UK Civil Aviation Authority

DAP1916 - Statement of Need

Tracking Code:

BEFORE YOU BEGIN
Please ensure the contents of CAP 1616f, Guidance on airspace change process for permanent airspace change proposals are referred to prior to completing this form. *
TYPE OF CHANGE
1. Category of Airspace Change
Does your proposal concern Changes to Notified Airspace Design or Planned and Permanent Redistribution of Air Traffic? * Changes to Notified Airspace Design Planned and Permanent Redistribution of Air Traffic
Have you previously submitted a Statement of Need?
Please enter a title for this intended change, (max 80 characters - the title should be succinct and include a location (where appropriate)): *
NATS Services (NSL) BVLOS Trial in Unsegregated Airspace
2. Title of proposal
Which of the following categories is the proposal being progressed under? * O Permanent Temporary Trial
If known, please provide the ACP/PPR reference number (###-YYYY-NNN)
ACP-2024-001
Please provide your rationale for submitting a revised Statement of Need below: *
Following the initial review by the CAA and their valuable guidance, we acknowledge the need to provide a more clarified Statement of Need.
SPONSOR
3. Change Sponsor Details
Please select the appropriate category and complete. *
A Company An Unincorporated Association or other body
Individual (including sole traders and partnerships)

3a. A Company

Registered Company name (in full) *		
NATS Services Limited		
Registered Company Number		
04129270		
Trading Address (primary site)		
4000 Parkway, Whiteley, Fareham, Hampshire		
Trading name (if applicable)		
NATS Services		
E-mail		
NAUACP@nats.co.uk		
Postcode		
PO15 7FL		
Registered Office Address		
4000 Parkway, Whiteley, Fareham, Hampshire		
Country of Company Registration		
United Kingdom		
Country		
United Kingdom		
Postcode		
PO15 7FL		
Email *	Confirm Email *	
Do you require access to the CAA's Airspace Change Por	tal?	
Telephone *		
Primary Point of Contact Name *		
Website address		
https://www.nats.aero/		

Additional Contacts

You can add up to 4 additional contacts (this is useful to ensure that periods of absence are covered)

Contact 1 Contact Name * Do you require access to the CAA's Airspace Change Portal? Telephone * Email * Confirm Email * **DELETE CONTACT** Add Contact STATEMENT OF NEED

Independent Aviation/Airspace Consultancy

Is an Independent Aviation/Airspace Consultancy involved in this proposal?

Statement of Need

Please complete the following four sections.

What is the objective of the proposed change? *

The proposed Airspace Trial, led by NATS Services Ltd (NSL) will demonstrate the end-to-end scalable solution and innovative technology to enable the safe accommodation / integration of uncrewed and crewed operations. Our aim is to develop a safe and scalable solution, in the North Sea that enables strategic deconfliction, flight authorization, managed access to the trial airspace and utilising enhanced situational awareness. Through the provision of a cooperative layered system underpinned by ANSP support, NSL will provide data and evidence to progress the CAA's policy on safe integrated operations and in doing so support wider replication elsewhere.

NSL have partnered with an OSC approved BVLOS operator and begun engagement with key stakeholders to demonstrate a safe and effective solution to integrate crewed and uncrewed aircraft into a trial airspace located at the North Sea. Whilst providing the benefits of an environmentally friendly service in respect of significantly reduced carbon emissions, the concept will directly support the development of operations that are eventually agnostic to the land or maritime environment.

Via the CAP2616 sandbox process and CAP1616 airspace change process, this trial would expect to establish TRA and ruleset to acquire data on accommodation of both crewed and uncrewed aircraft, potentially with multiple simultaneous uncrewed operations.

Please provide a summary of the issue or opportunity this proposal is seeking to address including any safety, operational, technical, environmental or economic factors. *

The development of the UK BVLOS ecosystem from an individual flight posture to industrialisation is dependent on a safe and effective regulatory infrastructure. Scaling the BVLOS industry from concept to realisation requires the safe integration of crewed and uncrewed air vehicles in an unsegregated airspace environment, aligning with the CAA's 2040 Airspace Modernisation Strategy (AMS). NSL believe this proposed airspace trial will strongly support and accelerate those aims.

In addition to many North Sea use cases, the oil and gas industry relies on conventional helicopters for surveying climate impacts to meet the UK's Net Zero goals by 2050. However, this method is costly in terms of both emissions and finances. Uncrewed operations provide an efficient environmental and fiscal cost reducing mechanism while enhancing responsiveness, flexibility, and availability. This shift to uncrewed aligns with the UK's broader strategy to decarbonize the economy and supports the industry's commitment to achieve the 2030 target of reducing man-made methane emissions by 30%. Uncrewed air systems provide a solution that not only reduces costs and emissions but also further mitigates the risk to life associated with conventional, crewed airborne support activities.

NSL is committed to leading and accelerating changes required for a safe, scalable, unsegregated airspace solution, and we look forward to sharing the insight and knowledge gained from our trials with the CAA. In doing so supporting the UK Government aim for leading the development of Future Flight, the CAA 2040 AMS, and ultimately helping deliver the required strategic outcome of safe integration of new airspace users.

Please provide a description of the current airspace design (i.e. the airspace structure and flight procedures) relevant to this proposal. *

The proposed trial airspace falls within Class G, over water, and inside this airspace, helicopter operations are primarily conducted to support the oil and gas industry. This area is supported via ATS / FIS services by Aberdeen ANSP under licence (an NSL unit). Historically and planned BVLOS operations have been (are planned to be) conducted in this region via use of TDAs. This trial would expect to use TRA.

Please provide a description of the current prevailing air traffic situation (i.e. frequency and number of movements) and an indication of estimated forecast growth (where applicable). *

Given the North Sea location there is relatively little GA traffic at present. The predominant operation in this area is essential commercial traffic for the North Sea Oil and Gas industry, primarily facilitated through helicopter support and typically operating around 2000-3000 feet, around 145 operations occurring per weekday. Given the licenced North Sea operation – the traffic environment is well understood. It should be noted that the current crewed movements are situated above the typical height of intended BVLOS operations. As part of our planned activity, we will be able to provide a much more data driven specification of typical traffic. This trial would use the typical North Sea operation as part of the trial, to gather data on how accommodation via TRA may lead to a future permanent integration method.

Five	e-Letter Name Codes (5LNC)		
	Does this request solely concern the reservation of new Five-Letter Name Codes (5LNC) in advance of a future proposal?		
Secretary of State for Transport's priorities			
	Is the proposal being progressed under any of the priorities set by the Secretary of State for Transport or any other CAA priority such as safety or national security?		
Airspace Modernisation Strategy *			
✓	Is the proposal supporting the delivery of the Airspace Modernisation Strategy? If not, please use the text box below to explain how the proposal is not inconsistent with the Airspace Modernisation Strategy		

Additional Information

Please use the box below to add any further information which the CAA should be aware of when considering this submission (for example dependencies on other airspace change proposals, proposed operating date(s) and/or funding deadlines)

NSL are actively involved in supporting numerous future flight initiatives and commercial projects as well as delivering uncrewed air vehicle management and approvals at airport units where we provide ATS. We see this proposed airspace trial activity as the most significant step for us in supporting the AMS and BVLOS policy evolution and being the culmination of years of our research & learning. For this airspace trial - we have a mature project with existing investment confirmed, reflecting our high level of focus, and demonstrating our strong commitment to leading new airspace user enablement; we wish to advance in this project as swiftly as possible.

SUBMISSION INSTRUCTIONS

Submission

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

Date and Time:

30 Jan 2024 2:21:54 PM

Application Submission Number:

DAP1916V2-1011

Please note that the Airspace Regulation team will contact you to acknowledge receipt of your Statement of Need and to confirm the unique ACP reference number (ACP-YYYY-NNN) allocated to this submission. Following receipt of your unique ACP reference number, you will be required to create an associated airspace change proposal on the <u>CAA's Airspace Change Portal (https://airspacechange.caa.co.uk/)</u>. Please refer to CAP 2385 Airspace Change Portal Important Information Guide.

Given the high number of new airspace change proposals (ACP), together with those proposals which are already in the system, it is possible that the proposal may not be assigned to a Technical Regulator/Account Manager immediately following submission of the Statement of Need. New proposals are allocated on a first come first served basis, unless the proposal is directly related to safety or national security matters, or as directed by the Secretary of State for Transport's priorities.

Once your submission has been assigned to an Account Manager/Case Officer, arrangements will be made for you to attend an Assessment Meeting. One of the key outputs from this meeting will be an indicative timeline for the proposed PPR. For Permanent changes, to enable the CAA to consider your proposed timescales, you will be expected to present dates for the following milestones at the Assessment Meeting:

- DEFINE Gateway
- DEVELOP & ASSESS Gateway
- CONSULT Gateway
- Formal Airspace Change Proposal Submission
- DECIDE Gateway
- Target AIRAC

The CAA holds Gateway Assessment Meetings on a monthly basis and the annual schedule is published on the CAA's airspace change portal (https://airspacechange.caa.co.uk/about-airspace-change/).

Finally, you should also note that from September 2018 any amendments submitted by a Data Originator or ANSP for onward promulgation in the UK IAIP will be subject to the Aeronautical Data Quality Requirements. See Regulation (EU) No. 73/2010 as retained (and amended in UK domestic law) under the European Union (Withdrawal) Act 2018 and CAP 1054: Aeronautical Information Management (https://publicapps.caa.co.uk/modalapplication.aspx?

appid=11&mode=detail&id=6808) guidance material for further information. These requirements will be discussed in greater details during the course of your initial meeting with the CAA.

When you have completed this form, click this button to submit the form for processing. Do not click this button more than once. You will then be provided with further instructions.