

Stakeholder Engagement Plan

ACP-2023-061

27th Sept 2023

This Stakeholder Engagement Plan aims to identify the relevant aviation stakeholders as set out in CAPI616 1B 317, laying out the methodology of gathering and considering their views. These stakeholders will be included in the targeted stakeholder engagement for ACP-2023-061.

This document will be shared with the CAA to allow review and guidance where possible, however the document will not be approved by the CAA. This document will be added to the Airspace Change Portal for information only.

Project summary

Operations are proposed to be conducted between 12th February 2024 - 12th August 2024 as part of the CAA's BVLOS airspace sandbox trial. The sandbox tests the CAA's airspace policy concept ([CAP2533](#)) and the London Health Bridge has been selected to participate. The UAS will operate between Guy's Hospital and St Thomas' Hospital with the operation conducted in a Trial Temporary Reserved Area (TRA). Apian has begun the airspace change request ([ACP-2023-061](#)) to establish the Trial TRA. A map of the proposed Trial TRA can be found below, and a detailed map of the Trial TRA dimensions will be shared with the stakeholders listed in this document, and uploaded to the airspace change portal.



Figure 1 – Possible operational flight area

Audience

As per CAP1616 1B 317 *‘the sponsor must demonstrate to the CAA that it has carried out targeted engagement with aviation stakeholders (specifically, that is airspace users, air navigation service providers and airports only) to establish that the trial will be safe and operationally viable’.*

The audience for the engagement on this trial airspace change has been compiled through discussions with the CAA, considerations of the National Air Traffic Advisory Committee (NATMAC) list of organisations/stakeholders and prior knowledge of relevant stakeholders through Apian’s experience from past airspace change requests.

When considering the aviation audience for engagement, Apian have used the location and dimensions of the TRA to identify aviation stakeholders which will be either impacted by the TRA or will benefit from being part of the engagement process due to proximity to the TRA location, nature of operations, aviation organisation scope etc. The TRA has been designed not to impact helicopters using the H4 Helicopter Route so specific users of that route will not be part of the engagement. This is considered proportionate as the TRA does not impact H4, a NOTAM will be issued when the TRA is active and Open category flights can be conducted in controlled airspace below 400 ft AGL without prior stakeholder engagement.

Aviation stakeholders and those identified in ground areas have been outlined as the following;

- Other airspace users
 - Civilian helicopter operations which may require entry into the TRA
 - Network Rail
 - Emergency Services (Helicopter Emergency Medical Service (HEMS), National Police Air Service), Maritime and Coastguard Agency(MCA))
 - Defence Airspace and Air Traffic Management for military operations (DAATM)
 - London Metropolitan Police - are responsible for the authorisation of access to R157, approval will be required to operate within that area
 - Port of London Authority
 - Drone operations
 - Network Rail
 - London Metropolitan Police
 - London Fire Brigade
- Aerodromes/Airports
 - London Heliport
- Air Navigation Service Provider (ANSP)
 - NATS provides an Air Traffic Service to aircraft operating within the London area, they are also responsible for approval of the Non-Standard Flights within the London area.

NATMAC

Apian aims to engage with all those on the NATMAC list who may be impacted by the proposed TRA. We therefore analysed the complete NATMAC list and assessed whether each member should be included in the engagement. The decision was made not to engage the following NATMAC members for the following reasons.

- **Passenger and commercial airlines operating at altitudes above TRA.** The ceiling of the TRA is below airline operating levels and will therefore not impact the operations of commercial airlines.
 - Airlines UK
 - British Airways
 - Heavy Airlines
 - Low Fare Airlines

- **Military Organisations.** Apian has already begun engagement with DAATM and has been asked to complete all military engagements through them. Therefore we will not engage with the following
 - Military Aviation Authority (MAA)
 - Navy Command HQ
 - United States Visiting Forces (USVF) HQ United States Country Rep-UK (HQ USCR-UK)
- **General Aviation associations.** There are a number of GA associations who do not conduct operations within the London TMA, therefore they will not be included in the stakeholder engagement. We will therefore not engage with
 - Aircraft Owners and Pilots Association (AOPA)
 - British Balloon and Airship Club (BBAC)
 - British Business and General Aviation Association (BBGA)
 - British Gliding Association (BGA)
 - British Microlight Aircraft Association (BMAA)
 - British Skydiving
 - General Aviation Alliance (GAA)
 - Light Aircraft Association (LAA)
- **Operators who do not operate in the region of the TRA.**
 - Isle of Man CAA does not operate near London and therefore will not be impacted by the proposed TRA.
- **Airport operators' association groups.** Apian is engaging directly with NATS. We will therefore not engage with
 - Airport Operators Association (AOA),
 - Airfield Operators Group (AOG),
 - British Air Line Pilots Association (BALPA)
 - Guild of Air Traffic Control Officers (GATCO)
- **Strategic industry bodies.** There are members of the NATMAC who have a specific or strategic rather than operational purpose. These groups will not be engaged as they will not be impacted by the proposed TRA.
 - Airspace Change Organising Group (ACOG),
 - Aviation Environment Federation (AEF)
 - BAE Systems
 - Honourable Company of Air Pilots (HCAP)
 - PPL/IR (Europe)
 - UK Flight Safety Committee (UKFSC)

All NATMAC members that will be engaged with.

- ARPAS-UK – Association of Remotely Piloted Aircraft Systems
- UK British Helicopter Association (BHA)
- Drone Major
- Helicopter Club of Great Britain (HCGB)
- Ministry of Defence – Defence Airspace and Air Traffic Management (DAATM)
- NATS
- UK Airprox Board (UKAB)

Note – The proposed TRA does not impact the H4 Helicopter Route so Apian is not planning engagement with helicopter operators that use the route. However, the BHA and HCGB have been included in this engagement list to ensure there are no other civilian, non-emergency helicopter flights that could take place in the area of the TRA.

Approach and materials

The approach is to engage directly with the stakeholders identified above, contacting them directly via email and/or telephone. We have separated them into 3 categories. Feedback, comments and/or suggestions relating to the safety and operational aspects of the proposal will be requested from these groups.

- **Stakeholders where procedures will be agreed**

There is a group of stakeholders who Apian will communicate with while the TRA is in place and the operation is ongoing. Procedures will need to be agreed in advance for this communication and the input of these stakeholders on the procedures and TRA design is vital for safe operations. These stakeholders are;

- NATS
- Emergency Helicopter Services and Military operations (Maritime and Coastguard Agency, London's Air Ambulance and other HEMS, NPAS, DAATM) who may need to task aircraft into the TRA at short notice.
- MOD (DAATM)
- London Metropolitan Police (for access to RI57)

These organisations have received virtual briefings for the proposed TRA, with a request for a dialogue to discuss procedures for operations within the areas of interest noted above.

- **Aviation stakeholders where direct feedback is important**

There are a group of stakeholders who may utilise the airspace of the TRA or have their operations impacted by the TRA. They are;

- All helicopter operations within the proposed operating area (Network Rail)

- Other (VLOS) drone operators
 - Network Rail
 - London Metropolitan Police
 - London Fire Brigade
 - Association of Remotely Piloted Aircraft Systems UK (ARPAS-UK)

Apian will send briefing slides to these organisations explaining the proposed operation and TRA and ask for their feedback. Apian will offer video/telephone calls should the stakeholder prefer.

- **Stakeholders where feedback is important**

There are a group of stakeholders who may not require to use the airspace of the TRA or will not be impacted by the TRA, but may have an interest in the operations.

They are;

- Drone Major
- Helicopter Club of Great Britain (HCGB)
- UK Airprox Board (UKAB)

Apian will send briefing slides to these organisations explaining the proposed operation and TRA and ask for their feedback. Apian will offer video/telephone calls should the stakeholder prefer.

Engagement Period

The target AIC publication date is the 8th February 2024. To achieve this target publication date, we have agreed to submit our proposal to the CAA by the 24th November 2023.

Considering the above and the need to provide the CAA with sufficient time to assess the temporary airspace change application, stakeholders will be contacted on the 6th Oct 2023 and given until the 17th November 2023 to respond, providing 6 weeks for feedback. Apian believes that given the pre-application stakeholder engagement that has already taken place in the area, 6 weeks would provide sufficient time for engagement due to its targeted nature. Should any stakeholders request an extension to the feedback window, Apian will address this and respond accordingly.

Post engagement

Following the stakeholder engagement process detailed above, Apian will gather the feedback from different stakeholders and consider whether any modifications to the proposal are required prior to formally submitting an Airspace Change Request to the CAA for approval.

Following CAA decision

CAP1616 1B 318 states *'If a live operational trial is permitted by the CAA, the trial sponsor must next identify and inform the full range of stakeholder groups that the trial will be taking place.'*

Apian will submit a public engagement plan outlining the stakeholder groups who will be informed of the trial, subject to approval by the CAA.

These will include;

- **Aviation groups**
 - Targeted aviation stakeholders
 - Wider aviation community
- **Government bodies**
 - Local Councils (City, Lambeth, Southwark and Westminster)
 - NHS Trusts
- **General Public**
 - General public
 - Patients/Staff of Hospitals

These groups will have the opportunity to provide feedback throughout the Trial. Details of how this will be provided will be outlined in the public engagement plan.

Feedback while TRA is active

If the trial is approved, it shall be the responsibility of the Airspace Lead at Apian to gather all feedback received when the TRA is in place. All stakeholders in this document shall be notified of the contact details to provide feedback.

Appendix A: London aviation stakeholder engagement (pre-submission)

Organisation	Reason	Communication	Discussed proposal
ANSPs			
NATS	Provides ATC for airspace Support for access to restricted areas and approvals	<ul style="list-style-type: none"> • Apian/NATS/UAS operator workshops conducted • NATS part of project team (through Apian resource) 	Y
Military			
Defence Airspace and Air Traffic Management (DAATM)	<ul style="list-style-type: none"> • Military aircraft operate within airspace (RAF helicopter landing sites within London TMA) • Proximity of RAF Northolt (LAA based here) • Operational access to area of operations may be required in an emergency • Authorised below 500ft if required • Letter or Agreement or SLA may be required 	<ul style="list-style-type: none"> • Apian have briefed DAATM on the proposal, awaiting formal response after they have spoken to units that might be affected. 	Y
Helicopter Operations in the area			

London Heliport	<ul style="list-style-type: none"> Proximity to operational area 	<ul style="list-style-type: none"> Apian meeting conducted 17 April. Outside London Heliport area of control, no issues with GSTT Informed we would keep them involved in stakeholder engagement to ensure they are aware. 	Y
Network Rail	<ul style="list-style-type: none"> Information only as proximity of rail lines Periodic surveys may be completed 	<ul style="list-style-type: none"> Apian has regular communications with Rikke Carmichael Information to be shared when details confirmed 	Y
London Metropolitan Police/NPCC	<ul style="list-style-type: none"> Authorised below 500ft if required Security awareness 	<ul style="list-style-type: none"> Apian have briefed them on proposal, supportive and will update when details confirmed Currently confirming R157 process for multiple days 	Y
NPAS	<ul style="list-style-type: none"> Operational access to area of operations may be required in an emergency Letter or Agreement or SLA may be required 	<ul style="list-style-type: none"> Discussed with NPAS drone lead Discussed with Chief Pilot Both confirmed supportive 	Y
London Air Ambulance (+ other HEMS)	<ul style="list-style-type: none"> Operational access to area of operations may be required in an emergency Authorised below 500ft if required Letter or Agreement or SLA may be required (KSS suggest SLA agreement coordinated through LAA) 	<ul style="list-style-type: none"> Apian briefed deputy COO of LAA Supportive and will put Apian in touch with flight operations when details confirmed Provided data of landings within operational area for previous 2 years May need access quickly due to retasking Data provided from local hospitals of helicopter operations 	Y

JRCC/MCA	<ul style="list-style-type: none"> Potentially may require operational access to area of operations may be required in an emergency Authorised below 500ft if required Letter or Agreement or SLA may be required (unlikely if NOTAM has details on) 	<ul style="list-style-type: none"> Apian have coordinated previously with MCA and therefore have established relationship Discussed London GSTT route, no issues from their side, would not expect to operate in that area Information to be shared when details confirmed 	Y
Other			
Hospitals - GSTT	<ul style="list-style-type: none"> Hospitals within operational area Patient and Public Involvement and Engagement (PPIE) 	<ul style="list-style-type: none"> GSTT partners in the project PPIE will be conducted part of healthcare plan (Apian lead) 	Y
Hospitals - RLH, KCH, St George's & St Mary's	<ul style="list-style-type: none"> Hospital operations all within close proximity Cross over with HEMS 	<ul style="list-style-type: none"> Apian has started discussions with hospitals More information to be shared when details confirmed 	Y
Home Office (Counter Drones Unit)	<ul style="list-style-type: none"> Operations within London 	<ul style="list-style-type: none"> Apian briefed Home Office Counter Drone Unit lead Linked to London Met/NPAS Coordination through London Met 	Y

Appendix B: Acronyms and abbreviations

The following acronyms and abbreviations have been used in this document. Acronyms and abbreviations only used once and explained for that usage have not been included.

Acronym or abbreviation	Meaning
ACP	Airspace change proposal
AIC	Aeronautical Information Circular
ANSP	Air Navigation Service Provider
ARPAS-UK	Association of Remotely Piloted Aircraft Systems United Kingdom
ATC	Air traffic control
BVLOS	Beyond visual line of sight
CAA	Civil Aviation Authority
CAP	Civil Aviation Authority publication
COO	Chief Operating Officer
DAATM	Defence Airspace and Air Traffic Management
DfT	Department for Transport
GA	General aviation
GSTT	Guy' and St.Thomas' National Health Service Foundation Trust
HEMS	Helicopter Emergency Medical Service
JRCC	Joint Rescue Coordination Centre
KCA	King's College Hospital
KSS	Kent Surrey and Sussex
LAA	London Air Ambulance
MAA	Military Aviation Authority
MCA	Maritime and Coastguard Agency

MOD	Ministry of Defence
NATMAC	National Air Traffic Advisory Committee
NATS	National Air Traffic Services
NHS	National Health Service
NPAS	National Police Air Service
NPCC	National Police Chiefs' Council
NOTAM	Notice to aviation
OA	Operational Authorisation
PPIE	Patient and public involvement and engagement
RAF	Royal Air Force
RLH	Royal London Hospital
SLA	Service-level agreement
TMA	Terminal control area
TRA	Temporary Reserved Area
UA	Uncrewed aircraft
UAS	Uncrewed aircraft system
UKFSC	United Kingdom Flight Safety Committee
UTM	Uncrewed aircraft system traffic management
VLOS	Visual line of sight