

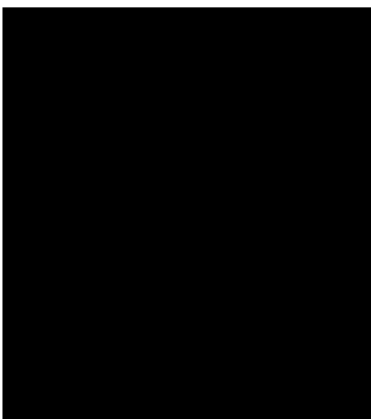
UK Government-funded and other bodies are collaborating on NHS innovation projects. All of which leads to this ACP.

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 14:53

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

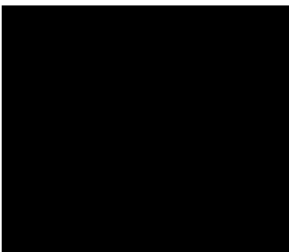
We note that Zipline have a BVLOS uncrewed aviation solution that is used successfully in remote parts of the world. Zipline promotions highlight that they 'deliver anything from vaccines to lightbulbs to tonight's dinner'. Apian highlights that it is 'transforming healthcare logistics, bringing every-day on-demand delivery to the NHS and beyond'. Both companies are highly motivated to identify problems that could benefit from their solutions. UK Government-funded and other bodies are collaborating on NHS innovation projects. All of which leads to this ACP.

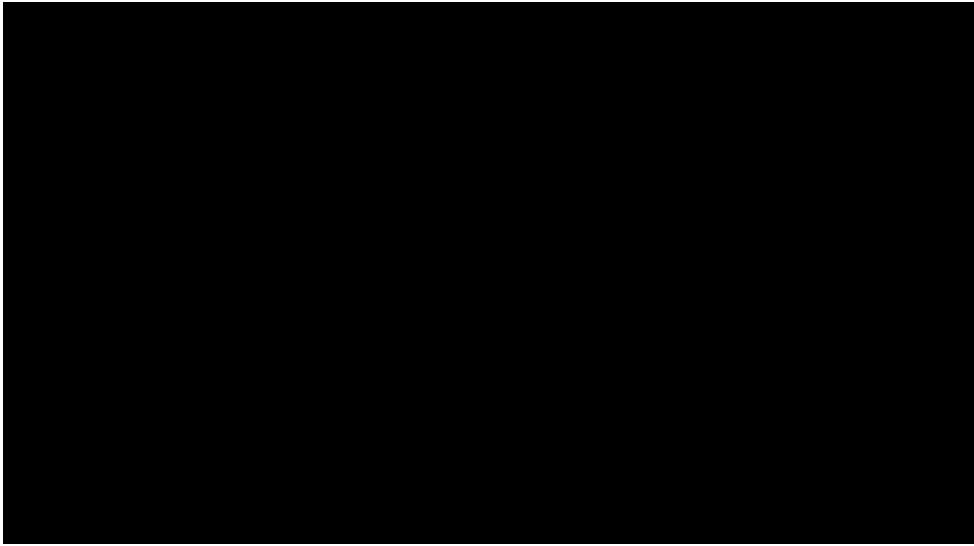
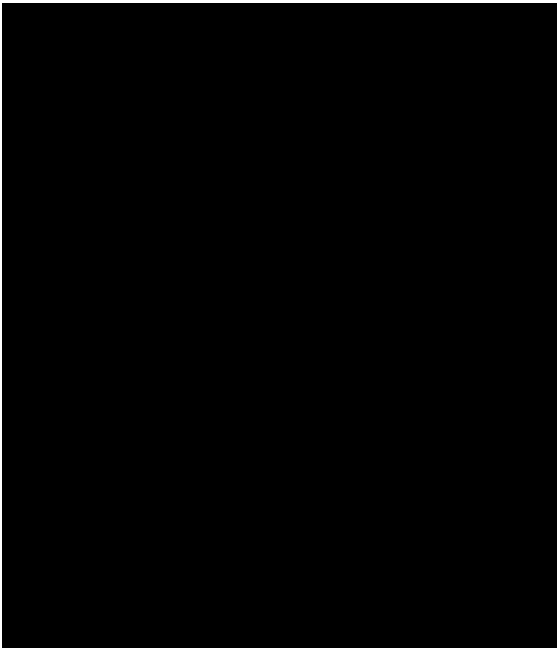
Issues that need addressing

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

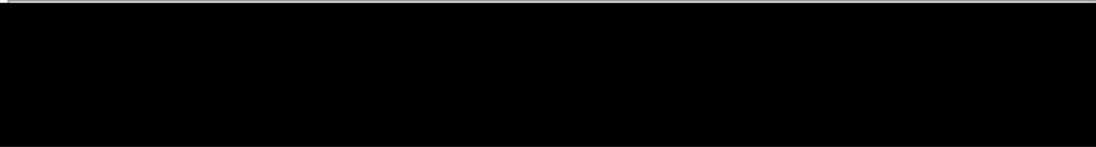






[Airspace] NHS Proposed TDA, EGGER UK Ltd Hexham Plant

1 message



1 September 2023 at 17:25

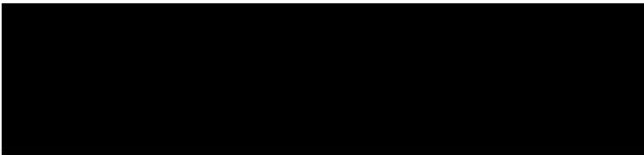
Good afternoon

My name is [REDACTED] and I represent EGGER (UK) Limited, a large wood processing plant in Hexham, Northumberland. We have fortunately been made aware this week of the proposed TDA via a third party, and I am writing to advise urgently that our business requires us to regularly operate in-house UAV's over our site at Hexham, as well as a storage site close by in Acomb Village. We are concerned to see that both operating areas fall into Area C of the Proposed TDA and feel that the proposal will impact negatively on our business if not addressed correctly.

We operate using VLOS at heights up to 400ft AGL potentially any time of week and year-round.

We will need our sites Geo- Fenced to be excluded from the Proposed TDA, .

I have marked our two sites as point A & B on the map below;

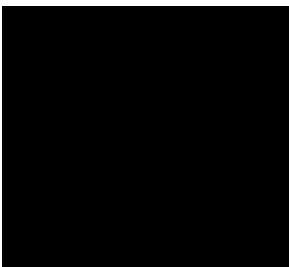




The Hexham Plant is a large site, with the exclusion zone roughly 32 - 35 hectares in area, see below.



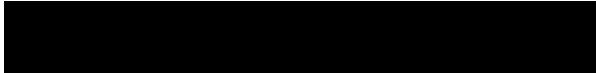
I look forward to hearing back from you and can be contacted either by email to this address or on the phone numbers shown below.





This e-mail and any attached files are for the attention of the named recipient only. It contains confidential material, which is the subject of copyright ownership by this company. If you have received this e-mail in error please immediately advise the sender and destroy the e-mail. Any dissemination, reproduction or use of the contents is unlawful and prohibited.

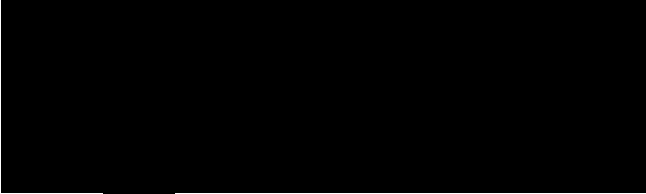
EGGER (UK) Limited (Company No. 02813369) and its subsidiaries Campact Limited (02258069) EGGER Forestry Limited (02819088) and Timberpak Limited (03905538), all of which are registered in England, have registered offices at at Anick Grange Road, Hexham, Northumberland, NE46 4JS.



Re: [Airspace] NHS Proposed TDA, EGGER UK Ltd Hexham Plant

1 message

13 September 2023 at 12:33



Dear

Thank you so much for your email, we appreciate you reaching out to us, identifying yourself as a stakeholder and sharing information around your operations. 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.

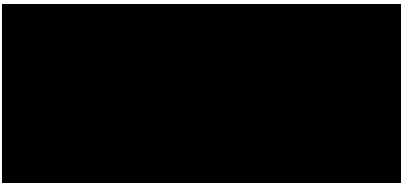
We are currently in Stage 1 of the airspace change process, this allows us the opportunity to gain feedback from the wider aviation stakeholders on our proposal. It is not until this stakeholder engagement has been completed that we are able to have a complete view of operations in the area. Following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

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.

The information you have shared is extremely helpful. Could you please confirm the boundaries of your operations around the two sites?

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, 1 Sept 2023 at 17:25, ' [Redacted] ' wrote:

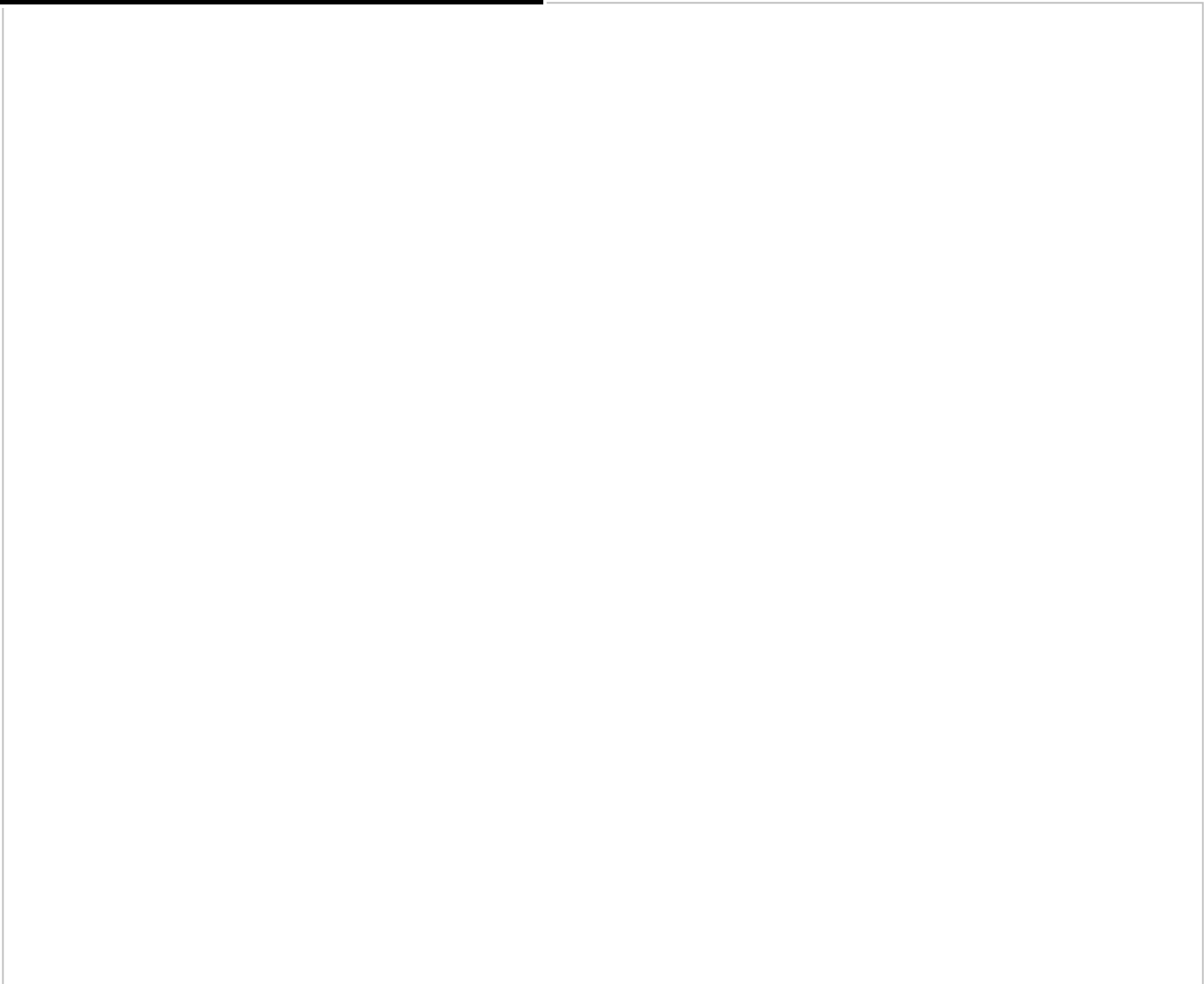
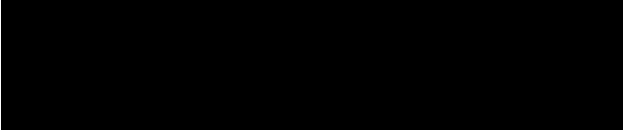
Good afternoon

My name is [Redacted], and I represent [Redacted] Limited, a large wood processing plant in Hexham, Northumberland. We have fortunately been made aware this week of the proposed TDA via a third party, and I am writing to advise urgently that our business requires us to regularly operate in-house UAV's over our site at Hexham, as well as a storage site close by in Acomb Village. We are concerned to see that both operating areas fall into Area C of the Proposed TDA and feel that the proposal will impact negatively on our business if not addressed correctly.

We operate using VLOS at heights up to 400ft AGL potentially any time of week and year-round.

We will need our sites Geo- Fenced to be excluded from the Proposed TDA, .

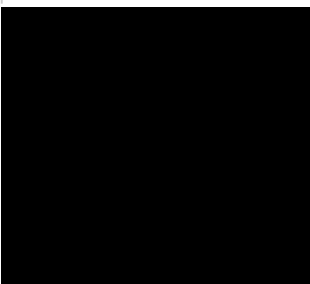
I have marked our two sites as point A & B on the map below;

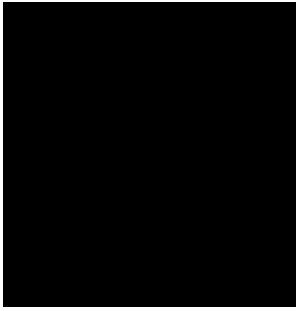


The Hexham Plant is a large site, with the exclusion zone roughly 32 - 35 hectares in area, see below.



I look forward to hearing back from you and can be contacted either by email to this address or on the phone numbers shown below.





This e-mail and any attached files are for the attention of the named recipient only. It contains confidential material, which is the subject of copyright ownership by this company. If you have received this e-mail in error please immediately advise the sender and destroy the e-mail. Any dissemination, reproduction or use of the contents is unlawful and prohibited.

EGGER (UK) Limited (Company No. 02813369) and its subsidiaries Campact Limited (02258069) EGGER Forestry Limited (02819088) and Timberpak Limited (03905538), all of which are registered in England, have registered offices at at Anick Grange Road, Hexham, Northumberland, NE46 4JS.

2 attachments



image001.png
977K

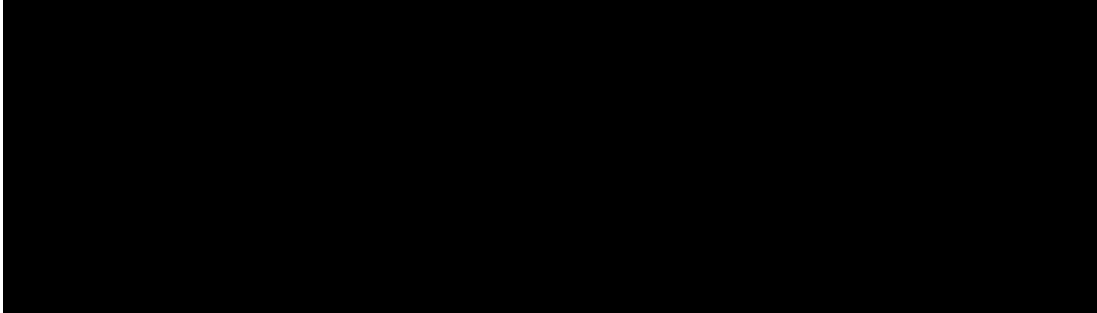


image003.png
1190K



Fwd: ACP-2023-015 Complaint

7 September 2023 at 09:40



Dear

Please see attached feedback which has been received by the CAA from GA pilot/airstrip operator relating to the Apian NHS Air Grid ACP.

Given that you are still in the process of engaging with stakeholders, I have informed the complainant that I have passed this on to you, and you will be in touch (email address

Regarding his comments please address his questions:

TDA Area B: why is the portion of airspace (below the Newcastle CTA Class D) necessary up to 1300ft amsl? There are no delivery sites here and as he points out this would block the coastal corridor and would force GA flights seeking to avoid the Newcastle Class D to fly 3nm further out to sea.

TDA Area C & D: Hexham and Stanton Airstrips are inside, but near the edge of the TDA; would it be possible to adapt the dimensions to avoid them?

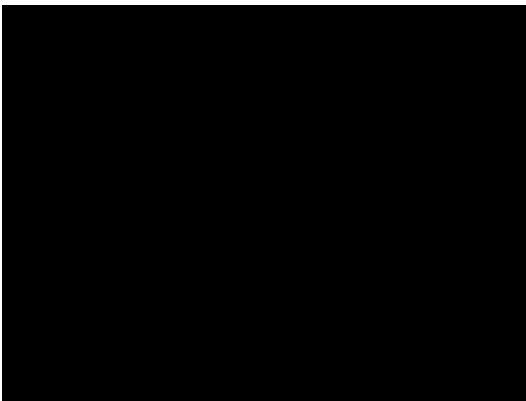
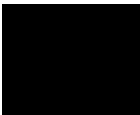
Also the comments regarding the ceiling of the TDA: could a more granular approach (dividing the area into smaller TDA sectors) be taken, thus significantly reducing the ceiling in some areas. This would also mitigate the request to have a DACS.

Cancellation of the TDA we have already discussed.

FYI the same points have been published in Flyer forums here:

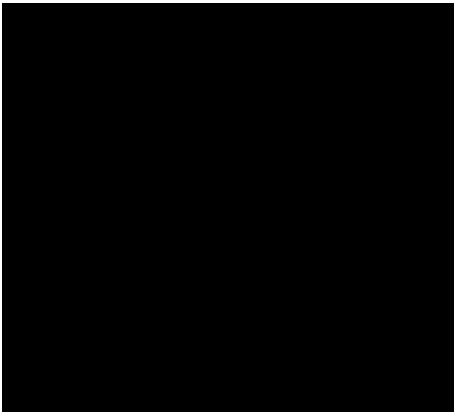
['Severe and negative impact' if Northumbria Danger Area goes ahead : : FLYER](#)

[Help with Feedback for of ACP-2023-015 - Newcastle Airspace Change Proposal - FLYER Forums](#)





Before Printing consider the environment. This e-mail and any attachment(s) are for authorised use by the intended recipient(s) only. It may contain proprietary material, confidential information and/or be subject to legal privilege. If you are not an intended recipient then please promptly delete this e-mail, as well as any associated attachment(s) and inform the sender. It should not be copied, disclosed to, retained or used by, any other party. Thank you. We cannot accept any liability for any loss or damage sustained as a result of software viruses. You must carry out such virus checking as is necessary before opening any attachment to this message. Please note that all e-mail messages sent to the Civil Aviation Authority are subject to monitoring / interception for lawful business.



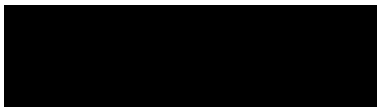
3 attachments



image001.png
350K



image001.png
350K





FCS 1521 - UK Airspace Report (excluding access issues or refusal of ATS)

Tracking Code: 2F5SGR8

TERMS OF USAGE

Browser Support:

This form will function correctly only if you are accessing it using a web-browser that is able to support JavaScript.

You will not be able to submit a form if your browser does not support JavaScript. Partial JavaScript support can also cause submission failure by blocking a critical form function, for instance, preventing a user from providing mandatory data. Please check your browser supports JavaScript before investing time in filling out this form.

Forms have been tested on a variety of different browsers. This application supports the following browsers (major versions, current and minus one): Chrome, Firefox, Safari and Internet Explorer. Your user experience will be enhanced if you use the latest version of your selected browser. If you have any issues completing the form, please let us know.

Use of Cookies:

This form uses cookies to allow the submission of the form. This is for the purpose of maintaining the connection between your computer and our servers. No personal information is stored in these cookies.

A cookie is used to maintain connection information between your computer and our servers as a part of completing the form. By accessing the form you are consenting to this cookie being used.

Data security and retention:

In filling this form in, you will be providing personal data to the CAA, which will be handled in accordance with the [CAA Data Protection Statement \(https://www.caa.co.uk/Our-work/About-us/General-privacy-notice/\)](https://www.caa.co.uk/Our-work/About-us/General-privacy-notice/).

Please be aware that technical staff working on behalf of the CAA may on an exceptional basis access user submitted data to provide support or to address technical issue associated with your form submission.

Form Use:

This form may be used to contact the CAA with your comments, concerns and enquiries about the use of UK airspace.

This includes specific cases of aerial advertising, aerial photography or surveying, aerobatics, air displays, aircraft operated by the emergency services, low flying aircraft, and aviation noise.

You can also use this form to contact the CAA about the use of UK airspace by specific UK airports. Please do not use this form if:

- You wish to contact the CAA about issues with airspace access or air traffic service refusals. Please use form [fcs1522](https://app.caa.co.uk/CAAPortal/form.htm?formCode=fcs1522) (<https://app.caa.co.uk/CAAPortal/form.htm?formCode=fcs1522>)
- you wish to complain about the CAA. Please go to www.caa.co.uk/complaints (<https://www.caa.co.uk/complaints>)
- you wish to report a possible breach of a navigation regulation. Please go to www.caa.co.uk/fcs1520 (<https://www.caa.co.uk/fcs1520>)
- you wish to report any information relating to military aircrafts use of UK airspace. This should be sent to the Ministry of Defence www.gov.uk/ow-flying-n-your-area/complaints (<http://www.gov.uk/ow-flying-n-your-area/complaints>)
- you wish to contact the CAA about the Airspace Change Process. Please go to airspacechange.caa.co.uk/contact-the-CAA/ (<https://airspacechange.caa.co.uk/contact-the-CAA/>)

Please be aware that technical staff working on behalf of the CAA may on an exceptional basis access user submitted data to provide support or to address technical issue associated with your form submission.

DATA NOTICE

It is important to the CAA that the information you have provided to us is brought to the attention of the organisation best placed to consider and take it into account. In some cases, that organisation will not be the CAA (for example, sometimes this will be the Department for Transport, an airport or an air traffic control provider). In such cases, the CAA may forward a copy of anything you have sent us to that third party.

Consent *

Further Information:

The CAA is not always the right organisation to take the information you have provided into account. Some examples of the situations where the CAA will forward it to a third party can be seen below:-

- For the example of issues with extra runway capacity in the South East of England your details and information may be forwarded to the Department for Transport. It is the Secretary of State's decision whether there is extra runway capacity built in the SE and, if so, where.
- For the example of queries regarding aviation noise and whether these should be concentrated or dispersed, this may also be forwarded to the Department for Transport. The current guidance from the Secretary of State to the CAA states that aircraft noise should be concentrated over as few people as possible. It is the Secretary of State's decision whether the policy in that guidance should be changed.
- For the example of noise and preferred routes at London Heathrow, London Gatwick and London Stansted this may be forwarded to the Department for Transport. The Secretary of State is responsible under the law for these routes and compliance with them. Trials of operational procedures by air navigation service providers or trials of changes to the airspace structure.
- For the example of organisations conducting trials, information is gathered because the organisation conducting the trial needs your information in order to assess the impact of the procedures or structure being trialed. Where the purpose of the trials is to try out changes to the airspace structure, your information is relevant to the impact of the changes being trialed and relevant to the organisation's decision on whether to seek permission from the CAA for a permanent change to a airspace structure. If the organisation conducting the trial does decide to seek a permanent airspace structure change, the CAA will require that organisation to provide information on the effect of the trial which will include your information submitted during the trial itself.
- For the example where an airport or an air traffic control provider, such as NATS, is consulting on a permanent airspace structure or change prior to deciding whether to submit a proposal to the CAA for a decision, then the information may be forwarded to the organisation conducting the consultation. Once the consultation has concluded, the organisation carrying out the consultation will decide whether to submit the airspace change proposal to the CAA. If the CAA does subsequently receive a request for a permanent airspace change, the CAA will want to take your information into account at that point.

The CAA will always log everything you send us. In some cases the CAA may not be able to take what you have sent us into account at the time you send it but in the future it may inform regulatory roles that the CAA will carry out.

YOUR DETAILS

Your Details

First Name *

Surname *

If you are submitting this form on behalf of an organisation, please enter the organisation's name

Town/City *

Post Code *

Contact Details

Email *

Have you contacted the CAA before? If so, then please provide the reference number

Have you contacted the Department for Transport or an air traffic control provider about these issues? If so, who?

PARTICULARS

Particulars of Information

Who/what is your report about? *

- Aircraft
- Airport
- Airspace Change

EVENT DETAILS

Event Details

Please confirm which Airspace Change Proposal you are contacting us about and provide further details below. *

ACP-2023-015
Ap an Northumbria NHS Air Ground
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, a base 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 minimize 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 coast line under the base of the 1500ft Newcastle CTA is a busy transit route for VFR GA traffic and also allows non-radar traffic to move freely. Area B (SFC-1300ft) effectively blocks this route and will force east coast traffic to seek a former zone transit with Newcastle ATC at a time when Newcastle ATC is short-staffed and operating with reduced hours. The only option for non-radar traffic will be to head 4 miles out to sea, significantly increasing risk for these air users who are traditionally historic aircraft or basic microflights.

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 the tallest known feature within the TDA, giving 1750ft AMSL in Area C and 2000ft AMSL in Area D. These results in much of the TDA being 1000ft-1500ft AGL rather than the desired/camed 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 (Technica) stated that due to the routing being overland and that Ap an should ensure they have included the appropriate airfields that are in close proximity and which may be affected. Ap an 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 Ap an taken account of these concerns and what further have they done since then? Ap an 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 Ap an and not just accept them at face value.

DACS

Ap an 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 Ap an to resolve rather than a disingenuous and misleading statement.

TDA Activation

During previous UAS operations on the Northumbria and Coast, I did not see any evidence that Ap an 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 being unused for days. Ap an should release airspace once test clearance 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 trajectory 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.

Date *

Time (UTC) *

2023-08-24

10

15

AM

Upload Additional Information or Pictures (Max 3 MB)

Upload File

SUBMISSION INSTRUCTIONS

Submission

Your form has been successfully submitted. Please keep a copy of this acknowledgement for your records.

Date and Time:

24 Aug 2023 11:12:29 AM

Application Submission Number:

fcs1521v2-21054

2023 © Civil Aviation Authority



[Airspace] ACP-2023-015 - Feedback Form



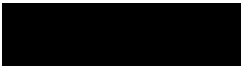
7 September 2023 at 10:42

Dear Sir or Madam,

I would be grateful if you would forward me a Feedback form in MS Word format for the proposed TDA submission (I could only find a PDF version on the CAA's Airspace Change Portal which I was unable to edit).

Many thanks,

Kind regards,






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

1 message

21 September 2023 at 09:39



Good morning

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 both Hexham and Stanton Airstrips, who continue to be extremely helpful in sharing information about their operations. We will make adjustments as a result of feedback we have received during the stakeholder engagement.

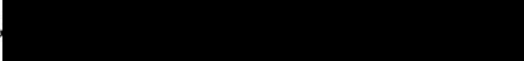
The UAS will be equipped with ADS-B in to provide the UAS operator with a picture of air traffic. We will continue to re-evaluate the DACS and DAAIS requirements based on feedback from the aviation community and refinement of the airspace.

We appreciate your feedback at this stage and will be reviewing the dimensions as a result of feedback we have received from yourselves and others. We look forward to sharing this with you in the near future.

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

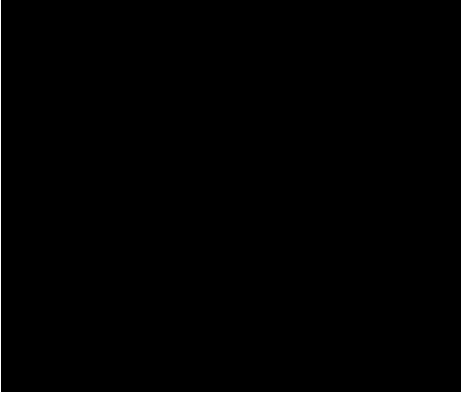


On Thu, 14 Sept 2023 at 13:38,  wrote:

Dear Sir or Madam,

Please see a attached.

Kind regards,





Re: [Airspace] ACP-2023-015

1 message

13 September 2023 at 12:47


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.

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.

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 thank you for your suggestions made, 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.

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, 8 Sept 2023 at 12:30, 

wrote:

Dear Sirs,

I am writing to object to the proposed TDA across Northumberland. I am a retired airline pilot and fly privately from Stanton air strip which the proposed TDA would be directly overhead and prohibit flight. I have nothing against innovation but the proposed TDA would affect alot of Northern aviators.. Looking at the map the low level costal route east of Newcastle area B would go upto 1300 ft amsl and Newcastle CTA starts at 1500 ft amsl. CAA CAP 1535p skyway code says when in proximity of notified airspace or danger areas one should fly 2 nm horizontally and 200 ft vertically from said airspace. Clearly that blocks off this option and as others have said transits through Newcastle CTZ may not always be possible. Looking to the west the top of the TDA is 1750 ft becoming 2000 ft blocking the low level Tyne valley route with Spadeadam Danger area to the North and high ground to the South restricting VFR traffic in the case of low cloud and making flight more hazardous. Emperor Hadrian built the Roman

wall from West to East in 0122 to keep the Northern natives out and your proposed TDA covers much of the same route and would have the same affect for Northern aviators. Prehaps the vertical extent of the TDA could be reduced by dividing it into more areas to reflect more accurately the maximun 600 ft above ground level and the Northern edge of area C could be moved 2 or 3 nm further South to allow Stanton to continue to operate.

Yours faithfully

A solid black rectangular box used to redact the sender's name and signature.



[Airspace] ACP-2023-015

8 September 2023 at 12:30

Dear Sirs,

I am writing to object to the proposed TDA across Northumberland. I am a retired airline pilot and fly privately from Stanton air strip which the proposed TDA would be directly overhead and prohibit flight. I have nothing against innovation but the proposed TDA would affect alot of Northern aviators.. Looking at the map the low level costal route east of Newcastle area B would go upto 1300 ft amsl and Newcastle CTA starts at 1500 ft amsl. CAA CAP 1535p skyway code says when in proximity of notified airspace or danger areas one should fly 2 nm horizontally and 200 ft vertically from said airspace. Clearly that blocks off this option and as others have said transits through Newcastle CTZ may not always be possible. Looking to the west the top of the TDA is 1750 ft becoming 2000 ft blocking the low level Tyne valley route with Spadeadam Danger area to the North and high ground to the South restricting VFR traffic in the case of low cloud and making flight more hazardous. Emperor Hadrian built the Roman wall from West to East in 0122 to keep the Northern natives out and your proposed TDA covers much of the same route and would have the same affect for Northern aviators. Prehaps the vertical extent of the TDA could be reduced by dividing it into more areas to reflect more accurately the maximun 600 ft above ground level and the Northern edge of area C could be moved 2 or 3 nm further South to allow Stanton to continue to operate.

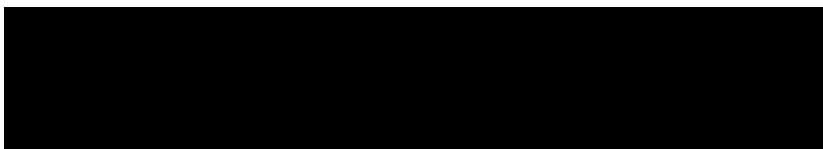
Yours faithfully



Louisa Smith <louisa@apian.aero>

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

1 September 2023 at 10:19

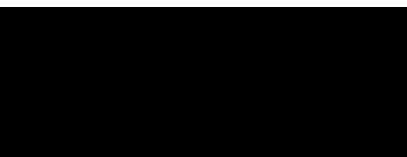


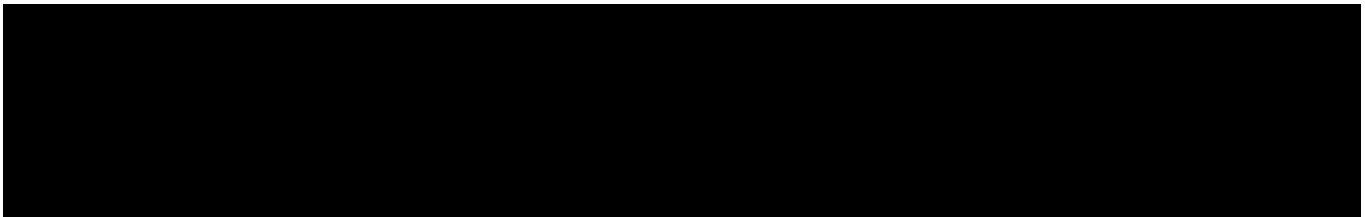
Hi,

This is the NATS NERL plc feedback on ACP-2023-015

Name	
Email	
Representing	
Address (including postcode if possible)	
Feedback: plc has carried out an impact assessment on the proposed ACP and concluded that it will have no impact on its operation.	

Regards





Your attachments have been security checked by Mimecast Attachment Protection. Details of potentially unsafe files have been attached.

Dear Stakeholder,

Request for support to ACP 2023 015 Northumbria Healthcare NHS Foundation Trust feasibility flight 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.

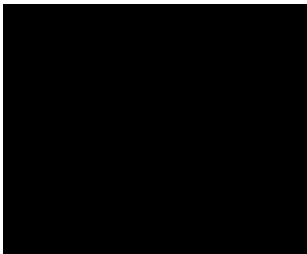
Apian, in conjunction with the Northumbria Healthcare NHS Foundation Trust, is looking to conduct feasibility flights using UAS between hospitals, GP surgeries, care homes and pharmacies. We would like to trial a regular, on-demand delivery service for the distribution of medical payloads such as, prescription 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:	



If you are not the intended recipient, please notify our Help Desk at Email Information.Solutions@nats.co.uk immediately. You should not copy or use this email or attachment(s) for any purpose nor disclose their contents to any other person.

NATS computer systems may be monitored and communications carried on them recorded, to secure the effective operation of the system.

Please note that neither NATS nor the sender accepts any responsibility for viruses or any losses caused as a result of viruses and it is your responsibility to scan or otherwise check this email and any attachments.

NATS means NATS (En Route) plc (company number: 4129273), NATS (Services) Ltd (company number 4129270), NATSNAV Ltd (company number: 4164590) or NATS Ltd (company number 3155567) or NATS Holdings Ltd (company number 4138218). All companies are registered in England and their registered office is at 4000 Parkway, Whiteley, Fareham, Hampshire, PO15 7FL.



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

1 message

8 September 2023 at 13:25



Thank you very much for your response and for supporting our ACP application.

Kind regards



On Fri, 1 Sept 2023 at 10:19, [Redacted] wrote:

Hi,

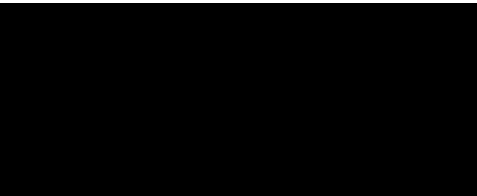
This is the [Redacted] feedback on ACP-2023-015

Name	
Email	
Representing	
Address (including postcode if possible)	

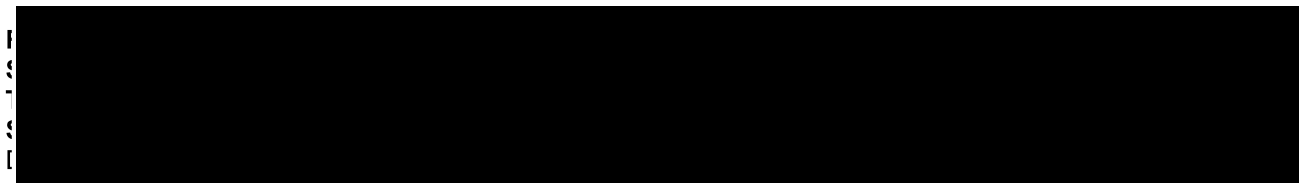
Feedback:

NATS NERL plc has carried out an impact assessment on the proposed ACP and concluded that it will have no impact on its operation.

Regards



FacebookStoneBlue71x71px-01 LinkedInStoneBlue71x71px-01 InstagramStoneBlue71x71px-01



Your attachments have been security checked by Mimecast Attachment Protection. Details of potentially unsafe files have been attached.

Dear Stakeholder,

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

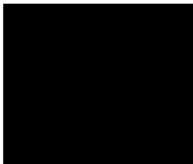
I am writing to you on behalf of Apian, a medical logistics startup founded by NHS doctors with support from the NHS Clinical Entrepreneur Programme. We work on behalf of the NHS to operationalise uncrewed air system (UAS) technology and research its impact on patient health outcomes and staff wellbeing.

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.



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:	

[Redacted]

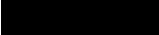
[Redacted]

[Redacted]

[Redacted]



NHS/Apian Drone Trials Stage 2 ACP-2023-015

Following the meeting at Wansbeck Hospital on 24th August 2023 attended by our Club Secretary  am pleased to submit the following feedback on behalf of the members of our Flying Club.

Background Information

We are located at the coast between Blyth and Seaton Sluice. We have been established for almost 50 years at this site which is public recreational land managed by Northumberland County Council. We have a Licence Agreement with NCC which allows us to fly on all days of the year from 7am until 10pm. We are affiliated to the BMFA which is our governing body and it is they who provide third party insurance for our members. The Club currently has 84 members.

Our site is inside Newcastle Airport category D airspace and we used to have a Letter of Agreement with Newcastle ATSU. Following the introduction of new airspace classifications, in particular FRZ's, discussion between ATSU, CAA, the BMFA and ourselves resulted in ATSU taking the decision in 2019 that a Letter of Agreement was no longer required.

We fly fixed wing aircraft, helicopters and quadcopters using mainly 2.4GHz radio equipment with occasional use of 35MHz gear.

Our Formal Request

That we have permission to continue our activities exactly as we do now, in compliance with our Club Rules and the BMFA Article-16, whilst your TDA area A is active.

To achieve this we suggest the following:-

1. A 500m diameter circular exclusion zone for Apian/Zipline BVLOS UAS be established with its centre point being the middle of our runway. Using Google Earth the centre point coordinates are 55deg 06' 01" North, 1deg 30' 20" West. Elevation 9M.
2. That the Apian/Zipline flying BVLOS restriction has the appropriate NOTAM established for the duration of the 6 months trial.

We will review and amend our risk assessments as appropriate.

If as a result of this trial there is an ongoing need for our location to be in airspace classed as a danger area we would apply for a permanent exclusion zone as detailed above.

Yours faithfully





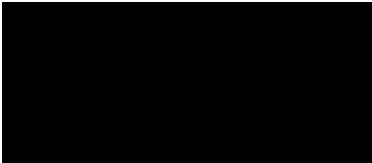
Re: [Airspace] Apian Feedback Event - Wansbeck Hospital



25 September 2023 at 13:56

On Tue, 5 Sept 2023 at 12:02, [Redacted] wrote:

We have been in touch with Cramlington Model Flying Club and they say you have been in contact with them asking questions on their daily activity's.
We haven't had any requests from you.
Can you please reply with what you require from us so we can continue our daily activity's.





Re: [Airspace] Apian Feedback Event - Wansbeck Hospital

1 message



11 September 2023 at 11:51

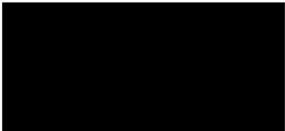
Good morning [redacted]
Thank you so much for this feedback. This is extremely helpful.
We will be in contact if we have any further questions, but in the meantime if you have any questions or further comments do not hesitate to contact us.

Kind regards
[redacted]

On Fri, 8 Sept 2023 at 22:31, [redacted]

To [redacted]

Please find in the attached document our reply to your questions from below email.



On Tuesday, 5 September 2023 at 14:01:29 BST, [redacted] wrote:

Hi [redacted]
Thank you for your email.
We met Cramlington Model Flying Club at our feedback event we ran in Northumbria, hence us getting the information earlier than we expected. We are still collating aviation stakeholder feedback, and I had it in my calendar to contact you this week, so thank you for the prompt.

- It would be great if you could send through the following information;
- Operating area (If you are able to share with us a map with the operating area outlined that would be greatly appreciated)
 - Operating heights
 - Operating times
 - High level overview of any agreements you have with Newcastle airport (if applicable)

Kind regards
[redacted]

On Tue, 5 Sept 2023 at 12:02, [redacted] wrote:
We have been in touch with [redacted] and they say you have been in contact with them asking questions on their daily activity's.
We haven't had any requests from you.
Can you please reply with what you require from us so we can continue our daily activity's.





[Airspace] RE: Apian Feedback Event - Wansbeck Hospital

1 message



11 September 2023 at 13:30

Hello there Airspace team.

I have attached a photo of a good article in this months (September 23)copy of microlight flying magazine regarding your proposed Northumberland tda's.

This article eloquently sums up my objections to the proposed tda's.

I am sure if you contact the bmaa team they will send you a copy of the magazine.

Yours faithfully



Sent from my Galaxy



Good morning,

We would like to say a really big thank you for attending our feedback event at Wansbeck Hospital last week, we appreciate the time you took out of your day to meet with us.

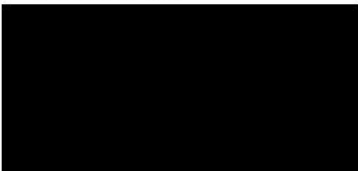
We found this discussion invaluable and the information you provided us with was extremely helpful. We will be collating notes from the discussion and will share these with you to ensure we have accurately captured your feedback. These will then be shared with the CAA and a redacted version uploaded to the ACP portal for record.

A few individuals mentioned that they would be able to provide more information about your specific flying operations and routes, if you are able to share that with us we would be very grateful.

If you know of any others who wanted to attend but were unable, please pass on our contact details and encourage them to contact us. We welcome the discussion with the aviation community.

Finally, please let us know if you have any further questions that have cropped up since, or you feel were not covered. If not, we will be in contact soon with the notes as mentioned above.

Kind regards



2 attachments



20230911_132038.jpg
8267K



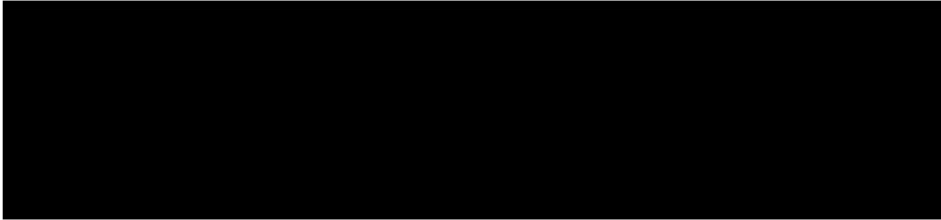
20230911_132053.jpg
8324K



Fwd: [Airspace] RE: Apian Feedback Event - Wansbeck Hospital

Apian Airspace <airspace@apian.aero>
Draft

25 September 2023 at 14:17



We appreciate you informing us of this article and sending through a photo. We will add this to your previous feedback.
Thank you.

Kind regards

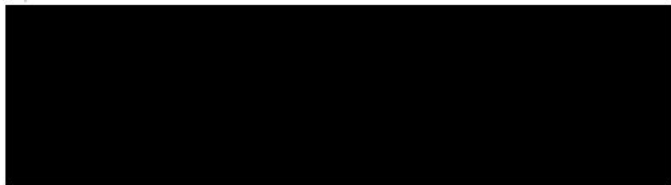


On Mon, 11 Sept 2023 at 13:31 [Redacted] wrote:

Hello there Airspace team.
I have attached a photo of a good article in this months (September 23)copy of microlight flying magazine regarding your proposed Northumberland tda's.
This article eloquently sums up my objections to the proposed tda's.
I am sure if you contact the bmaa team they will send you a copy of the magazine.
Yours faithfully



Sent from my Galaxy



Good morning,

We would like to say a really big thank you for attending our feedback event at Wansbeck Hospital last week, we appreciate the time you took out of your day to meet with us.

We found this discussion invaluable and the information you provided us with was extremely helpful. We will be collating notes from the discussion and will share these with you to ensure we have accurately captured your feedback. These will then be shared with the CAA and a redacted version uploaded to the ACP portal for record.

A few individuals mentioned that they would be able to provide more information about your specific flying operations and routes, if you are able to share that with us we would be very grateful.

If you know of any others who wanted to attend but were unable, please pass on our contact details and encourage them to contact us. We welcome the discussion with the aviation community.

Finally, please let us know if you have any further questions that have cropped up since, or you feel were not covered. If not, we will be in contact soon with the notes as mentioned above.

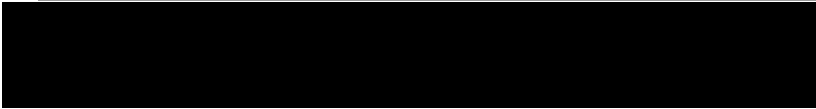
Kind regards





[Airspace] Apian Northumbria NHS Air Grid

1 message



12 September 2023 at 12:14

My comments on this proposal are below:



Feedback:

The huge block of airspace which would be segregated under this proposal will have a serious impact on other users of the airspace in this region, such as light aircraft, microlights, and hobbyist model/drone fliers such as myself.

The width and height of the proposed 'corridor' is enormous, and doesn't say much for the precision with which the drones will be flown - my own experience is that drones can be easily controlled to within a few metres both laterally and vertically, and if your drones cannot demonstrate similar precision then it begs the question whether they should be allowed to fly at all !

Through news media I am aware that the plan as it stands will effectively force the closure of at least two small airfields, severely curtail flying of microlights, model aircraft, and drones which operate up to 120m AGL

I feel that there are better and cheaper solutions to the requirement, and I think NHS resources would be better invested in other parts of the supply chain than throwing money at private companies messing around with drones

Regards





Re: [Airspace] Apian Northumbria NHS Air Grid

1 message

25 September 2023 at 15:09

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 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](#).

Our intention is to work with the local GA community, including any local airfields, airstrips or other drone operators, 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 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, and will be revising our TDA as a result of the feedback we have received.

The airspace that has been proposed takes into account multiple delivery sites, as well as ensuring there is suitable airspace that meets the requirements for UAS operators set out in CAP722A. This is not linked to the accuracy of the UAS. The UAS operator will require Operational Authorisation by the CAA in advance of commencing operations.

Apian is a healthcare company which was founded by two NHS doctors, and all of our work is focused on providing improved healthcare to our patients and clinicians. We will happily support 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.

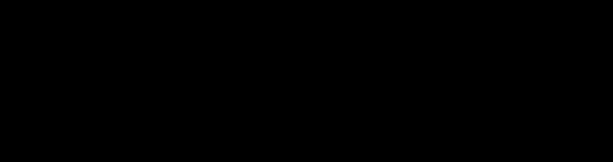
As a direct result of all the valuable and constructive feedback we have received, we will now undertake a period of review before communicating a revised TDA with stakeholders. We will include you in this communication and look forward to sharing this with you in the near future.

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, 12 Sept 2023 at 12:14, [REDACTED] wrote:

My comments on this proposal are below:



Feedback:

The huge block of airspace which would be segregated under this proposal will have a serious impact on other users of the airspace in this region, such as light aircraft, microlights, and hobbyist model/drone fliers such as myself.

The width and height of the proposed 'corridor' is enormous, and doesn't say much for the precision with which the drones will be flown - my own experience is that drones can be easily controlled to within a few metres both laterally and vertically, and if your drones cannot demonstrate similar precision then it begs the question whether they should be allowed to fly at all !

Through news media I am aware that the plan as it stands will effectively force the closure of at least two small airfields, severely curtail flying of microlights, model aircraft, and drones which operate up to 120m AGL

I feel that there are better and cheaper solutions to the requirement, and I think NHS resources would be better invested in other parts of the supply chain than throwing money at private companies messing around with drones

Regards





Re: [Airspace] Proposed TDA Northumberland

1 message

13 September 2023 at 12:57

Dear [REDACTED]

Apologies for the delay in response to your email, and thank you so much for getting in contact.

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.

Kind regards

On Thu, 7 Sept 2023 at 13:34, [REDACTED] wrote:

I wish to raise objections to this proposal.

I fly from Rufforth near York. We regularly fly up to Northumberland and beyond.

The TDA, in particular areas A and B, when activated would provide a considerable obstacle, requiring either coasting out to sea (unsafe) or putting extra pressure on Newcastle ATC (who are already having to close down for periods due to staff shortages) to seek approval for a zone transit. This transit is not, of course, guaranteed to be given.

Whilst you say that this restriction would be limited to 600 feet above ground level, realistically this restriction would extend to 2000 ft above sea level in some areas, due to high ground. In an area where low cloud is often a hazard to safe aviation, this would present real problems to aircraft in the area.

This is an ill thought out proposal that does not take into account the needs or safety of other airspace users.



Re: [Airspace] Proposed TDA Northumberland

1 message

25 September 2023 at 09:34

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 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 before conducting further engagement.

Our UAS operator conducts all operations below 600ft AGL. As a result of the feedback we have already received, we will be evaluating 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 will now undertake a period of review before communicating a revised TDA with stakeholders. We look forward to sharing this with you in the near future.

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, 7 Sept 2023 at 13:34 [REDACTED] wrote:

I wish to raise objections to this proposal.

I fly from Rufforth near York. We regularly fly up to Northumberland and beyond.

The TDA, in particular areas A and B, when activated would provide a considerable obstacle, requiring either coasting out to sea (unsafe) or putting extra pressure on Newcastle ATC (who are already having to close down for periods due to staff shortages) to seek approval for a zone transit. This transit is not, of course, guaranteed to be given.

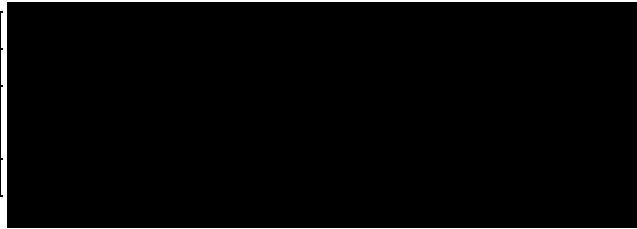
Whilst you say that this restriction would be limited to 600 feet above ground level, realistically this restriction would extend to 2000 ft above sea level in some areas, due to high ground. In an area where low cloud is often a hazard to safe aviation, this would present real problems to aircraft in the area.

This is an ill thought out proposal that does not take into account the needs or safety of other airspace users.

[REDACTED]

ACP-2023-015 Feedback

Name
Email
Representing
Address



Feedback

Item	Feedback
Trial Plan - Tabulated problems/ solutions – Item 1 Medical implants delivery	Elective surgery is, by definition, planned. As such, Northumbria Healthcare (the Trust), with its consistent “Outstanding” CQC rating, should be facing no issues delivering supplies in a timely manner. If the Trust cannot achieve this it is down to poor management. The use of UAVs and the creation of a Temporary Danger Area (TDA) for several months will not improve management skills within the Trust. If the Trust is facing issues of poor leadership and management, these should be addressed through improved staff selection and training, rather than through the imposition of a blanket TDA on other airspace users.
Trial Plan - Tabulated problems/ solutions – Item 2 Medical devices delivery	<p>The problem statement is simply a statement rather than a problem description. There is no articulation of an actual problem here. Apian is therefore requesting a Change of Airspace/ TDA to address a problem that it has not defined.</p> <p>The “problem” statement provided includes a hypothetical “if” statement, relating to low stocks or device faults resulting in clinicians “...spending valuable clinical time finding a replacement device.”</p> <p>The above situation simply demonstrates poor asset and supply chain management on the part of the Trust. Indeed, Addenbrookes hospital addressed this issue successfully several years ago without the use of UAVs and without implementing a change of airspace or the imposition of a TDA on other airspace users: <i>“It’s impossible to accurately audit over 30,000 medical devices without using RFID. When we previously carried out a test audit on six wards, it took us two weeks to complete and a staggering 35% of devices were unaccounted for. Now all our medical devices are fitted with a passive tag, the same process takes just 10-15 minutes and we can account for more than 90% of our inventory.”</i> (https://www.rfiddiscovery.com/en-us/inspiration/case-study-addenbrookes-hospital-0)</p>
Trial Plan - Tabulated problems/ solutions – Item 3 Primary distributor of products to Haltwhistle War Memorial Hospital	The problem refers to Haltwhistle War Memorial Hospital using out-of-hours taxis which incurs extra expense, while the use of UAS would provide a rapid just-in-time logistics solution. The proposed “solution”, which should fully address the problem, does not detail whether the proposed solution would cost less to the Trust than the out-of-hours taxi service referred to in the problem statement. A “problem” is therefore introduced, but not resolved by use of UAS or the implementation of the proposed TDA.

ACP-2023-015 Feedback

	<p>Further, item delivery by UAS does not, in this case, provide a just-in-time solution. When a patient presents at the healthcare facility, that patient will be triaged, and then seen by a clinician. Any medical equipment/ medicine needs can only be identified once the patient has been diagnosed. With the proposed solution, items will therefore be delivered after a delay. This is not just-in-time. A true just-in-time solution should have a required item arriving at its destination just as it is needed, not after a delay. The proposed Change of Airspace/ TDA will therefore not deliver a just-in-time service for the Trust and may actually introduce delays in the provision of patient care that would not have occurred had the required item been stocked at the hospital.</p>
<p>Trial Plan - Tabulated problems/ solutions – Item 4 Deliveries to the community (GPs, care homes and pharmacies)</p>	<p>The problem statement introduces the topic of immunization and a scenario in which a fridge at a GP surgery may fail. The use of UAS and implementation of the proposed TDA will not remove the need for GP practices to maintain medicines at certain temperatures. Critical refrigeration equipment should be fitted with alarms that send automatic alerts to nominated staff in the event of a temperature rise, to minimize risk of damage to contents. It should also be noted that local pharmacy networks also now actively participate in immunization programs, with pharmacy services often more accessible to patients than those offered by GP surgeries. This enlarged immunization network capability already significantly reduces any risk associated with loss of cooling in any one facility. Further, the NHS pays service providers for each vaccination administered; it is therefore already in the GP clinic or pharmacy's own business interest to manage risk effectively.</p> <p>The problem statement also refers to “anticipatory medications” and the issues that may be faced in delivering those medications to the patient when needed. If the Trust does not understand the actual meaning of anticipatory, and finds itself unable to adequately make provision for anticipated drug delivery, a change of airspace is not going to help it. Use of a UAS would, in this scenario, simply serve to reinforce poor supply chain management within the Trust. The Trust would be better served by implementing the latest version of the Supply Chain Operations Reference (SCOR) to improve its processes, before considering the deployment of UAS services which will, at this point, only mask its supply chain management shortcomings.</p>
<p>Summary</p>	<p>The application is speculative and, if granted, will only serve to mask poor leadership and management processes within the Trust. With the Trust apparently unable to grasp concepts as simple as “anticipatory medications” and “elective surgery”, and Apian unable to clearly articulate a problem, which calls into question whether a problem does actually exist..., and its lack of understanding of a just-in-time process, the Change of Airspace and imposition of the TDA will serve mainly to enable the Trust to make mistakes more efficiently.</p>
<p>Conclusion</p>	<p>Based on the above I oppose the proposed Change of Airspace/ TDA, and strongly recommend that Apian engages a competent consultant to work with the Trust, and all other stakeholders, in order to identify and evaluate real operational issues, identify and model the benefits of proposed solutions, and to support any future Change of Airspace application.</p> <p>Apian's application for Change of Airspace/ TDA should include comprehensive use case scenarios, showing the Trust's related costs, along with patient and</p>

ACP-2023-015 Feedback

	<p>environmental impact associated with current operations, along with detailed projected benefits to the Trust, its customers/ patients, and to the UK taxpayer, of its proposed solutions (including quantified healthcare, financial and environmental factors...). It should also clearly articulate how it proposes to mitigate the impact of its proposed operations on other airspace users, rather than how it expects to simply block other airspace users with a blanket TDA. In the absence of such a comprehensive submission, this application should be considered as little more than commercial speculation and should be denied.</p>
--	---



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

1 message

25 September 2023 at 14:56

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 feedback you have provided.

Apian is a healthcare company which was founded by two NHS doctors, and all of our work is focused on providing improved healthcare to our patients and clinicians. The feedback you have provided has been shared with our healthcare team. Our Medical Director 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.

Our work is looking to make improvements and innovate on the great services and support Northumbria NHS already has. We are always looking ahead to the challenges the NHS will face in the future and striving to provide better patient care, releasing staff time and deriving the benefits to the healthcare service. With the continued resource pressures the NHS faces, we believe that UAS can help to deliver improved healthcare for the Northumberland communities.

If you have any specific feedback about the airspace change request, please let us know.

Kind regards

[REDACTED]

On Tue, 12 Sept 2023 at 12:20, [REDACTED] wrote:

Please find attached feedback form ref: ACP-2023-015

Kind 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: As our flying site falls within your proposed area of activity you should be aware of our existence and that we operate radio-controlled model aircraft under an Article 16 Authorisation issued by the British Model Flying Association. This permits our members to operate models weighing up to 7.5Kg at heights up to 1500' AGL. We also operate models weighing between 7.5Kg and 25Kg and are in the process of obtaining a site permit to allow them to be flown to the same altitude rather than the present limit of 400' AGL. Given the remote location of our site we would not expect the TDA or your operations to impact us however the size and weight 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.


[REDACTED]



Re: [Airspace] Northumberland drone trails

1 message

21 September 2023 at 10:27

Good morning 

Thank you so much for your email.

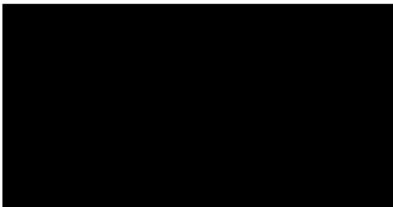
We want to assure you that if our proposal is approved, we have no intention to restrict your activities and would like to work collaboratively with you to ensure we have a suitable and safe solution in place that works for all. We have experience of working with other aviation operators, including local UA VLOS operators, to allow safe integration within the same airspace from 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 share with us more details of your operations. This ensures that we take into account your requirements when reviewing our proposal. Could you please share with us the location and area where you operate (an image with dimensions would be much appreciated at this stage).

We look forward to hearing from you,

Kind regards,

On Wed, 13 Sept 2023 at 05:54  wrote:

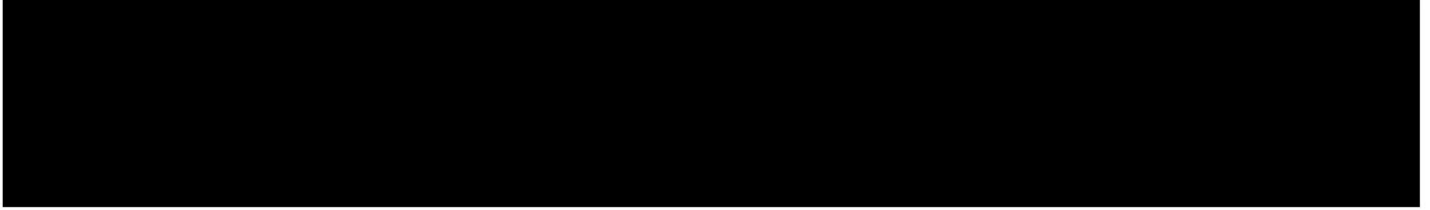
Please find attached feed back form from Northumberland model flyers





[Airspace] ID: ACP-2023-015

1 message



Please note that we currently operate from a grass strip North of Hexham, grid reference, NY 96261 68992

[Grid Reference Finder](#)

We fly potentially seven days a week, year round, in daylight hours.

We follow the CAA Article 16 Authorisation for model flyers.

I am concerned to see that your proposed transit routes appear to pass in close proximity to our flying field.

I would strongly suggest a minimum five hundred metre exclusion zone around our flying field (grid reference provided) in the interests of safety.

I would appreciate your feedback and I am happy to discuss the matter with you, my mobile number is given below.





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

1 message



Good afternoon [REDACTED]

Thank you so much for taking time out to talk to me about your operations. It was extremely helpful and ensures we take into account your requirements when reviewing our proposal. As I explained on the call, our TDA is currently being revised and we look forward to sharing our adjustments with you and other stakeholders in the near future.

As discussed with you, I would like to reassure 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 similar trials.

We will now undertake a period of review before communicating a revised TDA with stakeholders, which will also include updated timelines to allow suitable time for stakeholders to feedback.

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

Kind regards



Please note that we currently operate from a grass strip North of Hexham, grid reference, NY 96261 68992

[Grid Reference Finder](#)

We fly potentially seven days a week, year round, in daylight hours.

We follow the CAA Article 16 Authorisation for model flyers.

I am concerned to see that your proposed transit routes appear to pass in close proximity to our flying field.

I would strongly suggest a minimum five hundred metre exclusion zone around our flying field (grid reference provided) in the interests of safety.


I would appreciate your feedback and I am happy to discuss the matter with you, my mobile number is given below.



[Airspace] Trial Plan Northumbria ACP-2023-015

1 message

15 September 2023 at 09:43


Dear Sir,

I wish to object against this trial which in my view has been poorly thought out,

Very little thought has been put into the effect to the GA community which use this route to travel east to west and west to east esp VFR traffic,

In fact i am surprised you didnt add Carlisle airport and Kirkbride as Stake holder's,

We all rely on this route with the high ground to the South and Spadeadam to the North it is a very small corridor which allows air traffic to avoid the low weather,

Quite often if the the weather is bad in the West it allows us to travel South using the corridor East avoiding the high ground,

I know it will also cause difficulties pushing pilots out to sea on the east Coast around Newcastle

I feel this is going to put a lot of pilots in unnecessary conflict,

Without mentioning the effect of the small established airfields which will be adversely effected

Yours

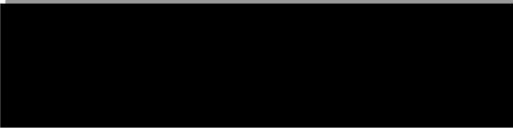


Sent from my Galaxy



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

1 message



25 September 2023 at 09:40

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.

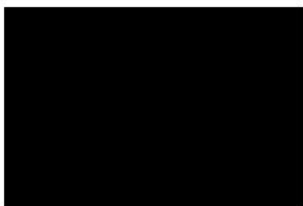
Our intention is to work with the local GA community, including any local airfields or airstrips, to explore the possibility of operations working alongside each other. We, like the CAA and as I'm sure you do, believe that being able to share the airspace is ultimately the best solution for all stakeholders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

Having reviewed our distribution list we can confirm that Carlisle Airport was included in the stakeholder engagement, we will ensure the table in annex C is updated to reflect this. We welcome your suggestion to contact Kirkbride and will include them in all future stakeholder engagement.

We will now undertake a period of review before communicating a revised TDA with stakeholders, which we look forward to sharing with you in the near future.

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 25/09/2023 at 09:43, [Redacted] via airspace [Redacted] wrote:



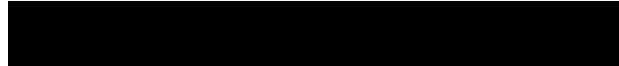
Dear Sir,
I wish to object against this trial which in my view has been poorly thought out, Very little thought has been put into the effect to the GA community which use this route to travel east to west and west to east esp VFR traffic,
In fact i am surprised you didnt add Carlisle airport and Kirkbride as Stake holder's,
We all rely on this route with the high ground to the South and Spadeadam to the North it is a very small corridor which allows air traffic to avoid the low weather,
Quite often if the the weather is bad in the West it allows us to travel South using the corridor East avoiding the high ground,

I know it will also cause difficulties pushing pilots out to sea on the east Coast around Newcastle
I feel this is going to put a lot of pilots in unnecessary conflict,
Without mentioning the effect of the small established airfields which will be adversely effected

Yours

A solid black rectangular redaction box covering the sender's name and any other identifying information in the signature.

Sent from my Galaxy



[Airspace] ACP 2023-015

1 message



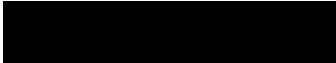
15 September 2023 at 13:20

I am concerned about your proposal to close of airspace in the Tyne Valley.

As one of the operators at Carlisle you're proposal to close off airspace in the Hexham area will effectively close off any aircraft transiting to the East Coast and return if the weather does not allow safe crossing over the high ground on this route.

At times the only safe route is by using the valley to stay in visual flying conditions.

Regards





Re: [Airspace] ACP 2023-015

1 message

25 September 2023 at 09:44

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 will now undertake a period of review before communicating a revised TDA with stakeholders, which we look forward to sharing with you in the near future.

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, 15 Sept 2023 at 13:21 [REDACTED] wrote:


I am concerned about your proposal to close of airspace in the Tyne Valley.

As one of the operators at Carlisle you're proposal to close off airspace in the Hexham area will effectively close off any aircraft transiting to the East Coast and return if the weather does not allow safe crossing over the high ground on this route.

At times the only safe route is by using the valley to stay in visual flying conditions.

Regards.

ACP2023-015 Stage 1 Feedback

Name		
Email		
Representing		
Address (including postcode if possible)		
Feedback:		
<p>CAP1616 Stage 1 sets out a clear requirement for a Statement of Need, along with clear Design Principles. We find that the ACP-2023-015 Trail Plan is silent on both the Statement of Need as well as Design Principles.</p> <p>The statement of need set out on DAP1616, submitted on 13 Mar 2023, appears to be a statement of desire but as there are existing medical delivery systems in place we view this as not a need.</p> <p>The lack of clear Design Principles makes the submission unclear in terms of as how the applicant intends to operate while maintaining aviation safety.</p> <p>It is also confusing as to what stage of CAP1616 process this submission is at; due to the title being “Trial Plan Northumbria Stage 2 ACP-2023-015”. A clearer delineation between CAP 1616 process and Apian plans would be simpler.</p> <p>Due to these reasons, NIAL are unable to support this application.</p>		



Re: [Airspace] ACP-2023-015 Stage 1 Feedback

1 message

26 September 2023 at 17:42

Dear [REDACTED]

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

[REDACTED] is considered an important and critical stakeholder for this trial and we appreciate your continued support and guidance your ATC team have provided to date.

We thank you for your feedback and suggestions and will be adjusting our documentation as a result of these. We agree that the trial plan format discussed with the CAA in advance of the start of the stakeholder engagement has added additional confusion, and have already shared this feedback with the CAA. We plan to separate the stakeholder engagement with the trial material moving forward.

As previously discussed with you, we will now undertake a period of review of the TDA following feedback from stakeholders that we have received. We anticipate this will reduce the footprint of the TDA and hence allow us to reduce the heights. Following these adjustments we will complete further stakeholder engagement. We will share these timelines with you and other stakeholders following approval by the CAA.

In our further engagement with stakeholders we will look to include clearer design principles as part of the documentation to ensure your feedback is addressed and allows others to see this detail.

The trial aims to augment existing ground transportation networks to enable clinicians and patients to reliably receive on-demand deliveries, whilst testing how this could improve cost savings, staff experience and health outcomes. The data that we are able to collect will help shape the service design and allow both the aviation and healthcare community to innovate and be the pioneers in this space.

Thank you once again for your continued support, and we look forward to continuing our partnership with you to help improve the healthcare within the Northumberland community.

Kind regards,

[REDACTED]

On Fri, 15 Sept 2023 at 15:30, [REDACTED] wrote:

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

Good Afternoon.

A copy of Newcastle International's feedback on ACP-2023-015 is attached.



DISCLAIMER:

The content of this email and any attachments may be privileged, confidential and protected by copyright. If you are not the intended recipient please notify the sender immediately and do not retain it nor copy it nor use it nor disclose it. Please note that neither Newcastle International Airport Ltd. nor the sender accept any responsibility for viruses and it is your responsibility to scan attachments (if any).



Name	[REDACTED]
Email	
Representing	
Address (including postcode if possible)	
<p>Feedback: I object strongly to your Drone Trial proposal for the following reasons. The proposed TDA effectively closes the lower airspace safe VFR route for light aircraft from Haltwhistle to the East coast. This will cause an unnecessary risk to life. Also the proposed TDA three NM miles out to sea and over land East of Newcastle Airport infringes safe commercial instrument approach and makes North/South VFR transit of the East coast impossible without risk to life or infringing controlled airspace. The proposed TDA effectively closes Stanton and Hexham Airfields for six months of the spring/summer weather and restricts flight from Athys Moor, Eshott, Causey Park and Currock Hill airfields with economic repercussions. North/South flight transit of Northumberland will be restricted to good weather only when flying VFR and will cause pilots to choose other less safe routes. In short the proposed TDA will cause VFR flight in the North of England/Borders to be less safe more stressful and with economic consequences. I would recommend postponement of the trial until the Drone can legally see and avoid therefore not requiring a TDA or a much reduced in width and height corridor for Drone flight.</p>	

3.9. Post engagement

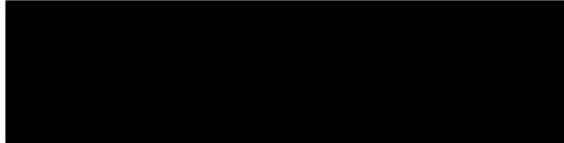
A copy of this material has been uploaded to the CAA Airspace Change Portal. Apian will produce an engagement summary report which will be presented to the CAA as part of the sponsor application. This will include details of how the engagement was conducted, all the feedback provided from the stakeholders 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] Drone Trial Response

1 message



25 September 2023 at 15:14

Good afternoon [redacted]
Hope you and [redacted] had a great weekend.

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.

Firstly, we would like to thank you for your continued engagement throughout this process. We have very much appreciated you sharing your experience of flying within the region. As discussed in our very first conversations with you before the stakeholder engagement period opened, we do not intend to close any airstrips or close local businesses. We apologise that this was not communicated better in the material published and have taken this as something we must do better in future.

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.

After many productive discussions with yourself, we feel we fully understand your concerns. We will now undertake a period of review before communicating a revised TDA with stakeholders, which we look forward to sharing with you in the near future.

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, 16 Sept 2023 at 10:05, [redacted] wrote:

Dear Apian,

Please find attached page twenty of your trial plan with my feedback response.

Best regards,



Sent from [Mail](#) for Windows



[Airspace] ACP 2023-015 Feedback

1 message

16 September 2023 at 10:22

Comment

As a GA flyer in the area (altho' not based there) and as a UK taxpayer (the trial is, I believe, UK-taxpayer funded) I have a keen interest in this proposal and have the following comments.

In my opinion this is one of the most ill-considered of the many ACPs for 'NHS' drones. For a start, the proposal is for a start-up company NOT the NHS and any support offered by the NHS is, I'm sure, provided on the basis that it costs the NHS nothing. IF this were an NHS trial it would be planned for ALL trusts not just those in the NE.

Having read the proposal it is difficult to see how it justifies yet another trial - and associated airspace grab. What is the significant difference between this trial and others that warrants such a large TDA? I can only conclude that it is proposed because funding is available rather than because it offers any significant benefit to the NHS.

The desire to provide an "on demand delivery service" strongly indicates that, once activated, the TDA will be active ALL the time, otherwise how can 'on demand' be met. In essence, then, this proposal is for a permanent DA for the duration of the trial.

In my view, it would be far more useful for ALL airspace users and the NHS if effort - inc any effort used for this trial - was dedicated to achieving an effective Detect and Avoid system for drones.

For GA flyers the proposal has several detrimental impacts and briefly they are:

- it blocks the N-S coastal route, forcing light a/c and microlights out to sea with significantly increased risk OR increases the demands for zone crossings at Newcastle for those that have radio and RT licences.

- it blocks the SW-NE transit route S of Spadeadam

- especially when cloud is low - as it often is in this part of the UK - as the TDA will extend to 1700-2000ft amsl

- it blocks operations at 2 x LA fields - Hexham and Stanton

It is interesting to note that Apain, while sponsor of the trail, is not the operator. That, I believe, increases the risks and I trust the CAA will examine that in its safety assessment.

All-in-all I can see no justification for this proposal, I can see detrimental impacts on both GA and Newcastle airport and I will NOT support it.

Please acknowledge receipt





Re: [Airspace] ACP 2023-015 Feedback

1 message

25 September 2023 at 17:43

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 is a healthcare company which was founded by two NHS doctors, and all of our work is focused on providing improved healthcare to our patients and clinicians. Apian is undertaking this work in close collaboration with Northumbria NHS Trust. We share your desire to see UAS trials benefit the NHS as a whole rather than a single Trust at a time but at this stage projects at such scale would be too disruptive to other airspace users. This trial aims to gather the data, and evidence whilst demonstrating how this service could provide impact to other Trusts. Our healthcare team 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.

Our work is looking to make improvements and innovate on the great services and support we currently have. We are always looking ahead to the challenges the NHS will face in the future and striving to be better, releasing staff time and identifying where the benefits are. With the continued resource pressures the NHS faces, we believe that UAS can help to deliver improved healthcare for the Northumberland communities.

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 will make adjustments as a result of feedback we have received during the stakeholder engagement.

We have received valuable information like yours, from the GA community regarding flying routes used frequently in Northumberland. As a direct result of this feedback, we will now undertake a period of review before communicating a revised TDA with stakeholders. We will include you in this communication and look forward to sharing this with you in the near future.

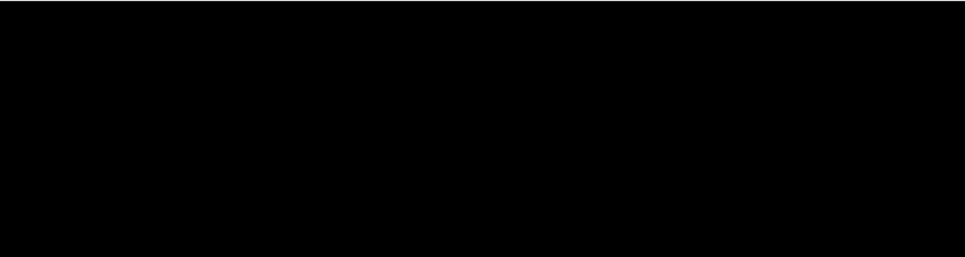
Current regulations mean that we are required to apply for a TDA in order to operate this type of service, however, we would like to emphasise that we do not see this as a long-term solution and are working in collaboration with the CAA to support the development of integrated airspace that allows equitable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

The change sponsor for an Airspace change does not need to be the UAS operator, however the change sponsor maintains responsibility for the ACP and the subsequent management of the TDA. As outlined in CAP1616.

As a result of the feedback we have received, we will now undertake a period of review before communicating a revised TDA with stakeholders for feedback. We look forward to sharing with you in the near future.

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,



Comment

As a GA flyer in the area (altho' not based there) and as a UK taxpayer (the trial is, I believe, UK-taxpayer funded) I have a keen interest in this proposal and have the following comments.

In my opinion this is one of the most ill-considered of the many ACPs for 'NHS' drones. For a start, the proposal is for a start-up company NOT the NHS and any support offered by the NHS is, I'm sure, provided on the basis that it costs the NHS nothing. IF this were an NHS trial it would be planned for ALL trusts not just those in the NE.

Having read the proposal it is difficult to see how it justifies yet another trial - and associated airspace grab. What is the significant difference between this trial and others that warrants such a large TDA? I can only conclude that it is proposed because funding is available rather than because it offers any significant benefit to the NHS.

The desire to provide an "on demand delivery service" strongly indicates that, once activated, the TDA will be active ALL the time, otherwise how can 'on demand' be met. In essence, then, this proposal is for a permanent DA for the duration of the trial.

In my view, it would be far more useful for ALL airspace users and the NHS if effort - inc any effort used for this trial - was dedicated to achieving an effective Detect and Avoid system for drones.

For GA flyers the proposal has several detrimental impacts and briefly they are:

- it blocks the N-S coastal route, forcing light a/c and microlights out to sea with significantly increased risk OR increases the demands for zone crossings at Newcastle for those that have radio and RT licences.

- it blocks the SW-NE transit route S of Spadeadam

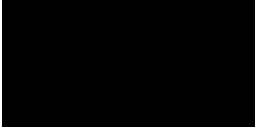
- especially when cloud is low - as it often is in this part of the UK - as the TDA will extend to 1700-2000ft amsl

- it blocks operations at 2 x LA fields - Hexham and Stanton

It is interesting to note that Apain, while sponsor of the trail, is not the operator. That, I believe, increases the risks and I trust the CAA will examine that in its safety assessment.

All-in-all I can see no justification for this proposal, I can see detrimental impacts on both GA and Newcastle airport and I will NOT support it.

Please acknowledge receipt



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:

Firstly, I wish to express disappointment that I only happened to find out about this by chance word of mouth. Why weren't we considered suitable to be on your stakeholder consultation list? To the best of my knowledge, nobody at Carlisle was, despite the obvious relevance to our operations.

We object in the strongest terms to the airspace change proposal.

It would totally exclude North Cumbrian VFR flights from the eastern side of the country when the cloud base is too low to cross the Pennines, other than via the Tyne valley, which is quite often. It will significantly reduce our ability to carry out training flights to Eshott, Newcastle and Teesside and customer's leisure flights to the many other airfields in the East of England. At best it would further squeeze the available airspace for existing, legitimate users. Degrading the safety of all other flights to allow yet another drone trial exclusive use of class G airspace. I note that almost all the sites planned to be used seem to be well served by existing primary road networks. I'm not sure what this (yet another UAV trial) will achieve, other than moving ~£800k of taxpayer money into Apian's bank account. What should be happening is work on technology to allow UAVs

to operate BVLOS without creating huge amounts of segregated airspace.



Re: [Airspace] ACP-2023-015 Feedback

1 message

25 September 2023 at 17:49



Dear [Redacted]

Thank you so much for your email, we appreciate you reaching out to us and identifying yourself as a stakeholder. 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.

Having reviewed our distribution list, we can confirm that Carlisle Airport was included in the stakeholder engagement and we will ensure the table in Annex C is updated to reflect this. We will also add you to all our future engagements.

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.

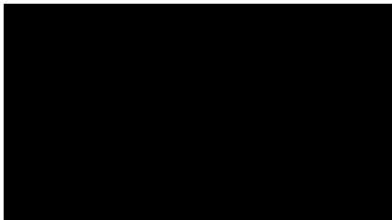
Current regulations mean that we are required to apply for a TDA, however, we would like to emphasise that we do not see this as a long term solution. We are working in collaboration with the CAA to support the development of integrated airspace that allows equitable use for all airspace users.

Apian is a healthcare company which was founded by two NHS doctors, and all of our work is focused on providing improved healthcare to our patients and clinicians. Apian is undertaking this work in close collaboration with Northumbria NHS Trust. Our healthcare team 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.

We will now undertake a period of review before communicating a revised TDA with stakeholders, which we look forward to sharing with you in the near future.

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, 16 Sept 2023 at 13:58, <[Redacted]>:



Re: [Airspace] Airspace restriction

1 message

26 September 2023 at 17:03

Thanks [REDACTED]

I would still like to see what must have been your proposal to Northumbria NHS Trust on why this trial is worthwhile? I can see the value of UAV delivery of prescriptions and test samples in areas of the world with poor conventional communication - but not Northumberland?

I sense I am receiving automated replies - a real reply with some attached and informative documentation would be much appreciated. I still have an open mind, but as a private pilot who will see my freedom to fly severely curtailed, I need some evidence to keep that mind open!

Regards

On 26 Sep 2023, at 09:58, [REDACTED] wrote:

Good morning [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 feedback you have provided.

Apian is a healthcare company which was founded by two NHS doctors, and all of our work is focused on providing improved healthcare to our patients and clinicians. Apian are undertaking this work in close collaboration with Northumbria NHS Trust. Our healthcare team 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.

Our work is looking to make improvements and innovate on the great services and support we currently have. We are always looking ahead to the challenges the NHS will face in the future and striving to be better, releasing staff time and identifying where the benefits are. With the continued resource pressures the NHS face, we believe that UAS can help to deliver improved healthcare for the Northumberland communities. This trial aims to use on-demand UAS delivery to trial and identify the impacts on the clinical service by augmenting the existing ground transportation networks.

We will now undertake a period of review before communicating a revised TDA with stakeholders, which we look forward to sharing with you in the near future.

If you have any specific feedback about the airspace change request or would like to schedule a meeting with either our healthcare or aviation team, please do not hesitate to contact us.

Kind regards,



v>

On Sat, 16 Sept 2023 at 14:04, [Redacted] wrote:

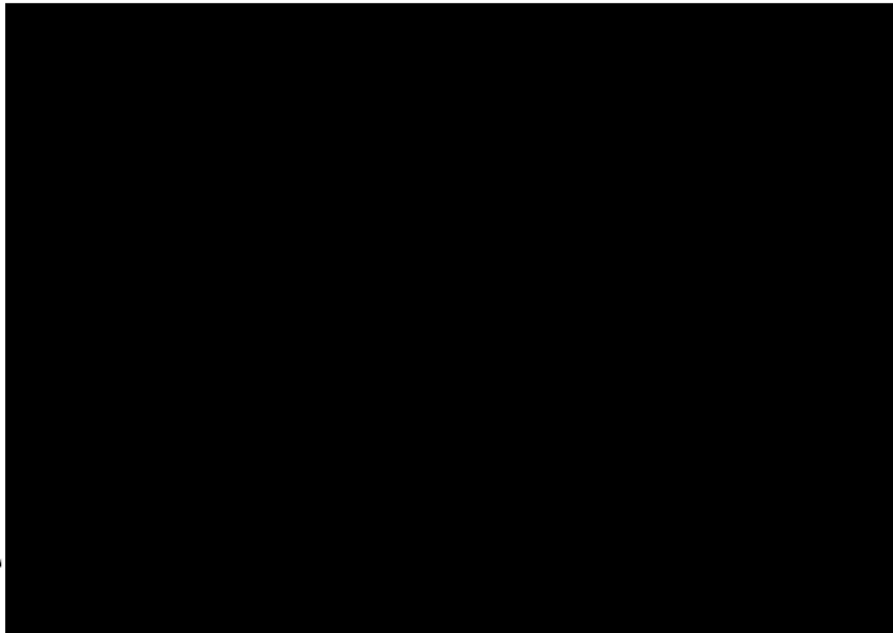
Dear [Redacted]

As a private pilot operating out of various small airstrips in Northumberland I have registered my objection to your plans on the CAA website.

However I have still to see any evidenced research on the actual value of the NHS of your proposed service. It takes about an hour to drive from my local surgery (Haltwhistle) to Cramlington Hospital, and at present medical deliveries are done at low cost by van or car. Your service would at best reduce that time by 30 minutes and yet I have seen no evidence that this will save lives or improve the health of local residents.

Perhaps you can outline to me what research has been undertaken to suggest this service is even necessary or cost effective?

Regards,



<



[Airspace] Airspace restriction

1 message



16 September 2023 at 14:04

Dear



As a private pilot operating out of various small airstrips in Northumberland I have registered my objection to your plans on the CAA website.

However I have still to see any evidenced research on the actual value of the NHS of your proposed service. It takes about an hour to drive from my local surgery (Haltwhistle) to Cramlington Hospital, and at present medical deliveries are done at low cost by van or car. Your service would at best reduce that time by 30 minutes and yet I have seen no evidence that this will save lives or improve the health of local residents.

Perhaps you can outline to me what research as been undertaken to suggest this service is even necessary or cost effective?

Regards,





Re: [Airspace] Airspace restriction

1 message

9 October 2023 at 15:51

Dear [REDACTED]

Thank you for your email. I can assure you that all feedback is responded to individually and is not automated. We are very appreciative of all the feedback we have received, especially as it has given us a better understanding of local flying routes and heights.

Apian and Northumbria NHS Trust have been researching and testing how UAVs could be safely integrated in the aviation and healthcare setting. This trial aims to demonstrate and measure the impact on care pathways, patient outcomes and staff wellbeing through using on-demand deliveries. Using a UAV service will help augment existing ground transportation networks by providing a more reliable, environmentally friendly and faster alternative to improve the resilience within Northumbria's logistics.

In addition, given the geography and rurality of the population within Northumbria's care, an on-demand delivery can enable products and services to be shared through a regionalisation model, which can improve access to healthcare by bringing care closer to patients' homes. This trial will include a variety of use cases to capture the data and impact that this service could provide to the wider healthcare service, whilst demonstrating the benefits from a clinical, operational and environmental standpoint.

If you would like a further follow-up with our healthcare team; we would be more than happy to facilitate a meeting.

Thank you.

[REDACTED]

On Tue, 26 Sept 2023 at 17:0 [REDACTED] wrote:

Thank [REDACTED]

I would still like to see what must have been your proposal to Northumbria NHS Trust on why this trial is worthwhile? I can see the value of UAV delivery of prescriptions and test samples in areas of the world with poor conventional communication - but not Northumberland?

I sense I am receiving automated replies - a real reply with some attached and informative documentation would be much appreciated. I still have an open mind, but as a private pilot who will see my freedom to fly severely curtailed, I need some evidence to keep that mind open!


Regards

[REDACTED]

[REDACTED]



On 26 Sep 2023, at 09:58,  wrote:

Good morning 

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

Apian is a healthcare company which was founded by two NHS doctors, and all of our work is focused on providing improved healthcare to our patients and clinicians. Apian are undertaking this work in close collaboration with Northumbria NHS Trust. Our healthcare team 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.

Our work is looking to make improvements and innovate on the great services and support we currently have. We are always looking ahead to the challenges the NHS will face in the future and striving to be better, releasing staff time and identifying where the benefits are. With the continued resource pressures the NHS face, we believe that UAS can help to deliver improved healthcare for the Northumberland communities. This trial aims to use on-demand UAS delivery to trial and identify the impacts on the clinical service by augmenting the existing ground transportation networks.


We will now undertake a period of review before communicating a revised TDA with stakeholders, which we look forward to sharing with you in the near future.

If you have any specific feedback about the airspace change request or would like to schedule a meeting with either our healthcare or aviation team, please do not hesitate to contact us.

Kind regards,



v>

On Sat, 16 Sept 2023 at 14:04,  wrote:

Dear 

As a private pilot operating out of various small airstrips in Northumberland I have registered my objection to your plans on the CAA website.

However I have still to see any evidenced research on the actual value of the NHS of your proposed service. It takes about an hour to drive from my local surgery (Haltwhistle) to Cramlington Hospital, and at present medical deliveries are done at low cost by van or car. Your service would at best reduce that time by 30 minutes and yet I have seen no evidence that this will save lives or improve the health of local residents.

Perhaps you can outline to me what research has been undertaken to suggest this service is even necessary or cost effective?

Regards,





Re: [Airspace] Airspace restriction

1 message

26 September 2023 at 09:58

Good morning [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 feedback you have provided.

Apian is a healthcare company which was founded by two NHS doctors, and all of our work is focused on providing improved healthcare to our patients and clinicians. Apian are undertaking this work in close collaboration with Northumbria NHS Trust. Our healthcare team 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.

Our work is looking to make improvements and innovate on the great services and support we currently have. We are always looking ahead to the challenges the NHS will face in the future and striving to be better, releasing staff time and identifying where the benefits are. With the continued resource pressures the NHS face, we believe that UAS can help to deliver improved healthcare for the Northumberland communities. This trial aims to use on-demand UAS delivery to trial and identify the impacts on the clinical service by augmenting the existing ground transportation networks.

We will now undertake a period of review before communicating a revised TDA with stakeholders, which we look forward to sharing with you in the near future.

If you have any specific feedback about the airspace change request or would like to schedule a meeting with either our healthcare or aviation team, please do not hesitate to contact us.

Kind regards,

v>

On Sat, 16 Sept 2023 at 14:04, [REDACTED] wrote:

Dear [REDACTED]

As a private pilot operating out of various small airstrips in Northumberland I have registered my objection to your plans on the CAA website.

However I have still to see any evidenced research on the actual value of the NHS of your proposed service. It takes about an hour to drive from my local surgery (Haltwhistle) to Cramlington Hospital, and at present medical deliveries are done at low cost by van or car. Your service would at best reduce that time by 30 minutes and yet I have seen no evidence that this will save lives or improve the health of local residents.

Perhaps you can outline to me what research has been undertaken to suggest this service is even necessary or cost effective?

Regards,

[Redacted]

[Redacted]

[Redacted]



[Airspace] Objection

1 message



16 September 2023 at 15:10

To whom it may concern

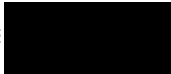
I'm writing to express my concerns to the proposed drone trials in airspace Inthe Newcastle areas etc

As a pilot flying out Carlisle Airport and have been flying down the East coast this proposal will severely restrict flight corridors

Have still to see the benefits from such actions will it not have severe restrictions on general aviation

On that simplified complaint I register my objection

Regards





Re: [Airspace] Objection

1 message

26 September 2023 at 10:01

Good morning [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 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 comment 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 GA operations, and proves why stakeholder engagement is an important part of the process.

We have received valuable information like yours, from the GA community regarding flying routes used frequently in Northumberland. As a direct result of this feedback we will now undertake a period of review before communicating a revised TDA with stakeholders. We will include you in this communication and look forward to sharing this with you in the near future.

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, 16 Sept 2023 at 15:11, [REDACTED] wrote:

To whom it may concern

I'm writing to express my concerns to the proposed drone trials in airspace in the Newcastle areas etc

As a pilot flying out Carlisle Airport and have been flying down the East coast this proposal will severely restrict flight corridors

Have still to see the benefits from such actions will it not have severe restrictions on general aviation

On that simplified complaint I register my objection

Regards [REDACTED]



[Airspace] Comment on airspace change proposal ACP-2023-015

1 message

17 September 2023 at 11:07



To whom it may concern,

I would like to comment on the airspace change proposal ACP-2023-015 which I recently became aware of. I am a private pilot based in Lancashire and currently operate a microlight aircraft. I regularly tour the North East and East coast of the UK in my microlight airfield, and am fortunate to have already visited such airfields as Eshott, Hexham and Stanton airfields, which are fantastic airfields run by a fabulous community.

I was therefore shocked to see the extend of your ACP, which I believe to be completely ignored the private flying community in the area that it covers. Due to the unnecessary adding of 600ft onto the tallest feature across the ACP area, effectively this means your TDA closes airspace up to 1,500ft above ground level. The consequence of this is that your proposal completely blocks the very busy coastal transit route under the Newcastle Zone and also prevent transits of the key Tyne Valley transit route when the cloud base is around 2000ft (which is often the case in that area). Your proposal also effectively closes both Hexham and Stanton airfields.

While I have no views about drone use and, in particular, I welcome any innovation that can help the NHS - the outcomes and benefits of your trial could easily be obtained using regular motor vehicles. I fail to see how closing this valuable and much-used airspace for 6 months will prove that drone operations can replace the existing system.

I sincerely hope you will withdraw this proposal and return with a more sensible propersition that works WITH the flying community, so that both drones and light aircraft can operate in the same space in harmony. Allowing drones to effectively "lock out" other airspace uses, such as the light aircraft I operate, is completely and utterly unacceptable.

By banning me and my fellow recreational aviators from this airspace, you will be ensuring that we no longer land at the airfields I have mentioned, which will mean the local economy will lose out.





Re: [Airspace] Comment on airspace change proposal ACP-2023-015

1 message

26 September 2023 at 10:03

Good morning [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 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 before conducting further engagement.

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 will make adjustments as a result of feedback we have received during the stakeholder engagement.

We have received valuable information like yours, from the GA community regarding flying routes used frequently in Northumberland. As a direct result of this feedback we will now undertake a period of review before communicating a revised TDA with stakeholders. We will include you in this communication and look forward to sharing this with you in the near future.

Apian is a healthcare company which was founded by two NHS doctors, and all of our work is focused on providing improved healthcare to our patients and clinicians. We will happily support 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.

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 Sun, 17 Sept 2023 at 11:07, [REDACTED] wrote:

To whom it may concern,

I would like to comment on the airspace change proposal ACP-2023-015 which I recently became aware of. I am a private pilot based in Lancashire and currently operate a microlight aircraft. I regularly tour the North East and East

coast of the UK in my microlight airfield, and am fortunate to have already visited such airfields as Eshott, Hexham and Stanton airfields, which are fantastic airfields run by a fabulous community.

I was therefore shocked to see the extent of your ACP, which I believe to be completely ignored the private flying community in the area that it covers. Due to the unnecessary adding of 600ft onto the tallest feature across the ACP area, effectively this means your TDA closes airspace up to 1,500ft above ground level. The consequence of this is that your proposal completely blocks the very busy coastal transit route under the Newcastle Zone and also prevent transits of the key Tyne Valley transit route when the cloud base is around 2000ft (which is often the case in that area). Your proposal also effectively closes both Hexham and Stanton airfields.

While I have no views about drone use and, in particular, I welcome any innovation that can help the NHS - the outcomes and benefits of your trial could easily be obtained using regular motor vehicles. I fail to see how closing this valuable and much-used airspace for 6 months will prove that drone operations can replace the existing system.

I sincerely hope you will withdraw this proposal and return with a more sensible proposition that works WITH the flying community, so that both drones and light aircraft can operate in the same space in harmony. Allowing drones to effectively "lock out" other airspace uses, such as the light aircraft I operate, is completely and utterly unacceptable.

By banning me and my fellow recreational aviators from this airspace, you will be ensuring that we no longer land at the airfields I have mentioned, which will mean the local economy will lose out.



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.

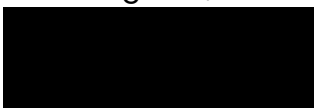
Apian, in conjunction with the Northumbria Healthcare NHS Foundation Trust, is looking to conduct feasibility flights using UAS between hospitals, GP surgeries, care homes and pharmacies. We would like to trial a regular, on demand delivery service for the distribution of medical payloads such as, prescription 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,




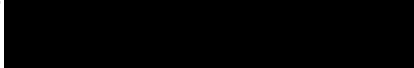
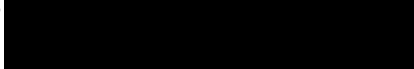
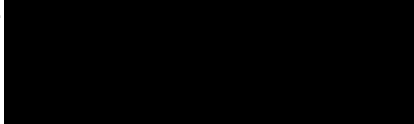
How to provide feedback

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 

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:		



Re: [Airspace] Feedback on airspace changes

1 message

26 September 2023 at 18:15



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.

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.


We have received valuable information from the GA community regarding flying routes used frequently in Northumberland. As a direct result of this feedback we will now undertake a period of review before communicating a revised TDA with stakeholders.

We will include you in this communication and look forward to sharing this with you in the near future.

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.

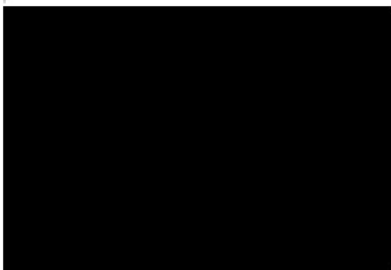
Kind regards,



On Sun, 17 Sept 2023 at 13:06  wrote:

Please see attached feedback form.

--





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

1 message

17 September 2023 at 16:33

[REDACTED]

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.

[REDACTED]

The density of traffic proposed i.e. 74 flights per day (0800 - 1800) + 8 flights per day (1800 - 0800) make this an effective no-fly zone for the enormous area involved. No amount of NOTAM based notification could allow any practical co-existence of GA (General Aviation) traffic in this region. Indeed, it is disingenuous for Apian to claim that the TDA could be activated & deactivated in any meaningful way such as to allow shared access to the airspace by GA traffic.

Concerning Areas C & D. The Tyne valley is a major coast to coast transit route 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 coastal access. I have used this route many times for access between Carlisle and Eshott. Under low cloud conditions this channel would be completely blocked by the proposed TDA, leaving no navigable class G airspace without recourse to transits from Newcastle & Spadeadam - or a ridiculous great circle around Spadeadam/Otterburn, itself infeasible under low-cloud conditions.

Concerning Area B (SFC-1300ft). This effectively blocks coastal transits underneath the 1500ft Newcastle CTA 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 will be to head further out to sea, significantly increasing risk for air users.

Overall this represents an outrageous hijacking of VFR airspace by a private company, to the detriment of all VFR flying in the region. I object in the strongest possible terms.



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

1 message

26 September 2023 at 18:20

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 current proposal defines the operations as 24/7, however this will be reviewed following feedback from stakeholders. We will practise flexible use of airspace when possible. We have already raised some concerns highlighted to us by stakeholders with the regulator regarding the timeliness of deactivation from our previous trial and are finalising details with the CAA of an improvement process, however if you have suggestions to improve the safe sharing of NOTAM information, please let us know and we can discuss them with the CAA.

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.

We have received valuable information like yours, from the GA community regarding flying routes used frequently in Northumberland. As a direct result of this feedback we will now undertake a period of review before communicating a revised TDA with stakeholders. We will include you in this communication and look forward to sharing this with you in the near future.

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 Sun, 17 Sept 2023 at 16:33 [REDACTED] wrote:

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.

The density of traffic proposed i.e. 74 flights per day (0800 - 1800) + 8 flights per day (1800 - 0800) make this an effective no-fly zone for the enormous area involved. No amount of NOTAM based notification could allow any practical co-existence of GA (General Aviation) traffic in this region. Indeed, it is disingenuous for Apian to claim that the TDA could be activated & deactivated in any meaningful way such as to allow shared access to the airspace by GA traffic.

Concerning Areas C & D. The Tyne valley is a major coast to coast transit route 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 coastal access. I have used this route many times for access between Carlisle and Eshott. Under low cloud conditions this channel would be completely blocked by the proposed TDA, leaving no navigable class G airspace without recourse to transits from Newcastle & Spadeadam - or a ridiculous great circle around Spadeadam/Otterburn, itself infeasible under low-cloud conditions.

Concerning Area B (SFC-1300ft). This effectively blocks coastal transits underneath the 1500ft Newcastle CTA 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 will be to head further out to sea, significantly increasing risk for air users.

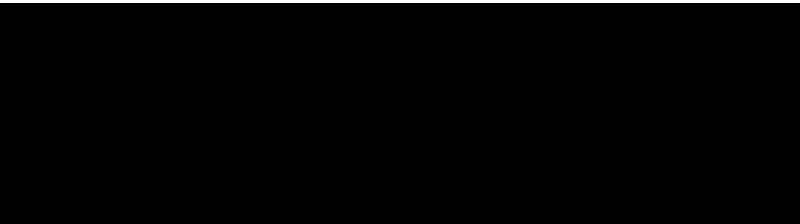
Overall this represents an outrageous hijacking of VFR airspace by a private company, to the detriment of all VFR flying in the region. I object in the strongest possible terms.



[Airspace] Fwd: Proposed ACP Newcastle

1 message

17 September 2023 at 16:49



Hello

I am writing regarding your proposed drone trial covering the Tyne valley and coastal route around Newcastle airspace.

A pilot this is an route I use regularly as I conduct business in Northumberland and also Durham.

The proposed ceiling restriction would completely rule out the western passage on all but the best of days, and the Eastern route would push aircraft further out over the sea than they could safely recover from if an engine failure occurred.

Added to this the closure of 2 airfields for the duration of the trial.

it seems that the trial has been badly thought out in the way that the ceilings have been calculated, and I urge you to reconsider this and take into account other users.

Many thanks





Re: [Airspace] Proposed ACP Newcastle

1 message

26 September 2023 at 12:58



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, 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 will make adjustments as a result of feedback we have received during the stakeholder engagement.

We have received valuable information like yours, from the GA community regarding flying routes used frequently in Northumberland. As a direct result of this feedback we will now undertake a period of review before communicating a revised TDA with stakeholders. We will include you in this communication and look forward to sharing this with you in the near future.

We will now undertake a period of review before communicating a revised TDA with stakeholders, which we look forward to sharing with you in the near future.

Kind regards,



On Sun, 17 Sept 2023 at 11:49, [REDACTED] wrote:

Hello

I am writing regarding your proposed drone trial covering the Tyne valley and coastal route around Newcastle airspace.

As a pilot this is an route I use regularly as I conduct business in Northumberland and also Durham.

The proposed ceiling restriction would completely rule out the western passage on all but the best of days, and the Eastern route would push aircraft further out over the sea than they could safely recover from if an engine failure occurred.

Added to this the closure of 2 airfields for the duration of the trial.

it seems that the trial has been badly thought out in the way that the ceilings have been calculated, and I urge you to reconsider this and take into account other users.

Many thanks





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

1 message

17 September 2023 at 17:33

Good afternoon

I am providing feedback as requested below.

This proposal should not go ahead because it is in direct contradiction of the UK CAA policy set out in CAP 2533 which sets out the policy of enabling the integrated, unsegregated operations for all airspace users. In other words not having any special airspace for Beyond Visual Line of Sight (BVLOS) Unmanned Aircraft as proposed in this ACP.

This is a particularly selfish ACP as it seeks to carve out airspace for a small commercial organisation to the detriment of other established airspace users. This 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 hence compromising the safety of existing airspace users.

The granting of such an ACP would permit the operator to do as it pleased, reserving and blocking the airspace from others because in my experience as a practising private pilot these zones are never given back to the community when they are not in use. Hence I support the CAA CAP 2533 in looking for an integrated solution.

This ACP should be rejected.

Regards



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

1 message

26 September 2023 at 18:23

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, like yourself, very much welcome the CAA's CAP2533 (Airspace Policy Concept: Airspace Requirements for the Integration of Beyond Visual Line of Sight (BVLOS) Unmanned Aircraft). CAP2533 presents an airspace policy concept that describes a pathway forward to deliver that integration, all of which need to be trialled and tested appropriately. We will be working with the CAA to provide any feedback and data from our trial that will contribute and support the refinement of this concept.

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 will make adjustments as a result of feedback we have received during the stakeholder engagement.

We have received valuable information like yours, from the GA community regarding flying routes used frequently in Northumberland. As a direct result of this feedback we will now undertake a period of review before communicating a revised TDA with stakeholders. We will include you in this communication and look forward to sharing this with you in the near future.

We will now undertake a period of review before communicating a revised TDA with stakeholders, which we look forward to sharing with you in the near future.

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]

Good afternoon

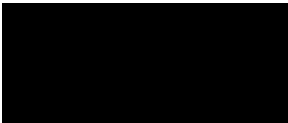
I am providing feedback as requested below.

This proposal should not go ahead because it is in direct contradiction of the UK CAA policy set out in CAP 2533 which sets out the policy of enabling the integrated, unsegregated operations for all airspace users. In other words not having any special airspace for Beyond Visual Line of Sight (BVLOS) Unmanned Aircraft as proposed in this ACP.

This is a particularly selfish ACP as it seeks to carve out airspace for a small commercial organisation to the detriment of other established airspace users. This 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 hence compromising the safety of existing airspace users. The granting of such an ACP would permit the operator to do as it pleased, reserving and blocking the airspace from others because in my experience as a practising private pilot these zones are never given back to the community when they are not in use. Hence I support the CAA CAP 2533 in looking for an integrated solution.

This ACP should be rejected.

Regards



ACP-2023-015

Proposed Drone Trials for Northumbria NHS Trust

As the holder of a private pilots' licence and owner of a microlight aeroplane based at Carlisle Airport, I am considered a "stakeholder" by this proposal. I have read the verbiage supplied by the sponsor, Apian, attempting to justify the proposal and, accordingly, treat what is said by the proposer on behalf of the Northumbria NHS Trust with a huge amount of scepticism.

Dredging through the copious quoted reports and claims, some referring to an earlier trial, the hyperbole used is excessive and makes statements as though they are fact.

In essence, what is wanted by the proposer is for the Northumbrian NHS to use another company, called Zipline, to operate from a Northumbria hub base for multiple fixed wing drones to "parachute" medical supplies and equipment up to 25kgs in weight to nominated destinations inside specific control zones along the Tyne Valley and lower parts of Northumberland.

These proposed control zones will create choke points in East and West directions preventing GA traffic access to class G airspace along the Tyne Valley.

The majority of the GA users' aircraft in this region may only fly in VMC and under VFR conditions.

The proposal will require the use of controlled airspace up to specified heights within each delivery zone to an upper limit but have a lower height of 650ft agl.

A map is included in the proposer's explanation of their needs but it is a geographical map. They do not draw attention to the heavily restricted controlled areas by using an appropriate aviation chart.

If this had been done, the extent of military danger zones would be clear. One major area of restriction is Spadeadam, which

also conducts frequent GPS jamming trials reaching a distance of 40 or 50 miles. It seems ludicrous to despatch drones that are reliant upon GPS systems for accurate navigation into airspace subject to jamming.

Trials are expected to create routes for the drones and thus become a standard operating pattern although varied by wind direction and speed.

The proposal put forward is basically a hypothesis considering what will happen and how the suggested expectations will be met. The hypothesis is written in a way to suggest successful delivery of NHS goods and medicines but relies upon assumption rather than factual reality. Of course, the proposal is worded in such a way to emphasise patients' medical needs even though the target population for the proposed service is only about 520,000 people.

A constructive argument against the proposal could be that fixed wing drones will not be used within urban areas and which have the greatest population density.

Further, it is not made clear that the drone delivery system is just a one-way supply and does nothing to enhance the other medical requirements from the patient back to the hospital/hub.

There is no real consideration given in the hypothesis to the disadvantages it causes to what is described as "stakeholders." The main stakeholders being the GA community who regularly use the airspace along the Tyne Valley corridor.

This may well be a deliberate tactic by the proposer because they invite comment from stakeholders to be made directly to themselves and thus have a way of subsequently presenting those comments to the CAA in a more favourable light for themselves.

Emphasis is placed in the proposal on perceived benefits to the NHS and various cost savings, however, no mention is given to the costs of capital and labour involved in setting up the proposal. All of these "start-up" costs will become borne by the Northumbria NHS Trust.

Comparisons are given of drone use for medical purposes in Africa and the USA but they are not really relevant to the proposed Newcastle Airport regulated airspace and choke points.

As is the case in all hypothesis there is the need to prove it or not. That should be the purpose of setting up the proposed trials, however, it seems - at least to my mind - that once completed there will be an expected acceptance by the stakeholders and thus the template for permanent restricted airspace will be in place.

I think there is also another consequence likely to erode the liberty of class G airspace users; that being the eventual creation of a Newcastle transponder mandatory area covering the NHS created restricted areas.

Another concern regarding the Apian proposal is the use of Military low level fast jet routes. They route north to the west of Hexham and south to the east. So, will the use of these routes also be restricted?

Finally, the whole of this area is served by the Great North Air Ambulance from two bases; Penrith and Teesside. They, as "Helimed" aircraft, fly in response to an emergency with an Alpha call sign and are accorded priority. How are these operations going to be handled by the Apian proposal?

Offering comment through the proposer just gives Apian room to modify the way the trial proposals and conclusions are presented in order to suit their own ends.

My position is clear in opposition to Apian's proposals.





Re: [Airspace] ACP-2013-015 Proposed Drone Operations for Northumbria NHS Trust

1 message

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 received valuable information like yours, from the GA community regarding flying routes used frequently in Northumberland. As a direct result of this feedback we will now undertake a period of review before communicating a revised TDA with stakeholders. We will include you in this communication and look forward to sharing this with you in the near future.

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 will make adjustments as a result of feedback we have received during the stakeholder engagement.

Regarding the mapping used in our Trial plan. We used a CAA 1:250,000 aviation chart, and there are no military danger areas present on that particular segment of the map. However, we are in contact with the military, including RAF Spadeadam, who have provided us with the exercises that take place at RAF Spadeadam and in the local area.

A copy of all the stakeholder feedback we have received will be sent to the CAA as part of our submission. This feedback will not be adjusted by the sponsor and will be available for you to view on the ACP portal when we submit. The feedback will be redacted to not share any personal information.

Africa and the USA are pioneering this and we would like the UK, specifically the NHS, to benefit from the reliability, sustainability of this technology. Given there are differences in airspace/regulations, we would like to ensure safe integration whilst pushing the boundaries through innovation both in the aviation and healthcare sector.

Apian is a healthcare company which was founded by two NHS doctors, and all of our work is focused on providing improved healthcare to our patients and clinicians. We will happily support 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.

The focus of this trial is on healthcare integration, the benefits to the patients and the wider healthcare system, whilst safely implementing UAS technology. We will also measure the impact on care pathways, patient outcomes and staff wellbeing. During our previous operations, 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. These were successfully demonstrated, with no impact to their operations. For this trial the procedures are currently being finalised and will form part of our submission to the CAA as part of the airspace change process.

This trial will be funded by [SBRI](#) and Apian and not the NHS.

We will now undertake a period of review before communicating a revised TDA with stakeholders, which we look forward to sharing with you in the near future.

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.



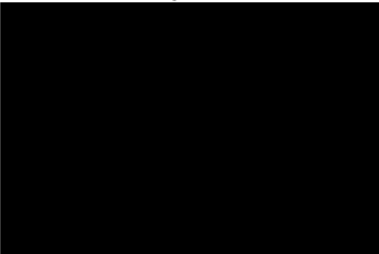
On Sun, 17 Sept 2023 at 21:02, [Redacted] wrote:

Hello,

Attached is my response to the proposed drone trials by Apian on behalf of the Northumbria NHS Trust.

I look forward to learning the outcome in due course.

Yours sincerely





[Airspace] ACP-2023-015

1 message

17 September 2023 at 12:25

Folks, I wish to object to this in the strongest possible terms.

It will be a disaster for pilots in the north-east of England.

The proposed airspace change will create a Temporary Danger Area (TDA) across a huge area of airspace around Northumbria.

"It closes two grass airstrips, Hexham and Stanton, 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 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

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 four miles out to sea, significantly increasing risk for these air users who are traditionally historic aircraft or basic microlights.

Areas 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 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 claims: '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.

During previous UAS operations on the Northumberland coast, the BMAA Airspace Team 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.

To summarise, 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.





Re: [Airspace] ACP-2023-015

1 message

26 September 2023 at 18:43

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 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 will make adjustments as a result of feedback we have received during the stakeholder engagement.

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.

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 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

We have received valuable information like yours, from the GA community regarding flying routes used frequently in Northumberland. As a direct result of this feedback we will now undertake a period of review before communicating a revised TDA with stakeholders. We will include you in this communication and look forward to sharing this with you in the near future.

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 Sun, 17 Sept 2023 at 12:25 [REDACTED] wrote:

Folks, I wish to object to this in the strongest possible terms.

It will be a disaster for pilots in the north-east of England.

The proposed airspace change will create a Temporary Danger Area (TDA) across a huge area of airspace around Northumbria.

"It closes two grass airstrips, Hexham and Stanton, 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 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

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 four miles out to sea, significantly increasing risk for these air users who are traditionally historic aircraft or basic microlights.

Areas 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 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 claims: '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.

During previous UAS operations on the Northumberland coast, the BMAA Airspace Team 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.

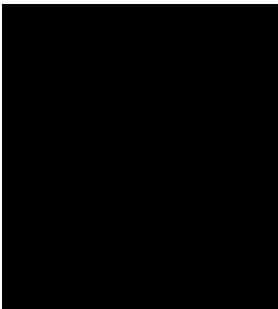
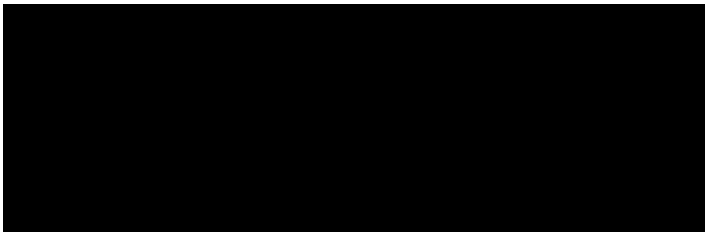
Instead, airspace remained blocked to other users despite it being unused for days. Apian should release airspace once it is clear operations will be suspended. In the interest of transparency, Airspace usage statistics (days/hours flown v days/hours Notamed) should be publicly available to both the GA community and the regulator.

To summarise, 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.

18 September 2023



ACP-2023-015

Whilst I am generally supportive of the use of drones to improve patient care, reducing the need for road transportation of blood and other medical payloads, I find myself deeply concerned by the application for a trial TDA as you have currently specified it.

First and foremost, the TDA design has somehow failed to adhere to the CAA requirement to minimise impact on other air users. Your design closes two grass airstrips, will cause a blockage in the busy East Coast VFR coastal transit route under the Newcastle CTA and will create choke points which will inevitably create extra workload for Newcastle ATC as more of us seek transit through their zone.

In more detail Area B effectively blocks the east coast route under the base of the 1500' Newcastle CTA leaving the only option for non-radio traffic to head 4 miles out to sea, obviously a significant risk for SEP aircraft.

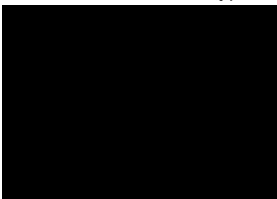
Hexham and Stanton airstrips will be closed with Area C is active.

Setting the vertical limit to 600' AGL of the tallest know feature results in a 1750' AMSL for Area C and 2000' AMSL for Area D with the consequent impact that the TDA will be largely 1000'-1500' AGL rather than the claimed 600'. That will entirely unnecessarily close the Tyne valley coast-to-coast transit route when there are low cloud bases.

Your failure to offer a DACS means none of the above can be mitigated.

I therefore object in the strongest possible terms to your design and request that you reconsider it so as to allow shared airspace and safe integration with GA traffic rather than simply excluding GA traffic for your commercial benefit.

Yours faithfully,





Re: [Airspace] ACP-2023-015

1 message

2 October 2023 at 16:39

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 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 will make adjustments as a result of feedback we have received during the stakeholder engagement.

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 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.

We have received valuable information like yours, from the GA community regarding flying routes used frequently in Northumberland. As a direct result of this feedback we will now undertake a period of review before communicating a revised TDA with stakeholders. We will include you in this communication and look forward to sharing this with you in the near future.

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 Mon, 18 Sept 2023 at 09:24, [REDACTED] wrote:

Dear Sir/Madam,

Please find addressed my feedback in relation to the above proposal,

Yours faithfully



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

1 message

18 September 2023 at 15:24

Feedback on Trial Plan Northumbria Stage 2 ACP-2023-015

I am a GA pilot based at Rufforth airfield. I often fly to and from the north. This TDA will have a massive impact on all GA aircraft travelling North/South.

Due to the frequent bad weather and low cloudbase, GA aircraft transiting to and from Scotland can generally either operate to the West of the Pennines or to the East of the Pennines. It is often the case that the weather makes crossing the Pennines East/West impossible. So in effect this TDA, for a large part of the time, will be a total block on GA movement - cloudbase won't allow pilots to safely overfly the TDA, nor will it allow them to cross the Pennines.

There is no detail on how Trial 2 will somehow scale up from making thirty-two 'useful' deliveries in the three months of the first trial, to making eighty flights a day. My strong suspicion is that for most of the time, most of the TDA will be entirely empty. Meanwhile GA pilots will be pushed into hazardous long water crossings to the East, or scud-running over the top of the empty TDA, or flirting with catastrophe amongst the Pennine hills. Or their aircraft will stay in their hangars, whilst the pilot's skills fade and the cylinder bores rust up. Will Apian be compensating these GA pilots?

If a 'comprehensive and robust airspace deconfliction procedure' is possible with some stakeholders, then why not all?

'Activation of specific segments for individual flights' is mentioned, but this is not detailed. The precise mechanisms and amount of notice etc would be vitally important. A GA pilot does not want to find that whilst he is airborne, part of his route has now been blocked. Or that on arrival to the North, his return path is suddenly closed.

Why is Zone C so massive? It precludes transiting to the West of Newcastle and it precludes obtaining a crossing through Newcastle Zone.

Hopefully the CAA will kick this proposal straight into touch. Laying claim to such a huge tranche of airspace for a 'trial' is ludicrous. If/when interoperability is sorted out, then the size of the area of operations becomes irrelevant.

A blanket six-month 24/7 Hadrian's Wall in the sky is totally unacceptable.

Yours



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

1 message

3 October 2023 at 09:32

Good morning [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.

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

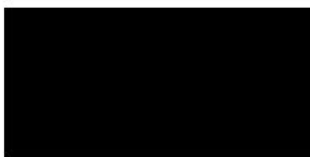
If we anticipate the TDA is not required during the trial we will cancel it as per the NOTAM process. Cancellations of TDA usage are due to daily limitations (e.g. weather, medical deliveries complete) therefore cancellations are not often seen in advance. This approach to TDA utilisation is taken to 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 following feedback on our previous trial and are finalising details with the CAA of an improvement process.

We have received valuable information from the GA community regarding flying routes used frequently in Northumberland. As a direct result of this feedback we will now undertake a period of review before communicating a revised TDA with stakeholders.

We will include you in this communication and look forward to sharing this with you in the near future.

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,



I am a GA pilot based at Rufforth airfield. I often fly to and from the north. This TDA will have a massive impact on all GA aircraft travelling North/South.

Due to the frequent bad weather and low cloudbase, GA aircraft transiting to and from Scotland can generally either operate to the West of the Pennines or to the East of the Pennines. It is often the case that the weather makes crossing the Pennines East/West impossible. So in effect this TDA, for a large part of the time, will be a total block on GA movement - cloudbase won't allow pilots to safely overfly the TDA, nor will it allow them to cross the Pennines.

There is no detail on how Trial 2 will somehow scale up from making thirty-two 'useful' deliveries in the three months of the first trial, to making eighty flights a day. My strong suspicion is that for most of the time, most of the TDA will be entirely empty. Meanwhile GA pilots will be pushed into hazardous long water crossings to the East, or scud-running over the top of the empty TDA, or flirting with catastrophe amongst the Pennine hills. Or their aircraft will stay in their hangars, whilst the pilot's skills fade and the cylinder bores rust up. Will Apian be compensating these GA pilots?

If a 'comprehensive and robust airspace deconfliction procedure' is possible with some stakeholders, then why not all?

'Activation of specific segments for individual flights' is mentioned, but this is not detailed. The precise mechanisms and amount of notice etc would be vitally important. A GA pilot does not want to find that whilst he is airborne, part of his route has now been blocked. Or that on arrival to the North, his return path is suddenly closed.

Why is Zone C so massive? It precludes transiting to the West of Newcastle and it precludes obtaining a crossing through Newcastle Zone.

Hopefully the CAA will kick this proposal straight into touch. Laying claim to such a huge tranche of airspace for a 'trial' is ludicrous. If/when interoperability is sorted out, then the size of the area of operations becomes irrelevant.

A blanket six-month 24/7 Hadrian's Wall in the sky is totally unacceptable.

Yours





[Airspace] Objection to Apian Northumbria NHS Air Grid Trial Plan Stage 2 ACP-2023-015

1 message

18 September 2023 at 13:28

To whom it may concern

I wish to register my objection to ACP-2023-015 as the design and proposal does not adhere to the CAA requirement to minimise the impact on other air users.

The current proposal will close 2 grass airstrips, blocks the ability to transit beneath the Newcastle CTA along the east coast, forcing pilots to request a zone transit through controlled airspace whilst also increasing the workload of Newcastle ATC.

The proposal is also unreasonable in its vertical planning which extends to 1,500ft AGL in the Tyne Valley route. To use a lazy and arbitrary measurement of 600ft AGL above the tallest known feature to close airspace, is unreasonable in that it effectively in the majority of the proposed route closes airspace in the TDA to between 1000 - 1500ft AGL and not the claimed 600ft.

The limited ability of the drone has meant that on a great number of occasions airspace in the previous trial ACP-2022-031 remained closed due to weather or technical issues. This oversight and failure to consider other airspace users either via the use of a DAC's service or updated NOTAM is also unacceptable and demonstrates no consideration to other airspace users. APIAN have no method in place to release airspace. It is also noted that APIAN have not provided airspace usage statistics including dates, hours flown or serviceability / weather restrictions from the previous trial.

In summary the entire trial, sweeping approach to the closing of airspace and the failure of APIAN to consider and put effective measures in place to minimise the impact to other airspace users, demonstrates that the trial is flawed in its conception. The trial should be delayed until effective consultation with other airspace users has taken place.

Regards



Re: [Airspace] Objection to Apian Northumbria NHS Air Grid Trial Plan Stage 2 ACP-2023-015

1 message

3 October 2023 at 10:24

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 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 will make adjustments as a result of feedback we have received during the stakeholder engagement.

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. You will find a report from our previous trial on the ACP portal [here](#).

We have received valuable information like yours, from the GA community regarding flying routes used frequently in Northumberland. As a direct result of this feedback we will now undertake a period of review before communicating a revised TDA with stakeholders. CAP 1616 describes the stakeholder engagement required as part of a trial airspace change application.

We will include you in this communication and look forward to sharing this with you in the near future.

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 Mon, 18 Sept 2023 at 13:28, [REDACTED] wrote:
To whom it may concern

I wish to register my objection to ACP-2032-015 as the design and proposal does not adhere to the CAA requirement to minimise the impact on other air users.

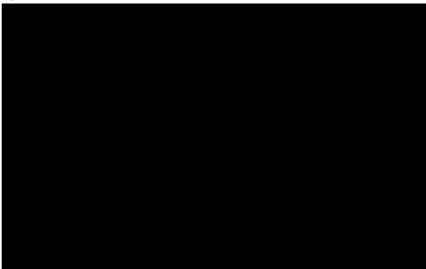
The current proposal will close 2 grass airstrips, blocks the ability to transit beneath the Newcastle CTA along the east coast, forcing pilots to request a zone transit through controlled airspace whilst also increasing the workload of Newcastle ATC.

The proposal is also unreasonable in its vertical planning which extends to 1,500ft AGL in the Tyne Valley route. To use a lazy and arbitrary measurement of 600ft AGL above the tallest known feature to close airspace, is unreasonable in that it effectively in the majority of the proposed route closes airspace in the TDA to between 1000 - 1500ft AGL and not the claimed 600ft.

The limited ability of the drone has meant that on a great number of occasions airspace in the previous trial ACP-2022-031 remained closed due to weather or technical issues. This oversight and failure to consider other airspace users either via the use of a DAC's service or updated NOTAM is also unacceptable and demonstrates no consideration to other airspace users. APIAN have no method in place to release airspace. It is also noted that APIAN have not provided airspace usage statistics including dates, hours flown or serviceability / weather restrictions from the previous trial.

In summary the entire trial, sweeping approach to the closing of airspace and the failure of APIAN to consider and put effective measures in place to minimise the impact to other airspace users, demonstrates that the trail is flawed in its conception. The trail should be delayed until effective consultation with other airspace users has taken place.

Regards





[Airspace] DRONE TRIAL

1 message

18 September 2023 at 16:10

[REDACTED]

In response to your proposed Drone Trial consultation.

I very strongly object to your proposal to impose a Temporary Danger Area in the South Tyne Valley.

The farming community is under pressure in many ways at present and we are encouraged to diversify to survive, we are a small family run farm.

If Hexham Airfield, which is on our land, is forced to close or is restricted for 6 months we will be forced to contact the CAA office of General Council with regard to compensation.

I am not a pilot but can see the danger that will be caused by the TDA to safe flight.


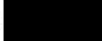
[REDACTED]



[Airspace] Re: DRONE TRIAL

1 message

3 October 2023 at 09:44


Good morning 

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 fully understand your concerns and want to assure you we do not intend to close airfields down. We have been in contact and continue to be with Hexham Airfield to reiterate this.

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 before conducting further engagement.

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, 18 Sept 2023 at 16:11,  wrote:

In response to your proposed Drone Trial consultation.

I very strongly object to your proposal to impose a Temporary Danger Area in the South Tyne Valley.

The farming community is under pressure in many ways at present and we are encouraged to diversify to survive, we are a small family run farm.

If Hexham Airfield, which is on our land, is forced to close or is restricted for 6 months we will be forced to contact the CAA office of General Council with regard to compensation.

I am not a pilot but can see the danger that will be caused by the TDA to safe flight.






[Airspace] ACP-2023-015

1 message

18 September 2023 at 16:52


cc: airspace.policy@caa.co.uk

I am a fixed wing microlight pilot, who although I am based in Scotland I frequently fly down the East Coast enroute to Yorkshire or further down the country. I object to the ACP for a number of reasons, 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. This is an area I frequently transit, sometimes at ATC's request. 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 GA and Microlight 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 and Microlight 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. A similar trial around the Oban area in Scotland resulted in very few drone flights per day and many days when there were none so no crossing service means that many pilots would be blocked and forced into rerouting when it is actually not necessary.

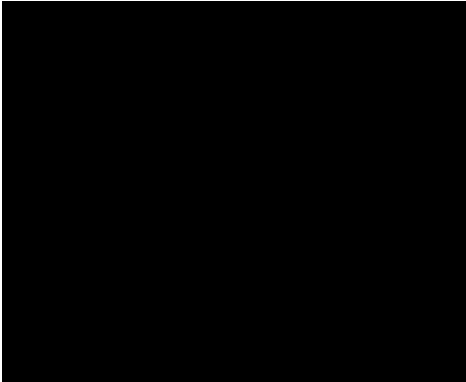
TDA Activation

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 and Scotland transiting the area. 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] ACP-2023-015

1 message

3 October 2023 at 15:43

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 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 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 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 will make adjustments as a result of feedback we have received during the stakeholder engagement.

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

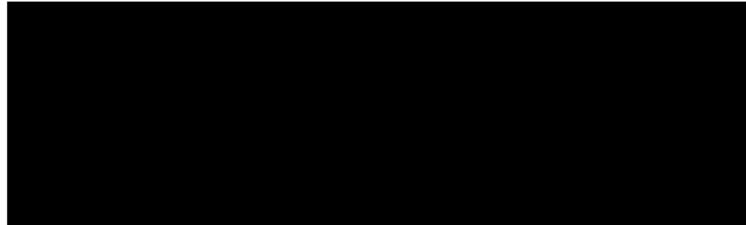
Regarding NOTAMs in our previous trial, these were cancelled by the UAS operator directly when we did not anticipate flying. As per the NOTAM process, these were cancelled through the Airspace Regulation (Utilisation) Operations team at the CAA, who communicate them to the aviation industry. Cancellations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

We have received valuable information like yours, from the GA community regarding flying routes used frequently in Northumberland. As a direct result of this feedback we will now undertake a period of review before communicating a revised TDA with stakeholders. We will include you in this communication and look forward to sharing this with you in the near future.

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 Mon, 18 Sept 2023 at 16:52, [REDACTED] wrote:



I am a fixed wing microlight pilot, who although I am based in Scotland I frequently fly down the East Coast enroute to Yorkshire or further down the country. I object to the ACP for a number of reasons, 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. This is an area I frequently transit, sometimes at ATC's request. 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 GA and Microlight 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 and Microlight 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. A similar trial around the Oban area in Scotland resulted in very few drone flights per day and many days when there were none so no crossing service means that many pilots would be blocked and forced into rerouting when it is actually not necessary.

TDA Activation

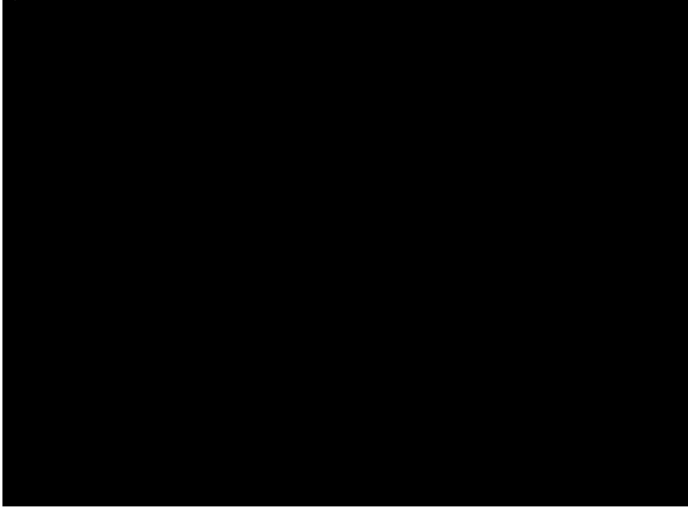
During previous Apian UAS operations on the Northumberland Coast (ACP-2022-031), I didn't see any evidence that Apian cancelled TDA activation by fresh Notam when operations were suspended for weather or serviceability, often for days on end. Instead airspace remained blocked to other users despite it 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.

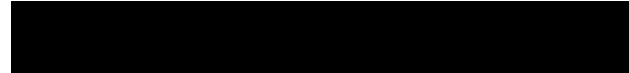
Summary

The extensive and disproportionate nature of this TDA will severely and negatively impact other air users in Northern England and Scotland transiting the area. 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

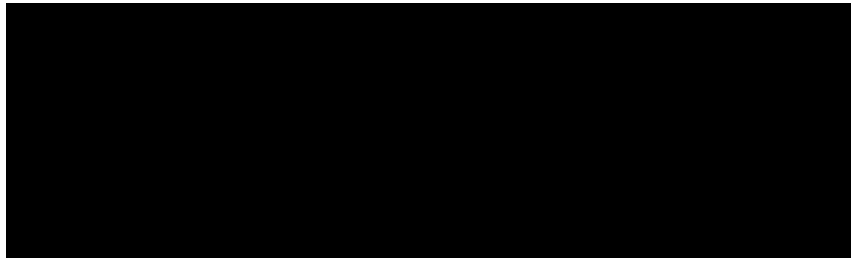




[Airspace] ACP-2023-015 Apian Northumbria

1 message

5 September 2023 at 23:44



I would like to strongly object to this ACP which blocks a significant area of highly used airspace from other airspace users for a considerable amount of time and for no good reason.

This is just yet another run of the same drone delivery trial that has been run many times before, including by Apian, which proves that a drone can deliver a small package to another location on days with nice weather aided by a large support team and inconveniencing many other people. It could be done much more reliably and cheaper by someone on a motorbike! Apian say the NHS doesn't pay for these trials, that is true, because they are paid for by us the tax payer in the form of massive grants, which are the real reason for doing these trials to get the grant money.

£800,000 for this trial would be far better spent on something else, even if it's just running a drone trial in a current danger area to prove the autonomous detect and avoid system that Apian say the drone is equipped with, this infact should be a pre-requisite for any more drone trials, that first they prove and certify an autonomous detect and avoid system, which must be completely autonomous based on Lidar or similar, not requiring other airspace users to have any type of equipment fitted.

Only once the autonomous detect and avoid system is certified then CAA should allow more of these trials to go ahead, with the drones flying not above 400ft AGL, but not requiring any segregated airspace.

The current ACP blocks or squeezes traffic either side of the Newcastle CTR into very small gaps of airspace, which might be filled with cloud on two very busy north south routes and also prevents operation from several airstrips inside the TDA. With the TDA upto 1300ft to the east under the controlled airspace above 1500ft this is unacceptable. forcing aircraft to go further offshore, or try to get a transit through the controlled airspace when Newcastle ATC are short staffed and very busy. The TDA should only be upto 400ft over the sea and should be referenced to AGL rather than AMSL over land so that it is not made unnecessarily high covering the tallest object in a large area. To the west it is even worse with very high ceilings.

Apian say that due to the ceilings a DACS won't be provided, this might be acceptable if the ceiling was 400ft AGL and defined as AGL, but with the very high ceilings in AMSL based on the highest object within quite a large area, the TDA extends well into normal operating altitudes for many GA aircraft and thus a DACS must be mandatory H24, this could be replaced by an automatic response on the frequency when the TDA is inactive, stating that its inactive.

During previous trials the TDA wasn't deactivated in time when it wasn't being used. The rule should be that the TDA is inactive unless it is Notamed as active and this should only be done 24 hrs in advance and for specific time bands, say 2hr periods. Notams should then be re-issued if any operations are cancelled and all local airfields and ATC units informed immediately, this should be monitored closely by the CAA for compliance. Having a DACS would greatly simplify this, particularly with a recorded message if the TDA is inactive.

This ACP doesnt only affect local GA aircraft, I am not local but fly in the area several times a year and was there just last weekend. It would have severely impacted my flights. IT also affects many other airspace users who will effectively be banned from operating in the TDA such as paragliders and hang gliders, model aircraft fliers and hobby and even commercial drone fliers.

In summary this ACP is unacceptable, your course of action must be

1. prove and certify an autonomous detect and avoid system that works with no equipment required to be fitted to other airspace users, this should be done in an existing danger area for drones such as salisbury Plain or Aberporth/LLanbedr.

2. only then carry out this trial with certified drones not requiring any TDAs, operating in class G at 400ft AGL or below.

Regards





Re: [Airspace] ACP-2023-015 Apian Northumbria

1 message

4 October 2023 at 11:41

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 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. The UAS will be equipped with ADS-B in to provide the UAS operator with a picture of air traffic. The 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.

This trial will be funded by [SBRI](#) and Apian, and not the NHS.

It is important to understand that whilst other modes of transport provide an essential and critical service to the patients and clinicians within Northumbria, some are 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.

We believe drones can be utilised alongside transport like blood bikes for example. 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.

Thank you for suggesting a possible solution to providing the latest information on the activation status of the TDA to aircraft. We are continuing to re-evaluate the DACS and DAAIS requirements based on feedback from the aviation community and refinement of the airspace, and will consider your suggestions as part of this review

Our UAS operator conducts all operations below 600ft AGL, and we are currently re-evaluating 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.

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.

We have received valuable information like yours, from the GA community regarding flying routes used frequently in Northumberland. As a direct result of this feedback we will now undertake a period of review before communicating a revised TDA with stakeholders.

We will include you in this communication and look forward to sharing this with you in the near future.

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, 5 Sept 2023 at 23:44, [REDACTED] wrote:

I would like to strongly object to this ACP which blocks a significant area of highly used airspace from other airspace users for a considerable amount of time and for no good reason.

This is just yet another run of the same drone delivery trial that has been run many times before, including by Apian, which proves that a drone can deliver a small package to another location on days with nice weather aided by a large support team and inconveniencing many other people. It could be done much more reliably and cheaper by someone on a motorbike! Apian say the NHS doesn't pay for these trials, that is true, because they are paid for by us the tax payer in the form of massive grants, which are the real reason for doing these trials to get the grant money.

£800,000 for this trial would be far better spent on something else, even if it's just running a drone trial in a current danger area to prove the autonomous detect and avoid system that Apian say the drone is equipped with, this in fact should be a pre-requisite for any more drone trials, that first they prove and certify an autonomous detect and avoid system, which must be completely autonomous based on Lidar or similar, not requiring other airspace users to have any type of equipment fitted.

Only once the autonomous detect and avoid system is certified then CAA should allow more of these trials to go ahead, with the drones flying not above 400ft AGL, but not requiring any segregated airspace.

The current ACP blocks or squeezes traffic either side of the Newcastle CTR into very small gaps of airspace, which might be filled with cloud on two very busy north south routes and also prevents operation from several airstrips inside the TDA. With the TDA up to 1300ft to the east under the controlled airspace above 1500ft this is unacceptable. forcing aircraft to go further offshore, or try to get a transit through the controlled airspace when Newcastle ATC are short staffed and very busy. The TDA should only be up to 400ft over the sea and should be referenced to AGL rather than AMSL over land so that it is not made unnecessarily high covering the tallest object in a large area. To the west it is even worse with very high ceilings.

Apian say that due to the ceilings a DACS won't be provided, this might be acceptable if the ceiling was 400ft AGL and defined as AGL, but with the very high ceilings in AMSL based on the highest object within quite a large area, the TDA extends well into normal operating altitudes for many GA aircraft and thus a DACS must be mandatory H24, this could be replaced by an automatic response on the frequency when the TDA is inactive, stating that it is inactive.

During previous trials the TDA wasn't deactivated in time when it wasn't being used. The rule should be that the TDA is inactive unless it is Notamed as active and this should only be done 24 hrs in advance and for specific time bands, say 2hr periods. Notams should then be re-issued if any operations are cancelled and all local airfields and ATC units informed immediately, this should be monitored closely by the CAA for compliance. Having a DACS would greatly simplify this, particularly with a recorded message if the TDA is inactive.

This ACP doesnt only affect local GA aircraft, I am not local but fly in the area several times a year and was there just last weekend. It would have severely impacted my flights. IT also affects many other airspace users who will effectively be banned from operating in the TDA such as paragliders and hang gliders, model aircraft fliers and hobby and even commercial drone fliers.

In summary this ACP is unacceptable, your course of action must be

1. prove and certify an autonomous detect and avoid system that works with no equipment required to be fitted to other airspace users, this should be done in an existing danger area for drones such as salisbury Plain or Aberporth/LLanbedr.
2. only then carry out this trial with certified drones not requiring any TDAs, operating in class G at 400ft AGL or below.

Regards





[Airspace] ACP-2023-015 consultation feedback

1 message

18 September 2023 at 17:54

FEEDBACK:

The proposed TDA excludes and prevents use of Class G airspace well above 600 feet above ground level in many areas of the proposal. All of the areas identified as part of the TDA are affected and this prevents other flights, of the type I would conduct being able to take place should the cloud base prevent me climbing above the proposed height of the TDA. The only option would be to seek a crossing of the Newcastle CTA which at busy times (and at all times) puts unnecessary pressure on controllers, other aviators and the pilots making flights around the danger area. It's a significant diversion using excess fuel and time, and also meaning that light aircraft instead of flying over areas with little habitation may be forced to fly over built up areas. In the event that I would be unable to make a transit of the Newcastle CTA, this would mean a diversion well out to sea, which just wouldn't be appropriate or suitable for my vintage aircraft of 73 years without a transponder.

Several airstrips, in particular the airfield at Hexham and Stanton become inaccessible as there is no provision for a danger area crossing service.

It is my understanding that in a previous trial, notamed areas were not cancelled when not in use. It is for this reason that I am particularly concerned that if the same occurs in this trial, many other users' enjoyment of a very large piece of airspace is curtailed quite unnecessarily and excess workload to the Newcastle controllers may be the result.

All airspace users should be able to work in harmony and no element be excluded from utilising the airspace for any individual type of activity.

I look forward to reading the feedback document and hope that we can all work together to do the right thing.

Please acknowledge receipt of this email and an assurance that my feedback will be considered.



Re: [Airspace] ACP-2023-015 consultation feedback

1 message

 o>

4 October 2023 at 11:32

Dea 

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 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 will make adjustments as a result of feedback we have received during the stakeholder engagement.

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.

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

We have received valuable information like yours, from the GA community regarding flying routes used frequently in Northumberland. As a direct result of this feedback we will now undertake a period of review before communicating a revised TDA with stakeholders.

We will include you in this communication and look forward to sharing this with you in the near future.

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.


FEEDBACK:

The proposed TDA excludes and prevents use of Class G airspace well above 600 feet above ground level in many areas of the proposal. All of the areas identified as part of the TDA are affected and this prevents other flights, of the type I would conduct being able to take place should the cloud base prevent me climbing above the proposed height of the TDA. The only option would be to seek a crossing of the Newcastle CTA which at busy times (and at all times) puts unnecessary pressure on controllers, other aviators and the pilots making flights around the danger area. It's a significant diversion using excess fuel and time, and also meaning that light aircraft instead of flying over areas with little habitation may be forced to fly over built up areas. In the event that I would be unable to make a transit of the Newcastle CTA, this would mean a diversion well out to sea, which just wouldn't be appropriate or suitable for my vintage aircraft of 73 years without a transponder.

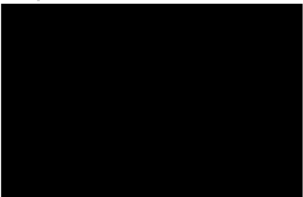
Several airstrips, in particular the airfield at Hexham and Stanton become inaccessible as there is no provision for a danger area crossing service.

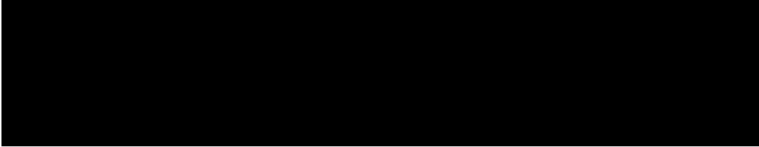
It is my understanding that in a previous trial, notamed areas were not cancelled when not in use. It is for this reason that I am particularly concerned that if the same occurs in this trial, many other users' enjoyment of a very large piece of airspace is curtailed quite unnecessarily and excess workload to the Newcastle controllers may be the result.

All airspace users should be able to work in harmony and no element be excluded from utilising the airspace for any individual type of activity.

I look forward to reading the feedback document and hope that we can all work together to do the right thing.

Please acknowledge receipt of this email and an assurance that my feedback will be considered.





I object strongly to the ACP as the TDA design completely fails to adhere to the CAA requirement to minimise impact on other air users. The impact will be huge and negative in every way.

It closes two grass airstrips which is grossly unfair and unnecessary, blocks the busy East Coast VFR coastal transit route under the Newcastle CTA, creates choke points thus causing 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 east coastline under the base of the 1500ft Newcastle CTA is currently a busy transit route for VFR GA traffic and also allows non-radio traffic to move freely. Little or no consideration appears to have been given to limiting any impact here, rather all decisions seem to be solely for the benefit of the company.

Area B

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. This hugely increases the risks and hazards for those using the route. **This will increase danger levels.**

The only option for non-radio traffic will be to head four miles out to sea, significantly increasing risk for these air users who are traditionally historic aircraft or basic microlights. **This will increase danger levels.**

Areas 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. This will be a huge negative impact on other air users particularly the local air users. It is unnecessary and it would seem little thought has been given to finding a compromise solution.

The design uses an 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. This is complete overkill and again, will have a negative impact on other air users. **This will increase danger levels.**

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 and will increase the risks and hazards in this area. **This will increase danger levels.**

DACS

Apian claims: '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'.

This decision is completely unacceptable. **This will increase danger levels.**

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. Apian should be seeking to resolve such issues with the interests of the local community of air users being one of their highest priorities.

Their suggestions show little or no knowledge of current air use and little or no consideration of the very negative impact their drone trial will have on local air traffic.

Historical TDA use

My above opinion is reinforced by previous Apian UAS operations in the Northumberland Coast area. 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. Instead, airspace remained needlessly blocked to other users despite it being unused by them for periods of time. Apian could have released airspace once it was clear operations were being suspended. This clearly backs up my view that the company has minimal regard for other air users.

In conclusion, the extensive nature of this TDA will severely and negatively impact other air users in Northern England. I believe this trial in this area is not currently viable and will only become so when certified Detect and Avoid Technology is available enabling co-existence rather than the implementation of such drastic measures via a TDA.

If this TDA option goes ahead the wider flying community is being hugely restricted and put at significant risk and danger which is totally unacceptable. **This will increase danger levels significantly.**

It is a very sad proposal for a private company to snatch airspace for a private venture that will impact so restrictively on local air users and increase the danger levels so significantly.

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.





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

1 message

4 October 2023 at 11:44

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 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 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 will make adjustments as a result of feedback we have received during the stakeholder engagement.

We will continue to re-evaluate the DACS and DAAIS requirements based on feedback from the aviation community and refinement of the airspace.

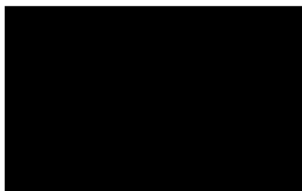
Apian was founded by two NHS doctors, and all of our work is focused on providing improved healthcare to our patients and clinicians. We are working directly with the Northumbria Healthcare NHS Foundation Trust, to provide an on-demand delivery service in the most rural NHS Trust in England. The airspace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

We have received valuable information like yours, from the GA community regarding flying routes used frequently in Northumberland. As a direct result of this feedback we will now undertake a period of review before communicating a revised TDA with stakeholders. We will include you in this communication and look forward to sharing this with you in the near future.

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 Mon, 18 Sept 2023 at 18:03, [Redacted] wrote:

Please find attached my response to this proposal.

I would appreciate confirmation of receipt.

Many thanks,

[Redacted]



[Airspace] TDA proposal near Newcastle

1 message



18 September 2023 at 20:32

Dear Apian.

It would be a great pity for aviation to introduce a Temporary Danger Area to the North and West of Newcastle. This change would negatively affect a whole range of airspace users, reducing transit corridors (and even effectively closing them at certain times when the visibility is lower), and closing some small airfields.

Should this TDA go ahead, routing north-south or vice versa along the coast under VFR on days with low cloud base would require pilots to extend their route out to sea, which at low altitude is unwise and potentially fatal in the event of engine failure. On such days, pilots would ideally fly close enough to the coastline that they could glide to shore if required to make an emergency landing. The TDA means that this is now longer possible.

The upper limits proposed are far higher than 400ft agl at almost all specific locations within the proposed area, which causes far more disruption than necessary to manned aircraft, given that UAVs fly at under 400ft agl.

Please reconsider the design of the TDA, or better still, drop the proposal altogether.

Best wishes,





Re: [Airspace] TDA proposal near Newcastle

1 message

4 October 2023 at 11:47

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 GA operations, and proves why stakeholder engagement is an important part of the process.

We have received valuable information like yours, from the GA community regarding flying routes used frequently in Northumberland. As a direct result of this feedback we will now undertake a period of review before communicating a revised TDA with stakeholders.

We will include you in this communication and look forward to sharing this with you in the near future.

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,
Aviation team
Apian

On Mon, 18 Sept 2023 at 20:32 [REDACTED]

Dear Apian.

It would be a great pity for aviation to introduce a Temporary Danger Area to the North and West of Newcastle. This change would negatively affect a whole range of airspace users, reducing transit corridors (and even effectively closing them at certain times when the visibility is lower), and closing some small airfields.

Should this TDA go ahead, routing north-south or vice versa along the coast under VFR on days with low cloud base would require pilots to extend their route out to sea, which at low altitude is unwise and potentially fatal in the event of engine failure. On such days, pilots would ideally fly close enough to the coastline that they could glide to shore if required to make an emergency landing. The TDA means that this is now longer possible.

The upper limits proposed are far higher than 400ft agl at almost all specific locations within the proposed area, which causes far more disruption than necessary to manned aircraft, given that UAVs fly at under 400ft agl.

Please reconsider the design of the TDA, or better still, drop the proposal altogether.

Best wishes,





[Airspace] Feedback on Apian Northumbria NHS Air Grid proposal

1 message

With reference to the [Apian Northumbria NHS Air Grid proposal](#), I would like to make my views known. I am lucky to have found out about this prior to the 22nd September deadline by a friend's Facebook post of all things. This shows inadequate stakeholder engagement has been conducted. It seems odd the airspace proposer is responsible for collecting feedback rather than an unbiased party, hence this email has been copied to the CAA Airspace Policy as a proxy for a proper consultation mechanism.

This is a massive airspace grab far in excess of that required to operate the drones. Insufficient consideration has been given for other airspace users. The proposal is wholly untenable due to the disruption that will be caused to all other airspace users.

The existing Newcastle controlled airspace is already a blocker to north/south movement and my experience is of almost always refusal of transit. This forces traffic to the east along the sea corridor below 1500'. The proposed danger area encroaches on this, and with drone area B reaching 1300' leaves a 200' slot below the 1500' controlled airspace base. This is not practically usable (consider the Take Take initiative) so inevitably pushes manned traffic further out to sea at low level. Area C to the west of Newcastle blocks transit to the west when the cloudbase is below ~2000'.

This proposal is simply not tenable in its current form. Suggested alternatives come to mind without much thought. I am sure the proposal could consider more innovative measures to minimise disruption to others while meeting their own needs:

- Arrange transit corridors within Newcastle's existing controlled airspace with ATC. CAT is not going to fly below 400' except directly on the extended runway centreline. To this end, a larger class D with a granted transit is far preferable to this large danger area without a crossing service.
- Reduce the danger area heights. The height of the danger areas is excessive given the height at which the drones intend to operate. Extended height coverage blocks transit of VFR traffic in periods of low cloud, and channels traffic into a small window in higher, but low level cloud.



Re: [Airspace] Feedback on Apian Northumbria NHS Air Grid proposal

1 message

4 October 2023 at 11:49

Dear [REDACTED]

Thank you so much for your email, we appreciate you reaching out to us and identifying yourself as a stakeholder. Despite our best efforts to capture all stakeholders, it can be challenging to reach those who are not on centralised distribution lists, and demonstrates 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.

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.

A copy of all the stakeholder feedback we have received will be sent to the CAA as part of our submission. This feedback will not be adjusted by the sponsor and will be available for you to view on the ACP portal when we submit. The feedback will be redacted to not share any personal information.

We have received valuable information like yours, from the GA community regarding flying routes used frequently in Northumberland. As a direct result of this feedback we will now undertake a period of review before communicating a revised TDA with stakeholders.

We will include you in this communication and look forward to sharing this with you in the near future.

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 Mon, 18 Sept 2023 at 21:50, [REDACTED] wrote:

With reference to the [Apian Northumbria NHS Air Grid proposal](#), I would like to make my views known. I am lucky to have found out about this prior to the 22nd September deadline by a friend's Facebook post of all things. This shows inadequate stakeholder engagement has been conducted. It seems odd the airspace proposer is responsible for collecting feedback rather than an unbiased party, hence this email has been copied to the CAA Airspace Policy as a proper for a proper consultation mechanism.

This is a massive airspace grab far in excess of that required to operate the drones. Insufficient consideration has been given for other airspace users. The proposal is wholly untenable due to the disruption that will be caused to all other airspace users.

The existing Newcastle controlled airspace is already a blocker to north/south movement and my experience is of almost always refusal of transit. This forces traffic to the east along the sea corridor below 1500'. The proposed danger area encroaches on this, and with drone area B reaching 1300' leaves a 200' slot below the 1500' controlled airspace base. This is not practically usable (consider the Take Take initiative) so inevitably pushes manned traffic further out to sea at low level. Area C to the west of Newcastle blocks transit to the west when the cloudbase is below ~2000'.

This proposal is simply not tenable in its current form. Suggested alternatives come to mind without much thought. I am sure the proposal could consider more innovative measures to minimise disruption to others while meeting their own needs:

- Arrange transit corridors within Newcastle's existing controlled airspace with ATC. CAT is not going to fly below 400' except directly on the extended runway centreline. To this end, a larger class D with a granted transit is far preferable to this large danger area without a crossing service.
- Reduce the danger area heights. The height of the danger areas is excessive given the height at which the drones intend to operate. Extended height coverage blocks transit of VFR traffic in periods of low cloud, and channels traffic into a small window in higher, but low level cloud.





[Airspace] Airspace

1 message



18 September 2023 at 22:01

I'm not against improvements or things moving forward.
But what is the need for a drone to fly above 500ft..?
There must be a way so that us pilots and drones can get along together ??

Regards



Sent from my iPhone



Re: [Airspace] Airspace

1 message



4 October 2023 at 11:53

bcc: airspace@apian.aero

Dear

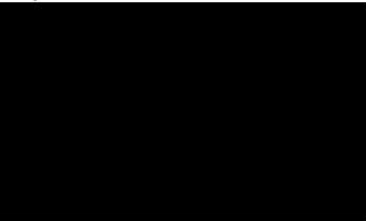
Thank you very much for responding with feedback to our proposal. We appreciate the time it has taken to read the material and the feedback you have provided.

Our UAS operator conducts all operations below 600ft AGL, and we are currently re-evaluating the airspace requested for operations to ensure that the minimum airspace is being requested. Details regarding the operational volume that must be provided around a UAS can be found in CAP772.

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

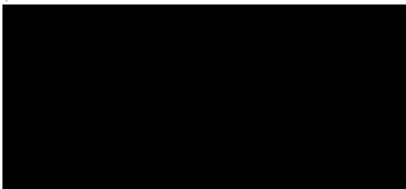
As a direct result of the feedback we have received, we will now undertake a period of review before communicating a revised TDA with stakeholders. We will include you in this communication and look forward to sharing this with you in the near future.

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 Mon, 18 Sept 2023 at 22:01, wrote:

I'm not against improvements or things moving forward.
But what is the need for a drone to fly above 500ft..?
There must be a way so that us pilots and drones can get along together ??



Name	
Email	
Representing	
Address	

Feedback.

I have reviewed the recent airspace proposal Apian have submitted for another drone transport trial and I am dismayed by both the scope and impact of the scheme and the total disregard for the impact on other airspace users. I have to 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 this issue rather than a disingenuous and misleading statement being offered.

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. 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 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 especially given government money funded by the taxpayer is being used for the trial. This money should be invested in developing avoid and detect technologies instead, which would negate the need for any TDA's in future.



Re: [Airspace] Northumberland TDA feedback

1 message

4 October 2023 at 14:36

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 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 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 will make adjustments as a result of feedback we have received during the stakeholder engagement.

We will continue to re-evaluate the DACS and DAAIS requirements based on feedback from the aviation community and refinement of the airspace.

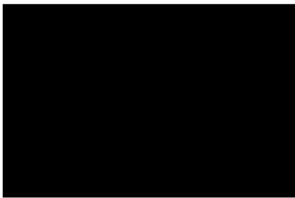
Apian was founded by two NHS doctors, and all of our work is focused on providing improved healthcare to our patients and clinicians. We are working directly with the Northumbria Healthcare NHS Foundation Trust, to provide an on-demand delivery service in the most rural NHS Trust in England. The airspace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

We have received valuable information like yours, from the GA community regarding flying routes used frequently in Northumberland. As a direct result of this feedback we will now undertake a period of review before communicating a revised TDA with stakeholders. We will include you in this communication and look forward to sharing this with you in the near future.

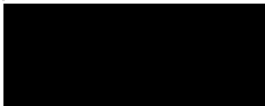
If you have any further questions or would like to schedule a meeting with either our healthcare or aviation team, please do not hesitate to contact us.



On Tue, 19 Sept 2023 at 06:52, [REDACTED] wrote:

To whom it may concern,

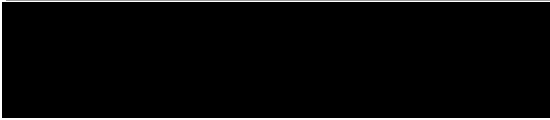
Please see attached my feedback to the proposed Northumberland TDA.





[Airspace] Drone testing in Northumberland

1 message



19 September 2023 at 09:44

To whom it may concern.

Just because you can does not mean you have to do!

Drone delivery of medicines to rural Northumberland has not been thoroughly thought through!

1 At the moment, cars or motorcycles drive to remote areas, deliver medicines and at the same time collect blood and other medical samples and return them to laboratories for checking.

2 Drones just deliver they don't pick up.

3 Hence cars and motorcycles will drive out to rural Northumberland empty to pick up medical samples for analysis.

4 The cost for 1 and 3 will be the same.

5 Hence the NHS if drones are used will have to pay twice.

6 Stealing all that "free" air space will have a catastrophic effect on general aviation in the North East of England. Flight training at Eshott and Athey Moors will probably be eliminated.

Who will pay for the drone experiment? The NHS? Use the money to get extra nurses to heal the sick.

It's a very silly idea thought up by a drone company that just wants to make money regardless of the real needs of the people.

They should go to the Ukraine and use their expertise to help sort the Russians out.

Regards



Sent from my iPad



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

1 message

19 September 2023 at 10:29



Hello,

The above trial has been brought to my attention by a Member of the Northern Farmers and Landowners Group (NFLG), which represents farmers and landowners across the North East.

The Member raised concerns over the possible impact of the drone activity on livestock within the operational area. Having read the trial document, I share these concerns.

The trial is no doubt an exciting development in the efficient delivery of health care in rural Northumberland and I welcome such developments. However, it is disappointing that it seems to give no consideration to the possible impacts on livestock within the trial area. This appears to be an unfortunate oversight given the nature of the farmland which will be over flown. The list of consultees also seems to lack farming interests.

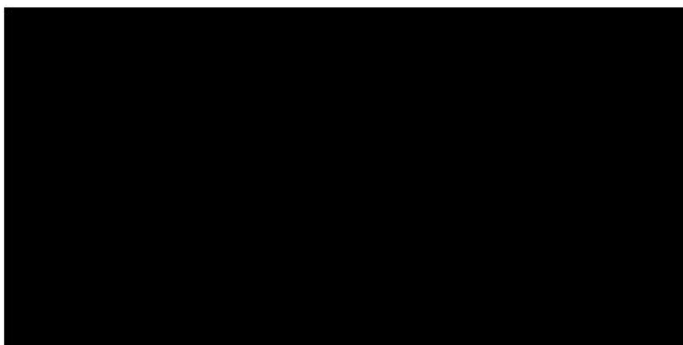
Small scale drones are well known to have adverse impacts on livestock, particularly cattle and horses. The scaring of such animals has the potential to cause financial loss through injury, but, possibly more importantly, it has Health and Safety implications. If cattle are being handled when spooked by a drone the consequences could be very serious indeed. The same applies to horses being handled or ridden.

I appreciate that the drones to be used in the trial are very different from the usual recreational/commercial hand operated drones, and that they will fly higher and straighter, so less likely to spook livestock beneath, but the same may not be true when approaching the destination.

I would request that any known impacts on livestock are included in the trial documentation, the trial is designed to minimise any possible impacts and that ongoing impacts are assessed as part of the trial.

Thank you.

Yours





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

1 message

5 October 2023 at 10:12

Dear [REDACTED]

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

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.

We have already received valuable information from the general aviation community regarding flying routes used frequently in Northumberland, and as a direct result of this feedback we will now undertake a period of review before communicating a revised temporary danger area (TDA) with those stakeholders.

The stakeholder engagement process will also involve us conducting public engagement of which we have already started in the local area, and we appreciate you reaching out to us as one of those stakeholders. We do not want to affect local businesses and understand your concerns for your livestock.

As you will see in the trial documentation in section 3.6, we have stated the noise levels expected from the UAS in certain aspects of the flight. These figures reflect the lower noise signature of a fixed wing UAS. We would welcome an opportunity to discuss your concerns in more detail. This would help us to share with you more information about our proposed operations, as well as support us in identifying any mitigations for our trials, and future operations regarding overflights of livestock.

Please let us know if this is something you would like us to organise.

On Tue, 19 Sept 2023 at 10:30, [REDACTED] wrote:

Hello,

The above trial has been brought to my attention by a Member of the Northern Farmers and Landowners Group (NFLG), which represents farmers and landowners across the North East.

The Member raised concerns over the possible impact of the drone activity on livestock within the operational area. Having read the trial document, I share these concerns.

The trial is no doubt an exciting development in the efficient delivery of health care in rural Northumberland and I welcome such developments. However, it is disappointing that it seems to give no consideration to the possible impacts on livestock within the trial area. This appears to be an unfortunate oversight given the nature of the farmland which will be over flown. The list of consultees also seems to lack farming interests.

Small scale drones are well known to have adverse impacts on livestock, particularly cattle and horses. The scaring of such animals has the potential to cause financial loss through injury, but, possibly more importantly, it has Health

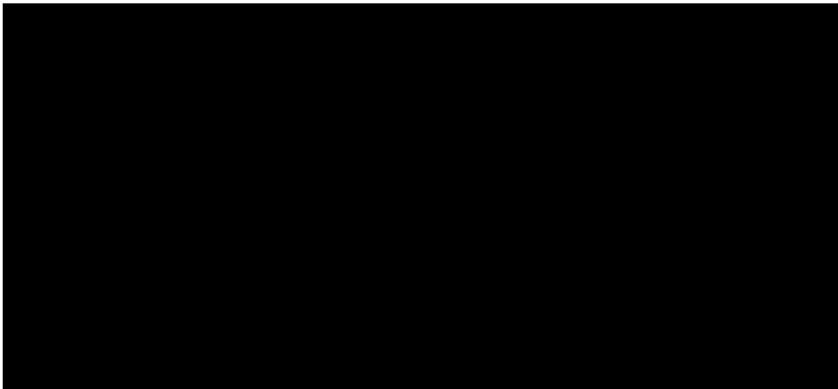
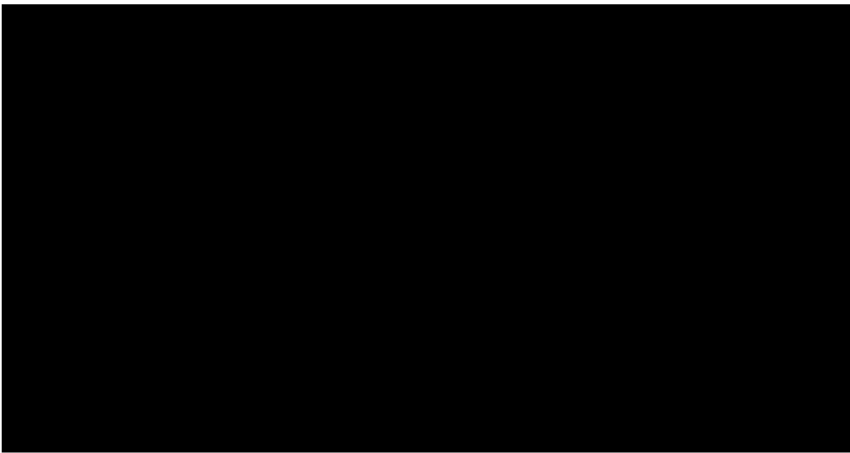
and Safety implications. If cattle are being handled when spooked by a drone the consequences could be very serious indeed. The same applies to horses being handled or ridden.

I appreciate that the drones to be used in the trial are very different from the usual recreational/commercial hand operated drones, and that they will fly higher and straighter, so less likely to spook livestock beneath, but the same may not be true when approaching the destination.

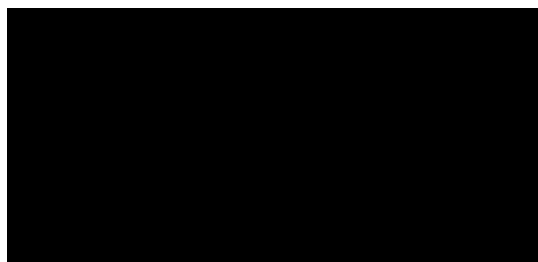
I would request that any known impacts on livestock are included in the trial documentation, the trial is designed to minimise any possible impacts and that ongoing impacts are assessed as part of the trial.

Thank you.

Yours



Name
Email
Representing
Address (including postcode if possible)



Feedback

I am part owner of a light aircraft based at Eshott airfield north of Morpeth. In my view the proposed TDA's will have a severe impact on general aviation in the area, and in particular will impact on our ability to fly to the south and the west. The proposal effectively blocks low level flying around the Newcastle CTA except when the cloudbase is high. In particular it will impact on extended trips south or west because of the fear of getting caught by the weather on the wrong side of this modern aerial "Hadrian's Wall".

Specific comments on the document

Annex B

3. Airspace Change proposal

As stated above, the changes proposed effectively create an aerial "Hadrian's Wall" for general aviation in Northumberland:

Area B

Effectively cuts off the coastal route to the east of the Newcastle CTA. The Newcastle CTA extends down to 1,500ft and the Area B up to 1,300ft leaving an unviable space for navigation. The alternative of heading out to sea to clear the CTA is not something I would contemplate in a single engined aircraft. It's not clear why Zone B needs to extend out over the sea at all – this seems to be to allow a considerable 'margin for error' for drone control?

Area C

Effectively cuts off the western route to the south around the Newcastle CTA and the route to the west up the Tyne Valley except for when the cloud base is in excess of 2,000ft, as well as impacting the airfields at Hexham and Stanton.

Area D

Adds to the impact of Area C in cutting off the route to the west up the Tyne Valley, as it blocks the space between the Spadeadam danger area to the north and the high ground to the south of the valley.

3.4 Airspace utilisation and 3.5 Measures to minimise the impact on other airspace users

It's impossible to visualise how these paragraphs can work when read together. The trial plan document talks repeatedly throughout the Introduction and Trial Overview about the

delivery of 'time critical', 'just in time', 'on-demand' medical items, with an average of 7 drone flights an hour. Apian then go on to say that the airspace will be deactivated when not in use and this will be done by NOTAM at least 24 hours before planned use.

How does an 'on demand' service that requires 24 hours notice work? In practice, given the business model described in the document, any deactivation by NOTAM looks impossible and this will lead to the TDA's always being active.

Para 3.5 also states that it is "anticipated that a Danger Area Activity Information Service (DAAIS) will be provided" and that details will be shared when available. As far as I am aware, this hasn't happened yet.

General points

The approach of taking the tallest feature in the TDA and then adding 600ft to get an AMSL that applies to the whole area seems excessive, and blocks much usable airspace. Is it not possible to look at more, smaller Areas to allow GA use of more of the airspace?

The impact of the current proposals will be for an increase in zone transit from Newcastle ATC as pilots seek to avoid infringing the TDA's, adding to the work load of Newcastle ATC at a time when regular closures due to staff shortages have been NOTAM'd

The impact of the local weather needs to be assessed – given our location there will regularly be periods where the coastal route is clear of cloud while the 'Hexham gap' route will be blocked by cloud and vice versa. This needs to be considered when looking at any alternatives to this initial TDA proposal.



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

1 message

4 October 2023 at 11:29

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 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 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 will make adjustments as a result of feedback we have received during the stakeholder engagement.

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.

Our work is looking to make improvements and innovate on the great services and support we currently have. We are always looking ahead to the challenges the NHS will face in the future and striving to be better, releasing staff time and identifying where the benefits are. With the continued resource pressures the NHS face, we believe that UAS can help to deliver improved healthcare for the Northumberland communities. This trial aims to demonstrate on-demand UAS delivery to trial and identify the impacts on the clinical service by augmenting the existing ground transportation networks.

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 we anticipate the TDA is not required during the trial we will cancel it as per the NOTAM process. Cancellations of TDA usage are due to daily limitations (e.g. weather, medical deliveries complete) therefore cancellations are not often seen in advance. This approach to TDA utilisation is 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 following feedback on our previous trial and are finalising details with the CAA of an improvement process.

We have received valuable information like yours, from the GA community regarding flying routes used frequently in Northumberland. As a direct result of this feedback we will now undertake a period of review before communicating a revised TDA with stakeholders. We will include you in this communication and look forward to sharing this with you in the near future.

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, 19 Sept 2023 at 10:50  wrote:

Please find comments on the attached feedback form.

Regards,





[Airspace] ACP-2023-015 Feedback

1 message

19 September 2023 at 17:21

To whom it may concern,

I wish to object in the strongest possible terms to Airspace Change Proposal ACP-2023-015. I am a pilot who regularly operates in the local area of this ACP.

Firstly I fundamentally disagree that the solution to flying these drones BVLOS is to create TDAs, this amounts to nothing short of the proverbial sledgehammer to crack a nut. Secondly, there is no provision of a danger area crossing service, which is utterly unbelievable for such an enormous TDA which covers such significant geographical areas, includes several airfields, and operates so close to a busy commercial airport. Thirdly, the airspace design of the proposed TDA is clumsy and inconsiderate of other airspace users at best or downright dangerous at worst. For example, determining the heights based on single highest features over substantial areas in the Tyne Valley will effectively block flights through this area during period of low cloud (a common local phenomenon in the valley), or blocking the highly used coastal route under the Newcastle Class D 'shelf'. Furthermore, blocking access to several local airfields and farm strips during these trials is totally unacceptable.

I hope this proposal is completely reconsidered, or ideally abandoned altogether.

Regards





Re: [Airspace] ACP-2023-015 Feedback

1 message

4 October 2023 at 11:22

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.

As previous air traffic controllers we have knowledge of and appreciate the restrictions you might face when flying. It can be challenging to gain data on GA operations, and getting a perspective from a pilot who flies in the local area is extremely important and proves why stakeholder engagement is an essential part of the process.

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.

We are continuing to re-evaluate the DACS and DAAIS requirements based on feedback from the aviation community and refinement of the airspace.

We have received valuable information like yours, from the GA community regarding flying routes used frequently in Northumberland. As a direct result of this feedback we will now undertake a period of review before communicating a revised TDA with stakeholders.

We will include you in this communication and look forward to sharing this with you in the near future.

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, 19 Sept 2023 at 17:21,  wrote:
To whom it may concern,

I wish to object in the strongest possible terms to Airspace Change Proposal ACP-2023-015. I am a pilot who regularly operates in the local area of this ACP.

Firstly I fundamentally disagree that the solution to flying these drones BVLOS is to create TDAs, this amounts to nothing short of the proverbial sledgehammer to crack a nut. Secondly, there is no provision of a danger area crossing service, which is utterly unbelievable for such an enormous TDA which covers such significant geographical areas, includes several airfields, and operates so close to a busy commercial airport. Thirdly, the airspace design of the proposed TDA is clumsy and inconsiderate of other airspace users at best or downright dangerous at worst. For example, determining the heights based on single highest features over substantial areas in the Tyne Valley will effectively block flights through this area during period of low cloud (a common local phenomenon in the valley), or blocking the highly used coastal route under the Newcastle Class D 'shelf'. Furthermore, blocking access to several local airfields and farm strips during these trials is totally unacceptable.

I hope this proposal is completely reconsidered, or ideally abandoned altogether.



[Airspace] Paracenders danger.

1 message

20 September 2023 at 18:58

Dear Apian,

What will you put in place to prevent mid air collisions, with,









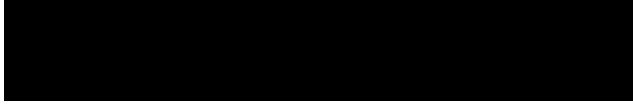
(retired)



[Airspace] TDA along Hadrians Wall

1 message

19 September 2023 at 18:12



Many microlighters, paracenders, 70kg aircraft will NOT be aware of the fact danger your unseeing aircraft poses to them.

We have all flown "see & be seen" since aviation began with the Wright brothers, your equipment appears to be unseeing.

Please rethink how you are about to endanger human beings.



(retired)



Re: [Airspace] TDA along Hadrians Wall

1 message

4 October 2023 at 11:25

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 feedback you have provided.

Firstly, as previous air traffic controllers, we want to assure you that safety is our priority. 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.

Under current regulations, we are required to apply for a TDA in order to safely operate this type of service. This provides a safety mitigation between aircraft and the UAS, as aircraft must be given a positive clearance to enter the TDA.

We would, however, 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 Tue, 19 Sept 2023 at 18:12, [REDACTED] wrote:

Many microlighters, paracenders, 70kg aircraft will NOT be aware of the fact danger your unseeing aircraft poses to them.

We have all flown "see & be seen" since aviation began with the Wright brothers, your equipment appears to be unseeing.

Please rethink how you are about to endanger human beings.

[REDACTED]
(retired)



[Airspace] Drone request Northumberland.

1 message

19 September 2023 at 18:39

In response to your proposal to transport materials utilising drones in the Northumberland region around Newcastle.

1. What seek and respond equipment will be carried by these drones? eg transponders, which may be interrogated by ATC and other air users?
2. What response is planned for in the eventuality of a potential collision between a drone and an aircraft, eg does the drone have a cut out and descent mechanism which would be activated when within 0.5 miles and 500' of a conflicting aircraft?
3. Will specific dates and times be Notammed, rather than blanket requests which would be in conflict with other airspace users?

My fear is that a drone will kill a GA pilot without these safeguards in place.

Yours,

Sent from my Huawei Mobile



Re: [Airspace] Drone request Northumberland.

1 message

4 October 2023 at 10:30

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.

Firstly, as previous air traffic controllers, we want to assure you that safety is our priority. 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.

Under current regulations, we are required to apply for a TDA in order to safely operate this type of service. This provides a safety mitigation between aircraft and the UAS, as aircraft must be given positive clearance to enter the TDA.

We would, however, 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

The UAS will be equipped with ADS-B in to provide the UAS operator with a picture of air traffic. We will continue to re-evaluate the DACS and DAAIS requirements based on feedback from the aviation community and refinement of the airspace.

We have received valuable information from the GA community regarding flying routes used frequently in Northumberland. As a direct result of this feedback we will now undertake a period of review before communicating a revised TDA with stakeholders. This includes the proposed operating hours.

We will include you in this communication and look forward to sharing this with you in the near future.

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, 19 Sept 2023 at 18:39 [REDACTED] wrote:

In response to your proposal to transport materials utilising drones in the Northumberland region around Newcastle.

1. What seek and respond equipment will be carried by these drones? eg transponders, which may be interrogated by ATC and other air users?
2. What response is planned for in the eventuality of a potential collision between a drone and an aircraft, eg does the drone have a cut out and descent mechanism which would be activated when within 0.5 miles and 500' of a conflicting aircraft?
3. Will specific dates and times be Notammed, rather than blanket requests which would be in conflict with other airspace users?

My fear is that a drone will kill a GA pilot without these safeguards in place.

Yours, [REDACTED], GA pilot and frequent user of this airspace.

Sent from my Huawei Mobile

British Microlight Aircraft Association

Apian ACP-2023-015 Feedback

Contents

Report Summary	2
Introduction	2
British Microlight Aircraft Association	2
BMAA Activities	3
BMAA Partner Organisations	3
What is a Microlight?	4
General BMAA Policy of Design Principles during ACP Engagement	5
Consultation	5
Airspace Classification	5
Access by GA	5
Airspace Volume	5
Justification	6
Airspace integration	6
Correspondence	6
ACP-2023-015 Specific Feedback	7
Necessity of Temporary Danger Areas	7
Lateral and Vertical Extents of Temporary Danger Zones.	7
Location and Duration of Trial	8
Danger Area Crossing Service	8
East Coast VFR Route Closure	9
Impacts to existing Airfields and their users.	11
Stanton Airstrip (Within TDA C)	11
Hexham Farm Airstrip (Within TDA C)	11
Athey's Moor and Eshott Airfields (outside TDA)	12
Currock Hill (Gliding Site)	12
General Comments	13
A solution looking for a problem?	13
Danger Areas – RAF Spadeadam	14
Conclusions	15

Report Summary

This report summarises the concerns of the British Microlight Association to the proposed Temporary Danger Areas (TDAs) around Newcastle airport and general objections to ACP-2023-015 as it stands. Key issues include (non-exhaustively):

- Closure of the East Coast VFR route pushing pilots further away from help in an emergency.
- The Blocking of the of the key coast-to-coast Tyne Valley GA Transit route when the cloud base is 2,000ft or less.
- The negative effects on multiple existing airfields, their resident users and associated businesses when covered by the proposed TDAs.
- The sheer volume of the proposed TDAs, their horizontal and vertical extents as well as misleading AGL labels.
- The interaction of these proposed TDAs, creating choke points with what is already a highly controlled and complicated volume of airspace.

Currently the BMAA does not think that this ACP abides with the key principles of CAP1616 that ‘relevant options have been devised with the input of those affected’ or that ‘...options have been properly assessed through the quality of the safety, operational, economic and environmental analysis’.

Whether ‘a thorough consultation on the chosen option’ will be carried out is yet to be seen but Apian’s responses and actions will inform this.

Whilst not directly within BMAA expertise we have also included some general comments on nearby GNSS jamming trials at RAF Spadeadam Electronic Warfare (EW) Tactics facility. Also, on why this solution is being pursued in a modern & developed country with strong existing infrastructure links.

Introduction

British Microlight Aircraft Association

Formed around 40 years ago the British Microlight Aircraft Association (BMAA) represents the interests of the membership, which includes microlight pilots and aviation enthusiasts in the UK.

The aims of the BMAA include:

- to act as the governing body for the microlighting in the UK;
- to act as the representative member for the UK in international affairs;
- to carry out functions delegated to it by other relevant bodies (e.g. the CAA);
- to promote, administer, and encourage the development of, and participation in microlight flying in the UK;
- to encourage the continued maintenance of standards of training and flying of microlights;
- to try to influence the rules, including national and international regulations, pertaining to the conduct of microlight flying for the benefit of the participants; and
- to encourage the continued maintenance of standards in the design, construction, and upkeep of microlight category aircraft.

The BMAA has almost 4000 valued members, yet around 30% of licence applications (i.e. additional microlight pilots and aircraft) are not members of the organisation.

With our members we form a substantial contribution to UK General Aviation (GA) and we engage routinely with the Light Aircraft Association (LAA)

BMAA Activities

Our activities include (non-exhaustively):

- **Airworthiness:** The BMAA is approved by the CAA to review new aircraft designs and approve them as compliant. As well as validate the on-going airworthiness of microlight aircraft. The Chief Inspector coordinates the activity of volunteer inspectors to help members keep their aircraft airworthy and also runs courses to help improve members' understanding and knowledge.
- **Flight Safety:** Flight Safety is of primary importance. The aircraft themselves are now inherently safe due to compliance with airworthiness standards. The BMAA Safety Officer promotes safe flying techniques and works with the Training Committee to continuously improve training standards and pilots' safety awareness.
- **Publications:** Each month a full colour magazine is sent to all members. The magazine has news items, reports on flights and aircraft, flight safety, events and contributions from the staff as well as a report on the activity of the BMAA governing Council.
- **Events and Competitions:** The BMAA holds several events throughout the year. The largest is the Popham Microlight Trade Show. We also host a National Open Series each year where Pilots fly tasks based upon precision navigation, fuel economy and accuracy.

BMAA Partner Organisations



The Royal Aero Clubs' principal role is to co-ordinate, promote and protect all forms of recreational and competitive air sport in the UK, and to represent UK air sport internationally.



The General Aerospace Safety Council (GASCo) was founded in 1964 to provide a forum in which all of the General Aviation organisations could meet to share safety information. GASCo is a Charity funded by its member organisations, pilots, aviation authorities and other generous contributors.



The GAAC is the most representative UK body in General Aviation and is recognised as such by Government, the CAA and others to be the organisation that speaks for General Aviation on planning and environmental issues.



The aim of the UK Confidential Human Factors Incident Reporting Programme for aviation, known by the acronym CHIRP, is to contribute to the enhancement of flight safety in the UK commercial and general aviation industries, by providing a totally independent confidential reporting system for all individuals employed in or associated with the industries.



The GA Alliance is an independent group and partnership of organisations representing UK GA, and Sports and Recreational Aviation interests (S&RA). Its objective is to promote and protect the cost-effective use aircraft, and their owners, pilots and the associated

operations, and to actively participate in the formulation of regulations and actions that may affect their interests so as to ensure the welfare and the free and safe movement of these aircraft, pilots, owners and the associated operations.

What is a Microlight?

There are three main categories of UK Microlights which are; Para-trikes, Flex-Wing and Three-Axis. These are designed to carry not more than 2 people in Visual Meteorological Conditions (VMC) only and they are further subcategorised by their age, Maximum Total Weight Authorised (MWTa) and stalling speed at maximum weight.



ParaTrikes (Powered Parachutes) have a ram-air or parafoil canopy below which a suspended wheeled power unit carries the pilot and passenger.

They are typically the least expensive form of microlight and offer the most flexible choice of take off and landing options but they also have the slowest cruise speeds.

Covering used and new aircraft price ranges from £2k – £20k



Flex-wing (Weight-shift) types consist of a delta wing similar to a hang glider with a 'trike' unit suspended underneath it.

Over the paratrikes they offer greater cruising speed but cost is increased and take off and landing options are slightly compromised.

Covering used and new aircraft price ranges from £2k – £75k



3-Axis (or Fixed-wing) type, 3-Axis refers to having control surfaces for Roll, Pitch and Yaw as in a conventional aircraft.

Covering used and new aircraft price ranges from £6k – £180k

General BMAA Policy of Design Principles during ACP Engagement

The following text describes the underlying principles that the British Microlight Aircraft Association (BMAA) believes must be followed by applicants for airspace change proposals. The BMAA is concerned that the applicant for ACP-2023-015 has not fully complied with all these principles.

Consultation

- The BMAA welcomes the opportunity to engage in consultation at an early stage within the ACP CAP 1616 process.
- Sponsors are encouraged to engage with the BMAA and its members as early as possible during the development of the ACP. Previous ACPs have missed the opportunity for early engagement and dialogue resulting in significant and costly delays.

Airspace Classification

- The BMAA considers that the UK airspace's default classification as Type G and that sponsors must establish a safety case for proposing to change this class or add any further restrictions or requirements by their ACP.
- All sponsors must demonstrate that alternatives have been considered such as RMZ and TMZ before considering controlled airspace.
- Where Class E is proposed, without a TMZ or RMZ should be considered as the default option.

Access by GA

- Sponsors must accept the assumption that GA including sporting and recreational aviation is entitled to continued safe use of airspace and that commercial aviation does not have a right to limit airspace access.
- Sponsors should ensure that there will be measures to allow flexible use of airspace and prepare for the wider use of electronic conspicuity devices and interoperability with existing e-conspicuity, e.g. FLARM and Pilot Aware etc...

Airspace Volume

- In line with the principles of the Airspace Modernisation principles the ACP must respect the requirement for minimum airspace volumes designed for efficiency and reduced environmental impact. These principles will include:

- Minimum size of controlled airspace
- Minimum number of departure/arrival routes
- Steeper and continuous climbs and descents for cost and environmental benefits as well as minimisation of CAS footprint.

Justification

- Sponsors must conduct and present proper analysis of overall airspace safety changes i.e. based on modelling and evidence rather than purely subjective opinion.
- Sponsors must provide proper validation of forecast traffic levels. There is an expectation that data used, particularly forecasts, will be verifiable including details of any and all assumptions.

Airspace integration

- Sponsors must show how they are integrating their proposal within the overall UK airspace modernisation context, for example proposals which do not connect efficiently between upper and lower airspace (potentially under different airspace "management") would only inhibit overall airspace efficiency and therefore not receive our support)
- Optimisation of the development work above and below the 7,000ft NATS en-route split.

Correspondence

The [REDACTED] can be reached directly via e-mail at:

[REDACTED]

Or by post:

[REDACTED]

ACP-2023-015 Specific Feedback

The British Microlight Aircraft Association has significant concerns with ACP-2023-015 as it stands. The following sections cover each aspect in detail after which there is a general comments section for miscellaneous observations.

Necessity of Temporary Danger Areas

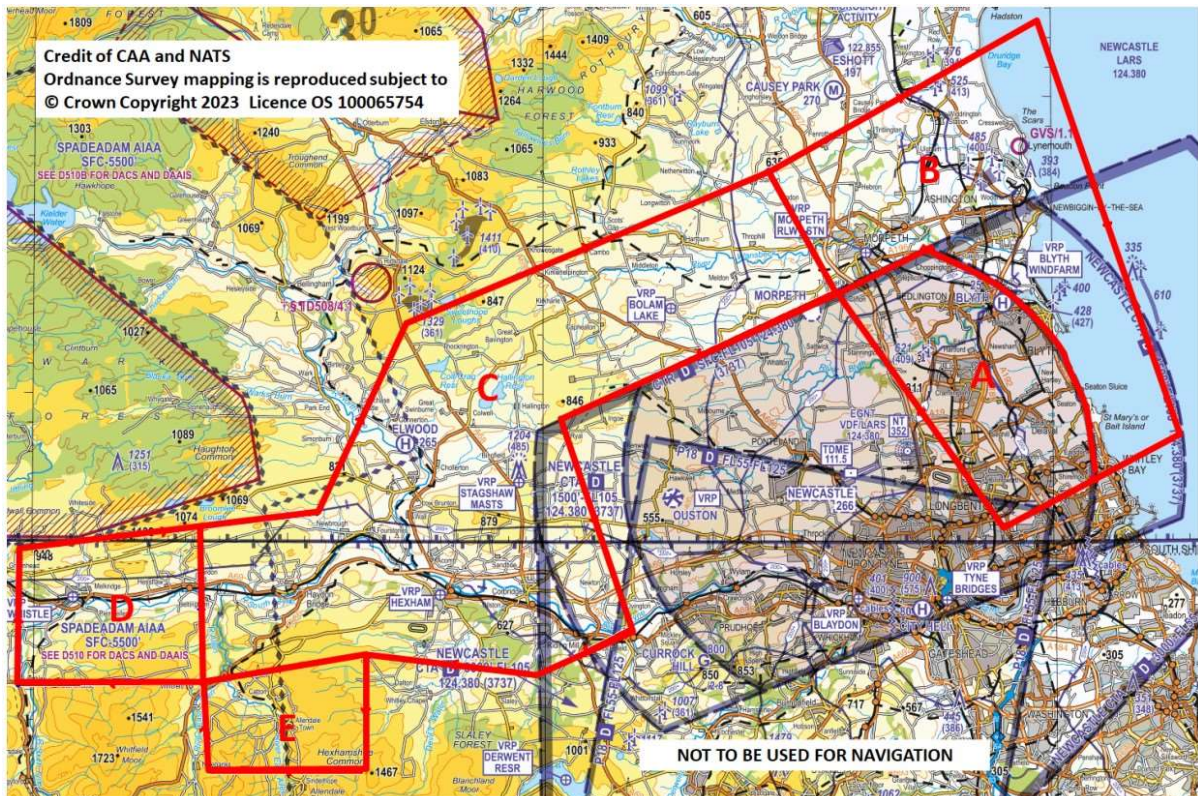
Ziplines' drones are reported by Apian to have 'Detect and Avoid' technology, it is the BMAAs opinion that the System/Technological Readiness Level (S/TRL) of 'Detect and Avoid' should be matured first and foremost if drones are to share the air with human pilots.

Mature 'Detect and Avoid' technology would remove the need for large swathes of airspace to be removed via Temporary Danger Areas (TDAs), it would also provide further redundancy to fallible Electronic Conspicuity (EC) & Global Navigation Satellite Systems (GNSS) as well as sharing the burden of 'visual' identification other air users with existing pilots.

It has been reported that the drones used in this trial lack Automatic Dependent Surveillance–Broadcast (ADS-B) 'Out' and only possess very limited range 'In'. Where EC is used this is the most common form in the UK and has been widely pushed by the Civil Aviation Authority (CAA) as the EC technology of choice for microlight pilots.

It is possible for Apian to accelerate the development of detect and avoid technologies so that TDAs can be eliminated?

Lateral and Vertical Extents of Temporary Danger Zones.



Combined the Temporary Danger Areas (TDA) represent an unacceptable limitation of airspace for existing users. Even individually they still pose added inference and complexity with what is already tightly controlled airspace between Newcastle airport and the Spadeadam and Otterburn danger areas (D510B & D512B respectively to the north).

Large restrictions of airspace such as this create choke points outside of the TDAs increasing the risk of collision for existing users of the air. TDA B & C are very problematic, especially if used in tandem.

Can Apian elaborate on the chances of all TDAs being used at once? Our default position is that the skies should be open as in type G airspace but could large zones such as TDA C & B be subdivided further to more accurately reflect 600ft AGL?

Local weather effects complicate this further. It is noted that the vertical extents of the TDAs stated as 600ft AGL are misleading, within Area D for example the TDA top is 2,000 ft AMSL above the key coast-to-coast Tyne Valley transit route and much higher than 600 ft AGL along the valley – Above Haltwhistle it extends to around 1,500ft AGL.

The size of the TDAs implies immature guidance technology, is it possible for Apian to reduce the size of the TDAs proposed?

Location and Duration of Trial

Is it possible that the drone trial could be conducted somewhere less populated and in less congested airspace until the maturity of detect and avoid technology has been increased to the state that TDAs are no longer required?

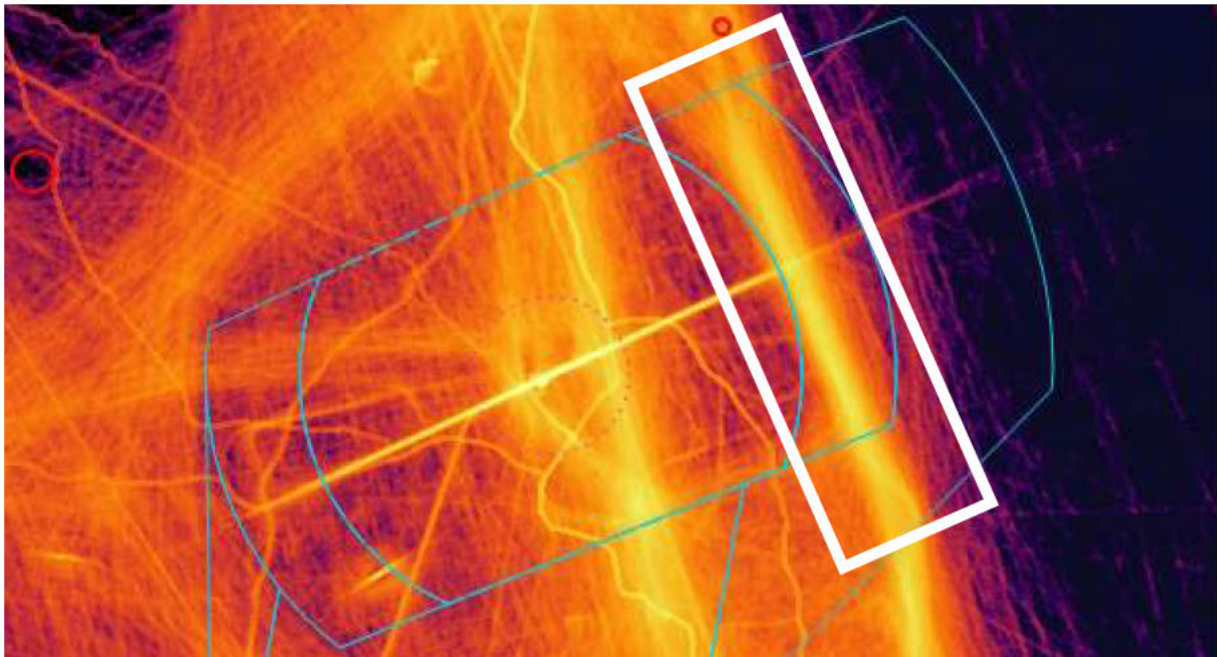
This would also negate many of the impact of the trial more so due to the trial potentially making airspace unavailable for 6 months.

Indeed CAP1616 states that trials should only be up to 90 days in duration except in 'extraordinary circumstances' – we do not believe that this trial meets this criteria and the trial should be limited to 90 days.

Danger Area Crossing Service

Apian claim "Due to the heights of the proposed TDA complex (600ft 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.

East Coast VFR Route Closure



To the east of the Newcastle Airports Controlled Area (CTA) is the 'East Coast Visual-Flight-Rules (VFR) Route', shown within the white box in the above 'flight heat map'.

As evidenced by the above heat map, the east coastline under the base of the 1,500ft Newcastle CTA is a busy transit route for VFR GA traffic and also allows non-radio traffic to move freely.

Apian TDA B (SFC-1300ft) blocks this route and will force east coast traffic to seek a zone transit with Newcastle Air Traffic Control (ATC). Public sources of information state that Newcastle ATC dealt with over 31,000 aircraft movements in 2022. This would only increase with the closure of the East Coast VFR route.

Additionally, the only options for non-radio traffic will be to either divert West around the Apian TDAs and the Spadeadam and Otterburn danger areas, this is a distance of approximately 180 nautical miles (18x that of the sea route) or to head further out to sea, significantly reducing the chances of a successful forced landing or successful rescue out at sea. This is further complicated by

a line of wind farms running north to south 3NM abeam of Blyth at the proposed boundary of the TDA B.



Apart from the potential closure of the vital East Coast VFR route, the heat map also illustrates the significant amount of traffic around Newcastle airport which will be affected by all TDAs proposed by Apian.

Impacts to existing Airfields and their users.

Several existing airfields are completely covered or in close proximity to the proposed TDAs, and will suffer various consequences of the trial as currently proposed.

Stanton Airstrip (Within TDA C)



Stanton Airstrip would be forced to close under the current TDA proposals. We do not feel this fits into the spirit of 'limiting impact to existing air users'. This would force hangared residents to relocate with loss of farm income.

Hexham Farm Airstrip (Within TDA C)



Hexham Farm Airstrip (located to the south of Hexham Race course) would be forced to close under the current ACP proposals, we do not feel this fits into the spirit of 'limiting impact to existing air users'. This would force hangared residents to relocate with loss of farm income.

Athey's Moor and Eshott Airfields (outside TDA)



Athey's Moor is an airstrip outside the proposed TDAs to the north. It has been established since 2001 and is also home to Athey's Moor Flying School. It is a thriving hub of pilots, aviation enthusiasts and student pilots.

Eshott is a significant GA airfield with around 50 resident aircraft and a flight training school.

Although outside of the TDA, the proposed TDAs will substantially limit the availability of safe training for solo student flights that routinely use the Tyne Valley for cross country flights to Carlisle and Kirkbride.

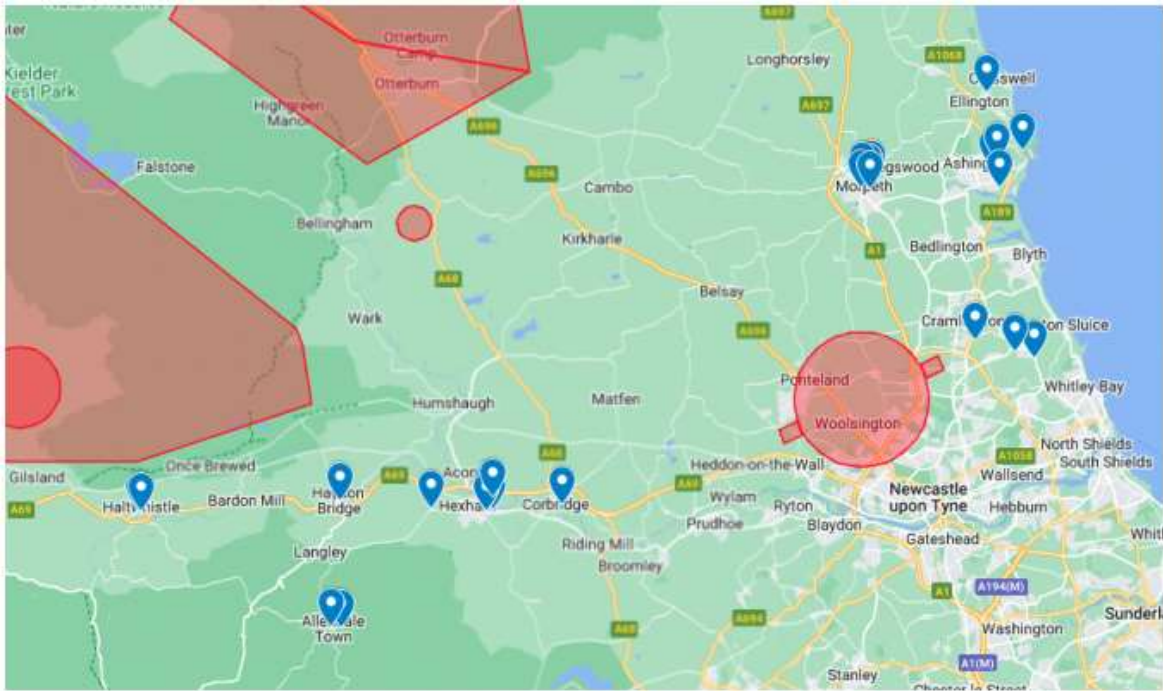
Currock Hill (Gliding Site)



TDA areas C and E close off airspace to the West of Currock Hill gliding site and reduce options for pilots. Gliders are unpowered and therefore are subject to environmental conditions to a greater extent and cannot always easily gain height. As such, powered aircraft are required to give way to gliders, there is no reason drones should be any different in this regard, which is why Detect and Avoid technology is critical.

General Comments

A solution looking for a problem?



The UK has very good road infrastructure – It can be seen that the majority of proposed stage 2 delivery sites chosen by Apian (denoted by the blue pins) are along existing A roads (A69, A169 & the A1).

Apian documentation states that the Zipline drones to be used in this trial helped with ‘last-mile transportation challenges’ with Covid-19 vaccinations in Ghana and Nigeria. Whilst this is to be commended this ‘last-mile transportation’ problem simply does not exist to the same level in the UK. Complete road links exist for all sites bar perhaps Allendale during inclement weather (but it is not necessarily the case that a drone would fly in this weather either).

Public sources state the ‘Zipline Platform 1’ drone can only carry a payload of 1.8Kg. This does not make sense compared with the capacity of existing Internal Combustion Engine (ICE) vehicles or Electric Vehicles (EV). Respectively a Ford Transit ICE can carry 1,335 kilos and a Rivian Electronic Van 1,224 kilos. Around 700 drones are required to replace the carriage capacity of 1 delivery van.

Blood Bikes are a common sight on the road and can typically carry 3 x 10Kg racks on the back of the bike. This is 15x the capacity of a zipline drone. Even when understanding volume rather than weight may be a greater consideration for delicate medical supplies, a greater proportion of volume will no doubt be required to protect these medical supplies from a parachute drop from height than delivered by hand on a ‘blood’ bike.

The National Association of Blood Bikes made over 162,000 runs in 2021; given the inferior carriage capacity of a drone the sky would have to be flooded 450,000 drones to match this capacity.



Danger Areas – RAF Spadeadam

RAF Spadeadam is the only Electronic Warfare (EW) Tactics facility in Europe where aircrews can practice manoeuvres and tactics against a variety of threats and targets that they face in contemporary warfare.

EW trials routinely include Global Navigation Satellite System (GNSS) jamming which includes the Global Positioning System (GPS). GNSS/GPS signals are crucial in correct drone navigation.

Has the Apian trial safety case examined the potential impact of GPS jamming activity in the adjacent D510 (Spadeadam Electronic Warfare Tactics Range) which is in line of sight of the drone trial? This could also impact the safety of Commercial Air Transport operating from Newcastle Airport. Is it a good idea to conduct the trial in close proximity to a base involved in Electronic Warfare?