

Feedback regarding ACP 2023-015

To: Aviation team at [REDACTED]

Feedback:

Name

Email

Representing

Address (including postcode if possible)

Feedback:

I object to the implementation of ACP-2023-015 in general and TDA area C in particular.

TDA area C max altitude restriction of 1750ft places a serious risk for pilots transiting west of the Newcastle CTR due to common occurrence of low cloud base in the area. The area is a busy transit route, already squeezed by the existing danger areas to the north and it well known for local low cloud base and changeable weather due the effect of terrain on local weather. A TDA up to 2300 ft in the case of TDA area E is a serious concern for any pilot undertaking a flight in this area.

With no TDA crossing service there is unacceptable risk to the pilot.

Flights to/from Scotland already have weather challenges that can change considerably even within the period of such a flight (I have personal experience of this on several occasions) and any altitude constraints are a major risk factor that must have considered prior to any acceptance of this drone trial.

In general, the whole concept of drone trials in an area well served by roads is beyond belief. There is no attempt to integrate drones with existing GA traffic, just to exclude GA traffic from a relatively busy area and place existing airspace users in potential life-threatening situations.

I wish to point out that I recently supported a drone trial in Ayrshire, Scotland run by CAELUS (ACP 2023-103 N2 route) as they have made a good effort to mitigate risks and have a real need to fly to the islands where road and ferry transport has limitations. The Apian drone trial by comparison is a clear effort to obtain funding for a redundant drone trial at the expense of GA pilot's safety.



[Airspace] ACP 2023-015 feedback

4 August 2023 at 15:15

Good afternoon [REDACTED]

Thank you very much for responding with feedback to our proposal. We appreciate the time it has taken to read the material and provide constructive feedback. We would be more than happy to meet and discuss this with you, but in the meantime, we have addressed your points below.

As a former Air Traffic Controller, please be assured that safety is the absolute priority for us and this is why feedback like yours is critical to our airspace change process. As someone who flies in the Northumberland area, your understanding of the constraints in changeable weather and the information shared with us are vital to help achieve a shared airspace for everyone.

Following your comments regarding changes in weather conditions, it would be very useful if you would consider providing any data on the minimum weather conditions you require before you conduct flights, as well as where you gain that weather report from (i.e TAF, METAR, apps).

Your feedback regarding the DACS and DAAIS is also extremely helpful and we will continue to re-evaluate this requirement based on feedback from the aviation community and refinement of the proposed airspace.

As you will have seen from our trial plan, we are working directly with the Northumbria Healthcare NHS Foundation Trust. Our previous feasibility flights report could be found [here](#), where it demonstrates a significant number of flights being conducted. There is a need for this service to operate alongside traditional logistics to provide an on-demand delivery service in the most rural NHS Trust in England. For more details on the use case, please see Annex B in the trial engagement material.

Current regulations mean that we are required to apply for a TDA, however, we would like to emphasise that we do not see this as a long term solution. We are working in collaboration with the CAA to support the development of integrated airspace that allows equitable use for all airspace users.

We too are extremely supportive of Project CAELUS and their trailblazing work. We are strongly connected to that team and have shared all our learnings from our previous feasibility flights with them, and will continue to do so in the future to ensure productive collaboration across the industry. This trial focuses on providing a centralised clinical service model for the Trust to provide more personalised care and improve inventory cost savings. It will also help transform the NHS' logistics by utilising a UAS delivery whilst in parallel, optimising their existing ground transportation networks.

If you have any further questions or would like to schedule a meeting with either our healthcare or aviation team, please do not hesitate to contact us.

Kind regards

On Tue, 1 Aug 2023 at 14:40 [REDACTED] wrote:

Dear [REDACTED]

Thank you so much for taking the time to provide us with feedback about our proposal ACP-2023-015, feedback is extremely important to us. We will review your feedback and get back to you as soon as possible. In the meantime, please do not hesitate to contact us if you have any questions.

Kind regards

Aviation team at [REDACTED]

A feedback form is provided and a word document is attached to the email containing this material for your use if you wish.

Responses regarding the proposed trial TDA submission must be received by 22nd September 2023.

Name	[REDACTED]	
Email	[REDACTED]	
Representing	[REDACTED]	
Address (including postcode if possible)	[REDACTED]	

Feedback: Having already had a TDA imposed on our airspace for "NHS Trials" I can confirm that these "Trials" over the course of a year consisted of 2 flights carrying actual loads and 1 drone crash at our local hospital. Several " stakeholder consultations" which were PR events designed to persuade impacted parties that these trials were not airspace grabs for future use by companies like Amazon were met with the derision that they deserved.



[Airspace] FFA

4 August 2023 at 15:16



Good afternoon [Redacted]

Thank you very much for responding with feedback to our proposal. We appreciate the time it has taken to read the material and the constructive feedback you have provided. We would be more than happy to meet and discuss this with you, but in the meantime, we have addressed your points below.

Our previous trial conducted over 200 successful flights. [Here](#) is a link to the report from our project. The focus of this trial is on healthcare integration, the benefits to the patients and the wider healthcare system whilst safely implementing UAS technology. It is worth noting that the operator we have selected for this trial has already flown over 75.5 million kilometres and completed more than 700,000 commercial deliveries worldwide.

Apian was founded by two NHS doctors, and all of our work is focused solely on working with patients and clinicians to facilitate deliveries for healthcare. For clarity, this trial is not affiliated with Amazon.

Our stakeholder engagement is a valuable opportunity for us to gather knowledge and input directly from the aviators who fly within the area and know the Northumbria area best. We welcome any feedback specific to this ACP.

If you have any further questions or would like to schedule a meeting with either our healthcare or aviation team, please do not hesitate to contact us.

Kind regards



On Tue, 1 Aug 2023 at 14:41 [Redacted] wrote:

Dear [Redacted]

Thank you so much for taking the time to provide us with feedback about our proposal ACP-2023-015, feedback is extremely important to us. We will review your feedback and get back to you as soon as possible. In the meantime, please do not hesitate to contact us if you have any questions.

Kind regards



On Mon, 31 Jul 2023 at 10:25 [Redacted] wrote:

|



ACP-2023-015 Northumbria Healthcare NHS Foundation Trust feasibility flights within a trial Temporary Danger Area (TDA).

[REDACTED]

31 July 2023 at 09:44

Dear ACP proposer

Thank you for your information.

The British Hang Gliding and Paragliding Association (BHPA) represents 7500 pilots who fly hang gliders, paragliders and their powered variants (e.g. paramotors). It is important to point out that whilst most paraglider and hang glider pilots are BHPA members, a portion of the UK's paramotor community exists independently of the BHPA, and the BHPA's safety information cannot be certain to reach these pilots.

Our members operate from hills, sea cliffs, licensed and unlicensed aerodromes, tow fields and farmers' fields, from the surface to cloudbase, singly or in gaggles of multiple aircraft. We do not fly with airband radios or transponders.

Your ACP proposal has been forwarded to local hang gliding and paragliding clubs who may be affected by your ACP, and may contact you directly. These clubs operate on a volunteer basis so a reply may not be immediate. However, no response from them at this stage of your ACP application is no guarantee that your proposal (or any subsequent revisions) will not affect their operations.

For more information about hang gliding and paragliding (particularly related to EC) please refer to the document I link to here: https://www.bhpa.co.uk/documents/members/index.php?doc=BHPA_EC_Position.pdf

Kind regards

[REDACTED]

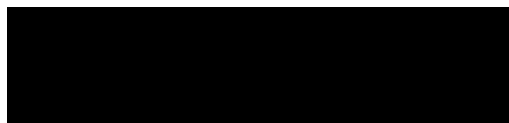
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<ACP-2023-015 feedback form.docx><ACP-2023-015 Trial Plan.pdf>



ACP-2023-015 Northumbria Healthcare NHS Foundation Trust feasibility flights within a trial Temporary Danger Area (TDA).



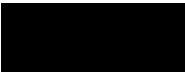
2 August 2023 at 13:34

Dear 

Thank you very much for your email.

We appreciate the time you have taken to respond to our stakeholder engagement, and want to assure you that we are committed to reviewing and responding to all feedback received. Thank you for forwarding our proposal to the local hang gliding and paragliding clubs and we will await any feedback they may have. In the meantime, if you would like to talk to one of our team, please respond to this email and we will contact you.

Kind regards,



[Quoted text hidden]



[Airspace] Fwd: Drone trial Northumberland

1 August 2023 at 09:33

FYI

[REDACTED]
Date: Tue, 1 Aug 2023, 09:30
Subject: Drone trial Northumberland
To: [REDACTED]

Dear sirs,

As an aircraft owner I wish to object to the proposed drone trials in the strongest terms:

1. The area is G class airspace (uncontrolled) and allows pilots to navigate south either under controlled airspace along the east coast, or via Hexham to the west. Frequently only one of these routes is viable due to weather conditions. Recently I had to divert along the east route due to bad weather to the west in order to get to my home airfield safely. The trial would deny any of these routes effectively cutting off the airspace north of Hexham / Newcastle / Spadeadam without gaining authority to enter Newcastle controlled airspace.
2. Newcastle ATC rarely allow transits through their airspace due to their workload, meaning the trial would prevent ANY route through to the north or south - how can any respectable company propose such a denial of airspace to every user just to benefit themselves?
3. Losing off vast swathes of airspace from surface level is incredibly dangerous - where does a pilot perform an enforced emergency landing - CERTAINLY NOT IN CONTROLLED AIRSPACE but your proposal leaves no choice!!!
4. If the NHS are so dependant on these supplies how do they manage when the weather prevents flying - surely one person in a van or the FREE blood bike service is a better use of financial resources - or is this trial really aimed at retailers like Amazon???

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To view this discussion on the web, visit <https://groups.google.com/a/apian.aero/d/msgid/hello/FA3E01FE-F91E-4C2E-BE24-629F692D4854%40gmail.com>.



[Airspace] Fwd: Drone trial Northumberland



4 August 2023 at 15:21

Good afternoon [Redacted]

Thank you very much for responding with feedback to our proposal. We appreciate the time it has taken to read the material and the constructive feedback you have provided. We would be more than happy to meet and discuss this with you, but in the meantime, we have addressed your points below.

As a former Air Traffic Controller, please be assured that we do understand that weather can affect a planned flight. As someone who flies in Northumbria on a regular basis, the information you have provided us regarding weather conditions is vital in assessing the airspace we are proposing.

Following your comments regarding changes in weather conditions, it would be very useful if you would consider providing any data on the minimum weather conditions you require before you conduct flights, as well as where you gain that weather report from (i.e TAF, METAR, apps).

Current regulations mean that we are required to apply for a TDA, however, we would like to emphasise that we do not see this as a long-term solution and are working in collaboration with the CAA to support the development of integrated airspace that allows equitable use for all airspace users.

Safety is an absolute priority for Apian and a key part of this is reducing the risk to other airspace users. We acknowledge your comments on the potential unfortunate requirement that you may need an emergency landing in our proposed TDA. In this scenario, we would of course follow CAA guidance and would adhere to CAA regulations.

Apian was founded by two NHS doctors, and all of our work is focused on providing improved healthcare to our patients and clinicians. We are working directly with the Northumbria Healthcare NHS Foundation Trust to provide an on-demand delivery service in the most rural NHS Trust in England. For more details on the use case, please see Annex B in the trial engagement material. For clarity, this trial is not affiliated with Amazon in any way.

It is important to understand that whilst the blood bikes provide an essential and critical service to the patients and clinicians within Northumbria, it is run entirely by the goodwill of volunteers. This means they are only able to offer a limited, but vital, service for emergency use during out-of-hours and are unable to support the scale of clinical needs from the NHS. A person in a van would be unsustainable and inefficient given the number of deliveries required.

If you have any further questions or would like to schedule a meeting with either our healthcare or aviation team, please do not hesitate to contact us.

Kind regards



On Tue, 1 Aug 2023 at 14:37, [Redacted] wrote:

Dear [Redacted]

Thank you so much for taking the time to provide us with feedback about our proposal ACP-2023-015, feedback is extremely important to us. We will review your feedback and get back to you as soon as possible. In the meantime, please do not hesitate to contact us if you have any questions.

Kind regards





RE: [Airspace] RE: [EXTERNAL] ACP-2023-015 Northumbria Healthcare NHS Foundation Trust feasibility flights within a trial Temporary Danger Area (TDA).

1 message

9 August 2023 at 16:59

Hi [REDACTED]

I have some diary space 6-8 Sep 23

My personal view is that BVLOS drones should really have ADS-B Out unless they are transponder equipped in order to provide EC for conflicts with other atypical lower airspace users like ourselves? ADS-B In gives the UAS the opportunity to avoid ADS-B Out traffic, but all airspace users need to be able to detect each other mutually. It is reasonable to call a number prior to flight but NGET may need access to the TDAs at short notice (eg to quickly locate damage to powerlines resulting from a lightning strike) so the ability to communicate with the UAS pilots as if they were manned aircraft to achieve real-time deconfliction should be a pre-requisite in the absence of 2-way EC. Use of a voice-frequency similar to Safetycom, Depcom or Low Level common frequencies should be devised. Is there any reason that we cannot utilise the Low Level Common Frequency which is primarily a Military/Civil deconfliction concept?

Subject: Re: [Airspace] RE: [EXTERNAL] ACP-2023-015 Northumbria Healthcare NHS Foundation Trust feasibility flights within a trial Temporary Danger Area (TDA).

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Good afternoon [REDACTED]

Thank you very much for responding with feedback to our proposal. We appreciate the time it has taken to read the material and provide constructive feedback.

In order to coordinate with your operations, we would like to meet and discuss this in detail to ensure you are not adversely impacted. We have experience in accommodating and de-conflicting with HEMS and other similar airspace users and are confident we can find a mutually agreeable solution.

The UAS will be equipped with ADS-B in to provide the UAS operator with a picture of air traffic. Activation of the TDA will be communicated via NOTAM with a minimum of 24hrs notice provided. If we are not utilising the airspace, we will request for the NOTAM to be deactivated in accordance with the flexible use of airspace principles. Contact details for the operations team will be included in the NOTAM.

If you could please suggest a convenient time for us to discuss your operations in detail, that would be greatly appreciated.

We look forward to hearing from you.

Kind regards



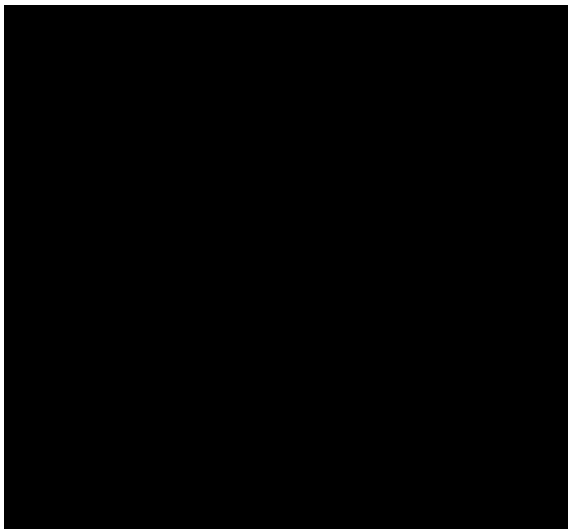
On Tue, 1 Aug 2023 at 18:13, [REDACTED] via airspace [REDACTED] wrote:

Hi [REDACTED], please see feedback/queries below:

Name	[REDACTED]
Email	[REDACTED]
Representing	[REDACTED]
Address (including postcode if possible)	[REDACTED]

Feedback:

NGET have key national infrastructure (overhead lines and substations) in proposed TDAs A, C & D which require routine and emergency patrols by NGET helicopter and EVLOS UAS in the same airspace band as the Zips. NGET Helicopter and EVLOS UAS patrols will often require 2-3hours of continual access at low level in the hover at 100-300ft agl. A 6 month TDA programme with 12 BVLOS UAS flights per day between 0800-1800 will severely limit the necessary and at times, short-notice and continuous access to NG assets for condition assessment unless real-time co-ordination/deconfliction can be achieved. What communications network will enable TDA access for key survey aircraft and what electronic conspicuity is proposed (eg will the helicopter/EVLOS pilot be able to talk to the BVLOS pilots? Are Zips ADS-B equipped?) How will airspace users know which sectors are active at a given time, if timings change at short notice?



From [REDACTED]

Sent: 28 July 2023 15:50

To: [REDACTED]

Subject: [EXTERNAL] ACP-2023-015 Northumbria Healthcare NHS Foundation Trust feasibility flights within a trial Temporary Danger Area (TDA).

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Dear Stakeholder,

Request for support to [ACP-2023-015](#) Northumbria Healthcare NHS Foundation Trust feasibility flights within a trial Temporary Danger Area (TDA).

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

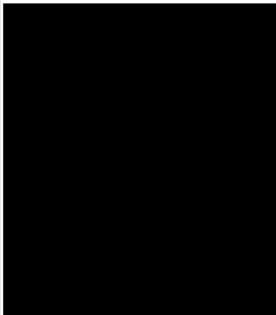
Apian, in conjunction with the Northumbria Healthcare NHS Foundation Trust, is looking to conduct feasibility flights using UAS between hospitals, GP surgeries, care homes and pharmacies. We would like to trial a regular, on-demand delivery service for the distribution of medical payloads such as, prescription medication, medical implants, medical electronics, blood packs, medical and consumable supplies, medical documentation, as well as emergency deliveries. These flights will allow us to research, validate and provide vital data to establish whether the use of UAS, in these clinical settings will lead to improved patient care.

You may have supported us on our previous project in Northumbria ([ACP-2022-031](#)), and we would like to thank you for the support and feedback you provided during and after the [project](#). That feedback allowed us to gain an understanding of how we can better integrate UAS. Please see the summary and lessons learnt during that project [here](#).

As part of our application for a trial TDA, we have identified you as a key stakeholder. We have attached our trial plan for our proposal which includes details of our trial TDA in Annex C. We have also included a feedback form which we kindly request you return to us before the end of our stakeholder engagement period, 22nd September 2023, and look forward to receiving your confirmation of support.

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

Kind regards,



How to provide feedback

Apian welcomes comments and feedback from all interested parties. All comments received regarding this proposal will be taken into consideration before a final design is submitted to the CAA. All the details of this airspace change proposal are available on the [CAA's Airspace Change Portal](#). Feedback on the proposed trial TDA, or requests for further information should be sent to:

Aviation team at airspace@apian.aero

A feedback form is provided and a word document is attached to the email containing this material for your use if you wish.

Responses regarding the proposed trial TDA submission must be received by 22nd September 2023.

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

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ACP-2023-015 Northumbria Healthcare NHS Foundation Trust feasibility flights within a trial Temporary Danger Area (TDA).



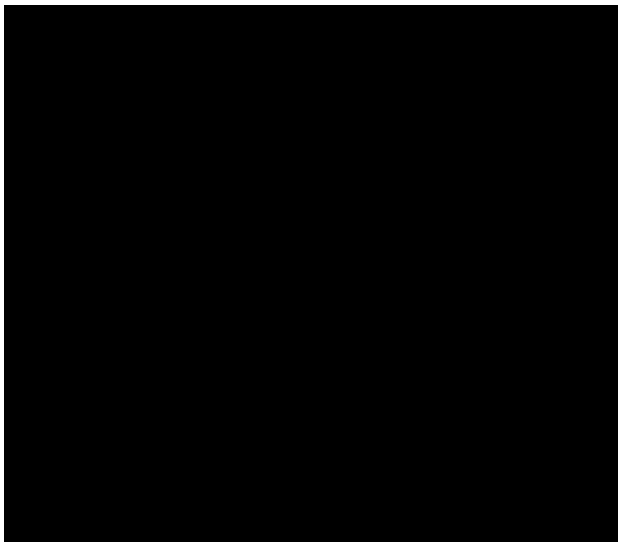
1 August 2023 at 18:12

Hi [redacted] please see feedback/queries below:

Name	[redacted]
Email	[redacted]
Representing	[redacted]
Address (including postcode if possible)	[redacted]

Feedback:

NGET have key national infrastructure (overhead lines and substations) in proposed TDAs A, C & D which require routine and emergency patrols by NGET helicopter and EVLOS UAS in the same airspace band as the Zips. NGET Helicopter and EVLOS UAS patrols will often require 2-3hours of continual access at low level in the hover at 100-300ft agl. A 6 month TDA programme with 12 BVLOS UAS flights per day between 0800-1800 will severely limit the necessary and at times, short-notice and continuous access to NG assets for condition assessment unless real-time co-ordination/deconfliction can be achieved. What communications network will enable TDA access for key survey aircraft and what electronic conspicuity is proposed (eg will the helicopter/EVLOS pilot be able to talk to the BVLOS pilots? Are Zips ADS-B equipped?) How will airspace users know which sectors are active at a given time, if timings change at short notice?



From [REDACTED]

[REDACTED] Northumbria Healthcare NHS Foundation Trust feasibility flights within a trial Temporary Danger Area (TDA).

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You may report the matter by contacting us via our [UK Contacts Page](#) or our [US Contacts Page](#) (accessed by clicking on the appropriate link)

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ACP-2023-015_Trial_Plan.pdf
2825K



ACP-2023-015 Northumbria Healthcare NHS Foundation Trust feasibility flights within a trial Temporary Danger Area (TDA).

[REDACTED]

4 August 2023 at 15:24

Good afternoon [REDACTED]

Thank you very much for responding with feedback to our proposal. We appreciate the time it has taken to read the material and provide constructive feedback.

In order to coordinate with your operations, we would like to meet and discuss this in detail to ensure you are not adversely impacted. We have experience in accommodating and de-conflicting with HEMS and other similar airspace users and are confident we can find a mutually agreeable solution.

The UAS will be equipped with ADS-B in to provide the UAS operator with a picture of air traffic. Activation of the TDA will be communicated via NOTAM with a minimum of 24hrs notice provided. If we are not utilising the airspace, we will request for the NOTAM to be deactivated in accordance with the flexible use of airspace principles. Contact details for the operations team will be included in the NOTAM.

If you could please suggest a convenient time for us to discuss your operations in detail, that would be greatly appreciated.

We look forward to hearing from you.

Kind regards

[REDACTED]

[Quoted text hidden]

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Re: [Airspace] RE: [EXTERNAL] ACP-2023-015 Northumbria Healthcare NHS Foundation Trust feasibility flights within a trial Temporary Danger Area (TDA).

1 message

15 August 2023 at 20:20

Thank you for your reply,

I will send you a meeting request for 7th Sept at 3 pm, if this time is not suitable, please let me know and we can reschedule.

As mentioned previously, we have experience in accommodating and de-conflicting with HEMS and other similar airspace who, like yourselves, may need access at short notice. So we are confident that we can find a mutually agreeable solution.

We welcome any feedback and suggestions you may have to help improve the integration and safety of operations. Unfortunately, the Low Level Common Frequency is used for blind calls, and would not be able to provide safe entry to a TDA, which would need 2-way communications. We are happy to discuss this and any other suggestions in more detail at our call.

We look forward to meeting you,

On Wed, 9 Aug 2023 at 16:59, [REDACTED] wrote:

Hi [REDACTED]

I have some diary space 6-8 Sep 23

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If you could please suggest a convenient time for us to discuss your operations in detail, that would be greatly appreciated.

We look forward to hearing from you.

Kind regards

[REDACTED]

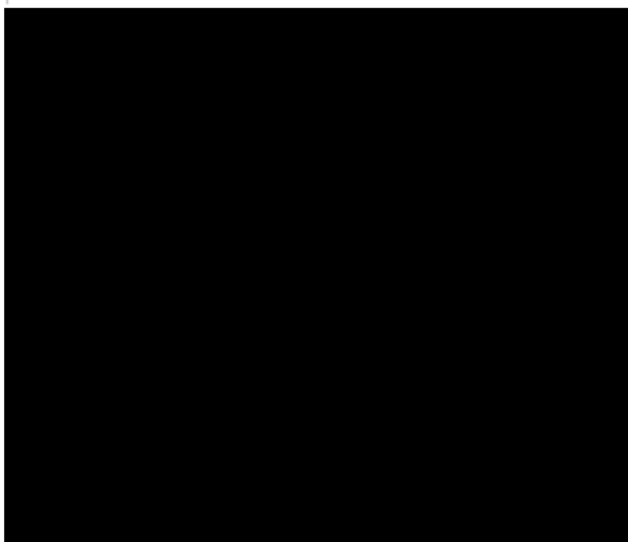
[REDACTED]

On Tue, 1 Aug 2023 at 18:13, 'John Rigby' via airspace <airspace@apian.aero> wrote:

Hi [REDACTED] please see feedback/queries below:

Name	[REDACTED]
Email	[REDACTED]

Representing	[REDACTED]
Address (including postcode if possible)	[REDACTED]
Feedback: <p>NGET have key national infrastructure (overhead lines and substations) in proposed TDAs A, C & D which require routine and emergency patrols by NGET helicopter and EVLOS UAS in the same airspace band as the Zips. NGET Helicopter and EVLOS UAS patrols will often require 2-3hours of continual access at low level in the hover at 100-300ft agl. A 6 month TDA programme with 12 BVLOS UAS flights per day between 0800-1800 will severely limit the necessary and at times, short-notice and continuous access to NG assets for condition assessment unless real-time co-ordination/deconfliction can be achieved. What communications network will enable TDA access for key survey aircraft and what electronic conspicuity is proposed (eg will the helicopter/EVLOS pilot be able to talk to the BVLOS pilots? Are Zips ADS-B equipped?) How will airspace users know which sectors are active at a given time, if timings change at short notice?</p>	



From: [REDACTED]
Sent: 28 July 2023 15:50
To: [REDACTED]
Subject: [EXTERNAL] ACP-2023-015 Northumbria Healthcare NHS Foundation Trust feasibility flights within a trial Temporary Danger Area (TDA).

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Dear Stakeholder,

Request for support to [ACP-2023-015 Northumbria Healthcare NHS Foundation Trust feasibility flights within a trial Temporary Danger Area \(TDA\)](#).

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

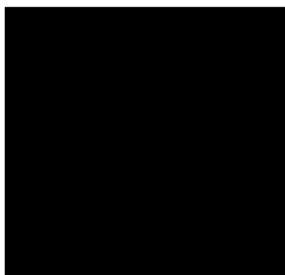
Apian, in conjunction with the Northumbria Healthcare NHS Foundation Trust, is looking to conduct feasibility flights using UAS between hospitals, GP surgeries, care homes and pharmacies. We would like to trial a regular, on-demand delivery service for the distribution of medical payloads such as, prescription medication, medical implants, medical electronics, blood packs, medical and consumable supplies, medical documentation, as well as emergency deliveries. These flights will allow us to research, validate and provide vital data to establish whether the use of UAS, in these clinical settings will lead to improved patient care.

You may have supported us on our previous project in Northumbria ([ACP-2022-031](#)), and we would like to thank you for the support and feedback you provided during and after the [project](#). That feedback allowed us to gain an understanding of how we can better integrate UAS. Please see the summary and lessons learnt during that project [here](#).

As part of our application for a trial TDA, we have identified you as a key stakeholder. We have attached our trial plan for our proposal which includes details of our trial TDA in Annex C. We have also included a feedback form which we kindly request you return to us before the end of our stakeholder engagement period, 22nd September 2023, and look forward to receiving your confirmation of support.

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

Kind regards,

**How to provide feedback**

Apian welcomes comments and feedback from all interested parties. All comments received regarding this proposal will be taken into consideration before a final design is submitted to the CAA. All the details of this airspace change proposal are available on the [CAA's Airspace Change Portal](#). Feedback on the proposed trial TDA, or requests for further information should be sent to:

Aviation team at airspace@apian.aero

A feedback form is provided and a word document is attached to the email containing this material for your use if you wish.

Responses regarding the proposed trial TDA submission must be received by 22nd September 2023.

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

This e-mail, and any attachments are strictly confidential and intended for the addressee(s) only. The content may also contain legal, professional or other privileged information. If you are not the intended recipient, please notify the sender immediately and then delete the e-mail and any attachments. You should not disclose, copy or take any action in reliance on this transmission.

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[Airspace] ACP 2023-015



1 August 2023 at 12:54

I note that the LAA are listed as a consultee but have no record of any contact. Can you kindly advise when / where it was sent ?

Can I also note that we have not had the opportunity to comment and that although the closing date is I understand passed we still wish to do so.





[Airspace] ACP-2023-015

1 August 2023 at 10:40

Name: [REDACTED]

Email: [REDACTED]

Representing: [REDACTED]

Address: [REDACTED]

Feedback: The ACP would prevent pilots north or south of the ATZ around Newcastle from being able to fly between these 2 areas.

Generally, Zone transits through Newcastle controlled airspace are refused, making the only possible route to go outside their controlled zone. In order to do this, and remain safe, we need to pass under the extreme East or West of the Zone, at below 1,500 feet.

With the ACP active we cannot do this, meaning we cannot transit from north to south, or south to north of Newcastle, cutting us off from the remainder of the country.

Unless Newcastle ATC can GUARANTEE that all requests for a Zone transit will be approved, including for those aircraft without radio or transponder.

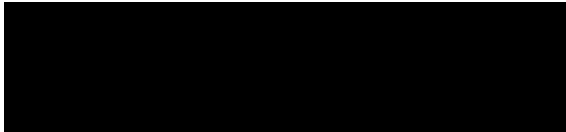
We also fly non-certified aircraft, meaning that we must always fly with the possibility of needing an emergency landing in the event of a failure.

If the ACP goes down to the surface we could not do that, even if we attempted to fly above the ACP area. This is potentially dangerous.

This proposal would cause great inconvenience to all aircraft in the North of the country, cutting us off from the remainder of the countrys' flying, and create a danger for all of us.



[Airspace] ACP-2023-015



4 August 2023 at 15:41

Good afternoon 

Thank you very much for responding with feedback to our proposal. We appreciate the time it has taken to read the material and the constructive feedback you have provided. We would be more than happy to meet and discuss this with you, but in the meantime, we have addressed your points below.

As former Air Traffic Controllers, we understand the need to safely transit within the area. However, your insight as someone who flies within Northumberland is invaluable and helps us to better understand how the shared airspace can be utilised.

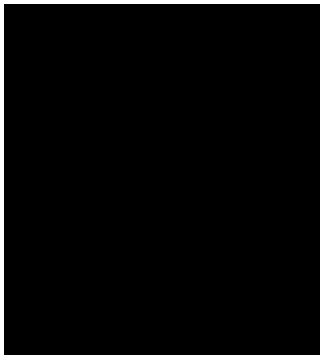
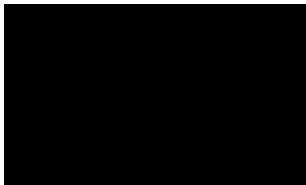
Apian is being supported and guided by Newcastle International ATC regarding operations in close proximity to Newcastle Airport. We will continue to re-evaluate the DACS and DAAIS requirements based on feedback from the aviation community and refinement of the airspace.

We acknowledge your comments on the potential unfortunate requirement that you may need an emergency landing in our proposed TDA. We would of course follow CAA guidance and adhere to CAA regulations.

Apian was founded by two NHS doctors, and all of our work is focused on providing improved healthcare to our patients and clinicians. We are working directly with the Northumbria Healthcare NHS Foundation Trust, to provide an on-demand delivery service in the most rural NHS Trust in England. For more details on the use case, please see Annex B in the trial engagement material.

If you have any further questions or would like to schedule a meeting with either our healthcare or aviation team, please do not hesitate to contact us.

Kind regards





[Airspace] Public safety


Reply-to: airspace@apian.aero
To: airspace@apian.aero

1 August 2023 at 20:18

I would like to object to unmanned drone flying. Do they carry any conspicuity device to make them visible to other manned aircraft or the ability to avoid other aircraft if on a collision course.
Unmanned and poorly equipped drones are accidents waiting to happen, in a mid air collision the drone would be lost along with the airplane and human pilot plus anyone on the ground hit by the debris.
Drone delivery service will cost lives, then statements that you will learn from the accident.





[Airspace] Public safety

4 August 2023 at 15:51

Good afternoon [REDACTED]

Thank you very much for responding with feedback to our proposal. We appreciate the time it has taken to read the material and the constructive feedback you have provided. We would be more than happy to meet and discuss this with you, but in the meantime, we have addressed your points below.

The Uncrewed Aircraft System (UAS) will be equipped with ADS-B in to provide the UAS operator with a picture of air traffic. However, our proposal is to conduct these feasibility flights in a Temporary Danger Area (TDA) which provides safe segregated airspace for our operations. This trial will help support the long term plan to better understand how UAS and other aviators can safely share airspace.

Our previous trial conducted over 200 successful flights. [Here](#) is a link to the report from our project. The UAS operator we have selected for this trial has flown over 75.5 million kilometres and completed more than 700,000 commercial deliveries worldwide to date. Operational authorisation will be required from the CAA prior to the commencement of flight operations.

If you have any further questions or would like to schedule a meeting with either our healthcare or aviation team, please do not hesitate to contact us.

Kind regards

[REDACTED]

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[Airspace] Re: Northumbria Visit



2 August 2023 at 15:16

Hi,

Thanks for your email, I have put this forward to the members and this is definitely something we would be interested in.

What sort of timeframe are you thinking of?

Many thanks



On [Redacted] wrote:

Dear [Redacted]

We recently sent you our trial plan for ACP-2023-015.
We really appreciate any feedback we get regarding our trials and was wondering if a visit to your airfield might allow us time to talk though our proposal face to face, and also answer any questions you might have.
We would also happily support a virtual briefing in addition for your members, if you believe that would be of benefit.
Please let me know if this is something that might interest you and we can organise a suitable date.

Kind regards





[Airspace] Re: Northumbria Visit

4 August 2023 at 09:48

Morning [REDACTED]

That's great news.

Whether you decide on a visit or a virtual call, we could organise a weekday evening or a weekend if that is easier for the club.

I would suggest the end of August, early September but do let me know if there are any good dates for you.

On Wed, 2 Aug 2023 at 15:17, [REDACTED] wrote:

Hi,

Thanks for your email, I have put this forward to the members and this is definitely something we would be interested in.

What sort of timeframe are you thinking of?

Many thanks

[REDACTED]

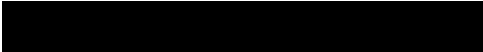
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Please let me know if this is something that might interest you and we can organise a suitable date.

Kind regards

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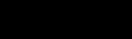
Kind regards



[Airspace] Re: Northumbria Visit



2 August 2023 at 15:28

H 

Yes it looks a very dangerous proposal indeed and I gather is causing a pretty fierce reaction all round.

I think a meeting will be very necessary to discuss it.

Kind regards



On Wed, 2 Aug 2023 at 13:52,  wrote:

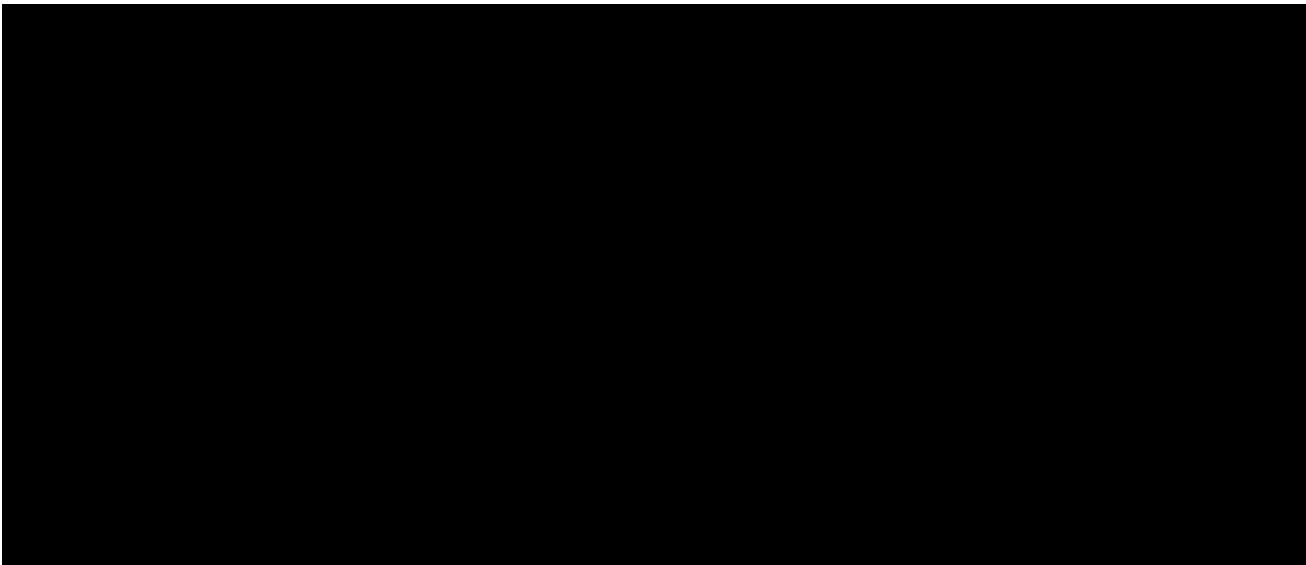
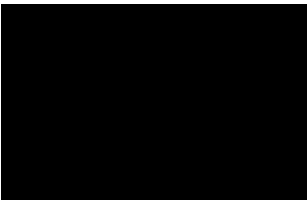
Dear 

We recently sent you our trial plan for ACP-2023-015.

We really appreciate any feedback we get regarding our trials and was wondering if a visit to your airfield might allow us time to talk through our proposal face to face, and also answer any questions you might have.

We would also happily support a virtual briefing in addition for your members if you believe that would be of benefit. Please let me know if this is something that might interest you and we can organise a suitable date.

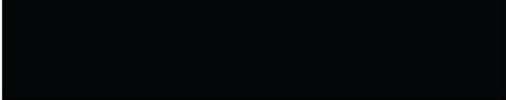
Kind regards





[Airspace] Re: Northumbria Visit

4 August 2023 at 09:54



Morning

Please let us know if you would prefer a visit or a virtual call to discuss this. We could do a weekday evening or a weekend, to fit in with the club.
We would suggest the end of August, early September might be a good time to get something booked in, but do let me know your thoughts.
Thank you.

On Wed, 2 Aug 2023 at 15:29, wrote:

Hi

Yes it looks a very dangerous proposal indeed and I gather is causing a pretty fierce reaction all round.

I think a meeting will be very necessary to discuss it.

Kind regards



On Wed, 2 Aug 2023 at 13:52,

Dear

We recently sent you our trial plan for ACP-2023-015.
We really appreciate any feedback we get regarding our trials and was wondering if a visit to your airfield might allow us time to talk though our proposal face to face, and also answer any questions you might have.
We would also happily support a virtual briefing in addition for your members if you believe that would be of benefit.
Please let me know if this is something that might interest you and we can organise a suitable date.

Kind regards



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[Airspace] ACP-2023-015 Trial - Feedback

3 August 2023 at 13:10

Dear [REDACTED]

Thank you very much for your email.

We appreciate the time you have taken to respond to our stakeholder engagement, and want to assure you that we are committed to reviewing and responding to all feedback received. We anticipate getting back to you within 3 working days. In the meantime, if you would like to talk to one of our team, please respond to this email and we will contact you.

Kind regards,

On Thu, 3 Aug 2023 at 10:07 [REDACTED] wrote:

Name: [REDACTED]

Email: [REDACTED]

Representing: [REDACTED]

Address [REDACTED]

Feedback:

I object to this proposed ACP in the strongest terms as the TDA design completely fails to adhere to the CAA requirement to minimise impact on other air users. It closes two grass airstrips, blocks the busy East Coast VFR coastal transit route under the Newcastle CTA, creates choke points that will result in a large increase in traffic seeking Newcastle zone transits/Spadeadam D510 crossings and is unreasonable in its vertical planning, extending to around 1500ft AGL in the busy Tyne Valley transit route.

Area B

The East coastline under the base of the 1500ft Newcastle CTA is a busy transit route for VFR GA traffic and also allows non-radio traffic to move freely. Area B (SFC-1300ft) effectively blocks this route and will force east coast traffic to seek a formal zone transit with Newcastle ATC at a time when Newcastle ATC is short-staffed and operating with reduced hours. The only option for non-radio traffic will be to head 4 miles out to sea, significantly increasing risk for these air users who are traditionally historic aircraft or basic microlights.

Area C & D

When active, Area C closes the Hexham and Stanton airstrips that have operated for many years and are home to a variety of LAA, BMAA and historic aircraft.

The design uses a blunt approach of 600ft AGL above tallest known feature within the TDA, giving 1750ft AMSL in Area C and 2000ft AMSL in Area D. This results in much of the TDA being 1000ft-1500ft AGL rather than the desired/claimed 600ft AGL. The Tyne valley is a primary coast-to-coast transit route for both civil and military traffic in the North and the proposed 1750ft/2000ft TDA base will prevent 500ft-1000ft AGL valley transits when the cloud base is low. This will severely restrict GA coast-to-coast access.

DACS

Apian claim "Due to the heights of the proposed TDA complex (600 ft AGL above the tallest known feature), a Danger Area Crossing Service (DACs) will not be provided.". A DACs would allow both Stanton and Hexham to operate whilst allowing the continued flow of the busy Coastal and Tyne Valley VFR transit routes which can achieve 1000ft AGL within the majority of the TDA. The onus should be on Apian to resolve rather than a disingenuous and misleading statement.

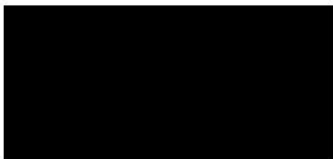
TDA Activation

During previous UAS operations on the Northumberland Coast, I didn't see any evidence that Apian cancelled TDA activation by fresh Notam when operations were suspended for weather or serviceability, often for days on end. In lead air space remained blocked to other users despite it being unusable for days. Apian should release air space once it is clear operations will be suspended.

Summary

The extensive nature of this TDA will severely and negatively impact other air users in Northern England. I believe this trial only becomes viable when certified Detect and Avoid Technology is available enabling co-existence rather than implementation via a TDA. By progressing the TDA option, the wider flying community is being hugely restricted and put at significant risk which is totally unacceptable

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Kind regards





[Airspace] ACP-2023-015 Trial - Feedback

8 August 2023 at 15:13

Good afternoon [REDACTED]

Thank you very much for responding with feedback to our proposal. We appreciate the time it has taken to read the material and the constructive feedback you have provided. We would be more than happy to meet and discuss this with you, but in the meantime, we have addressed your points below.

As previous air traffic controllers we have knowledge of and appreciate the restrictions you might face when flying, and getting a perspective from a pilot who flies in the local area is extremely important. Your feedback will help us continue the airspace change process by taking into consideration the feedback we have received to develop a more refined airspace.

Our intention is to work with the local GA community, including any local airfields or airstrips, to explore the possibility of operations working alongside each other, we completely understand that this is not always feasible. It is extremely challenging to gain data on the GA operations at uncertified aerodromes, and proves why the stakeholder engagement is an important part of the process. We have previously successfully demonstrated working in close proximity to microgliding and gliding clubs, and believe we could work with you and the broader GA community to achieve the same in this trial.

Our UAS operator will be conducting operations below 600ft AGL, we will continue to evaluate the airspace requested for operations to ensure that the minimum airspace is being requested.

Apian is being supported and guided by Newcastle International ATC regarding operations in close proximity to Newcastle Airport. We will continue to re-evaluate the DACS and DAAIS requirements based on feedback from the aviation community and refinement of the airspace.

Current regulations mean that we are required to apply for a TDA, however, we would like to emphasise that we do not see this as a long-term solution and are working in collaboration with the CAA to support the development of integrated airspace that allows equitable use for all airspace users.

Our UAS operator intends to seek CAA guidance on compliantly deploying detect and avoid technology to remove the need for segregated airspace, in line with the Airspace Modernisation Strategy.

Regarding NOTAMs in our previous trial, these were cancelled by the UAS operator directly when we did not anticipate flying. As per the NOTAM process, these were cancelled through the Airspace Regulation (Utilisation) Operations team at the CAA, who communicate them to the aviation industry. Cancellations of usage for the TDA was due to daily limitations (i.e weather), which is why cancellations were not seen in advance as we utilised the TDA to complete as many deliveries, and capture as much data for the NHS as possible.

If you have suggestions to improve the safe sharing of this information, please let us know and we can discuss them with the CAA.

If you have any further questions or would like to schedule a meeting with either our healthcare or aviation team, please do not hesitate to contact us.

Kind regards

On Thu, 3 Aug 2023 at 10:07 [REDACTED]

[Quoted text hidden]

wrote:



Re: [Airspace] Objection to Tyne Valley ACP

1 message

11 August 2023 at 10:43

Hi [REDACTED]

Thanks for your email. It's hard to disguise my frustration with this proposal so I apologise if I'm to the point.

There are several significant questions that you failed to answer that I would appreciate your comments on.

I agree that a TDA is not a long term solution, in fact do not see it as a short term solution either - it's a total non-starter. I believe you should be lobbying the regulator to prove your safety case rather than blindly pushing ahead to the detriment of local airfields, airspace users and volunteer-led community facilities.

As a former air traffic controller you must agree that squeezing more traffic into tighter confines is only going to reduce safety? Safety cannot be a priority for you, unless you mean exclusively to protect the safety of your drone at the detriment to other airspace users?

Your trial *isn't* one step closer to proving it can integrate with other traffic. It's quite the opposite. You are segregating your drone from all other traffic, which will prove nothing.

What about the airfields located directly within your TDA? How do you intend on not affecting operations to and from those airfields?

What about operations from our own airfield, meaning utilising gliding conditions to the north is now severely impacted? It might be of no relevance to your trial, but it certainly is to us.

The east coast trial is a good example of the TDA being excessive. You say the drone operated at 400ft, but out over the sea it could have quite safely operated at say 150-200ft, only flying higher as it approached terrain. Tops could have been reduced to 450ft over the sea. Again, irrespective of current policy at the CAA, a NOTAM advising pilots to be aware of low level drone activity up to 400ft AGL in the region you wish to operate can be the only way forwards to my mind, and I would be happy for a trial on that basis to go ahead. Negotiations with the regulator to change their policy should be the next stage. I can't believe I am the only one to suggest this as an option, so you must have evidence of support from the aviation community on that point. The risk is acceptable to those of us that fly in uncontrolled airspace - in fact there are regular NOTAMs published for military exercises that state military aircraft may not be able to comply with rules of the air, yet we still operate within the same airspace. We already accept the risk of other drone or model aircraft operators flying where we fly - even if they choose to disregard the rules. Even the risk of a bird strike is a fair comparison. There's nothing we can do about that, but lookout.

I appreciate it is early days and you are still gathering feedback, so I see no benefit in meeting with you at this stage. If you are genuinely looking to amend your proposal to reduce the negative impacts on the local aviation community then maybe we can arrange something at a later date, when a more refined proposal is put together.

Thank you.

[REDACTED]

On 8 Aug 2023, at 15:19, [REDACTED] wrote:

Good afternoon [REDACTED]

Thank you very much for responding with feedback to our proposal. We appreciate the time it has taken to read the material and the constructive feedback you have provided. We would be more than happy to discuss this with you, but in the meantime, we have addressed your points below.

As former Air Traffic Controllers, we understand the need to safely transit within the area. Safety is an absolute priority for Apian and a key part of this is reducing the risk to other airspace users. Your insight,

as someone who flies within Northumberland is invaluable and helps us to better understand how the shared airspace can be utilised.

Our priorities are to provide improved healthcare for patients and clinicians, but we also want to work collaboratively with local aviation. This trial is one step closer to proving UAS can do this and at the same time integrate safely with crewed aviation. Current regulations mean that we are required to apply for a TDA, however, we would like to emphasise that we do not see this as a long-term solution and are working in collaboration with the CAA to support the development of integrated airspace that allows equitable use for all airspace users.

With reference to our previous trial, the TDA was segmented into 3 sections to support the access for emergency services and military on operations. We operated over the sea due to feedback from stakeholder engagement and to minimise impact on other airspace users, although this was not our optimal routing. Those segments were 650ft AMSL over sea and 850ft over land to allow for safe segregation against aviation that may be operating at 650ft whilst the aircraft operated at 400ft.

Apian is co-founded by NHS Doctors, and as such, all our trials are focused around identifying, demonstrating and implementing the real benefits to patients and clinicians as we integrate all our operations directly into the NHS. Conducting trials in a military danger area would not allow us to calculate these benefits.

We very much would like to operate without the requirement of a TDA, as you suggest, and we therefore continue to work towards the safe integration of UAS operations in collaboration with the wider industry and regulators. However current regulations specify that BVLOS operations must be conducted in unsegregated airspace until UAS has a CAA certified 'see and avoid' solution with equivalent capabilities to that of crewed aircraft.

We would be really happy to organise a visit to the gliding club to discuss this with you and other members, or we could organise a virtual call. Please let us know if this is something you might be interested in.

In the meantime if you have any further questions, please do not hesitate to contact us.

Kind regards



On Thu, 3 Aug 2023 at 12:45, [REDACTED] wrote:
Dear Sir or Madam

I would like to object in the strongest possible way to your proposal for a TDA along the Tyne valley.

It is poorly thought through, with unnecessarily high vertical limits in an already congested area of airspace.

The east coast is a popular transit route avoiding controlled airspace. The west end or "Hexham gap" as it is known, is also a useful transit area tightly woven between established military danger areas and controlled airspace.

Your previous trial along the east coast was also unnecessarily greedy - the majority of your routes were out to sea, yet you still took up to 800ft amsl. Why? The drone could quite happily fly below 400ft out there without affecting anybody.

Speaking as a professional pilot, flying instructor, skydiving jump-pilot, CFI of Northumbria Gliding Club and aircraft owner, all within the north east, I cannot put into words how incredibly damaging this proposal will be for local aviation.

The general aviation, military aviation and sporting aviation community will lose great swathes of airspace or potentially but themselves at risk by taking unnecessary gambles at the safe crossing of your area in poor weather conditions and rising terrain.

Our airfield, Currock Hill, home of Northumbria Gliding Club is effectively closed off to the north with your TDA.

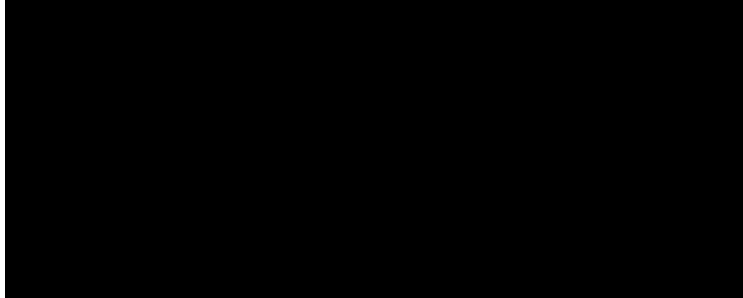
We cannot attempt to cross that area in a glider unless much higher than your upper limit because of the chances of us having to descend into the danger area. We do not have the option of choosing when to climb because we do not have engines. Conditions in the north of England are rarely good enough to be high enough to safely go north with this proposal active.

There are also a number of airfields within your TDA effectively grounded by your trials.

Can I respectfully ask that these trials be reconsidered, and perhaps even conducted from inside the already established military danger areas when not being used by the military?

Overall, I think the common theme is "unnecessary and unsafe".

Kind regards





[Airspace] Objection to Tyne Valley ACP



3 August 2023 at 12:54

Just as one final further point - if the operation is outside of controlled airspace, why do you need a TDA at all? All VFR aircraft operate "see and avoid", not necessarily in receipt of a service from ATC. Any aircraft transiting IFR would be above MSA and therefore above your TDA. There is no requirement for a TDA at all, in my opinion, with no increase in risk.

No TDA, but your continue your low level operation and I think everybody is happy?

Thanks,



- > On 3 Aug 2023, at 12:45, wrote:
- >
- > Dear Sir or Madam
- >
- > I would like to object in the strongest possible way to your proposal for a TDA along the Tyne valley.
- >
- > It is poorly thought through, with unnecessarily high vertical limits in an already congested area of airspace.
- >
- > The east coast is a popular transit route avoiding controlled airspace. The west end or "Hexham gap" as it is known, is also a useful transit area tightly woven between established military danger areas and controlled airspace.
- >
- > Your previous trial along the east coast was also unnecessarily greedy - the majority of your routes were out to sea, yet you still took up to 800ft amsl. Why? The drone could quite happily fly below 400ft out there without affecting anybody.
- >
- > Speaking as a professional pilot, flying instructor, skydiving jump-pilot, CFI of Northumbria Gliding Club and aircraft owner, all within the north east, I cannot put into words how incredibly damaging this proposal will be for local aviation.
- >
- > The general aviation, military aviation and sporting aviation community will lose great swathes of airspace or potentially but themselves at risk by taking unnecessary gambles at the safe crossing of your area in poor weather conditions and rising terrain.
- >
- > Our airfield, Currock Hill, home of Northumbria Gliding Club is effectively closed off to the north with your TDA.
- >
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- >
- > Overall, I think the common theme is "unnecessary and unsafe".
- >
- > Kind regards
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Re: [Airspace] Objection to Tyne Valley ACP

1 message

21 August 2023 at 16:51

Deal 

Thank you for your email, please do not apologise for being direct.

Please be assured that safety is absolutely our priority, for all airspace users. Apian was founded by a team of NHS Doctors and Aviation experts who places safety at the centre of what we do.

We are currently in Stage 1 of the airspace change process, this allows us the opportunity to gain feedback from the wider aviation stakeholders on our proposal. It is not until this stakeholder engagement has been completed that we are able to have a complete view of operations in the area, as data linked to uncertified aerodromes and the GA community can be challenging to obtain. Following stakeholder engagement, we will review all the feedback and reevaluate our proposal.

Our intention is to work with the local GA community, including any local airfields or airstrips, to explore the possibility of operations working alongside each other, we completely understand that this is not always feasible. It is extremely challenging to gain data on the GA operations at uncertified aerodromes, and proves why this stakeholder engagement is an important part of the process. Your insight into the local region is invaluable to us which will help better inform our evaluation.

We have previously successfully demonstrated working in close proximity to microgliding and gliding clubs, and believe we could work with you and the broader GA community to achieve the same in this trial. We are in contact with Hexham and Stanton Airfield and are currently scheduling a visit to discuss our proposed trial in more detail with them.

Current regulations mean that we are required to apply for a TDA, however, we would like to emphasise that we do not see this as a long-term solution and are working in collaboration with the CAA to support the development of integrated airspace that allows equitable use for all airspace users.

In addition to the airspace change process, the UAS operator must receive Operational Authorisation from the CAA prior to the commencement of flight operations. This application will not form part of the airspace change request but is linked to the specific airspace. The Operational Authorisation covers many of the safety aspects that are related to the UAS, procedures and operation itself.

Our UAS operator conducts all operations below 600ft AGL, we will continue to evaluate the airspace requested for operations to ensure that the minimum airspace is being requested. All TDA ceilings should be reported and briefed as AMSL in accordance with ICAO Annex 11 2.30.2.

We would welcome and strongly encourage a discussion with us as we believe it would assist in our understanding of your operations, and sharing the requirement for UAS operations.

If you would like to discuss this with us, please let us know when a convenient time is to contact you for a virtual meeting.

On Fri, 11 Aug 2023 at 10:43, [REDACTED] wrote:

H [REDACTED]

Thanks for your email. It's hard to disguise my frustration with this proposal so I apologise if I'm to the point.

There are several significant questions that you failed to answer that I would appreciate your comments on.

I agree that a TDA is not a long term solution, in fact do not see it as a short term solution either - it's a total non-starter. I believe you should be lobbying the regulator to prove your safety case rather than blindly pushing ahead to the detriment of local airfields, airspace users and volunteer-led community facilities.

As a former air traffic controller you must agree that squeezing more traffic into tighter confines is only going to reduce safety? Safety cannot be a priority for you, unless you mean exclusively to protect the safety of your drone at the detriment to other airspace users?

Your trial *isn't* one step closer to proving it can integrate with other traffic. It's quite the opposite. You are segregating your drone from all other traffic, which will prove nothing.

What about the airfields located directly within your TDA? How do you intend on not affecting operations to and from those airfields?

What about operations from our own airfield, meaning utilising gliding conditions to the north is now severely impacted? It might be of no relevance to your trial, but it certainly is to us.

The east coast trial is a good example of the TDA being excessive. You say the drone operated at 400ft, but out over the sea it could have quite safely operated at say 150-200ft, only flying higher as it approached terrain. Tops could have been reduced to 450ft over the sea. Again, irrespective of current policy at the CAA, a NOTAM advising pilots to be aware of low level drone activity up to 400ft AGL in the region you wish to operate can be the only way forwards to my mind, and I would be happy for a trial on that basis to go ahead. Negotiations with the regulator to change their policy should be the next stage. I can't believe I am the only one to suggest this as an option, so you must have evidence of support from the aviation community on that point. The risk is acceptable to those of us that fly in uncontrolled airspace - in fact there are regular NOTAMs published for military exercises that state military aircraft may not be able to comply with rules of the air, yet we still operate within the same airspace. We already accept the risk of other drone or model aircraft operators flying where we fly - even if they choose to disregard the rules. Even the risk of a bird strike is a fair comparison. There's nothing we can do about that, but lookout.

I appreciate it is early days and you are still gathering feedback, so I see no benefit in meeting with you at this stage. If you are genuinely looking to amend your proposal to reduce the negative impacts on the local aviation community then maybe we can arrange something at a later date, when a more refined proposal is put together.

Thank you.

On 8 Aug 2023, at 15:19, [REDACTED] wrote:

Good afternoon [REDACTED]

Thank you very much for responding with feedback to our proposal. We appreciate the time it has taken to read the material and the constructive feedback you have provided. We would be more than happy to discuss this with you, but in the meantime, we have addressed your points below.

As former Air Traffic Controllers, we understand the need to safely transit within the area. Safety is an absolute priority for Apian and a key part of this is reducing the risk to other airspace users. Your insight, as someone who flies within Northumberland is invaluable and helps us to better understand how the shared airspace can be utilised.

Our priorities are to provide improved healthcare for patients and clinicians, but we also want to work collaboratively with local aviation. This trial is one step closer to proving UAS can do this and at the same time integrate safely with crewed aviation. Current regulations mean that we are required to apply for a TDA, however, we would like to emphasise that we do not see this as a long-term solution and are working in collaboration with the CAA to support the development of integrated airspace that allows equitable use for all airspace users.

With reference to our previous trial, the TDA was segmented into 3 sections to support the access for emergency services and military on operations. We operated over the sea due to feedback from stakeholder engagement and to minimise impact on other airspace users, although this was not our optimal routing. Those segments were 650ft AMSL over sea and 850ft over land to allow for safe segregation against aviation that may be operating at 650ft whilst the aircraft operated at 400ft.

Apian is co-founded by NHS Doctors, and as such, all our trials are focused around identifying, demonstrating and implementing the real benefits to patients and clinicians as we integrate all our operations directly into the NHS. Conducting trials in a military danger area would not allow us to calculate these benefits.

We very much would like to operate without the requirement of a TDA, as you suggest, and we therefore continue to work towards the safe integration of UAS operations in collaboration with the wider industry and regulators. However current regulations specify that BVLOS operations must be conducted in unsegregated airspace until UAS has a CAA certified 'see and avoid' solution with equivalent capabilities to that of crewed aircraft.

We would be really happy to organise a visit to the gliding club to discuss this with you and other members, or we could organise a virtual call. Please let us know if this is something you might be interested in.
In the meantime if you have any further questions, please do not hesitate to contact us.

Kind regards



On Thu, 3 Aug 2023 at 12:45, [REDACTED] wrote:

Dear Sir or Madam

I would like to object in the strongest possible way to your proposal for a TDA along the Tyne valley.

It is poorly thought through, with unnecessarily high vertical limits in an already congested area of airspace.

The east coast is a popular transit route avoiding controlled airspace. The west end or "Hexham gap" as it is known, is also a useful transit area tightly woven between established military danger areas and controlled airspace.

Your previous trial along the east coast was also unnecessarily greedy - the majority of your routes were out to sea, yet you still took up to 800ft amsl. Why? The drone could quite happily fly below 400ft out there without affecting anybody.

Speaking as a professional pilot, flying instructor, skydiving jump-pilot, CFI of Northumbria Gliding Club and aircraft owner, all within the north east, I cannot put into words how incredibly damaging this proposal will be for local aviation.

The general aviation, military aviation and sporting aviation community will lose great swathes of airspace or potentially but themselves at risk by taking unnecessary gambles at the safe crossing of your area in poor weather conditions and rising terrain.

Our airfield, Currock Hill, home of Northumbria Gliding Club is effectively closed off to the north with your TDA.

We cannot attempt to cross that area in a glider unless much higher than your upper limit because of the chances of us having to descend into the danger area. We do not have the option of choosing when to climb because we do not have engines. Conditions in the north of England are rarely good enough to be high enough to safely go north with this proposal active.

There are also a number of airfields within your TDA effectively grounded by your trials.

Can I respectfully ask that these trials be reconsidered, and perhaps even conducted from inside

the already established military danger areas when not being used by the military?

Overall, I think the common theme is "unnecessary and unsafe".

Kind regards






[Airspace] Objection to Tyne Valley ACP



8 August 2023 at 15:19

Good afternoon 

Thank you very much for responding with feedback to our proposal. We appreciate the time it has taken to read the material and the constructive feedback you have provided. We would be more than happy to discuss this with you, but in the meantime, we have addressed your points below.

As former Air Traffic Controllers, we understand the need to safely transit within the area. Safety is an absolute priority for Apian and a key part of this is reducing the risk to other airspace users. Your insight, as someone who flies within Northumberland is invaluable and helps us to better understand how the shared airspace can be utilised.

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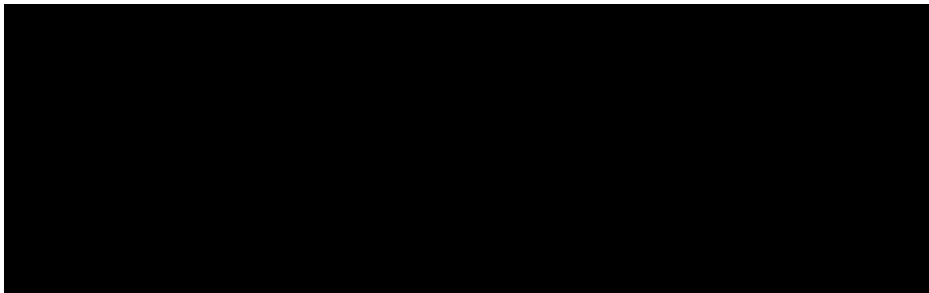
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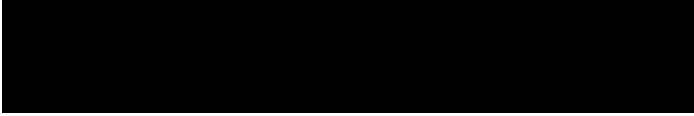
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Kind regards





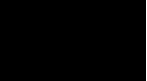
[Airspace] Proposed ACP - Northumbria TDA

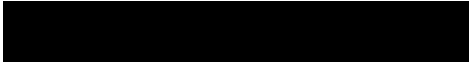


3 August 2023 at 16:47

I object strongly to the proposed airspace change on the basis that, firstly, as a GA pilot operating in that area, I am of the view that the large area of airspace being proposed will create significant and dangerous “pinch points” in the busy airspace surrounding the Newcastle CTR.

In addition, it will severely restrict operations from an existing user of this airspace, the [redacted] at [redacted] who require access to low level areas to the north & west of their site for routine cross country flights.






[Airspace] Proposed ACP - Northumbria TDA



8 August 2023 at 15:31

Good afternoon 

Thank you very much for responding with feedback to our proposal. We appreciate the time it has taken to read the material and the constructive feedback you have provided. We would be more than happy to meet and discuss this with you, but in the meantime, we have addressed your points below.

As former Air Traffic Controllers, we understand the need to safely transit within the area. However, your insights as someone who flies within Northumberland, is invaluable and helps us to better understand how the shared airspace can be utilised. This is why the stakeholder feedback is a critical and important step in our airspace change process.

Current regulations require us to conduct the initial flights in segregated airspace, however, we would like to emphasise that we do not see this as a long-term solution and are working in collaboration with the CAA to support the development of integrated airspace that allows equitable use for all airspace users.

We have previously successfully demonstrated working in close proximity to microgliding and gliding clubs, and believe we could work with you and the broader GA community to achieve the same in this trial.

Apian is co-founded by NHS Doctors, and as such, all our trials are focused around identifying the real benefits to patients and clinicians as we integrate all our operations directly into the NHS.

If you have any further questions or would like to schedule a meeting with either our healthcare or aviation team, please do not hesitate to contact us.

Kind regards





[Airspace] Complaint.

3 August 2023 at 19:01

Bottom Line. I object to the ACP in the strongest terms as the TDA design completely fails to adhere to the CAA requirement to minimise impact on other air users. It closes two grass airstrips, blocks the busy East Coast VFR coastal transit route under the Newcastle CTA, creates choke points that will result in a large increase in traffic seeking Newcastle zone transits/Spadeadam D510 crossings and is unreasonable in its vertical planning, extending to around 1500ft AGL in the busy Tyne Valley transit route.

Area B

The East coastline under the base of the 1500ft Newcastle CTA is a busy transit route for VFR GA traffic and also allows non-radio traffic to move freely. Area B (SFC-1300ft) effectively blocks this route and will force east coast traffic to seek a formal zone transit with Newcastle ATC at a time when Newcastle ATC is short-staffed and operating with reduced hours. The only option for non-radio traffic will be to head 4 miles out to sea, significantly increasing risk for these air users who are traditionally historic aircraft or basic microlights.

Area C & D

When active, Area C closes the Hexham and Stanton airstrips that have operated for many years and are home to a variety of LAA, BMAA and historic aircraft.

The design uses a blunt approach of 600ft AGL above tallest known feature within the TDA, giving 1750ft AMSL in Area C and 2000ft AMSL in Area D. This results in much of the TDA being 1000ft-1500ft AGL rather than the desired/claimed 600ft AGL. The Tyne valley is a primary coast-to-coast transit route for both civil and military traffic in the North and the proposed 1750ft/2000ft TDA base will prevent 500ft-1000ft AGL valley transits when the cloud base is low. This will severely restrict GA coast-to-coast access.

DACS

Apian claim "Due to the heights of the proposed TDA complex (600 ft AGL above the tallest known feature), a Danger Area Crossing Service (DACS) will not be provided." A DACS would allow both Stanton and Hexham to operate whilst allowing the continued flow of the busy Coastal and Tyne Valley VFR transit routes which can achieve 1000ft AGL within the majority of the TDA. The onus should be on Apian to resolve rather than a disingenuous and misleading statement.

TDA Activation

During previous UAS operations on the Northumberland Coast, I didn't see any evidence that Apian cancelled TDA activation by fresh Notam when operations were suspended for weather or serviceability, often for days on end. Instead airspace remained blocked to other users despite it being unused for days. Apian should release airspace once it is clear operations will be suspended.

Summary

The extensive nature of this TDA will severely and negatively impact other air users in Northern England. I believe this trial only becomes viable when certified Detect and Avoid Technology is available enabling co-existence rather than implementation via a TDA. By progressing the TDA option, the wider flying community is being hugely restricted and put at significant risk which is totally unacceptable.



[Airspace] Complaint.

11 August 2023 at 10:05

Dear [REDACTED]

Thank you very much for responding with feedback on our proposal. We appreciate the time it has taken to read the material and the constructive feedback you have provided. We would be more than happy to meet and discuss this with you, but in the meantime, we have addressed your points below.

As previous air traffic controllers we have knowledge of and appreciate the restrictions you might face when flying, and getting a perspective from a pilot who flies in the local area is extremely important. Your feedback will help us continue the airspace change process by taking into consideration the feedback we have received to develop a more refined airspace.

Our intention is to work with the local GA community, including any local airfields or airstrips, to explore the possibility of operations working alongside each other, we completely understand that this is not always feasible. It is extremely challenging to gain data on the GA operations at uncertified aerodromes, and this proves why stakeholder engagement is an important part of the process. We have previously successfully demonstrated working in close proximity to microgliding and gliding clubs, and believe we could work with you and the broader GA community to achieve the same in this trial.

Apian is being supported and guided by Newcastle International Airport ATC regarding operations in close proximity to Newcastle Airport. We will continue to re-evaluate the DACS and DAAIS requirements based on feedback from the aviation community and refinement of the airspace.

Apian was founded by two NHS doctors, and all of our work is focused on providing improved healthcare to our patients and clinicians. We are working directly with the Northumbria Healthcare NHS Foundation Trust, to provide an on-demand delivery service in the most rural NHS Trust in England. The airspace proposed is directly linked to the use case requirements which are outlined in Annex B.

Current regulations mean that we are required to apply for a TDA, however, we would like to emphasise that we do not see this as a long-term solution and are working in collaboration with the CAA to support the development of integrated airspace that allows equitable use for all airspace users. Our UAS operator intends to seek CAA guidance on compliantly deploying detect and avoid technology to remove the need for segregated airspace, in line with the Airspace Modernisation Strategy

Regarding NOTAMs in our previous trial, these were cancelled by the UAS operator directly when we did not anticipate flying. As per the NOTAM process, these were cancelled through the Airspace Regulation (Utilisation) Operations team at the CAA, who communicate them to the aviation industry. Cancellations of usage for the TDA were due to daily limitations (i.e. weather), which is why cancellations were not seen in advance as we utilised the TDA to complete as many deliveries and capture as much data for the NHS as possible. If you have suggestions to improve the safe sharing of this information, please let us know and we can discuss them with the CAA.

If you have any further questions or would like to schedule a meeting with either our healthcare or aviation team, please do not hesitate to contact us.

Kind regards

On Thu, 3 Aug 2023 at 19:06, [REDACTED]

[Quoted text hidden]

rote:



Re: [Airspace] Feedback Ref ACP-2023-015

1 message

11 August 2023 at 11:00

Dear [REDACTED]

Thank you for your reply. I would be happy to meet and discuss further if that is a practical option. Alternatively I will provide detailed further comments on the information kindly provided below.

In brief, I see common ground on the need to move away from a TDA and the need to re-evaluate (I would say provide) DACS/DAAIS. The areas in discussion are the extent and locations of the TDA zones. In particular:

1. Reshaping or relocating the northern boundaries of Zones B and C 2 miles further South (south of Pigdon) would avoid limiting or stopping operations at Stanton
2. Similarly, modifying the Southern boundaries of C could release Hexham from the issue
3. Reducing vertical extents to something more sensible and in line with the max 400 AGL drone operation
4. Reducing the overall size of the area affected where practical - allowing an East-West valley corridor would be particularly beneficial

Kind regards,

On Wed, 9 Aug 2023 at 12:01 [REDACTED] wrote:

Dear [REDACTED]

Thank you very much for responding with feedback to our proposal. We appreciate the time it has taken to read the material and the constructive feedback you have provided. We would be more than happy to meet and discuss this with you, but in the meantime, we have addressed your points below.

As former Air Traffic Controllers, we understand the need to safely transit within the area. However, your insight as someone who flies within Northumberland is invaluable and helps us to better understand how the shared airspace can be utilised.

Current regulations mean that we are required to apply for a TDA, however, we would like to emphasise that we do not see this as a long-term solution and are working in collaboration with the CAA to support the development of integrated airspace that allows equitable use for all airspace users.

Our intention is to work with the local GA community, including any local airfields or airstrips, to explore the possibility of operations working alongside each other, we completely understand that this is not always feasible. It is extremely challenging to gain data on the GA operations at uncertified aerodromes and proves why the stakeholder engagement is an important part of the process. We have previously successfully demonstrated working in close proximity to microgliding and gliding clubs, and believe we could work with you and the broader GA community to achieve the same in this trial. The airfields you reference have been included in our stakeholder engagement and come under general aviation, personal email addresses are excluded from the documentation, we will add the airfield names to the Annex in future versions of the trial plan to ensure other readers are aware of our engagement with them.

Apian is being supported and guided by Newcastle International Airport ATC regarding operations in close proximity to Newcastle Airport. We will continue to re-evaluate the DACS and DAAIS requirements based on feedback from the aviation community and refinement of the airspace.

Apian was founded by two NHS doctors, and all of our work is focused on providing improved healthcare to our patients and clinicians. We are working directly with the Northumbria Healthcare NHS Foundation Trust, to provide an on-demand delivery service in the most rural NHS Trust in England. The airspace proposed is directly linked to the use case requirements which are outlined in Annex B.

Regarding NOTAMs in our previous trial, these were cancelled by the UAS operator directly when we did not anticipate flying. As per the NOTAM process, these were cancelled through the Airspace Regulation (Utilisation)

Operations team at the CAA, who communicate them to the aviation industry. Cancellations of usage for the TDA were due to daily limitations (i.e. weather), which is why cancellations were not seen in advance as we utilised the TDA to complete as many deliveries, and capture as much data for the NHS as possible. If you have suggestions to improve the safe sharing of this information, please let us know and we can discuss them with the CAA.

To ensure you get the latest news relating to the trial, including publications regarding changes to timelines, you can subscribe to updates on ACP-2023-015 through the Airspace Change Portal. We will also include you in our communications with stakeholders going forward.

If you have any further questions or would like to schedule a meeting with either our healthcare or aviation team, please do not hesitate to contact us.

Kind regards

On Thu, 3 Aug 2023 at 14:43, [REDACTED] wrote:

H [REDACTED]

Thank you very much for your email.

We appreciate the time you have taken to respond to our stakeholder engagement, and want to assure you that we are committed to reviewing and responding to all feedback received. We anticipate getting back to you within 3 working days. In the meantime, if you would like to talk to one of our team, please respond to this email and we will contact you.

On Thu, 3 Aug 2023 at 13:56, [REDACTED] wrote:

Hello

Please see attached feedback in regards to ACP-2023-015. Please acknowledge receipt of the completed feedback and include it in the airspace change process.

--

Name: [REDACTED]

Email: [REDACTED]

Representing: [REDACTED]

Address: [REDACTED]

Feedback: Objection to airspace change ACP-2023-015

I have been following the developments in the Northeast apian drone trial. Following the belated publication of the Trial Plan and feedback form, I wish to object to the proposed TDA arrangement. I believe the proposal is unworkable in its current form. The impact of the proposal on other airspace users would be catastrophic and completely at odds with the ethos of the Civil Aviation Authority and the culture of UK aviation to enable access to and integrate users within airspace whenever practical. My concerns cover various areas including the closure of long-established airstrips, direct impact on flight safety of other airspace users from the proposal, denial of a huge active area of airspace to other airspace users and lack of willingness to integrate or work with those so impacted. I shall expand on these points below.

Impact on Airstrips

Zone C covers the Stanton farm and Hexham airstrips forcing flying operations to cease and impacting local business. Both these airstrips are long established and host a variety of aircraft including historic types. I believe it would be unprecedented in UK aviation for an “airspace trial” proposal to forcefully close established airfields. I do not understand why these airstrips have not been added to the identified stakeholders in Annex C of the proposal.

Flight Safety

The large volume of airspace includes critical areas for VFR navigation in the region and wider air routes. Zone B removes the coastal below 1500ft route under the Newcastle CTA. The Newcastle CTA is busy airspace currently impacted by ATC staff shortages and for that and other reasons control zone transits are not always practical. This would only leave the option for North to South as routing miles out to sea – hardly ideal for historic and microlight single engine aircraft. On Zone C and Zone D, the Tyne valley is often the only possible VFR navigation route from East to West given the geography of the area and the associated cloud base. Even on the rare occasions that isn't the case, the Spadeadam danger areas and mountainous terrain mean it is the only sensible one.

Scope of Airspace

The scale of this proposed airspace grab is massive. It smothers every key VFR route in the wider area of the Newcastle zone. The broad method of calculation means the vertical extent has been significantly expanded from the standard drone 400 ft AGL to the point where it has a negative impact on transiting aircraft. The Northeast climate oftens results in a relatively low cloud base throughout the year meaning an obvious conflict for VFR navigation. I would think a much smaller tunnel of airspace could accommodation a drone going backwards and forwards. By comparison manned aircraft are often required to operate accurately in small corridors of airspace at precise altitude.

Integration

By simply excluding other airspace users from their home airspace or preventing others getting to their planned destination, it is clear there is no intent demonstrated in this proposal to integrate with other airspace users. When one also factors in the unwillingness to provide a danger area crossing service, the huge TDA covering critical routes, the 24/7 proposed operation and concerns raised about airspace not being released when not required (by NOTAM) in the previous trial, it cannot be viewed as a reasonable proposal. I understand it is also contrary to the stated goals of the CAA as described in CAP2533.

I trust that these concerns will be included in the airspace change process, provided to the CAA as part of the stakeholder consultation and taken into consideration in line with the proposal. As I am personally impacted by the proposal, I request to be kept up to date wherever possible within the framework and process.





Re: [Airspace] Feedback Ref ACP-2023-015

1 message

17 August 2023 at 15:36

Dear [REDACTED]

Thank you very kindly for your response and further comments. We will consider them all as part of our reevaluation following stakeholder engagement.

We look forward to discussing these in more detail with you next week at the feedback session.

Kind regards

[REDACTED]

On Fri, 11 Aug 2023 at 11:01 [REDACTED] wrote:

Dear [REDACTED]

Thank you for your reply. I would be happy to meet and discuss further if that is a practical option. Alternatively I will provide detailed further comments on the information kindly provided below.

In brief, I see common ground on the need to move away from a TDA and the need to re-evaluate (I would say provide) DACS/DAAIS. The areas in discussion are the extent and locations of the TDA zones. In particular:

1. Reshaping or relocating the northern boundaries of Zones B and C 2 miles further South (south of Pigdon) would avoid limiting or stopping operations at Stanton
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[REDACTED]

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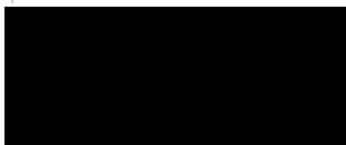
Apian was founded by two NHS doctors, and all of our work is focused on providing improved healthcare to our patients and clinicians. We are working directly with the Northumbria Healthcare NHS Foundation Trust, to provide an on-demand delivery service in the most rural NHS Trust in England. The airspace proposed is directly linked to the use case requirements which are outlined in Annex B.

Regarding NOTAMs in our previous trial, these were cancelled by the UAS operator directly when we did not anticipate flying. As per the NOTAM process, these were cancelled through the Airspace Regulation (Utilisation) Operations team at the CAA, who communicate them to the aviation industry. Cancellations of usage for the TDA were due to daily limitations (i.e. weather), which is why cancellations were not seen in advance as we utilised the TDA to complete as many deliveries, and capture as much data for the NHS as possible. If you have suggestions to improve the safe sharing of this information, please let us know and we can discuss them with the CAA.

To ensure you get the latest news relating to the trial, including publications regarding changes to timelines, you can subscribe to updates on ACP-2023-015 through the Airspace Change Portal. We will also include you in our communications with stakeholders going forward.

If you have any further questions or would like to schedule a meeting with either our healthcare or aviation team, please do not hesitate to contact us.

Kind regards



On Thu, 3 Aug 2023 at 14:43 [REDACTED] wrote:

Hi [REDACTED]

Thank you very much for your email.

We appreciate the time you have taken to respond to our stakeholder engagement, and want to assure you that we are committed to reviewing and responding to all feedback received. We anticipate getting back to you within 3 working days. In the meantime, if you would like to talk to one of our team, please respond to this email and we will contact you.

On Thu, 3 Aug 2023 at 13:56 [REDACTED] wrote:

Hello

Please see attached feedback in regards to ACP-2023-015. Please acknowledge receipt of the completed feedback and include it in the airspace change process.



--



[Airspace] Feedback Ref ACP-2023-015

9 August 2023 at 12:01

Dear 

Thank you very much for responding with feedback to our proposal. We appreciate the time it has taken to read the material and the constructive feedback you have provided. We would be more than happy to meet and discuss this with you, but in the meantime, we have addressed your points below.

As former Air Traffic Controllers, we understand the need to safely transit within the area. However, your insight as someone who flies within Northumberland is invaluable and helps us to better understand how the shared airspace can be utilised.

Current regulations mean that we are required to apply for a TDA, however, we would like to emphasise that we do not see this as a long-term solution and are working in collaboration with the CAA to support the development of integrated airspace that allows equitable use for all airspace users.

Our intention is to work with the local GA community, including any local airfields or airstrips, to explore the possibility of operations working alongside each other, we completely understand that this is not always feasible. It is extremely challenging to gain data on the GA operations at uncertified aerodromes and proves why the stakeholder engagement is an important part of the process. We have previously successfully demonstrated working in close proximity to microgliding and gliding clubs, and believe we could work with you and the broader GA community to achieve the same in this trial. The airfields you reference have been included in our stakeholder engagement and come under general aviation, personal email addresses are excluded from the documentation, we will add the airfield names to the Annex in future versions of the trial plan to ensure other readers are aware of our engagement with them.

Apian is being supported and guided by Newcastle International Airport ATC regarding operations in close proximity to Newcastle Airport. We will continue to re-evaluate the DACS and DAAIS requirements based on feedback from the aviation community and refinement of the airspace.

Apian was founded by two NHS doctors, and all of our work is focused on providing improved healthcare to our patients and clinicians. We are working directly with the Northumbria Healthcare NHS Foundation Trust, to provide an on-demand delivery service in the most rural NHS Trust in England. The airspace proposed is directly linked to the use case requirements which are outlined in Annex B.

Regarding NOTAMs in our previous trial, these were cancelled by the UAS operator directly when we did not anticipate flying. As per the NOTAM process, these were cancelled through the Airspace Regulation (Utilisation) Operations team at the CAA, who communicate them to the aviation industry. Cancellations of usage for the TDA were due to daily limitations (i.e. weather), which is why cancellations were not seen in advance as we utilised the TDA to complete as many deliveries, and capture as much data for the NHS as possible. If you have suggestions to improve the safe sharing of this information, please let us know and we can discuss them with the CAA.

To ensure you get the latest news relating to the trial, including publications regarding changes to timelines, you can subscribe to updates on ACP-2023-015 through the Airspace Change Portal. We will also include you in our communications with stakeholders going forward.

If you have any further questions or would like to schedule a meeting with either our healthcare or aviation team, please do not hesitate to contact us.

Kind regards



[Quoted text hidden]



[Airspace] ACP-2023-015 Feedback



3 August 2023 at 20:20

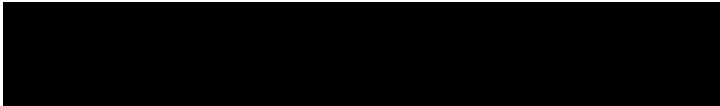
Dear [Redacted]

please see attached my objection to the extensive TDA detailed in ACP 2023-015.

I am an [Redacted] based GA pilot who flies extensively in the affected area.

I am a frequent visitor to both the Stanton and Hexham strips that would be forced to be closed under your proposals. Further, like many others, I regularly use the key East coast transit route under the Newcastle CTA that you plan to block and also the important Tyne Valley coast-to-coast transit route which, during TDA activation, will also become impossible to traverse with a cloud base of 2000ft and below.

Thank you.



Bottom Line. I object to the ACP in the strongest terms as the TDA design completely fails to adhere to the CAA requirement to minimise impact on other air users. It closes two grass airstrips, blocks the busy East Coast VFR coastal transit route under the Newcastle CTA, creates choke points that will result in a large increase in traffic seeking Newcastle zone transits/Spadeadam D510 crossings and is unreasonable in its vertical planning, extending to around 1500ft AGL in the busy Tyne Valley transit route.

Area B

The East coastline under the base of the 1500ft Newcastle CTA is a busy transit route for VFR GA traffic and also allows non-radio traffic to move freely. Area B (SFC-1300ft) effectively blocks this route and will force east coast traffic to seek a formal zone transit with Newcastle ATC at a time when Newcastle ATC is short-staffed and operating with reduced hours. The only option for non-radio traffic will be to head 4 miles out to sea, significantly increasing risk for these air users who are traditionally historic aircraft or basic microlights.

Area C & D

When active, Area C closes the Hexham and Stanton airstrips that have operated for many years and are home to a variety of LAA, BMAA and historic aircraft.

The design uses a blunt approach of 600ft AGL above tallest known feature, giving 1750ft AMSL in Area C and 2000ft AMSL in Area D which results in much of the TDA being 1000ft-1500ft AGL rather than the desired/claimed 600ft AGL. The Tyne valley is a primary coast-to-coast transit route for both civil and military traffic in the North and the proposed 1750ft/2000ft AMSL TDA base will prevent 500ft-1000ft AGL valley transits when the cloud base is low. This will severely restrict GA coast-to-coast access.

DACS

Apian claim "Due to the heights of the proposed TDA complex (600 ft AGL above the tallest known feature), a Danger Area Crossing Service (DACS) will not be provided." A DACS would allow both Stanton and Hexham to operate whilst allowing the continued flow of the busy Coastal and Tyne Valley VFR transit routes which can achieve 1000ft AGL within the majority of the TDA. The onus should be on Apian to resolve rather than a disingenuous and misleading statement.

TDA Activation

During previous Apian UAS operations on the Northumberland Coast (ACP-2022-031), I didn't see any evidence that Apian cancelled TDA activation by fresh Notam when operations were suspended for weather or serviceability, often for days on end. Instead airspace remained blocked to other users despite it being unused for days. Apian should release airspace once it is clear operations will be suspended. In the interest of transparency, Airspace usage statistics (days/hours flown v days/hours Notamed) should be publicly available to both the GA community and the regulator.

Summary

The extensive and disproportionate nature of this TDA will severely and negatively impact other air users in Northern England. I believe this trial only becomes viable when certified Detect and Avoid Technology is available enabling co-existence rather than implementation via a TDA. By progressing the TDA option, the wider flying community is being hugely restricted and put at significant risk which is totally unacceptable.



[Airspace] ACP-2023-015 Feedback

11 August 2023 at 10:18

Dear [REDACTED]

Thank you very much for responding with feedback on our proposal. We appreciate the time it has taken to read the material and the constructive feedback you have provided. We would be more than happy to meet and discuss this with you, but in the meantime, we have addressed your points below.

As previous air traffic controllers we have knowledge of and appreciate the restrictions you might face when flying, and getting a perspective from a pilot who flies in the local area is extremely important. Your feedback will help us continue the airspace change process by taking into consideration the feedback we have received to develop a more refined airspace.

Our intention is to work with the local GA community, including any local airfields or airstrips, to explore the possibility of operations working alongside each other, we completely understand that this is not always feasible. It is extremely challenging to gain data on the GA operations at uncertified aerodromes, and proves why stakeholder engagement is an important part of the process. We have previously successfully demonstrated working in close proximity to microgliding and gliding clubs, and believe we could work with you and the broader GA community to achieve the same in this trial.

Apian is being supported and guided by Newcastle International Airport ATC regarding operations in close proximity to Newcastle Airport. We will continue to re-evaluate the DACS and DAAIS requirements based on feedback from the aviation community and refinement of the airspace.

Apian was founded by two NHS doctors, and all of our work is focused on providing improved healthcare to our patients and clinicians. We are working directly with the Northumbria Healthcare NHS Foundation Trust, to provide an on-demand delivery service in the most rural NHS Trust in England. The airspace proposed is directly linked to the use case requirements which are outlined in Annex B.

Current regulations mean that we are required to apply for a TDA, however, we would like to emphasise that we do not see this as a long-term solution and are working in collaboration with the CAA to support the development of integrated airspace that allows equitable use for all airspace users. Our UAS operator intends to seek CAA guidance on compliantly deploying detect and avoid technology to remove the need for segregated airspace, in line with the Airspace Modernisation Strategy

Regarding NOTAMs in our previous trial, these were cancelled by the UAS operator directly when we did not anticipate flying. As per the NOTAM process, these were cancelled through the Airspace Regulation (Utilisation) Operations team at the CAA, who communicate them to the aviation industry. Cancellations of usage for the TDA were due to daily limitations (i.e. weather), which is why cancellations were not seen in advance as we utilised the TDA to complete as many deliveries and capture as much data for the NHS as possible. If you have suggestions to improve the safe sharing of this information, please let us know and we can discuss them with the CAA.

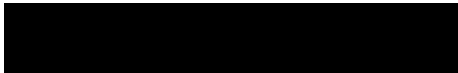
If you have any further questions or would like to schedule a meeting with either our healthcare or aviation team, please do not hesitate to contact us.

Kind regards

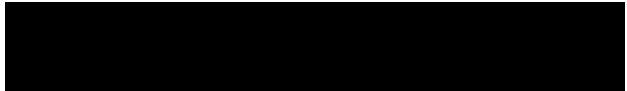
On Thu, 3 Aug 2023 at 20:21 [REDACTED]

[Quoted text hidden]

[REDACTED] wrote:



[Airspace] Airspace change



4 August 2023 at 08:34

Good morning my name is [REDACTED] I am the secretary of the [REDACTED] could you tell me how these changes will affect our flying club and others in this area
Thanks.

Sent from my Galaxy



Re: [Airspace] I am sharing 'ACP-2023-015 feedback form' with you

1 message



11 August 2023 at 12:42

Dear 

Thank you so much for your email.

From our proposed area of operations, as indicated in the trial plan, we believe that Cramlington Model Flying Club is located within this airspace.


We want to assure you that if our proposal is approved, we have no intention to restrict your activities. We have experience working with other aviation operators, including model aero clubs to allow safe integration within the same airspace in previous similar trials.

It would be extremely helpful if you could let me know when a convenient time is to call you to discuss your operations in more detail, this will allow us to review and determine if a Letter of Agreement is required.

We look forward to hearing from you,

Kind regards,



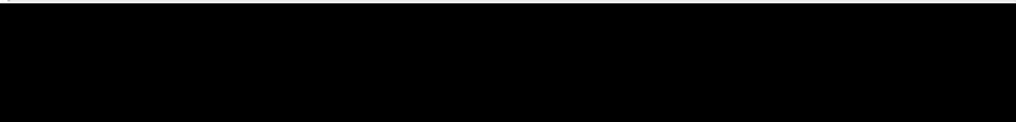
On Fri, 4 Aug 2023 at 08:43,  wrote:

Sent from my Galaxy



Re: [Airspace] Stakeholder Feedback Form.

1 message



11 August 2023 at 12:46

Dear

Thank you very much for responding with feedback on our proposal. We appreciate the time it has taken to read the material and the constructive feedback you have provided.

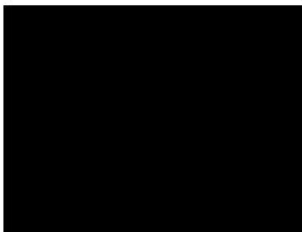
Our intention is to work with the local GA community, including any local airfields or airstrips, to explore the possibility of operations working alongside each other. It is extremely challenging to gain data on the GA operations at uncertified aerodromes, and proves why stakeholder engagement is an important part of the process so thank you again for contacting us.

We have previously successfully demonstrated working in close proximity to microgliding and gliding clubs, and believe we could work with you and the broader GA community to achieve the same in this trial. We are in contact with Hexham and Stanton Airfield and are currently scheduling a visit to discuss our proposed trial in more detail with them.

We, like the CAA and as I'm sure you do, believe that being able to share the airspace is ultimately the best solution for all stakeholders and this is a step along that path.

If you have any further questions or would like to schedule a meeting with either our healthcare or aviation team, please do not hesitate to contact us.

Kind regards



On Fri, 4 Aug 2023 at 09:07, wrote:

From:
Sent: 04 August 2023 09:03
To:
Subject:

Scanned by VIPRE Advanced Threat Protection for Email

Name	[REDACTED]
Email	[REDACTED]
Representing	[REDACTED]
Address (including postcode if possible)	[REDACTED]
Feedback: I am an aircraft owner based at Hexham Airfield. This airfield has been operating for 19 years and it is located within Area C. Due to the proposed TDA restrictions we will be unable to carry on operating from this airstrip. This is a situation I find totally unacceptable and an alternative solution needs to be found to allow normal operations to continue from this site. These restrictions would equally apply to Stanton Airstrip. I look forward to your response.	



[Airspace] ACP Objection

3 August 2023 at 18:55

Hi

I object to the ACP in the strongest terms as the TDA design completely fails to adhere to the CAA requirement to minimise impact on other air users. It closes two grass airstrips, blocks the busy East Coast VFR coastal transit route under the Newcastle CTA, creates choke points that will result in a large increase in traffic seeking Newcastle zone transits/Spadeadam D510 crossings and is unreasonable in its vertical planning, extending to around 1500ft AGL in the busy Tyne Valley transit route.

Area B

The East coastline under the base of the 1500ft Newcastle CTA is a busy transit route for VFR GA traffic and also allows non-radio traffic to move freely. Area B (SFC-1300ft) effectively blocks this route and will force east coast traffic to seek a formal zone transit with Newcastle ATC at a time when Newcastle ATC is short-staffed and operating with reduced hours. The only option for non-radio traffic will be to head 4 miles out to sea, significantly increasing risk for these air users who are traditionally historic aircraft or basic microlights.

Area C & D

When active, Area C closes the Hexham and Stanton airstrips that have operated for many years and are home to a variety of LAA, BMAA and historic aircraft.

The design uses a blunt approach of 600ft AGL above tallest known feature within the TDA, giving 1750ft AMSL in Area C and 2000ft AMSL in Area D. This results in much of the TDA being 1000ft-1500ft AGL rather than the desired/claimed 600ft AGL. The Tyne valley is a primary coast-to-coast transit route for both civil and military traffic in the North and the proposed 1750ft/2000ft TDA base will prevent 500ft-1000ft AGL valley transits when the cloud base is low. This will severely restrict GA coast-to-coast access.

DACS

Apian claim "Due to the heights of the proposed TDA complex (600 ft AGL above the tallest known feature), a Danger Area Crossing Service (DACS) will not be provided.". A DACS would allow both Stanton and Hexham to operate whilst allowing the continued flow of the busy Coastal and Tyne Valley VFR transit routes which can achieve 1000ft AGL within the majority of the TDA. The onus should be on Apian to resolve rather than a disingenuous and misleading statement.

TDA Activation

During previous UAS operations on the Northumberland Coast, I didn't see any evidence that Apian cancelled TDA activation by fresh Notam when operations were suspended for weather or serviceability, often for days on end. Instead airspace remained blocked to other users despite it being unused for days. Apian should release airspace once it is clear operations will be suspended.

Summary

The extensive nature of this TDA will severely and negatively impact other air users in Northern England. I believe this trial only becomes viable when certified Detect and Avoid Technology is available enabling co-existence rather than implementation via a TDA. By progressing the TDA option, the wider flying community is being hugely restricted and put at significant risk which is totally unacceptable.

Thanks very

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Sent from my Android device. Please excuse my brevity.



[Airspace] ACP Objection

11 August 2023 at 10:21

Dear [REDACTED]

Thank you very much for responding with feedback on our proposal. We appreciate the time it has taken to read the material and the constructive feedback you have provided. We would be more than happy to meet and discuss this with you, but in the meantime, we have addressed your points below.

As previous air traffic controllers we have knowledge of and appreciate the restrictions you might face when flying, and getting a perspective from a pilot who flies in the local area is extremely important. Your feedback will help us continue the airspace change process by taking into consideration the feedback we have received to develop a more refined airspace.

Our intention is to work with the local GA community, including any local airfields or airstrips, to explore the possibility of operations working alongside each other, we completely understand that this is not always feasible. It is extremely challenging to gain data on the GA operations at uncertified aerodromes and proves why stakeholder engagement is an important part of the process. We have previously successfully demonstrated working in close proximity to microgliding and gliding clubs, and believe we could work with you and the broader GA community to achieve the same in this trial.

Apian is being supported and guided by Newcastle International Airport ATC regarding operations in close proximity to Newcastle Airport. We will continue to re-evaluate the DACS and DAAIS requirements based on feedback from the aviation community and refinement of the airspace.

Apian was founded by two NHS doctors, and all of our work is focused on providing improved healthcare to our patients and clinicians. We are working directly with the Northumbria Healthcare NHS Foundation Trust, to provide an on-demand delivery service in the most rural NHS Trust in England. The airspace proposed is directly linked to the use case requirements which are outlined in Annex B.

Current regulations mean that we are required to apply for a TDA, however, we would like to emphasise that we do not see this as a long-term solution and are working in collaboration with the CAA to support the development of integrated airspace that allows equitable use for all airspace users. Our UAS operator intends to seek CAA guidance on compliantly deploying detect and avoid technology to remove the need for segregated airspace, in line with the Airspace Modernisation Strategy

Regarding NOTAMs in our previous trial, these were cancelled by the UAS operator directly when we did not anticipate flying. As per the NOTAM process, these were cancelled through the Airspace Regulation (Utilisation) Operations team at the CAA, who communicate them to the aviation industry. Cancellations of usage for the TDA were due to daily limitations (i.e. weather), which is why cancellations were not seen in advance as we utilised the TDA to complete as many deliveries and capture as much data for the NHS as possible. If you have suggestions to improve the safe sharing of this information, please let us know and we can discuss them with the CAA.

If you have any further questions or would like to schedule a meeting with either our healthcare or aviation team, please do not hesitate to contact us.

Kind regards

On Fri, 4 Aug 2023 at 18:57, [REDACTED]

wrote:

[Quoted text hidden]



[Airspace] Request for details of Trial Plan Northumbria Stage 2 ACP-2023-015



7 August 2023 at 12:57

Dea 

Thank you for your email.

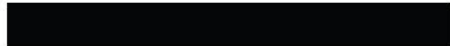
Please find attached our Trial plan, which can also be found on the [CAA Airspace Change Portal ACP-2023-015](#).

As you will see on the link above. ACP-2023-015 is in Stage 1 of the Airspace Change Process. This means we are currently requesting feedback from stakeholders. Our stakeholder engagement is a valuable opportunity for us to gather knowledge and input directly from the aviators who fly within the area and know the Northumbria area best. We welcome any feedback specific to this ACP.

If you have any further questions or would like to schedule a meeting with either our healthcare or aviation team, please do not hesitate to contact us.

Kind regards





[Airspace] Request for details of Trial Plan Northumbria Stage 2 ACP-2023-015



4 August 2023 at 18:41

Dear Sir/Madam,

I have just become aware of the proposed UAV flight trials and large Danger Area across Northumberland.

Please would you send me details of the Risk Assessment for this trial so that I can review it and comment if necessary.

Many thanks.

Yours





[Airspace] ACP-2023-015

5 August 2023 at 10:03

I object to the ACP as the TDA design completely fails to adhere to the CAA requirement to minimise impact on other air users. It closes two grass airstrips, blocks the busy East Coast VFR coastal transit route under the Newcastle CTA, creates choke points that will result in a large increase in traffic seeking Newcastle zone transits/Spadeadam D510 crossings and is unreasonable in its vertical planning, extending to around 1500ft AGL in the busy Tyne Valley transit route.

Area C and D will severely effect gliders which would be unable to use this area which is already one of the few ways of safely

avoiding Newcastle airspace.

I believe this trial only becomes viable when certified Detect and Avoid Technology is available enabling co-existence rather than implementation via a TDA. By using a TDA, the wider flying community is being hugely restricted and put at significant risk



Re: [Airspace] ACP-2023-015

1 message

11 August 2023 at 10:32

Dear [REDACTED]

Thank you very much for responding with feedback on our proposal. We appreciate the time it has taken to read the material and the constructive feedback you have provided. We would be more than happy to meet and discuss this with you, but in the meantime, we have addressed your points below.

As previous air traffic controllers we have knowledge of and appreciate the restrictions you might face when flying, and getting a perspective from a pilot who flies in the local area is extremely important. Your feedback will help us continue the airspace change process by considering the feedback we have received to develop a more refined airspace.

Our intention is to work with the local GA community, including any local airfields or airstrips, to explore the possibility of operations working alongside each other, we completely understand that this is not always feasible. It is extremely challenging to gain data on the GA operations at uncertified aerodromes, and proves why stakeholder engagement is an important part of the process. We have previously successfully demonstrated working in close proximity to microgliding and gliding clubs, and believe we could work with you and the broader GA community to achieve the same in this trial.

Apian is being supported and guided by Newcastle International Airport ATC regarding operations in close proximity to Newcastle Airport. We will continue to re-evaluate the DACS and DAAIS requirements based on feedback from the aviation community and refinement of the airspace.

Apian was founded by two NHS doctors, and all of our work is focused on providing improved healthcare to our patients and clinicians. We are working directly with the Northumbria Healthcare NHS Foundation Trust, to provide an on-demand delivery service in the most rural NHS Trust in England. The airspace proposed is directly linked to the use case requirements which are outlined in Annex B.

Current regulations mean that we are required to apply for a TDA, however, we would like to emphasise that we do not see this as a long-term solution and are working in collaboration with the CAA to support the development of integrated airspace that allows equitable use for all airspace users. Our UAS operator intends to seek CAA guidance on compliantly deploying detect and avoid technology to remove the need for segregated airspace, in line with the Airspace Modernisation Strategy.

If you have any further questions or would like to schedule a meeting with either our healthcare or aviation team, please do not hesitate to contact us.

Kind regards

On Sat, 5 Aug 2023 at 10:03, [REDACTED] wrote:

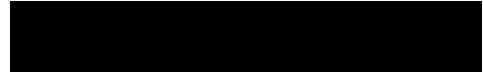
I object to the ACP as the TDA design completely fails to adhere to the CAA requirement to minimise impact on other air users. It closes two grass airstrips, blocks the busy East Coast VFR coastal transit route under the Newcastle CTA, creates choke points that will result in a large increase in traffic seeking Newcastle zone transits/Spadeadam D510 crossings and is unreasonable in its vertical planning, extending to around 1500ft AGL in the busy Tyne Valley transit route.

Area C and D will severely effect gliders which would be unable to use this area which is already one of the few ways of safely

avoiding Newcastle airspace.

I believe this trial only becomes viable when certified Detect and Avoid Technology is available enabling co-existence rather than implementation via a TDA. By using a TDA, the wider flying community is being hugely restricted and put at significant risk

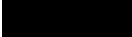




[Airspace] Fwd: Drone trial Northumberland



5 August 2023 at 10:47

Dear 

My minimum weather requirements are to be BELIW cloud which can be low in the proposed TDA, meaning it will create a 'no fly zone' between Spadeadam and 4 miles out to sea on the east coast. The east coast CTA starts at 1500' but allowing for 200' clearance we effectively have a 100' area to fly in (far too narrow).

Why on earth can't you request for corridors rather than trying to grab ALL of the airspace solely for yourselves?

Your last trial was supposed to cancel the TDA by NORAM when flights weren't taking place but the NOTAMS stayed active regardless.

Please explain to me how many people it takes to launch the drone and unload it at the user's end?

And how do the supplies get from the landing site to the hospital please?

Yours sincerely,



Sent from my iPhone

On 4 Aug 2023, at 16:21,  wrote:

[Quoted text hidden]



Re: [Airspace] Fwd: Drone trial Northumberland

1 message

11 August 2023 at 12:52

Dear [REDACTED]

Thank you for taking the time to respond to us. We do really appreciate the feedback from stakeholders, insights from the general aviation operations will help us to refine our requirements and support the development of integrated airspace that allows equitable use for all airspace users.

NOTAMs in our previous trial, these were cancelled by the UAS operator directly when we did not anticipate flying. As per the NOTAM process, these were cancelled through the Airspace Regulation (Utilisation) Operations team at the CAA, who communicate them to the aviation industry. Cancellations of usage for the TDA were due to daily limitations (i.e weather), which is why cancellations were not seen in advance as we utilised the TDA to complete as many deliveries and capture as much data for the NHS as possible. If you have suggestions to improve the safe sharing of this information, please let us know and we can discuss them with the CAA.

We really appreciate your interest in the details of the ground operations and how this is integrated with the NHS, we would happily arrange a meeting to run through the details. This would allow us to answer any follow-up questions you may have, and separate this feedback from that of the airspace change request.

Please let us know your availability and we will happily arrange for members of our aviation and healthcare team to contact you.

Kind regards

On Sat, 5 Aug 2023 at 10:47, [REDACTED] wrote:

Dear [REDACTED]

My minimum weather requirements are to be BELIW cloud which can be low in the proposed TDA, meaning it will create a 'no fly zone' between Spadeadam and 4 miles out to sea on the east coast. The east coast CTA starts at 1500' but allowing for 200' clearance we effectively have a 100' area to fly in (far too narrow).

Why on earth can't you request for corridors rather than trying to grab ALL of the airspace solely for yourselves?

Your last trial was supposed to cancel the TDA by NORAM when flights weren't taking place but the NOTAMS stayed active regardless.

Please explain to me how many people it takes to launch the drone and unload it at the user's end?

And how do the supplies get from the landing site to the hospital please?

Yours sincerely,

[REDACTED]
Sent from my iPhoneOn 4 Aug 2023, at 16:21, Airspace Team <airspace@apian.aero> wrote:

Good afternoon [REDACTED]

Thank you very much for responding with feedback to our proposal. We appreciate the time it has taken to read the material and the constructive feedback you have provided. We would be more than happy to meet and discuss this with you, but in the meantime, we have addressed your points below.

As a former Air Traffic Controller, please be assured that we do understand that weather can affect a planned flight. As someone who flies in Northumbria on a regular basis, the information you have provided us regarding weather conditions is vital in assessing the airspace we are proposing.

Following your comments regarding changes in weather conditions, it would be very useful if you would consider providing any data on the minimum weather conditions you require before you conduct flights, as well as where you gain that weather report from (i.e TAF, METAR, apps).

Current regulations mean that we are required to apply for a TDA, however, we would like to emphasise that we do not see this as a long-term solution and are working in collaboration with the CAA to support the development of integrated airspace that allows equitable use for all airspace users.

Safety is an absolute priority for Apian and a key part of this is reducing the risk to other airspace users. We acknowledge your comments on the potential unfortunate requirement that you may need an emergency landing in our proposed TDA. In this scenario, we would of course follow CAA guidance and would adhere to CAA regulations.

Apian was founded by two NHS doctors, and all of our work is focused on providing improved healthcare to our patients and clinicians. We are working directly with the Northumbria Healthcare NHS Foundation Trust to provide an on-demand delivery service in the most rural NHS Trust in England. For more details on the use case, please see Annex B in the trial engagement material. For clarity, this trial is not affiliated with Amazon in any way.

It is important to understand that whilst the blood bikes provide an essential and critical service to the patients and clinicians within Northumbria, it is run entirely by the goodwill of volunteers. This means they are only able to offer a limited, but vital, service for emergency use during out-of-hours and are unable to support the scale of clinical needs from the NHS. A person in a van would be unsustainable and inefficient given the number of deliveries required.

If you have any further questions or would like to schedule a meeting with either our healthcare or aviation team, please do not hesitate to contact us.

Kind regards

[REDACTED]

On Tue, 1 Aug 2023 at 14:37, [REDACTED] wrote:
Dear [REDACTED]

Thank you so much for taking the time to provide us with feedback about our proposal ACP-2023-015, feedback is extremely important to us. We will review your feedback and get back to you as soon as possible.

In the meantime, please do not hesitate to contact us if you have any questions.

Kind regards

[REDACTED]

On Tue, 1 Aug 2023 at 11:21, [REDACTED] wrote:

Sent from my iPhone

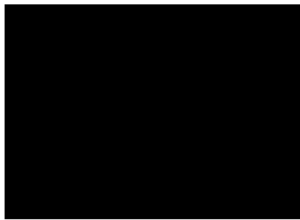
Begin forwarded message:



Dear sirs,

As an aircraft owner I wish to object to the proposed drone trials in the strongest terms:

1. The area is G class airspace (uncontrolled) and allows pilots to navigate south either under controlled airspace along the east coast, or via Hexham to the west. Frequently only one of these routes is viable due to weather conditions. Recently I had to divert along the east route due to bad weather to the west in order to get to my home airfield safely. The trial would deny any of these routes effectively cutting off the airspace north of Hexham / Newcastle / Spadeadam without gaining authority to enter Newcastle controlled airspace.
2. Newcastle ATC rarely allow transits through their airspace due to their workload, meaning the trial would prevent ANY route through to the north or south - how can any respectable company propose such a denial of airspace to every user just to benefit themselves?
3. Losing off vast swathes of airspace from surface level is incredibly dangerous - where does a pilot perform an enforced emergency landing - CERTAINLY NOT IN CONTROLLED AIRSPACE but your proposal leaves no choice!!!
4. If the NHS are so dependant on these supplies how do they manage when the weather prevents flying - surely one person in a van or the FREE blood bike service is a better use of financial resources - or is this trial really aimed at retailers like Amazon???





[Airspace] Proposed Northumbria Danger Area

5 August 2023 at 13:23

Dea [REDACTED]

As a member of Northumbria Gliding Club I must strongly object to the implementation of the proposed Northumbria Danger Area. This will place a severe restriction on our flying activities, in particular it cuts across the track north, which we use as a route to the Borders Gliding Club at Wooler. In addition it severely encroaches on our flying area south of Hexham. Unlike powered aircraft, gliders cannot maintain a constant altitude and therefore could not overfly this area where a land-out is a possibility.

If your scheme cannot operate without such restrictions then it would appear to be a non-starter. In fact, the proposed function should be left to Blood Bikes, which is a free service that already operates successfully in the region.

Regards

[REDACTED]



Re: [Airspace] Proposed Northumbria Danger Area

1 message

11 August 2023 at 14:42

Dear [REDACTED]

Thank you very much for responding with feedback on our proposal. We appreciate the time it has taken to read the material and the constructive feedback you have provided. We would be more than happy to meet and discuss this with you, but in the meantime, we have addressed your points below.

As previous air traffic controllers we have knowledge of and appreciate the restrictions you might face when flying, and getting a perspective from a pilot who flies in the local area is extremely important. Your feedback will help us continue the airspace change process by considering the feedback we have received to develop a more refined airspace.

Our intention is to work with the local GA community, including any local airfields or airstrips, to explore the possibility of operations working alongside each other. We, like the CAA and as I'm sure you do, believe that being able to share the airspace is ultimately the best solution for all stakeholders and this is a step along that path. We have previously successfully demonstrated working in close proximity to microgliding and gliding clubs, and believe we could work with you and the broader GA community to achieve the same in this trial.

If you are able to share detailed data with us on the transits you are referencing that would be greatly appreciated.

Apian was founded by two NHS doctors, and all of our work is focused on providing improved healthcare to our patients and clinicians. We are working directly with the Northumbria Healthcare NHS Foundation Trust to provide an on-demand delivery service for a number of healthcare products, to meet a number of needs in the most rural NHS Trust in England. For more details on the use case, please see Annex B in the trial engagement material.

We are happy to follow up in more detail regarding the benefits Northumbria NHS hope to gain from this trial and how we fit into the broader healthcare ecosystem, including Blood Bikes. This would allow us to answer any follow-up questions you may have, and separate this feedback to that of the airspace change request.

If you have any further questions or would like to schedule a meeting with either our healthcare or aviation team, please do not hesitate to contact us.

Kind regards,

On Sat, 5 Aug 2023 at 13:23 [REDACTED]

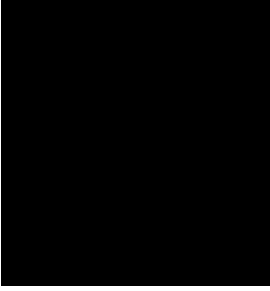
wrote:

Dear [REDACTED]

As a member of [REDACTED] must strongly object to the implementation of the proposed Northumbria Danger Area. This will place a severe restriction on our flying activities, in particular it cuts across the track north, which we use as a route to the Borders Gliding Club at Wooler. In addition it severely encroaches on our flying area south of Hexham. Unlike powered aircraft, gliders cannot maintain a constant altitude and therefore could not overfly this area where a land-out is a possibility.

If your scheme cannot operate without such restrictions then it would appear to be a non-starter. In fact, the proposed function should be left to Blood Bikes, which is a free service that already operates successfully in the region.

Regards



Name [REDACTED]

Representing: Myself

e-mail: [REDACTED]

Address: [REDACTED]

Feedback

I am a microlight flying instructor operating at [REDACTED] and other airfields in the North East of England. I also own and operate a light aircraft based at Eshott airfield.

I would like to register my objection to the proposed ACP-2023-015 with reference to the following points:

1. The huge amount of airspace, laterally and vertically will have severe adverse impact on current users of the airspace, including myself and my students. My personal livelihood and quality of life will be directly impacted, as they were in the previous Apian trial ACP-2022-03.
2. Like many pilots, I am only licenced to fly by Visual Flying Rules in Visual Meteorological Conditions and with regard to UK weather and terrain, I am usually flying, or restricted to flying, at less than 3000 ft AGL, often less than 1000 ft AGL and some of the time at less than 500 ft AGL. Apian drones are not restricted to VMC and by virtue of the TDA will not be restricted to VFR rules, yet Apian have chosen the airspace levels which will have most impact on VFR pilots. The vertical magnitude of the TDAs is massive in comparison to GPS guidance capability. Can it be reduced to reduce impact on other airspace users, for example 100-300 ft AGL?
3. I note that the trial plan is misleading in definition of the vertical magnitude of the TDA areas. It is repeatedly stated that the upper limit is ~600 ft AGL, which may be true for the point of highest terrain but is not true for the majority of the area. Looking at Area D for example, the TDA top is 2000 ft AMSL above the popular Tyne Valley transit route and much higher than 600 ft AGL along the valley. Take Haltwhistle, a commonly used waypoint which is at 413 ft AMSL. This means the TDA top above Haltwhistle is 1587 ft AGL. In the UK, cloud cover is often extensive and cloud base is often close to or below 1587 ft, so transit would not be possible for a high proportion of time.
4. Lateral magnitude of the TDA areas also appears to un-necessarily large for the purpose of flying a GPS guided drone from point to point. Flying my aeroplane North to South would require a crossing above the TDA of not less than 5 nautical miles. Is there some reason why the corridor width cannot be reduced to reduce impact on other airspace users, perhaps 0.5 nautical miles, or less?
5. Area D is also contiguous with Spadeadam's D510B, effectively chocking off any possibility of flying East to West in un-controlled airspace. Crossing D510B is sometimes possible but it is high ground and much more challenging terrain in the event of a forced or precautionary landing. Most pilots choose to fly down the Tyne valley. All of my students, to date, conduct one of their qualifying cross-country flights by flight down the Tyne valley to Kirkbride airfield on the West coast. They are

not licenced to use the radio at this stage of their training and airspace transit is too much un-necessary stress for a student pilot on their first or second cross-country flight. We have one alternative destination to our North but we need 2 destinations for students to qualify. There are no other destination airfields that I regard as safe to send a student pilot to.

6. No Danger Area Crossing Service is proposed for the proposed TDA. Flying over the TDA, whilst securing the option to land clear of the TDA in the event of an engine failure will be impossible except for the rare 'clear blue' days.
7. Area B effectively blocks the option to fly down/up the coast whilst remaining outside controlled airspace. This is a heavily used route for VFR traffic, including myself, and avoids adding burden to Newcastle Radar. The alternative path, crossing Newcastle CTR, is not reliable as crossing may be denied.
8. While the proposed ACP-2023-015 does not consider the needs and wants of existing airspace users, it also does not seem to recognise that there may be other airspace users in future, including drone operators, The Post Office, Amazon, etc. Will all of these have their own separate segregated DAs too?
9. Apian recognises that addition of segregated airspace is not in-line with UK airspace modernisation strategy and is not the ultimate solution to enable drone deliveries. Apian also states that Zipline already has Detect and Avoid technology. Surely it would be better to trial the Detect and Avoid technology and seek CAA approval for the technology first. This would avoid the need at all for any segregated airspace at all. Am I missing something?
10. I believe NOTAMs for the previous Apian trial on the NE coast were not well managed, meaning that there was much time when the TDA was notified as active but the drone was not. I may be wrong and would be grateful to receive your data on % utility of notified airspace. I am expecting the same poor management and communication for the new TDA, so using up valuable airspace for no actual purpose.
11. I have read the published output of the previous NHS trial run by Apian. While activity and achievements are reported there is not a convincing evaluation of using drones compared to existing or other available alternative methods of NHS transport. If evaluation could not be done from the previous trial, is there really any purpose in running another similar trial?
12. The time window of 6 months for the trial seems extremely large for the purpose of establishing whether a drone can fly packages between various points. I and others are bound to question whether this is really a trial or the "thin edge of the wedge" for expanding commercial operations? Those even more suspicious than I will wonder if the association with the NHS is a means for Apian/Zipline to win private airspace that can be exploited more widely in the future.
13. I am extremely excited about the use of flying drones to improve all of our lives in future, but just like autonomous cars, I believe safe integration with other users needs to be proven first.

I hope the above points help Apian, in some way, to develop a strategy for the safe and successful integration of drone traffic in UK airspace.

Best regards

████████████████████



Re: [Airspace] ACP-2023-015 Feedback

1 message

15 August 2023 at 19:57

Dear [REDACTED]

Thank you very much for responding with feedback to our proposal. We appreciate the time it has taken to read the material and the constructive feedback you have provided. We would be more than happy to meet and discuss this with you, but in the meantime, we have addressed your points below.

We have reached out to Athey Moor and Eshott directly and hope to agree a suitable time to visit to discuss our proposal in more detail. We hope that this reassures you our intention is to work with the local GA community, including any local airfields or airstrips, to explore the possibility of operations working alongside each other. We, like the CAA and as I'm sure you do, believe that being able to share the airspace is ultimately the best solution for all stakeholders and this is a step along that path. We have previously safely and successfully demonstrated working in close proximity to microgliding and gliding clubs, and believe we could work with you and the broader GA community to achieve the same in this trial.

As previous air traffic controllers we have knowledge of and appreciate the restrictions you might face when flying, and getting a perspective from a pilot who flies in the local area is extremely important. Your feedback will help us continue the airspace change process by taking into consideration the feedback we have received to develop a more refined airspace.

Current regulations mean that we are required to apply for a TDA, however, we would like to emphasise that we do not see this as a long-term solution and are working in collaboration with the CAA to support the development of integrated airspace that allows equitable use for all airspace users.

Apian is fully supportive of the Airspace Modernisation Strategy, and is working directly with the CAA Innovation team to share any learnings. New and adaptation of policy and regulations can only be advanced following sufficient demonstration and understanding of requirements. All our operations must adhere to current regulations and policies.

Apian was founded by two NHS doctors, and all of our work is focused on providing improved healthcare to our patients and clinicians. We are working directly with the Northumbria Healthcare NHS Foundation Trust, to provide an on-demand delivery service in the most rural NHS Trust in England. This trial builds on the previous trial by demonstrating other use cases that would bring valuable healthcare benefits for our patients and clinicians in the region. This UAS service will add additional capabilities to existing ground couriers. For more details on the use case, please see Annex B in the trial engagement material.

Apian is being supported and guided by Newcastle International ATC regarding operations in close proximity to Newcastle Airport. We will continue to re-evaluate the DACS and DAAIS requirements based on feedback from the aviation community and refinement of the airspace.

Safety is an absolute priority for Apian and a key part of this is reducing the risk to other airspace users. We acknowledge your comments on the potential unfortunate requirement that you may need an emergency landing in our proposed TDA. In this scenario, we would of course follow CAA guidance and adhere to CAA regulations

Our UAS operator conducts all operations below 600ft AGL, we will continue to evaluate the airspace requested for operations to ensure that the minimum airspace is being requested. All TDA ceilings should be reported and briefed as AMSL in accordance with ICAO Annex 11 2.30.2.

In addition to the airspace change process, the UAS operator must receive Operational Authorisation from the CAA prior to the commencement of flight operations. This application will not form part of the airspace change request but is linked to the specific airspace. The Operational Authorisation covers many of the safety aspects that are related to the UAS, procedures and operation itself.

NOTAMs in our previous trial, were cancelled by the UAS operator directly when we did not anticipate flying. As per the NOTAM process, these were cancelled through the Airspace Regulation (Utilisation) Operations team at the CAA, who communicate them to the aviation industry. Cancellations of usage for the TDA were due to daily limitations (i.e.

weather), which is why cancellations were not seen in advance as we utilised the TDA to complete as many deliveries and capture as much data for the NHS as possible. If you have suggestions to improve the safe sharing of this information, please let us know and we can discuss them with the CAA,

CAP1616 outlines the airspace change process for a temporary, trial and permanent airspace change. As stated on page 94, a full airspace change process is required for a trial to be made permanent. This application is for a trial only.

We share your enthusiasm for the use of drones to improve our lives, and strongly agree that safe integration is important. We thank you for your response. If you have any further questions or would like to schedule a meeting with either our healthcare or aviation team in the interim, please do not hesitate to contact us. We hope to see you at Athey Moor in the coming weeks.



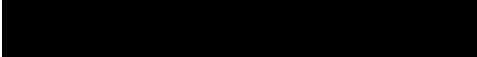
On Sat, 5 Aug 2023 at 15:56, [redacted] wrote:

Dear Sir / Madam,

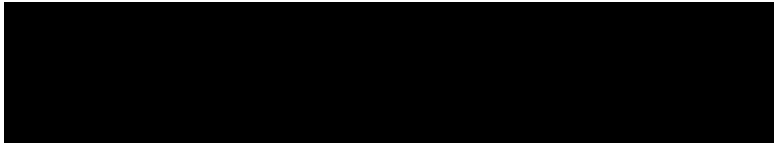
Please find the attached word document.

Best regards





[Airspace] Proposed Northumberland airspace changes



6 August 2023 at 11:11

Hello I am a [redacted] and wish to strongly object to your proposed airspace changes in Northumberland on the grounds of safety for me and my passengers.

I like hundreds of other GA pilots regurly fly south down the coast in the low level route under Newcastles airspace with the option of making an emergency landing on shore if needed and your proposals will block us all from using that route.

If your proposals go ahead we will be forced some 4 miles out to sea with no chance of gliding back to shore if there are any problems hence increasing the risk of ditching in the ice cold North Sea.

I hope you read this email and reconsider your proposal and talk with local GA pilots to find a better solution for all air users.



Sent from my Galaxy



Re: [Airspace] Proposed Northumberland airspace changes

1 message

11 August 2023 at 12:56

Dear [REDACTED]

Thank you very much for responding with feedback on our proposal. We appreciate the time it has taken to read the material and the constructive feedback you have provided. We would be more than happy to meet and discuss this with you, but in the meantime, we have addressed your points below.

As previous air traffic controllers we have knowledge of and appreciate the restrictions you might face when flying, and getting a perspective from a pilot who flies in the local area is extremely important. Your feedback will help us continue the airspace change process by considering the feedback we have received to develop a more refined airspace.

We have reached out to Athey Moor directly and hope to agree on a suitable time to visit to discuss our proposal in more detail. We hope that this reassures you our intention is to work with the local GA community, including any local airfields or airstrips, to explore the possibility of operations working alongside each other. We, like the CAA and as I'm sure you do, believe that being able to share the airspace is ultimately the best solution for all stakeholders and this is a step along that path. We have previously successfully demonstrated working in close proximity to microgliding and gliding clubs, and believe we could work with you and the broader GA community to achieve the same in this trial.

If you have any further questions or would like to schedule a meeting with either our healthcare or aviation team, please do not hesitate to contact us. We hope to see you at Athey Moor in the coming weeks.

Kind regards,

On Sun, 6 Aug 2023 at 11:12, [REDACTED] wrote:

Hello I am a microlight pilot out of [REDACTED] and wish to strongly object to your proposed airspace changes in Northumberland on the grounds of safety for me and my passengers.

I like hundreds of other GA pilots regurly fly south down the coast in the low level route under Newcastles airspace with the option of making an emergency landing on shore if needed and your proposals will block us all from using that route.

If your proposals go ahead we will be forced some 4 miles out to sea with no chance of gliding back to shore if there are any problems hence increasing the risk of ditching in the ice cold North Sea.

I hope you read this email and reconsider your proposal and talk with local GA pilots to find a better solution for all air users.

Yours faithfully

[REDACTED]
Sent from my Galaxy



[Airspace] Trial Plan Northumbria Stage 2 ACP-2023-015

6 August 2023 at 17:17

Dear sirs

I wish to lodge with you my concerns and objections to the proposed plan, which has just been forwarded to me.

Whilst I accept a need for and welcome the proposed initiative, my concerns and therefore objections are based solely on the limitations that this proposal will put on my flying hours and in some instances may put me and my aircraft in an unsafe situation.

I am a pilot flying out of [REDACTED] with an Eurostar microlight two seater aircraft. Both the coastal North South Route and return, avoiding the Newcastle ATC zone, the Consett-Derwent-Hexham route and the Tyne Valley route towards Carlisle identified in the proposal as a TDA are routes I regularly fly both ways and I believe many if not most other pilots in the region will use these routes to reach the West Coast and to fly down south. This equally applies to those pilots also wishing to route South to North, or West to East and impacting Scottish flyers also. Whilst it may be possible to request a transit one routing from Newcastle ATC, current experience and information suggests this is unlikely due to staffing shortages at the ATC. This therefore imposes additional limits to flight planning. Additionally, your proposed TDA also appears to significantly require pilots to fly, particularly in the Tyne Valley area at a minimum height of 1700 to 2000' - your 600 feet above minimum ground level applies. This may cause problems when GA pilots are met with increased and lowering cloud cover, often the case in the Tyne Valley.

I note the following in your plan and wish to comment as to those points your outline.

Page 2/24 : The feasibility flights will be conducted by UAS operator Zipline. Zipline designs, manufactures and operates the world's largest automated on-demand delivery system with a fleet of proprietary, fully-electric, and highly-automated UAS. More information about Zipline can be found in Annex B.

Annex B - page 11/24 states: By using an industry-leading Path Planner software, Zips fly routes that maximise safety and efficiency while minimising air and ground risk.

Perhaps someone can advise me who's safety and air risk is being maximised here and just as importantly, how is this being achieved? What thought has been given to the General Aviation aircraft being flown which is not carrying a transponder or any conspicuity device.?

4/24: Zipline intends to seek UK CAA guidance on compliantly deploying detect and avoid technology to remove the need for segregated airspace, in line with the Airspace Modernisation Strategy. The most appropriate way to implement such segregated airspace is in the form of a TDA.

Whilst this may seem to be the most appropriate way to you, you are effectively preventing GA flying in the North East for a substantial period of time.

This clearly impacts those persons who have spent a substantial amount of money to enjoy their hobby and I see no reason why you feel you can impact this enjoyment in this way. You have clearly not considered the needs of the GA sector in your proposals, except to say you wish to hear their views.. A more understanding approach to your problems and possible solutions would have been more acceptable.

Using the coastal route to fly South or North will now require an offshore transit which may put the pilot and passenger at risk in the event of inclement weather or mechanical failure on board the aircraft. I do not accept that this is a reasonable proposal.

You also comment that you will not be providing a Danger Area Crossing Service (Dacs) during this trial period. I object to this strongly. You appear to be making no attempt to provide a solution other than to effectively say the onus is on the pilot of the manned aircraft. This is to my mind unacceptable.

You comment that during this trial period, you aim to increase the number of deliveries - Page 1/24 & 3/24 & Need for the service will be 'On demand' 6/24 and this seems to go against your comments that the TDA's may be activated and advised through Notams 24 hours before the flight takes place. It suggests that it is possible there will be flights at any time of the day every day and it is therefore unlikely that we can be assured that Notams advising a No fly day for the drone will be available. How you can fly emergency deliveries, over and above normal scheduled deliveries without further impacting GA flying is beyond me.

I am also therefore interested in what proposal regarding airspace reconfiguration you can come up with - page 18/24

- and I assume this will take into account GA flying as well as commercial, military etc?

My immediate reaction to this proposal is that it will severely harm recreational flying in the North of England as it forms a barrier to any aircraft in the area, noting that in most cases, these aircraft are flying around the 3000 hight AMSL and are substantially affected by weather conditions particularly low cloud.

Unless the CAA can determine and recommend a device which will enable both detection and avoidance of a drone then I do not see how this can be consider safe.

It should not be for they GA flyer to make way for these trials but rather for the trials to take place knowing the risks that they present to GA pilots and therefore taking these into account. I do not see how this has been achieved and under the circumstances I am unable to provide any positive acceptance to the proposal.

Regards





Re: [Airspace] Trial Plan Northumbria Stage 2 ACP-2023-015

1 message

16 August 2023 at 10:08

Dear [REDACTED]

Thank you very much for responding with feedback on our proposal. We appreciate the time it has taken to read the material and the constructive feedback you have provided. We would be more than happy to meet and discuss this with you, but in the meantime, we have addressed your points below.

We have reached out to Athey Moor and Eshott directly and hope to agree a suitable time to visit to discuss our proposal in more detail. We hope that this reassures you our intention is to work with the local GA community, including any local airfields or airstrips, to explore the possibility of operations working alongside each other. We, like the CAA and as I'm sure you do, believe that being able to share the airspace is ultimately the best solution for all stakeholders and this is a step along that path. We have previously successfully demonstrated working in close proximity to microgliding and gliding clubs, and believe we could work with you and the broader GA community to achieve the same in this trial.

As previous air traffic controllers we have knowledge of and appreciate the restrictions you might face when flying, and getting a perspective from a pilot who flies in the local area is extremely important. Your feedback will help us continue the airspace change process by taking into consideration the feedback we have received to develop a more refined airspace.

Current regulations mean that we are required to apply for a TDA, however, we would like to emphasise that we do not see this as a long-term solution and are working in collaboration with the CAA to support the development of integrated airspace that allows equitable use for all airspace users. Our UAS operator intends to seek CAA guidance on compliantly deploying detect and avoid technology to remove the need for segregated airspace, in line with the Airspace Modernisation Strategy.

Given Zipline's has previously integrated safely with the GA communities in the United States, Japan and 5 countries in Africa, we are optimistic there may be other solutions to enable safe interoperability between our NHS trial and GA operations such as yours while the TDA is in effect.

We are currently in Stage 1 of the airspace change process, this allows us the opportunity to gain feedback from the wider aviation stakeholders on our proposal. It is not until this stakeholder engagement has been completed that we are able to have a complete view of operations in the area, as data linked to uncertified aerodromes and the GA community can be challenging to obtain. Following stakeholder engagement, we will review all the feedback and reevaluate our proposal. The stages for a trial airspace change can be found on the CAA Airspace Change Portal and details can be found in CAP1616. Our submission to the CAA for our proposal will be shared on the portal for stakeholders to view.

In addition to the airspace change process, the UAS operator must receive Operational Authorisation from the CAA prior to the commencement of flight operations. This application will not form part of the airspace change request but is linked to the specific airspace. The Operational Authorisation covers many of the safety aspects that are related to the UAS, procedures and operation itself.

Apian is being supported and guided by Newcastle International Airport ATC regarding operations in close proximity to Newcastle Airport. We will continue to re-evaluate the DACS and DAAIS requirements based on feedback from the aviation community and refinement of the airspace.

Activation of the TDA will be communicated via NOTAM with a minimum of 24hrs notice provided as per the NOTAM process. If we are not utilising the airspace, for example due to weather limitations or aircraft serviceability, we will request for the NOTAM to be deactivated in accordance with the flexible use of airspace principles. Contact details for the operations team will be included in the NOTAM. Emergency deliveries will not require an additional NOTAM. If you have suggestions to improve the safe sharing of this information, please let us know and we can discuss them with the CAA.

If you have any further questions or would like to schedule a meeting with either our healthcare or aviation team, please do not hesitate to contact us. We hope to see you at Athey Moor in the coming weeks.

Kind regards

On Sun, 6 Aug 2023 at 17:17 [REDACTED] wrote:

Dear sirs

I wish to lodge with you my concerns and objections to the proposed plan, which has just been forwarded to me.

Whilst I accept a need for and welcome the proposed initiative, my concerns and therefore objections are based solely on the limitations that this proposal will put on my flying hours and in some instances may put me and my aircraft in an unsafe situation.

I am a pilot flying out of Athey Moor with an Eurostar microlight two seater aircraft. Both the coastal North South Route and return, avoiding the Newcastle ATC zone, the Consett-Derwent-Hexham route and the Tyne Valley route towards Carlisle identified in the proposal as a TDA are routes I regularly fly both ways and I believe many if not most other pilots in the region will use these routes to reach the West Coast and to fly down south. This equally applies to those pilots also wishing to route South to North, or West to East and impacting Scottish flyers also. Whilst it may be possible to request a transit one routing from Newcastle ATC, current experience and information suggests this is unlikely due to staffing shortages at the ATC. This therefore imposes additional limits to flight planning.

Additionally, your proposed TDA also appears to significantly require pilots to fly, particularly in the Tyne Valley area at a minimum height of 1700 to 2000' - your 600 feet above minimum ground level applies. This may cause problems when GA pilots are met with increased and lowering cloud cover, often the case in the Tyne Valley.

I note the following in your plan and wish to comment as to those points your outline.

Page 2/24 : The feasibility flights will be conducted by UAS operator Zipline. Zipline designs, manufactures and operates the world's largest automated on-demand delivery system with a fleet of proprietary, fully-electric, and highly-automated UAS. More information about Zipline can be found in Annex B.

Annex B - page 11/24 states: By using an industry-leading Path Planner software, Zips fly routes that maximise safety and efficiency while minimising air and ground risk.

Perhaps someone can advise me who's safety and air risk is being maximised here and just as importantly, how is this being achieved? What thought has been given to the General Aviation aircraft being flown which is not carrying a transponder or any conspicuity device.?

4/24: Zipline intends to seek UK CAA guidance on compliantly deploying detect and avoid technology to remove the need for segregated airspace, in line with the Airspace Modernisation Strategy. The most appropriate way to implement such segregated airspace is in the form of a TDA.

Whilst this may seem to be the most appropriate way to you, you are effectively preventing GA flying in the North East for a substantial period of time.

This clearly impacts those persons who have spent a substantial amount of money to enjoy their hobby and I see no reason why you feel you can impact this enjoyment in this way. You have clearly not considered the needs of the GA sector in your proposals, except to say you wish to hear their views.. A more understanding approach to your problems and possible solutions would have been more acceptable.

Using the coastal route to fly South or North will now require an offshore transit which may put the pilot and passenger at risk in the event of inclement weather or mechanical failure on board the aircraft. I do not accept that this is a reasonable proposal.

You also comment that you will not be providing a Danger Area Crossing Service (Dacs) during this trial period. I object to this strongly. You appear to be making no attempt to provide a solution other than to effectively say the onus is on the pilot of the manned aircraft. This is to my mind unacceptable.

You comment that during this trial period, you aim to increase the number of deliveries - Page 1/24 & 3/24 & Need for the service will be 'On demand' 6/24 and this seems to go against your comments that the TDA's may be activated and advised through Notams 24 hours before the flight takes place. It suggests that it is possible there will be flights at any time of the day every day and it is therefore unlikely that we can be assured that Notams advising a No fly day for the drone will be available. How you can fly emergency deliveries, over and above normal

scheduled deliveries without further impacting GA flying is beyond me.

I am also therefore interested in what proposal regarding airspace reconfiguration you can come up with - page 18/24 - and I assume this will take into account GA flying as well as commercial, military etc?

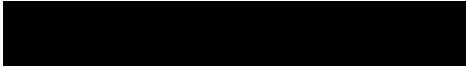
My immediate reaction to this proposal is that it will severely harm recreational flying in the North of England as it forms a barrier to any aircraft in the area, noting that in most cases, these aircraft are flying around the 3000 hight AMSL and are substantially affected by weather conditions particularly low cloud.

Unless the CAA can determine and recommend a device which will enable both detection and avoidance of a drone then I do not see how this can be consider safe.

It should not be for they GA flyer to make way for these trials but rather for the trials to take place knowing the risks that they present to GA pilots and therefore taking these into account. I do not see how this has been achieved and under the circumstances I am unable to provide any positive acceptance to the proposal.

Regards





[Airspace] Apian Northumbria NHS Air Grid Airspace change ID: ACP-2023-015



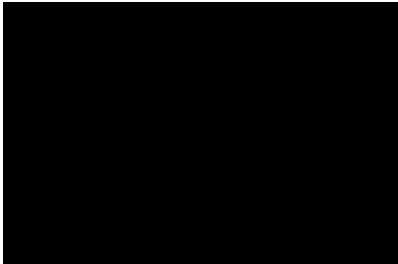
7 August 2023 at 05:44

Sirs,

I object to the ACP in the strongest terms as the TDA design completely fails to adhere to the CAA requirement to minimise impact on other air users. It closes two grass airstrips, blocks the busy East Coast VFR coastal transit route under the Newcastle CTA, creates choke points that will result in a large increase in traffic seeking Newcastle zone transits/Spadeadam D510 crossings and is unreasonable in its vertical planning, extending to around 1500ft AGL in the busy Tyne Valley transit route.

The extensive nature of this TDA will severely and negatively impact other air users in Northern England. I believe this trial only becomes viable when certified Detect and Avoid Technology is available enabling co-existence rather than implementation via a TDA. By progressing the TDA option, the wider flying community is being hugely restricted and put at significant risk which is totally unacceptable.

Regards,





Re: [Airspace] Apian Northumbria NHS Air Grid Airspace change ID: ACP-2023-015

1 message

11 August 2023 at 13:01

Dear [REDACTED]

Thank you very much for responding with feedback on our proposal. We appreciate the time it has taken to read the material and the constructive feedback you have provided. We would be more than happy to meet and discuss this with you, but in the meantime, we have addressed your points below.

As previous air traffic controllers we have knowledge of and appreciate the restrictions you might face when flying, and getting a perspective from a pilot who flies in the local area is extremely important. Your feedback will help us continue the airspace change process by considering the feedback we have received to develop a more refined airspace.

Our intention is to work with the local GA community, including any local airfields or airstrips, to explore the possibility of operations working alongside each other. We, like the CAA and as I'm sure you do, believe that being able to share the airspace is ultimately the best solution for all stakeholders and this is a step along that path. It is extremely challenging to gain data on the GA operations at uncertified aerodromes, and proves why stakeholder engagement is an important part of the process. We have previously successfully demonstrated working in close proximity to microgliding and gliding clubs, and believe we could work with you and the broader GA community to achieve the same in this trial.

Apian is being supported and guided by Newcastle International Airport ATC regarding operations in close proximity to Newcastle Airport. We will continue to re-evaluate the DACS and DAAIS requirements based on feedback from the aviation community and refinement of the airspace.

Apian was founded by two NHS doctors, and all of our work is focused on providing improved healthcare to our patients and clinicians. We are working directly with the Northumbria Healthcare NHS Foundation Trust, to provide an on-demand delivery service in the most rural NHS Trust in England. The airspace proposed is directly linked to the use case requirements which are outlined in Annex B.

Current regulations mean that we are required to apply for a TDA, however, we would like to emphasise that we do not see this as a long-term solution and are working in collaboration with the CAA to support the development of integrated airspace that allows equitable use for all airspace users. Our UAS operator intends to seek CAA guidance on compliantly deploying detect and avoid technology to remove the need for segregated airspace, in line with the Airspace Modernisation Strategy.

If you have any further questions or would like to schedule a meeting with either our healthcare or aviation team, please do not hesitate to contact us.

Kind regards

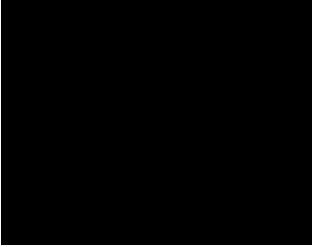
On Mon, 7 Aug 2023 at 05:44, [REDACTED] wrote:
Sirs,

I object to the ACP in the strongest terms as the TDA design completely fails to adhere to the CAA requirement to minimise impact on other air users. It closes two grass airstrips, blocks the busy East Coast VFR coastal transit route under the Newcastle CTA, creates choke points that will result in a large increase in traffic seeking Newcastle

zone transits/Spadeadam D510 crossings and is unreasonable in its vertical planning, extending to around 1500ft AGL in the busy Tyne Valley transit route.

The extensive nature of this TDA will severely and negatively impact other air users in Northern England. I believe this trial only becomes viable when certified Detect and Avoid Technology is available enabling co-existence rather than implementation via a TDA. By progressing the TDA option, the wider flying community is being hugely restricted and put at significant risk which is totally unacceptable.

Regards,





[Airspace] Request for details of Trial Plan Northumbria Stage 2 ACP-2023-015



7 August 2023 at 19:39

Dear

Thank you for the trial proposal document. This was indeed the very file by which I first became aware of the proposed trial and large danger area. I have read the document through again.

There are numerous issues that cause concern and are not covered in detail hence the request for a detailed risk assessment of the operation.

For example, there is an amount of information about peak noise but the risk of collision is brushed away with one sentence that manned (crewed) aviation is not affected up to 7000 feet. I suspect that a lack of understanding of aviation has led to writing 7000 feet when you meant 700 feet. If the figure is correct please would you explain the reason for requiring such an altitude?

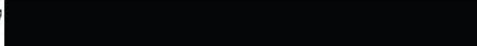
Aircraft need to take off and land. They would require going through the danger area for this. Surely there is a substantial risk to aircraft as they pass through the danger area.

I hope that by reading your risk assessment I can be assured of the suitability of the planned trial.

Many thanks.

Yours,



On 7 Aug 2023, at 12:57  wrote:

[Quoted text hidden]
<ACP-2023-015_Trial_Plan (1).pdf>



Re: [Airspace] Request for details of Trial Plan Northumbria Stage 2 ACP-2023-015

1 message

11 August 2023 at 13:08

Dear [REDACTED]

Thank you very much for responding with feedback on our proposal. We appreciate the time it has taken to read the material and the constructive feedback you have provided. We would be more than happy to meet and discuss this with you, but in the meantime, we have addressed your points below.

We are currently in Stage 1 of the airspace change process, this allows us the opportunity to gain feedback from the wider aviation stakeholders on our proposal. It is not until this stakeholder engagement has been completed that we are able to have a complete view of operations in the area, as data linked to uncertified aerodromes and the GA community can be challenging to obtain. Following stakeholder engagement, we will review all the feedback and reevaluate our proposal. The stages for a trial airspace change can be found on the [CAA Airspace Change Portal](#) and details can be found in [CAP1616](#). Our submission to the CAA for our proposal will be shared on the portal for stakeholders to view.

In addition to the airspace change process, the UAS operator must receive Operational Authorisation from the CAA prior to the commencement of flight operations. This application will not form part of the airspace change request but is linked to the specific airspace. The Operational Authorisation covers many of the safety aspects that are related to the UAS, procedures, and operation itself.

The 7000ft you mention is stated in reference to the environmental considerations we must make as part of the application. This trial will not impact the distribution of air traffic patterns into/out of Newcastle Aerodrome, and therefore will not alter any published arrival or departure routes. We are thankful for your feedback and will ensure the wording of this section is clear in future versions.

To ensure you get the latest news relating to the trial, including publications regarding our operations, we recommend you subscribe to updates on ACP-2023-015 through the Airspace Change Portal. We will also include you in our communications with stakeholders going forward.

Kind regards

On Mon, 7 Aug 2023 at 19:40, [REDACTED] wrote:

Dear [REDACTED]

Thank you for the trial proposal document. This was indeed the very file by which I first became aware of the proposed trial and large danger area. I have read the document through again.

There are numerous issues that cause concern and are not covered in detail hence the request for a detailed risk assessment of the operation.

For example, there is an amount of information about peak noise but the risk of collision is brushed away with one sentence that manned (crewed) aviation is not affected up to 7000 feet. I suspect that a lack of understanding of aviation has led to writing 7000 feet when you meant 700 feet. If the figure is correct please would you explain the reason for requiring such an altitude?

Aircraft need to take off and land. They would require going through the danger area for this. Surely there is a substantial risk to aircraft as they pass through the danger area.

I hope that by reading your risk assessment I can be assured of the suitability of the planned trial.

Many thanks,

Yours,

On 7 Aug 2023, at 12:57, [REDACTED] wrote:

Dear [REDACTED]

Thank you for your email.

Please find attached our Trial plan, which can also be found on the [CAA Airspace Change Portal ACP-2023-015](#).

As you will see on the link above. ACP-2023-015 is in Stage 1 of the Airspace Change Process. This means we are currently requesting feedback from stakeholders. Our stakeholder engagement is a valuable opportunity for us to gather knowledge and input directly from the aviators who fly within the area and know the Northumbria area best. We welcome any feedback specific to this ACP.

If you have any further questions or would like to schedule a meeting with either our healthcare or aviation team, please do not hesitate to contact us.

Kind regards

On Fri, 4 Aug 2023 at 18:41 [REDACTED] wrote:

Dear Sir/Madam,

I have just become aware of the proposed UAV flight trials and large Danger Area across Northumberland.

Please would you send me details of the Risk Assessment for this trial so that I can review it and comment if necessary.

Many thanks.

Yours

<ACP-2023-015_Trial_Plan (1).pdf>



[Airspace] Proposed Airspace Change - Northumbria TDA

8 August 2023 at 08:01

Sir,

I am writing to express my strong objection to the proposed alterations to the local airspace within the North-East of England, as detailed in the Public Proposal Area [pID: 546] on the CAA Airspace Change Portal. My concerns are deeply rooted in the potential adverse impact these changes may inflict upon the community of recreational pilots in our region.

The recent article "Severe and Negative Impact if Northumbria TDA Goes Ahead," published by Flyer Magazine, provides invaluable insights into the implications of these proposed airspace adjustments. The rationale behind the establishment of a danger area within the proposed changes warrants further scrutiny. Recreational aircraft operating under Visual Flight Rules (VFR) adhere to a "see and avoid" principle, while Instrument Flight Rules (IFR) aircraft maintain altitudes above Minimum Safe Altitudes (MSA), ensuring safe separation. Hence, the risk of a collision between an aircraft and a drone is no greater than that between two aircraft themselves.

It is disconcerting that the proposed changes exhibit a lack of comprehensive foresight. The arbitrary determination of the tops of the Terminal Control Area (TDA) based on mean sea level (MSL), rather than above ground level (AGL), raises significant concerns. The Flyer Magazine article aptly highlights the consequences of such a choice, particularly in relation to the crucial Hexham gap and east coast transit routes. These routes, already constrained by existing airspace and military danger areas, will face additional challenges due to these proposed modifications.

Furthermore, the wellbeing of our local general aviation community hangs in the balance. The Flyer Magazine article underscores the detrimental effects of the proposed changes, detailing the resultant operational difficulties. The ability to fly northwards, an essential aspect of recreational aviation, is compromised by the risk of inadvertently breaching the newly designated danger area. This restriction poses not only a practical challenge but also undermines the essence of recreational flying in our region.

I am compelled to bring attention to the fact that the impact of these proposed alterations extends beyond the boundaries of airfields encompassed within the TDA. The Flyer Magazine article draws attention to the broader implications on the general aviation ecosystem, encompassing businesses vital to the provision of services such as aircraft maintenance, flight training, and fuelling. The ramifications of the changes may well result in economic setbacks and a decline in overall aviation activities.

In conclusion, I respectfully urge you to re-evaluate the proposed changes to our local airspace with utmost consideration for the concerns raised by the Flyer Magazine article and the broader recreational aviation community. It is of paramount importance that a comprehensive consultation process ensues, engaging stakeholders from various sectors of aviation, including recreational pilots. By doing so, we can collaboratively develop a solution that ensures both safety and the preservation of the cherished recreational flying experiences that our community values.

Thank you for your time and attention to this matter.





Re: [Airspace] Proposed Airspace Change - Northumbria TDA

1 message

17 August 2023 at 15:06

Dear [REDACTED]

Thank you very much for responding with feedback on our proposal. We appreciate the time it has taken to read the material and the constructive feedback you have provided. We would be more than happy to meet and discuss this with you, but in the meantime, we have addressed your points below.

As previous air traffic controllers we have knowledge of and appreciate the restrictions you might face when flying, and getting a perspective from a pilot who flies in the local area is extremely important. Your feedback will help us continue the airspace change process by taking into consideration the feedback we have received to develop a more refined airspace.

Our intention is to work with the local GA community, including any local airfields or airstrips, to explore the possibility of operations working alongside each other. We, like the CAA and as I'm sure you do, believe that being able to share the airspace is ultimately the best solution for all stakeholders and this is a step along that path. We have previously successfully demonstrated working in close proximity to microgliding and gliding clubs, and believe we could work with you and the broader GA community to achieve the same in this trial.

We are currently in Stage 1 of the airspace change process, this allows us the opportunity to gain feedback from the wider aviation stakeholders on our proposal. It is not until this stakeholder engagement has been completed that we are able to have a complete view of operations in the area, as data linked to uncertified aerodromes and the GA community can be challenging to obtain. Following stakeholder engagement, we will review all the feedback and reevaluate our proposal. The stages for a trial airspace change can be found on the CAA Airspace Change Portal and details can be found in CAP1616.

Our proposal outlines the tops of the TDA must be represented in AMSL in accordance with ICAO Annex 11 2.30.2. Subject to approval, the UAS operator will be conducting operations below 600ft AGL, we will continue to evaluate the airspace requested for operations to ensure that the minimum airspace is being requested.

Current regulations mean that we are required to apply for a TDA, however, we would like to emphasise that we do not see this as a long-term solution and are working in collaboration with the CAA to support the development of integrated airspace that allows equitable use for all airspace users. Our UAS operator intends to seek CAA guidance on compliantly deploying detect and avoid technology to remove the need for segregated airspace, in line with the Airspace Modernisation Strategy.

If you have any further questions or would like to schedule a meeting with either our healthcare or aviation team, please do not hesitate to contact us.

Kind regards,

[REDACTED]

On Tue, 8 Aug 2023 at 08:01, [REDACTED] wrote:

Sir,

I am writing to express my strong objection to the proposed alterations to the local airspace within the North-East of England, as detailed in the Public Proposal Area [pID: 546] on the CAA Airspace Change Portal. My concerns are deeply rooted in the potential adverse impact these changes may inflict upon the community of recreational pilots in our region.

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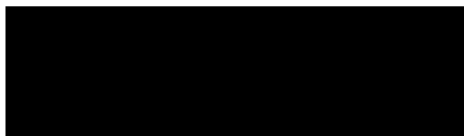
It is disconcerting that the proposed changes exhibit a lack of comprehensive foresight. The arbitrary determination of the tops of the Terminal Control Area (TDA) based on mean sea level (MSL), rather than above ground level (AGL), raises significant concerns. The Flyer Magazine article aptly highlights the consequences of such a choice, particularly in relation to the crucial Hexham gap and east coast transit routes. These routes, already constrained by existing airspace and military danger areas, will face additional challenges due to these proposed modifications.

Furthermore, the wellbeing of our local general aviation community hangs in the balance. The Flyer Magazine article underscores the detrimental effects of the proposed changes, detailing the resultant operational difficulties. The ability to fly northwards, an essential aspect of recreational aviation, is compromised by the risk of inadvertently breaching the newly designated danger area. This restriction poses not only a practical challenge but also undermines the essence of recreational flying in our region.

I am compelled to bring attention to the fact that the impact of these proposed alterations extends beyond the boundaries of airfields encompassed within the TDA. The Flyer Magazine article draws attention to the broader implications on the general aviation ecosystem, encompassing businesses vital to the provision of services such as aircraft maintenance, flight training, and fuelling. The ramifications of the changes may well result in economic setbacks and a decline in overall aviation activities.

In conclusion, I respectfully urge you to re-evaluate the proposed changes to our local airspace with utmost consideration for the concerns raised by the Flyer Magazine article and the broader recreational aviation community. It is of paramount importance that a comprehensive consultation process ensues, engaging stakeholders from various sectors of aviation, including recreational pilots. By doing so, we can collaboratively develop a solution that ensures both safety and the preservation of the cherished recreational flying experiences that our community values.

Thank you for your time and attention to this matter.





[Airspace] re ACP-2023-15



9 August 2023 at 08:30

Dear Sir / Madam

Figure B.3 in the Trial plan document omits the area of airspace currently utilised by Northumbria Gliding club as agreed with Newcastle airport.

Would you be able to forward me a revised copy of this figure with the gliding club airspace indicated on the figure?

Yours faithfully





Re: [Airspace] re ACP-2023-15

1 message

11 August 2023 at 13:12

Dear 

Thank you for your email.

Could you please confirm that the chart in section 1.6 of LOA reference EGNTATC-LOA-008 is the area of airspace used by Northumbria Gliding Club in agreement with Newcastle International Airport to which you are referring?

If so, our proposal is outside controlled airspace around this area and would not impact your local agreements with Newcastle. We would be unable to add this to the chart for publication as this is a local agreement and not listed on published aeronautical charts.

However, if this is not the agreement you are referring to, please could you clarify and provide details of the airspace you are referring to, that would be greatly appreciated.

Kind regards,

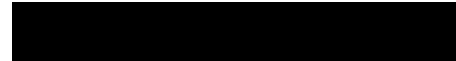

On Wed, 9 Aug 2023 at 08:30  wrote:

Dear Sir / Madam

Figure B.3 in the Trial plan document omits the area of airspace currently utilised by Northumbria Gliding club as agreed with Newcastle airport.

Would you be able to forward me a revised copy of this figure with the gliding club airspace indicated on the figure?

Yours faithfully

[Airspace] Apian Northumbria NHS Air Grid Airspace change ID: ACP-2023-015

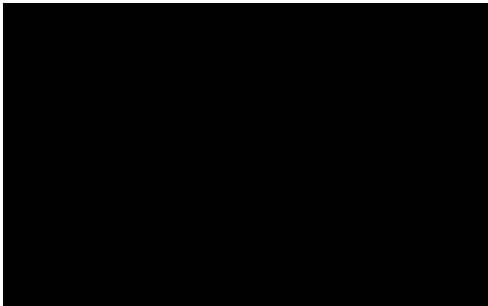
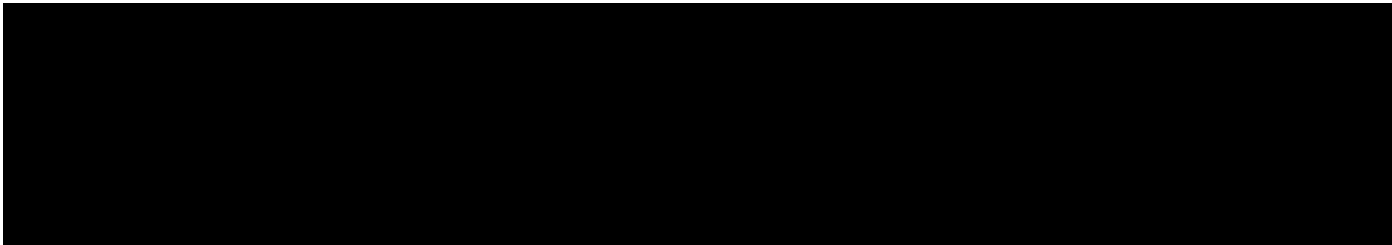


9 August 2023 at 13:12

Good afternoon

I have just seen & read your proposals re the above change of Airspace.
I am an approved CAA UAV (7yrs) operator based in Hexham and operating throughout Northumberland mainly doing mapping operations.
These changes will impact my business as some of the area proposed covers areas I fly and sites I use for training/testing.
There is also a local model flying club which has its flying field near Hexham.
What input/say do I have in all this?

Regards





Re: [Airspace] Apian Northumbria NHS Air Grid Airspace change ID: ACP-2023-015

1 message

15 August 2023 at 20:10

Dear [REDACTED],

Thank you so much for your email.

We want to assure you that if our proposal is approved, we have no intention to restrict your activities and would like to work collaboratively with you to ensure we have a suitable safe solution in place that works for all. We have experience of working with other aviation operators, including local UA VLOS operators, to allow safe integration within the same airspace in previous trials.

We are currently in Stage 1 of the airspace change process, this allows us the opportunity to gain feedback from the wider aviation stakeholders on our proposal. It is not until this stakeholder engagement has been completed that we are able to have a complete view of operations in the area. Following stakeholder engagement, we will review all the feedback and reevaluate our proposal. The stages for a trial airspace change can be found on the [CAA Airspace Change Portal](#) and details can be found in [CAP1616](#).

It would be extremely helpful if you could let me know when a convenient time is to call you to discuss your operations in more detail. This will allow us to review and determine if a Letter of Agreement is required.

We look forward to hearing from you,

Kind regards,

On Wed, 9 Aug 2023 at 13:13, [REDACTED] wrote:

Good afternoon

I have just seen & read your proposals re the above change of Airspace.

I am an approved CAA UAV (7yrs) operator based in Hexham and operating throughout Northumberland mainly doing mapping operations.

These changes will impact my business as some of the area proposed covers areas I fly and sites I use for training/testing.

There is also a local model flying club which has its flying field near Hexham.

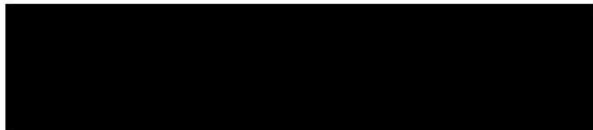
What input/say do I have in all this?

Regards



[Airspace] ACP-2023-015 - Feedback

1 message



10 August 2023 at 15:41

Name	
Email	
Representing	
Address	

I am writing to provide my response to the public consultation on the proposed changes specifically related to the establishment of Temporary Danger Areas (TDAs) as outlined in the documentation.

As a private pilot based at Fishburn Airfield, I am deeply concerned about the potential impacts of the proposed changes, and I object to the current design of the TDA and plans for its activation and management. I believe the proposals are in direct conflict with the requirements set forth by the Civil Aviation Authority (CAA) including policy as outlined in CAP 722.

The proposed TDA falls significantly short of adhering to the fundamental CAA requirement to minimize impacts on other air users. The TDA design and significant dimensions effectively closes two popular grass airstrips and obstructs the heavily utilized East Coast Visual Flight Rules (VFR) coastal transit route beneath the Newcastle Control Zone (CTA). Moreover, the design creates bottleneck situations, which are likely to result in an unwarranted surge in traffic seeking transits through the Newcastle zone and the Spadeadam D510 crossing.

The vertical planning of the TDA, extending to approximately 1500ft Above Ground Level (AGL) along the bustling Tyne Valley transit route, is both unreasonable and disruptive to the existing flight patterns.

The proposed implementation of Area B (SFC-1300ft) effectively obstructs the well-frequented East coastline transit route, forcing VFR General Aviation (GA) traffic to seek formal zone transits through the Newcastle Air Traffic Control (ATC). This proposed change is particularly concerning given the current understaffed state of Newcastle ATC, coupled with its reduced operational hours. This alteration will compel East coast traffic to either follow formal procedures, posing an extra burden on the already stretched resources, or divert up to 4 nautical miles out to sea. Such changes significantly elevate the risk for air users.

The proposed changes, specifically within Area C, would lead to the closure of the longstanding Hexham and Stanton airstrips for the duration of the "trial". These airstrips have been integral to the operations of various Light Aircraft Association (LAA), British Microlight Aircraft Association (BMAA), and historic aircraft for numerous years. The somewhat indelicate approach in designing the TDA, by employing a standing base of 600ft AGL above the tallest known feature, results in a TDA base height of 1750ft Above Mean Sea Level (AMSL) in Area C and 2000ft AMSL in Area D. This higher-than-necessary base altitude constrains a substantial portion of the TDA to altitudes of 1000ft-1500ft AGL, as opposed to the intended 600ft AGL. This severely curtails the feasibility of coast-to-coast General Aviation access through the Tyne Valley, a primary route for both civilian and military traffic in the North, especially when cloud bases are low.

The suggestion that a Danger Area Crossing Service (DACS) will not be provided due to the proposed TDA heights by Apian is deeply concerning and demonstrates an apparently poor understanding of impact to the GA community. Further, it appears to be entirely financially driven. A DACS could facilitate the operation of Stanton and Hexham airstrips while simultaneously ensuring the smooth flow of the busy Coastal and Tyne Valley VFR transit routes and is reasonable given the managed routing of the UAS. The current stance taken by Apian disregards the possibility of resolving this matter, and their assertion that a DACS is not viable appears disingenuous and misleading.

It was observed, during previous Unmanned Aircraft Systems (UAS) operations on the Northumberland Coast, that there were instances where TDA activation was not rescinded by fresh Notices to Airmen (NOTAMs) when operations were suspended due to weather conditions or serviceability issues. This resulted in airspace blockages that lasted for days, despite the lack of usage. It is imperative that Apian takes the initiative to release airspace as soon as operational suspensions are confirmed. To ensure transparency, I strongly advocate for the publication of airspace usage statistics, encompassing days and hours flown versus days and hours NOTAM'd. This data should be made available both to the General Aviation community and the regulatory authority.

The proposed TDAs, as they stand, have the potential to exert substantial negative impacts on air users across Northern England for little operational benefit that cannot be attained by more effectively controlled UAS operations. I firmly believe that the viability of this trial hinges on the availability of certified Detect and Avoid Technology, which would allow for coexistence rather than the imposition of a TDA. By pursuing the current TDA option, the broader flying community is confronted with severe restrictions and heightened risks, which is an unacceptable outcome.

In conclusion, I express my strong objection to the current proposal and urge a reconsideration of the TDA design in line with the CAA's stipulations regarding minimizing impacts on air users. I kindly request that my concerns and suggestions be taken into account during the decision-making process.



Re: [Airspace] ACP-2023-015 - Feedback

1 message

15 August 2023 at 20:32

Dear [REDACTED]

Thank you very much for responding with feedback on our proposal. We appreciate the time it has taken to read the material and the constructive feedback you have provided. We would be more than happy to meet and discuss this with you, but in the meantime, we have addressed your points below.

As previous air traffic controllers we have knowledge of and appreciate the restrictions you might face when flying, and getting a perspective from a pilot who flies in the local area is extremely important. Your feedback will help us continue the airspace change process by taking into consideration the feedback we have received to develop a more refined airspace.

Our intention is to work with the local GA community, including any local airfields or airstrips, to explore the possibility of operations working alongside each other. We, like the CAA and as I'm sure you do, believe that being able to share the airspace is ultimately the best solution for all stakeholders and this is a step along that path. We have previously successfully demonstrated working in close proximity to microgliding and gliding clubs, and believe we could work with you and the broader GA community to achieve the same in this trial.

Our proposal outlines the tops of the TDA must be represented in AMSL as accordance with ICAO Annex 11 2.30.2. Subject to approval, the UAS operator will be conducting operations below 600ft AGL, we will continue to evaluate the airspace requested for operations to ensure that the minimum airspace is being requested.

Your feedback regarding the DACS and DAAIS is also extremely helpful and we will continue to re-evaluate this requirement based on feedback from the aviation community and refinement of the proposed airspace.

Regarding NOTAMs in our previous trial, these were cancelled by the UAS operator directly when we did not anticipate flying. As per the NOTAM process, these were cancelled through the Airspace Regulation (Utilisation) Operations team at the CAA, who communicate them to the aviation industry. Cancellations of usage for the TDA were due to daily limitations (i.e. weather), which is why cancellations were not seen in advance as we utilised the TDA to complete as many deliveries, and capture as much data for the NHS as possible. Thank you for your suggestion of sharing more detailed utilisation, this is shared with the regulator on completion of the project. We will consider how best to share this with the GA and wider aviation community.

Current regulations mean that we are required to apply for a TDA, however, we would like to emphasise that we do not see this as a long-term solution and are working in collaboration with the CAA to support the development of integrated airspace that allows equitable use for all airspace users. Our UAS operator intends to seek CAA guidance on compliantly deploying detect and avoid technology to remove the need for segregated airspace, in line with the Airspace Modernisation Strategy.

We would like to thank you once again for your feedback, and confirm that this will be reviewed by our aviation team, and shared with the CAA as part of our submission.

If you have any further questions or would like to schedule a meeting with either our healthcare or aviation team, please do not hesitate to contact us.

Kind regards,



On Thu, 10 Aug 2023 at 15:41, [Redacted] wrote:

Name	[Redacted]
Email	[Redacted]
Representing	[Redacted]
Address	[Redacted]

I am writing to provide my response to the public consultation on the proposed changes specifically related to the establishment of Temporary Danger Areas (TDAs) as outlined in the documentation.

As a private pilot based at Fishburn Airfield, I am deeply concerned about the potential impacts of the proposed changes, and I object to the current design of the TDA and plans for its activation and management. I believe the proposals are in direct conflict with the requirements set forth by the Civil Aviation Authority (CAA) including policy as outlined in CAP 722.

The proposed TDA falls significantly short of adhering to the fundamental CAA requirement to minimize impacts on other air users. The TDA design and significant dimensions effectively closes two popular grass airstrips and obstructs the heavily utilized East Coast Visual Flight Rules (VFR) coastal transit route beneath the Newcastle Control Zone (CTA). Moreover, the design creates bottleneck situations, which are likely to result in an unwarranted surge in traffic seeking transits through the Newcastle zone and the Spadeadam D510 crossing.

The vertical planning of the TDA, extending to approximately 1500ft Above Ground Level (AGL) along the bustling Tyne Valley transit route, is both unreasonable and disruptive to the existing flight patterns.

The proposed implementation of Area B (SFC-1300ft) effectively obstructs the well-frequented East coastline transit route, forcing VFR General Aviation (GA) traffic to seek formal zone transits through the Newcastle Air Traffic Control (ATC). This proposed change is particularly concerning given the current understaffed state of Newcastle ATC, coupled with its reduced operational hours. This alteration will compel East coast traffic to either follow formal procedures, posing an extra burden on the already stretched resources, or divert up to 4 nautical miles out to sea. Such changes significantly elevate the risk for air users.

The proposed changes, specifically within Area C, would lead to the closure of the longstanding Hexham and Stanton airstrips for the duration of the "trial". These airstrips have been integral to the operations of various Light Aircraft Association (LAA), British Microlight Aircraft Association (BMAA), and historic aircraft for numerous years. The somewhat indelicate approach in designing the TDA, by employing a standing base of 600ft AGL above the tallest known feature, results in a TDA base height of 1750ft Above Mean Sea Level (AMSL) in Area C and 2000ft AMSL in Area D. This higher-than-necessary base altitude constrains a substantial portion of the TDA to altitudes of 1000ft-1500ft AGL, as opposed to the intended 600ft AGL. This severely curtails the feasibility of coast-to-coast General Aviation access through the Tyne Valley, a primary route for both civilian and military traffic in the North, especially when cloud bases are low.

The suggestion that a Danger Area Crossing Service (DACS) will not be provided due to the proposed TDA heights by Apian is deeply concerning and demonstrates an apparently poor understanding of impact to the GA community. Further, it appears to be entirely financially driven. A DACS could facilitate

the operation of Stanton and Hexham airstrips while simultaneously ensuring the smooth flow of the busy Coastal and Tyne Valley VFR transit routes and is reasonable given the managed routing of the UAS. The current stance taken by Apian disregards the possibility of resolving this matter, and their assertion that a DACS is not viable appears disingenuous and misleading.

It was observed, during previous Unmanned Aircraft Systems (UAS) operations on the Northumberland Coast, that there were instances where TDA activation was not rescinded by fresh Notices to Airmen (NOTAMs) when operations were suspended due to weather conditions or serviceability issues. This resulted in airspace blockages that lasted for days, despite the lack of usage. It is imperative that Apian takes the initiative to release airspace as soon as operational suspensions are confirmed. To ensure transparency, I strongly advocate for the publication of airspace usage statistics, encompassing days and hours flown versus days and hours NOTAM'd. This data should be made available both to the General Aviation community and the regulatory authority.

The proposed TDAs, as they stand, have the potential to exert substantial negative impacts on air users across Northern England for little operational benefit that cannot be attained by more effectively controlled UAS operations. I firmly believe that the viability of this trial hinges on the availability of certified Detect and Avoid Technology, which would allow for coexistence rather than the imposition of a TDA. By pursuing the current TDA option, the broader flying community is confronted with severe restrictions and heightened risks, which is an unacceptable outcome.

In conclusion, I express my strong objection to the current proposal and urge a reconsideration of the TDA design in line with the CAA's stipulations regarding minimizing impacts on air users. I kindly request that my concerns and suggestions be taken into account during the decision-making process.



[Airspace] ACP-2023-015

1 message



10 August 2023 at 16:06

Dear Sir or Madam,

Thank you for sight of the above proposed airspace change in support of your medical trial. I write as both a glider pilot with Northumbria Gliding Club and a relatively inexperienced powered pilot. I have significant difficulty with this proposed change on the following grounds:

- a. Northumbria Gliding Club is already heavily constrained by both Newcastle Airport airspace and the existence of Danger Areas D512A, D512B and D510B. A new Danger Area of the dimensions you propose would effectively block access to the North and North East since a glider pilot must always consider the need to "land out" and a DA from SFC to 1500ft MSL means it would very risky to take that route.
- b. The Pennines topography to the West of Northumbria Gliding Club often precludes a direct route to the Carlisle and Lakes areas - indeed on a powered VFR training flight only 2 days ago I had to use a route via the Tyne Valley. As I am sure you are aware, this is quite a busy route constrained by both the Pennines and D510B so your proposal would complicate planning and, potentially, close off a key route back to Northumbria Gliding Club in deteriorating weather.
- c. At 1500ft AMSL, the proposal is unreasonable in its vertical planning and the impact on other airspace users. Indeed, I am not convinced of the need for a declared danger area at all. We normally operate on the see and avoid principle and the chances of conflict at the heights you operate are very small. By all means NOTAM your activity when you are flying so that other users are aware, but please avoid a TDA in that area which will most definitely impact on other airspace users.

Once again, thank you for sharing your proposals.

Yours faithfully,

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Re: [Airspace] ACP-2023-015

1 message

15 August 2023 at 20:36

Dear [REDACTED]

Thank you very much for responding with feedback on our proposal. We appreciate the time it has taken to read the material and the constructive feedback you have provided.

As previous air traffic controllers we have knowledge of and appreciate the restrictions you might face when flying, and getting a perspective from a pilot who flies in the local area is extremely important. Your feedback will help us continue the airspace change process by taking into consideration the feedback we have received to develop a more refined airspace.

Current regulations mean that we are required to apply for a TDA, however, we would like to emphasise that we do not see this as a long-term solution and are working in collaboration with the CAA to support the development of integrated airspace that allows equitable use for all airspace users. Our UAS operator intends to seek CAA guidance on compliantly deploying detect and avoid technology to remove the need for segregated airspace, in line with the Airspace Modernisation Strategy.

If you have any further questions or would like to schedule a meeting with either our healthcare or aviation team, please do not hesitate to contact us.

On Thu, 10 Aug 2023 at 16:06 [REDACTED] wrote:

Dear Sir or Madam,

Thank you for sight of the above proposed airspace change in support of your medical trial. I write as both a glider pilot with Northumbria Gliding Club and a relatively inexperienced powered pilot. I have significant difficulty with this proposed change on the following grounds:

- a. Northumbria Gliding Club is already heavily constrained by both Newcastle Airport airspace and the existence of Danger Areas D512A, D512B and D510B. A new Danger Area of the dimensions you propose would effectively block access to the North and North East since a glider pilot must always consider the need to "land out" and a DA from SFC to 1500ft MSL means it would very risky to take that route.
- b. The Pennines topography to the West of Northumbria Gliding Club often precludes a direct route to the Carlisle and Lakes areas - indeed on a powered VFR training flight only 2 days ago I had to use a route via the Tyne Valley. As I am sure you are aware, this is quite a busy route constrained by both the Pennines and D510B so your proposal would complicate planning and, potentially, close off a key route back to Northumbria Gliding Club in deteriorating weather.
- c. At 1500ft AMSL, the proposal is unreasonable in its vertical planning and the impact on other airspace users. Indeed, I am not convinced of the need for a declared danger area at all. We normally operate on the see and avoid principle and the chances of conflict at the heights you operate are very small. By all means NOTAM your activity when you are flying so that other users are aware, but please avoid a TDA in that area which will most definitely impact on other airspace users.

Once again, thank you for sharing your proposals.

Yours faithfully,

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[Airspace] ACP-2023-015 Feedback

1 message

11 August 2023 at 02:03

I am writing to express my concerns to the proposed ACP-2023-015 Temporary Danger Area.

The proposal causes a number of business viability and safety concerns that cannot be ignored.

Firstly, The proposed Temporary Danger Area (TDA) is directly over the top of two local airfields, Stanton and Hexham Farm. The proposed danger area effectively closes these sites down for the duration of the TDA. There are also several helicopter landing sites in this area that would become unusable.

The TDA is also in close proximity to the Currock Hill gliding site, from which I am a flying instructor. The site is already extremely limited by the Class D airspace operated by Newcastle Airport and makes airspace to the NORTH and EAST of our airfield a no-go for gliders. This means that we are limited to operating gliders to the WEST and SOUTH. Given that gliders are unable to maintain height, the proposed TDA to the WEST of Currock Hill effectively creates yet another no-go area, which will be extremely limiting and unsafe in many wind directions. The TDA also cuts off access to safe landable fields in the Tyne Valley, an area I have personally landed gliders in on several occasions, particularly due to the difficult nature of the terrain to the south. The TDA additionally cuts off several nationally recognised turning points for gliders at Hexham, Haydon Bridge, Haltwhistle and Allendale, these points are used by gliders flying from sites across the country. The TDA will also prevent absolutely any access by gliders to North Northumberland both locally from Currock Hill and from other gliding sites elsewhere. Flying a glider from Currock Hill to Milfield, near Wooler which is a historically popular route between the two sites would become impossible. Due to all of the limitations created by the TDA, it is my belief that gliding around Currock Hill will become so difficult that many will simply go elsewhere, severely damaging the financial viability of the site which has been established since 1962.

The proposed TDA to the WEST of Currock hill is also in a busy VFR and Military transit area North/South between the Spadeadam Danger area and the Newcastle controlled airspace. This traffic currently mainly passes at low level which often means that the possibility of conflict between locally operated gliders from Currock Hill and transiting VFR/Military traffic is minimised. The TDA will push this already substantial amount of existing traffic higher and directly in the path of gliders. Since most gliders lack the electrical capacity to operate Transponders, this also means that gliders rarely show up on traffic awareness systems commonly fitted to GA and Military aircraft. This is a significant safety risk, especially given that most of this traffic is already avoiding Newcastle's airspace and therefore unlikely to be in contact with Newcastle ATC to provide traffic information.

The proposed TDA is also unreasonably high in many areas. In the North East where cloud bases can commonly be below 3-4000ft AMSL, the fact that the TDA can go as high as 2300ft AMSL, means that on these days, VFR traffic is further squeezed into an even tighter height band, further increasing the possibility of a midair collision. It should also be noted that given the almost joining up with the Spadeadam Danger area, the proposed TDA offers absolutely no alternative low level land routes, the only alternative being over water several miles off the East Coast, which in itself can be inherently unsafe for single engined aircraft.

Overall, I think that the proposed TDA is extremely poorly thought out. Without even considering the TDA to the North and East of the Newcastle controlled zone. There are simply far too many negative safety implications for existing manned aircraft in the area. Closing down two local airfields, severely damaging a local gliding site and overall creating unnecessary and unreasonable safety and navigational difficulties. This proposal is quite simply dangerous and without any overwhelming benefit.

I'm also aware that the flying schools at both Atheys Moor and Eshott have also expressed concern at whether it would be appropriate to allow their students to fly their solo cross country navigation routes in the area of this TDA given its safety and navigational difficulties in an already complex area of airspace, particularly when cloud bases are low, but otherwise perfectly safe to fly in without the proposed TDA in place. Further damaging local aviation businesses, potentially irrecoverably.

Overall, unless the activities proposed by Apian can be carried out in unsegregated airspace, I am unable to support any drone activity in this area if it requires a TDA or any other type of segregated airspace.



Re: [Airspace] ACP-2023-015 Feedback

1 message

17 August 2023 at 15:12

Dear [REDACTED]

Thank you very much for responding with feedback to our proposal. We appreciate the time it has taken to read the material and the constructive feedback you have provided. We would be more than happy to meet and discuss this with you, but in the meantime, we have addressed your points below.

As previous air traffic controllers we have knowledge of and appreciate the restrictions you might face when flying, and getting a perspective from a pilot who flies in the local area is extremely important. Your feedback will help us continue the airspace change process by taking into consideration the feedback we have received to develop a more refined airspace.

We have reached out to Athey Moor and Eshott directly and hope to agree a suitable time to visit to discuss our proposal in more detail with them. We hope this assures you that our intention is to work with the local GA community, including any local airfields or airstrips, to explore the possibility of operations working alongside each other. We, like the CAA and as I'm sure you do, believe that being able to share the airspace is ultimately the best solution for all stakeholders and this is a step along that path. We have previously successfully demonstrated working in close proximity to microgliding and gliding clubs, and believe we could work with you and the broader GA community to achieve the same in this trial.

Are you able to share more details of the helicopter landing sites that you are referring to? This would be extremely helpful in helping us to create a complete view of operations in the area, as data linked to uncertified aerodromes and the GA community can be challenging to obtain.

Apian was founded by two NHS doctors, and all of our work is focused on providing improved healthcare to our patients and clinicians. We are working directly with the Northumbria Healthcare NHS Foundation Trust, to provide an on-demand delivery service in the most rural NHS Trust in England. The airspace proposed is directly linked to the use case requirements which are outlined in Annex B.

Current regulations mean that we are required to apply for a TDA, however, we would like to emphasise that we do not see this as a long-term solution and are working in collaboration with the CAA to support the development of integrated airspace that allows equitable use for all airspace users. Our UAS operator intends to seek CAA guidance on compliantly deploying detect and avoid technology to remove the need for segregated airspace, in line with the Airspace Modernisation Strategy.

If you have any further questions or would like to schedule a meeting with either our healthcare or aviation team, please do not hesitate to contact us.

On Fri, 11 Aug 2023 at 02:03 [REDACTED] wrote:

I am writing to express my concerns to the proposed ACP-2023-015 Temporary Danger Area.

The proposal causes a number of business viability and safety concerns that cannot be ignored.

Firstly. The proposed Temporary Danger Area (TDA) is directly over the top of two local airfields, Stanton and Hexham Farm. The proposed danger area effectively closes these sites down for the duration of the TDA. There are also several helicopter landing sites in this area that would become unusable.

The TDA is also in close proximity to the Currock Hill gliding site, from which I am a flying instructor. The site is already extremely limited by the Class D airspace operated by Newcastle Airport and makes airspace to the NORTH and EAST of our airfield a no-go for gliders. This means that we are limited to operating gliders to the WEST and SOUTH. Given that gliders are unable to maintain height, the proposed TDA to the WEST of Currock Hill effectively creates yet another no-go area, which will be extremely limiting and unsafe in many wind directions. The TDA also cuts off access to safe landable fields in the Tyne Valley, an area I have personally landed gliders in on several occasions, particularly due to the difficult nature of the terrain to the south. The TDA additionally cuts off several nationally recognised turning points for gliders at Hexham, Haydon Bridge, Haltwhistle and Allendale, these points are used by gliders flying from sites across the country. The TDA will also prevent absolutely any access by gliders to North Northumberland both locally from Currock Hill and from other gliding sites elsewhere. Flying a glider from Currock Hill to Milfield, near Wooler which is a historically popular route between the two sites would become impossible. Due to all of the limitations created by the TDA, it is my belief that gliding around Currock Hill will become so difficult that many will simply go elsewhere, severely damaging the financial viability of the site which has been established since 1962.

The proposed TDA to the WEST of Currock hill is also in a busy VFR and Military transit area North/South between the Spadeadam Danger area and the Newcastle controlled airspace. This traffic currently mainly passes at low level which is often means that the possibility of conflict between locally operated gliders from Currock Hill and transiting VFR/Military traffic is minimised. The TDA will push this already substantial amount of existing traffic higher and directly in the path of gliders. Since most gliders lack the electrical capacity to operate Transponders, this also means that gliders rarely show up on traffic awareness systems commonly fitted to GA and Military aircraft. This is a significant safety risk, especially given that most of this traffic is already avoiding Newcastle's airspace and therefore unlikely to be in contact with Newcastle ATC to provide traffic information.

The proposed TDA is also unreasonably high in many areas. In the North East where cloud bases can commonly be below 3-4000ft AMSL, the fact that the TDA can go as high as 2300ft AMSL, means that on these days, VFR traffic is further squeezed into an even tighter height band, further increasing the possibility of a midair collision. It should also be noted that given the almost joining up with the Spadeadam Danger area, the proposed TDA offers absolutely no alternative low level land routes, the only alternative being over water several miles off the East Coast, which in itself can be inherently unsafe for single engined aircraft.

Overall, I think that the proposed TDA is extremely poorly thought out. Without even considering the TDA to the North and East of the Newcastle controlled zone. There are simply far too many negative safety implications for existing manned aircraft in the area. Closing down two local airfields, severely damaging a local gliding site and overall creating unnecessary and unreasonable safety and navigational difficulties. This proposal is quite simply dangerous and without any overwhelming benefit.

I'm also aware that the flying schools at both Atheys Moor and Eshott have also expressed concern at whether it would be appropriate to allow their students to fly their solo cross country navigation routes in the area of this TDA given its safety and navigational difficulties in an already complex area of airspace, particularly when cloud bases are low, but otherwise perfectly safe to fly in without the proposed TDA in place. Further damaging local aviation businesses, potentially irrecoverably.

Overall, unless the activities proposed by Apian can be carried out in unsegregated airspace, I am unable to support any drone activity in this area if it requires a TDA or any other type of segregated airspace.



Dear Stakeholder,

Request for support to [ACP-2023-015](#) Northumbria Healthcare NHS Foundation Trust feasibility flights within a trial Temporary Danger Area (TDA).

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

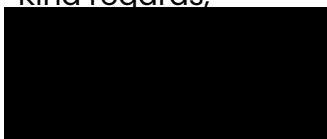
Apian, in conjunction with the Northumbria Healthcare NHS Foundation Trust, is looking to conduct feasibility flights using UAS between hospitals, GP surgeries, care homes and pharmacies. We would like to trial a regular, on demand delivery service for the distribution of medical payloads such as, prescription medication, medical implants, medical electronics, blood packs, medical and consumable supplies, medical documentation, as well as emergency deliveries. These flights will allow us to research, validate and provide vital data to establish whether the use of UAS, in these clinical settings will lead to improved patient care.

You may have supported us on our previous project in Northumbria ([ACP 2022 031](#)), and we would like to thank you for the support and feedback you provided during and after the [project](#). That feedback allowed us to gain an understanding of how we can better integrate UAS. Please see the summary and lessons learnt during that project [here](#).

As part of our application for a trial TDA, we have identified you as a key stakeholder. We have attached our trial plan for our proposal which includes details of our trial TDA in Annex C. We have also included a feedback form which we kindly request you return to us before the end of our stakeholder engagement period, 22nd September 2023, and look forward to receiving your confirmation of support.

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

Kind regards,



How to provide feedback

Apian welcomes comments and feedback from all interested parties. All comments received regarding this proposal will be taken into consideration before a final design is submitted to the CAA. All the details of this airspace change proposal are available on the [CAA's Airspace Change Portal](#). Feedback on the proposed trial TDA, or requests for further information should be sent to:

Aviation team at [REDACTED]

A feedback form is provided and a word document is attached to the email containing this material for your use if you wish.

Responses regarding the proposed trial TDA submission must be received by 22nd September 2023.

Name	[REDACTED]	
Email	[REDACTED]	
Representing	[REDACTED]	
Address (including postcode if possible)	[REDACTED]	
Feedback:		



Re: [Airspace] ACP-2023-015

1 message

22 August 2023 at 13:10

Dear [REDACTED]

Thank you very much for responding with feedback to our proposal. We appreciate the time it has taken to read the material and the constructive feedback you have provided. We would be more than happy to meet and discuss this with you, but in the meantime, we have addressed your points below.

As previous air traffic controllers we have knowledge of and appreciate the restrictions you might face when flying, and getting a perspective from a pilot who flies in the local area is extremely important. Your feedback will help us continue the airspace change process by taking into consideration the feedback we have received to develop a more refined airspace.

Our intention is to work with the local GA community, including any local airfields or airstrips, to explore the possibility of operations working alongside each other. We, like the CAA and as I'm sure you do, believe that being able to share the airspace is ultimately the best solution for all stakeholders and this is a step along that path. It is extremely challenging to gain data on the GA operations at uncertified aerodromes, and proves why stakeholder engagement is an important part of the process. We have previously successfully demonstrated working in close proximity to microgliding and gliding clubs, and believe we could work with you and the broader GA community to achieve the same in this trial.

Current regulations do not mandate the requirement for an ADS-B/Transponder and therefore would not provide suitable safety mitigations for removal of the requirement for segregated airspace. This means that we are required to apply for a TDA, however, we would like to emphasise that we do not see this as a long-term solution, and are working in collaboration with the CAA to support the development of integrated airspace that allows equitable use for all airspace users.

If you have any further questions or would like to schedule a meeting with either our healthcare or aviation team, please do not hesitate to contact us.

Kind regards

On Fri, 11 Aug 2023 at 16:30 [REDACTED] wrote:

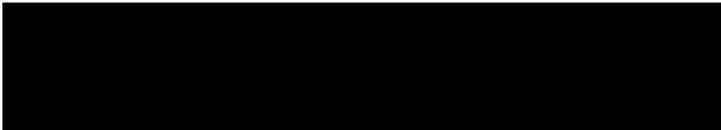
Thank you very much for your email.

We appreciate the time you have taken to respond to our stakeholder engagement and want to assure you that we are committed to reviewing and responding to all feedback received. We anticipate getting back to you as soon as possible. In the meantime, if you would like to talk to one of our team, please respond to this email and we will contact you.



[Airspace] Trial Plan Northumbria Stage 2 ACP-2023-015

1 message



14 August 2023 at 17:01

Name: [Redacted]
Email: [Redacted]
Representing: Self
Address: [Redacted]
Feedback:

I would like to register my strong objection to the use of Temporary Danger Areas to conduct the above trial. My main objection is the severe impact it will have on other airspace users. I operate a fixed wing aircraft from the grass strip at Stanton Farm (N55deg12'12" W01deg47'50") which will effectively be grounded during the 6 months of your trial. With regards to the Temporary Danger Areas (TDAs) proposed, they will force VFR traffic needing to transit North/South to request a zone crossing service from Newcastle airport ATC increasing their workload or chose to route far out to sea to the east or be forced through a much narrower 'pinch point' to the west between Danger area 512 and the edge of the Newcastle zone. You state that a Danger Area Crossing Service is not needed due to the low heights above ground needed but your proposed TDA rises to 1750 feet altitude to the west. A crossing service would allow both Stanton and Hexham grass Strips to continue to operate and would allow north/south transit routes to VFR aircraft that may not be equipped to complete a zone transit of Newcastle controlled airspace.

Sincerely yours
[Redacted]

Sent from my iPad





Re: [Airspace] Trial Plan Northumbria Stage 2 ACP-2023-015

1 message

22 August 2023 at 13:22

Dear 

Thank you very much for responding with feedback to our proposal. We appreciate the time it has taken to read the material and the constructive feedback you have provided. We would be more than happy to meet and discuss this with you, but in the meantime, we have addressed your points below.

Our intention is to work with the local GA community, including any local airfields or airstrips, to explore the possibility of operations working alongside each other. We, like the CAA and as I'm sure you do, believe that being able to share the airspace is ultimately the best solution for all stakeholders and this is a step along that path. It is extremely challenging to gain data on the GA operations at uncertified aerodromes, and proves why stakeholder engagement is an important part of the process. We have previously successfully demonstrated working in close proximity to microgliding and gliding clubs, and believe we could work with you and the broader GA community to achieve the same in this trial. We are in contact with Hexham and Stanton Airfield and are currently scheduling a visit to discuss our proposed trial in more detail with them.

Your feedback regarding the DACS and DAAIS is also extremely helpful and we will continue to re-evaluate this requirement based on feedback from the aviation community and refinement of the proposed airspace.

We are also inviting members of the aviation community to a feedback session to be held at [Wansbeck Hospital](#) on 24th August 2023, 5-7pm. The purpose of this session is to discuss and gather feedback on the ACP-2023-015 airspace change process. Members of the aviation and healthcare teams at Apian, along with representatives from the NHS and the drone operator will be present to listen and answer questions where possible.

The event is free and open to all, but attendance must be confirmed in advance. Please email airspace@apian.aero to book a place by the end of Wednesday 23rd August if you would like to attend.

If you are unable to attend and have any further questions or would like to schedule a meeting with either our healthcare or aviation team, please do not hesitate to contact us.

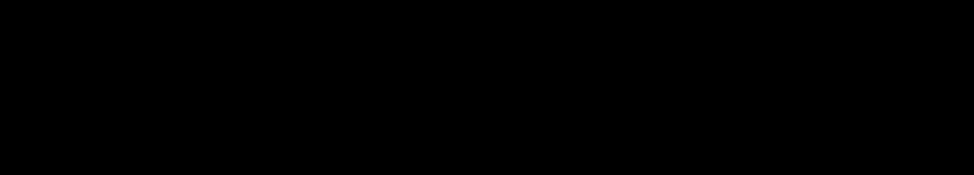
Kind regards

On Mon, 14 Aug 2023 at 17:39,  wrote:

Thank you very much for your email.

We appreciate the time you have taken to respond to our stakeholder engagement and want to assure you that we are committed to reviewing and responding to all feedback received. We anticipate getting back to you as soon as possible. In the meantime, if you would like to talk to one of our team, please respond to this email and we will contact you.

On Mon, 14 Aug 2023 at 17:02,  wrote:



I would like to register my strong objection to the use of Temporary Danger Areas to conduct the above trial. My main objection is the severe impact it will have on other airspace users.

I operate a fixed wing aircraft from the grass strip at Stanton Farm (N55deg12'12" W01deg47'50") which will effectively be grounded during the 6 months of your trial.

With regards to the Temporary Danger Areas (TDAs) proposed, they will force VFR traffic needing to transit North/South to request a zone crossing service from Newcastle airport ATC increasing their workload or chose to route far out to sea to the east or be forced through a much narrower 'pinch point' to the west between Danger area 512 and the edge of the Newcastle zone.

You state that a Danger Area Crossing Service is not needed due to the low heights above ground needed but your proposed TDA rises to 1750 feet altitude to the west.

A crossing service would allow both Stanton and Hexham grass Strips to continue to operate and would allow north/south transit routes to VFR aircraft that may not be equipped to complete a zone transit of Newcastle controlled airspace.

Sincerely yours



Sent from my iPad



[Airspace] Public Proposal Area [pID:546] OBJECTION

1 message

18 August 2023 at 09:01



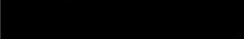
Dear Sirs

As a member of the Northumbria Gliding Club, I am writing to express my concern and objection regarding the proposed changes to the local airspace within the North East of England as detailed in the Public Proposal Area [pID:546] on the CAA Airspace Change Portal, and the impact such would have on our local flying.

No doubt you are aware of the article in the Flyer Magazine which highlights the consequences of the proposal, which I would not presume to paraphrase here.

I urge you to consider the implications and re-evaluate the proposed changes to our local airspace.

Thank you for your time.





Re: [Airspace] Public Proposal Area [pID:546] OBJECTION

1 message

22 August 2023 at 13:24

Dear [REDACTED]

Thank you very much for responding with feedback to our proposal.

Our stakeholder engagement is a valuable opportunity for us to gather knowledge and input directly from the aviators who fly within the area and know the Northumbria area best. We welcome any feedback specific to this ACP.

We are inviting members of the aviation community to a feedback session to be held at [Wansbeck Hospital](#) on 24th August 2023, 5-7pm. The purpose of this session is to discuss and gather feedback on the ACP-2023-015 airspace change process. Members of the aviation and healthcare teams at Apian, along with representatives from the NHS and the drone operator will be present to listen and answer questions where possible.

The event is free and open to all, but attendance must be confirmed in advance. Please email [REDACTED] to book a place by the end of Wednesday 23rd August.

If you are unable to attend and have any further questions or would like to schedule a meeting with either our healthcare or aviation team, please do not hesitate to contact us.

Kind regards

[REDACTED]

On Fri, 18 Aug 2023 at 14:17, [REDACTED] wrote:

Thank you very much for your email.

We appreciate the time you have taken to respond to our stakeholder engagement and want to assure you that we are committed to reviewing and responding to all feedback received. We anticipate getting back to you as soon as possible. In the meantime, if you would like to talk to one of our team, please respond to this email and we will contact you.

[REDACTED]

On Fri, 18 Aug 2023 at 09:01, [REDACTED] wrote:

Dear Sirs

As a member of the [REDACTED] am writing to express my concern and objection regarding the proposed changes to the local airspace within the North East of England as detailed in the Public Proposal Area [pID:546] on the CAA Airspace Change Portal, and the impact such would have on our local flying.

No doubt you are aware of the article in the Flyer Magazine which highlights the consequences of the proposal, which I would not presume to paraphrase here.

I urge you to consider the implications and re-evaluate the proposed changes to our local airspace.

Thank you for your time.



[Airspace] Airspace changes Northumberland

1 message



17 August 2023 at 12:32

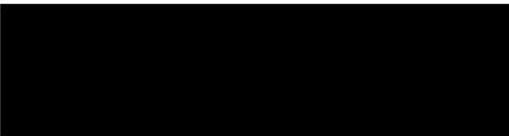
Name	
Email	
Representing	
Address (including postcode if possible)	
Feedback	
Introducing myself as Chairman of BVRMC as a stakeholder for any future plans to change the airspace we currently use to fly model aircraft.	

Sent from my iPhone



Re: [Airspace] Airspace changes Northumberland

1 message



22 August 2023 at 13:30

Dear [Redacted]

Thank you very much for sharing with us your contact details.

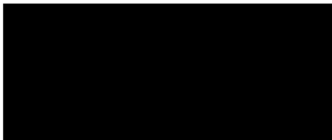
To ensure you get the latest news relating to the trial, including publications regarding changes to timelines, you can subscribe to updates on ACP-2023-015 through the Airspace Change Portal. We will also include you in our communications with stakeholders going forward.

We are inviting members of the aviation community to a feedback session to be held at [Wansbeck Hospital](#) on 24th August 2023, 5-7pm. The purpose of this session is to discuss and gather feedback on the ACP-2023-015 airspace change process. Members of the aviation and healthcare teams at Apian, along with representatives from the NHS and the drone operator will be present to listen and answer questions where possible.

The event is free and open to all, but attendance must be confirmed in advance. Please email airspace@apian.aero to book a place by the end of Wednesday 23rd August.

If you are unable to attend and have any further questions or would like to schedule a meeting with either our healthcare or aviation team, please do not hesitate to contact us.

Kind regards



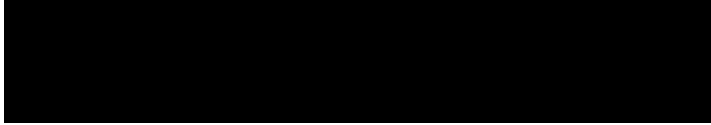
On Thu, 17 Aug 2023 at 12:32, [Redacted] wrote:

Name	[Redacted]
Email	[Redacted]
Representing	[Redacted]
Address (including postcode if possible)	[Redacted]
Feedback	Introducing myself as Chairman of BVRMC as a stakeholder for any future plans to change the airspace we currently use to fly model aircraft.



[Airspace] FW: Northumberland Drone trial. (Case Ref: GO24148)


1 message

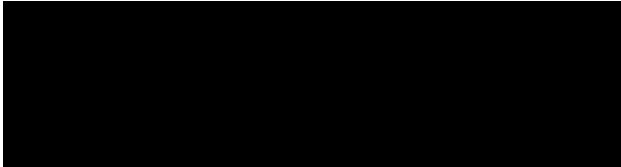


21 August 2023 at 08:32

Dear 

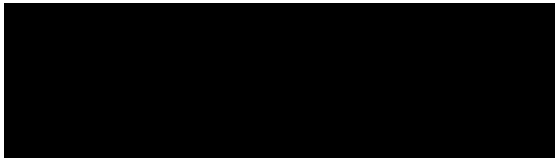
I am contacting you as the Member of Parliament for Hexham regarding Apian's Northumbria NHS drone system.

My constituent,  has raised a number of concerns regarding the impact flying the drones will have on a number of stakeholders and local businesses. Can I kindly ask that these concerns be addressed in an official response.



Sent from my iPhone

Begin forwarded message:



Hello Mr 

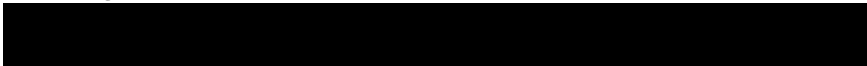
I am contacting you to make you aware of a drone trial that is being proposed by a private company called Apian. The proposed trial will close a considerable amount of airspace in Northumberland which is used by light aircraft. It will also close two airfields that have operated safely for several years.

The closure will last for six months from February next year which of course includes the summer months. This will effect the air ambulance and military training as well as various other users of the airspace (stakeholders). No provision has been made for emergency use of the proposed temporary danger area which endangers life.

The trial is to enable Apian to "gather data" for the use of delivering medical supplies to various NHS hospitals and surgeries as well as care homes. This job is currently being done by driver and electric vehicle and provides a reliable all weather service. Emergency supplies are provided by blood bikes which are a voluntary organisation.

To replace the current system would require several expensive drones and operators and will not be able to operate in all weathers. Please could you read the attached proposal and let me know if you require any further information. This proposal has caused a good deal of consternation in the aviation community. The date for response is September 22nd.

Best regards.





Re: [Airspace] FW: Northumberland Drone trial. (Case Ref: GO24148)

1 message

29 August 2023 at 10:17

Dear [REDACTED]

Thank you for your email and raising the concerns of your local constituent. We are sorry for the delay in getting back to you. The aviation team have been visiting Northumbria to speak to the local aviation community, as part of our engagement.

We would welcome a meeting with you to share details regarding the benefits Northumbria NHS hopes to gain from this trial, how we fit into the broader healthcare ecosystem and the further benefits this could bring to the region.

Please be assured that as part of the stakeholder engagement process we are going through, we address all concerns (and support) with an official response. This is also shared with the CAA, redacted and uploaded to the CAA's Airspace Change Portal.

To address the specific concerns of your constituent, we are already in contact with [REDACTED] and are looking forward to meeting him in person later this week to discuss our proposal and hear his feedback directly. We are planning to have further forums, enabling collaborative and constructive discussions. In the meantime, we have outlined answers to his points in his email to you below.

Apian was founded by two NHS doctors and all of our work is focused on providing improved healthcare to our patients and clinicians. We are working directly with the Northumbria Healthcare NHS Foundation Trust, to provide an on-demand delivery service in the most rural NHS Trust in England.

We are currently in Stage 1 of the airspace change process, this allows us the opportunity to gain feedback from the wider aviation stakeholders on our proposal. This process is governed by the Civil Aviation Authority (CAA). It is not until this stakeholder engagement has been completed that we are able to have a complete view of operations in the area. Following stakeholder engagement, we will review all the feedback and reevaluate our proposal. All stakeholder engagement will be presented to the CAA as part of the process.

Our intention is to work with the local GA community, including any local airfields or airstrips, to explore the possibility of operations working alongside each other. We, like the CAA and as I'm sure you do, believe that being able to share the airspace is ultimately the best solution for all stakeholders and this is a step along that path. It is extremely challenging to gain data on the GA operations at uncertified aerodromes, and proves why stakeholder engagement is an important part of the process.

We have previously successfully demonstrated working in close proximity to microgliding and gliding clubs, and believe we could work with the broader GA community to achieve the same in this trial. We are in contact with Hexham and Stanton Airstrips and hope to work collaboratively with them to ensure we can provide this service which will support the local community.

Our previous trial conducted over 200 successful flights. [Here](#) is a link to the report from our project. The focus of this trial is on healthcare integration, the benefits to the patients and the wider healthcare system, whilst safely implementing UAS technology. During that operation, we worked closely with the Air Ambulance service, Military, Maritime Coastguard Agency and National Police Air Services to ensure procedures were in place to allow them access to the airspace at short notice for operations. Whilst these have not yet been agreed for this proposal, as we are at the stakeholder engagement stage, we have already started discussions with those operators.

If you have any further questions or would like to schedule a meeting with either our healthcare or aviation team, please do not hesitate to contact us.

Kind regards

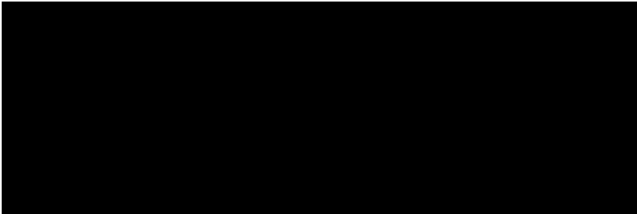


On Mon, 21 Aug 2023 at 08:33, [Redacted] wrote:

Dear [Redacted]

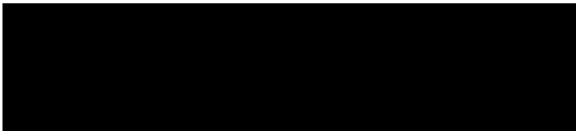
I am contacting you as the Member of Parliament for Hexham regarding Apian's Northumbria NHS drone system.

My constituent [Redacted] has raised a number of concerns regarding the impact flying the drones will have on a number of stakeholders and local businesses. Can I kindly ask that these concerns be addressed in an official response.



Sent from my iPhone

Begin forwarded message:



Subject: Northumberland Drone trial.

Hello [Redacted]

I am contacting you to make you aware of a drone trial that is being proposed by a private company called Apian. The proposed trial will close a considerable amount of airspace in Northumberland which is used by light aircraft. It will also close two airfields that have operated safely for several years.

The closure will last for six months from February next year which of course includes the summer months. This will effect the air ambulance and military training as well as various other users of the airspace (stakeholders). No provision has been made for emergency use of the proposed temporary danger area which endangers life.

The trial is to enable Apian to "gather data" for the use of delivering medical supplies to various NHS hospitals and surgeries as well as care homes. This job is currently being done by driver and electric vehicle and provides a reliable all weather service. Emergency supplies are provided by blood bikes which are a voluntary organisation.

To replace the current system would require several expensive drones and operators and will not be able to operate in all weathers. Please could you read the attached proposal and let me know if you require any further information. This proposal has caused a good deal of consternation in the aviation community. The date for response is September 22nd.

Best regards.



Sent from my iPhone

UK Parliament Disclaimer: this e-mail is confidential to the intended recipient. If you have received it in error, please notify the sender and delete it from your system. Any unauthorised use, disclosure, or copying is not permitted. This e-mail has been checked for viruses, but no liability is accepted for any damage caused by any virus transmitted by this e-mail. This e-mail address is not secure, is not encrypted and should not be used for sensitive data.

Aviation team at [REDACTED]

A feedback form is provided, and a word document is attached to the email containing this material for your use if you wish.

Responses regarding the proposed trial TDA submission must be received by 22nd September 2023.

Name	[REDACTED]
Email	[REDACTED]
Representing	[REDACTED]
Address (including postcode if possible)	[REDACTED]

Feedback: Whilst the proposed trial TDA does not appear to have any direct implications for our club or activities you should be aware that we operate large radio-controlled model aircraft from this site under a site permit issued by the Large Model Association. The permission is backed up by a permanent entry in the CAA Aeronautical Information Publication allowing operation up to 1500ft AGL for all models up to a maximum take-off mass of 150Kg. Given the remote location of the site we would not expect the TDA or your operations to impact us however the size of models operated by our members mean that any infringements of our airspace would be unwelcome and could have serious consequences for both our models and your UAV's.



Re: [Airspace] Feedback Form

1 message

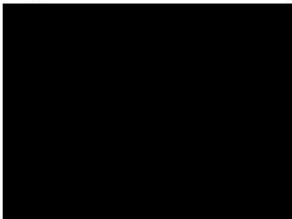


31 August 2023 at 17:05

Dear [Redacted]

Thank you very much for your email and for informing us of your operations. To ensure you get the latest news relating to the trial, you can subscribe to updates on [ACP-2023-015](#) through the Airspace Change Portal. We will also include you in our communications with stakeholders going forward.

If you have any further questions or would like to schedule a meeting with either our healthcare or aviation team, please do not hesitate to contact us.



On Tue, 22 Aug 2023 at 13:03, '[Redacted]' wrote:

Please find attached a feedback form from [Redacted]

Kind Regards.



Sent from [Mail](#) for Windows

Dear Stakeholder,

Request for support to [ACP-2023-015](#) Northumbria Healthcare NHS Foundation Trust feasibility flights within a trial Temporary Danger Area (TDA).

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

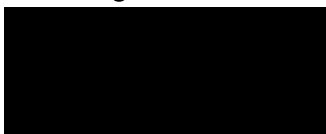
Apian, in conjunction with the Northumbria Healthcare NHS Foundation Trust, is looking to conduct feasibility flights using UAS between hospitals, GP surgeries, care homes and pharmacies. We would like to trial a regular, on-demand delivery service for the distribution of medical payloads such as, prescription medication, medical implants, medical electronics, blood packs, medical and consumable supplies, medical documentation, as well as emergency deliveries. These flights will allow us to research, validate and provide vital data to establish whether the use of UAS, in these clinical settings will lead to improved patient care.

You may have supported us on our previous project in Northumbria ([ACP-2022-031](#)), and we would like to thank you for the support and feedback you provided during and after the [project](#). That feedback allowed us to gain an understanding of how we can better integrate UAS. Please see the summary and lessons learnt during that project [here](#).

As part of our application for a trial TDA, we have identified you as a key stakeholder. We have attached our trial plan for our proposal which includes details of our trial TDA in Annex C. We have also included a feedback form which we kindly request you return to us before the end of our stakeholder engagement period, 22nd September 2023, and look forward to receiving your confirmation of support.

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

Kind regards,




How to provide feedback

Apian welcomes comments and feedback from all interested parties. All comments received regarding this proposal will be taken into consideration before a final design is submitted to the CAA. All the details of this airspace change proposal are available on the [CAA's Airspace Change Portal](#). Feedback on the proposed trial TDA, or requests for further information should be sent to:

Aviation team at airspace@apian.aero

A feedback form is provided and a word document is attached to the email containing this material for your use if you wish.

Responses regarding the proposed trial TDA submission must be received by 22nd September 2023.

Name	
Email	
Representing	
Address (including postcode if possible)	
Feedback:	It is disappointing to note that you Trial Plan 2023-015 has failed to identify the Port of Blyth as a Stakeholder. Notwithstanding the work undertaken by the wider Port, Texo operate their Port Services division from Blyth. Operations there frequently involve heavy lifting using large marine cranes, work on different types of offshore Installations such as jack ups of varying heights all of which impact the TDA. Furthermore, Port Services frequently utilise Texo DSI to conduct UAS operations to support lifting operations and inspection work at the Port. A blanket TDA would severely hinder our ability to respond quickly to events risking increased working at height and placing individuals at risk. Furthermore, it is widely reported that previous Apian NOTAMS have remained active when delivery flights are not being undertaken. Texo would look to receive assurances that NOTAM activation would only be undertaken when necessary and that should an urgent requirement arise for a UAS operation to be undertaken at Port of Blyth, dispensation would be given to allow flight within the Port within our CAA OSC. Texo are supportive of the operation and the wider expansion of BVLOS operations but this cannot be at the exclusion of all other airspace users.



Re: [Airspace] Northumberland TDA

1 message

31 August 2023 at 16:53

Dear [REDACTED]

Thank you so much for your email, we appreciate you reaching out to us, identifying yourself as a stakeholder and showing your support for this operation. Despite our best efforts to capture all stakeholders, we occasionally may miss some which is why stakeholder engagement is incredibly important.

We want to assure you that if our proposal is approved, we have no intention to restrict your activities and would like to work collaboratively with you to ensure we have a suitable safe solution in place that works for all. We have experience of working with other aviation operators, including local UAS VLOS operators, to allow safe integration within the same airspace in previous similar trials.

We are currently in Stage 1 of the airspace change process, this allows us the opportunity to gain feedback from the wider aviation stakeholders on our proposal. It is not until this stakeholder engagement has been completed that we are able to have a complete view of operations in the area. Following stakeholder engagement, we will review all the feedback and reevaluate our proposal.

Regarding NOTAMs in our previous trial, these were cancelled by the UAS operator directly when we did not anticipate flying. As per the NOTAM process, these were cancelled through the Airspace Regulation (Utilisation) Operations team at the CAA, who communicate them to the aviation industry. Cancellations of usage for the TDA was due to daily limitations (i.e weather), which is why cancellations were not seen in advance as we utilised the TDA to complete as many deliveries, and capture as much data for the NHS as possible. If you have suggestions to improve the safe sharing of this information, please let us know and we can discuss them with the CAA.

To ensure we capture your area of operations correctly in our feedback, would it be possible to arrange a call to discuss with you?

[REDACTED]

On Tue, 22 Aug 2023 at 12:17, [REDACTED] wrote:

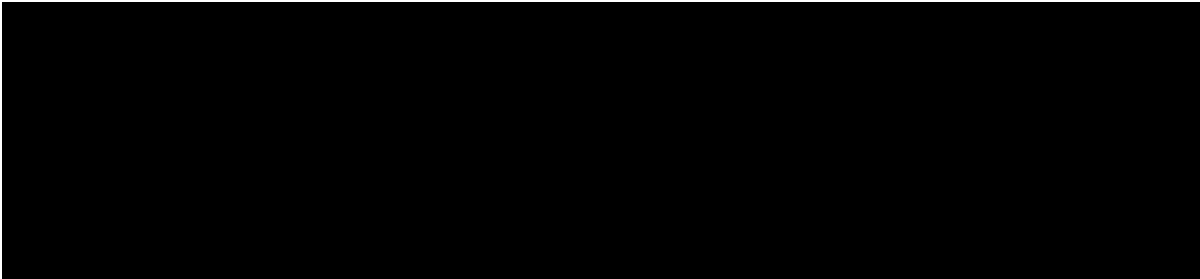
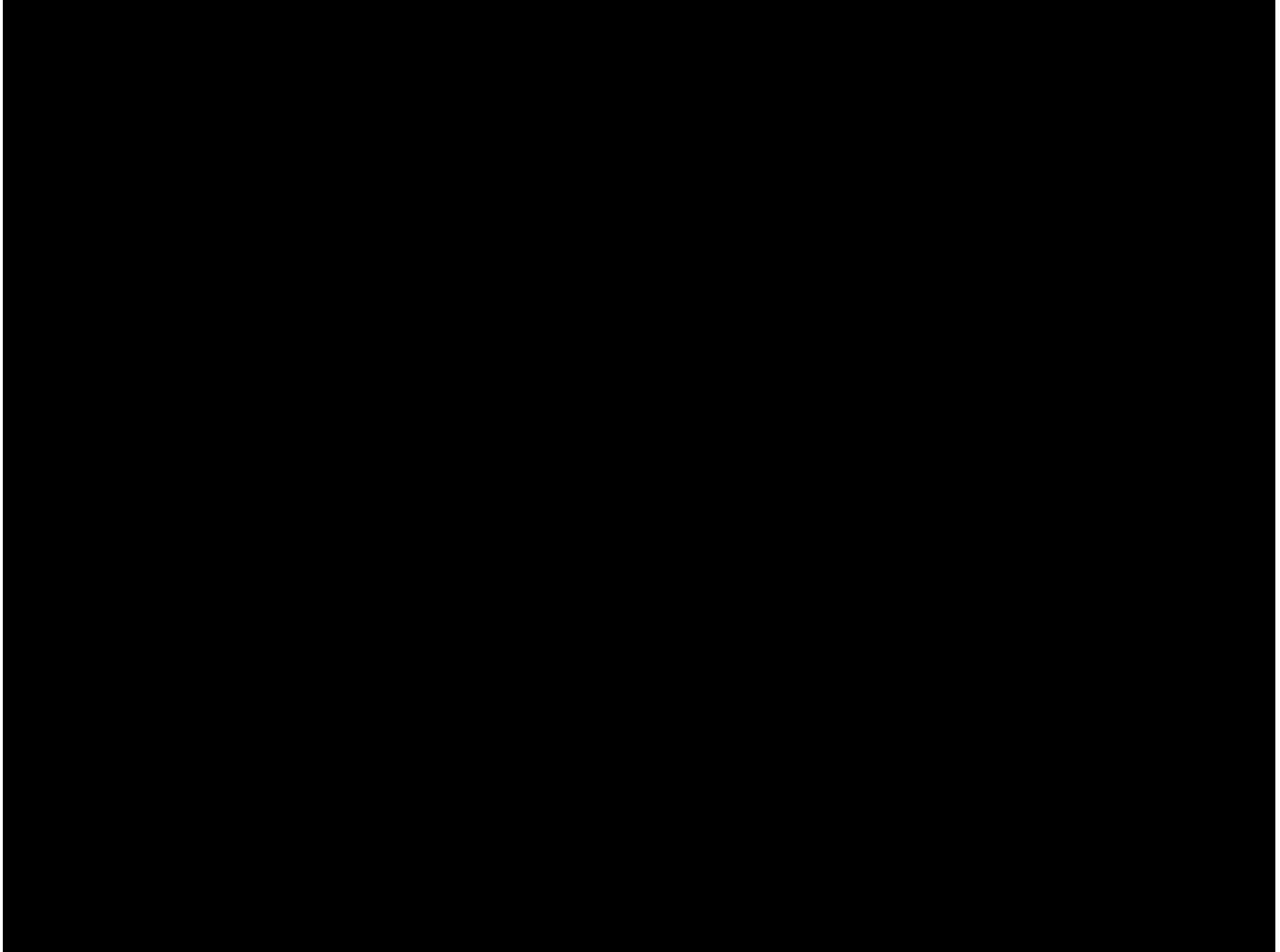
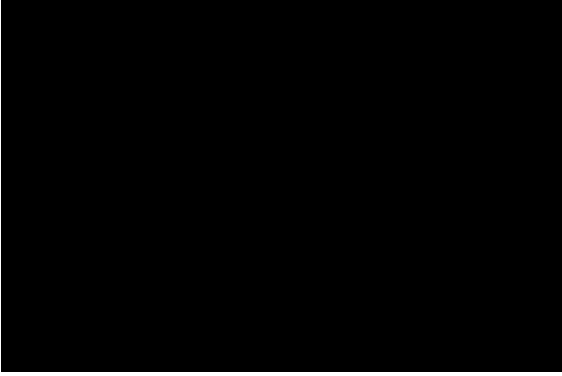
Good Afternoon,

In response to your proposed TDA in Northumberland, please find attached a response on behalf of Texo Group Ltd.

As outlined in the feedback form, we are supportive of what Apian are trying to do and support the expansion of BVLOS operations in the UK however, the use of TDAs has to be proportionate, managed properly and not at the exclusion of other legitimate users.

If you have any further questions then please do not hesitate to contact me.

Regards,





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RE: [Airspace] Trial of U A in Northumberland.

1 message

1 September 2023 at 09:48


Good Morning,

Further to your email below, during the proposed trial period in 2024 we will be hosting 9 race meetings. Please find listed below the dates of the 9 fixtures, I have also included the dates of all our fixtures in 2024 in the event the trial period is extended. It is possible we may be awarded an extra fixture throughout the year if this was to happen we would give you notice.

Please be aware that we suffer from unauthorised drones flying overhead at some of our race meetings and these can number up to four at any one time. These drones usually take to the air just prior to a race commencing and land very shortly after a race is finished. The drones are usually stationery and there can be up to 3 located just to the south of the racecourse and 1 north. We do not give permission for these flights and are unable to stop them from flying.

The dates of the fixtures are as follows.

Thursday 14th March.

Tuesday 9th and Monday 22nd April.

Saturday 4th (Evening), Saturday 11th, Tuesday 21st (Evening) May.

Saturday 1st, Saturday 15th, Sunday 23rd June.

Friday 4th, Saturday 12th October.

Friday 8th, Wednesday 20th November.

Wednesday 11th December.

On the two evening meetings racing will not commence until approx. 4.30pm, the meetings on Saturday 11th May, Saturday 1st and 15th June it is possible racing will not start until 4.00pm or even later.

I hope you find the above information useful and if there is anything further you need please let me know.

Best



Dear 

Thank you very much for responding with feedback to our proposal. We appreciate the time it has taken to read the material and the constructive feedback you have provided. We would be more than happy to meet and discuss this with you, but in the meantime, we have addressed your points below.

We understand your concerns regarding access to the area for emergency services at short notice, especially at your racecourse. We want to assure you, as a healthcare company, that we will absolutely prioritise the emergency services operations over our operations at all times. We successfully demonstrated this in our previous trial where we conducted over 200 UAS flights. During that operation, we worked closely with the Air Ambulance service, Military, Maritime Coastguard Agency and National Police Air Services to ensure procedures were in place to allow them access to the airspace at short notice for their operations. Whilst these have not yet been agreed for this proposal, as we are at the stakeholder engagement stage, we have already started discussions with those operators. Here is a link to the report from our project where you can see we have reported on the number of entry requests and approvals from them for access to our TDA.

Regarding your operations, if you could provide us with details of any events that you hold at Hexham racecourse that require helicopters or drones to routinely operate at the site, that would be much appreciated. This would help provide us with a better understanding of the local aviation operations and help us with our review of the proposal.

If you have any further questions or would like to schedule a meeting with either our healthcare or aviation team, please do not hesitate to contact us.

On Tue, 22 Aug 2023 at 14:26,  wrote:

To Whom It may Concern,

Please find a response to your paper regarding the proposed trial in conjunction with Northumbria Healthcare for UA to take place between 12th February and 12th September 2024.

I look forward to hearing from you in due course.

Regards

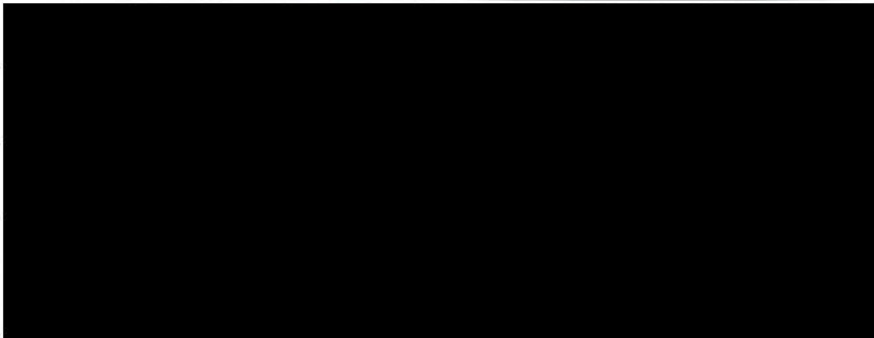
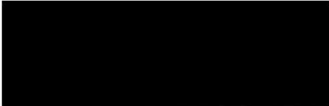




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Name	
Email	
Representing	
Address (including postcode if possible)	
Feedback:	<p>We operate Hexham Racecourse which will be situated in the TDA should the trials of the UA proceed. My concern is that we have had occasion to use the North East Ambulance in the past to airlift jockeys to hospital following a bad fall. I understand that you are in discussion with the NEAA i assume that is for them to use the air space in the TDA if necessary. I have emailed the NEAA seperately but my concern would be if we required them through a race meeting and they were unable to fly because of the introduction of a TDA.</p> <p>I look forward to hearing from you with your comments.</p> <p>Regards</p> 

3.9. Post engagement

A copy of this material has been uploaded to the CAA Airspace Change Portal. Apian will produce an engagement summary report which will be presented to the CAA as part of the sponsor application. This will include details of how the engagement was conducted, all the feedback provided from the stakeholders and how the feedback has influenced the final airspace design. Redacted versions of that report will be uploaded to the CAA Airspace Change Portal following submission. Once the CAA has made a decision on the final airspace design, Apian will advise all stakeholders of the outcome.

While the TDA complex is in operation, Apian will monitor any feedback received on the CAA Airspace Change Portal or received directly by email or phone and collate the feedback and provide regular updates to the CAA when the TDA is activated and after it has been deactivated.



Re: [Airspace] Trial of U A in Northumberland.

1 message

4 September 2023 at 20:41

Hi [REDACTED]
Thank you so much for providing us with this information. This is extremely helpful.
We will be in touch if we have any more questions, but in the meantime please do let us know if you have any further questions or comments.

Kind regards,
[REDACTED]

On Fri, 1 Sept 2023 at 09:46 [REDACTED] wrote:

Good Morning,

Further to your email below, during the proposed trial period in 2024 we will be hosting 9 race meetings. Please find listed below the dates of the 9 fixtures, I have also included the dates of all our fixtures in 2024 in the event the trial period is extended. It is possible we may be awarded an extra fixture throughout the year if this was to happen we would give you notice.

Please be aware that we suffer from unauthorised drones flying overhead at some of our race meetings and these can number up to four at any one time. These drones usually take to the air just prior to a race commencing and land very shortly after a race is finished. The drones are usually stationary and there can be up to 3 located just to the south of the racecourse and 1 north. We do not give permission for these flights and are unable to stop them from flying.

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Wednesday 11th December.

On the two evening meetings racing will not commence until approx. 4.30pm, the meetings on Saturday 11th May, Saturday 1st and 15th June it is possible racing will not start until 4.00pm or even later.

I hope you find the above information useful and if there is anything further you need please let me know.

Best
[REDACTED]

[REDACTED]

[REDACTED]

Dear [REDACTED]

Thank you very much for responding with feedback to our proposal. We appreciate the time it has taken to read the material and the constructive feedback you have provided. We would be more than happy to meet and discuss this with you, but in the meantime, we have addressed your points below.

We understand your concerns regarding access to the area for emergency services at short notice, especially at your racecourse. We want to assure you, as a healthcare company, that we will absolutely prioritise the emergency services operations over our operations at all times. We successfully demonstrated this in our previous trial where we conducted over 200 UAS flights. During that operation, we worked closely with the Air Ambulance service, Military, Maritime Coastguard Agency and National Police Air Services to ensure procedures were in place to allow them access to the airspace at short notice for their operations. Whilst these have not yet been agreed for this proposal, as we are at the stakeholder engagement stage, we have already started discussions with those operators. Here is a link to the report from our project where you can see we have reported on the number of entry requests and approvals from them for access to our TDA.

Regarding your operations, if you could provide us with details of any events that you hold at Hexham racecourse that require helicopters or drones to routinely operate at the site, that would be much appreciated. This would help provide us with a better understanding of the local aviation operations and help us with our review of the proposal.

If you have any further questions or would like to schedule a meeting with either our healthcare or aviation team, please do not hesitate to contact us.

[REDACTED]

 Image removed by sender.

On Tue, 22 Aug 2023 at 14:26, [REDACTED] wrote:

To Whom It may Concern,

Please find a response to your paper regarding the proposed trial in conjunction with Northumbria Healthcare for UA to take place between 12th February and 12th September 2024.

I look forward to hearing from you in due course.

Regards



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Re: [Airspace] Trial of U A in Northumberland.

1 message

31 August 2023 at 17:01

Dear [REDACTED]

Thank you very much for responding with feedback to our proposal. We appreciate the time it has taken to read the material and the constructive feedback you have provided. We would be more than happy to meet and discuss this with you, but in the meantime, we have addressed your points below.

We understand your concerns regarding access to the area for emergency services at short notice, especially at your racecourse. We want to assure you, as a healthcare company, that we will absolutely prioritise the emergency services operations over our operations at all times. We successfully demonstrated this in our previous trial where we conducted over 200 UAS flights. During that operation, we worked closely with the Air Ambulance service, Military, Maritime Coastguard Agency and National Police Air Services to ensure procedures were in place to allow them access to the airspace at short notice for their operations. Whilst these have not yet been agreed for this proposal, as we are at the stakeholder engagement stage, we have already started discussions with those operators. [Here](#) is a link to the report from our project where you can see we have reported on the number of entry requests and approvals from them for access to our TDA.

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I look forward to hearing from you in due course.

Regards



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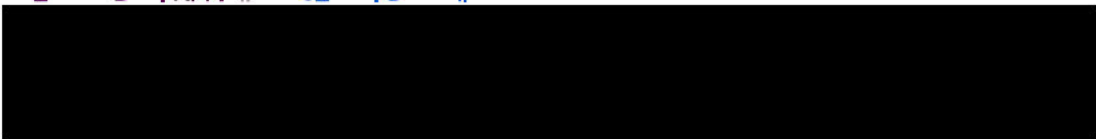
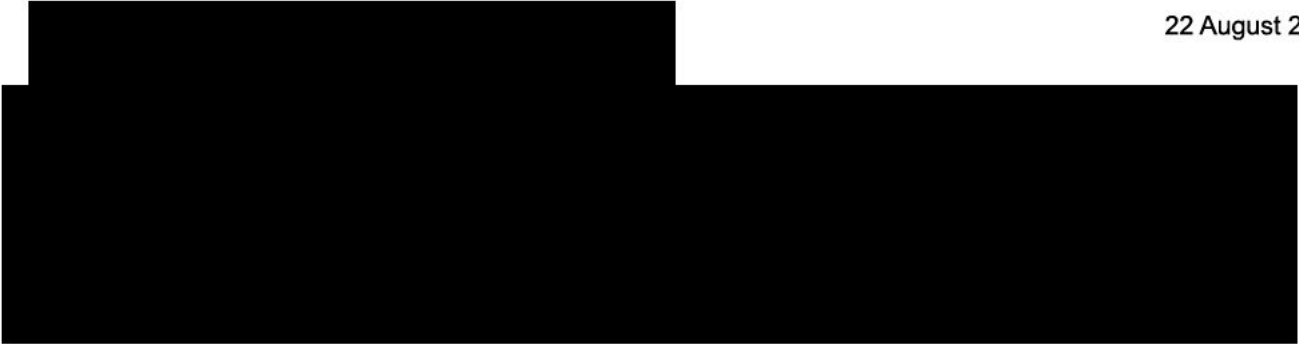
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Fwd: FW: NHS Apian Trial 2024

22 August 2023 at 14:45



You don't often get email from [redacted] [learn why this is important](#)

WARNING: This email came from a sender external to the trust. Please treat links and attachments with caution.

Hi [REDACTED]

I hope you and all our friends in Northumbria NHS are well.

[REDACTED]

I wanted to write today to give you a flavour of the real concerns in the light aviation community without being too technical! I feel you will be largely unsighted and as ever, am sure you will want to progress the trial with minimal disruption to the flying community.

I won't question the viability of the UAS delivery method though I do hope you will investigate other, all weather, green delivery solutions that can deliver on time and at required scale. I further hope that they will also qualify for significant Government SBRI funding (I understand Apian were awarded £799k for this trial).

Sadly, the current proposed design has huge negative consequences for the local and national flying community. I feel it is a very poor and blunt design that with more thought, could have negated many of the community's concerns. The various National Flying Associations are preparing robust challenges whilst a complaint has been forwarded directly to the CAA regulator. Flyer magazine used my feedback to Apian as a basis for a news article;

<https://flyer.co.uk/severe-and-negative-impact-if-northumbria-tda-goes-ahead/>

Closure of Local Airstrips

The proposed design, when active, closes two local grass airstrips at Hexham and Stanton near Morpeth. They are long-established and home to around 10 light aircraft. Disappointingly, both operators spoke to Apian in the design phase and were re-assured, only to find the subsequent proposed design closes their strips. This has caused both owners considerable angst and I feel led to a breakdown of trust with Apian. As well as stopping them flying and enjoying their hobby, the farms income from hangarage (part of farm diversification) will be adversely affected if aircraft are forced to relocate for the trial duration. It is somewhat ironic that the NHS trial is directly affecting the mental well-being of those involved.

Closure/Restriction of Key General Aviation Routes

The UAS will operate below 400 Above Ground level (AGL). Away from airfields and airstrips, this would generally not be an issue and we could all operate normally. However, Apian's design takes the highest point in any given area and adds 400ft and then a further 200ft safety margin and uses that as the datum for whole area. So for example, in the Tyne Valley, a key coast to coast low-level transit route, it takes the highest point on the surrounding hills and adds 600ft. As a result, the Temporary Danger Area is over 1500ft above the ground in the Tyne Valley and blocks this key route when the cloud is lower. Quite simply it will be virtually impossible to go Coast-to-Coast when there is a low cloud base.

Another key route is up and down the coast under the 1500ft base of the Newcastle Zone. Heat maps from the last three years show this is the most used transit route for light aircraft between the NE/Scotland and the South. Again, Apian have closed this route as the Temporary Danger Area extends up to 1300ft above the water (presumably part of a large, lateral safety margin as I don't think the drones plan to operate over water?). There is no need to block over water areas to such a height, if UAS do need to operate there, then of course the vertical limit should be limited to 600ft above the water which will allow this vital transit route to continue.


One Flight Instructor in his feedback to Apian, highlighted that the closure of these routes to his students will impact both his business and his mental well-being. I don't want to overegg that angle but it is a fact that the trial design in its current form is causing significant upset and concern to our community. I do feel Apian have alienated the Community - we get a lot of platitudes but as the strip example showed, concerns appear to be ignored with no real positive action to resolve.

To be frank, the current design is very poor – the closure of airstrips and wider draconian airspace restrictions are disproportionate, they negatively impact people's lives and place other air users at increased risk. Confidence in Apian has been undermined will be very hard to win back.

But it's not too late. My hope in writing to you is to highlight the deep and real concerns amongst our community and hope that you, as the Sponsor, will encourage Apian to work on real solutions that result in the trial being able to proceed with minimal impact on the wider flying Community.

Very best of luck.

[REDACTED]



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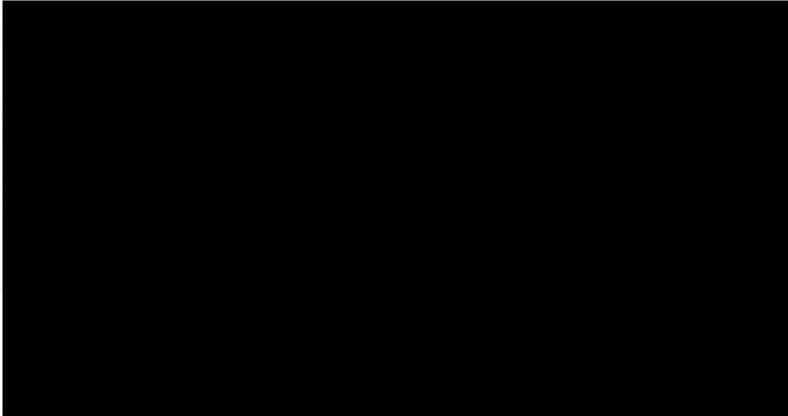


Aviation team at airspace@apian.aero

RWD 22/8/23

A feedback form is provided and a word document is attached to the email containing this material for your use if you wish.

Responses regarding the proposed trial TDA submission must be received by 22nd September 2023.

Name	
Email	
Representing	
Address (including postcode if possible)	

Feedback:

I would like to voice my objection to the restrictions being applied to free fliers in the Northumberland Area as a consequence of the trial of drone equipment. I make this objection on the basis of

- 1) Lack of consultation
- 2) Lack of technology in the drones to detect other air users in their proximity
- 3) The danger therefore that these devices pose to free fliers.
- 4) Should these devices stray beyond

their designated area they therefore represent a potential mortal peril to other forms of aviation who are legitimately exercising their right to use the airspace



Re: [Airspace] Airspace Objection

1 message

31 August 2023 at 16:57

Dear [REDACTED]

Thank you very much for responding with feedback to our proposal. We appreciate the time it has taken to read the material and the constructive feedback you have provided. We would be more than happy to meet and discuss this with you, but in the meantime, we have addressed your points below.

1. Lack of consultation

We are currently in Stage 1 of the airspace change process and are undertaking stakeholder engagement at this time. Stage 1 allows us the opportunity to gain feedback from the wider aviation stakeholders on our proposal. It is not until this stakeholder engagement has been completed that we are able to have a complete view of operations in the area. Following stakeholder engagement, we will review all the feedback and reevaluate our proposal. The stages for a trial airspace change can be found on the [CAA Airspace Change Portal](#) and details can be found in [CAP1616](#).

2. Lack of technology in the drones to detect other air users in their proximity

We would like to emphasise that we do not see this as a long-term solution and are working in collaboration with the CAA to support the development of integrated airspace that allows equitable use for all airspace users. Our UAS operator intends to seek CAA guidance on compliantly deploying detect and avoid technology to remove the need for segregated airspace, in line with the Airspace Modernisation Strategy.

3. The danger therefore that these devices pose to free fliers

In addition to the airspace change process, the UAS operator must receive Operational Authorisation from the CAA prior to the commencement of flight operations. This application will not form part of the airspace change request but is linked to the specific airspace. The Operational Authorisation covers many of the safety aspects that are related to the UAS, procedures and operation itself.

4. Should these devices stay beyond their designated area they therefore represent a potential mortal peril to other forms of aviation who are legitimately exercising their right to use the airspace

Our proposal is to conduct these feasibility flights in a Temporary Danger Area (TDA) which provides safe segregated airspace for our operations. This trial will help support the long term plan to better understand how UAS and other aviators can safely share airspace.

If you have any further questions or would like to schedule a meeting with either our healthcare or aviation team, please do not hesitate to contact us.

On Tue, 22 Aug 2023 at 19:35, [REDACTED] wrote:

Dear Aviation Team

Please find attached the feedback from myself and my wife; [REDACTED] regarding the airspace restrictions due in Northumberland. We are both BHPA members and members of the Wingbeat club.

Please advise if you need any further information.

Regards

[REDACTED]

Aviation team at [REDACTED]

A feedback form is provided and a word document is attached to the email containing this material for your use if you wish.

Responses regarding the proposed trial TDA submission must be received by 22nd September 2023.

Name	[REDACTED]
Email	[REDACTED]
Representing	[REDACTED]
Address (including postcode if possible)	[REDACTED]
Feedback:	<p>I am concerned that this may cause serious accidents to paragliders & hang gliders pilots, with little tangible benefits to the NHS. Roads in Northumberland are rarely so busy and I think the potential dangers do not outweigh the make this worthwhile. I can understand the use of drops over busy cities but not across such large swathes of the countryside.</p>



[Airspace] Airspace objection

1 message

8 September 2023 at 11:54

Dear [REDACTED]

Thank you very much for responding with feedback to our proposal. We appreciate the time it has taken to read the material and the constructive feedback you have provided. We would be more than happy to meet and discuss this with you, but in the meantime, we have addressed your points below.

Apian was founded by two NHS doctors, and all of our work is focused on providing improved healthcare to our patients and clinicians. We are working directly with the Northumbria Healthcare NHS Foundation Trust, to provide an on-demand delivery service in the most rural NHS Trust in England. This trial builds on the previous trial by demonstrating other use cases that would bring valuable healthcare benefits for our patients and clinicians in the region. This UAS service will add additional capabilities and bring new benefits to existing ground NHS logistics services. We are happy to follow up in more detail regarding the benefits Northumbria NHS hope to gain from this trial and how we fit into the broader healthcare ecosystem.

Our stakeholder engagement is a valuable opportunity for us to gather knowledge and input directly from the aviators who fly within the area and know the Northumbria area best. We welcome any feedback specific to this ACP.

If you have any further questions or would like to schedule a meeting with either our healthcare or aviation team, please do not hesitate to contact us.

Kind regards



[Airspace] Consultation - Northumbria Stage 2 2023-015

1 message

22 August 2023 at 20:33

Hi

I wish to respond to the consultation regarding Northumbria Stage 2 ACP 2023-015.

Area B

At present the East coastline under the base of the Newcastle CTA is a busy transit route for VFR GA traffic and also allows non-radio equipped aircraft to operate with relative freedom. Area B as good as removes this route and will force east coast traffic to seek a formal zone transit with Newcastle ATC. This is a poorly thought-out consequence, expecting increased numbers of GA aircraft to seek transits and clogging Newcastle's airspace and frequency. They are already short-staffed, have had a NOTAM to that effect for many months now and operating with reduced hours and closures. Nobody can seriously think that this is a safe way to go about business, or in the extreme have non-radio traffic tracking miles out to sea to avoid the airspace.

Area C & D

This would close the Hexham and Stanton airfields and this does not seem to be in the spirit of the overriding objective for minimising impact on other airspace users.

The vertical limits of 1750' and 2000' respectively, are particularly limiting, given that in those high ground areas the cloud base would not have to be excessively low in order to completely close that route off to GA and/or VFR traffic between the coasts.

In reality, your proposal only reduces safety for other users by shrinking the remaining airspace available. This only increases the risks by squeezing other users closer together in a less appropriate manner and you have not been able to demonstrate otherwise, or detail any mitigation measures including a DACS or show willingness to deactivate a TDA. An airspace grab for an area larger than Newcastle CTR is preposterous and wildly disproportionate for an unnecessary reason. I can only assume that it is a 'shot to nothing', using the logic that asking for the world, knowing that you won't get it, but might get something, must be the strategy being applied.

Brief research shows that in 2020, your original purpose was to transport Covid-19 samples, test-kits and PPE, while avoiding courier call-out waiting times, free-up NHS staff, reduce unnecessary physical contact and minimise the risk of secondary transmission of the virus. I think most reasonable people could see the benefits at a time of exceptional national crisis and airspace use was obviously at an absolute minimum. But it does not translate out of those extraordinary times.

The case for using drones for this purpose does not stack up either financially, logistically or in terms of quantities. In the Northumbria GA community, we are fortunate to have a good number of healthcare professionals, including clinical, administrative and logistics who are very familiar with the requirements and challenges alike. Applying their knowledge of the field, post-covid, you appear to be trying to find a question that fits your answer. While exploring the use of technology in new applications is admirable, an objective, external assessment of this one would only conclude that it has limited viability if used alongside conspicuity / detect and avoid capability within existing airspace design. It appears to have simply no realistic and sustainable viability in current form, making permanent and extensive changes to airspace inappropriate.

Your website states that no NHS funding is being used in this project, however, you were one of twenty projects receiving a share of £7M of government funding, albeit relating specifically to the Covid response. Therefore, I will be following with interest to see if further funding is provided. Myself and others will also be writing to MPs to strongly advocate that no further government funding is forthcoming when we are all too aware that the NHS can ill afford to waste more money.

For these reasons, I object in the strongest terms.

Regards

A solid black rectangular box used to redact the sender's name and contact information.



Re: [Airspace] Consultation - Northumbria Stage 2 2023-015

1 message

8 September 2023 at 11:57

Dear [REDACTED]

Thank you very much for responding with feedback to our proposal. We appreciate the time it has taken to read the material and the constructive feedback you have provided. We would be more than happy to meet and discuss this with you, but in the meantime, we have addressed your points below.

As previous air traffic controllers we have knowledge of and appreciate the restrictions you might face when flying, and getting a perspective from a pilot who flies in the local area is extremely important. Your feedback will help us continue the airspace change process by taking into consideration the feedback we have received to develop a more refined airspace.

Our intention is to work with the local GA community, including any local airfields or airstrips, to explore the possibility of operations working alongside each other. We, like the CAA and as I'm sure you do, believe that being able to share the airspace is ultimately the best solution for all stakeholders and this is a step along that path. It is extremely challenging to gain data on the GA operations at uncertified aerodromes, and proves why stakeholder engagement is an important part of the process.

We have previously successfully demonstrated working in close proximity to microgliding and gliding clubs, and believe we could work with you and the broader GA community to achieve the same in this trial. We are in contact with both Hexham and Stanton Airstrips, who continue to be extremely helpful in sharing information about their operations. We hope to work collaboratively with them to identify a solution where both operations can safely co-exist together, but will make adjustments to our request if we cannot.

Apian is being supported and guided by Newcastle International Airport ATC regarding operations in close proximity to Newcastle Airport. We will continue to re-evaluate the DACS and DAAIS requirements based on feedback from the aviation community and refinement of the airspace.

Apian was founded by two NHS doctors, and all of our work is focused on providing improved healthcare to our patients and clinicians. We are working directly with the Northumbria Healthcare NHS Foundation Trust, to provide an on-demand delivery service in the most rural NHS Trust in England. This trial builds on the previous trial by demonstrating other use cases that would bring valuable healthcare benefits for our patients and clinicians in the region. This UAS service will add additional capabilities to existing ground couriers. We are happy to follow up in more detail regarding the benefits Northumbria NHS hope to gain from this trial and how we fit into the broader healthcare ecosystem.

Current regulations mean that we are required to apply for a TDA in order to operate this type of service, however, we would like to emphasise that we do not see this as a long-term solution and are working in collaboration with the CAA to support the development of integrated airspace that allows equitable use for all airspace users. Our UAS operator intends to seek CAA guidance on compliantly deploying detect and avoid technology to remove the need for segregated airspace, in line with the Airspace Modernisation Strategy.

Our UAS operator conducts all operations below 600ft AGL, we will continue to evaluate the airspace requested for operations to ensure that the minimum airspace is being requested. All TDA ceilings should be reported and briefed as AMSL in accordance with ICAO Annex 11 2.30.2.

If you have any further questions or would like to schedule a meeting with either our healthcare or aviation team, please do not hesitate to contact us.

Kind regards

On Tue, 22 Aug 2023 at 20:33, [REDACTED] wrote:

Hi

I wish to respond to the consultation regarding Northumbria Stage 2 ACP 2023-015.

Area B

At present the East coastline under the base of the Newcastle CTA is a busy transit route for VFR GA traffic and also allows non-radio equipped aircraft to operate with relative freedom. Area B as good as removes this route and will force east coast traffic to seek a formal zone transit with Newcastle ATC. This is a poorly thought-out consequence, expecting increased numbers of GA aircraft to seek transits and clogging Newcastle's airspace and frequency. They are already short-staffed, have had a NOTAM to that effect for many months now and operating with reduced hours and closures. Nobody can seriously think that this is a safe way to go about business, or in the extreme have non-radio traffic tracking miles out to sea to avoid the airspace.

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In reality, your proposal only reduces safety for other users by shrinking the remaining airspace available. This only increases the risks by squeezing other users closer together in a less appropriate manner and you have not been able to demonstrate otherwise, or detail any mitigation measures including a DACS or show willingness to deactivate a TDA. An airspace grab for an area larger than Newcastle CTR is preposterous and wildly disproportionate for an unnecessary reason. I can only assume that it is a 'shot to nothing', using the logic that asking for the world, knowing that you won't get it, but might get something, must be the strategy being applied.

Brief research shows that in 2020, your original purpose was to transport Covid-19 samples, test-kits and PPE, while avoiding courier call-out waiting times, free-up NHS staff, reduce unnecessary physical contact and minimise the risk of secondary transmission of the virus. I think most reasonable people could see the benefits at a time of exceptional national crisis and airspace use was obviously at an absolute minimum. But it does not translate out of those extraordinary times.

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For these reasons, I object in the strongest terms.

Regards



The Northumbria Hang and Paragliding Club (NHPC) object in the strongest terms to the airspace changes proposed in ACP 2023-015.

The Tyne Valley and airspace to the north west of Newcastle TMA is heavily used by General Aviation providing free airspace routing north/south east/west of our region. The proposed danger areas will severely curtail foot launched gliding activity in the North East of England. Our members have for the last 35 years exercised the freedom to fly across the region in Class G airspace. As gliders, unlike many general aviation users, we cannot guarantee overflight of low-level exclusion zones. These proposed danger areas are effectively impassable barriers for our members precluding the freedom to overfly and land if necessary.

The proposed drone service utilises technology **incapable of autonomous avoidance** of other air users. As such this model is not a viable proposal for widespread future deployment and falls short of CAA proposals outlined in the UKs Airspace Modernisation Strategy (CAP2298). Our members are not against progress, approximately half have already taken advantage of the CAAs Electronic Conspicuity rebate scheme. However, the proposed airspace 'grab' displaces all other users whilst demonstrating no prospect of innovation to meet future needs.

It is the opinion of Northumbria Hang and Paragliding Club that this trial should be ceased until such a time as safe avoidance of other air users can be guaranteed.



[Redacted]

Re: [Airspace] Drone Trial Feedback

1 message

[Redacted]

8 September 2023 at 12:00

Dear [Redacted]

Thank you very much for responding with feedback to our proposal. We appreciate the time it has taken to read the material and the constructive feedback you have provided. We would be more than happy to meet and discuss this with you, but in the meantime, we have addressed your points below.

As previous air traffic controllers we have knowledge of and appreciate the restrictions you might face when flying, and getting a perspective from pilots who fly in the local area is extremely important. Your feedback will help us continue the airspace change process by taking into consideration the feedback we have received to develop a more refined airspace.

Our intention is to work with the local GA community and other airspace users, including any local airfields or airstrips, to explore the possibility of operations working alongside each other. We, like the CAA and aviation community, believe that being able to share the airspace is ultimately the best solution for all stakeholders and this is a step along that path. It is extremely challenging to gain data on GA operations, and proves why stakeholder engagement is an important part of the process. The feedback provided to date from the aviation community, specifically from those who fly in the local area, is extremely important and will support our review of the airspace request.

Current regulations mean that we are required to apply for a TDA in order to operate this type of service, however, we would like to emphasise that we do not see this as a long-term solution and are working in collaboration with the CAA to support the development of integrated airspace that allows equitable use for all airspace users. Our UAS operator intends to seek CAA guidance on compliantly deploying detect and avoid technology to remove the need for segregated airspace, in line with the Airspace Modernisation Strategy.

If you have any further questions or would like to schedule a meeting with either our healthcare or aviation team, please do not hesitate to contact us.

Kind regards

[Redacted signature]

On Tue, 22 Aug 2023 at 21:32, [Redacted] wrote:

Please find attached feedback prepared, after consultation, by one of our members an experienced commercial pilot.

[Redacted]

[Redacted]

Apologies for the format as my IT failed to populate your feedback form

Sent from [Outlook for Android](#)

Name	
Email	
Representing	
Address	

Feedback

AOPA is a national membership association representing general Aviation in the UK. This feedback is based on our guiding principles in respect of access to airspace and that of our members who have given us their views on this ACP.

AOPA recognises that there is a growing need to integrate BVLOS UAS operation into UK Airspace, but this must be achieved in a way that is safe and does not unnecessarily exclude existing airspace users. Any ACP sponsor must be able to demonstrate that they have effectively engaged with stakeholders and how they have taken such engagement into account, and continue to do so until a decision has been made on the proposals.

It is therefore, in our view, incumbent on any proposal to introduce Temporary danger Areas (TDAs) to demonstrate that they are safe, affect the minimum area of airspace for the minimum amount of time and that the sponsors provide an effective means of two way and real time communication with all airspace users and a reasonable means of access. Activation of NOTAMs do not provide the level of granularity that is needed in real time. We would like to see proposals for how airspace users can communicate directly with the UAS operations to confirm actual flight times and routes or to advise of their need to access the airspace. Perhaps this can be incorporated into the proposed DAAIS?

The airspace that is proposed to be included in TDAs appears to be around 5 nm in width laterally, which seems excessive given that any UAS should be following a very narrow route. While the UAS are likely to be operating at 600 ft agl, the upper limit of the proposed airspace varies from 1000 ft AMSL to 2300 AMSL.

We would wish to see options with the smallest necessary volume of affected airspace reserved for the UAS operations, should the proposal be accepted.

Your proposal includes "The UAS operator, Zipline, has a proprietary detect and avoid system that has been approved for integration with their Part 135 Operations in the USA by the Federal Aviation Authority (FAA)". What electronic conspicuity (EC) standards will the UAS aircraft be operating from day one? What EC systems on other aircraft will the UAS be able to receive, interpret and use for avoiding action?

It also includes "Simultaneously, Zipline intends to seek UK CAA guidance on compliantly deploying detect and avoid technology to remove the need for segregated airspace, in line with the Airspace Modernisation Strategy." Is there any plan to make the airspace a TMZ, or require other forms of EC as mandatory for other airspace users?

The ACP states "a Danger Area Crossing Service (DACS) will not be provided." What about a DACS for airspace users wishing to take off or land at sites within the TDA?

What is the proposed end date for this trial if approved?

TDA Sector B to the NE of Newcastle Airport would block the low-level coastal transit route when the TDA is active. Has this been recognised and how will this be addressed by the sponsors? Similarly, have the sponsors identified any potential choke points that may result and, if so, how will these be mitigated?



Re: [Airspace] ACP-2021-025 Engagement Feedback

1 message

8 September 2023 at 13:52

Dear [REDACTED]

Thank you very much for responding with feedback to our proposal. We appreciate the time it has taken to read the material and the constructive feedback you have provided. We would be more than happy to meet and discuss this with you, but in the meantime, we have addressed your points below.

As previous air traffic controllers we have knowledge of and appreciate the restrictions you might face when flying, and getting a perspective from a pilot who flies in the local area is extremely important. Your feedback will help us continue the airspace change process by taking into consideration the feedback we have received to develop a more refined airspace.

Current regulations mean that we are required to apply for a TDA, however, we would like to emphasise that we do not see this as a long-term solution and are working in collaboration with the CAA to support the development of integrated airspace that allows equitable use for all airspace users. The DAA capability that is not available for this trial due to current UK regulations, however our UAS operator intends to seek CAA guidance on compliantly deploying DAA technology to remove the need for segregated airspace, in line with the Airspace Modernisation Strategy.

CAP1616 outlines the airspace change process for a temporary, trial and permanent airspace change. As stated on page 94, a full airspace change process is required for a trial to be made permanent. This application is for a trial only. If a TMZ or EC mandatory Zone wanted to be introduced a new airspace change request would be required.

The UAS will be equipped with ADS-B in to provide the UAS operator with a picture of air traffic. Apian is being supported and guided by Newcastle International ATC regarding operations in close proximity to Newcastle Airport. We will continue to re-evaluate the DACS and DAAIS requirements based on feedback from the aviation community and refinement of the airspace. Your comments regarding the use of NOTAMS in a dynamic way is something we have started to discuss with the CAA already.

The proposed dates of operations for the trial are 12th February - 12th August 2024.

We are currently in Stage 1 of the airspace change process and are undertaking stakeholder engagement at this time. Stage 1 allows us the opportunity to gain feedback from the wider aviation stakeholders on our proposal. It is not until this stakeholder engagement has been completed that we are able to have a complete view of operations in the area. Following stakeholder engagement, we will review all the feedback and review our proposal stating how we have addressed concerns from stakeholders. These will be uploaded to the ACP as part of our application.

If you have any further questions or would like to schedule a meeting with either our healthcare or aviation team, please do not hesitate to contact us.

Kind regards

On Tue, 22 Aug 2023 at 16:04, [REDACTED] wrote:

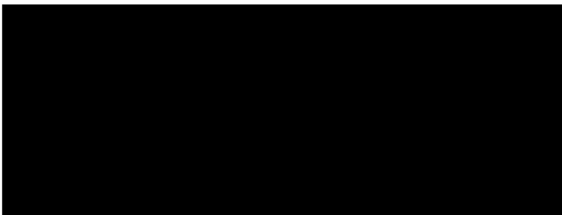
Please find attached feedback on ACP-2021-025.

Kind Regards



CONFIDENTIALITY NOTICE

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[Airspace] Objection to Proposed Airspace Change

1 message

24 August 2023 at 11:14

I have only learned of this proposal today. You have not sufficiently identified and contacted stakeholders. I am a pilot who operates in this airspace. I also own and operate an airfield, albeit outside the area of the proposed change.

I object to the ACP in the strongest terms as the TDA design completely fails to adhere to the CAA requirement to minimise impact on other air users. It closes two grass airstrips, blocks the busy East Coast VFR coastal transit route under the Newcastle CTA, creates choke points that will result in a large increase in traffic seeking Newcastle zone transits/Spadeadam D510 crossings and is unreasonable in its vertical planning, extending to around 1500ft AGL in the busy Tyne Valley transit route.

Area B

The East coastline under the base of the 1500ft Newcastle CTA is a busy transit route for VFR GA traffic and also allows non-radio traffic to move freely. Area B (SFC-1300ft) effectively blocks this route and will force east coast traffic to seek a formal zone transit with Newcastle ATC at a time when Newcastle ATC is short-staffed and operating with reduced hours. The only option for non-radio traffic will be to head 4 miles out to sea, significantly increasing risk for these air users who are traditionally historic aircraft or basic microlights.

Area C & D

When active, Area C closes the Hexham and Stanton airstrips that have operated for many years and are home to a variety of LAA, BMAA and historic aircraft.

The design uses a blunt approach of 600ft AGL above tallest known feature within the TDA, giving 1750ft AMSL in Area C and 2000ft AMSL in Area D. This results in much of the TDA being 1000ft-1500ft AGL rather than the desired/claimed 600ft AGL. The Tyne valley is a primary coast-to-coast transit route for both civil and military traffic in the North and the proposed 1750ft/2000ft TDA base will prevent 500ft-1000ft AGL valley transits when the cloud base is low. This will severely restrict GA coast-to-coast access. The minutes of the CAA assessment meeting dated 18/4/23 states "The Airspace Regulator (Technical) stated that due to the routing being over land that Apian should ensure they have included the appropriate airfields that are in close proximity and which may be affected. Apian Airspace Lead stated they **HAD TAKEN INTO ACCOUNT** these airfields to ensure minimal impact to other airspace users." I note the use of the past tense. How HAD Apian taken account of these concerns and what further have they done since then? Apian need to provide credible solutions in detail to the aviation community and not just make placatory statements to the CAA. The CAA must seek evidence to support claims made by Apian and not just accept them at face value.

DACS

Apian claim “Due to the heights of the proposed TDA complex (600 ft AGL above the tallest known feature), a Danger Area Crossing Service (DACS) will not be provided.”. A DACS would allow both Stanton and Hexham to operate whilst allowing the continued flow of the busy Coastal and Tyne Valley VFR transit routes which can achieve 1000ft AGL within the majority of the TDA. The onus should be on Apian to resolve rather than a disingenuous and misleading statement.

TDA Activation

During previous UAS operations on the Northumberland Coast, I didn't see any evidence that Apian cancelled TDA activation by fresh Notam when operations were suspended for weather or serviceability, often for days on end. Instead airspace remained blocked to other users despite it being unused for days. Apian should release airspace once it is clear operations will be suspended.

Summary

The extensive nature of this TDA will severely and negatively impact other air users in Northern England. I believe this trial only becomes viable when certified Detect and Avoid Technology is available enabling co-existence rather than implementation via a TDA. By progressing the TDA option, the wider flying community is being hugely restricted and put at significant risk which is totally unacceptable.



Re: [Airspace] Objection to Proposed Airspace Change

1 message

12 September 2023 at 10:48

Dear [REDACTED]

Thank you so much for your email, we appreciate you reaching out to us, identifying yourself as a stakeholder and sharing your feedback with us. Despite our best efforts to capture all stakeholders, we occasionally may miss some which is why stakeholder engagement is incredibly important.

We appreciate the time it has taken to read the material and the constructive feedback you have provided. We would be more than happy to meet and discuss this with you, but in the meantime, we have addressed your points below.

As previous air traffic controllers we have knowledge of and appreciate the restrictions you might face when flying, and getting a perspective from a pilot who flies in the local area is extremely important. Your feedback will help us continue the airspace change process by taking into consideration the feedback we have received to develop a more refined airspace.

Our intention is to work with the local GA community, including any local airfields or airstrips, to explore the possibility of operations working alongside each other. We, like the CAA and as I'm sure you do, believe that being able to share the airspace is ultimately the best solution for all stakeholders and this is a step along that path. It is extremely challenging to gain data on GA operations, and proves why stakeholder engagement is an important part of the process.

We have previously successfully demonstrated working in close proximity to microgliding and gliding clubs, and believe we could work with both Airstrips and the broader GA community to achieve the same in this trial. We are in contact with both Hexham and Stanton Airstrips, who continue to be extremely helpful in sharing information about their operations. We hope to work collaboratively with them to identify a solution where both operations can safely co-exist together, but will make adjustments to our request if we cannot.

Apian will share all redacted stakeholder engagement, including meetings, with the CAA, in line with the airspace change process.

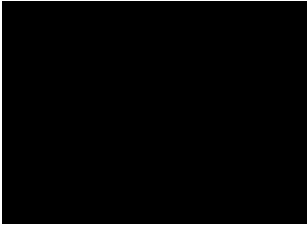
Apian is being supported and guided by Newcastle International Airport ATC regarding operations in close proximity to Newcastle Airport. We will continue to re-evaluate the DACS and DAAIS requirements based on feedback from the aviation community and refinement of the airspace.

Apian was founded by two NHS doctors, and all of our work is focused on providing improved healthcare to our patients and clinicians. We are working directly with the Northumbria Healthcare NHS Foundation Trust, to provide an on-demand delivery service in the most rural NHS Trust in England. The airspace proposed is directly linked to the use case requirements which are outlined in Annex B.

Current regulations mean that we are required to apply for a TDA in order to operate this type of service, however, we would like to emphasise that we do not see this as a long-term solution and are working in collaboration with the CAA to support the development of integrated airspace that allows equitable use for all airspace users. Our UAS operator intends to seek CAA guidance on compliantly deploying detect and avoid technology to remove the need for segregated airspace, in line with the Airspace Modernisation Strategy

Regarding NOTAMs in our previous trial, these were cancelled by the UAS operator directly when we did not anticipate flying. As per the NOTAM process, these were cancelled through the Airspace Regulation (Utilisation) Operations team at the CAA, who communicate them to the aviation industry. Cancellations of TDA usage were due to daily limitations (e.g. weather, medical deliveries complete) therefore cancellations were not seen in advance. This approach to TDA utilisation was taken to complete as many deliveries and capture as much data for the NHS as possible. We have already raised the concerns highlighted to us by stakeholders with the regulator and are finalising details with the CAA of an improvement process, however if you have suggestions to improve the safe sharing of this information, please let us know and we can discuss them with the CAA.

If you have any further questions or would like to schedule a meeting with either our healthcare or aviation team, please do not hesitate to contact us.



On Thu, 24 Aug 2023 at 11:14, <[REDACTED]> wrote:

Apian Northumbria NHS Air Grid

Airspace change ID: ACP-2023-015

I have only learned of this proposal today. You have not sufficiently identified and contacted stakeholders. I am a pilot who operates in this airspace. I also own and operate an airfield, albeit outside the area of the proposed change.

I object to the ACP in the strongest terms as the TDA design completely fails to adhere to the CAA requirement to minimise impact on other air users. It closes two grass airstrips, blocks the busy East Coast VFR coastal transit route under the Newcastle CTA, creates choke points that will result in a large increase in traffic seeking Newcastle zone transits/Spadeadam D510 crossings and is unreasonable in its vertical planning, extending to around 1500ft AGL in the busy Tyne Valley transit route.

Area B

The East coastline under the base of the 1500ft Newcastle CTA is a busy transit route for VFR GA traffic and also allows non-radio traffic to move freely. Area B (SFC-1300ft) effectively blocks this route and will force east coast traffic to seek a formal zone transit with Newcastle ATC at a time when Newcastle ATC is short-staffed and operating with reduced hours. The only option for non-radio traffic will be to head 4 miles out to sea, significantly increasing risk for these air users who are traditionally historic aircraft or basic microlights.

Area C & D

When active, Area C closes the Hexham and Stanton airstrips that have operated for many years and are home to a variety of LAA, BMAA and historic aircraft.

The design uses a blunt approach of 600ft AGL above tallest known feature within the TDA, giving 1750ft AMSL in Area C and 2000ft AMSL in Area D. This results in much of the TDA being 1000ft-1500ft AGL rather than the desired/claimed 600ft AGL. The Tyne valley is a primary coast-to-coast transit route for both civil and military traffic in the North and the proposed 1750ft/2000ft TDA base will prevent 500ft-1000ft AGL valley transits when the cloud base is low. This will severely restrict GA coast-to-coast access. The minutes of the CAA assessment meeting dated 18/4/23 states “The Airspace Regulator (Technical) stated that due to the routing being over land that Apian should ensure they have included the appropriate airfields that are in close proximity and which may be affected. Apian Airspace Lead stated they **HAD TAKEN INTO ACCOUNT** these airfields to ensure minimal impact to other airspace users.” I note the use of the past tense. How HAD Apian taken account of these concerns and what further have they done since then? Apian need to provide credible solutions in detail to the aviation community and not just make placatory statements to the CAA. The CAA must seek evidence to support claims made by Apian and not just accept them at face value.

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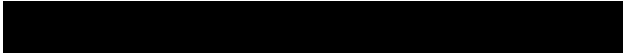
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Summary


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[Airspace] RE: ACP-2023-015 Apian Northumbria NHS Air Grid - Feedback event

1 message



Good morning 

Hope you are well?

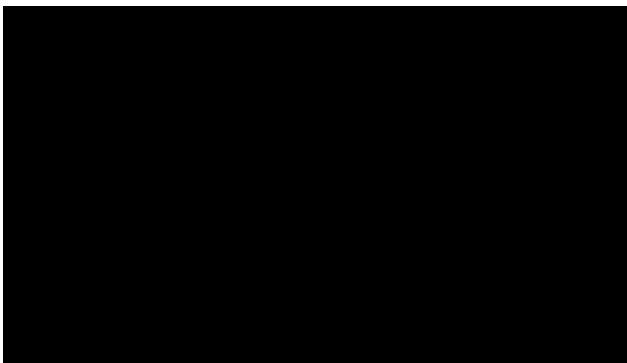
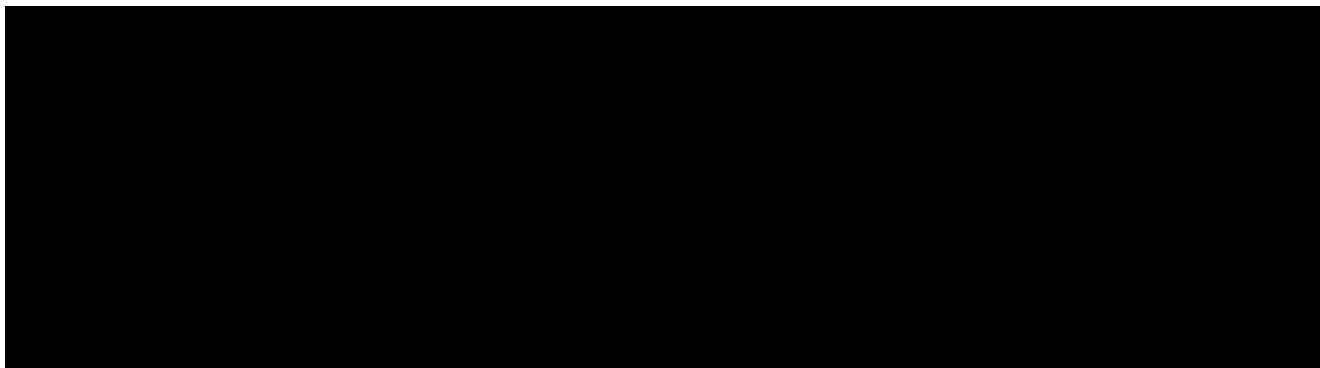
Can I ask a quick Q please regarding the flight frequency in Tables B-3 and B-4?

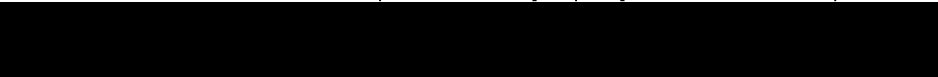
When it says 80 flights per day – is that likely to be every day in the trial period, as if so that means the TDA may be active most days for extended periods?

Do you have likely figures for the times and days that TDAs C, D and E will be active as they potentially have the biggest impact on mil low flying?

Hope that makes sense?

Regards





Dear Stakeholder,

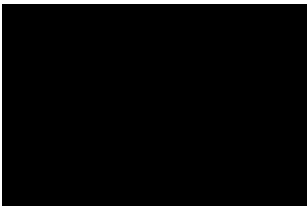
ACP-2023-015 Apian Northumbria NHS Air Grid - Feedback event

We are inviting members of the aviation community to a feedback session to be held at [Wansbeck Hospital](#) on 24th August 2023, 5-7pm. The purpose of this session is to discuss and gather feedback on the ACP-2023-015 airspace change process. Members of the aviation and healthcare teams at Apian, along with representatives from the NHS and the drone operator will be present to listen and answer questions where possible.

The event is free and open to all, but attendance must be confirmed in advance. Please email airspace@apian.aero to book a place by the end of Wednesday 23rd August.

If you are interested in the event but unable to attend then please email us anyway and we will inform you of the details of future events (virtual or in-person). Formal written responses to the airspace change process using the [form](#) are of course also very welcome, and we have received lots of useful and constructive feedback so far.

Thank you, and look forward to meeting you on the day.



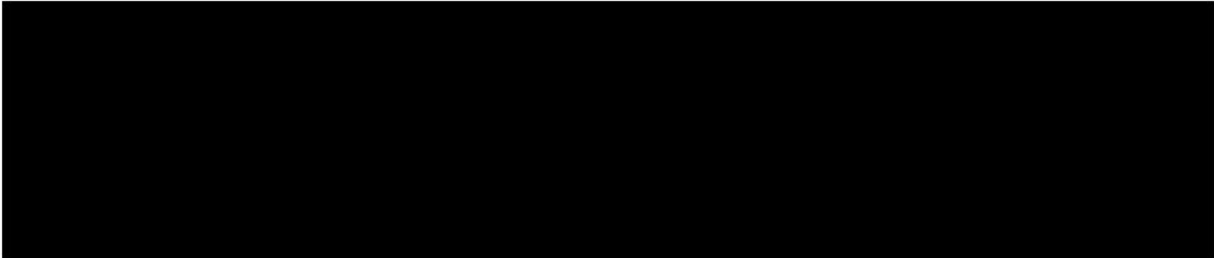


Fwd: ACP-2023-015 Apian Northumbria NHS Air Grid - Feedback event

1 message



30 August 2023 at 09:42



Hi

We would appreciate getting feedback on 24/7 for all the areas, as this will help us understand where/if adjustments and coordination are needed.

I would also say that we are looking at the heights as well as we know they are higher than we would like due to the terrain.

We visited RAF Spadeadam last week which was helpful. Speak to you later this afternoon.



On Fri, 25 Aug 2023 at 08:52, wrote:

Good morning

Hope you are well?

Can I ask a quick Q please regarding the flight frequency in Tables B-3 and B-4?

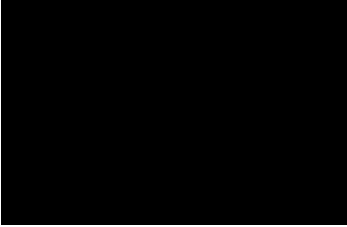
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Hope that makes sense?

Regards





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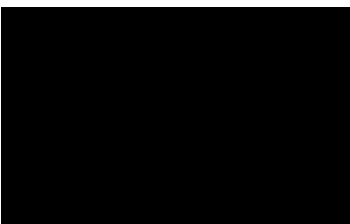
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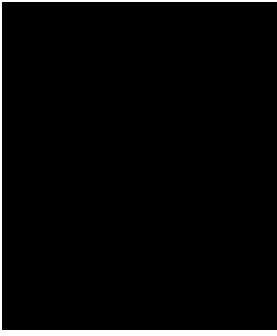
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Thank you, and look forward to meeting you on the day.



--
Kind Regards





[Airspace] BGA feedback - Trial Plan Northumbria Stage 2 ACP-2023-015

1 message

5 September 2023 at 10:49

Contact details below.

Representing the British Gliding Association.

Feedback

Thank you for engaging with the BGA. Please confirm receipt of this feedback.

The Stage 1 trial and associated ACP was carried out in an area that did not negatively impact access to airspace by gliding participants. The proposed Stage 2 airspace design would result in a negative impact on airspace access and operations by gliding and other recreational aviation airspace users.

Aviation safety regulation background

The UK recognises the need to modernise airspace in part to accommodate uncrewed air vehicles operating in unsegregated airspace. We note CAA policy (CAP2533) identifies how airspace integration with BVLOS in class G airspace is currently impossible because; 'given the size of many UA, other aircraft are highly unlikely to be able to visually acquire them in order to take effective avoiding action; that the technology is not yet sufficiently mature or widespread to allow the UAS to demonstrate a capability that is at least equivalent to the ability of a pilot of a manned aircraft to detect potential collisions and take such action as will best avert collision; and that the Rules of the Air are not yet adapted to accommodate the operation of UA, with UA being unable to comply with the extant Rules of the Air which form the foundation for the safe operation of aircraft in all classes of airspace'. This proposed ACP falls into the CAA's emerging policy concept segregation phase requiring a permanent or temporary danger area. The CAA publish policy for permanently established danger areas and temporary danger areas.

The need

We note that Zipline have a BVLOS uncrewed aviation solution that is used successfully in remote parts of the world. Zipline promotions highlight that they 'deliver anything from vaccines to lightbulbs to tonight's dinner'. Apian highlights that it is 'transforming healthcare logistics, bringing every-day on-demand delivery to the NHS and beyond'. Both companies are highly motivated to identify problems that could benefit from their solutions. UK Government-funded and other bodies are collaborating on NHS innovation projects. All of which leads to this ACP.

Issues that need addressing

The justification for the ACP is what it is. However, our role is to comment on the supplied detail of the ACP, within which there are several issues that if not addressed present a significant negative impact for other airspace users.

1. There is no MAC risk analysis provided as part of this ACP, including exported risk within airspace surrounding the proposed TDA complex.
2. The vertical cap of the proposed TDA is 600' above the highest point in any given part of the TDA complex. As the proposed TDA complex encompasses high terrain, the cap results in a disproportionately large volume of TDA airspace. Weather including cloud is a significant consideration, therefore it is most likely that the BVLOS

traffic will be transiting within valleys. The airspace cap needs to follow the terrain, ie a fixed height above the underlying ground.

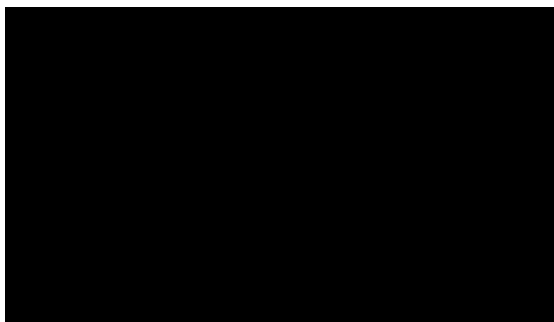
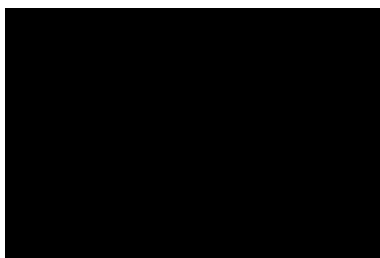
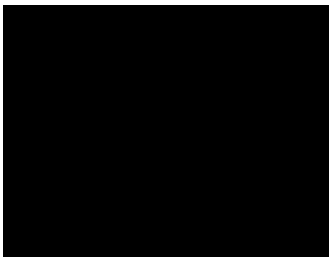
3. The east and west side of Newcastle airport's airspace is a popular transit route for aircraft wishing to remain clear of controlled airspace. As such, aircraft will now be squeezed into a tighter space than necessary, increasing the risk of collision with another aircraft. Military aircraft, light aircraft, microlights, and gliders all operate in this area. Weather conditions in this part of the UK mean that a higher than necessary cap on a TDA combined with a low cloud base further limits safe options for north/south transits.

4. Hexham and Stanton airfields lie within the TDA complex and as proposed would become inaccessible during TDA complex activity. The TDA will impact flying from Northumbria Gliding Club at Currock Hill.

5. The TDA design includes specific areas which will only be activated when flights are due to take place within those areas. Given the nature of the proposed activity, 24 hours notification by NOTAM is not appropriate. The proposer should establish a timely appropriate notification procedure. A Danger Area Activity Information Service (DAAIS) can only be contacted to obtain details of NOTAMs for the pilot to then decide how to proceed and therefore cannot provide the solution. A Danger Area Crossing Service (DACS) is required.

6. It is false to state that the proposed trial and associated proposed TDA complex does not impact traffic distribution below 7000 ft. Crewed traffic that could or does otherwise utilise the airspace is impacted as it will need to flow around or above the TDA complex.

Kind regards



Registered in England 422605



RE: [Airspace] BGA feedback - Trial Plan Northumbria Stage 2 ACP-2023-015

1 message

18 September 2023 at 21:05

Thanks for your response.

1. Noted, thanks. However, stage 4b is very late in the process and follows design. Hence the need for the sponsor to be aware at this stage.
2. I'm not sure our point has been understood. 600' above a 600' mountain is, essentially, 1200' above the nearby valley floor. The proposed method of selecting the max height of the design encompasses a disproportionately large volume of airspace.
3. Noted.
4. OK. But that's not clear in the consultation.
5. Noted.
6. Noted.

We look forward to ongoing engagement and consultation.

Kind regards

[Redacted]

Good afternoon [Redacted]

Thank you very much for responding with feedback to our proposal. We appreciate the time it has taken to read the material and the constructive feedback you have provided. We would be more than happy to meet and discuss this with you, but in the meantime, we have addressed your points below.

1. *There is no MAC risk analysis provided as part of this ACP, including exported risk within airspace surrounding the proposed TDA complex.*

We are currently in Stage 1 of the airspace change process, this allows us the opportunity to gain feedback from the wider aviation stakeholders on our proposal. Following stakeholder engagement, we will review all the feedback and reevaluate our proposal.

Stage 4b includes safety, operational and other assessments that may be required to support our submission. The stages for a trial airspace change can be found on the [CAA Airspace Change Portal](#) and details of what information needs to be provided can be found in [CAP1616](#),

2. *The vertical cap of the proposed TDA is 600' above the highest point in any given part of the TDA complex. As the proposed TDA complex encompasses high terrain, the cap results in a disproportionately large volume of TDA airspace. Weather including cloud is a significant consideration, therefore it is most likely that the BVLOS traffic will be transiting within valleys. The airspace cap needs to follow the terrain, i.e. a fixed height above the underlying ground.*

Our UAS operator conducts all operations below 600 ft AGL, we will continue to evaluate the airspace requested for operations to ensure that the minimum airspace is being requested. All TDA ceilings should be reported and briefed as AMSL in accordance

with ICAO Annex 11 2.30.2.

3. *The east and west side of Newcastle airport's airspace is a popular transit route for aircraft wishing to remain clear of controlled airspace. As such, aircraft will now be squeezed into a tighter space than necessary, increasing the risk of collision with another aircraft. Military aircraft, light aircraft, microlights, and gliders all operate in this area. Weather conditions in this part of the UK mean that a higher than necessary cap on a TDA combined with a low cloud base further limits safe options for north/south transits.*

We thank you for your feedback and sharing of regular routes, we will be reviewing the dimensions as a result of stakeholder feedback.

4. *Hexham and Stanton airfields lie within the TDA complex and as proposed would become inaccessible during TDA complex activity. The TDA will impact flying from Northumbria Gliding Club at Currock Hill.*

Our intention is to work with the local GA community, including any local airfields or airstrips, to explore the possibility of operations working alongside each other. We, like the CAA and as I'm sure you do, believe that being able to share the airspace is ultimately the best solution for all stakeholders and this is a step along that path. It is extremely challenging to gain data on GA operations, and proves why stakeholder engagement is an important part of the process.

We have previously successfully demonstrated working in close proximity to microgliding and gliding clubs, and believe we could work with both Airstrips and the broader GA community to achieve the same in this trial. We are in contact with both Hexham and Stanton Airstrips, who continue to be extremely helpful in sharing information about their operations. We hope to work collaboratively with them to identify a solution where both operations can safely co-exist together, but will make adjustments to our request if we cannot. We have also received feedback from Northumbria Gliding Club at Currock Hill and they have advised us of several routine routes.

5. *The TDA design includes specific areas which will only be activated when flights are due to take place within those areas. Given the nature of the proposed activity, 24 hours notification by NOTAM is not appropriate. The proposer should establish a timely appropriate notification procedure. A Danger Area Activity Information Service (DAAIS) can only be contacted to obtain details of NOTAMs for the pilot to then decide how to proceed and therefore cannot provide the solution. A Danger Area Crossing Service (DACS) is required.*

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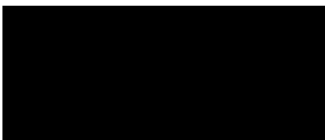
As per the NOTAM process, NOTAMs must be published 24hrs prior to activity. We will ensure NOTAMs are cancelled where appropriate in accordance with the flexible use of airspace policy. We have received feedback from other stakeholders regarding NOTAMs and have discussed these with the regulator. We are currently finalising details with the CAA to improve our access to the process, to allow us to cancel NOTAMs quickly. If you have suggestions to improve the safe sharing of this information, please let us know and we can discuss them with the CAA.

6. *It is false to state that the proposed trial and associated proposed TDA complex does not impact traffic distribution below 7000 ft. Crewed traffic that could or does otherwise utilise the airspace is impacted as it will need to flow around or above the TDA complex*

The 7000ft is in reference to commercial aircraft and the environmental considerations that we must make as part of the application. This trial will not impact the distribution of air traffic patterns into/out of Newcastle Aerodrome, and therefore will not alter any published arrival or departures routes. We are thankful for your feedback and will reword this section to ensure this is clear in future versions.

If you have any further questions or would like to schedule a meeting with either our healthcare or aviation team, please do not hesitate to contact us.

Kind regards



On Tue, 5 Sept 2023 at 10:49, [REDACTED] wrote:

Contact details below.

Representing the British Gliding Association.

Feedback

Thank you for engaging with the BGA. Please confirm receipt of this feedback.

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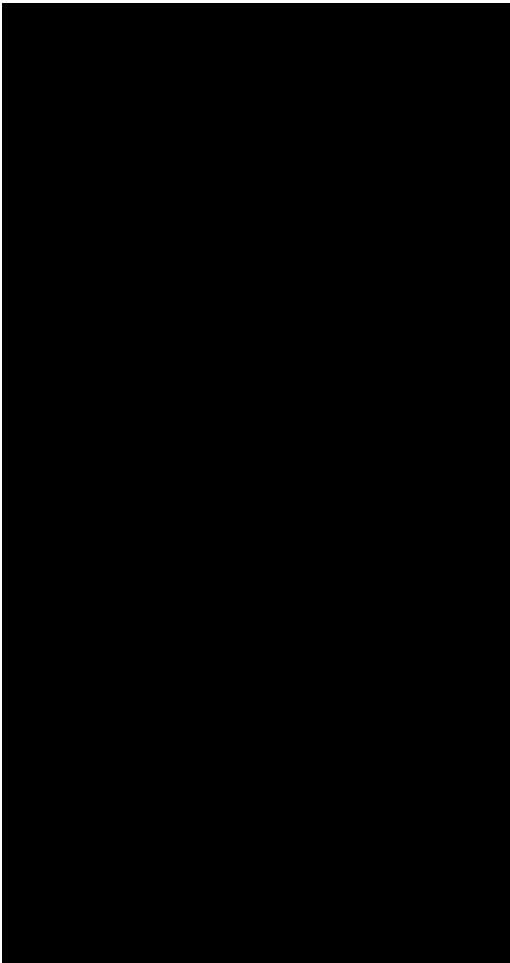
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Kind regards





Re: [Airspace] BGA feedback - Trial Plan Northumbria Stage 2 ACP-2023-015

1 message



20 September 2023 at 13:46

Good afternoon [redacted]
Thank you so much for your response.

1. Thank you for raising this, we are aware and are in contact with the regulator around the requirements for the submission. However I would just like to confirm, we will be adjusting our proposal following feedback from yourself and other stakeholders.

2. Thank you for highlighting. We will be revising the TDA dimensions based on the feedback we have received, this will reduce the heights, and we look forward to sharing with you in the future, for your feedback.

4. We take onboard your comments and will ensure this is made clear in all future engagement.

Once again, we would like to thank you for your feedback.



On Mon, 18 Sept 2023 at 21:05 [redacted] wrote:

Thanks for your response.

- 1. Noted, thanks. However, stage 4b is very late in the process and follows design. Hence the need for the sponsor to be aware at this stage.
- 2. I'm not sure our point has been understood. 600' above a 600' mountain is, essentially, 1200' above the nearby valley floor. The proposed method of selecting the max height of the design encompasses a disproportionately large volume of airspace.
- 3. Noted.
- 4. OK. But that's not clear in the consultation.
- 5. Noted.
- 6. Noted.

We look forward to ongoing engagement and consultation.

Kind regards



Good afternoon [redacted]

Thank you very much for responding with feedback to our proposal. We appreciate the time it has taken to read the material and the constructive feedback you have provided. We would be more than happy to meet and discuss this with you, but in the meantime, we have addressed your points below.

1. *There is no MAC risk analysis provided as part of this ACP, including exported risk within airspace surrounding the proposed TDA complex.*

We are currently in Stage 1 of the airspace change process, this allows us the opportunity to gain feedback from the wider aviation stakeholders on our proposal. Following stakeholder engagement, we will review all the feedback and reevaluate our proposal.

Stage 4b includes safety, operational and other assessments that may be required to support our submission. The stages for a trial airspace change can be found on the [CAA Airspace Change Portal](#) and details of what information needs to be provided can be found in [CAP1616](#),

2. *The vertical cap of the proposed TDA is 600' above the highest point in any given part of the TDA complex. As the proposed TDA complex encompasses high terrain, the cap results in a disproportionately large volume of TDA airspace. Weather including cloud is a significant consideration, therefore it is most likely that the BVLOS traffic will be transiting within valleys. The airspace cap needs to follow the terrain, i.e. a fixed height above the underlying ground.*

Our UAS operator conducts all operations below 600 ft AGL, we will continue to evaluate the airspace requested for operations to ensure that the minimum airspace is being requested. All TDA ceilings should be reported and briefed as AMSL in accordance with ICAO Annex 11 2.30.2.

3. *The east and west side of Newcastle airport's airspace is a popular transit route for aircraft wishing to remain clear of controlled airspace. As such, aircraft will now be squeezed into a tighter space than necessary, increasing the risk of collision with another aircraft. Military aircraft, light aircraft, microlights, and gliders all operate in this area. Weather conditions in this part of the UK mean that a higher than necessary cap on a TDA combined with a low cloud base further limits safe options for north/south transits.*

We thank you for your feedback and sharing of regular routes, we will be reviewing the dimensions as a result of stakeholder feedback.

4. *Hexham and Stanton airfields lie within the TDA complex and as proposed would become inaccessible during TDA complex activity. The TDA will impact flying from Northumbria Gliding Club at Currock Hill.*

Our intention is to work with the local GA community, including any local airfields or airstrips, to explore the possibility of operations working alongside each other. We, like the CAA and as I'm sure you do, believe that being able to share the airspace is ultimately the best solution for all stakeholders and this is a step along that path. It is extremely challenging to gain data on GA operations, and proves why stakeholder engagement is an important part of the process.

We have previously successfully demonstrated working in close proximity to microgliding and gliding clubs, and believe we could work with both Airstrips and the broader GA community to achieve the same in this trial. We are in contact with both Hexham and Stanton Airstrips, who continue to be extremely helpful in sharing information about their operations. We hope to work collaboratively with them to identify a solution where both operations can safely co-exist together, but will make adjustments to our request if we cannot. We have also received feedback from Northumbria Gliding Club at Currock Hill and they have advised us of several routine routes.

5. *The TDA design includes specific areas which will only be activated when flights are due to take place within those areas. Given the nature of the proposed activity, 24 hours notification by NOTAM is not appropriate. The proposer should establish a timely appropriate notification procedure. A Danger Area Activity Information Service (DAAIS) can only be contacted to obtain details of NOTAMs for the pilot to then decide how to proceed and therefore cannot provide the solution. A Danger Area Crossing Service (DACS) is required.*

Apian is being supported and guided by Newcastle International ATC regarding operations in close proximity to Newcastle Airport. We will continue to re-evaluate the DACS and DAAIS requirements based on feedback from the aviation community and refinement of the airspace.

As per the NOTAM process, NOTAMs must be published 24hrs prior to activity. We will ensure NOTAMs are cancelled where appropriate in accordance with the flexible use of airspace policy. We have received feedback from other stakeholders regarding NOTAMs and have discussed these with the regulator. We are currently finalising details with the CAA to improve our access to the process, to allow us to cancel NOTAMs quickly. If you have suggestions to improve the safe sharing of this information, please let us know and we can discuss them with the CAA.

6. *It is false to state that the proposed trial and associated proposed TDA complex does not impact traffic distribution below 7000 ft. Crewed traffic that could or does otherwise utilise the airspace is impacted as it will need to flow around or*

above the TDA complex

The 7000ft is in reference to commercial aircraft and the environmental considerations that we must make as part of the application. This trial will not impact the distribution of air traffic patterns into/out of Newcastle Aerodrome, and therefore will not alter any published arrival or departures routes. We are thankful for your feedback and will reword this section to ensure this is clear in future versions.

If you have any further questions or would like to schedule a meeting with either our healthcare or aviation team, please do not hesitate to contact us.

Kind regards



On Tue, 5 Sept 2023 at 10:49, [REDACTED] wrote:

Contact details below.

Representing the [REDACTED]

Feedback

Thank you for engaging with the BGA. Please confirm receipt of this feedback.

The Stage 1 trial and associated ACP was carried out in an area that did not negatively impact access to airspace by gliding participants. The proposed Stage 2 airspace design would result in a negative impact on airspace access and operations by gliding and other recreational aviation airspace users.

Aviation safety regulation background

The UK recognises the need to modernise airspace in part to accommodate uncrewed air vehicles operating in unsegregated airspace. We note CAA policy (CAP2533) identifies how airspace integration with BVLOS in class G airspace is currently impossible because; 'given the size of many UA, other aircraft are highly unlikely to be able to visually acquire them in order to take effective avoiding action; that the technology is not yet sufficiently mature or widespread to allow the UAS to demonstrate a capability that is at least equivalent to the ability of a pilot of a manned aircraft to detect potential collisions and take such action as will best avert collision; and that the Rules of the Air are not yet adapted to accommodate the operation of UA, with UA being unable to comply with the extant Rules of the Air which form the foundation for the safe operation of aircraft in all classes of airspace'. This proposed ACP falls into the CAA's emerging policy concept segregation phase requiring a permanent or temporary danger area. The CAA publish policy for permanently established danger areas and temporary danger areas.

The need

We note that Zipline have a BVLOS uncrewed aviation solution that is used successfully in remote parts of the world. Zipline promotions highlight that they 'deliver anything from vaccines to lightbulbs to tonight's dinner'. Apian highlights that it is 'transforming healthcare logistics, bringing every-day on-demand delivery to the NHS and beyond'. Both companies are highly motivated to identify problems that could benefit from their solutions.