



# Engagement: Collate & Review

## Portland Heliport (ACP-2022-050)

Date: 19 January 2024

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# 1 Portland Heliport ATZ/FRZ Airspace Change Proposal

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## 1.1 Introduction

This document forms part of the required document set in accordance with guidance contained in CAP 1616 Airspace Change Process (version 5) and the Safety and Airspace Regulation Group (SARG) Policy Statement 115 Establishment of Aerodrome Traffic Zones (ATZ).

In accordance with the additional CAA guidance, formal consultation was not necessary. However, engagement with key stakeholders was undertaken and this document provides evidence that describes that activity before it collates, categorises, and reviews the responses received in line with the regulatory requirements.

## 1.2 Current Status of this Airspace Change Proposal

HeliOperations Limited initiated this ACP (ACP-2022-050) in July 2022 following the process set down in the CAA publication, CAP 1616. The ACP is currently at Stage 3 (CONSULT) of the ACP process.

At the initial stages and commencement of Stage 1 (ASSESS) of the CAA CAP1616 (Fourth Edition, March 2021) process, this ACP was graded as a level 2C ACP. It was further endorsed by CAA that the SARG Policy Statement 115 for the Establishment of an Aerodrome Traffic Zone (ATZ) would be the principal guidance for this ACP. In November 2023, and in anticipation of the Fifth Edition of the CAP1616, the CAA notified the Change Sponsor that this ACP is to be reclassified and downgraded to a Level 3 ACP<sup>1</sup> due to the low impact on both aviation and non-aviation stakeholders.

The engagement period commenced on Wednesday 17<sup>th</sup> November 2023 and ended on Wednesday 12<sup>th</sup> January 2024. The engagement was hosted on the CAA's online consultation portal, Citizen Space and directly distributed to specified stakeholders via email, and non-specified stakeholders through the National Air Traffic Management Advisory Committee (NATMAC).

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<sup>1</sup> Email CAA to Osprey dated 31 October 2023 (16:37).

## 2 Engagement Approach

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### 2.1 Approach: How will we Engage?

The principal form of engagement was through direct email correspondence with the Stakeholders (Annex 2). The email contained both the proposal material for stakeholder review and guidance to stakeholders on the official engagement period.

The engagement was hosted on the CAA Consultation Hub 'Citizen Space', a public online consultation platform for sharing information about Airspace Change Proposals. This portal holds relevant information for interested parties and stakeholders, including the engagement material/document which outlines the details of the proposed changes and their potential impacts.

The outline of the engagement period, as agreed with CAA, would consist of an eight-week period, with a mid-period email reminder to all stakeholders. The length of the ACP engagement period is deemed appropriate in-line with a Level 3 ACP and the establishment of an ATZ policy statement<sup>2</sup>, compared to a high graded ACP level. This is principally due to a limited number of available options when a) establishing an ATZ, and b) options for ATZ lateral limits.

### 2.2 Engagement Stakeholders – The Audience

The engagement activity aims to connect with a diverse audience. A list of stakeholders was identified (Annex 1) for this ACP process and the Change Sponsor intends to conduct engagement with this set of stakeholders.

#### 2.2.1 National Organisations

The Change Sponsor engaged with the National Air Traffic Management Advisory Committee (NATMAC) and requested that information is forwarded to their members for onward transmission to their respective organisations.

#### 2.2.2 Ministry of Defence (MOD)

As a mandatory stakeholder in all airspace change, the Change Sponsor also directly engaged with the MOD through individual stakeholders and their ATM organisation (DAATM).

#### 2.2.3 Adjacent Airports / Air Navigation Service Providers

During the projects initial geospatial evaluation of stakeholders, Bournemouth International Airport (BIA) was identified as the nearest major aviation hub to Portland Heliport. The distance between BIA and Portland Heliport was used to define an area of interest (AOI) surrounding Portland Heliport. This AOI highlighted several key local Air Navigation Service Providers (ANSPs) and Airports in which the Change Sponsor will continue to work closely throughout this ACP.

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<sup>2</sup> SARG policy statement 115 – Aerodrome Traffic Zones (ATZ) – Dated 19 December 2019

#### **2.2.4 Local General Aviation**

The Change Sponsor engaged with General Aviation (GA) community through NATMAC and directly where local GA clubs and airfields were likely to be interested in changes and access to local volumes of airspace; these organisations are listed in Table 6 at Appendix A2.

#### **2.2.5 Non-Aviation Government Facilities**

Portland is uniquely situated and near HM Prisons on the Portland Peninsula. Due to the proposed lateral limits of a 2nm ATZ and collocated FRZ proposal, HM Prison Governors will be directly engaged to comment on any potential impacts.

### **2.3 Engagement Document**

The engagement documentation (Annex 2) provided information on the proposed change and the options that were being considered. These engagement materials sought to provide those engaged with sufficient information to form a reasonable understanding of proposed change so they would be able to respond with a clear description of how they might be affected. The engagement material was written in clear and accessible language and included a non-technical explanation for non-specialists, as far as this is possible.

#### **2.3.1 Reminders**

The Change Sponsor sent a follow-up email just at the mid-point of the engagement (4-weeks after the launch) to the targeted stakeholders reminding them of the closing date.



## 3 Summary of Engagement Responses

### 3.1 Introduction

The Change Sponsor has now completed the CONSULT/ENGAGE phase of this ACP which seeks to introduce an Aerodrome Traffic Zone (ATZ) and a co located Flight Restriction Zone (FRZ) encompassing Portland Heliport.

The timeline for this proposed airspace change is currently driven by an agreed target implementation date of Aeronautical Information Regulation and Control (AIRAC) 07/2024; the earliest AIRAC to feasibly document and establish the ATZ and FRZ. This timeline was provisionally agreed by the CAA regulator and published on the airspace portal.

Following the CAA agreed eight-week engagement period, CAP 1616 requires the change sponsor to carry out a fair, transparent, and comprehensive review, and categorisation of responses. To meet this criterion, the Change Sponsor has reviewed all the responses and categorised them to highlight those that present information that may lead to a change in the intended design, and those that will not.

### 3.2 Engagement Responses and Categorisation

Of the specified 23 stakeholders (not including NATMAC) directly engaged, the Change Sponsor received seven responses, giving a response rate of 30%.

Although the engagement approach utilised the CAA Citizen Space platform and the wider NATMAC network to improve transparency, extend publicity, and broaden engagement, and despite the additional mid-point emails, no further stakeholders engaged with the Change Sponsor.

The following responses detail the stakeholder feedback and the categorisation assessment.

	<b>██████████ - Exeter Airport</b>
Do you support the proposed Airspace Change Proposal?	Indifferent
<p>Good afternoon.</p> <p>I have reviewed ACP-2022-050 which proposes the introduction of a new Air Traffic Zone (ATZ) and a Flight Restriction Zone (FRZ) located at Portland Heliport. This proposal would not adversely affect operations at Exeter therefore our position is one of indifference.</p> <p>Thank you.</p> <p>██████████</p>	
Preferred Option:	None provided.



Response Statement:	None required.
CAP 1616 Categorisation:	<b>Response which does not impact the final proposal - the content of this response does not include new information or ideas that could lead to an adaptation in a lead design option or a new design option.</b>
None required.	
Reference:	Annex 4.1

██████████	██████████ - Yeovil Westland Airport
Do you support the proposed Airspace Change Proposal?	Positive.
<p>Hi ██████████</p> <p>The proposal has been disseminated around the Flight test Pilots with no concerns on it and general consensus that it would be good to have a frequency to talk to for when flying in the Portland area.</p> <p>Regards</p> <p>████████████████████</p>	
Preferred Option:	None provided.
Response Statement:	None required.
CAP 1616 Categorisation:	<b>Response which does not impact the final proposal - the content of this response does not include new information or ideas that could lead to an adaptation in a lead design option or a new design option.</b>
None required.	
Reference:	Annex 4.2

██████████	<b>Plymouth Radar Mil - ██████████ FOST</b>
Do you support the proposed Airspace Change Proposal?	See Defence Airspace & Air Traffic Management (DAATM) for response.
<p>Good afternoon ██████████</p> <p>Thank you for sight of this document. I will provide feedback through the Airspace manager and a formal response from Navy will come via DAATM.</p> <p>Yours Aye, ██████████</p> <p>██████████</p>	

Happy to support in drafting an LOA/MOU with you and your team to provide evidence for the ACP application.	
Yours Aye, [REDACTED] (12/01/24)	
Preferred Option:	None provided.
Response Statement:	None required.
CAP 1616 Categorisation:	<b>Response which does not impact the final proposal - the content of this response does not include new information or ideas that could lead to an adaptation in a lead design option or a new design option.</b>
None required.	
Reference:	Annex 4.3 to 4.4

[REDACTED]	<b>Defence Airspace &amp; Air Traffic Management (DAATM) - [REDACTED]</b>
Do you support the proposed Airspace Change Proposal?	Supported with caveated considerations.
<p>Good Morning [REDACTED]</p> <p>Thank you for the reply. The MOD can confirm that this extra information has helped to clarify the wording used in Items 2 and 3.</p> <p>Regarding Item 1, the MOD would concur that a non-standard ATZ would be the preferred option and in either case are content that there will be no impact to activation of, and activities within, D014. Any requests for an LoA or DACS provision outside of published D014 activation times, should be directed to FOST in the first instance. However, DACS will not be provided by the MOD if D014 is not active.</p> <p>Please do not hesitate to contact myself or [REDACTED] if you require further information.</p> <p>Regards [REDACTED]</p>	
Preferred Option:	Establishment of a non-standard ATZ
Response Statement:	Yes – Reference A4.7 Response 04D
CAP 1616 Categorisation:	<b>This response provides support for the establishment of a non-standard ATZ at Portland Heliport, a Caveat that no existing overlap of lateral limits between Danger Area EGD014 and an ATZ/FRZ are permissible. The Response has influenced the final proposal and has led to an adapted ATZ formation of a non-standard shaped ATZ which will</b>

	<b>omit any Danger Area overlap as part of the ATZ boundary.</b>
None required.	
Reference:	Annex 4.5 to 4.9

	<b>██████████ HMP/YOI Portland</b>
Do you support the proposed Airspace Change Proposal?	Yes
<p>Hello ██████████</p> <p>Could you update your records to reflect me as ██████████ HMP/YOI Portland please? In response to the request, I would welcome the restrictions as it can only improve the security at my prison.</p> <p>Kind Regards</p> <p>Pete ██████████</p>	
Preferred Option:	None provided.
Response Statement:	None required.
CAP 1616 Categorisation:	<b>Response which does not impact the final proposal - the content of this response does not include new information or ideas that could lead to an adaptation in a lead design option or a new design option.</b>
None required.	
Reference:	Annex 4.10

	<b>██████████ - ██████████ Wykes Regis Training Area (WRTA)</b>
Do you support the proposed Airspace Change Proposal?	No objections
<p>Good morning ██████████</p> <p>Having reviewed the proposal we have no objections to the establishment of airspace or FRZs around the Portland Aerodrome so long as any associated procedural design, or subsequent flight profiles, don't introduce increased risk to aircraft operating to/from or related to the Wyke Regis Training Area.</p> <p>Regards</p> <p>████████████████████</p>	
Preferred Option:	None provided.



Response Statement:	None required.
CAP 1616 Categorisation:	<b>Response which does not impact the final proposal - the content of this response does not include new information or ideas that could lead to an adaptation in a lead design option or a new design option.</b>
None required.	
Reference:	Annex 4.11

	<b>██████████ - Wessex Han Gliding &amp; Paragliding Club</b>
Do you support the proposed Airspace Change Proposal?	No objections (Query)
<p>Dear ██████████</p> <p>Please find attached the Wessex Hang Gliding and Paragliding Club response to the Portland Heliport CAP 161 ACP-2022-050 Stakeholder Engagement document.</p> <p>I am sending this as the ██████████ for the club. Up to date contact details for the club committee can be found at <a href="http://www.wessexhgpg.org.uk">http://www.wessexhgpg.org.uk</a></p> <p>Best wishes</p> <p>██████████</p>	
Preferred Option:	None provided.
Response Statement:	Yes – Reference A4.7 Response 04D
CAP 1616 Categorisation:	<b>Response which does not impact the final proposal - the content of this response does not include new information or ideas that could lead to an adaptation in a lead design option or a new design option.</b>
None required.	
Reference:	Annex 4.12 to 4.14

### 3.3 Summary or Response Themes against Response Categorisation

Figure 1 (below) shows a graphical representation of the responses to the ACP engagement phase of the airspace change proposal. From the seven stakeholder responses received, five gave support to the ACP, one stakeholder was indifferent, and one stakeholder sent a query regarding ATZ airspace limitations.

The responses to this ACP engagement have been mapped directly against the Stakeholder list (Annex 1), and no responses were received from other non-specified stakeholders, such as from the material published on Citizen Space and from the NATMAC community.

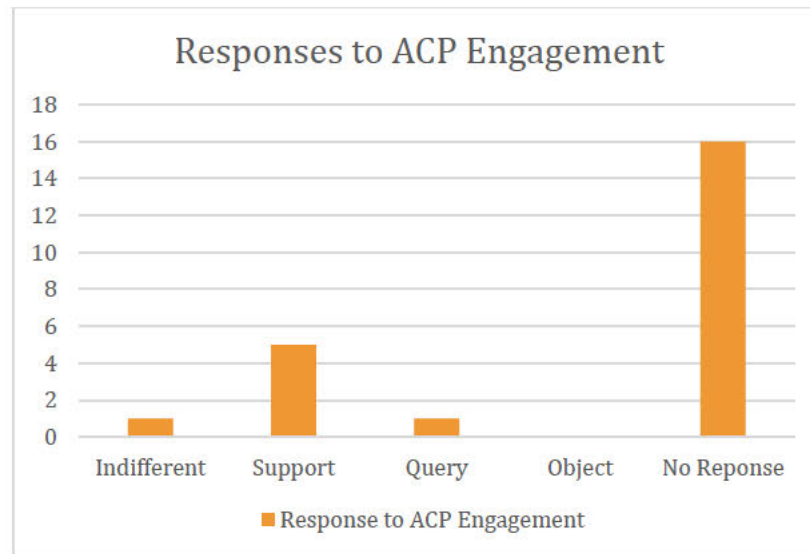


Figure 1 - Response to ACP Engagement Options

The Tables below (Tables 1 & 2) show an overview of all engaging stakeholders and their responses to the proposed establishment of a Portland Heliport ATZ/FRZ. Table 1 lists the stakeholder responses which have had no impact on options development, whilst Tables 2 shows the stakeholders who have directly contributed to further options development.

Response ID	Organisation Type	Do you support the airspace changes in this proposal	Elected Option (if applicable)
01	Exeter Airport	Indifferent	None provided.
02	Yeovil Westland Airport	No concerns on it [ATZ/FRZ establishment] and consensus are that it would be good to have a frequency to talk to for when flying in the Portland area	None provided.
03	Plymouth Radar Mil	Will formally respond via DAATM.	None Provided (See Resp-04)
05	HMP /YOI Portland	I would welcome the restrictions as it can only improve the security at my prison	None provided.



Response ID	Organisation Type	Do you support the airspace changes in this proposal	Elected Option (if applicable)
06	Wykes Regis Training Area (WRTA)	No objections to the establishment of new airspace or FRZ at Portland.	None provided.
07	Wessex Para Gliding and Hang-Gliding Club	Request for further information on how the Class G ATZ may impact Para/Hang Glider activity.	None provided.

Table 1 - Summary of Responses with No Impact on Options Development

Response ID	Organisation Type	Do you support the airspace changes in this proposal	Elected Option (if applicable)
04	DAATM	Support the establishment of an ATZ.	Caveated: No ceding of DA primacy to proposed ATZ/FRZ during activation.

Table 2 - Summary of Responses which have had an Impact on Options Development

Table 2 highlights DAATM have raised this ACPs single concern on the establishment of an ATZ at Portland Heliport. The controlling authority for the danger area (EG D014 – Portland) have stated that they will not permit any controlling authority over the area during its times of operations.

### 3.4 Future Options Development

The main stakeholder response to the engagement phase has been from DAATM (and Plymouth Mil). Geographically, the proximity of EG D014 has always been anticipated to have a relational impact on the establishment of an ATZ / FRZ at Portland Heliport (Figure 2). DAATM’s response to the engagement material generally outlined their full support for the establishment of an ATZ at Portland Heliport. However, their response has been caveated stating that the any ATZ overlap of EG D014 should not take primacy over any part of the Danger Area during its activation period (see A4.8).

The Ministry of Defence routinely consolidates its ATM responses, such as ACPs, through the MOD organisation DAATM. Subsequently, since DAATM published their preference proposed ATZ option to the Change Sponsor, the Controlling Authority for the Portland danger area (EG D014 - Portland) has offered to facilitate and support the drafting of an agreement with Portland Heliport (see A4.4). This agreement between the two bodies would be key to facilitating the actual operational and safe usage of an ATZ boundary area which overlapped into the neighbouring danger area.

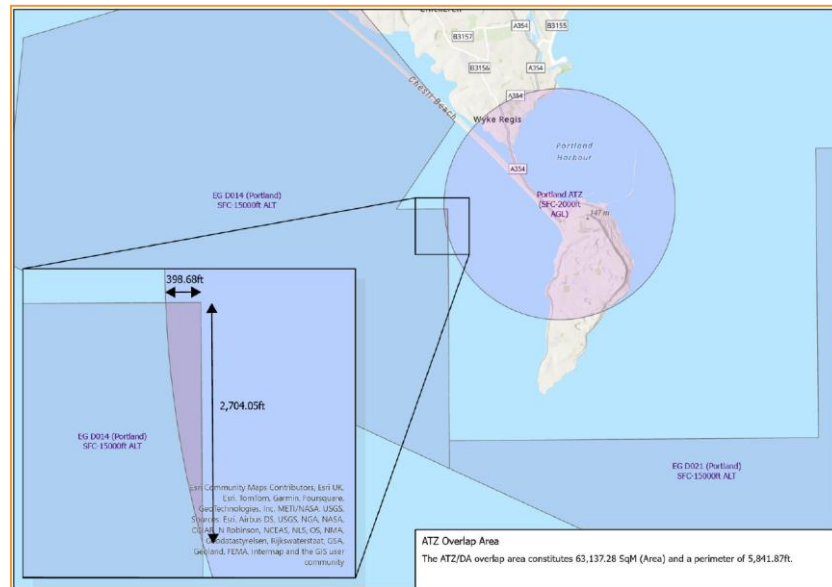


Figure 2 - Representation of a standard 2nm ATZ/FRZ overlap of EG D014.

The DAATM caveat has led to the development of two further ACP options (for options a-c see engagement material (Annex2)). These expanded options are both derived from the original published Option c.

- Option ci:** The establishment of a standard 2nm ATZ, and collocated FRZ (based on the Portland Heliport Aerodrome Reporting Point (ARP)). The ATZ overlap area of EG D014 would not cede primacy to the DA Controlling Authority during its activation times. An agreement to determine controlling authority periods between the proposed ATZ and EG D014 (Portland) will be established via MOU or LOA between Portland Heliport and the danger area Controlling Authority.

**Considerations of Option ci:** This option retains the standard 2nm dimensions of a standard ATZ/FRZ<sup>3</sup>. However, any boundary overlaps between EG D014 and the proposed ATZ brings a complexity of divided controlling authorities.

DAATM have stated that during the operational timings of the danger area, the ATZ overlap area would be ceded to the danger areas controlling authority. However, during non-activation timings of the danger area, the Danger Areas Crossing Service (DACS) stipulates, in the Civil AIP, a continual controlling authority to Swanwick Mil via London Information frequency<sup>4</sup>.

This option would require a formal Letter of Agreement (LOA) or Memorandum of Understanding (MOU) between both parties to be put in place prior to ATZ/FRZ activation.

<sup>3</sup> SARG policy statement – Aerodrome Traffic Zones (ATZ) – Dated 19 December 2019

<sup>4</sup> UK Civil AIP: ENR 5 Navigational Warnings, ENR 5.1 Prohibited, Restricted and Dander Areas



- **Option cii:** The establishment of a nonstandard 2nm ATZ, and collocated FRZ (based on the Portland Heliport ARP). The lateral limits of the nonstandard ATZ /FRZ will contour the boundary of EG D014 as shown in Figure 3.

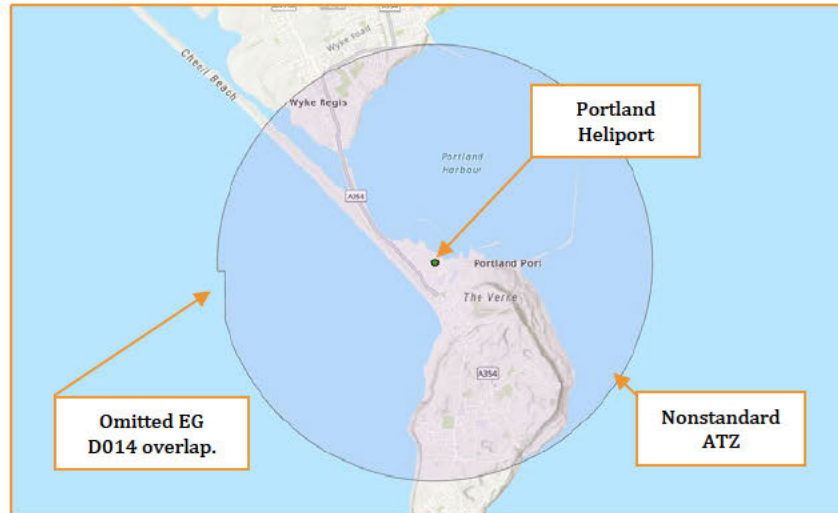


Figure 3 - Representation of Portland Heliport's proposed nonstandard ATZ

**Considerations of Option cii:** This option removes both the ATZ overlapping area from the ATZ lateral limits as well as any shared controlling authority dependencies.

Whilst losing approximately 63,000 Sq. Meters of a standards 2nm ATZ, this option could also be argued to be the safer option than option ci. Air users when operating in the vicinity of Portland Heliport may become confused as to controlling authority timings for that section of the ATZ and enter the area during danger area activation periods.

### 3.4.1 DAATM's Preferred Option

Throughout the engagement phase and in subsequent correspondence with stakeholders, DAATM have declared their preferred option to be the nonstandard ATZ (and by association a nonstandard FRZ).

### 3.5 Safety Assessment

A more detailed assessment of options ci and cii has been included in the ACP Safety Assessment and has been submitted to the CAA for review. As some of the information within the Safety Assessment is deemed commercial in confidence to the Change Sponsor, the Safety Assessment will not be uploaded to the CAA Airspace Change Portal for public review.

## 4 Conclusion

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### 4.1 Conclusion

The CAA approved eight-week engagement period has drawn a minimal number of responses from identified stakeholders. However, this period was considered by CAA to be a sufficient period to allow stakeholders enough time to consider the proposal and discuss the options before providing a response. This period has allowed all aviation and non-aviation stakeholders an opportunity to contribute to the airspace change proposal.

Having received no objections to the proposed establishment of a 2nm ATZ/FRZ at Portland Heliport, the Change Sponsor wishes to proceed to the submit stage of the ACP process. Having fully considered the supporting Safety Assessment alongside stakeholder responses, the Change Sponsor has elected for option **cii** which is the establishment of a non-standard 2nm ATZ/FRZ at Portland Heliport. Details of the ATZ application can be found in the Policy Statement 115 – Appendix 1 Application document attached to this ACP submission.

### 4.2 Next Steps

As a Level 3 ACP (effective 02 January 2024), and in agreement with CAA, the Change Sponsor is now submitting this document and other supporting documentation to CAA on the 19<sup>th</sup> January 2024. The Change Sponsor understands the CAA will review and evaluate the Portland Heliport ACP (ACP-2022-050) submission over a ten-week period. This submission includes:

- a. Engagement material including: Collation, categorisation and review of responses.
- b. Safety Assessment.
- c. SARG Policy Statement 115 for the Establishment of an Aerodrome Traffic Zone (ATZ) – Appendix 1 Application.

A CAA decision is anticipated on or around 29<sup>th</sup> March 2024. Should the CAA decision result in a positive ACP outcome, and accounting for any required conditions and recommendations CAA may add, this ACP will advance to the IMPLEMENTATION stage of the ACP process<sup>5</sup>.

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<sup>5</sup> [Iaw SARG Policy 115: Establishment & Dimensions of an ATZ – 19 December 2019 – Annex B](#)

# A1 List of Key Stakeholders

## A1.1 Introduction

The following table represents the key stakeholder organisations and individuals identified by the Change Sponsor as potentially being affected by the proposal.

Type	Stakeholders
General	NATMAC
Ministry of Defence	DAATM
	Plymouth Mil Radar
	Royal Naval Air Station (RNAS) Yeovilton
	Royal Naval Air Station (RNAS) Merryfield
	Ministry of Defence Boscombe Down Aerodrome
	Lulworth / RAC Gunnery School Helicopter Landing Site
	Weymouth / Chickerell Helicopter Landing Site
Civil and General Aviation	Bournemouth International Airport (BIA)
	Compton Abbas Airfield
	Yeovil-Westland Airport
	Exeter Airport
	Henstridge Airfield
Aviation Clubs and Associations	ARPAS UK
	Dorset Gliding Club
	Lasham Gliding Society
	Wessex Hang Gliding & Paragliding Club
	Grey Arrows Drone Club UK
Other Stakeholders	UK Coastguard (Bristows)
	Portland Harbour Master

Type	Stakeholders
	National Police Air Service (NPAS)
	Dorset & Somerset Air Ambulance
	HMP The Verne
	HMP Youth Offenders Institute Portland

Table 3 - List of Stakeholders

## A2 Engagement Material

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Annex 2 contains a replication of the ACP engagement material submitted to stakeholders for review between 17<sup>th</sup> November 2023 to 12<sup>th</sup> January 2024.

Date: 17/11/2023  
Ref: ACP-2022-050  
Osprey Ref: 71743-004

Dear Stakeholder,

### **Portland Heliport CAP 1616 ACP-2022-050 - Stakeholder Engagement**

#### **Invitation for Stakeholders to Comment**

The purpose of this document is to invite recipients to comment on the proposed changes, detailed herein, with respect to the implementation of an Aerodrome Traffic Zone (ATZ) and a Flight Restriction Zone (FRZ) at the Portland Heliport situated on the Isle of Portland in southern Dorset. In accordance with regulatory guidelines, Portland Heliport are eager to receive any feedback from stakeholders who feel they might possibly be affected by its planned changes.

The introduction of an ATZ and FRZ will enhance safety and efficiency for aircraft operating in the area. The ATZ will provide a controlled airspace environment for helicopters and other aircraft, reducing the risk of mid-air collisions. It will also provide a dedicated frequency for pilots to communicate with air traffic control, improving situational awareness and coordination. The ATZ will be implemented in conjunction with an Aerodrome Flight Information Service (AFIS), which will provide pilots with essential information about the heliport and the surrounding airspace. The ATZ and AFIS will work together to ensure that all aircraft operating in the area are aware of each other and can safely coexist.

#### **Stakeholder Responses**

Stakeholders are requested to respond with their views on this proposal, via one of the following methods, before **12<sup>th</sup> January 2024**:

- CAA Airspace Change Portal ([Link](#))
- CAA Citizen Space page ([Link](#))
- Email ([Link](#))

#### **Background**

The Airspace Change Proposal (ACP) had been raised in accordance with CAA's CAP 1616<sup>6</sup>. Portland Heliport (ICAO Code EGDP) is situated in Class G airspace and is operated by the defence contractor HeliOperations Ltd, governed by the Civil Aviation Authority. Portland became a licenced heliport in October 2023. At present, Portland Heliport provides direct support to rotary activity for the Royal Navy (RN), Joint Helicopter Force (JHF), and alliance

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<sup>6</sup> Airspace Change – Guidance on the regulatory process for changing the notified airspace design and planned and permanent redistribution of air traffic, and on providing airspace information.



operations conducted in and around the vicinity of Portland and within the Portland Danger Area (DA) complex. Figure 4 (below) shows a three-dimensional depiction of the overseas DAs EG D014 (Portland West) and EG D021 (Portland East) in relation to Portland Heliport.

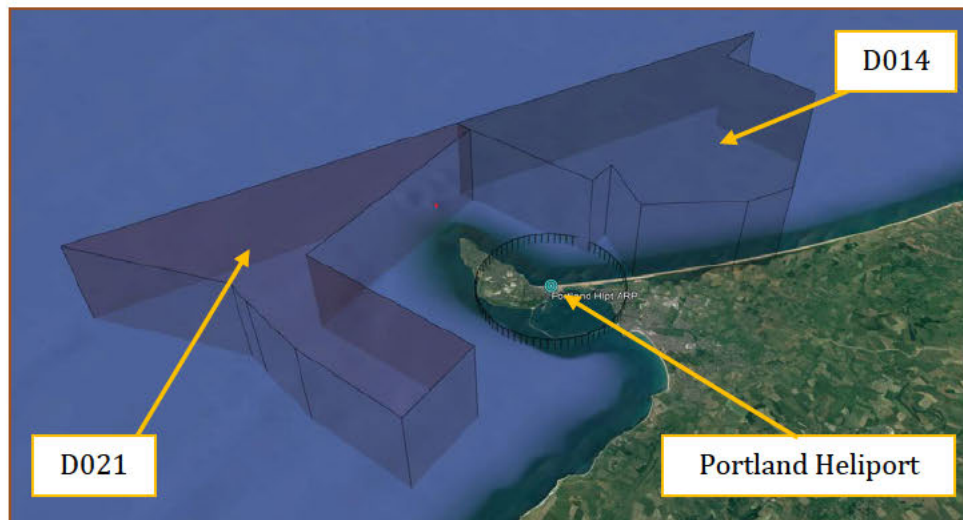


Figure 4 – Portland Heliport in proximity to the Portland Danger Area complex, with a 2NM circle representing the proposed ATZ

### Published Aeronautical Information

Throughout 2023, Portland Heliport has undergone the CAA’s regulatory licencing process and was officially granted a heliport licence on 5<sup>th</sup> October 2023. Portland Heliport aeronautical information is now published by NATS in the UK Civil Aeronautical Information Publication<sup>7</sup> (AIP) under AD3 EGDG (Portland). Figure 2 (below) depicts Portland Heliport’s inbound and outbound flight procedures published in the UK Civil AIP.

### Requirement for Airspace Change Proposal

HeliOperations Ltd, the operator of Portland Heliport, have identified that the ‘Loss of Safe Separation with other airspace users’ is one of their top six significant risks that represents a potential hazard to the heliport operation. To address this risk, HeliOperations Ltd have instigated an airspace change proposal that aims to address the requirement to protect air users, particularly during the critical stages of flight when aircraft are departing and arriving at Portland Heliport.

### Statement of Need

The following Statement of Need (SoN) was submitted to CAA in September 2022, and an ACP Assessment Meeting was held with the CAA on 21<sup>st</sup> September 2022 to discuss the Statement of Need (SoN). The SoN states the following and is a direct copy of the initial SoN submission (Items 6-10):

<sup>7</sup> UK Civil Aeronautical Information Publication – AIRAC 11 (Effect 02 Nov 2023)

Portland Heliport is located within Class G Airspace near Portland Harbour, Dorset, and currently comes under the broad jurisdiction of the Military Aviation Authority (MAA)<sup>8</sup>. The Heliport is an ex-military establishment and has been operated by HeliOperations Ltd since 2017 and their current focus is to deliver flying training of Search and Rescue Pilots to the Federal German Navy in Sea King Mark 5 aircraft.

The Heliport is utilised 5 days a week<sup>9</sup>, with occasional weekend activity, for flying training and supports the UK MOD including the Royal Navy and Joint Helicopter Force whilst they conduct operations, including those within the Portland Danger Area complex, which can often be at short notice, or out of hours.

Due to the nature of the flying training operations at the Heliport, and to improve safety during the critical stages of flight for aircraft with significant wake vortex, HeliOperations Ltd wish to establish an Aerodrome Traffic Zone (ATZ) to assist in protecting the aerodrome traffic on the manoeuvring area and air traffic in the immediate vicinity of the Heliport during landing/take-off. In addition, the establishment of an associated Flight Restriction Zone (FRZ) of the same dimensions as the proposed ATZ would also enhance safety for other airspace users within the vicinity of the aerodrome and further protect users of the aerodrome during the critical stages of flight.

### Proposed Airspace Solution

Both the ATZ and FRZ coupled with an AFIS<sup>10</sup> would reduce the potential for an incident in the vicinity of the aerodrome as pilots and operators would be able to obtain information from Portland Heliport to enable their flights to be conducted safely within the Zone. Furthermore, there would be an increase in situational awareness of all known traffic in close proximity to the heliport by those transiting by maintaining a continuous monitoring for incoming communications on a specific frequency.

It is understood that the establishment of an ATZ will be progressed as a Level 2C airspace change in accordance with CAP 1616 Airspace Design and it is assumed that this proposal would be considered in accordance with the CAA SARG ATZ Policy dated December 2019.

Due to the recent amends of CAP 1616 (effective 2nd January 2024), the CAA has notified the Change Sponsor that this ACP will be progressed as a Level 3 Airspace Change.

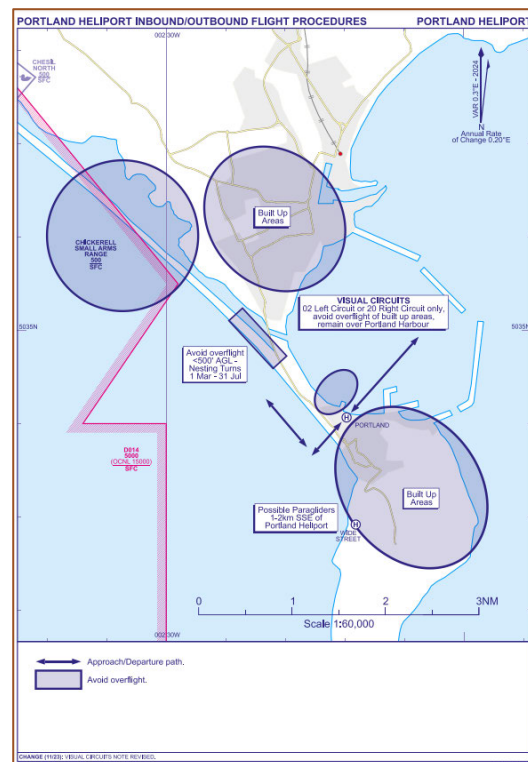


Figure 5 - AD 3-EGDP-4-1 Portland Heliport inbound/Outbound Flight Procedures (UK Civil AIP (NATS))

<sup>8</sup> SoN submitted September 2022. From Oct 2023, Portland Heliport comes under CAA authority as a licenced heliport.

<sup>9</sup> Proposed new timings should read: Monday - Thursday 0900-1600 (0800-1500Z) and Fri 0900-1200 (0800-1100Z). Outside Hours by NOTAM.

<sup>10</sup> Current AFIS includes a AGROM capability, Portland is aspiring to FISO post the successful ACP implementation.



## Benefits of this Airspace Change

The establishment of an ATZ and a co-located FRZ should result in the following benefits:

- Improved positive two-way communication between Portland, military, and GA users due to the Portland Heliport AFIS and potential system upgrade.
- An increase of situational awareness due to the provision of published Heliport and traffic information during ATZ opening hours.
- An enhancement of mitigation to reduce the likelihood of loss of separation, which could lead to possible Airprox and/or Mid-Air Collision.

## Considered Options.

During consideration of mitigation options for the identified risks, the following potential solutions studied:

- a. **Do Nothing.** This would not address any of the communication, control and safety concerns that led to this ACP.
- b. **Propose an ATZ<sup>11</sup>.** An ATZ is defined as a cylindrical volume of airspace around a licensed civilian aerodrome. An ATZ is established to provide protection to aircraft during the critical stages of flight when departing, arriving, and flying in the vicinity of an aerodrome. As the 'Do Minimum' option, an ATZ would provide access to airspace in accordance with Rule 11 and this solution addresses some communication and safety concerns.
- c. **Propose an ATZ, with a collocated FRZ<sup>12</sup>.** The addition of an FRZ which is defined as a cylindrical volume of airspace which mirrors the dimensions of an aerodrome ATZ. The establishment of an FRZ<sup>13</sup> would further protect the heliport from unauthorised drones and UAVs operating without permission within the vicinity of Portland<sup>14</sup>.

Due to location of Portland, and the nature of the flying training operations at the Heliport, and to improve safety during the critical stages of flight for aircraft with significant wake vortex, HeliOperations Ltd wish to establish an ATZ with a co-located FRZ.

## Engagement with the MoD

Portland Heliport is currently used by the MoD to support their operations. The current proposal for an ATZ/FRZ of 2nm will infringe slightly into DA 014 (Portland West). Figure 6 (below) depicts the ATZ/FRZ volume of airspace affected by this infringement.

The Change Sponsor has commenced engagement with the Defence Airspace and Air Traffic Management (DAATM) organisation and will engage with the controlling authority of DA 014 (Portland West) to ensure that any potential infringements and concerns are safely mitigated via a letter of agreement (LOA), if deemed required.

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<sup>11</sup> [SARG Policy 115: Establishment & Dimensions of an ATZ – 19 December 2019](#)

<sup>12</sup> [Airspace restrictions for remotely piloted aircraft and drones \(CAA Website\)](#)

<sup>13</sup> [Air Navigational Order 2019 – Section 4.](#)

<sup>14</sup> [CAP 722 – Unmanned Aircraft System Operations in UK Airspace – Policy & Guidance.](#)

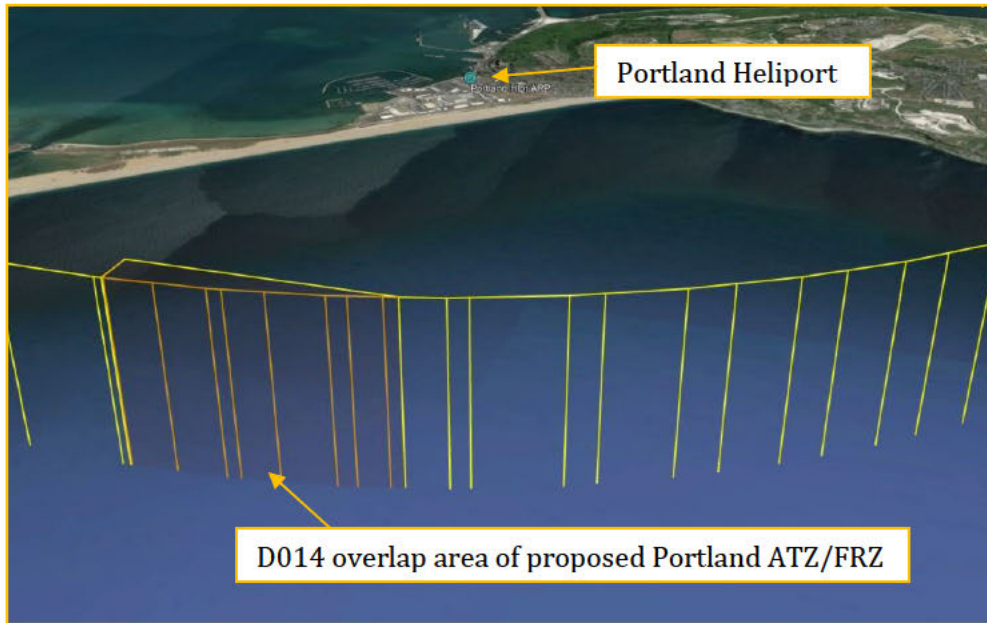


Figure 6 - Depiction of ATZ/FRZ and Danger Area (DA) D014 interaction.

#### Aeronautical Information Publication Amendments<sup>15</sup>.

Subject to formal ACP approval by CAA, the following documents will be amended:

- a. **Civil AIP.**
  - 1) ENR 2.2 Other Regulated Airspace (ATZ).
  - 2) ENR 5 Navigation Warnings (FRZ)
  - 3) AD 3.16 (EGDP) Air Traffic Services Airspace (ATZ/FRZ)
- b. **NOTAM.** A permanent NOTAM would be raised to notify the aviation community, between any CAA approval and formal AIRAC cycle change.
- c. **Aeronautical Information Circular (AIC).** An AIC would be raised should the NOTAM notification option (b) for the UK Civil AIP entry exceed a three-month period, and a reissuance of the NOTAM is deemed inappropriate due to timeframes.

#### Summary

This ACP proposal is aimed at improving safety for all aviation users operating within close proximity to Portland Heliport and the surrounding area. The Change Sponsor would welcome comment and feedback as detailed at paragraph 0.

<sup>15</sup> SARG Policy 125: Aeronautical Data Associated with CAP 1616 Airspace Changes – 21 April 2022

## A3 Stakeholder Engagement Communications

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### A3.1 Forms of Engagement

The Portland Heliport ACP Change Sponsor has approached the ENGAGEMENT phase of the airspace change process through the adoption of two methods of engaging with the stakeholder community. The first method adopted a targeted approach which identified key stakeholders (See Annex 1) which are more likely to have a direct investment on the outcome of this ACP. These key stakeholders were directly emailed with the engagement material and asked for comment. The second approach took an indirect and more open-sourced route by promoting the ACP engagement material on CAA's Citizen Space website. This approach provided a fully transparent engagement mechanism which allows non-identified stakeholders to comment on the ACP.

#### A3.1.1 Initial Engagement Email

An email was sent (17<sup>th</sup> November 2023) to identified stakeholders informing them of the engagement launch and included the engagement materials (Annex 2).

*Dear Stakeholder,*

**Proposed establishment of an Air Traffic Zone and Flight Restricted Zone at Portland heliport.**

*Osprey Consulting Services Ltd have identified you as a key stakeholder to the above engagement and would like to invite you to respond to the proposed introduction of a new Air Traffic Zone (ATZ) and a Flight Restriction Zone (FRZ) located at Portland Heliport.*

*The engagement is open for 8 weeks from 17<sup>th</sup> November 2023 to 12<sup>th</sup> January 2021.*

*The engagement material is available, either through CAA's Citizens Space page, the CAA Airspace Change Portal, or attached to this email.*

*Please can I request you take the time to consider this proposal and respond via one of the methods described in the engagement material.*

*All feedback is valuable, whether you support, object or are indifferent to these proposed changes.*

*Thank you in advance.*

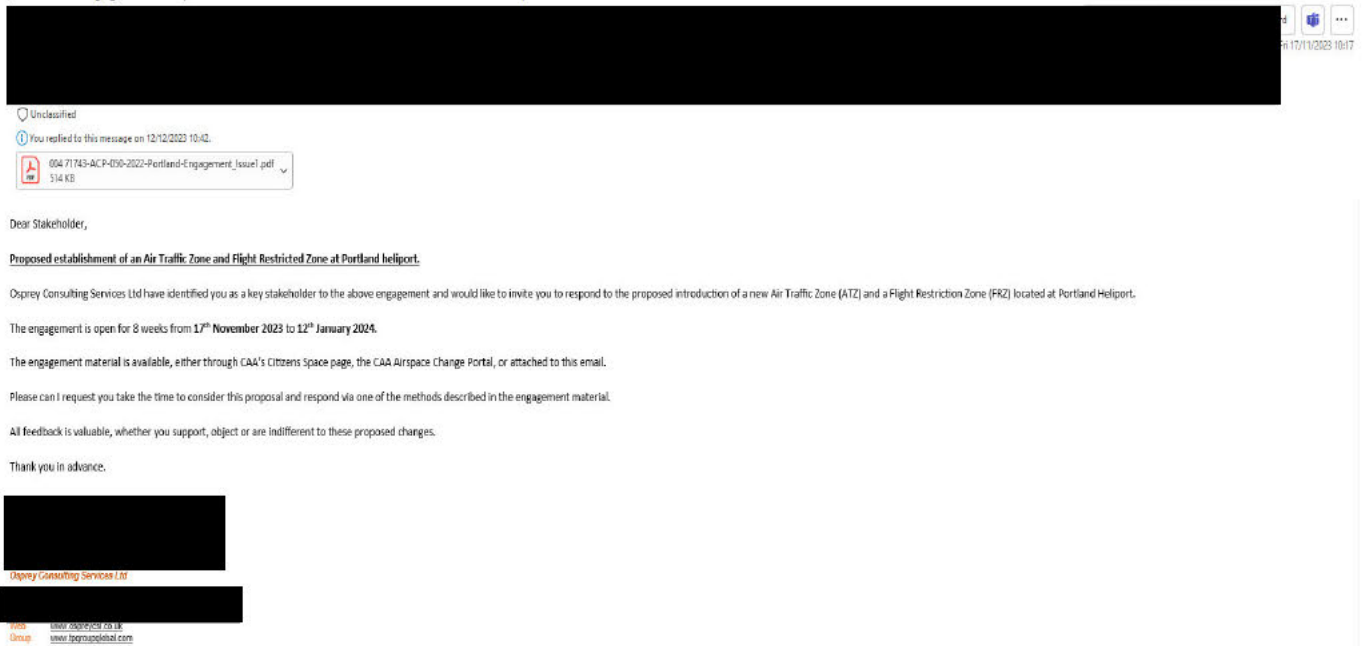
████████████████████ ████████████████████

████████████████████ – Airports & Airspace

**Osprey Consulting Services Ltd**

### A3.2.1 Email Evidence – Initial Engagement Email to Stakeholders

20231117-Engagement: Proposed establishment of an ATZ and FRZ at Portland Heliport.



### A3.3.1 Mid-Engagement period Remainder Email

An email reminder was sent to identified Stakeholders who had not responded by the mid-point of the engagement period (12<sup>th</sup> December 23).

*Dear Stakeholder,*



**Mid-Engagement Reminder Notice.**

*Please see the email below relating to an engagement being undertaken by Osprey CSL regarding the **Proposal establishment of an Air Traffic Zone (ATZ) and Flight Restricted Zone (FRZ) at Portland Heliport** which commenced 17<sup>th</sup> November 2023.*

*If you have already responded thank you for your time. If not, this engagement closes on the 12<sup>th</sup> January 2024 (in 4 weeks' time). If you would like to provide feedback, then please do so before this date.*

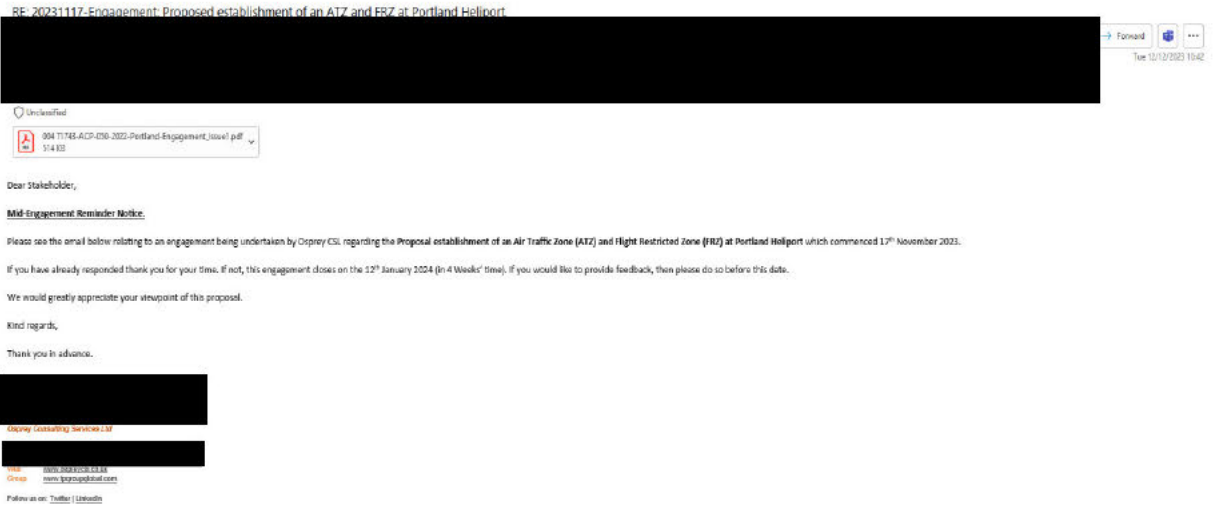
*We would greatly appreciate your viewpoint of this proposal. Thank you in advance.*

*Kind regards,*

  
 – Airports & Airspace  
**Osprey Consulting Services Ltd**



### A3.4.1 Email Evidence - Mid-Engagement period



### A3.5.1 Citizen Space

Below is a snapshot of the public engagement of this ACP via the CAA's Citizen Space platform.

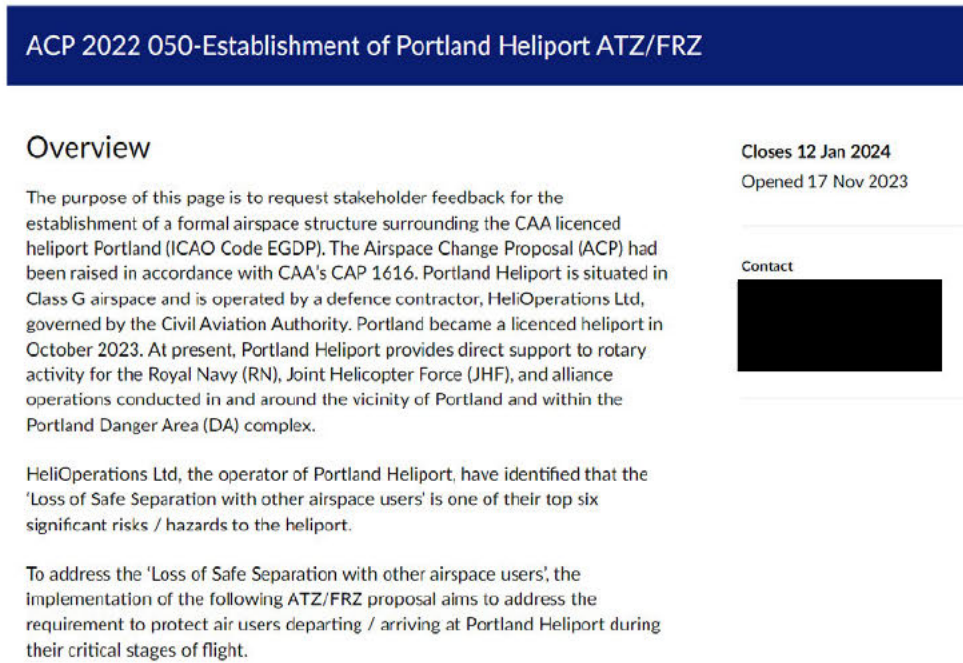


Figure 7 - Citizen Space public engagement page<sup>16</sup>

<sup>16</sup> [Citizen Space – ACP 2022.050-Establishment of Portland Heliport ATZ/FRZ](#)

## A4 Stakeholder Response Evidence

Response Reference	Corresponding Organisation	Date	Correspondence Type
A4.1 – Response 01	Exeter Airport	19/11/23	Email Response
A4.2 – Response 02	Yeovil-Westland Airport	02/01/24	Email Response
A4.3 – Response 03	Plymouth Military Radar	04/12/23	Default decision to DAATM
A4.4 – Response 03A	Plymouth Military Radar	12/01/24	Supporting LOA/MOU facilitation, if applicable.
A4.5 – Response 04	Defence Airspace & Air Traffic Management (DAATM)	12/12/23	Acknowledgement and Decision Pending
A4.6 - Response 04A	DAATM	04/01/24	Email containing formal response
A4.7 – Response 04B	DAATM	04/01/24	Formal Letter Response.
A4.8 – Response 04C	Change Sponsor (Consultant)	08/01/24	Response to DAATM's Formal Letter
A4.9 – Response 04D	DAATM	12/01/24	Email Response.
A4.10 – Response 05	His Majesty's Prison / Young Offenders Institute Portland	12/12/23	Email Response.
A4.11 – Response 06	Wyke Regis Training Area	14/12/23	Email Response.
A4.12 – Response 07	Wessex Hang Gliding & Paragliding Club (WHGPG)	11/01/24	Email containing formal response
A4.13 – Response 07A	WHGPG	11/01/24	Formal Letter Response.
A4.14 – Response 07B	Change Sponsor (Consultant)	12/01/24	Formal Response to WHGPG Letter

Table 4 - Summary of Stakeholder Responses - Evidence

## A4.1 Response 01: Exeter Airport

Date: 19/11/2023

[EXTERNAL] ACP-2022-050\_PortlandATZ/FRZ Engagement - Stakeholder Response

[REDACTED]



Sun 19/11/2023 13:02

 You replied to this message on 20/11/2023 08:56.

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Good afternoon.

I have reviewed ACP-2022-050 which proposes the introduction of a new Air Traffic Zone (ATZ) and a Flight Restriction Zone (FRZ) located at Portland Heliport. This proposal would not adversely affect operations at Exeter therefore our position is one of indifference.

Thank you.

[REDACTED]

Exeter Airport

Sent from [Mail](#) for Windows

## A4.2 Response 02: Westland Airport

Date: 02/01/2024

[EXTERNAL] ACP-2022-050\_PortlandATZ/FRZ Engagement - Stakeholder Response

[REDACTED]



Tue 02/01/2024 14:15

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The proposal has been disseminated around the Flight test Pilots with no concerns on it and general consensus that it would be good to have a frequency to talk to for when flying in the Portland area.

Regards

[REDACTED]

Company General Use



[REDACTED]

Leonardo  
Lysander Road  
Yeovil, Somerset, United Kingdom  
Tel: +44 (0)1935 702628  
Mob: 07541 766509



### A4.3 Response 03: Plymouth Military Radar

Date: 04/12/2023

[EXTERNAL] RE: 20231117-Engagement: Proposed establishment of an ATZ and FRZ at Portland Heliport.



Unclassified

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Good afternoon,

Thank you for sight of this document. I will provide feedback through the Airspace manager and a formal response from Navy will come via DAATM.



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**GLOBAL MODERN READY**

### A4.4 Response 03A: Plymouth Military Radar

Date: 12/01/2024

[EXTERNAL] RE: 20231117-Engagement: Proposed establishment of an ATZ and FRZ at Portland Heliport.



Griggs, James Lt.Cdr (NAVY OP TRG-FOST S SATCO) <James.Griggs465@mod.gov.uk>  
To: Tim Burman-Lilley  
Cc: Paul.Watson373@mod.gov.uk

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Reply Reply All Forward

Fri 12/01/2024 12:08

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Happy to support in drafting an LOA/MOU with you and your team to provide evidence for the ACP application.



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**GLOBAL MODERN READY**

## A4.5 Response 04: Defence Airspace & Air Traffic Management (DAATM)

Date: 12/12/2023

[EXTERNAL] RE: 20231117-Engagement: Proposed establishment of an ATZ and FRZ at Port

[Redacted]

☺ Reply Reply All Forward [Share] ...

Tue 12/12/2023 11:25

🔒 Unclassified

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Thanks, [Redacted]

The DAATM Airspace team will respond in due course.

Regards,

[Redacted]

Defence Airspace and Air Traffic Management (DAATM)  
Aviation House  
Gatwick Airport South  
West Sussex  
RH6 0YR

[Redacted]

## A4.6 Response 04A: DAATM

Date: 04/01/2023

[EXTERNAL] RE: 20231117-Engagement: Proposed establishment of an ATZ and FRZ at Portland Heliport.

[Redacted]

☺ Reply Reply All Forward [Share] ...

Thu 04/01/2024 11:57

🔒 Unclassified

🕒 Follow up. Start by 04 January 2024. Due by 04 January 2024.  
You replied to this message on 05/01/2024 14:55.

📎 20231121-ACP-2022-050-MOD\_Response.docx  
66 KB

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Good Afternoon [Redacted]

Please see attached for the MOD response regarding the proposal for an ATZ and FRZ at Portland Heliport.

[Redacted] is the controlling authority for the Portland DAs and is therefore the most appropriate POC from the MOD to discuss the overlap of the DA and proposed ATZ. Please feel free to contact him directly but may I request that you please keep myself at DAATM copied in and involved from a wider MOD point of view.

Happy to discuss any of the content in the attached, but hopefully they are simple points to clarify or come to an agreement over.

Regards

[Redacted]

[Redacted] Defence Airspace and Air Traffic Management |  
Aviation House | 1E Beehive Ringroad | Crawley, West Sussex, RH6 0YR | Skype: [Redacted] E-Mail: [Redacted]

[Redacted]

## A4.7 Response 04B: Formal DAATM Response Letter.

Date: 04/01/2024

OFFICIAL



Defence Airspace and Air Traffic  
Management (DAATM)

Email: [REDACTED]@mod.gov.uk

03 January 2024

Dear Osprey,

### FORMAL MOD RESPONSE TO ACP-2022-050

Please accept this letter as the formal MOD response to this ACP. DAATM have collated feedback from across the MOD and would like to highlight several points.

1. The main concern the MOD have is the overlap between the proposed ATZ and EGD014. The MOD would like to understand what impact on the DA the ATZ will have, or if activation of the DA takes primacy. Any impact or restrictions on MOD activity within EGD014 would be unacceptable. If there is no impact on DA activation, then the MOD has no issue with this proposal. A point of contact for the controlling authority of EGD014 (SATCO FOST) has been provided in the covering email to this feedback so that the matter can be discussed further.
2. In the stakeholder engagement document it refers to 'a controlled airspace environment'. Usually, an ATZ is not controlled airspace but retains the background classification of the airspace it is situated within. This statement could cause confusion and the MOD would like to confirm that this proposal will not alter the background classification of the current Class G airspace in that area?
3. The MOD would like to confirm what level of ATS will be provided. The engagement document mentions air traffic control, but then refers to an AFIS and AGROM. The MOD's assumption is that there will not be air traffic controllers providing an ATS, but a lower level of communication service such as a FISO.

In summary, providing there is no impact on operations within EGD014, the MOD support this proposal to create an ATZ.

Please do not hesitate to contact the undersigned if further information is required.

Yours sincerely,

[REDACTED]  
[REDACTED] Airspace Operations

OFFICIAL

Page 1 of 1

## A4.8 Response 04C: Formal Response to DAATM

Date: 08/01/2024

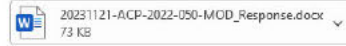
RE: 20231117-Engagement: Proposed establishment of an ATZ and FRZ at Portland Heliport



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Dear [REDACTED]

### References:

- [UK Civil AIP \(AIP/AC 13/23\): Service: EG D014 PORTLAND - DACS: Plymouth Military on 124.150 MHz when open; at other times, Swanwick MIL via London information on 124.750 MHz; DAAIS: London information on 124.750 MHz.](#)
- [The Rules of the Air 2015](#)
- [Regulation \(EU\) No. 933/2012](#)
- [SARG Policy 115: Establishment and Dimension of Aerodrome Traffic Zones \(ATZ\)](#)

### Response to Stakeholder (DAATM) Formal Response Letter (Ref: Portland Heliport CAP 1616 ACP-2022-050 Engagement)

Thank you for your formal and considered response (PSA) to the Airspace Change Proposal (ACP-2022-050) concerning the proposed establishment of an ATZ and FRZ at Portland Heliport. Having reviewed your response, I would like to direct you to the items below which hopefully will address the points you raised in your formal correspondence (PSA). We sincerely hope these satisfy any concerns you may have and therefore gain your full support for this ACP.

**Item 1:** To provide a little more context to our approach to the Portland Heliport's proposed ATZ/FRZ dimensions:

**Consideration of an ATZ with a standard 2nm Lateral Limit** - The initial approach considered implementing a **standard** 2nm ATZ at Portland Heliport. Any volume of the ATZ lateral limits which overlapped into EG D014 would be ceded in primacy to the effected danger area (DA) controlling authority (CA) during its operational hours. However, further investigation showed a continual requirement for communication service primacy (DACS), even in the event of DA being closed/inactive<sup>11</sup>. This approach would require a formal agreement between Portland Heliport and the DA CA, such as a Letter of Agreement (LOA).

**Consideration of an ATZ with a non-standard 2nm Lateral Limit** - Our preferred approach is the establishment of a **non-standard** 2nm ATZ/FRZ at Portland Heliport. However, when the ATZ lateral limits intersect the border of EG D014, the ATZ airspace would deviate (non-standard lateral limits) and run parallel along the outer border of the DA to rejoin the standard ATZ circumference perimeter and close the ATZ volume of airspace (Figure 1 below).



Figure 1 - Portland Heliport non-standard ATZ/FRZ lateral limits, without EG D014 (Portland) infringement.

At no point will the non-standard ATZ infringe inside ED D014 Portland. In real terms this approach only relinquishes a very small volume of ATZ airspace compared to a standard 2nm ATZ. The overlapping area of airspace between the proposal Portland Heliport ATZ and EG D014 constitutes a 0.94 nautical mile perimeter and an area of 0.06 square kilometres (Figure 2 below). This approach still allows Portland Heliport to achieve safe operations, without adding further periodical CA transference mechanisms, as this may add further confusion to air users operating in the vicinity of the Heliport.



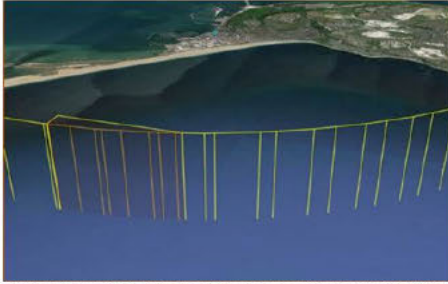


Figure 2 - Proposed ATZ overlapping volume of airspace (Orange) into ES D034 (Portland)

**Item 2: Airspace Classification** - As you correctly commented in your response letter (Point 2), an ATZ will typically inherit the airspace classification in which it resides. Acknowledging that the definitive rule behind an ATZ resides within The Rules of the Air 2015<sup>[2]</sup> (section 3, para 11), supported by the SERA document<sup>[1]</sup> which defines an ATZ, but not its purpose. However, it does support the mechanism that an ATZ takes on the classification of its surrounding airspace. Additional guidance and direction can be taken from the SARG ATZ policy document<sup>[4]</sup>. To clarify the intent of the ACP and any misrepresentation within the Engagement Material, I can confirm that Portland Heliport is located within Class G airspace and so, any established ATZ at Portland Heliport will also retain the same classification.

**Item 3: Air Traffic Services** - At present Portland Heliport, and in conjunction with the completion of independent works to gain CAA Heliport Licensed status, is currently operating a A/G communications service. It is understood that this level of heliport communications will continue with the successful establishment of this ACP's ATZ/FRZ. The Heliport's aspiration is to develop and upgrade their Heliport communications system to a FISO (no date given). I can also confirm that there are no air traffic controllers providing any ATS at Portland Heliport.

#### Summary & Next Steps

In summary, I would like to thank you again for your engagement with this ACP, and I hope this email satisfies your queries regarding the ACP and the associated engagement materials. Please feel free to contact me at your earliest convenience to discuss our suggested approach. Please note that the engagement period for this ACP ends on the 12<sup>th</sup> January 2024, and this correspondence along with all other stakeholder engagement correspondence will be submitted to CAA on 19<sup>th</sup> January 2024 for their final ACP evaluation. The CAA DECISION Stage is expected to take no longer than ten weeks. It is our intent to notify all identified stakeholders of the CAA ACP DECISION as soon as is possible.

Thank you in advance.

[Redacted]

[Redacted]  
Osprey Consulting Services Ltd

[Redacted]

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Group [www.tpgroupglobal.com](http://www.tpgroupglobal.com)

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## A4.9 Response 04D: Response from DAATM consent to Non-standard ATZ Option.

Date: 12/01/2024

[EXTERNAL] RE: 20231117-Engagement: Proposed establishment of an ATZ and FRZ at Portland Heliport.

[Redacted]

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Fri 12/01/2024 09:40

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Good Morning [Redacted]

Thank you for the reply. The MOD can confirm that this extra information has helped to clarify the wording used in Items 2 and 3.

Regarding Item 1, the MOD would concur that a non-standard ATZ would be the preferred option and in either case are content that there will be no impact to activation of, and activities within, D014. Any requests for an LoA or DACS provision outside of published D014 activation times, should be directed to FOST in the first instance. However, DACS will not be provided by the MOD if D014 is not active.

Please do not hesitate to contact myself or Lt Cdr Griggs if you require further information.

Regards

[Redacted]

[Redacted] Defence Airspace and Air Traffic Management |  
Aviation House | 14 Beehive Ringroad, Crawley, West Sussex RH6 0YR | Skype: [Redacted] | E-Mail: [Redacted]

[Redacted]

## A4.10 Response 05: His Majesty's Prison / YOI Portland

Date: 12/12/2023

[EXTERNAL] FW: 20231117-Engagement: Proposed establishment of an ATZ and FRZ at Portland He...

[Redacted]

☺ Reply Reply All Forward 📧 ...  
Tue 12/12/2023 12:29

🔒 Unclassified

📧 We found suspicious links  
Outlook item

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Hello [Redacted]

Could you update your records to reflect me as The Governor of HMP/YOI Portland please? In response to the request, I would welcome the restrictions as it can only improve the security at my prison.

Kind Regards

[Redacted]

**HMP Portland**  
104 Grove Road,  
Portland,  
Dorset, DT5 1DL

[Redacted]

## A4.11 Response 06: Wyke Regis Training Area

Date: 14/12/2023

[EXTERNAL] RE: 20231117-Engagement: Proposed establishment of an ATZ and FRZ at Por...

[REDACTED]



Thu 14/12/2023 08:42

Unclassified

Follow up. Start by 16 December 2023. Due by 16 December 2023.

UNCLASSIFIED

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Good morning [REDACTED]

Having reviewed the proposal we have no objections to the establishment of airspace or FRZs around the Portland Aerodrome so long as any associated procedural design, or subsequent flight profiles, don't introduce increased risk to aircraft operating to/from or related to the Wyke Regis Training Area.

Regards

[REDACTED]

Defence Infrastructure Organisation  
Wyke Regis Training Area (WRTA)  
WRTA HQ  
Camp Road  
Wyke Regis  
DT4 9HH

Website: [www.gov.uk/dio/](http://www.gov.uk/dio/)  
Twitter: @mod\_dio @HQ\_WRTA

## A4.12 Response 07: Wessex Hang Gliding & Paragliding Club


Date: 11/01/2024

[EXTERNAL] ACP-2022-050\_PortlandATZ/FRZ Engagement - Wessex HGPG Club Response

[REDACTED]



Thu 11/01/2024 11:02

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Dear [REDACTED]

Please find attached the Wessex Hang Gliding and Paragliding Club response to the Portland Heliport CAP 161 ACP-2022-050 Stakeholder Engagement document.

I am sending this as the [REDACTED] club. Up to date contact details for the club committee can be found at <http://www.wessexhgpg.org.uk>

Best wishes

[REDACTED]



## A4.13 Response 07A: Formal WHG&PG Club Response Letter

Date: 11/01/2024

### **Portland Heliport CAP 1616 ACP-2022-050 - Stakeholder Engagement**

#### **Wessex Hang Gliding and Paragliding Club**

The Wessex Hang Gliding and Paragliding Club, established in 1974, is a recreational club affiliated to the British Hang gliding and Paragliding Association. The club has 346 members who fly foot launched gliders from a number of launch sites in and around the Dorset area. The club is not responsible for flying decisions taken by individual members, but provides information to help members fly safely.

Hang gliders and paragliders are light weight unpowered aircraft that fly relatively slowly compared to most other aircraft. Unless specific local agreements have been made flying takes place in uncontrolled airspace, utilising visual flight rules. The pilots do not routinely carry air band radios nor have licences in place to talk to Air Traffic Control.

The carrying of Electronic Conspicuity is not mandated. Where used the most common Electronic Conspicuity devices are FLARM and/or FANET based, originally introduced for sailplane/glider conspicuity purposes and not visible to general aviation. The position of the British Hang gliding and Paragliding Association with respect to Electronic Conspicuity is stated at [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).

There are two main types of hang gliding and paragliding flying activity - soaring and cross country flying. When soaring the gliders fly in the updraft created by the prevailing breeze passing over a cliff or hill. Different flying sites are suitable for different wind directions. When flying cross country the gliders use thermic lift to climb high and then glide to find the next thermal to climb again, generally travelling long distances down wind. The proposed airspace change could impact both of these flying activities.

The proposed ATZ contains two long established hang gliding and paragliding soaring sites. Portland East, site guide <http://www.wessexhgpg.org.uk/Sites/Siteguide/PortlandEast.pdf>, may be flown when the wind is from the East North East to East South East. Portland West, site guide <http://www.wessexhgpg.org.uk/Sites/Siteguide/PortlandWest.pdf>, may be flown when the prevailing breeze is from the West to North West. At Portland West gliders may potentially be forced to land below the cliffs on Chesil Beach if wind conditions become too strong to safely land at take off or too light to stay up. Both site guides advise pilots to inform Coastguard Headquarters and HeliOps that flying will be taking place. These soaring sites have been used for several decades. During this period the heliport was in use as a busy Naval Air Base with multiple flights in and out of the site without any recorded incidents or safety concerns from either side.

Cross country flights typically start inland and often end when pilots flying downwind reach the coast. Under certain conditions pilots starting inland, sometimes over 100km away, have reached the coast at Weymouth with the height to glide across Portland Harbour and land at Portland Bill. An example flight track of a cross country paraglider flight landing at Portland Bill can be seen at <https://www.xcleague.com/xc/flights/20111737.html>. The introduction of the proposed ATZ potentially restricts such flights since the glider pilots will need to ensure they have the height to not only cross the harbour but to also stay above the ATZ cylinder. The option of safely landing on Chesil Beach if the glider encounters sink or headwinds will entail entering the proposal's controlled airspace.

The Wessex Hang Gliding and Paragliding Club would like to ensure that the proposed airspace changes do not prohibit or restrict the established flying activities.

## A4.14 Response 07B: Formal Response to Wessex HG&PG

Date: 12/01/2024

RE: [EXTERNAL] ACP-2022-050\_PortlandATZ/FRZ Engagement - Wessex HGPG Club Response



Fri 12/01/2024 15:53

Unclassified

Dear [REDACTED]

Thank you for your engagement and feedback concerning the proposed establishment of an ATZ/FRZ at Portland Heliport (ACP 2022-050).

I would like the opportunity to attempt to address several of your concerns.

### References:

- <sup>1</sup> [UK Civil AIP \(ENRAC 13/23\): Service: EG 0014 PORTLAND - DACS: Plymouth Military on 124.150 MHz; when open; at other times, Swanwick MIL via London Information on 124.750 MHz; DAAIS: London Information on 124.750 MHz;](#)
- <sup>2</sup> [The Rules of the Air 2015](#)
- <sup>3</sup> [Regulation \(EU\) No. 965/2012](#)
- <sup>4</sup> [SARG Policy 115: Establishment and Dimension of Aerodrome Traffic Zones \(ATZ\)](#)

As stated in the engagement material the proposed Portland Heliport ATZ will be situated in Class G airspace. As per our discussion over the phone (11/01/24 @11:15hrs) I commented that an ATZ typically inherit the airspace classification in which it resides. Acknowledging that the definitive rule behind an ATZ resides within The Rules of the Air 2015<sup>2</sup> (section 3, para 11), supported by the SERA document<sup>3</sup> which defines an ATZ, but not its purpose. However, it does support the mechanism that an ATZ takes on the classification of its surrounding airspace. Additional guidance and direction can be taken from the SARG ATZ policy document<sup>4</sup>.

The intent for the ACP has always been one of safety. The safe separation of aircraft operating at Portland Heliport must take priority for obvious reasonings due to the nature and military contracted support conducted at the site. This is further supported by the associated FRZ reducing drone activity in the area. The addition of the FRZ, I believe is an added benefit to the PG & HG community. In Portland's case, the ATZ retains class G airspace, this does not restrict air users from entering the ATZ. What it does do is place a requirement on the air user to communicate with the aerodrome/Heliport, in Portland's case via A/G, prior to entry. This ensures the A/G Comms Mgr can safely deconflict aerial activity within the ATZ, and detail warnings to other air users on entering the vicinity.

This leads me on to your limitation of PG and HG air systems not having the comms capability or the necessary comms competence to contact Portland once airborne. This issue I'm afraid is something an ACP will find difficult to address; however, I can suggest an MOU & LOA. The Wessex HGPH Club could engage with the Portland Heliport operator to put in place an agreement such as a Memorandum of Understanding (MOU) or a Letter of Agreement (LOA). These documents should principally concern the safety procedures, access timings (during ATZ activation), HGPG activity timings, communications methods, and notification processes, such as NOTAM's, required to allow for the safe continuation of both HG & PG activity and the inbound and outbound rotary activity within the Portland ATZ.

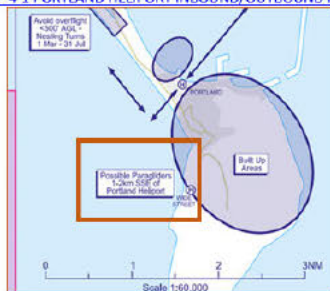
### SUPPORTING EVIDENCE FOR CONTINUED HG & PG ACTIVITY POST IMPLEMENTATION OF PORTLAND ATZ – CLASS G.

1. Historical access (as detailed in your Response Letter below).
2. Pre-existing HG & PG activity already published in the UK Civil AIP – Portland Heliport Documentation.
  - a. [EGDP AD 3.21 FLIGHT PROCEDURES – 1 ARRIVAL & DEPARTING](#)

#### 1 ARRIVING AND DEPARTING

- a. All approaches and departures to the Heliport are conducted at the aircraft commander's discretion. There is a 2M perimeter fence (orange) marked by red hazard lights in line with the FATO. Pilots are to make their approach to H20 & H02 to the middle of the TLOF.
- b. There is a public right of way on the immediate underfoot to H20, therefore if approaching H20 or departing H02 crews, should plan to overfly the right of way as high as is safely possible to minimize any downwash effects.
- c. Following approach to the TLOF aircraft are then to hover taxi over the raised grass bank to the 'H' in the dispersal area, then to a parking spot or refuelling stand.
- d. All ground taxi capable aircraft should land and take off at the 'H', and ground taxi to and from a stand or the Refuel Spot under guidance from the marshaller.
- e. All aircraft are requested to be downwash aware whilst manoeuvring on the Heliport.
- f. A good lookout should be maintained when approaching/departing from [Chesil Bank direction as this area is used by paragliders](#) recreational kites and RPAS.
- g. Aircraft arriving via H20 or departing via H02 should exercise caution as vessels have been observed to cross the approach/departure path.

- b. [EGDP-4-1 PORTLAND HELIPORT INBOUND/OUTBOUND FLIGHT PROCEDURES](#)



I sincerely hope this email has mitigated some of your concerns regarding your support for the establishment of a Portland Heliport ATZ/FRZ. Please feel free to contact me at your earliest convenience.

Kindest of regards,

[REDACTED]  
- Airports & Airspace