 23, following receipt of email dated 17 Jan 23 from [REDACTED].
64860	London Heathrow Airport	Removed from stakeholder list following receipt of email dated 9 Jan 23, from [REDACTED]
22650	Maritime and Coastguard Agency (MCA) - Dover Maritime Rescue & Coordination Centre	Removed from stakeholder list as MCA has responsibility.
90976	Maypole Airfield	Airfield Closed Jan 2021.
18703	Ministry of Defence - Hythe Ranges	Removed from stakeholder list as MOD - DAATM has responsibility on behalf of MOD.
64895	Ministry of Defence - Lydd Ranges	Removed from stakeholder list as MOD - DAATM has responsibility on behalf of MOD.
13445	Ministry of Defence - Military Aviation Authority (MAA)	Removed from stakeholder list as MOD - DAATM has responsibility on behalf of MOD.



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## Annex C – ACP-2021-088 - Stage 2 Email

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

**Sent:** 21 December 2022 19:16

**To:**

**Subject:** ACP-2021-088 - Stage 2

Dear Stakeholder,

We are writing to you today to let you know that we successfully passed the Stage 1 gateway for ACP-2021-088, consequently we have progressed to Stage 2 - Develop & Assess. The initial stage (Stage - 2A) involves the development of airspace options, which are tested with you, our stakeholders.

Consequently, several options have been developed, and we would like to preliminarily test these options with you to ensure that you are satisfied that the design options align with the design principles and that we as the change sponsor have understood and accounted for your concerns within the design options. These options are set out within the attached presentation and PDF.

We would welcome your feedback on each of the design options and have included a feedback form to aid this, though we are happy to receive feedback in any appropriate formats. Any feedback needs to be returned to us at [airspacechangeproposal@bhlgrou.com](mailto:airspacechangeproposal@bhlgrou.com) by the 30 January 2023.

Further details of the proposal can be found at [Airspace change portal \(caa.co.uk\)](https://caa.co.uk), then selecting 'search by Airspace Change ID' and entering ACP reference ACP-2021-088.

Guidance relating to the Airspace Change Proposal and the process we are required to follow by the CAA can be found at <https://airspacechange.caa.co.uk/about-airspace-change/> and specifically CAP1616.

If you no longer wish to be included in further communications regarding this ACP, please reply to this email with 'STOP' in the subject and you will be removed from the stakeholder list.

We look forward to your feedback and continued engagement in this process.

Kind Regards,

**Bristow Search & Rescue**

Dyce Avenue

Dyce, Aberdeen



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Annex D – ACP-2021-088 - Stage 2A Design Options





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ACP 2021-088

Stage 2A – Develop Airspace

Change Options

21 December 2022





## Contents

- Introduction
- Constraints and Assumptions
- Statement of Need
- Defined Design Principles (Stage 1)
- List of Options
- Design Options Development
- Summary
- Next Steps
- Point of Contact



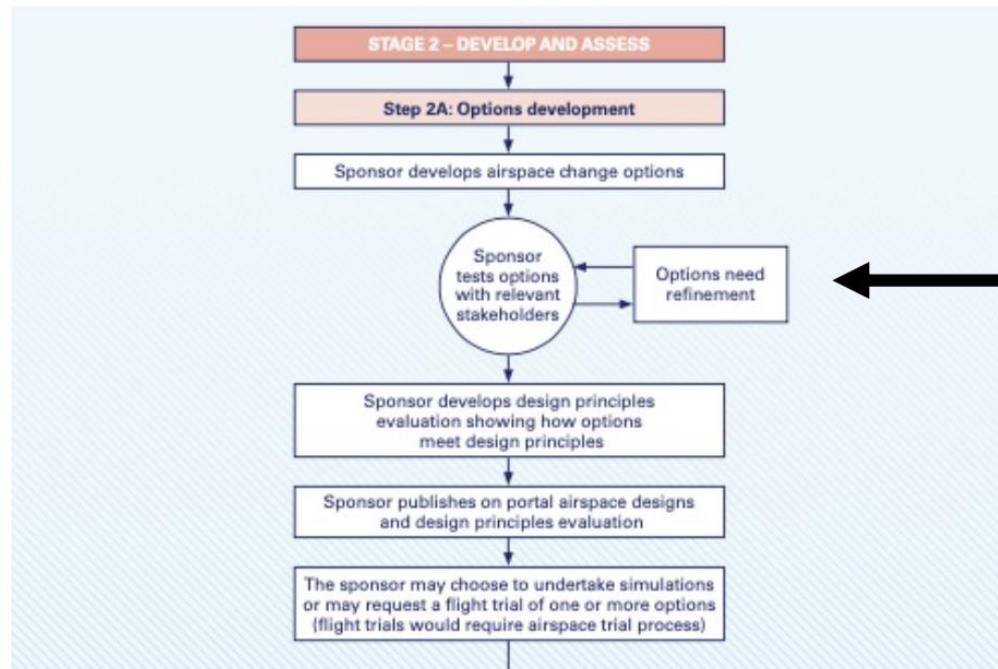
## Introduction

- ACP-008-2021 is sponsored by Bristow on behalf of the Maritime and Coastguard Agency (MCA).
- The ACP aims to deliver a suitable airspace construct, to enable Uncrewed Aircraft Systems (UAS) operations to support HM Coastguard and the wider UK Government response to small boat crossings of the English Channel.
- Stage 1 – Design Principles, was successfully passed at the CAA gateway on the 25 Nov 22.
- We have now entered Stage 2 during which the initial airspace change design options are developed.



## Introduction...

- CAP 1616



← We are here



## Introduction...

### Purpose

- Progress against Stage 2A – Options Development. (CAP1616, dated Mar 21, Pg 39, Para 125):
  - We have developed a first comprehensive list of options, to the extent that a list is possible, that address the Statement of Need and that align with the design principles from Stage 1.
- Next Step against Stage 2A – Options Development.
  - We would like to preliminarily test these options with you to ensure that you are satisfied that the design options are aligned with the design principles and that we as the change sponsor have understood and accounted for your concerns specifically related to the design options.
  - We would welcome your feedback on each of the design options set out within this presentation and have included a feedback form to aid this, though we are happy to receive feedback in any appropriate formats. Any feedback can be returned to: [airspacechangeproposal@bristowgroup.com](mailto:airspacechangeproposal@bristowgroup.com)



## Introduction...

### **CAP 1616: Stage 2 – Develop & Assess**

Stage 2A – Options Development. (CAP1616, dated Mar 21, Pg 39, Para 125), requires the change sponsor to:

- develop a first comprehensive list of options, to the extent that a list is possible, that address the Statement of Need and that align with the design principles from Stage 1.
- preliminarily test these with the same stakeholders it engaged with in Step 1B to ensure that they are satisfied that the design options are aligned with the design principles and that the change sponsor has properly understood and accounted for stakeholder concerns specifically related to the design options.
- produces a design principal evaluation that sets out how its design options have responded to the design principles.



## Introduction...

### Purpose

- Progress against Stage 2A – Options Development. (CAP1616, dated Mar 21, Pg 39, Para 125):
  - We have developed a first comprehensive list of options, to the extent that a list is possible, that address the Statement of Need and that align with the design principles from Stage 1.
- Next Step against Stage 2A – Options Development.
  - We would like to preliminarily test these options with you to ensure that you are satisfied that the design options are aligned with the design principles and that we as the change sponsor have understood and accounted for your concerns specifically related to the design options.
  - We would welcome your feedback on each of the design options set out within this presentation and have included a feedback form to aid this, though we are happy to receive feedback in any appropriate formats. Any feedback can be returned to: [airspacechangeproposal@bristowgroup.com](mailto:airspacechangeproposal@bristowgroup.com)



## Constraints and Assumptions

- UAS activity within the English Channel is directed by the Maritime and Coastguard Agency (MCA), and the Home Office. The purpose of which is to identify all small boats in the Dover Strait to ensure that they are interdicted and triaged for Safety of Life at Sea (SOLAS) responses; collect evidential footage of criminality to support the criminal justice process; and to ensure that law enforcement activity can be conducted safely.
- The UAS activity is likely to continue at current levels for the foreseeable future, due to the ongoing operational requirements of the migrant response, on which the statement of need is based.
- UK Government operational requirement until 2027 and therefore perceived lifespan until 2027.
- The lateral dimensions of TDA D098 are deemed appropriate and necessary for the airspace volume required to enable Government directed UAS activity, to meet the statement of need.
  - The Eastern lateral boundary of TDA D098 runs along the international airspace boundary and therefore remains extant.
- The vertical dimensions of TDA D098 are deemed appropriate and necessary for any airspace volume required to enable Government directed UAS activity, to meet the statement of need. These are based on technical sensor and command and control limitations of the UAS being operated with a small safety buffer. Therefore, any reduction of these ceilings is likely to preclude the use of one of the UAS platforms, which would not meet the statement of need.
- The continued extension of TDA D098 is non-viable due to CAA regulatory and policy requirements.





## Constraints and Assumptions

- The airspace baseline is that of the airspace environment pre-Temporary Danger Area (TDA) D098, which is based on Class G airspace (described in detail within Option 0 – Baseline).
  - 2019 used to inform the airspace baseline, as it provided the most recent year where air traffic was not effected by Covid 19.
- No detect and avoid capability has been approved by the CAA to enable a non-segregated airspace (Class G) option; therefore, non-segregated airspace options cannot be considered due to regulatory and policy constraints.
- At the current time the requirement is for a segregated airspace environment to enable Beyond Visual Line of Sight UAS operations. We continue to explore and consider novel airspace management solutions, such as Transponder Mandated Zones (TMZ) and Electronic Conspicuity (EC) solutions; however, as these are not currently approved by CAA regulatory and policy frameworks, these have been ruled out as non-viable within the timeframe of this ACP process.



## Constraints and Assumptions

- Novel concepts constraints such as a Transponder Mandated Zone (TMZ) were considered as an option, as suggested by several stakeholders in Stage 1. However, a TMZ construct was ruled out as it is currently unviable within the current CAA regulation and airspace policy:
  - Para 2.1.2 of CAP 722 Beyond visual line of sight operations (BVLOS) states: Unmanned aircraft intended for BVLOS operations will require either:
    - *A block of airspace to operate in which the unmanned aircraft is 'segregated' from other aircraft - because other aircraft are not permitted to enter this airspace block, the unmanned aircraft can operate without the risk of collision, or the need for other collision avoidance capabilities; or*
    - *A technical capability which has been accepted as being at least equivalent to the ability of a pilot of a manned aircraft to 'see and avoid' potential conflicts. This is referred to as a Detect and Avoid (DAA) capability. Further details regarding DAA can be found at 3.6; Note: Any DAA capability would be expected to ensure compliance with Regulation (EU) 923/2012 the Standardised European Rules of the Air (SERA) chapter 2 (avoidance of collisions), as adjusted by Rule 8 of the Rules of the Air Regulations 2015 (Rules for avoiding aerial collisions);*
  - No CAA approved detect and avoid capability that complies with Regulation (EU) 923/2012 the Standardised European Rules of the Air (SERA) chapter 2 (avoidance of collisions), as adjusted by Rule 8 of the Rules of the Air Regulations 2015 (Rules for avoiding aerial collisions), current exists nor forecast within the lifespan of this ACP. **TMZ is therefore deemed unviable and cannot be progressed.**



## Statement of Need

- An Airspace Change Proposal to facilitate long-term UAS Beyond Visual Line Of Sight (BVLOS) operations in the vicinity of the English Channel. Routine HM Coastguard patrols are required to support Search and Rescue taskings in the region as a result of the increasing demand on emergency services responding to migrant crossings.
- As part of UK Government's response, The Department for Transport (DfT) has been requested to expand routine situational awareness (SA) patrols of the English Channel due to the increased levels of migrant crossings which regularly result in Search and Rescue operations responding to multiple '999' calls. Based on the intelligence from the UAS, His Majesty's Coastguard (HMCG) decision makers can ascertain the scale and accurate location of an incident and mobilise the appropriate assets to attend.
- Deploying Bristow's UAV for SA patrols and safety overwatch in the English Channel and provides operational staff at HM Coastguard with vital intelligence, which can be shared with other emergency services, UK Gov departments and local organisations, to ensure effective deployment of air, sea and ground resources. This also preserves UK SAR helicopter (SAR(H) assets to be used for their primary life-saving rescue function.
- Due to the enduring nature of this requirement, a viable solution to replace the current English Channel temporary danger area (TDA) complex is needed to continue to support the UK's response to the current migrant issue.
- The statement of need can be found: <http://airspacechange.caa.co.uk/PublicProposalArea?pID-418>



## Defined Design Principles (6)

Priority	Category (CAP1616)	Design Principle
1	Safety	Maintain or enhance current levels of safety.
2	Operational / Technical	Consider the requirements of all potential users.
3	Operational / Economic	Minimise the impact on other airspace users.
4	Policy / regulatory	Comply with UAS regulatory framework.
5	Operational / Technical	Operating area to be located over the sea.
6	Environmental / Operational	Minimise the noise and environmental impact on areas affected by the proposed change.



## List of Options

The following airspace change design options may provide suitable airspace volumes that meet the requirements set out within the Statement of Need v2 (ACP-088-2021, dated 28 Jan 22).

- Option 0 – Baseline / Do nothing.
- Option 1 – Permanent Danger Area.
- Option 2 – Permanent Danger Area with an access corridor.



## List of Options

Considered Options	Description
Option 0 – Baseline / Do nothing.	The airspace environment that existed prior to the existence of the Temporary Danger Area (TDA) complex D098, based on Class G airspace.
Option 1 – Permanent Danger Area.	The transition of the current Temporary Danger Area (TDA) into a permanent Danger Area with a variety of airspace management constructs: 1A – DAAIS only. 1B – DAAIS and DACS.
Option 2 – Permanent Danger Area with an access corridor.	The transition of the current Temporary Danger Area (TDA) into a permanent Danger Area with an "open" corridor to enable transit of other air users.



## Option 0 - Airspace Baseline / Do Nothing

- Description:
  - The baseline of the airspace construct to be used for this airspace change proposal is the airspace environment that existed prior to the existence of the Temporary Danger Area (TDA) complex D098.
  - A series of Controlled Airspace (CTA) structures are in existence (slide 19) with the lowest starting at Flight Level 5500ft. Below this is Class G airspace which is the focus of this ACP.
  - This airspace environment has been defined as Class G airspace, the Dungeness Restricted Area of over Dungeness Power Station, Dover Port Restricted Flying Zone, and the Lydd and Hythe Ranges Danger Areas.
  - It is this airspace environment that will form the baseline to be used to assess the impacts of the airspace options moving forward into Stage 2B.
  - It does not include the TDA D098 complex that has been in existence for approximately 2 years and has been extended on a rolling basis at the discretion of the CAA to meet UK Government requirements.
- Scope & Size:
  - No Temporary Danger Area.



## Option 0 - Airspace Baseline / Do Nothing

- Airspace management:
  - Class G airspace requirements only.
  - No option to utilise novel technology as part of this proposal, such as a Detect and Avoid / See and Avoid capability, that is approved by the CAA.
- Usage
  - 2019 used to inform the airspace baseline, as it provided the most recent year where air traffic was not affected by Covid 19.
  - Air traffic within Class G is unpredictable in nature due to its unmonitored status and the freedom for air users to use it unconstrained. However, we have sought to capture the air traffic using a variety of sources.
  - It is estimated by extrapolation that 844 movements to/from foreign airfields arriving/departing from Lydd out of the [non-local] 6095 movements (these exclude local flights and touch-and go) to/from 247 different international and domestic aerodromes. By comparison, the annual total of all movements at Lydd including the local flights/circuit training etc. will be just under 29,000 for 2022.





## Option 0 - Airspace Baseline / Do Nothing

- Regarding non-landing transits/overflights through the Lydd Airport Airspace and receiving a service from Lydd APP, the annual total for 2019 was 2245. If we therefore estimate that for the NW/SE transits to/from UK to N France and thereby crossing the ACP area of interest would be 50% of the total circa. 1123. The 2022 total figure is likely to be just above 2000, which equates to a 10% drop in GA transits, despite the Airport's movements/activity increasing by over 9% over the same period.
- The estimated total number of General Aviation (GA) flights crossing the English Channel GA and working Lydd APP is approx. 1844pa. This figure does not include the drones and SAR(H), AW159 and other Govt sponsored assets in the TDAs. NB this figure does not include traffic working London FIR.
- The bulk of the transits occur between 1000 and 1700L, (limited as they are by the opening and closing times of their base aerodromes) and in the summer, most go across at 2000-5500ft, with only a handful of (mainly) light helicopters wanting lower. Lydd Airport arrivals and departures from/to the SE seem to just about manage to clear the 1500ft TDA ceiling without having to do an overhead departure or unusual join.

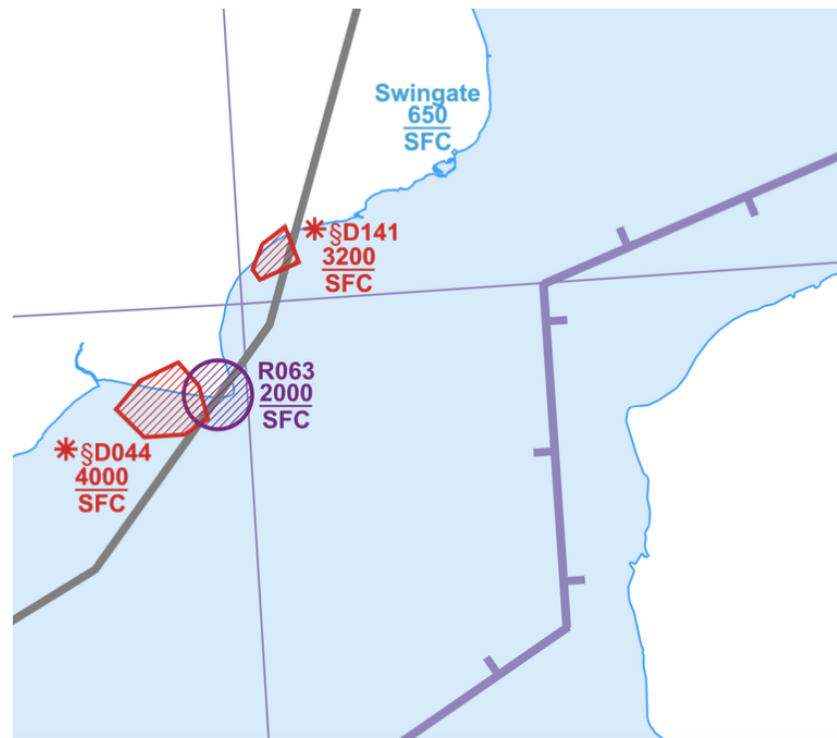


## Option 0 - Airspace Baseline / Do Nothing

- Since the existence of the TDA, Lydd Airport have had no emergency traffic needing descent into the TDA and only a couple of infringements.
- Outside of Lydd operating hours (0830-1900) there is very little cross-channel GA activity.
- General Aviation traffic would most likely route directly from their point of departure to their point of destination, using either VFR or IFR methods dependent on prevailing conditions and their operating approvals.



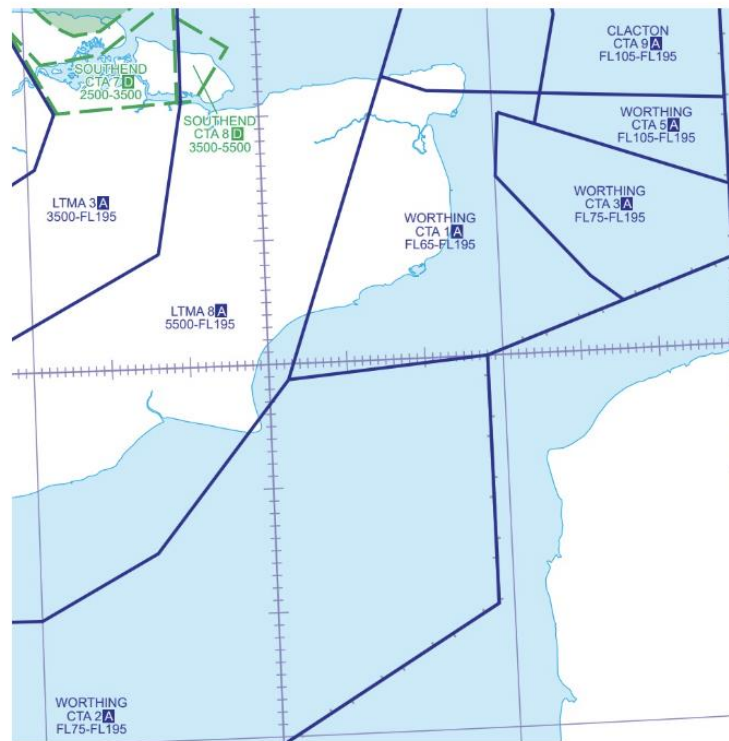
## Option 0 - Airspace Baseline / Do Nothing: General Geographical Representation



- Class G airspace below CTAs.
- International boundary with EU - Purple.
- Danger Areas – Red.
  - Lydd Ranges
  - Hythe Ranges
- Restricted Area - Purple Circle.
  - Dungeness Power Station.
- Restricted Area - light blue.
  - Dover Port



## Option 0 - Airspace Baseline / Do Nothing: Airspace Representation



- Controlled Areas (CTA) with Class G below.



## Option 0 - Airspace Baseline / Do Nothing: SWOT

	Helpful (to achieving objective)	Harmful (to achieving objective)
Internal (Organisation)	<p><b>Strengths</b></p> <ul style="list-style-type: none"> <li>Provides free access and use of airspace with little / no restrictions. (Class G).</li> </ul>	<p><b>Weaknesses</b></p> <ul style="list-style-type: none"> <li>Class G airspace would prevent UAS meeting the operational need and therefore the statement of need.</li> <li>Option inherently unsafe due to lack of the existence of a CAA approved DAA capability.</li> <li>Additional environmental impact due to manned asset use for UAS tasking.</li> </ul>
External (environment)	<p><b>Opportunities</b></p>	<p><b>Threats</b></p> <ul style="list-style-type: none"> <li>UAS operating in airspace volume does not have a DAA capability, therefore cannot comply with collision and detection requirements of Class G airspace.</li> <li>Does not align with UK UAS Regulatory Framework, as BVLoS UAS cannot operate outside of segregate airspace.</li> </ul>



## Option 0 - Airspace Baseline / Do Nothing – Alignment with Design Principles

Priority	Design Principle	Alignment	
1	Maintain or enhance current levels of safety.	UAS operating within airspace does not have a DAA capability that is certified by the CAA and can ensure safety of all air users. As such operation of UAS within Class G airspace would be unsafe, due to no collision detection and avoidance from UAS.	X
2	Consider the requirements of all potential users.	By converting the TDA into Class G, this would not meet the requirements of the UAS operators conducting searches and Safety of Life at Sea (SOLAS) tasking as part of the HMG small boat response. This is due to risk to life tasking taking priority over other air user traffic, and aerial searching requires a segregated volume of airspace, due to the defined flight profiles required, and the high workload of the operators involved.	X
3	Minimise the impact on other airspace users.	Class G airspace would eliminate the impact on other airspace users, but would also prevent activities to meet the statement of need.	✓



## Option 0 - Airspace Baseline / Do Nothing: Alignment with Design Principles

Priority	Design Principle	Alignment	
4	Comply with UAS regulatory framework.	Current UK UAS regulation restrict BVLOS UAS operation to DAs. This option therefore does not align with UK Regulatory Framework.	X
5	Operating area to be located over the sea.	This airspace change option is entirely over the sea within the English Channel and is therefore aligned with this Design Principle.	—
6	Minimise the noise and environmental impact on areas affected by the proposed change.	The use of UAS in preference to manned aviation to meet the requirements of the UK HMG small boat response, vastly reduces the environmental impact, due to the use of smaller aircraft and the corresponding smaller quantities of fuel expended.	—



## Option 0 - Airspace Baseline / Do Nothing: UAS Regulation and Policy

Para 2.1.3 of CAP 722 Beyond visual line of sight operations, states:

- Operation of an unmanned aircraft beyond a distance where the remote pilot is able to respond to or avoid other airspace users by direct visual means (i.e. the remote pilot's observation of the unmanned aircraft) is considered to be a BVLOS operation.
- Unmanned aircraft intended for BVLOS operations will require either:
  - A **technical** capability which has been accepted as being at least equivalent to the ability of a pilot of a manned aircraft to 'see and avoid' potential conflicts. This is referred to as a Detect and Avoid (DAA) capability. Further details regarding DAA can be found at 3.6.

**Note:**

- *Any DAA capability would be expected to comply with Regulation (EU) 923/2012 as retained (and amended in UK domestic law) under the European Union (Withdrawal) Act 2018: The Standardised European Rules of the Air (SERA) chapter 2 (avoidance of collisions), as adjusted by Rule 8 of the Rules of the Air Regulations 2015 (Rules for avoiding aerial collisions);*





## Option 0 - Airspace Baseline / Do Nothing: UAS Regulation and Policy

or

- An **operational** mitigation, which reduces the likelihood of encountering another aircraft to an acceptable level, which may be achieved either using airspace segregation, or another suitable method of ensuring such segregation.
- No CAA approved detect and avoid capability that complies with Regulation (EU) 923/2012 the Standardised European Rules of the Air (SERA) chapter 2 (avoidance of collisions), as adjusted by Rule 8 of the Rules of the Air Regulations 2015 (Rules for avoiding aerial collisions), current exists nor forecast within the lifespan of this ACP. **This option is therefore unviable and cannot be continued.**



## Design Option 1A – Permanent Danger Area with DAAIS

### Description:

- TDA complex D098 transitioned into a permanent Danger Area, with DAAIS.
- Permanent Danger Area rather than Temporary.

### Scope & Size:

- Geographic extent - The same lateral and vertical dimensions as TDA D098 complex (see next slide).

### Airspace management:

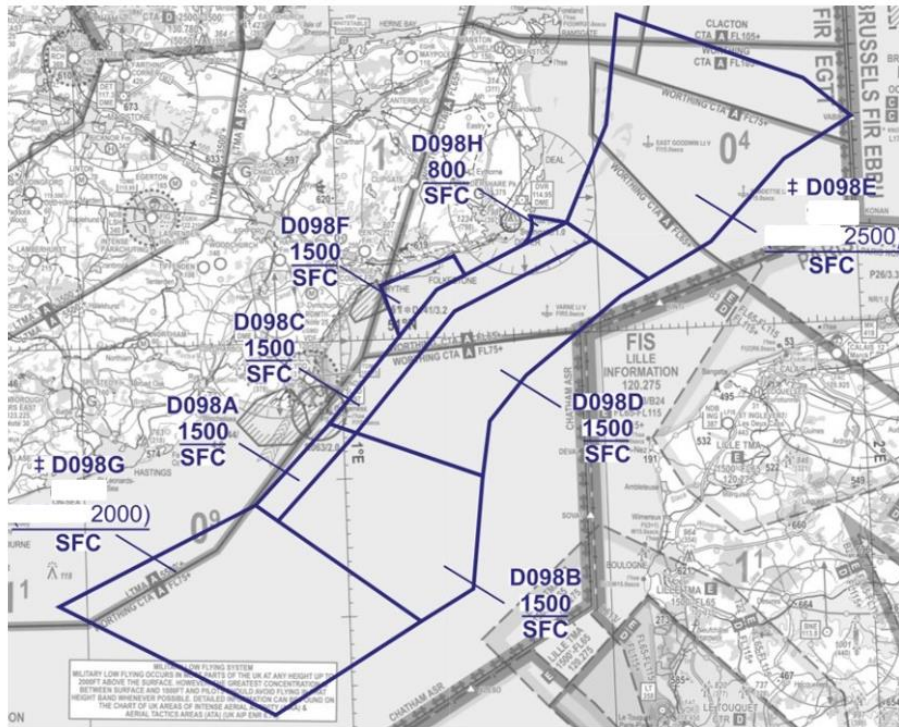
- Danger Area segregating UAS from other air users.
- Danger Area Activity Information Service (DAAIS) provided by London Information when the DA is active.
- No Danger Area Crossing Service (DACs).
- Internal deconfliction agreement for TDA users only.
- Danger area inactive when not required.
- Danger area reverted to pre-existing airspace (baseline) should no operational requirement exist.

### Activation:

- Up to 365 days per year.



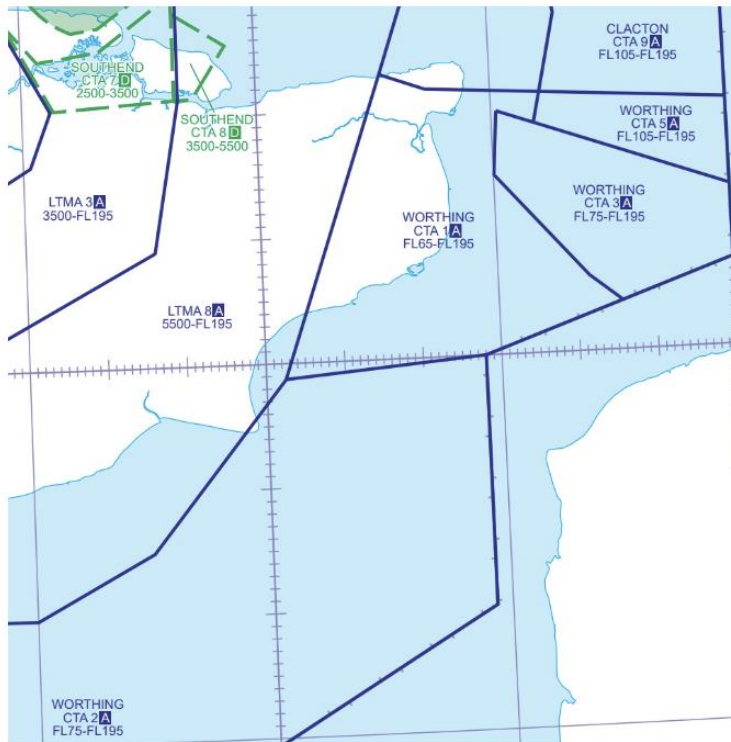
## Design Option 1A - Permanent Danger Area with DAAIS: General Geographical Representation



- Class G airspace below CTAs.
- International boundary with EU runs along eastern edge of TDA complex (purple)
- Danger Areas – Grey.
  - Lydd Ranges
  - Hythe Ranges
- Restricted Area - Grey.
  - Dungeness Power Station.
- Restricted Area - Grey.
  - Dover Port



## Design Option 1A - Permanent Danger Area with DAAIS: Airspace Representation



- Controlled Areas (CTA) with Class G below.



## Design Option 1A – SWOT

	Helpful (to achieving objective)	Harmful (to achieving objective)
Internal (Organisation)	<p><b>Strengths</b></p> <ul style="list-style-type: none"> <li>Meets the statement of need.</li> <li>Minimal impact on environment given the impact of manned alternatives for delivering operational requirement.</li> <li>Complies with CAA UAS regulations, for safe operations by segregating airspace.</li> <li>Complies with CAA airspace regulations, by creating permanent Danger Area rather than continually extending Temporary Danger Area.</li> </ul>	<p><b>Weaknesses</b></p> <ul style="list-style-type: none"> <li>Impacts other air users' requirements.</li> <li>Segregates a significant quantity of airspace from Surface to 1500/2000/2500 ft.</li> <li>Continues to restrict airspace access for General Aviation wishing to operate in the English Channel.</li> </ul>
External (environment)	<p><b>Opportunities</b></p> <ul style="list-style-type: none"> <li>Transparent CAP 1616 process, and appropriate engagement and consultation with stakeholders.</li> </ul>	<p><b>Threats</b></p> <ul style="list-style-type: none"> <li>Continues to restrict airspace access for General Aviation wishing to operate in the English Channel.</li> <li>Internal deconfliction for TDA users only.</li> <li>Airspace Management.</li> </ul>



## Design Option 1A – Alignment with Design Principles

Priority	Design Principle	Alignment	
1	Maintain or enhance current levels of safety.	This option maintains the current levels of safety, by the use of a DA to segregate UAS from other air users.	✓
2	Consider the requirements of all potential users.	As this option is based on the historical TDA established by the UK Government, this didn't consider the requirements of all potential users. Therefore, by default, neither will the transition to a DA without completing the full CAP1616.	✗
3	Minimise the impact on other airspace users.	Significant impact on General Aviation users who wish to transit the English Channel, at altitudes less than 1500ft i.e. under visual flight rules where visibility is reduced below 1500ft.	✗



## Design Option 1A – Alignment with Design Principles

Priority	Design Principle	Alignment	
4	Comply with UAS regulatory framework.	This option complies with existing UAS regulatory framework and airspace policy, due to establishing a permanent Danger Area to segregate UAS from other air users.	✓
5	Operating area to be located over the sea.	This airspace change option is entirely over the sea within the English Channel and is therefore aligned with this Design Principle.	—
6	Minimise the noise and environmental impact on areas affected by the proposed change.	The use of UAS in preference to manned aviation to meet the requirements of the UK HMG small boat response, vastly reduces the environmental impact, due to the use of smaller aircraft and the corresponding smaller quantities of fuel expended.	—



## Design Option 1A – Stakeholder Feedback

**We are looking for feedback and wish to understand how this option may impact you.**

Item	Question	Feedback
1	Do you agree with the initial assessment against the agreed Design Principles? If not please provide details?	
2	How would this option impact you?	
3	Do you have any alternative airspace construct suggestions that will meet the statement of need and align with Design Principles?	
4	Do you have any alternative airspace management suggestions that can be considered that will meet the statement of need and Design Principles?	
5	Free Text	





## Design Option 1B – Danger Area with DAAIS and DACS

### Description:

- TDA complex D098 transitioned into a permanent Danger Area, with DAAIS and DACS.
- Permanent Danger Area rather than Temporary.

### Scope & Size:

- Geographic extent - The same lateral and vertical dimensions as TDA D098 complex (see next slide).

### Airspace management:

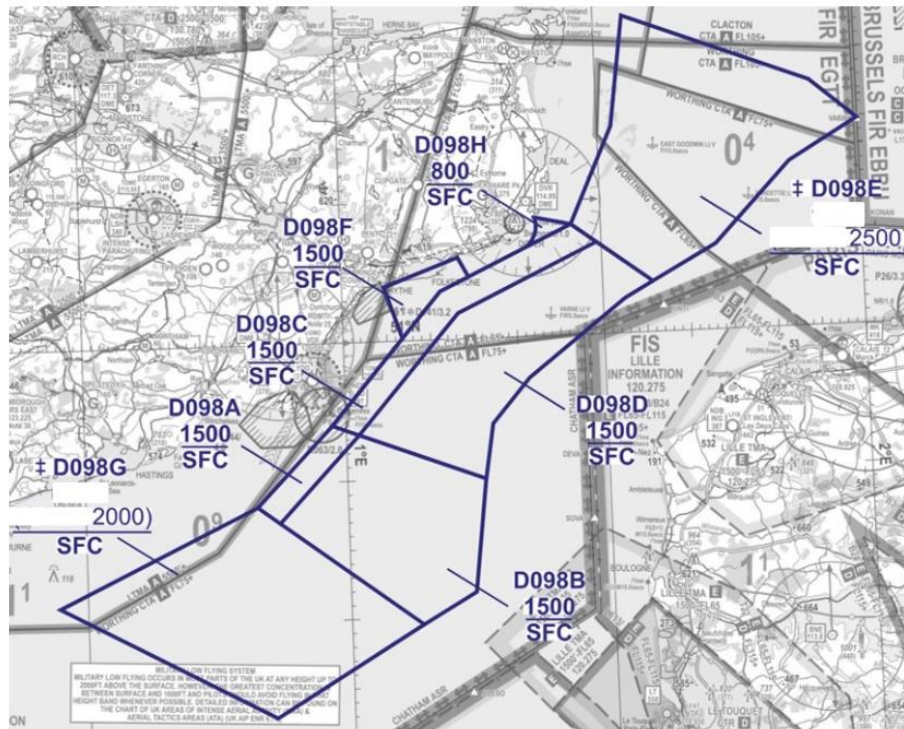
- Danger Area segregating UAS from other air users.
- Danger Area Activity Information Service (DAAIS) provided by London Information when the DA is active.
- Danger Area Crossing Service (DACs) provided during air traffic service provider opening hours and DA active.
- Internal deconfliction agreement for TDA users only.
- Danger Area inactive when not required.
- Danger Area reverted to pre-existing airspace (baseline) should no operational requirement exist.

### Activation:

- Up to 365 days per year.



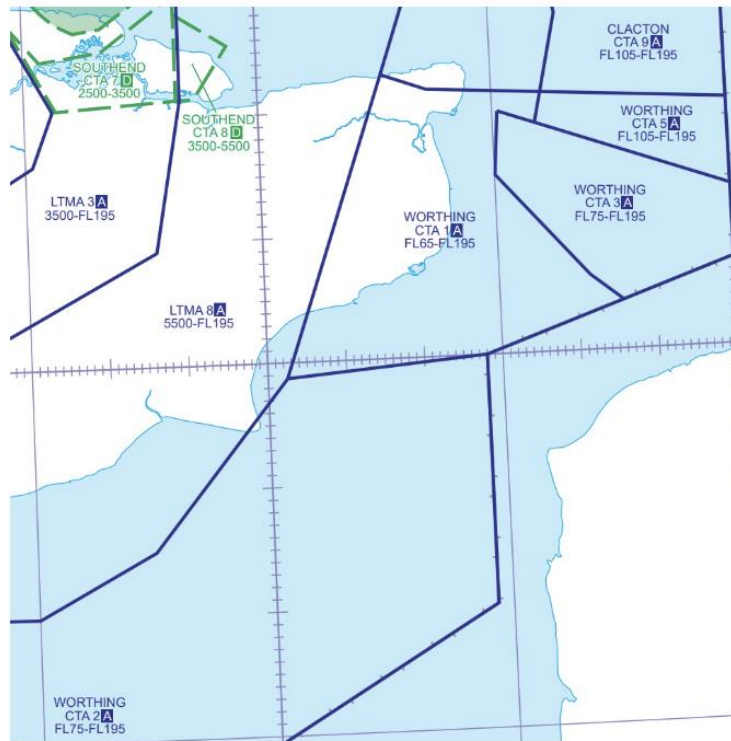
## Design Option 1B - Danger Area with DAAIS and DACS: General Geographical Representation



- Class G airspace below CTAs.
- International boundary with EU runs along eastern edge of TDA complex (purple)
- Danger Areas – Grey.
  - Lydd Ranges
  - Hythe Ranges
- Restricted Area - Grey.
  - Dungeness Power Station.
- Restricted Area - Grey.
  - Dover Port



## Design Option 1B - Danger Area with DAAIS and DACS: Airspace Representation



- Controlled Areas (CTA) with Class G below.



# Design Option 1B – SWOT

	Helpful (to achieving objective)	Harmful (to achieving objective)
Internal (Organisation)	<p><b>Strengths</b></p> <ul style="list-style-type: none"> <li>Meets the statement of need.</li> <li>Considers other airspace users' requirements, by providing a method to cross the Danger Area when active.</li> <li>Minimal impact on environment given the impact of manned alternatives for delivering operational requirement.</li> <li>Complies with CAA UAS regulations, for safe operations by segregating airspace.</li> </ul>	<p><b>Weaknesses</b></p> <ul style="list-style-type: none"> <li>Segregates a significant quantity of airspace from Surface to 1500/2000/2500 ft.</li> </ul>
External (environment)	<p><b>Opportunities</b></p> <ul style="list-style-type: none"> <li>Provides a route for General Aviation to cross the English Channel, enabling wider Airspace Access when the DA is active.</li> <li>Provides a certified air traffic control function during opening hours.</li> <li>Transparent CAP 1616 process, and appropriate engagement and consultation with stakeholders.</li> <li>Increased air safety.</li> </ul>	<p><b>Threats</b></p> <ul style="list-style-type: none"> <li>Continues to restrict airspace access for General Aviation wishing to operate in the English Channel.</li> </ul>



## Design Option 1B – Alignment with Design Principles

Priority	Design Principle	Alignment	
1	Maintain or enhance current levels of safety.	This option enhances the current levels of safety, by the use of a DA with DACS and DAAIS to manage safe crossings and movements within the active DA.	✓
2	Consider the requirements of all potential users.	The current volume of airspace (D098) currently meets the requirements for all potential users (UAS) when active.	✓
3	Minimise the impact on other airspace users.	Transitioning from a TDA to a DA, and enabling the transit of the DA via a DACS, this helps minimise the impact on other air users.	✓



## Design Option 1B – Alignment with Design Principles

Priority	Design Principle	Alignment	
4	Comply with UAS regulatory framework.	This option complies with existing UAS regulatory framework and airspace policy, due to establishing a permanent Danger Area to segregate UAS from other air users.	✓
5	Operating area to be located over the sea.	This airspace change option is entirely over the sea within the English Channel and is therefore aligned with this Design Principle.	—
6	Minimise the noise and environmental impact on areas affected by the proposed change.	The use of UAS in preference to manned aviation to meet the requirements of the UK HMG small boat response, vastly reduces the environmental impact, due to the use of smaller aircraft and the corresponding smaller quantities of fuel expended.	—



## Design Option 1B – Stakeholder Feedback

**We are looking for feedback and wish to understand how this option may impact you.**

Item	Question	Feedback
1	Do you agree with the initial assessment against the agreed Design Principles? If not please provide details?	
2	How would this option impact you?	
3	Do you have any alternative airspace construct suggestions that will meet the statement of need and align with Design Principles?	
4	Do you have any alternative airspace management suggestions that can be considered that will meet the statement of need and Design Principles?	
5	Free Text	



## Design Option 2 – Danger Area with Corridor

- Description:
  - TDA complex D098 transitioned into a permanent Danger Area, with Class G corridor to allow aircraft to route through the Danger Area.
  - Permanent Danger Area rather than temporary.
- Scope & Size:
  - Geographic extent - The same lateral dimensions as TDA D098 complex (see next slide).
  - Ceiling of 2500ft AMSL across the Danger Area, to facilitate corridor from Surface to 1500ft.
- Airspace Management:
  - Danger Area segregating UAS from other air users.
  - Danger Area Activity Information Service (DAAIS) provided by London Information when the DA is active.
  - Danger area inactive when not required.
  - Danger area reverted to pre-existing airspace (baseline) should no operational requirement exist.

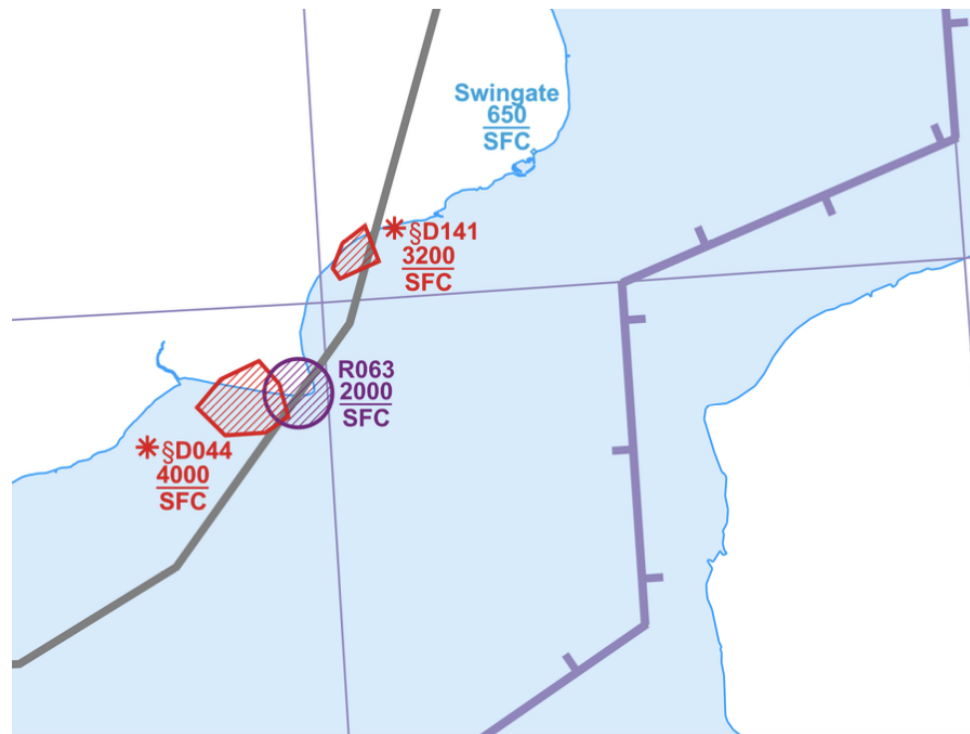
Activation:

- Up to 365 days per year.





## Design Option 2 - Airspace Baseline / Do Nothing: General Geographical Representation



- Class G airspace below CTAs.
- International boundary with EU - Purple.
- Danger Areas – Red.
  - Lydd Ranges
  - Hythe Ranges
- Restricted Area - Purple Circle.
  - Dungeness Power Station.
- Restricted Area - light blue.
  - Dover Port



## Design Option 2 – Airspace Representation



- Two one way corridors within Danger Area complex to allow routing across – Green.
- DA complex of D098 D and C ceiling increased to 2500ft to enable corridor from SFC to 1500ft.
- Doesn't interfere with CTAs.



## Design Option 2 – SWOT

	Helpful (to achieving objective)	Harmful (to achieving objective)
Internal (Organisation)	<p><b>Strengths</b></p> <ul style="list-style-type: none"> <li>• Considers other airspace users requirements.</li> <li>• Minimal impact on environment given the impact of manned alternatives for delivering operational requirement.</li> <li>• Complies with CAA UAS regulations, for safe operations by segregating airspace.</li> </ul>	<p><b>Weaknesses</b></p> <ul style="list-style-type: none"> <li>• Likely to reduce safety, due to funnelling of air users by the airspace construct.</li> <li>• Requires low level flight.</li> <li>• Impacts UAS operational delivery. UAS unable to operate in Class G</li> <li>• Doesn't meet statement of need or considers requirements of other UAS operators.</li> <li>• Likely increased negative environmental impact due to extended routing of air traffic over land.</li> <li>• Volume of airspace will increase due to elevated ceilings of D098 to 2500ft.</li> </ul>
External (environment)	<p><b>Opportunities</b></p> <ul style="list-style-type: none"> <li>• Provides a standardised way to route across the English Channel at low level without ATC approval.</li> <li>• Transparent CAP 1616 process, and appropriate engagement and consultation with stakeholders.</li> </ul>	<p><b>Threats</b></p> <ul style="list-style-type: none"> <li>• Continues to restrict airspace access for General Aviation wishing to operate in the English Channel.</li> <li>• Potential channelling of air traffic.</li> <li>• Additional complexity of airspace construct.</li> <li>• More complicated NOTAMs.</li> <li>• Potential for General Aviation traffic to have to fly at lower altitudes to cross the channel.</li> </ul>



## Design Option 2 – Alignment with Design Principles

Priority	Design Principle	Alignment	
1	Maintain or enhance current levels of safety.	This option is likely to reduce the current levels of safety, due to the high probability of air users being funnelled as they transit through the corridor.	X
2	Consider the requirements of all potential users.	The volume of airspace is not aligned to the current airspace volume (D098) and therefore does not meet the requirements for all potential UAS users.	X
3	Minimise the impact on other airspace users.	Establishing a DA with a corridor to enable the transit of other air users through the segregated airspace, helps minimise the impact on other air users.	✓



## Design Option 2 – Alignment with Design Principles

Priority	Design Principle	Alignment	
4	Comply with UAS regulatory framework.	This option complies with existing UAS regulatory and airspace policy, due to establishing a permanent Danger Area to segregate UAS from other air users.	✓
5	Operating area to be located over the sea.	This airspace change option is entirely over the sea within the English Channel and is therefore aligned with this Design Principle.	—
6	Minimise the noise and environmental impact on areas affected by the proposed change.	The use of UAS in preference to manned aviation to meet the requirements of the UK HMG small boat response, vastly reduces the environmental impact, due to the use of smaller aircraft and the corresponding smaller quantities of fuel expended.	—



## Design Option 2 – Stakeholder Feedback

**We are looking for feedback and wish to understand how this option may impact you.**

Item	Question	Feedback
1	Do you agree with the initial assessment against the agreed Design Principles? If not please provide details?	
2	How would this option impact you?	
3	Do you have any alternative airspace construct suggestions that will meet the statement of need and align with Design Principles?	
4	Do you have any alternative airspace management suggestions that can be considered that will meet the statement of need and Design Principles?	
5	Free Text	



## Summary

- Three options have been developed for initial consideration as part of ACP-2021-088.
- Options 1B, 2 appear to provide viable options to minimise the impact on stakeholders whilst providing appropriate airspace to enable the delivery of UAS operations that meet the Statement of Need.
- Feedback from stakeholders will help refine the options, prior to their evaluation against the design principles, which will be published on the airspace change portal.



## Next Steps

- Stage 2A: Airspace Design Evaluation against Design Principles. (17 to 30 Jan 23).
- Stage 2A: Publish Evaluation on the CAA ACP Portal. (30 Jan 23).
- *Stage 2B: Options Appraisal (30 Jan to 10 Feb 23).*
  - *Each possible option, even if there is only one, is assessed to understand the impact, both positive and negative. The change sponsor carries out the options appraisal against requirements set by the CAA in an iterative approach: the Initial appraisal is the first of three appraisal phases. These are uploaded to the ACP online portal.*
- Stage 2: CAA Develop and Assess Gateway (28 April 23).
- Stage 3: Consultation (June – Aug 23).





## Points of Contact

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