



ACP 2022-203 Final Submission

Nov 2023

Appendix 2

Stakeholder Summary

1 Stakeholders and Engagement

1. The CAA CAP 1616 includes the requirement for Sponsors to engage with aviation stakeholders and relevant stakeholders and give due consideration to the potential impacts of the change on airspace users. The proposal is subject to those requirements for a temporary change (trial) as detailed in CAP 1616. This section provides a summary of the stakeholder engagement exercise that CAELUS completed between 23 May 23 and 1 Oct 23 to allow stakeholders to comment on the design and operational proposal.

1.1 Methodology

2. The stakeholder engagement plan below sets out the way in which CAELUS identified the relevant aviation stakeholders and anyone else who the proposed changes may impact and sets out how CAELUS gathered and considered their views.

1.2 Identification of Stakeholders

3. Stakeholders engaged were those CAELUS considered to be directly affected and potentially impacted as well as those would have an interest in the ACP. The method by which these were identified were through a combination of the experience from CAELUS 1 proposal, experience from ACP 2022 – 101, consideration of the NATMAC list, advice from the CAA during the Assessment Meeting and advice from PIK ANSP who hold considerable knowledge and understanding of the airspace users. It was assessed that no additional stakeholders had been identified.
4. The stakeholders can be broken down into the following:
 - a. Aerodromes in the immediate vicinity
 - b. GA airfields, clubs and unlicensed sites
 - c. Emergency services
 - d. Other localised aviation stakeholders
 - e. Other non-aviation stakeholders
 - f. GA excluding Emergency Services
 - g. Other helicopter operators including emergency services
 - h. National Defence and Safety Critical Organisations

i. Other suggested stakeholders

5. The NATMAC list as provided by the CAA was assessed and the decision was made not to engage with the following NATMAC members for the following reasons:
6. Military Organisations. Engagement with DAATM had taken place for ACP 2022-101 and so the decision was made to keep the approach for military input via DAATM who had historic knowledge of the CAELUS proposals and is the single point of contact for Defence. The decision was therefore made not to engage with the Military Aviation Authority (MAA), United States Visiting Forces (USVF), HQ United States Country Rep-UK (HQ USCR-UK), or Navy Command HQ.
7. Passenger and Commercial airlines have not been contacted due to the low level operations of the TDA and any impact to operations will be managed via Prestwick ATC operations.
8. Other industry bodies. It was decided that Airspace Change Organising Group (ACOG), Honourable Company of Air Pilots (HCAP), Aviation Environment Federation (AEF), hold a strategic purpose and will not be impacted by the proposed ACP.
9. Isle of Man CAA does not operate in the region and will not be impacted by the ACP and therefore was not included in the engagement.

1.3 Stakeholder material

10. On the 24 May 23 each of the stakeholders detailed at section 1.2 above were contacted via email from a dedicated engagement email address (caelus2airspace@traxinternational.co.uk).

Where appropriate the email contained reminders of previous engagement from the first phase of CAELUS and previous introductory briefings regarding CAELUS 2 but asked for their consideration for this particular ACP. A stakeholder briefing pack was attached to the email in PDF format for review and initial responses were requested by 11 Jun 23 to enable any concerns to be addressed prior to the engagement window closing on 2 Jul 2023. An opportunity for the stakeholder to reply with questions and or confirmation that they had no

objections were given, along with an invitation for an online meeting/call should it be felt required. The initial N2 stakeholder engagement pack is found at Annex A.

11. During the Assessment Meeting and the subsequent timeline, it was proposed that the timeline for engagement ran from 15 May 23 to 26 Jun 23. This timeline was adjusted to the engagement window closing on 2 Jul 23 to account for the delay in the start of the stakeholder engagement. The email sent to the stakeholders asked for initial feedback by 11 Jun 23 to allow for two-way engagement on any issues that should arise. Given the stakeholders previous engagement with the CAELUS project, the nature of the airspace and the limited flight and duration it was felt that 6 weeks was a proportionate engagement window. Should any of the stakeholders have requested an extension to the feedback window that this would be addressed and responded to accordingly. During the engagement window and after initial feedback was received a further iteration of the stakeholder briefing pack was sent via email detailing the changes made (see further detail below) and asking for any final comments by 5 Jul 23. The amended stakeholder briefing pack can be found at Annex B.

12. The initial stakeholder engagement material detailed a flight trial window from 22 Sep to 22 Dec 23. As part of the development of this ACP and in order to mitigate the impact of the temporary change on other airspace users, it is intended that Prestwick ATC (PIK) provide a Danger Area Crossing Service (DACs). In order to achieve this there was significant engagement with PIK for the preparation of a Hazard Identification Workshop (HAZID) in order to support the Temporary Operating Instruction (TOI) to support the provision of the same. Owing to the timeline for the work to underpin this the original timeline for the ACP was unachievable and a new agreed timeline with the CAA was published on the portal on 14 Sep. This revised timeline provided for a flying window between Jan and Jun 24. Stakeholders were re-engaged on the new timeline, together with minor updates to the TDA co-ordinates and the provision of the DACs as well as the period of operations. This engagement took place by way of email together with a revised stakeholder engagement pack. The final stakeholder pack can be found at Annex C.

1.4 Level of engagement

13. Overall, the level of engagement was positive with all stakeholders identified. A number of emails were exchanged, Teams called held and in some instances stakeholders were visited in person. The engagement can be summarised in the following table:

Table 1: Stakeholder Summary

Sponsor	Initial Email Response	Revised Proposal Response	Additional Engagement – see below	Agreement
Aerodromes in Immediate Vicinity				
PIK Airport	Yes	Yes	Provision of DACS discussions	No objections
GA Airfields, Clubs and Unlicensed Sites				
Prestwick Flight Centre Ltd	No	Yes	Reply to address concerns – see section 2 B	Would prefer earlier in 2024 but no objections
Prestwick Flying Club	Yes	Yes	Reply to address concerns – see Section 2 B	DACS requested but no objections
Air Training Corps	No	No	None – see Section 2 C	No response received
Kilkerran Airfield	Yes	Yes	No impact to operations – see Section 2 A	No impact to operations
Bute Airfield	Yes	Yes	Reply to address concerns – see Section 2 B	Revised proposal agreed
Scottish Aero Club (Perth)	No	Yes	Reply to address concerns – see Section 2 B	Requested lower ceiling height which has been accommodated as far as possible
Strathavan Airfield – see BMAA below	Yes	Yes	Reply to address concerns – see Section 2 B	Revised proposal agreed
SMPC	No	No	None – see Section 2 C	No response received
Emergency Services				
Police	No	Yes	No impact to operations – see Section 2 A	No impact to operations
GAMA	Yes	Yes	Reply to address concerns – see Section 2 B	Agreement with revised TDA design
SCAA	Yes	Yes	Included with Babcock Engagement	Revised proposal agreed
Bristow	Yes	Yes	Reply to address concerns – see Section 2 B	Revised proposals agreed
OHS Rescue	Yes	No	No impact to operations – see Section 2 A	No impact to operations

Babcock	Yes	Yes	Reply for additional clarifications – see Section 2 B	No impact to operations with DACS provision
Other Aviation Stakeholders				
Turnberry Heliport	No	No	None – see Section 2 C	No response received
Malin Court Heliport	No	No	None – see Section 2 C	No response received
Ayr Racecourse Heliport	No	No	None - see Section 2 C	No response received
Warrix Flying Group	No	No	None – see Section 2 C	No response received
Arran Heli Landing Site Project	No	No	None- see Section 2 C	No response received
Other Non-Aviation Stakeholders				
Ayre	Yes	Yes	No objections – see Section 2 A	No objections
Arran War Memorial Hospital	Yes	Yes	No objections – see Section 2 A	No objections
University Hospital Crosshouse	Yes	Yes	No objections – see Section 2 A	No objections
GA Excluding Emergency Services				
ARPAS UK	Yes	Yes	Reply for additional clarifications – see Section 2 B	Supportive of operations with DACS provision and ADSB provision. Have requested access to TDA when not used by CAELUS – advised unable to do so.
PPL IR Europe	No	No	None- see Section 2 C	No response received
Royal Aero Club	No	No	None- see Section 2 C	No response received
BMFA	No	No	None – see Section 2 C	No response received
BBGA	Yes	Yes	No concerns – see Section 2 A	No concerns
BHA	No	No	None – see Section 2 C	No response received
AOPA	Yes	No	Reply to address concerns – see Section 2 B	Email sent addressing concerns – no further response received
Airspace4All	No	No	None – see Section 2 C	No response received
GASCO	No	No	None – see Section 2 C	No response received ¹
GAAC	Yes	Yes	Initial engagement received but no objections registered – See Section 2	Email sent inviting further comments but no objections or comments received.
Drone Major				
GAA	No	Yes	Reply to address concerns – see Section 2 B	Concerns addressed – no clear final position – suggested that their individual members would comment where necessary
Airfield Operators Group	No	Yes	No comments – see Section A	No comments or objections

¹ Separate email to the CAA with details of stakeholder engagement

Airport Operators Group	No	No	None – see Section 2 C	No response received
British Balloon and Airship Club	No	No	None – see Section 2 C	No response received
BGA	Yes	Yes	No comments – see Section 2 A	No comments or objections
BHPA	Yes	Yes	No comments – see Section 2 A	No comments or objections – highlighted some additional info
BMAA (inc Strathavan)	Yes	Yes	Yes – see Section 2 B	No objections to this ACP but do not agree that TDAs are the solution to integration
British Skydiving Association	No	No	None – see Section 2 C	No response received
Helicopter Club of Great Britain	No	No	None – see Section 2 C	No response received
LAA	No	Yes	Additional engagement to answer queries – see Section 2 B	Concerns addressed – no clear final position although Strathavan identified as main area of interest - Strathavan agreed to final proposals
Emergency Services National				
Falkirk Fire Services	No	Yes	No concerns – see Section 2 A	No concerns
Scottish Ambulance Services	No	Yes	No concerns – see Section 2 A	No concerns
Police Scotland	No	Yes	No concerns – see Section 2 A	No concerns
GNAA	Yes	Yes	Additional engagement for discussion of DACS	No concerns with availability of DACS as mitigation
MCGA	No	Yes	No concerns – see Section 2 A	No concerns
PDG Helicopters	Yes	Yes	Additional engagement to discuss commercial impact – see Section 2 B	No concerns with availability of DACS as mitigation
2Excel	Yes	No	Additional engagement to discuss operating parameters – see Section 2 B	No concerns with minimal impact to operations identified
National Defence				
MoD (DAATM)	Yes	Yes	No concerns with proposal – see Section 2 A	No concerns
BAE	No	No	None	No response received
UKAB	No	Yes	No comments received	No response received
UKFSC	No	No	None	No response received
NATS	Yes	Yes	No impact	No concerns
Other Proposed Stakeholders				
BALPA	Yes	Yes	Additional engagement to discuss operating parameters – see Section 2 B	No concerns with revised operations

Mayfield Farm	Yes	Yes	Additional engagement – see Section 2 B	No concerns with revised operations
Scotia Seaplanes	Yes	Yes	Additional engagement – see Section 2 B	See Prestwick Flight Centre

The above table demonstrates that from the 58 stakeholders identified 34 stakeholders after initial or additional engagement had no objections or were supportive of the ACP. There were no replies from 20 of the stakeholders. Out of the 4 remaining stakeholders, 3 stakeholders were sent correspondence addressing their points but no final position was received and 1 stakeholder requested an amendment to the TDA that could not be accommodated. Further details of those stakeholder who were subject to additional engagement can be found in Section B below together with information as to how their comments influenced the TDA design or operations. Section A contains details of those stakeholders who replied with either comments of support, no impact or no concerns. Section C contains details of those stakeholders from whom no response was received.

1.5 Stakeholder Response Summary

Section A

- The following stakeholders replied with either confirmation of support, no comments to make or no impact to operations. These stakeholders will be informed of the outcome of this ACP and should it be successful will be engaged, where the request has been made, prior to commencement of operations.

Prestwick ATC
Kilkerran Airfield
Strathaven Airfield
Police Scotland
OHS Rescue
Ayr Hospital
Arran War Memorial Hospital
University Hospital Crosshouse
BBGA
AOG
BGA

BHPA
Falck Emergency Services
Scottish Ambulance Service
NPAS
MCGA
2Excel
DAATM
NATS

Section B

15. The following stakeholders were subject to additional engagement. Each stakeholder is identified below with a brief summary of the engagement and whether their input was used to inform the final TDA design together with confirmation as to whether the engagement reached a mutually agreeable solution. A summary of the reasons for the additional engagement is highlighted at table x and shows that the provision of a DACS to facilitate the TDA crossing, minor adjustments to the TDA lateral and vertical designs were the key elements. All these points have been addressed in the final design which the details of the changes made set out at the end of this document.

Stakeholders who raised points that were incorporated into the final design

16. Prestwick Flying Centre Ltd
This organisation have raised a preference for the trial to be conducted as early as possible within the window Jan – Jul as their operations slow considerably during the winter months. The organisation raised concerns over the ability for PIK to offer a DACs. The organisation's representative also raised an objection (writing on behalf of Scotia Seaplanes) based on priority with their customers travelling to undertake week long courses and requested information for mechanism for compensation to the short-term, high-value, high-net worth clients.

A response was sent addressing the above concerns with an agreement that the operations would take place as early as possible within the proposed flying window. It is felt that Mar would still be considered earlier in the flying window. Confirmation was sought as to the concerns over the provision of the DACS so that they could be addressed in more detail.

The area of operation for Scotia Seaplanes was highlighted as being some distance away from the TDA and therefore it was felt that it would not be impacted but additional information was sought of example flight tracks. No further response was received from the stakeholder.

The feedback was not used to change the dimensions of the TDA but reinforced the need for a robust DACS provision.

17. Prestwick Flying Club

This organisation raised questions with regards to the provision of a DACS and access to the airspace as well as asking for confirmation of how this ACP supported demonstration of safe operation in a segregated environment.

A response was sent detailing the discussions taking place for the provision of a DACS from PIK, clarification of the operating minima and confirmation that the NOTAM would be cancelled as soon as possible should it become clear that any of the flights would not be taking place. Further detail was also given with regards to the Concept of Operations supporting the trial and therefore the integration of airspace users.

The above stakeholder feedback was used to inform the implementation of an operating limitation of 1500ft based on Prestwick METAR and confirm the importance of a robust DACS.

18. Bute Airfield

This stakeholder forwarded a comprehensive note in response to the ACP initial TDA design and raised a number of points. The shape and size of the TDA was considered as an issue given the width of the corridor and the frequency of Crosshouse hospital as a VFR. The procedures for the operation of the TDA was raised as was the upper dimensions of the TDA and whether it could be further segmented. The ability of the EC capabilities of the platform was questioned as was the ability of PIK to support a DACS. Finally, access to airspace, including that of a local landowner, was raised.

Given the wide range of the points raised and some of the complexities of the same it was felt that a Teams call would be most appropriate way to move matters forward. A successful conversation was had attended by Bute airfield and members of the CAELUS consortium.

A summary of the conversation was sent to the stakeholder, including responses to the original feedback highlighting the provision of the DACS, an intended redesign of the airspace to incorporate operating limitations, a slight amendment to the repositioning of the route and further information regarding the platform.

The redesign of the airspace was submitted to the stakeholder who confirmed by email that their primary concerns have been addressed and therefore had no objections to the proposal. The stakeholder requested to be included in further ACP flight trials under the project.

19. Scottish aero Club

The stakeholder requested confirmation as to the rationale behind the upper ceilings of the TDAs and highlighted the impact of VFR traffic transiting north – south west of Prestwick. A response was sent to explain the rationale behind the requirement of the upper ceilings of the TDA design and an acknowledgement with regards to the operating limitations of VFR traffic. Confirmation was received from the stakeholder regarding the indicative operating altitude of the RPAS platform which was responded to.

This feedback was used to inform the requirement to operate only when the cloud base is at 1500ft or more.

20. GAMA

Correspondence was exchanged with the stakeholder regarding the required access to the local area should the need arise in the event of a helicopter responding to an emergency. Telephone conference calls have been established together with emails detailing the weather minima requirements, local area of operations, timings for response etc. The SAR operators commented on the risk of icing and a potential need to descend into the TDA should the conditions not be as per the PIK METAR. Should the helicopter require Low Level Decent due to icing then this will be given the priority by PIK and access will be managed accordingly.

These discussions have culminated in an agreement for an LOA that will incorporate GAMA, PIK and Skyports and it is agreed that, together with the DACS, that this provides adequate mitigation for operations.

21. SCAA

Correspondence took place via Babcock who are the aviation operators. Whilst an invitation was sent to include the stakeholder in an emergency services call to discuss the route and operations the stakeholder was unable to attend short notice. The presentation was forwarded to the stakeholder and their main point to note is the need for a robust crossing service.

This stakeholder information was used to inform the need for a robust DACS provision.

22. Bristow SAR

Bristow SAR highlighted the need for access to the TDA in the event of their aircraft being tasked with an emergency operation, a CAT A flight. The stakeholder also asked for information regarding deconfliction from other aircraft, the lighting to be displayed on the RPAS platform and a protocol should the need arise to land at Ayr Hospital if the RPAS was on the ground at the same location.

A comprehensive reply with an initial response was sent to the stakeholder and, given the complexity of the questions raised, an offer of a dedicated Teams session was offered. A summary of this meeting was forwarded to the stakeholder on the 15 Jun.

A revised version of the TDA was also sent with a concise explanation of the key changes including revised upper limits of the TDA and weather limitations as well as the provision of a DACS. The stakeholder confirmed that there was no issues with the revised TDA proposal.

23. Babcock (Police Scotland)

Given the nature of the stakeholder and the importance of the emergency services accessing the airspace, Babcock were sent the stakeholder material together with an invitation to attend a Teams call to discuss the same.

The representative was unable to attend but did respond to the revised TDA design. The stakeholder commented that given the distance to the TDA from their operating base there should be sufficient time for access to the TDA to be granted. The introduction of the

weather limitation was welcomed. A final clarification point with regards to the daytime operations was sought and this was clarified by return.

The stakeholder engagement was used to inform the requirement for the weather limitation and the need for a robust DACS provision.

24. ARPAS-UK

This stakeholder originally replied with full support to the ACP but on re-engagement with the revised TDA design provided support on the basis that three conditions were met, namely; a DACS to be provided, other drone operators to have access to the TDA when the CAELUS system is not in any particular sector and that the CAELUS RPAS utilises ADSB In and Out.

A response was sent to the stakeholder to advise them that engagement was ongoing with PIK for the provision of the DACS and that this was subject to approval and that the CAELUS RPAS would be equipped with a transponder capable of ADSB In and Out and Mode S. With regards to the access to the TDA for other drone operators, it was explained that the airspace would be approved for the use of the CAELUS drone only for BVLOS operations and invited VLOS operators to contact the CAELUS RPAS operators on the specific day to confirm the activity on the day or in the short term.

This stakeholder feedback was used to inform the need for a robust DACS provision.

25. BALPA

BALPA reached out to CAELUS to discuss the ACP proposal in detail including comments surrounding the location of the TDA and the proximity to Prestwick airspace, the risk of pilots not reading NOTAMs to understand the airspace in place and the benefits of the NHS use case. Given the complexity and wide range of comments a Teams call was established to discuss. A follow up email prior to the conference call from the stakeholder confirmed that they could see the merit in the route to across to Arran with the main concern being inadvertent penetration by other airspace users.

Following the Teams call a summary of the discussion was sent to the stakeholder. It was felt that it was a beneficial discussion with CAELUS partners being afforded the opportunity to discuss the project further and the airspace proposals and BALPA were able to share

their local knowledge together with their thoughts. Most of the discussion focused on local procedures. It was agreed that the conclusion was BALPA does not have any issues with the overall scope of the project as discussed, they do have concerns with the general principle of UAV's in controlled airspace and they welcomed the opportunity to positively interact with the project.

With the updated proposals sent to the stakeholder the comment received concluded that the changes provided a sound based for a trial and the weather limits combined with the new routing would help mitigate the any conflicts with GA traffic inadvertently infringing the approach path. Furthermore, in the capacity as a local flying instructor the stakeholder concluded that the redesign of the TDA and the weather limits would mitigate the concerns over the radio failure in special VFR issue.

The stakeholders feedback was welcomed and the local knowledge helped inform the revised TDA design and operating procedures.

26. Mayfield Farm

This stakeholder was identified as a local stakeholder who had a private airstrip and sometimes operated light aircraft from the same. Initial efforts via email and post proved unsuccessful. A telephone number was obtained and a call was placed to discuss the engagement material sent. Initially the stakeholder objected to the ACP proposal and felt that this could be done elsewhere. An opportunity was requested to speak with the stakeholder in person to explain the proposal in more detail and to understand the mitigations that could be put in place. The stakeholder confirmed that they would welcome this opportunity and arrangements were made for a CAELUS partner from NATS to attend the stakeholder in person. The concerns regarding the stakeholder having access to airspace were noted and taken to a discussion with Prestwick ATC. An agreement was reached by which arrangements would be made to ensure that the stakeholder could operate during the flight trial should they so wish. The procedures were set out and detailed the stakeholders ability to identify times for departure or arrival to the airstrip and CAELUS would create a gap in the flying programme to accommodate their needs. The information was sent to the stakeholder and further opportunity to discuss was offered should it not be a fair reflection of what had been agreed.

This stakeholders feedback was used to inform the procedures around the operation of the airspace.

Stakeholders who raised feedback but did not affect the final design

27. AOPA

This stakeholder raised a question regarding the moving of operations towards integration as well as the business case for the NHS versus the inconvenience to other airspace users. A response was sent highlighting the incorporation of the feedback from other aviation stakeholders and emphasising that the changes being made were to ensure that GA operations can continue safely for this TDA which only has an intended duration of 4 weeks of operation.

Further information was given regarding the Concept of Operations and how CAELUS is seeking to inform the move towards integration. Additional information was given regarding the intended movements for the CAELUS trial also.

The stakeholder feedback did not change the TDA design or operations of the same as it related to the strategic requirement for both the TDA and the long term intention for integration.

28. GAA

Initial feedback was not received from this stakeholder but an email response was received following the re-engagement and also the CAELUS attendance at the RAF Lossiemouth RAUWG. The feedback contained in the email from the GAA dated 18 Sep related to the CAELUS project as a whole rather than the individual ACP or routing contained therein. The GAA held a view that the ACPs do not move towards integration and that there are a number of ACPs that do not share lessons identified. Furthermore it was felt that too many ACPs were ill defined, that ACP sponsors do not appreciate the activities that take place in Class G airspace, that there are no mitigations for VFR UK Class G users for TDAs, that DACS and DAAIS proposed is ignorant or disingenuous. The stakeholder proposed that the flights take place during official night and outside existing drone FRZs, confirming that the further away the proposed flights are from night, the greater the objections will be.

A response was sent to the stakeholder discussing the blanket objection to ACPs for TDAs to enable BVLOS activity and undertaking to liaise with the CAA with regards to the question of DACS and DAAIS provision but reiterating that it was felt that DACS and DAAIS provision does provide some mitigation to the concept of a TDA. A response was received from the CAA and forwarded to the stakeholder.

Further engagement was received from the stakeholder welcoming the provision of the DACS and the more seasonal weather window. The topic of weather was raised by the stakeholder including queries regarding how many times the weather would disrupt the operations, comments on the 1500ft weather limitation and the bird risk. A response was forwarded to provide further detail in response to the disruption due to the weather query, a further explanation with regards to the 1500ft cloud base and an acknowledgement and thanks for raising the bird risk issue and confirmation that it would be included in the relevant risk assessments.

The stakeholder comments have been noted and have been considered in the context of this particular ACP. It is felt there is no change required above and beyond the changes already developed.

29. BMAA inc Strathaven Airfield

BMAA provided a detailed response to the stakeholder engagement which incorporated objections based on integration, the provision and availability of a DACS by PIK, the safety of a national network with no design principles, the threat of continuation bias for drone integration, the assumption of EC being based on ADSB and Mode S and the use case for NHS needs via drone delivery.

Given the nature and number of the points raised it was agreed with the stakeholder that a Teams call would be set up to discuss the same. A meeting was arranged and the points raised in the email were discussed. It was felt that it was a productive discussion which allowed the CAELUS team to answer the questions raised but also the stakeholder the opportunity to expand on the points contained in their initial feedback. Whilst the engagement did not change the design of the TDA it highlighted where sensitivities lay in the BVLOS operations and the impact to other Class G users and how CAELUS could ensure continued engagement with such stakeholders as the trial moves forward.

The stakeholder was forwarded the revised TDA stakeholder engagement pack and they confirmed that they have no objections. Whilst the BMAA's official policy position is that TDAs are not the solution to integration in Class G. Therefore they cannot *support* your proposal but they do, however, recognise that the CAA only appear to be offering TDAs as an option at the moment. In this instance, therefore, they do not oppose the ACP.

30. LAA

An response was not received after the initial engagement window but upon re-engagement the stakeholder raised questions regarding the airspace design, the economic benefit to the NHS, notification of cancellation of flights and emergency procedures. The LAA also raised the need to liaise with Strathaven airfield.

A response was sent to the stakeholder to explain that the revised design and inclusion of the 1500ft cloud based was based on stakeholder feedback and had a positive response to date. With regards to the economic benefit to the NHS, it was explained that this forms part of the trial itself and the aircraft capabilities will develop over time. The design of the RPAS platform was explained and an explanation of both the cancellation of the NOTAM and that there is an emergency procedure relating to the drone in place also. No further correspondence was received from the stakeholder.

Whilst the engagement did not change the design of the TDA it highlighted where sensitivities lay in the BVLOS operations and the impact to other Class G users and how CAELUS could ensure continued engagement with such stakeholders as the trial moves forward.

31. PDG Helicopters

PDG Helicopters conduct heavy lifting operations at low level and initially intended to join a briefing session. Unfortunately, they could not attend but they read the stakeholder information and were party to feedback from other stakeholders. Their position was one which had no objections on the basis that the means of communicating the activity of the TDA was robust and that there was a facility for short-notice access to the area to mitigate commercial impact. A separate telephone conversation was held to discuss, during which it was agreed that CAELUS would continue to communicate the planned operations to allow strategic deconfliction should it become necessary, otherwise a DACs would be utilised

where possible. After receiving the revised documentation in Sept the stakeholder confirmed that they had no additional comments to make.

32. General Aviation Awareness Council

After initial engagement emails and GAAC highlighting the need for the organisation to be able to comment on proposed changes that may affect airfields no specific comments or objections were made in reference to this particular ACP. The revised stakeholder information pack was sent to the stakeholder together with a reminder but no response was received.

33. Drone Major

After initial engagement with the stakeholder with regards to a conversation nothing further was heard despite reminders and the updated stakeholder information packs being sent

Section C

The following stakeholders did not provide a response to either the initial stakeholder feedback, the revised stakeholders packs sent or reminders. It is not felt that any of the organisation will have a significant impact on, or be significantly affected by the ACP.

Air Training Corps

SMPC

Turnberry Heliport

Malin Court Heliport

Ayr Racecourse Heliport

Warrix Flying Group

Arran Helicopter Landing Site Project

PPL IR Europe

Royal Aero Club

BMFA

BHA

GASCO

AOA

British Balloon and Airship Club

British Skydiving Association

Helicopter Club of Great Britain

BAE

UKAB

UKFSC

2 Summary of Changes made following engagement

34. Following initial stakeholder feedback a further design of the TDA was undertaken and incorporated into an updated stakeholder feedback pack found at Annex B to this Appendix. The changes were highlighted to include the location of the Ayr-Crosshouse route, the design of the TDA segmentation, the AMSL ceiling and implementation of weather restrictions to increase the airspace available to support the safe transit of all airspace users above the TDA.
35. Further modifications were included in the final TDA design (which as been submitted in the Final Submission Document) which was sent to stakeholders to also inform them of the delay to the flying window. The slight amendments to the airspace design were included in order to align the design with the existing permanent airspace structures and confirmation of the DACS provision from Prestwick Airport. This stakeholder engagement pack can be found at Annex C to this document.

3 Informing stakeholders

36. CAELUS undertakes to engage with stakeholders post the decision of the CAA regarding this ACP to inform them of the outcome. CAELUS undertakes to also inform stakeholders of updated operations 2 weeks prior to any planned flying to remind them of the operations and enable schedule deconfliction. Promulgation will also take place via the AIC which will be published in accordance with the cycle and NOTAMs issued at least 24 hours prior to any activation.

4 Complaints

37. It is understood by CAELUS that complaints may be received regarding the activation of the TSA and that these complaints need to be recorded and addressed appropriately. The stakeholders engaged so far have corresponded successfully via the caelus2airspace@traxinternational.co.uk email address and this email address will be

provided in the email informing the stakeholders of the outcome as a method by which complaints can be raised. The AIC will contain this email address and ask that all complaints are forwarded to the same for addressing. All complaints, together with any infringements, will be addressed and recorded accordingly. The CAA AR team will be furnished with copies of any complaints, infringements and the outcomes of the same. The CAELUS consortium is made up of in part NATS and AGS and Skyports and there is a mature relationship between all parties which will allow the raising of any complaints that have been made by other methods, such as through AGS direct, and the recording and addressing of the same. Again, the CAA will be furnished with copies of any complaints that are brought to the attention of any of the CAELUS partners in connection to this ACP.

