

CAA Targeted Engagement Assessment – Temporary Airspace Changes

Title of airspace change proposal	TDA For Unmanned Aircraft Operations in South North Sea
Change sponsor	Flylogix Holdings Ltd
Project reference	ACP-2023-066
Case study commencement date	01/12/23
Case study report as at	15 /12/23
<p><i>Instructions</i></p> <p>In providing a response for each question, please ensure that the 'status' column is completed using the following options:</p> <p>• YES • NO • PARTIALLY • N/A</p> <p>To aid the SARG Lead it may be useful that each question is also highlighted accordingly to illustrate what is:</p> <p>resolved YES not resolved PARTIALLY not compliant NO</p>	

Targeted Engagement Assessment		
1	Has the change sponsor identified the right audience(s) and provided a rationale for selecting them?	YES
	<p><i>Yes, the sponsor has identified the right audience and provided rationale for selection.</i></p> <p><i>Sponsor completed BVLOS UAS flights, within a TDA, in the Southern North Sea in 2021, 2022 and in other areas of the North Sea. As a result, there has been previous engagement with relevant stakeholders prior to this ACP process and a list of stakeholders was developed during these previous ACPs. This was used as a starting point for identifying the Stakeholders to be engaged with. In line with CAP1616 the sponsor engaged with aviation stakeholders to get feedback on the safety and operational impact of the proposed TDA.</i></p> <p><i>Stakeholder groups included: -</i></p> <ul style="list-style-type: none"> • ANSP - NATS (Anglia Radar) • Oil and Gas helicopter operators – CHC, NHV, Bristow, Babcock • SAR – JRCC, Bristow SAR • Commercial operators working in area – Airtask, 2Excel Aviation, Babcock Mission Critical Services Onshore, Unify 	

	<ul style="list-style-type: none"> • <i>General Aviation – Airspace4All, General Aviation Alliance, AOPA</i> • <i>MOD – DAATM</i> • <i>Aerodromes – Norwich Airport, Humberside Airport, Garton airfield</i> • <i>NATMAC Members - Complete NATMAC list except the MAA and Navy Command HQ as DAATM will co-ordinate the MoD response.</i> 	
2	Has the change sponsor explained the engagement methodology / approach used?	YES
	<p><i>Yes, the change sponsor shared their approach as outlined in the Stakeholder engagement strategy document. The sponsor undertook only 1 round of engagement. All stakeholders were sent an email with an attachment on 23 October 2023. The stakeholders who had not replied by the deadline were sent a reminder email to advise them that their comments were still welcome.</i></p>	
3	What materials have been used by the change sponsor during the targeted engagement?	YES
	<p><i>Sponsor sent an email inviting stakeholders to engage together with an attachment with all the necessary information for the ACP. A reminder email was later sent after engagement period was closed.</i></p> <p><i>The material clearly articulated what is being proposed and highlighted the sponsors wishes to minimize the impact of the TDA to other air users. The proposed design was for 2 TDAs, to allow operations to be conducted in the Cygnus and Ravenssprun fields with only one TDA to be activated at a time.</i></p> <p><i>To limit the impact of the TDA complex on other air users, sponsor applied the below design principals:</i></p> <ul style="list-style-type: none"> • <i>Minimise the volume of airspace, including both footprint and altitude (This means multiple smaller TDAs rather than a single large TDA)</i> • <i>Minimise, and if possible, avoid the TDA covering land and the coast. To facilitate this the UA is operated from the coast and flown Visual Line of Sight for take-off and landing – entering the TDA before going BVLOS over the water.</i> • <i>Avoid areas where other aircraft operate below 1,500ft – for example airfields and HTZs.</i> • <i>Segment each TDA to simplify any Danger Area Crossing Service.</i> • <i>Only activate the TDA for the period of the flight.</i> 	

4	<p>Does the Engagement Summary Report clearly detail the period of engagement? Please include the start/end date and duration of engagement period along with a summary of the change sponsors rationale for pursuing a shorter/longer engagement (where applicable).</p>	YES
	<p><i>Yes, the Engagement Summary report clearly details the period of engagement. The engagement window run from 23 October 2023 to 24 November 2023, which is a period of 4 weeks & 4 days. Nonetheless, the standard stakeholder engagement period is 6 weeks and sponsor has provided a rationale as to why they decided on a shorter period in the summary engagement report.</i></p> <p><i>According to the sponsor, the TDA is situated predominantly over the water, with a DACS to support access to the airspace when the RPAS system is not utilising the TDA segments and there's a limited number of flights (max 15) which will limit the number of the activations required. Given the nature of the operations it is felt that the TDA design and operations are limited in that nature of the stakeholders affected and the complexity of the ACP is minimal enabling a scaled engagement window.</i></p>	
5	<p>Was the period of engagement appropriate?</p>	YES
	<p><i>Yes, based on sponsors rational for a scaled period this is acceptable.</i></p>	
6	<p>Has the change sponsor accurately summarised what stakeholders have said and identified all the issues raised during the engagement in the stakeholder engagement summary document? Does the stakeholder engagement summary document detail the change sponsor's response to the identified issues?</p>	YES
	<p><i>The sponsor has summarised what stakeholders said and identified all the issues raised and responded appropriately.</i></p> <p><i>Raw evidence provided includes: -</i></p> <ul style="list-style-type: none"> <i>1 engagement email for feedback to all stakeholders sent 23/10/23.</i> <i>1 reminder email to those who didn't reply sent 22/11/23.</i> <i>12 emails from 6 stakeholders who replied with feedback or objections.</i> <i>11 email responses to the emails from sponsor</i> <i>11 emails from 11 stakeholders who replied but had no feedback or objections.</i> 	

The 3 main key issues include: -

- 1. UNI-FLY operating within a similar area - They commented that segments A and B would be of concern as they fall adjacent to low level routings that they use to operate around Humber Coastal Wind Farm. They requested that Flylogix operate from a location further north.*
- 2. CHC provided comment that they would need to cross the TDA between 1500' and 3000' and highlighted that they fly to Cygnus from Norwich. They asked whether Anglia Radar was able to deconflict from the Flylogix operations as they have previously been unable to gain a clearance from NATS. They stated that they believed that this was due to NATS being unable to verify the transponder code.*
- 3. Bristow Search and Rescue had no objections to the proposal but sought clarification as to the process should they require access in the event of a SAR mission. An email response was sent to confirm that Anglia Radar will be providing the DACS for the area of operations. Anglia Radar will provide a contact number to JRCC-AR so that arrangements can be made for the required crossing/entry into the TDA.*



The proposal didn't change following on from the above feedback however Flylogix agreed to the following: -

- To continue to liaise with UNI-FLY and CHC and Anglia Radar regarding the promulgation of planning flying activity to deconflict where possible and/or necessary.*
- To contact Anglia Radar by telephone or email to confirm they can provide a Danger Area Crossing Service before issuing a NOTAM to activate the TDA.*
- To ensure that the appropriate contact details are in place between Bristow, Flylogix and Anglia Radar prior to operations commencing and ensure that all stakeholders identified are furnished with the information.*

Other issues raised include;

- UKFSC suggested a single TDA with additional spurs. They also commented that they thought that the volume of airspace, especially with regards to 4nm width to be greater than necessary for the platform. Comments raised were discussed with Flylogix and Anglia Radar. It was reiterated that the TDA design was based on the Flylogix TDA design policy and had been based on previous iteration of the TDA design of the same location and dimensions which had worked well in terms of activation, promulgation, and flexibility in terms of activating only what is necessary.*
- 2Excel sought clarification for notification for changes to planned activity or leaving the area should there be a conflicting SAR event. Flylogix confirmed that in the event of SAR activity in the area liaison between Anglia Radar and Flylogix will take place and Flylogix will vacate the required area as a matter of priority. The contact details will be published on AIC and the details will be promulgated on the NOTAM.*

	<ul style="list-style-type: none"> <i>Rob Wendes, a GA pilot based in Surrey filed an objection to the proposed TDA. His comments were taken into account, responded to efficiently and included in the stakeholder feedback. He was offered a telephone conversation of which they accepted to discuss their concerns. Email confirmation of the conversation was sent to the stakeholder for their approval, following confirmation from Anglia Radar that they would provide a DACS.</i> 	
7	Is the change sponsor's response to the issues raised appropriate/adequate?	YES
	<i>Yes, the change sponsors responses are adequate. See Q6.</i>	
8	Has the change sponsor set out how they will collate, monitor, and report to the CAA on the level and content of the complaints?	PARTIALLY
	<i>The sponsor has only confirmed that they will gather all feedback received when the TDA is in place. They have highlighted that once the operation is complete and the TDA ended, any feedback collected during the period will be compiled into a summary report and forwarded to the CAA for review. This has been confirmed as a condition on question 11.</i>	
9	Is the proposal likely to affect traffic operating below 7000ft over an inhabited area? If yes, has the change sponsor provided the brief impact analysis to explain the likely impacts and explained how they will inform relevant community stakeholders?	NO
	<i>Sponsor stated that there will be little to no impact on the flight path or volume of air traffic flying below 7000ft over inhabited areas. The proposed TDA is over the sea and has a proposed altitude of surface to 1,300ft ASL This means that the impact will mainly be on those air users who operate over the sea and residential areas will not be impacted.</i>	
10	Taking the above considerations into account, does the SME recommend that this proposal has met the engagement requirements of the Temporary Airspace Change process?	YES
	<p><i>Yes.</i></p> <p><i>The sponsor identified the right audiences and provided a rationale for selecting them. He has also explained the approach used for engagement using emails as the main form of engagement.</i></p> <p><i>Although sponsor only engaged for 4weeks and 4 days, he has given a good rationale for pursuing a shorter engagement window.</i></p>	

	<p><i>For audit trail purposes sponsor has provided all raw evidence in terms of email correspondence which show that he has taken on board stakeholder feedback.</i></p> <p><i>Finally sponsor has agreed to complete the actions below: -</i></p> <ul style="list-style-type: none"> • <i>Flylogix will inform UNI-FLY and CHC in advance of operations to share the programme of work.</i> • <i>Flylogix will liaise with Anglia Radar for confirmation of contact details prior to operations and ensure that all stakeholders identified above who require the same are furnished with the information.</i> • <i>Flylogix will contact Anglia Radar by telephone or email to confirm they can provide a Danger Area Crossing Service before issuing a NOTAM to activate the TDA.</i> 		
11	<p>Are there any Condition(s) which the change sponsor must fulfil before activation (if approved)? If yes, please list them.</p>	<p>YES</p>	
	<ul style="list-style-type: none"> • <i>The change sponsor should inform the stakeholders of the decision (when published), likely impacts and what will happen next.</i> • <i>The sponsor is required to collate, monitor, and report to the CAA on the level and contents of feedback received during the period of the TDA. The CAA expect reporting on the level and contents of any stakeholder feedback received on a fortnightly basis throughout the duration of the TDA (this should include nil returns). The sponsor should send these reports to the assigned Account Manager.</i> 		
<p>Targeted Engagement Assessment sign-off</p>			
	<p>Name</p>	<p>Signature</p>	<p>Date</p>
<p>Assessment completed by Airspace Regulator (Engagement and Consultation)</p>			<p>15/12/23</p>