

# ACP-2023-015 - Apian Northumbria NHS Air Grid

## Response 1

### Aviation stakeholder engagement - part 2

Q3. Are you responding as an individual or do you represent an organisation?
I am responding as an individual
Q4. Did you respond to our previous engagement for this project (ACP-2023-015) which ended in September?
Yes
Q5. Do you support the proposed Airspace Change Proposal?
OBJECT – I object to the proposed changes
Q6. Feedback
The area shown is NOT the area being planned. Please see differences.
Apian replied individually by email to respondent
No

# Response 2

## Aviation stakeholder engagement - part 2

Q3. Are you responding as an individual or do you represent an organisation?

I am representing an organisation

**Organisation**

Q4. Did you respond to our previous engagement for this project (ACP-2023-015) which ended in September?

Yes

Q5. Do you support the proposed Airspace Change Proposal?

NEUTRAL – I neither support nor object

Q6. Feedback

Comments remain extant as per email to airspace@apian.aero from [e-mail redacted] 11 Sep 2023 @17:53:

"As discussed, please find attached our Transmission routes that may need varying degrees of helicopter access (or NGET LOS drone access albeit these do not have ADS-B Out) during the Zipline trial. They should be coloured so I am hoping they can be activated as corridors in which our helicopters would transit along at say, 1000ft agl (ie above the Zipline transit height) to enable a transition to hovering inspections of powerlines <250ft agl.

My proposal is that NGET would activate these corridors by prior arrangement at specific times agreed with the hub and in the event of delay/change/cancellation whilst airborne, inform Newcastle ATC which could be relayed to the hub. Whilst the corridors are active, the helicopter's ADS-B Out will assist deconfliction if procedures can include that Zipline pilots will remain at 1-2nm separation from the transmitted helicopter position when the corridor is active. This will enable the helicopter to climb above the conflict zone of 250-400ft agl if needed.

I am hoping this will allow flexible use of the airspace if the need arises. We notify surveys of these routes to Newcastle ATC in a similar way (see attached pilot briefing note for Non-Standard Flight Notification in Newcastle's CTR)

Ideally the zipline pilots would have a VHF frequency to enable direct comms albeit the heights we hover at may not guarantee line of sight with a ground antennae unless the VHF signal was from directly from the zip.

As an aside, our helicopters also equipped with SkyEcho2 for ADS-B In (the helicopter ADS-B signal is from an integrated GTX-33ES rather than the SkyEcho2) so there is the possibility of utilising 978/868MHz in order that suitably equipped powerline survey aircraft to see where the zips are, albeit the Fleetdeck option could be used on board our helicopters if there was a suitable device App?"

Apian replied individually by email to respondent

Yes

Apian response back to the respondent

Thank you [name redacted] for your feedback.

We have maintained your requirements from your previous feedback, and will be in contact with you following the completion of this stakeholder engagement. We can then discuss appropriate deconfliction procedures to allow you to continue your operations when required within the TDA.

If you have any further questions, please do not hesitate to contact us.

Kind regards,



## Response 3

### Aviation stakeholder engagement - part 2

Q3. Are you responding as an individual or do you represent an organisation?

I am representing an organisation

**Organisation**

Q4. Did you respond to our previous engagement for this project (ACP-2023-015) which ended in September?

No

Q5. Do you support the proposed Airspace Change Proposal?

OBJECT – I object to the proposed changes

Q6. Feedback

The imposition of this flying restriction will affect my business which employs 50 people in different locations in UK. We use light aircraft to transport men and materials to different farms up and down UK. We have bases locally in Northumberland and Dumfries and Galloway.

Apian replied individually by email to respondent

No

## Response 4

### Aviation stakeholder engagement - part 2

Q3. Are you responding as an individual or do you represent an organisation?

I am responding as an individual

Q4. Did you respond to our previous engagement for this project (ACP-2023-015) which ended in September?

No

Q5. Do you support the proposed Airspace Change Proposal?

NEUTRAL – I neither support nor object

Q6. Feedback

Dear Sirs,

Whilst I admire your venture, to determine if unmanned aerial vehicles, commonly called drones, may be used to deliver medicines between hospitals, doctors surgery's and nursing homes etc, the drones being used cannot be used in Class G, open airspace without the creation of a temporary danger area (TDA) which excludes other aircraft from the same airspace. Without the drone having the ability to 'see and avoid' other aircraft these trials, this is not the first one, are fraught with danger. Moreover, operating drones at low level, below 2,000 ft agl, is a further, a dangerous, complication. So, without a tried and tested means to 'see and avoid' other aircraft, then operating drones beyond visual line of sight (BVLOS) over land, in the vicinity of 'congested' a areas, people and buildings, is, in my view, a non-starter.

Moreover, after 2 previous trials, one on the Northumberland coast and one across the Solent, from Thorney Island to the Isle of Wight, what are the cost benefits, to the NHS, of drone versus other more traditional forms of transport, the 'man in a van', the 'bloke on (motor) bike' and, in the case of the Solent, the hovercraft which takes just 10 minutes to cross the Solent. By comparison, the payload of the drone, reported to be just 3 kg, the equivalent of 3 bags of sugar, is minuscule when compared to land, or even sea transport where this is readily available, particularly over short distances.

So, based in your earlier trials, what is the full cost of transporting a small amount of medicines, no more than 3 kg, by drone, compared to transporting a much bigger payload by land over the same distance. Moreover, can the drones, those being used, emulate the advantages of a small vehicle, possibly an electric vehicle (EV), carrying multiple packages, of medicines, to multiple addresses during one journey?

Yours sincerely,

[name redacted]  
[phone number redacted]

Apian replied individually by email to respondent

Yes

## Apian response back to the respondent

Thank you for your response. We appreciate your feedback.

Our targeted aviation stakeholder engagement is requesting feedback relating to the safety and operational aspects of this proposal.

Our work is looking to make improvements and innovate on the great services and support the NHS currently provides. We are always looking ahead to the ever changing challenges the NHS faces, and help create the future of the healthcare service. This will ultimately provide better clinical care, release valuable staff time and improve the efficiency of care pathways. With the continued resource pressures the NHS faces, we believe that UAS can help to provide improved healthcare for the Northumberland community.

Whilst we are happy to discuss the financial implications of the project, it's important to emphasise that the research and development costs do not reflect the longer-term projection for the service costs. For example, McKinsey & Company forecast that costs per delivery will be between \$1-2 per package within the next 5-10 years. In addition, we will measure how a UAS-enabled centralisation model could positively impact cost savings, efficiencies and resilience for the wider healthcare service.

Kind regards,

## Response 5

### Aviation stakeholder engagement - part 2

Q3. Are you responding as an individual or do you represent an organisation?

I am representing an organisation

**Organisation**

Q4. Did you respond to our previous engagement for this project (ACP-2023-015) which ended in September?

Yes

Q5. Do you support the proposed Airspace Change Proposal?

SUPPORT – I support the proposed changes

Q6. Feedback

Thank you for the opportunity to respond to the proposed changes.

I see [REDACTED] has been moved outside of the TDA and the trial period commences on 14th May ending on 13th November 2024. During that period we host 7 race meetings. Tuesday 21st May, Saturday 1st, Saturday 15th, Sunday 23rd June, Friday 4th, Saturday 12th October, Friday 8th November.

As explained in my first submission my main concern would be access to the racecourse for the North East Air Ambulance should we require the service.

Can you please confirm that discussions with the NEAA have taken place allowing access through the TDA should it be required on the days specified above.

Very occasionally we have visitors arrive on a race day via helicopter, would this still be allowed ? providing application was made with specified flight plan or would we have to deny access by air?

I look forward to hearing from you.

Apian replied individually by email to respondent

Yes

Apian response back to the respondent

Thank you for your feedback and support.

Our current proposal is to reduce weekend flying to 2 weekends during the 6 month trial, we will note your dates, and look to deconflict to ensure minimal impact on visitors arriving via air. In the highly unlikely event that is not possible, then we will contact you to discuss.

We are continuing our discussions with all the emergency services entities, but will ensure they have priority access when required. These procedures will form part of our submission to the CAA.

We have reduced the volume of the TDA and believe that aircraft can operate safely to and from Hexham Racecourse without the need to transit through the airspace. A operational number will be provided of the supporting NOTAM for individuals to contact, should they need access. If our operations allow, we will do our best to accommodate.

We will continue to keep you informed of our progress through the airspace change request, if you have any further questions, please do not hesitate to contact us.

Kind regards,

## Response 6

### Aviation stakeholder engagement - part 2

Q3. Are you responding as an individual or do you represent an organisation?

I am responding as an individual

Q4. Did you respond to our previous engagement for this project (ACP-2023-015) which ended in September?

No

Q5. Do you support the proposed Airspace Change Proposal?

OBJECT – I object to the proposed changes

Q6. Feedback

I am a General Aviation pilot and member of the Flying Farmers Association from whom I received the link to your modified proposal. I object to restricted airspace for drone flying until such time as reliable Electronic Conspicuity has been implemented, which would remove the need for it.

In particular I find it incred ble that you could consider flying only with 'ADS-B in'. It is so perverse that I wonder if it could be a misprint and you actually mean 'ADS-B out'? The minimum should be a mode-S transponder with ES transmitting out. 'ADS-B in' is very little use unless you have software to analyse risk of collisions and take corrective action. You should also additionally consider using <https://www.safesky.app/>

Apian replied individually by email to respondent

No



# Response 7

## Aviation stakeholder engagement - part 2

Q3. Are you responding as an individual or do you represent an organisation?

I am representing an organisation

**Organisation**

Q4. Did you respond to our previous engagement for this project (ACP-2023-015) which ended in September?

Yes

Q5. Do you support the proposed Airspace Change Proposal?

SUPPORT – I support the proposed changes

Q6. Feedback

Thank you for your email of 27th Oct 2023 updating us on part 2 of the stakeholder engagement process.

Although the eastern edge of TDA Area A has been moved inland, to the benefit of GA, we at [REDACTED] remain just inside your revised boundary.

We are pleased, however, that you propose “no fly zones for the UAS flight path” to allow model flyers to continue their activities whilst the TDA is active. We therefore offer our full cooperation in the establishment of such a zone at our location and production of the appropriate Letter of Agreement.

Regards

Apian replied individually by email to respondent

Yes

Apian response back to the respondent

Thank you very much for your email and support.

We look forward to working with you closely as we progress through the airspace change process. We anticipate working on the letters of agreement on completion of this stakeholder engagement.

Kind regards,

## Response 8

### Aviation stakeholder engagement - part 2

Q3. Are you responding as an individual or do you represent an organisation?

I am responding as an individual

**Organisation**

Q4. Did you respond to our previous engagement for this project (ACP-2023-015) which ended in September?

No

Q5. Do you support the proposed Airspace Change Proposal?

OBJECT – I object to the proposed changes

Q6. Feedback

Should be lower height than 400ft gal.

Apian replied individually by email to respondent

No

# Response 9

## Aviation stakeholder engagement - part 2

Q3. Are you responding as an individual or do you represent an organisation?

I am representing an organisation

**Organisation**

Q4. Did you respond to our previous engagement for this project (ACP-2023-015) which ended in September?

Yes

Q5. Do you support the proposed Airspace Change Proposal?

OBJECT – I object to the proposed changes

Q6. Feedback

Hi, Thankyou for the opportunity to feed back on this topic.

As [redacted] is now Northumberland's largest manufacturer and private employer we are a very visible sight in the Tyne Valley. We require UAV's to manage our raw materials on our sites (using VLOS).

Section F of the proposed revised TDA is directly over our Hexham factory, as well as our Acomb Storage Facility. As previously advised in my feedback we operate at both sites using VLOS at heights up to 400ft AGL potentially any time of week (daylight) and year-round.

We will need to continue operations of our UAV's over our sites - this is a key part of our day-to-day business operations. I note your proposal for model and other VLOS flyers but I would question - why does the TDA need to incorporate the airspace above our sites? Section F actually runs almost to our boundary which is frustrating!

On my previous emails I have mapped out the sites for you. I can resend if needed or as an alternative I have roughly plotted the boundary by GR below.

[redacted]

[redacted]

Appreciate you have a lot of stakeholders to keep happy here, which is an unenviable task!

I look forward to hearing back from you.

Best Regards  
[name redacted]

Apian replied individually by email to respondent

Yes

## Apian response back to the respondent

Dear [name redacted],

Thank you very much for your response.

We have maintained your details and the mapping you have provided from the initial stakeholder engagement, which is extremely helpful. We can confirm that for our proposal, the area you provided will be avoided by our UAS operations, so your operations will not be affected and can continue as usual.

We will be reviewing all feedback and making any further adjustments following this stakeholder engagement. We will review the boundary you refer to as part of this and will contact you following that review to discuss any further steps.

Kind regards.

# Response 10

## Aviation stakeholder engagement - part 2

Q3. Are you responding as an individual or do you represent an organisation?

I am responding as an individual

Q4. Did you respond to our previous engagement for this project (ACP-2023-015) which ended in September?

Yes

Q5. Do you support the proposed Airspace Change Proposal?

OBJECT – I object to the proposed changes

Q6. Feedback

On slide 4 you say you will operate for an INITIAL period of six months. This implies potential for extension and perhaps current intent. The basis of the consultation and assessment is on the basis that this is temporary, APIAN should not be using this process to get the thin end of the wedge in before attempting to drive it further. APIAN should make it clear that this will be a six month trial.

I note that the trial is centred on the summer period. I foresee you coming back and arguing that future commercial operations will need to be year round and therefore you would like an extension. APIAN should state its position on this clearly, now.

While the reduced area and heights are welcome, the upper AMSL limits rise in the west for obvious reasons nearer higher ground. However from the Scottish central belt to the south of the Peak District, the Tyne Valley (more specifically following the river Tyne itself) is the only East-West route that can be used in certain low cloud-base conditions for VFR GA traffic. Areas E, F and G block this route. For example, the elevation of Hexham is approx 600' but the top of the TDA would be 1,200'. The removal of 600' of margin will make this route impassable with a cloud base less than approx 2000', which is exactly when it is most needed.

Apian replied individually by email to respondent

No

# Response 11

## Aviation stakeholder engagement - part 2

Q3. Are you responding as an individual or do you represent an organisation?

I am responding as an individual

Q4. Did you respond to our previous engagement for this project (ACP-2023-015) which ended in September?

Yes

Q5. Do you support the proposed Airspace Change Proposal?

OBJECT – I object to the proposed changes

## Q6. Feedback

While the updated proposal goes some way towards mitigating some of the concerns raised, it doesn't remove a reasonable amount of additional risk to local airspace users. There are still many considerable areas of TDA's that will make the local area difficult to safely navigate, particularly if attempting to avoid Newcastle's CAS or low cloud bases commonly seen in the North East.

I'm also concerned about the additional wording within the latest proposal that state a desired "initial period of six months, from 14 May to 14 November 2024.". This gives Apian the opportunity to extend the TDA timeframe even further, something which is unacceptable to local airspace users. As the proposed UAS platform suffers from considerable windspeed limitations, any tests should they be approved, should be limited to a fixed period during the winter months in order to gain the most realistic usability data. Testing the platform during relatively benign summer weather will generate little real world usability data.

The CAA have recently published a new scheme for trials for BVLOS drone operators that does not require the application of a TDA. As APIAN is already part of this trial, the proposed trial for Northumbria NHS should instead take place within Apian's London Health Bridge trial in order to minimise risk and disruption to airspace users in the North East.  
<https://www.caa.co.uk/newsroom/news/new-trials-move-the-uk-closer-to-allowing-everyday-drone-deliveries-and-flying-beyond-visual-line-of-sight/>

Newcastle airport have recently objected to a planning application by Eshott Airfield to extend their operating hours. Eshott is local to this ACP. Newcastle have objected on the grounds that they wish to avoid infringements of controlled airspace and are concerned about increased Air Traffic Control Officer workload. As the Apian proposal will push local GA traffic closer to the bases and boundaries of Newcastle's CAS in order to avoid the TDA, and also force many sensible pilots to opt for an ATC Service from Newcastle in order to avoid potential prosecution by the CAA for an inadvertent airspace bust caused by the TDA, It is only reasonable to expect that Newcastle have reduced ability to service this additional workload caused by Apian's TDA. As Newcastle have an obligation to provide an air traffic service to local airspace users wishing to transit the Class D controlled airspace, its imperative that any workloads (and additional airspace) be kept to a minimum. Newcastle have also NOTAM'd regular CAS and Airfield closures for multiple periods of 30 minutes each day for around 3 years due to staff sickness, so it's clear that Newcastle ATC are already stretched.

<https://publicaccess.northumberland.gov.uk/online-applications/applicationDetails.do?activeTab=summary&keyVal=RV678IQSHWE00>

"23/01921/FUL | Application to allow amended operating hours to 07:00-23:00, training and fuelling of military and emergency services aircraft, provision of temporary structures and retrospective café.

Thank you for consulting the Airport on the above written application. The Aerodrome Safeguarding team have had the opportunity to review the application and have the following comments to make;

The Airport raises concerns over the increase in operating hours proposed within the planning application. An increase in operating hours will encourage increased users to the airfield. Alongside this, the extended operating hours are likely to encourage additional flying schools to be established at the airfield.

Whilst the Airport is supportive of growth within the aviation sector, there are concerns that this increase will provide additional Air Traffic Control Officer workload and an increase in airspace infringements from relatively inexperienced pilots. The Airport seeks to avoid such infringements and potential delays as a result.

The Airport has seen a rise in airspace infringements from the General Aviation community in 2023 from 2022 as the sector recovers from covid (16 in 2023 so far as opposed to 13 throughout 2022).

Whilst not all of general aviation airspace infringements are directly associated with Eshott Airfield, it is a fair assumption to consider that any increase in general aviation in the region will lead to a greater number of airspace infringements. The proposals may also lead to an increase in Instrument Flight Rules training requests which cannot be supported at this time.

As a result of the above, the Airport wishes to formally object to the proposal to extend the operating hours of Eshott Airfield."

## Apian replied individually by email to respondent

No

## Response 12

### Aviation stakeholder engagement - part 2

Q3. Are you responding as an individual or do you represent an organisation?

I am representing an organisation

**Organisation**

Q4. Did you respond to our previous engagement for this project (ACP-2023-015) which ended in September?

Yes

Q5. Do you support the proposed Airspace Change Proposal?

NEUTRAL – I neither support nor object

Q6. Feedback

Thank you for your information.

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

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

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

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

Kind regards

[Name redacted]

Apian replied individually by email to respondent

No



## Response 13

### Aviation stakeholder engagement - part 2

Q3. Are you responding as an individual or do you represent an organisation?

I am responding as an individual

Q4. Did you respond to our previous engagement for this project (ACP-2023-015) which ended in September?

No

Q5. Do you support the proposed Airspace Change Proposal?

NO COMMENT – I have no comment to make on the proposed changes

Q6. Feedback

Hello

[Name redacted] here, I fly model aircraft at our site down at the sea front in Blyth. we are members of the BMFA and are regulated by all the current rules in place, will the NHS drone flying effect us, we are governed to 400ft/los flying.

Thank you.

Apian replied individually by email to respondent

Yes

Apian response back to the respondent

Thank you for reaching out to us and identifying yourself as a stakeholder.

We would really appreciate it if you could give us some more information about your operations so we can work with you to ensure your operations continue as normal. We are currently working with VLOS and model flying sites to ensure they can continue operations and are confident we can work on a suitable mitigation which allows both operations to continue if our proposal is approved by the CAA.

We are currently in contact with Blyth Valley Radio Model Club, who we believe operate in the area you describe.

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,

## Response 14

### Aviation stakeholder engagement - part 2

Q3. Are you responding as an individual or do you represent an organisation?

I am responding as an individual

Q4. Did you respond to our previous engagement for this project (ACP-2023-015) which ended in September?

Yes

Q5. Do you support the proposed Airspace Change Proposal?

OBJECT – I object to the proposed changes

Q6. Feedback

Thank you for the notice of the reduced and therefore improved TDA proposal. My comment would be why it took so much effort from the aviation community to force Apian into actually thinking carefully and considering other airspace users instead of taking a more considered and professional approach to the proposal in the first place? Does Apian lack some of the critical skills/experience required for consideration of TDA applications?

Another concern I have personally is whether these trials are actually proving to be value for tax payers money given that they are funding in part by government grants?

Have any reports on previous trials been published which detail the taxpayer money spent versus the actual benefits realised?

What are the new trials trying to establish which hasn't already been established in previous trials?

## Response 15

### Aviation stakeholder engagement - part 2

Q3. Are you responding as an individual or do you represent an organisation?

I am representing an organisation

**Organisation**

Q4. Did you respond to our previous engagement for this project (ACP-2023-015) which ended in September?

No

Q5. Do you support the proposed Airspace Change Proposal?

SUPPORT – I support the proposed changes

Q6. Feedback

Our gliding club has a relatively large number of touring motor glider (TMG) pilots. Eshott is a popular destination and has an airfield able to accommodate TMG which have larger wing spans than many other GA aircraft. The original design would have prevented safe access to Eshott from the South.

We are pleased that the proposed TDA has been modified to facilitate safe access in VMC both from a coastal route and from over the Pennines.

We support the development of UAS for community benefit and we remain keen to work with proposers of such schemes to find proportionate, safe and fit for purpose solutions. The new design is a step in the right direction and we support it on the experimental basis that has been proposed.

We look forward to contributing to the review in due course.

## Response 16

### Aviation stakeholder engagement - part 2

Q3. Are you responding as an individual or do you represent an organisation?

I am representing an organisation

**Organisation**

Q4. Did you respond to our previous engagement for this project (ACP-2023-015) which ended in September?

Yes

Q5. Do you support the proposed Airspace Change Proposal?

NEUTRAL – I neither support nor object

Q6. Feedback

Having read your revised submission and the revised TDA it has improved the situation as far as my business is concerned. The new areas now do not include my test/training flight areas so that is good. That only leaves any work for a client which falls within the new TDA.

If as discussed I can submit a kml file of a flight area required in advance of proposed operation with an on the day final clearance then that should cover any work for clients.

I still would want to see ADS-B out as part of the UAS setup. If it can be done for the FAA in the US then what is the issue?

With regard to dropping products by parachute, personally I don't see it as the right solution and the CAA has not allowed this to date. Your new Zipline solution would be a better option given the nature of the hospital locations.

Regards

[name redacted]

# Response 17

## Aviation stakeholder engagement - part 2

Q3. Are you responding as an individual or do you represent an organisation?

I am responding as an individual

Q4. Did you respond to our previous engagement for this project (ACP-2023-015) which ended in September?

No

Q5. Do you support the proposed Airspace Change Proposal?

NEUTRAL – I neither support nor object

Q6. Feedback

Hello,

I have just read the new ACP-2023-015 Aviation Stakeholder document.

My first thoughts were that the reduced size and altitude boundaries are a great improvement on the previous dimensions.

I then looked at each of the sectors A through G and noticed that the vertical limits are 800,750,1000,1150,1000,1200,and 1200 feet amsl respectively. Clearly these are related to the height of the highest terrain in each sector. Having so many different heights could create pilot confusion and complicated mapping and I wonder if it could be simplified with slightly altered routing to avoid high ground.

My next comment is that the document says...

“Does the UAS have Electronic Conspicuity? For this initial stage of the trial, the UAS will be equipped with ADS-B in.”

This seems unacceptable to me. Surely to enhance flight safety, especially in a trial situation, the UAS's should also have ADSB-OUT. It is cheap, is effective, and if the CAA has any money left in their budget for EC it could be subsidised! We have all been encouraged to add this capability to our aircraft.

Lastly I wonder if the trial has any “blind” component. By which I mean are there going to be parallel deliveries made by road for each and every delivery made by UAS? With courier motorcycles (operated by a different company to avoid bias) leaving at exactly the same time as the UAS's? What actually will the time saving be?

Best Regards

[Name redacted]

Apian replied individually by email to respondent

No

# Response 18

## Aviation stakeholder engagement - part 2

Q3. Are you responding as an individual or do you represent an organisation?

I am representing an organisation

**Organisation**

Q4. Did you respond to our previous engagement for this project (ACP-2023-015) which ended in September?

Yes

Q5. Do you support the proposed Airspace Change Proposal?

OBJECT – I object to the proposed changes

Q6. Feedback

Hi Rebecca, I just wanted to formally respond to the revised ACP. I have only objected because we don't have a deconfliction and TDA access plan in place as yet.

As with this and previous ACPs within the Great North Air Ambulance Service's operating area our priority is to be able to gain entry to the TDAs at very short notice (less than 5 mins max). This is to ensure our patient response times are not delayed.

The Hexham gap is one of our main transit areas in poor weather so TDA's C to G are of particular concern.

So essentially, for us to support the ACP we would need a robust plan in place that allows our aircraft to transit and land within the TDAs without delaying our HEMS operations.

Apian replied individually by email to respondent

Yes

Apian response back to the respondent

Dear [name redacted],

Thank you for your response and we understand your reasons for not supporting at this stage.

We will shortly be sending you our draft letters of agreement (LOA's) and Temporary Operating Instructions that capture the process for short notice access to our proposed TDA. These will outline how you can safely gain access to the TDA for your emergency operations.

We anticipate getting these to you before the end of November, as we understand this is important information which you require before you are able to support our proposed TDA.

Once you have received this documentation we would welcome a call with you to discuss any feedback or suggested changes/requests before we finalise them.

## Response 19

### Aviation stakeholder engagement - part 2

Q3. Are you responding as an individual or do you represent an organisation?

I am responding as an individual

Q4. Did you respond to our previous engagement for this project (ACP-2023-015) which ended in September?

Yes

Q5. Do you support the proposed Airspace Change Proposal?

OBJECT – I object to the proposed changes

## Response 20

### Aviation stakeholder engagement - part 2

Q3. Are you responding as an individual or do you represent an organisation?

I am representing an organisation

**Organisation**

██████████

Q4. Did you respond to our previous engagement for this project (ACP-2023-015) which ended in September?

Yes

Q5. Do you support the proposed Airspace Change Proposal?

SUPPORT – I support the proposed changes



## Response 21

### Aviation stakeholder engagement - part 2

Q3. Are you responding as an individual or do you represent an organisation?

I am responding as an individual

**Organisation**

Q4. Did you respond to our previous engagement for this project (ACP-2023-015) which ended in September?

No

Q5. Do you support the proposed Airspace Change Proposal?

OBJECT – I object to the proposed changes

Q6. Feedback

Not many if any in north east of England.happy with either venue.  
Drones can drop medicines (closing sq miles of airspace)but vans or motorcycles still have to collect samples etc.hence 2 journeys when one would do.  
Who will pay?The NHS?  
Just work out how many hip replacements they could do with the cost of this silly drone proposal.  
Just because a clever tool is available, you don't have to buy it!

## Response 22

### Aviation stakeholder engagement - part 2

Q3. Are you responding as an individual or do you represent an organisation?

I am representing an organisation

**Organisation**

Q4. Did you respond to our previous engagement for this project (ACP-2023-015) which ended in September?

Yes

Q5. Do you support the proposed Airspace Change Proposal?

OBJECT – I object to the proposed changes

Q6. Feedback

This redesign of the proposed TDA addresses most of the issues raised in our feedback regarding the originally proposed design. The vertical dimension is too high above some of the terrain under the proposed TDA (ie valley floors). There have been numerous trials of the type of trial being proposed, all of which require a TDA. We have seen no justification for this trial that suggests it will achieve anything that other trials have not. On that basis, we do not believe the need and therefore the requirement for a TDA is justified.

## Response 23

### Aviation stakeholder engagement - part 2

Q3. Are you responding as an individual or do you represent an organisation?

I am representing an organisation

**Organisation**

Q4. Did you respond to our previous engagement for this project (ACP-2023-015) which ended in September?

Yes

Q5. Do you support the proposed Airspace Change Proposal?

OBJECT – I object to the proposed changes

Q6. Feedback

Whilst it is recognised and appreciated that the revised TDA is a smaller area than originally planned, [REDACTED] objects due to the following reasons:

1. Unlike a powered aircraft, a field landing in a glider is not an emergency - it is a normal part of gliding activity and the rules of the air still apply. If, during overflight of your TDA, a glider should require to make a field landing due to changing soaring conditions within the TDA that pilot would be infringing airspace illegally. The risk of an airspace infringement within this TDA now closes off our only safe route to go flying to the north whilst remaining clear of NCL's class D and the various military danger areas to the north west.
2. The "valley route" to the west still remains difficult even with your reduced upper limits.
3. Increased controller workload due to reduced available airspace increases risk to aircraft flying within the area and even less chance of pilots successfully receiving a service outside of controlled airspace when requested.
4. Just a polite reminder that in accordance with SERA.5005(f), the CAA permits aircraft to fly below 500ft AGL provided that it is not flown within 500ft of persons, vehicles, vessels or structures. Drone operation below 400' AGL still impacts pilots operating within the law.

Apian replied individually by email to respondent

No

## Response 24

### Aviation stakeholder engagement - part 2

Q3. Are you responding as an individual or do you represent an organisation?

I am responding as an individual

Q4. Did you respond to our previous engagement for this project (ACP-2023-015) which ended in September?

Yes

Q5. Do you support the proposed Airspace Change Proposal?

OBJECT – I object to the proposed changes

Q6. Feedback

Whilst it is recognised and appreciated that the revised TDA is a smaller area than originally planned, [REDACTED] objects due to the following reasons:

1. Unlike a powered aircraft, a field landing in a glider is not an emergency - it is a normal part of gliding activity and the rules of the air still apply. If, during overflight of your TDA, a glider should require to make a field landing due to changing soaring conditions within the TDA that pilot would be infringing airspace illegally. The risk of an airspace infringement within this TDA now closes off our only safe route to go flying to the north whilst remaining clear of NCL's class D and the various military danger areas to the north west.
2. The "valley route" to the west still remains difficult even with your reduced upper limits.
3. Increased controller workload due to reduced available airspace increases risk to aircraft flying within the area and even less chance of pilots successfully receiving a service outside of controlled airspace when requested.
4. Just a polite reminder that in accordance with SERA.5005(f), the CAA permits aircraft to fly below 500ft AGL provided that it is not flown within 500ft of persons, vehicles, vessels or structures. Drone operation below 400' AGL still impacts pilots operating within the law.

## Response 25

### Aviation stakeholder engagement - part 2

Q3. Are you responding as an individual or do you represent an organisation?

I am responding as an individual

Q4. Did you respond to our previous engagement for this project (ACP-2023-015) which ended in September?

No

Q5. Do you support the proposed Airspace Change Proposal?

OBJECT – I object to the proposed changes

## Response 26

### Aviation stakeholder engagement - part 2

Q3. Are you responding as an individual or do you represent an organisation?

I am representing an organisation

**Organisation**

Q4. Did you respond to our previous engagement for this project (ACP-2023-015) which ended in September?

Yes

Q5. Do you support the proposed Airspace Change Proposal?

NEUTRAL – I neither support nor object

Q6. Feedback

The MOD believe the changes to the dimensions and activation times of the TDA will reduce the potential impact on MOD operations. The MOD are content with the procedures and agreements being developed to enable no-notice military access to the TDA in the event of operational commitments, such as national security operations.

Even with a reduction in the TDA, MOD stakeholders have still fed back some concerns and potential impacts, along with some suggested mitigations. [REDACTED] are aware that some of these stakeholders have already liaised with Apian and [REDACTED] support and encourage further dialogue in order to ensure everyone's airspace needs are catered for.

Areas F and G may still impact rotary wing ingress and egress to EGD510 Spadeadam. A suitable mitigation would be to inform Spadeadam as early as possible as to the relevant dates and times that the TDA is likely to be active so that they can inform their customers in advance. The potential increase in DACS provision for LFA13 transits due to the TDA would increase Spadeadam controller workload, but the reduction in dimensions (vertical and lateral) of the TDA would help to reduce the impact to manageable levels. The biggest concern that Spadeadam have highlighted remains the Counter-UAS and GNSS/GPS signal jamming activity that takes place there. If Apian require the suspension of jamming activity for the entirety of the trial period, then it will have an unacceptable detrimental impact on MOD operations. There are currently 4 weeks of C-UAS activity booked in at Spadeadam within the trial period, so clarity on this matter would be appreciated.

The biggest potential impact is regarding [REDACTED] that is scheduled to take place over [REDACTED]

1. Could TDA activation times be deconflicted with Exercise VUL times?

2. Could deactivation (or non-activation) of certain segments of the TDA coincide with Exercise times to enable low level Exercise related flying activity to take place? Or would an ATS/DACS be available from Newcastle to be able to transit an active TDA with no UAS activity taking place within it? Clearly this would require buy in from Newcastle ATC and depend on their own resources.

3. Within the active TDAs, is there scope for vertical deconfliction between UAS and rotary wing traffic that could be agreed to if an ATS/DACS is not available?

Please do not hesitate to contact [REDACTED] or existing local POCs for more information.

Apian replied individually by email to respondent

No

## Response 27

### Aviation stakeholder engagement - part 2

Q3. Are you responding as an individual or do you represent an organisation?

I am responding as an individual

Q4. Did you respond to our previous engagement for this project (ACP-2023-015) which ended in September?

Yes

Q5. Do you support the proposed Airspace Change Proposal?

OBJECT – I object to the proposed changes

Q6. Feedback

As a pilot of a GA aircraft operating in this area, I have continuing concerns:

1. the area to the west remains difficult
2. Newcastle Radar is already under resource pressure, and this proposal will increase the difficulty of obtaining an adequate service.

## Response 28

### Aviation stakeholder engagement - part 2

Q3. Are you responding as an individual or do you represent an organisation?

I am responding as an individual

Q4. Did you respond to our previous engagement for this project (ACP-2023-015) which ended in September?

Yes

Q5. Do you support the proposed Airspace Change Proposal?

OBJECT – I object to the proposed changes

Q6. Feedback

Ridiculous imposition on myself and fellow aviators who currently use this airspace on a regular basis for the sake of an unwarranted vanity project that is the brainchild of someone sadly lacking in the aforementioned brain department.

Apian replied individually by email to respondent

No



## Response 29

### Aviation stakeholder engagement - part 2

Q3. Are you responding as an individual or do you represent an organisation?

I am representing an organisation

**Organisation**

████████████████████

Q4. Did you respond to our previous engagement for this project (ACP-2023-015) which ended in September?

No

Q5. Do you support the proposed Airspace Change Proposal?

OBJECT – I object to the proposed changes

## Response 30

### Aviation stakeholder engagement - part 2

Q3. Are you responding as an individual or do you represent an organisation?

I am representing an organisation

**Organisation**

Q4. Did you respond to our previous engagement for this project (ACP-2023-015) which ended in September?

Yes

Q5. Do you support the proposed Airspace Change Proposal?

SUPPORT – I support the proposed changes

Q6. Feedback

Pleased to see that our previous concerns have been addressed.

Thank you.

Apian replied individually by email to respondent

No

# Response 31

## Aviation stakeholder engagement - part 2

Q3. Are you responding as an individual or do you represent an organisation?

I am responding as an individual

Q4. Did you respond to our previous engagement for this project (ACP-2023-015) which ended in September?

Yes

Q5. Do you support the proposed Airspace Change Proposal?

OBJECT – I object to the proposed changes

Q6. Feedback

The length of the changes are significantly longer than required (why not 3 months?)

The justifications for the trial are limited (better ways to achieve the desired outcome, better planning, existing methods such as taxis etc)

The imposition on existing airspace users is still great.

Concentrate on spending the money to allow the sharing of airspace, not making it difficult for others to share the airspace.

Thanks

Apian replied individually by email to respondent

No

## Response 32

### Aviation stakeholder engagement - part 2

Q3. Are you responding as an individual or do you represent an organisation?

I am representing an organisation

**Organisation**

Q4. Did you respond to our previous engagement for this project (ACP-2023-015) which ended in September?

Yes

Q5. Do you support the proposed Airspace Change Proposal?

SUPPORT – I support the proposed changes

Q6. Feedback

We as a club are happy with the outcome of the previous meetings and don't feel the need to attend any other meetings. Please keep us informed of any future developments.  
Thanks [name redacted].

Apian replied individually by email to respondent

No

## Response 33

### Aviation stakeholder engagement - part 2

Q3. Are you responding as an individual or do you represent an organisation?

I am representing an organisation

**Organisation**

Q4. Did you respond to our previous engagement for this project (ACP-2023-015) which ended in September?

Yes

Q5. Do you support the proposed Airspace Change Proposal?

SUPPORT – I support the proposed changes

Q6. Feedback

While the changes are supported by us it is still unclear as to the (if any) impact on NCL operations.

The statement of need has not been amended following earlier feedback in September and the Design Principles appear to be missing thus full assessment or comment of the correct following of due process can not be determined at this time.

It is also noted that the trial plan still refers to the 'larger' body of airspace that has a higher impact on local aviation operations. An updated map has been shared but not seen on the portal.

Apian replied individually by email to respondent

No

## Response 34

### Aviation stakeholder engagement - part 2

Q3. Are you responding as an individual or do you represent an organisation?

I am responding as an individual

Q4. Did you respond to our previous engagement for this project (ACP-2023-015) which ended in September?

No

Q5. Do you support the proposed Airspace Change Proposal?

OBJECT – I object to the proposed changes

Q6. Feedback

As a Glider pilot and owner of a LS7 flying from Currock Hill (Northumbria Gliding Club) whilst I appreciate the amendments made to the originally proposed TDA provide less restrictions. The very concept of creating a restriction to cross country flights towards the North west around Newcastle's Class D Boundary when the intention is to fly North could create a significant restriction to our flying in that at times Field Landings which are a practiced and controlled landing becomes necessity particularly when soaring conditions weaken. If such a landing were to take place within your proposed TDA, I can only presume an infringement would occur. The same would apply to the Valley corridor to the West and Hexham area.

I feel this is not acceptable to infringe on Pilots in particular Glider pilots and wish to raise my objection to the whole Apian corridor proposal.

Apian replied individually by email to respondent

No

# Response 35

## Aviation stakeholder engagement - part 2

Q3. Are you responding as an individual or do you represent an organisation?

I am responding as an individual

Q4. Did you respond to our previous engagement for this project (ACP-2023-015) which ended in September?

Yes

Q5. Do you support the proposed Airspace Change Proposal?

OBJECT – I object to the proposed changes

Q6. Feedback

I objected to this proposal and continue to do so for the following reasons:

1 The suggested NHS requirement to deliver medicinal equipment and supplies by fixed wing drones is not supported by a Business Plan or any significant cost/benefit analysis. So, the proposal rests on a hypothesis test which is to be interpreted from the creation of temporary danger areas in springtime 2024. Clearly tests in good weather will create a skewed result to the benefit of the proposers. Drone flights in the adverse winter conditions may not reflect in the sponsor's favour. Other logistic companies are already satisfying their delivery requirements on a same day basis. Spontaneous NOTAMS are not feasible to safe conduct and the freedom of GA pilots to fly in class G airspace. How are the sponsors going to provide a sensible comparison?

2 The area of the temporary Danger areas (restricted air space) has been "topped and tailed" in light of stakeholder opposition, but which does not resolve the principal problem that the proposer is causing to GA pilots flying aircraft limited to vmc/vfr conditions. The proposals interfere with the rights of GA pilots to fly according to their licence privileges. These TDA's over complicate the navigational issues for GA and microlight aircraft.

The proposer is not yet able to prove public benefit by the proposal which can thus be considered frivolous and whimsical by the NHS.

Apian replied individually by email to respondent

Yes

Apian response back to the respondent

Thank you for your email.

We are a healthcare company co-founded by Doctors and working with the NHS, delaying emergency services would contradict our core values.

We understand your concerns regarding HEMS access. Our initial communications with the emergency services was for access within 10 minutes of requesting it. This does not mean we are delaying them by 10 minutes, requests for access are provided in advance of them approaching the TDA.

Access for emergency services will always be prioritised over our operations. As in our previous trials, procedures to define the process for access for emergency services and military on short notice taskings are being agreed with them directly. This is to ensure they are comfortable that we meet their operational requirements. This is being finalised with those parties and will be shared with the CAA as part of our formal ACP submission.

We will include this added feedback to your previous response.

Kind regards.

## Response 36

### Aviation stakeholder engagement - part 2

Q3. Are you responding as an individual or do you represent an organisation?

I am representing an organisation

**Organisation**

Q4. Did you respond to our previous engagement for this project (ACP-2023-015) which ended in September?

Yes

Q5. Do you support the proposed Airspace Change Proposal?

SUPPORT – I support the proposed changes

Q6. Feedback

It was great meeting with the team and finding out much more about the project in person, perhaps many more of these events around the region inviting invested parties / local airfield operators etc, it's good to hear that Apian has listened to our requirements and chosen to reduce their airspace requirements for this trial to avoid our fixed flying sites around the region as our sport has been around for many many years and should also be promoted for the many elements its gives people from the mental health perspective.



## Response 37

### Aviation stakeholder engagement - part 2

Q3. Are you responding as an individual or do you represent an organisation?

I am responding as an individual

Q4. Did you respond to our previous engagement for this project (ACP-2023-015) which ended in September?

Yes

Q5. Do you support the proposed Airspace Change Proposal?

NEUTRAL – I neither support nor object

Q6. Feedback

Good presentation by both teams and well-informed, thank you. I was surprised how small the take up attendance was for our 5.30 session but this may have had more to do with timing rather than reluctance on any ones part to join in. Everyone was enthusiastic and knowledgeable and for my part I would like to see the CAA particularly taking more of a lead in both the trials and the question of standards and of course conspicuity and actively making the GA community aware of their thoughts, planning & progress.

Apian replied individually by email to respondent

No

## Response 38

### Aviation stakeholder engagement - part 2

Q3. Are you responding as an individual or do you represent an organisation?

I am responding as an individual

**Organisation**

Q4. Did you respond to our previous engagement for this project (ACP-2023-015) which ended in September?

Yes

Q5. Do you support the proposed Airspace Change Proposal?

OBJECT – I object to the proposed changes

Q6. Feedback

Dear Sir/Madam,

As a regular user of this airspace I feel it is still far from thought out in terms of conflict esp GA VFR

Listed below are some of our concerns

Proximity to Spadeadam and high ground to the South creating a choke point

The Tyne valley is used by RAF who quite often do electronic jamming which spreads into the Valley by quite a distance

No or very little Basic service available esp as Newcastle is constantly advertising no service due to lack of staff,

Also

The Dutch air force and RAF are using Carlisle Airport for manovers a few times annually which spans out to the Valley.

A lot of pilots from Scotland and the South when unable to transit via the lakes due to weather use this corridor.

With fast changing weather in this area I feel there will be lots of conflicting traffic as well as airspace,

Surely it can't be right to restrict such a narrow important piece of airspace even when most of the time it isn't being used,

At very least Apian should only close when being used and supply a service to other users,

Regards

[Name redacted]

Apian replied individually by email to respondent

No

## Response 39

### Aviation stakeholder engagement - part 2

Q3. Are you responding as an individual or do you represent an organisation?

I am representing an organisation

**Organisation**

██████

Q4. Did you respond to our previous engagement for this project (ACP-2023-015) which ended in September?

Yes

Q5. Do you support the proposed Airspace Change Proposal?

NEUTRAL – I neither support nor object

Apian replied individually by email to respondent

No

# Response 40

## Aviation stakeholder engagement - part 2

Q3. Are you responding as an individual or do you represent an organisation?

I am representing an organisation

**Organisation**

Q4. Did you respond to our previous engagement for this project (ACP-2023-015) which ended in September?

Yes

Q5. Do you support the proposed Airspace Change Proposal?

NEUTRAL – I neither support nor object

Q6. Feedback

██████ is pleased that you have taken account of many of our, and other airspace users, concerns raised in Part 1 feedback. However, we still have concerns though remain neutral to the proposed changes until we see your response to Part 2 feedback.

In your response to our feedback you stated: "The UAS will be equipped with ADS-B in to provide the UAS operator with a picture of air traffic." Will it not also have ADS-B Out?

Where is the safety case and the risk mitigation against issues like EC / Transponder failure ? What are the collision avoidance strategies of your UAS in the event that there is an infringement of the TDA? How will you deal with an infringing aircraft and how will you maintain the safety of the airspace, especially as the UK has no common surveillance system and, with carry-on devices, there is also the issue of shielding. There is a need for a risk assessment prior to the start of any activity.

Also: "... use of NOTAMS in a dynamic way is something we have started to discuss with the CAA already." It will be interesting to hear the outcome of these discussions, but even with the current limitations of NOTAM will you be able to activate and de-activate the separate sections in a timely manner to allow access to the airspace? A simple website showing the current days activity, or perhaps mobile app with push notifications, might be useful if the trial goes ahead.

What is the likely downtime of the UAS due to weather or technical issues and what are your estimated number of days that weather or technical issues will prevent flights? This assumes that you have such data about the system reliability to make an estimate. In any event, there will be downtime which would presumably necessitate a backup emergency delivery service to be in place. While not part of the ACP, what is your expectation of a successful business case for such a service, when compared to motorcycle or vehicle, including EV, delivery, that makes this trial worthwhile?

What are the success criteria that the trial will be measured against?

BVLOS operations of UAS are proven, so what is novel about this trial? ████████ feel that too many ACPs are being raised that only repeat what has already been learned from previous trials and look to the CAA to require that Sponsors identify where their proposal will add new knowledge, e.g. conducting practical trials for integration of unmanned aircraft with manned aircraft.

Apian replied individually by email to respondent

Yes

# Response 41

## Aviation stakeholder engagement - part 2

Q3. Are you responding as an individual or do you represent an organisation?

I am responding as an individual

Q4. Did you respond to our previous engagement for this project (ACP-2023-015) which ended in September?

No

Q5. Do you support the proposed Airspace Change Proposal?

OBJECT – I object to the proposed changes

Q6. Feedback

I am a private pilot and I can see that the proposal severely limits the freedom to fly in the North East by the establishment of a Temporary Danger Area (TDA). Trials were recently completed in the Morecambe Bay area without the necessity for a TDA. I approve the use of drones to help with hospital communications. I understand that they operate at low level like all existing unpiloted or remotely controlled aircraft. Such activity would never conflict with manned aircraft, whose pilots will be obeying the 500 ft rule.

Apian replied individually by email to respondent

No

## Response 42

### Aviation stakeholder engagement - part 2

Q3. Are you responding as an individual or do you represent an organisation?

I am representing an organisation

**Organisation**

Q4. Did you respond to our previous engagement for this project (ACP-2023-015) which ended in September?

No

Q5. Do you support the proposed Airspace Change Proposal?

OBJECT – I object to the proposed changes

Q6. Feedback

As an airfield operator in the North West of England, we regularly have microlight pilots heading across country to visit airfields in the North East and vice versa.

My major objection to your proposed airspace change is that you are taking up a vast area of airspace which is restricting access to airfields used and required for safe flying of microlights.

Although many microlights have technology (Transponders or PilotAware) that allows them to be seen by other aircraft this is not mandatory and all microlights fly using VFR rules.

Your aircraft currently have no technology such as a Transponder on them that would allow the majority of pilots to identify them coming towards them.

Your aircraft also fly at a high enough speed that they present a real danger to microlight pilots and are small enough that they would struggle to see them in the first place.

Is it possible to keep drone flights to a low level routes between point A to B keeping to valleys and below 400 feet or lower and also avoiding airspace where microlight airfields exist. These simple steps would help to keep microlights and drones out of each others way, also fitting Transponders on drones would also allow microlights to fly with an added degree of safety. At the end of the day, safety is paramount and the microlight community has done all it can to be as safe as possible.

If you would like a meeting with myself and potentially with a group of microlight pilots I would be happy to make myself and others available.

Many Thanks

[Name redacted]

Apian replied individually by email to respondent

Yes

## Response 43

### Aviation stakeholder engagement - part 2

Q3. Are you responding as an individual or do you represent an organisation?

I am responding as an individual

Q4. Did you respond to our previous engagement for this project (ACP-2023-015) which ended in September?

No

Q5. Do you support the proposed Airspace Change Proposal?

OBJECT – I object to the proposed changes

Q6. Feedback

As a pilot it is my view that this proposal puts air users in serious danger. There is no way to detect these small flying drones. i understand that they do not opertate electronic conspicuity devices which therefore renders them a serious danger to pilots. It may be possible to operate these in a small tight low level corridor but the size of the area requested is significantly too large.

Apian replied individually by email to respondent

No

# Response 44

## Aviation stakeholder engagement - part 2

Q3. Are you responding as an individual or do you represent an organisation?

I am responding as an individual

**Organisation**

Q4. Did you respond to our previous engagement for this project (ACP-2023-015) which ended in September?

Yes

Q5. Do you support the proposed Airspace Change Proposal?

NEUTRAL – I neither support nor object

Q6. Feedback

As an airfield operator in the North West of England, we regularly have microlight pilots heading across country to visit airfields in the North East and vice versa.

My major objection to your proposed airspace change is that you are taking up a vast area of airspace which is restricting access to airfields used and required for safe flying of microlights.

Although many microlights have technology (Transponders or PilotAware) that allows them to be seen by other aircraft this is not mandatory and all microlights fly using VFR rules.

Your aircraft currently have no technology such as a Transponder on them that would allow the majority of pilots to identify them coming towards them.

Your aircraft also fly at a high enough speed that they present a real danger to microlight pilots and are small enough that they would struggle to see them in the first place.

Is it possible to keep drone flights to low level routes between point A to B keeping to valleys and below 400 feet or lower and also avoiding airspace where microlight airfields exist. These simple steps would help to keep microlights and drones out of each others way, also fitting Transponders on drones would also allow microlights to fly with an added degree of safety. At the end of the day, safety is paramount and the microlight community has done all it can to be as safe as possible.

If you would like a meeting with myself and potentially with a group of microlight pilots I would be happy to make myself and others available.

[Name redacted]

Apian replied individually by email to respondent

Yes

Apian response back to the respondent

Hi [name redacted],

Thank you for the information.

Just to clarify our trial is not taking place in Morecambe Bay but in Northumbria.

Since we are aware microlights do route over to the North East from your location, we will continue to ensure that you are kept informed about any changes or additional information relating to this trial.

Link to the CAA portal - ACP-2023-015 Northumbria stage 2

Kind regards,



## Response 45

### Aviation stakeholder engagement - part 2

Q3. Are you responding as an individual or do you represent an organisation?

I am responding as an individual

Q4. Did you respond to our previous engagement for this project (ACP-2023-015) which ended in September?

Yes

Q5. Do you support the proposed Airspace Change Proposal?

NEUTRAL – I neither support nor object

Q6. Feedback

Dear Apian.

Thank you for giving me the chance to respond to the second version of your drone Trial plan. The improvements for all involved are very welcome and you almost have a workable plan. However there are three issues that need resolving. Firstly the six month trial goes against CAA policy as outlined in CAP 1616 page nine, point 1.2 . You are seeking a temporary change to airspace for a Drone trial and this would not normally last longer than 90 days. You are not seeking a change of airspace trial. For what my opinion is worth your trial should start on November 1st 2023 and run for 90 days to be able to gather useful data during all weather conditions. Secondly in order to minimise the risk of airspace infringement none of the TDA tops should be higher than 1000' AMSL. There is plenty of room for this while still allowing safe terrain clearance for the drone. Lastly and very importantly although I have asked repeatedly there is still not an answer to the question of what happens when the emergency services need access to any part of the TDAs. How is access requested and what happens to the drone on route. Delay to HEMS is not for discussion because it must not happen.

Apian replied individually by email to respondent

Yes

## Response 46

### Aviation stakeholder engagement - part 2

Q3. Are you responding as an individual or do you represent an organisation?

I am responding as an individual

Q4. Did you respond to our previous engagement for this project (ACP-2023-015) which ended in September?

No

Q5. Do you support the proposed Airspace Change Proposal?

OBJECT – I object to the proposed changes

Q6. Feedback

I strongly object to this air space removal and the use of drones for this type of delivery, the reasons are as follows;

1. The proposed air space removal is too large, too high and is dangerous.

The proposed area in question is in the direct vicinity of a very busy airport (Newcastle) and surrounds it completely from the North, East and west.

It is also in the vicinity of Spadeadam AIAA danger zone which is an area of intense activity low flying military aircraft. It is also used by military anti-aircraft jamming and counter-devices which could have a catastrophic effect on the drone controls / GPS, etc.

The proposed area does not take in to account aircraft routing to or around Newcastle CTA or the VRP's, Helicopter landing areas, etc. it also makes it very difficult for aircraft heading North or south and could lead to an increase in air space infringements.

2. The whole concept is wrong and misleading, the company states "To validate the expected benefits of using UAS to deliver critical medical payloads to enhance supply chain responsiveness" and "to improve health outcomes, the environment and staff wellbeing by bringing on-demand, sustainable logistics to the NHS and healthcare industry.

There are no expected benefits to the British tax payer, the NHS staff or patients. These drones will cost more to run, additional NHS staff will need to be found, trained and resources put in place to accommodate delivery. The supply chain will not be enhanced or made sustainable. A drone has a very limited payload of about 1kg, it uses Lithium Batteries which need constant charging and are made by very damaging environmental methods. (mining)

The simple introduction of an electric delivery vehicle (readily available) can deliver 1000kg and more in one go as appose to 1000 drone deliveries. – that is not sustainable or enhancing logistics

Apian replied individually by email to respondent

No

# Response 47

## Aviation stakeholder engagement - part 2

Q3. Are you responding as an individual or do you represent an organisation?

I am representing an organisation

**Organisation**

Q4. Did you respond to our previous engagement for this project (ACP-2023-015) which ended in September?

Yes

Q5. Do you support the proposed Airspace Change Proposal?

NEUTRAL – I neither support nor object

Q6. Feedback

We appreciate the efforts Apian have made to adapt ACP-2023-015, and generally find these adaptations positive. But would still like to highlight certain potential issues around Electronic Conspicuity, Duration and NOTAMs.

EC: It has been reported that the UAS only receives ASD-B but does not transmit. Whilst this is better than nothing it only provides half of the situational picture and would still require visual identification were the drone to stray accidentally outside of the TDAs or other aircraft straying accidentally into TDAs.

Duration: CAP1616 UAS TDA trials should only extend beyond 90 days in extraordinary circumstances.

NOTAM: Weekly application of NOTAMs is an improvement in event of cancellation and access to airspace but may still leave it unnecessarily inaccessible, say if a trial were cancelled early in the week. Whilst it is impractical to submit daily NOTAMS (and the CAA would probably deem this NOTAM proliferation). Anything that can be done to increase the precision/fit of the duration of the NOTAM to conform around the exact duration of the trial would be appreciated.

Apian replied individually by email to respondent

Yes

Apian response back to the respondent

Dear [name redacted],

Thank you for providing us with feedback, we appreciate you taking the time out to respond. We are pleased to hear that you welcome our adjustments we have made. We would like to clarify your points below.

We are working in collaboration with the CAA to support the development of integrated airspace that allows equitable use for all airspace users. This work involves a range of areas from electric conspicuity, detect and avoid, operational and technical requirements, to procedures and equipment for BVLOS flights in controlled and uncontrolled airspace. Apian will ensure trial objectives align with the Airspace Modernisation Strategy, and trial learnings support the development of CAA policies and Government regulation to enable integration.

We are applying for an airspace trial, CAP1616 Part 1b Airspace Trials page 92, paragraph 315 which states a trial can be for up to 6 months.

Thank you for your comments regarding the NOTAM procedure, this is incredibly helpful. We will continue to work with the CAA on these procedures and have provided them with feedback. We will ensure that the TDA is activated/deactivated using the defined NOTAM process, as soon as possible.

Many thanks,  
Aviation team, Apian.



## Response 48

### Aviation stakeholder engagement - part 2

Q3. Are you responding as an individual or do you represent an organisation?

I am responding as an individual

Q4. Did you respond to our previous engagement for this project (ACP-2023-015) which ended in September?

Yes

Q5. Do you support the proposed Airspace Change Proposal?

NEUTRAL – I neither support nor object

Q6. Feedback

The proposed changes to the original proposal are a good step in the right direction. However, I do not understand why the Apian drones require corridors five miles wide. I have considerable experience with drones and know that they very accurately track their preprogrammed routes. Obviously if the trial involves drones going to multiple destinations within a small area, then it makes more sense to block out the area rather than to have a spiders web of routes. But it seems likely that in various sectors the drones will simply be transiting along the centreline of a five mile wide corridor. It need only be half a mile wide.

Secondly - there still need to be a crossing service that is accessible by RT at all times, so GA pilot's in flight can check which sectors are in use, and which ones are not in use. Ideally the trial should be organised so that either the area to the East of Newcastle is operational or the area to the West is operational on any specific day, and this confirmed by Notam, so that aircraft can plan accordingly.

Apian replied individually by email to respondent

No

## Response 49

### Aviation stakeholder engagement - part 2

Q3. Are you responding as an individual or do you represent an organisation?

I am responding as an individual

Q4. Did you respond to our previous engagement for this project (ACP-2023-015) which ended in September?

Yes

Q5. Do you support the proposed Airspace Change Proposal?

OBJECT – I object to the proposed changes

Q6. Feedback

- Whilst I appreciate that you have answered most of my initial concerns, I still feel there are some issues that should be addressed.
1. A reduction of the trial to 90 days.
  2. No time delay in allowing emergency services (e.g. Air Ambulance) to access the trial area.

Apian replied individually by email to respondent

No

## Response 50

### Aviation stakeholder engagement - part 2

Q3. Are you responding as an individual or do you represent an organisation?

I am responding as an individual

Q4. Did you respond to our previous engagement for this project (ACP-2023-015) which ended in September?

Yes

Q5. Do you support the proposed Airspace Change Proposal?

SUPPORT – I support the proposed changes

Q6. Feedback

Thank you for the new amended airspace change allowing Stanton and Hexham airstrips to continue to operate outside of the TDA. I appreciate the lowering of the altitude tops of the different sections to more accurately reflect drone operating height. A lot of recreational aircraft sometimes have to fly low to maintain VFR but not normally as low as drone operating height so for me personally you have solved all the issues. Good luck with your venture.

Apian replied individually by email to respondent

No

## Response 51

### Aviation stakeholder engagement - part 2

Q3. Are you responding as an individual or do you represent an organisation?

I am representing an organisation

**Organisation**

Q4. Did you respond to our previous engagement for this project (ACP-2023-015) which ended in September?

No

Q5. Do you support the proposed Airspace Change Proposal?

OBJECT – I object to the proposed changes

Q6. Feedback

My concerns are twofold. Firstly the raison d'être of the trial looks suspicious. Many previous ACPs have shown small machines can take off, fly and land BVLOS carrying a variety of cargo. This particular concept of operations doesn't appear to move the state of the art forward.

Secondly, despite valiant attempts by local representatives from my GA community you persist in developing your plans on wishful thinking. Have you really considered all hazards and identified likelihoods and consequences?

I now understand you are using an imported (not UK developed) flying machine not equipped with a Transponder capable of being interrogated on 1090Mhz. It may be that Newcastle Airport are aware of that deficiency but this hampers the collision avoidance protocols bound up in TCAS. Without an approved emitter, uninvolved inbound a/c to Woolsington will not receive RA/TAs and, should your aircraft deviate from its predetermined trajectory, an Airprox or worse may occur.

I would suggest your ACP is based on a Statement of Need that only you need. The NHS, General Aviation and uninvolved persons on the ground should not be coerced into supporting a trial that appears to achieve employment for drone enthusiasts alone.

Apian replied individually by email to respondent

No



## Response 52

### Aviation stakeholder engagement - part 2

Q3. Are you responding as an individual or do you represent an organisation?

I am responding as an individual

Q4. Did you respond to our previous engagement for this project (ACP-2023-015) which ended in September?

No

Q5. Do you support the proposed Airspace Change Proposal?

OBJECT – I object to the proposed changes

Q6. Feedback

This is totally ridiculous and completely fails to adhere to the CAA requirement to minimise impact on other air users!

Apian replied individually by email to respondent

No

# Response 53

## Aviation stakeholder engagement - part 2

Q3. Are you responding as an individual or do you represent an organisation?

I am responding as an individual

**Organisation**  
myself

Q4. Did you respond to our previous engagement for this project (ACP-2023-015) which ended in September?

Yes

Q5. Do you support the proposed Airspace Change Proposal?

OBJECT – I object to the proposed changes

Q6. Feedback

Q5 is ambiguous and designed to get people to apparently support the proposal, when in fact all they are supporting is the changes compared to the previous proposal, but object to the overall proposal.

I agree that the proposed changes are welcome and a significant improvement over the original ACP, but they don't go far enough.

I object to the ACP as follows

1. There should be no BVLOS trials until a reliable autonomous detect and avoid system is certified and fitted to all BVLOS drones, this should allow the drone to detect and avoid any object it encounters during flight with no requirement for any equipment to be carried by other airspace users (GA, model aircraft, kites, toy drones, cranes etc) The Taxpayers money funding this trial should instead be re-directed to autonomous detect and avoid certification. There is I understand some kind of detect and avoid system on the drone that is proposed for this trial, so first go and test this against a multitude of targets in a safe dedicated drone testing area such as Salisbury Plane or Llanbedr.

This trial shouldn't go ahead until the above requirement is met.

This objection was in my and others' original objection submissions, but you have failed to include it in your feedback of what was said. Please ensure this is included in your submission to the CAA, rather than just picking the items you wish to address.

2. The ceilings of the TDA are still too high, this is because you are using height AMSL above the highest point in each sector, rather than a ceiling based on AGL. The solution is to use AGL, although you quote an ICAO document that says AMSL should be used, the precedent of using AGL is already set as many low level danger areas in France are quoted as AGL, so if its possible in France, its possible in the UK! There may be a need to file a difference to ICAO, but there are plenty of those so not a problem, particularly as in this case it enhances safety.

If you (or the CAA) still refuse to use AGL, then the solution is to make the TDA corridors narrower, so to exclude the highest points, most of the locations you are going to are in valleys with elevation between 400 and 500ft AMSL, so no need to have the TDA above 1000ft AMSL in any area.

The main problem for GA is not being hit by a drone, its inadvertently infringing the TDA when trying to avoid weather, especially if the TDA ceilings are all different, better if they are all 1000ft AGL or below.

3. The proposed length of the trial is too long. CAA rules state the maximum time for a TDA is 90 days, this should not be broken and a full analysis of the trial results and lessons learnt from this and all the other trials should be required before any further trial ACP can be started.

4. There should be a Danger area crossing service with dedicated radio frequency so that crossing can be approved if necessary because of bad weather, technical problem or for emergency services. When the TDA is inactive this could be broadcast by recorded message over the DACS frequency, telling anyone who needs to know that the TDA is inactive and any aircraft can cross. This type of service is used for a lot of danger areas and military class D airspace in France and works well.

5. The proposal includes a statement that there will be two weekends of extended hours to trial NHS out of hours operation. This should not be permitted, if out of hours operations want to be trialled this can be done overnight when it is less imposing on other airspace users.

6. If there is no DACS then the Notams need to be only for single day periods and issued the day before, so that the only active Notams are for the current day and next day to make sure only days where there really is going to be drone operation has the TDA active and its only active for the exact hours of operation with a small buffer. It is imperative that if any drone operation is cancelled, then the TDA is deactivated immediately and all local airspace users informed, at a minimum directly communicating with Newcastle ATC.

Apian replied individually by email to respondent

No

## Response 54

### Aviation stakeholder engagement - part 2

Q3. Are you responding as an individual or do you represent an organisation?

I am responding as an individual

Q4. Did you respond to our previous engagement for this project (ACP-2023-015) which ended in September?

No

Q5. Do you support the proposed Airspace Change Proposal?

OBJECT – I object to the proposed changes

Q6. Feedback

It is not acceptable that a sizeable fixed wing drone with an 11 ft wingspan will be operating in the Newcastle CTR (the TDA within the CTR/CTA will be about 3 miles from the Rwy 25 threshold) without a transponder or EC, rendering it invisible to Commercial Air Transport, GA fitted with ADS-B receivers and leaving Newcastle ATC reliant on primary radar and unspecified procedures. The 6 month duration of the TDA is too long should be limited to 90 days- and whilst the design has been improved, its still denying a large chunk of airspace to other air users. .

Apian replied individually by email to respondent

No

## Response 55

### Aviation stakeholder engagement - part 2

Q3. Are you responding as an individual or do you represent an organisation?

I am responding as an individual

Q4. Did you respond to our previous engagement for this project (ACP-2023-015) which ended in September?

Yes

Q5. Do you support the proposed Airspace Change Proposal?

OBJECT – I object to the proposed changes

Q6. Feedback

I think it is dangerous to press ahead with unmonitored BVLoS UAS flying.

I do not believe that there is sufficient benefit to the general public to change the access to this airspace. It would be far better to wait for adequate see-and-avoid technology and then share the airspace.

I am unconvinced that the affect on livestock and wild animals has been adquatly considered. Startle and disturbance particularly during breeding seasons need addressing.

Apian replied individually by email to respondent

Yes

Apian response back to the respondent

Dear [name redacted],

Thank you for providing us with feedback, we appreciate you taking time out to respond.

We are working in collaboration with the CAA to support the development of integrated airspace that allows equitable use for all airspace users. This work involves a range of areas from electric conspicuity, detect and avoid, operational and technical requirements, to procedures and equipment for BVLOS flights in controlled and uncontrolled airspace. Apian will ensure trial objectives align with the Airspace Modernisation Strategy, and trial learnings support the development of CAA policies and Government regulation to enable integration.

We are currently in the process of engaging with aviation stakeholders. We will be considering any potential impacts on livestock as part of our public engagement phase, which will occur at a later stage in the process.

Kind regards,  
Aviation team, Apian

## Response 56

### Aviation stakeholder engagement - part 2

Q3. Are you responding as an individual or do you represent an organisation?

I am responding as an individual

Q4. Did you respond to our previous engagement for this project (ACP-2023-015) which ended in September?

No

Q5. Do you support the proposed Airspace Change Proposal?

OBJECT – I object to the proposed changes

Q6. Feedback

What is this trial attempting to test? It seems that there have been many many trials doing the same or similar. The fact that this drone will be operating without emitting any form of electronic conspicuity is bizarre.

If drones are to be a part of aviation's future segregation is not the way to proceed. It's integration that needs to be trialled and tested.

Apian replied individually by email to respondent

No

## Response 57

### Aviation stakeholder engagement - part 2

Q3. Are you responding as an individual or do you represent an organisation?

I am responding as an individual

**Organisation**

Q4. Did you respond to our previous engagement for this project (ACP-2023-015) which ended in September?

Yes

Q5. Do you support the proposed Airspace Change Proposal?

OBJECT – I object to the proposed changes

Q6. Feedback

This new proposal has significant issues for safety of pilots flying light aircraft around Newcastle and along the Tyne Valley.

1. There are a number of Visual Reporting Points (VRP) lying within these proposed TDA's. With these TDA areas in force, it will not be possible for pilots to fly close enough to the VRP in order to positively confirm their position.
2. Areas B,C,D,E,F and G are all extending too high an altitude for pilots to safely fly under a low cloudbase. The cloudbase is often at around 1000ft AMSL. I cannot understand why a drone should need so much altitude in which to operate.
3. The width of these proposed TDA's is much greater than the width of airspace taken by the same company for their previous trial north of Blyth (EG D598A/B/C. I can see no reason why.
4. Area A is within controlled airspace. The other areas (B,C,D,E) should be moved to lie within controlled airspace where possible, following the River Tyne. 5. It should be possible to plan a route from the southern border of area A to the River Tyne, and follow the River Tyne to Haydon Bridge.

Apian replied individually by email to respondent

No

## Response 58

### Aviation stakeholder engagement - part 2

Q3. Are you responding as an individual or do you represent an organisation?

I am responding as an individual

Q4. Did you respond to our previous engagement for this project (ACP-2023-015) which ended in September?

Yes

Q5. Do you support the proposed Airspace Change Proposal?

OBJECT – I object to the proposed changes

Q6. Feedback

Firstly, I was disappointed in Q5 which is clearly loaded, I suspect with the intention that responses will be manipulated to demonstrate support for the trial's wider aims rather than the TDA improvements.

However, I am appreciative of Apian's efforts in the face of unprecedented feedback to reduce the impact on other airspace users.

Following the updated TDA/TSA proposal, I have several objections and questions outstanding.

1. Trials general - there doesn't seem to be any national NHS co-ordination of the multiple trials which leads to duplication and waste of limited taxpayers financial grant resource supplied by SBRI and others. These trials (more technical demonstrations I would argue), offer little towards the goal of integration and development of viable DAA, both cooperative and uncooperative. They continue to be hugely disruptive to other air users and the until DAA technology and EC standards are mature and viable then these 'trials' should be strictly limited.

2. Duration – historically UAS TDAs have been limited to 90 days except in extraordinary circumstances. This is explicitly stated in many CAA pubs such as CAP1861. I note you are using the CAP 1616 'Airspace Trials' to justify 6 months but I don't believe the CAA intent was for delivery style demonstrations to go beyond 90 days. The Northumbria trial isn't named as one of 6 projects in the CAA 6 month TRA 'sandbox'. Denying what is still a huge portion of important airspace to other airspace users for 6 months is unacceptable.

3. Altitude – the use of AMSL remains problematic and I know other nations use AGL for UAS (I assume as a ICAO national difference) which I am sure the UAS industry would prefer. Whilst I understand the methodology, 1200ft is still in excess of 500ft AGL over the Tyne valley floor and will potentially block us on the many days where valley fog lifts into low stratus. Regarding altitude, will Apian base the TDA alt on the Newcastle EGNT QNH? This is important when we are operating low-level under a low base and vertical separation margins maybe tight.

4. NOTAMs / DAAIS - I and others fed-back that we never saw NOTAM cancellations in your Northumbria Phase 1 trial. I believe that this is due to a single NOTAM covering a week of activity. Hence, any single day cancellation can't be processed by systems as it would cancel the entire week. I suspect the only way around this is to issue Notams by day and not by week. Will Scottish / London Info and Newcastle ATC provide a DAAIS with hot/cold status of the TDA? Be aware that low-level at the western end of the TDA around Haltwhistle, we are beyond radio LOS of Newcastle Radar 124.380 but can generally get Scottish Info.

5. EC / Transponder - thank you for answering my question on transponder/EC. Whilst I note that the CAA have yet to define standards, I do find it remarkable that the large Zipline UAS will be electronically invisible to Commercial Air Traffic (especially in the in the Newcastle CTA/CTR), GA with ADS-B receivers and importantly Newcastle ATC SSR. As former ATCOs, you'll be aware that the UAS will have a low-RCS and terrain masking will make Newcastle primary detection very challenging. Will you provide Newcastle ATC with any other form of SA in the tower/radar room or will it be done by voice / procedurally?

6. Emergency TDA entry for Emergency Services etc – I note you have stated that can happen within 10 mins and would like some assurance of the robustness of this arrangement - what if the drone operator is already on the phone etc. Again some form of EC could have mitigated this issue if the UAS had been electronically visible.

7. UAS Weather Minima - in one feedback response you mention the Zipline drone operator can fly IFR. What are your weather minima? I would hope that UAS operations are limited to VFR.

Thank you.



# Response 59

## Aviation stakeholder engagement - part 2

Q3. Are you responding as an individual or do you represent an organisation?

I am responding as an individual

Q4. Did you respond to our previous engagement for this project (ACP-2023-015) which ended in September?

No

Q5. Do you support the proposed Airspace Change Proposal?

OBJECT – I object to the proposed changes

Q6. Feedback

Nothing in this amended ACP has addressed the nub of the problem yet. There is no need for this trial to take place at all. It is not demonstrating any new capability or proving any form of operation that has not already been proven in the previous trials around the U.K. All this trial appears to achieve is to take more tax payers money without proving anything innovative.

There is absolutely no need to demonstrate that a drone can fly BVLoS between 2 or more fixed points. This has been done many times.

There is no need to demonstrate that a drone can be used to deliver medical supplies or samples, this has been done many times.

This is NOT a trial or a demonstration of anything new. It is purely and simply a grab for some grant funding while the cash is easily available by sticking a green cross on a drone and claiming it is essential for "Our NHS".

The DfT should immediately stop this circus. There should be a very simple roadmap of trials and tech demonstrators that are necessary to move incrementally from:

proving BVLoS is possible, necessarily within a protected area or protected airspace (done)

To>

proving BVLoS can carry a useful payload and operate from current infrastructure, again necessarily carried out in existing airspace using the protection of a TRA or similar (done)

To>

proving a technological solution is available to allow the BVLoS drone to alert its operator to the presence of traffic allowing the operator to take necessary avoiding action or carry out precautionary landing until the threat has passed. All necessarily carried out in a protected location with a known traffic environment so that meaningful testing can take place (a drone sandbox if you like, LLanbedr would be perfect). Not yet done but possible now.

Until this trial has been carried out successfully all other drone trials should be denied as they are not advancing the technology or the procedures.

To >

A live trial in NOTAMed airspace but possibly in a temporary RMZ and TMZ to allow for safe conduct of the trial, but no further restrictions on other airspace users. Once this trial has been safely conducted then the final stage of trials could be carried out

> full live trials, again probably NOTAMed, but without any other restrictions on other air users, no TMZ, no RMZ, no TRA, just a full monitored trial to see if there is an increase in AIRPROX between crewed aircraft and drones.

> to final state of ground controlled BVLoS operations, live integration into Class G and controlled airspace without any other restrictions.

The process could then be repeated if the technology progresses to autonomous operating drones. Step through the safe stages to prove INTEGRATION with other air users.

Apian replied individually by email to respondent

No

## Response 60

### Aviation stakeholder engagement - part 2

Q3. Are you responding as an individual or do you represent an organisation?

I am responding as an individual

Q4. Did you respond to our previous engagement for this project (ACP-2023-015) which ended in September?

No

Q5. Do you support the proposed Airspace Change Proposal?

OBJECT – I object to the proposed changes

Q6. Feedback

We want to support better health care services but are concerned about danger to human life and loss of historical flying areas along our beautiful coast.

The main points are:-

a) Morecambe bay has been connected to aviation since WW2 when it was used for training purposes. It is one of the few areas in the UK where beach landings are permitted and included on the aviation map. This area should be protected for aviation use and its history.

b) The drone route publicised is in exact conflict with the normal route for many aviation enthusiasts in the area which include parachutes, paramotors and microlight aircraft. Very few aircraft in this category carry transponders so they will not show on any flight radars or tracking devices. A recent report implied there was little activity on the route which is completely untrue. In fact on nice days it is a very busy area and to land on the beach they will fly below 300ft. They will not see a drone so this could cause loss of human life if there is a collision.

c) the route showed the drone flying higher around Heysham power station which is also exactly what the local aircraft do.

If the drone is unmanned why can it not fly primarily over the water which would allow the aircrafts to continue to fly along the coast. If flying over water private aircraft would be at least 1000 feet for safety reasons.

Please do not make our currently actively used airspace restricted - this would affect the many flying schools in the area and the enjoyment for many enthusiasts.

There must be a compromise where the drones can fly where the aircraft do not. I assume they don't want to fly over water in case of malfunction but surely protecting human life is the priority in this instance.

Apian replied individually by email to respondent

Yes

## Apian response back to the respondent

Dear [name redacted],

Thank you for your feedback and for taking time out to respond.

We would like to clarify that this trial is not taking place in Morecambe Bay and will be taking place in Northumbria. You can view our ACP for this trial here on the CAA ACP portal.

We are unaware of the report that you mentioned that implies little GA activity in the area. Could you please confirm if this is for Northumbria or relating to an ACP for Morecambe Bay, which is being completed by another company?

In our previous stakeholder engagement, we obtained vital information about the frequently used flight paths by GA and this engagement has given us a better understanding of the flying in Northumbria and is reflected in our revised TDA.

Kind regards,

Aviation team, Apian.

# Response 61

## Aviation stakeholder engagement - part 2

Q3. Are you responding as an individual or do you represent an organisation?

I am representing an organisation

**Organisation**

Q4. Did you respond to our previous engagement for this project (ACP-2023-015) which ended in September?

Yes

Q5. Do you support the proposed Airspace Change Proposal?

OBJECT – I object to the proposed changes

Q6. Feedback

General

██████████ on behalf of the constituent bodies, maintain their strong objection to this ACP the reasons for which are unchanged since the initial comments made in September 2023.

The ██████ pose the additional questions and comments, to be read in conjunction with our original comments, in light of the now modified scheme:-

1. This ACP is as stated in correspondence, apparently trying to prove a business case that could better be simulated, we suggest. The aspect of operating in UK airspace is not proven by this trial due to the segregation required.
2. The provision of ADSB-In on the vehicle and no ADSB-out is a serious omission even if not required.
3. Whilst the reduction in area of the trial and in operating hours is marginally beneficial the impact on GA remains potentially significant.
4. The reduction in altitude whilst welcome remains as a potential problem in inclement weather.
5. Noted that the local consultation meetings were held but the location is such that a far wider national / international community of GA are possibly impacted.
6. The duration requested by Apian at 6 months remains excessively long for the stated objective in comparison with the potential impact.
7. Whilst you have, in correspondence, directed us to previous work it is noted that there are no useable / useful data in that report.
8. The apparent indecision regarding provision of a danger area crossing service (DACS), in spite of our previous comment on that issue, is unacceptable as there is a clear need for such a pivotal location.
9. Further clarification is needed regarding the provision of the DACS and granting, or not, of crossings during the operation of the Zipline vehicle ?
10. We understand too, from local experience, that there is clarification needed in the issuing and cancellation of NOTAMS. Notams should therefore only be issued on a day by day basis, with 24 hours notice, activated in case of need only, and cancelled at the earliest opportunity if not needed, in order to maximise the use of the airspace by others. Activation on a speculative basis or for longer periods is not reasonable.
11. The ██████ support the need for integration in airspace and between users of the airspace. However this ACP does nothing to further that as an objective.