

CAA Targeted Engagement Assessment – Temporary Airspace Changes

Title of airspace change proposal	Temporary Danger Area (TDA) for BVLOS operations in the Northern North Sea
Change sponsor	Flylogix
Project reference	ACP-2023-083
Case study commencement date	05.04.24
Case study report as at	19.04.24
<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> <ul style="list-style-type: none"> • YES • NO • PARTIALLY • N/A <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?	Partially
	<p>The sponsor advised that prior engagement on BVLOS UA flights over the North Sea, dating back to 2019 which has included engagement regarding operations in the Northern North Sea (Shetland), informed the compilation of a provisional list of stakeholders for this ACP. Additional stakeholders were identified through; inspecting aeronautical charts to identify local airfields, engaging with local ANSP’s and consideration of the latest NATMAC list.</p> <p>The sponsor engaged with airspace users, Air Navigation Service Providers (ANSP’s) and airports to gain feedback on the safety and operational viability of the proposal, in accordance with CAP 1616 v4 para 301 requirements. The sponsor engaged with 39 stakeholders:</p> <ul style="list-style-type: none"> • Aviation Users/NATMAC list organisations: Babcock, JRCC, Bristow SAR, NHV, CHC, Bristow, Airtask, Babcock Mission Critical Onshore, 2Excel aviation, GAA, AOPA, Airport Operators Association (AOA), Airfield Operators Group (AOG), Aircraft Owners and Pilots Association (AOPA), ARPAS-UK, Aviation Environment Federation (AEF), BAe Systems, British Balloon and Airship Club, British Business and General Aviation Association (BBGA), British Gliding Association (BGA), British Helicopter Association (BHA), British 	

Microlight Aircraft Association (BMAA), British Skydiving, Drone Major, Guild of Air Traffic Control Officers (GATCO), Honourable Company of Air Pilots (HCAP), Helicopter Club of Great Britain (HCGB), Light Aircraft Association (LAA), Defence Airspace and Air Traffic Management, UK Airprox Board (UKAB), UK Flight Safety Committee (UKFSC), United States Air Force Europe (3rd Air Force- Directorate of Flying (USAFE (3rd AF-DOF))

- **ANSPs: NATS (NERL)** – NATS (Aberdeen Radar) and Avinor
- **Airports:** Sumburgh Airport, Tingwall Airport
- **Additional stakeholders:** Viper (Offshore Helicopter Services), Osprey (PDG Aviation Services), Direct Flights (operate out of Tingwall) (identified through discussion with Sumburgh Airport) – these stakeholders were contacted later in the engagement period, some via Sumburgh.

Where the sponsor decided not to engage with certain NATMAC members (namely Airlines UK, ACOG, BALPA, British Airways, Isle of Man CAA, Low Fare Airlines, Military Aviation Authority, Navy Command HQ and PPL/IR Europe), they provided their rationale for this within Section 4.1 of the Stakeholder Engagement Summary document. Their rationale is considered appropriate and none of these stakeholders provided feedback for the sponsor's previous ACP in the Northern North Sea, ACP-2022-044.

Although not a requirement of the process the sponsor considered whether they should engage with local residents at this stage. They decided not to and have provided justification for this approach within Section 4.1 of the Summary of Stakeholder Engagement.

Avinor (a Norwegian ANSP) were not listed as part of the stakeholder list in Section 3 of the Stakeholder Engagement Summary document however engagement with them is discussed later in the document.

This requirement has only partially been met because although the sponsor advised that previous engagement in the area informed a provisional stakeholder list for this ACP, there were operators who they engaged for a very similar ACP (2022-044) who were not included within the original engagement for this ACP, despite them operating in the area and providing feedback to the previous ACP. The sponsor has not been clear why they chose not to engage with these stakeholders until in some cases, they were prompted either by another stakeholder or the CAA. Examples include Isavia ANS (ANSP for the Reykjavik ANSP), Gama Aviation and PDG Helicopters. Although Gama Aviation and PDG Helicopters raised issues regarding the sponsor's previous proposal in a very similar location last year, PDG Helicopters did advise that they would need a facility for emergency access to the TDA for lighthouse support operations if required. Although Gama Aviation had no specific feedback to ACP-2022-044 stating that it is rare they find themselves that far north therefore they expect very little impact if any to their operations, they do provide air ambulance services therefore it is unclear why the sponsor didn't include them from the beginning of engagement for this ACP. A condition to address this been added to Q11. [Update 16/04: Upon a request from the CAA, the sponsor has advised they have now contacted PDG Helicopters \(again\) and Gama Aviation to ask for feedback, but no evidence of](#)

	responses have been provided yet.	
2	Has the change sponsor explained the engagement methodology / approach used?	Partially
	<p>The sponsor has outlined their approach to some extent within the Stakeholder Engagement Summary document, but this could be made clearer. The sponsor did not choose to share an engagement strategy with the CAA in advance of conducting their engagement.</p> <p>The sponsor undertook one round of formal engagement by email and in a couple of cases had telephone calls with stakeholders. The sponsor has omitted to include any evidence/minutes of one of their telephone conversations and therefore it is recommended this should be resolved. This is detailed as a discrepancy under Q11.</p> <p>Prior to the formal engagement window beginning on 25 January 2024, the sponsor contacted a group of stakeholders on 16 January 2024 via email to give them some high-level details of the proposed TDA design and ask for their feedback (email evidence in Appendix 1). It was explained that the Assessment meeting with the CAA had not yet taken place, but comments were being welcomed and stakeholders would be updated after the assessment meeting.</p> <p>On 25 January 2024, stakeholders were contacted again with some stakeholder engagement material and given until the 23 February 2024 to respond (email evidence in Appendix 2).</p> <p>However, it has not been possible to verify (from the Engagement Summary Report and through back-and-forth emails with the sponsor) which stakeholders were contacted on 16 January as part of the early engagement. This is because it is not clear from the screenshot of the email provided in Appendix 1. In addition, the rationale behind contacting certain stakeholders on 16 January in advance of the formal engagement period starting on 25 January has not been explained in the Engagement Summary Document. The sponsor has explained via email to the CAA that “the early engagement was carried on risk and sent to those with whom it was likely the TDA would affect and that a list of those stakeholders have been included in the submission.” However, the only list of stakeholders within the latest version of the Engagement Summary Report (v2) is the full list of stakeholders detailed in Section 3 (a total of 37 stakeholders are listed here) which doesn’t match the number of stakeholders contacted on 16 January. Similarly, it hasn’t been possible to verify all the stakeholders that were contacted via email on 25 January with a copy of the engagement material, since this hasn’t been explained within the Engagement Summary Report and it is not clear from the screenshots of emails in Appendix 2 (where the number of stakeholders contacted on 25 January don’t match the number of stakeholders listed in Section 3).</p> <p>The email evidence shows that the sponsor was somewhat proactive in prompting stakeholders for responses, with a reminder email being sent 8 days into the formal engagement period (2 Feb 2024). It is not clear within the Engagement Summary Report who exactly this email</p>	

	<p>was sent to, but the sponsor has advised it was sent to those who had not already responded and that this will be clarified in an updated submission. Also, Section 5.3 of the Stakeholder Engagement Summary document says that a reminder was sent to those who had not yet replied on the close of the engagement window with an opportunity for them to comment outside of the engagement window should they so wish. However, no email evidence of this reminder has been provided. In an email to the CAA, the sponsor has confirmed that no further correspondence was received as a result of this reminder, and they will update the submission accordingly (currently awaiting receipt of this).</p> <p>Where stakeholders identified other local stakeholders or ANSPs, they were contacted at a later date by either the sponsor or through other stakeholders, however email evidence for some of this engagement hasn't been included.</p> <p>Feedback was proactively sought from stakeholders that were contacted and in addition the sponsor agreed to contact certain stakeholders ahead of operations to notify them of their intended flying window and agree procedures for during operations.</p>	
3	<p>What materials have been used by the change sponsor during the targeted engagement?</p>	N/A
	<p>The sponsor engaged on the safety and operational viability of the proposal in line with CAP 1616 requirements. The engagement material explained the reasons for the proposal, to conduct BVLOS UAS flights within a TDA in the Northern North Sea, to the East and West of Shetland from Scatsta Airport, for a 90-day period between May and July 2024. The material stated that the TDA will be cancelled if all operations are completed early. The purpose of these flights is to conduct menthane surveys of critical offshore energy infrastructure.</p> <p>The material explains that the sponsor plans to carry out 3 separate periods of flights which are indicatively planned for 2 May to 19 May 24, 30 May to 16 Jun 24 and 28 Jun to 14 July 24 (subject to weather and serviceability). These dates are likely to change somewhat due to the delay in ACP timeline so the sponsor should notify stakeholders of the new planned dates as part of the inform condition under Q11. It is also explained that flights will be between 3 and 4.5 hours long, with the TDA being activated 30 minutes before take-off and ending up to 3 hours after the last scheduled landing time.</p> <p>The final submission document up to v4 (inclusive) advises that there are 10 flights planned, however versions 5-8 say there are 15 flights planned mainly to be conducted at weekends when there are fewer oil and gas helicopter movements, although some flights may take place on weekdays subject to traffic. However, the stakeholder engagement material doesn't detail the frequency of flights, it simply lists three periods of flights which cover both weekdays and weekends. The sponsor should clarify the frequency of flights with stakeholders when they inform the full stakeholder group prior to operations after approval has been obtained by the CAA (included under Q11 as a condition).</p> <p>The material also explains the design principles adopted to mitigate the impact of their operations on other airspace users:</p>	

	<ul style="list-style-type: none"> • Minimise the volume of airspace, including both footprint and altitude • Segment the TDA so that only the sections required for a specific flight are activated, and to simplify the Danger Area Crossing Service (DACS) <p>The material goes into further detail as to the considerations made by the sponsor when designing the TDA, such as why they selected Scatsta Airport and how they designed the TDA segments.</p> <p>Two maps of the proposed TDA design were included, one to show the TDA segments East of Shetland and one showing the TDA segments to the West of Shetland. The maps show segments A, B and N to have land coverage, and the remaining segments are shown to be offshore. There are 20 segments in the proposed design in total (now 19), with 7 segments to the West of Shetland and 12 (now 11) to the East, with segment A sitting in the middle covering Scatsta Airport. Although the maps in Figures 2 and 3 themselves appear clear, the Figures could have been more clearly labelled as representing the designs both East and West of Shetland respectively. The title for Figure 3 for example is labelled as a ‘Map of overland TDA Segments A, N-V’ which isn’t accurate since segments all segments except A and N in this map are shown to be offshore in the map and this hasn’t been clearly articulated in the text associated with the map either. These issues appear to be copy/paste issues from another proposal (ACP-2022-044 engagement material). The sponsor should update these accordingly (this is listed as a discrepancy under Q10). The sponsor has advised that they didn’t receive any queries from stakeholders regarding these Figures.</p> <p>The engagement material also addressed proposed activation and NOTAM arrangements, that is, a NOTAM will be published at least 24 hours in advance of planned flights detailing activation times. The material also provided coordinates for each proposed TDA segment. If UA activity is cancelled for whatever reason, the sponsor will request the NOTAM to be cancelled. The sponsor also asks stakeholders to include within their feedback whether they would like to be notified directly in addition to the NOTAM publication.</p> <p>Stakeholders were asked to provide feedback by email and/or telephone with a request made for any recommended changes to the TDA to improve safety or reduce the impact on stakeholders.</p>	
4	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).	Partially
	<p>The period of engagement is detailed in the Stakeholder Engagement Summary document as:</p> <p>Start date: 16 Jan 2024</p> <p>Closing date: 23 Feb 2024</p>	

	<p>Although some stakeholders (not the full stakeholder list) were contacted on the 16 Jan 2024, this was preliminary engagement commenced prior to the assessment meeting with the CAA on 25 Jan 2024 and didn't include a copy of the full engagement material which was sent on 25 Jan 2024.</p> <p>The formal stakeholder engagement window was as follows: Start date: 25 Jan 2024 Closing date: 23 Feb 2024 Duration: (4 weeks and 1 day)</p> <p>The sponsor should have made this clearer within their Stakeholder Engagement Summary document (as they have in their Stakeholder Engagement material sent on 25 Jan 2024). Section 4 of the Stakeholder Engagement Summary should be updated to accurately reflect the summary of engagement and which stakeholders were contacted and when. This is listed as a discrepancy under Q10.</p> <p>The sponsor explained that they chose this scaled period of engagement specifically to target the AIC publication date of the 2 May 2024, to fit in with client oil and gas platform production and operation schedules. The following rationale was provided to the CAA, and to stakeholders, for the approach taken (section 4 of Stakeholder Engagement Summary document):</p> <ul style="list-style-type: none"> • The groups being engaged are mainly operators and organisations based in the region – so input is only required from one or a small group of people. This means it is possible for stakeholders to provide feedback in less time. • Flylogix is proactive in engaging directly with stakeholders via email and by telephone calls. • Due to Flylogix's experience in operating in this area and the limited number of air users around Shetland, we are able to engage directly with the relevant individuals. <p>Additionally, the sponsor explained that they felt that the scaled stakeholder engagement window was proportionate to the complexity, scale and duration of the TDA proposal.</p>
5	<p>Was the period of engagement appropriate?</p> <p style="text-align: right; background-color: #008000; color: white; padding: 5px;">Yes</p>
	<p>Yes, the rationale provided above is sufficient to justify the engagement period.</p> <p>As explained in Q2, the sponsor conducted some early engagement 9 days prior to the formal engagement window to make certain stakeholders aware of the proposal as early as possible.</p> <p>The email evidence submitted demonstrates that they achieved meaningful two-way engagement with those who they chose to engage with. No requests were made for additional time to respond.</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>Yes, where engagement evidence has been provided, it is clear that the sponsor has accurately summarised what stakeholders have said along with their response to the feedback raised. The Stakeholder Engagement Summary shows that 14 stakeholders responded in total.</p> <p><u>Provision of a Special Use Airspace Crossing Service (SUACS)</u></p> <p>NATS (NERL) confirmed that NATS Aberdeen will provide a SUACS for this proposal. They noted that there would be a requirement for engagement with Avinor given the position of TDA F. They also proposed some wording for inclusion in the AIC to explain that within the TDA, a SUACS will be available from Sumburgh Radar or Brent Radar on the appropriate frequency as defined in the relevant section of the UK AIP.</p> <p><u>Sponsors response:</u> The sponsor confirmed they had already contacted Avinor regarding TDA F and that they are in agreement with the TDA as proposed with direct liaison with Flylogix when entering that segment. They also agreed to include the proposed wording in the draft AIC. It has since been agreed that a Special Use Airspace Crossing Service (SUACS) will be provided by Sumburgh Radar, Brent Radar or Aberdeen Radar.</p> <p><u>International engagement</u></p> <p>Avinor were contacted because part of the proposed TDA F crosses into airspace under jurisdiction of Avinor. Initial responses suggested that there needed to be further liaison given the proximity to Tampen HTZ, however their later correspondence confirms this would not be an issue. Avinor advised that there may be other drone activity in May/June which would require tactical deconfliction therefore Avinor requested a phone call from the remote pilot prior to entering TDA F and then a call to say they are vacating. All phone calls should be made to Supervisor Polaris ACC who will then co-ordinate as required. Avinor do not require notice of activation of the other TDAs. Avinor have requested a phone call should the UA leave the confines of the TDAs as has been the operating procedures in previous ACPs.</p> <p><u>Sponsors response:</u> The sponsor will ensure that the appropriate contact details are in place between themselves, Aberdeen Radar and Avinor prior to operations commencing. Operating procedures will be detailed to ensure that the remote pilot makes contact with Avinor via the Supervisor Polaris ACC prior to entering TDA F and upon completion.</p> <p><u>Update 18/04:</u> It has since come to light via communications between the ATM Inspectors and NATS Aberdeen, that NATS Aberdeen have asked the sponsor to amend the coordinates of TDA F so that it doesn't cross the meridian line. As a result of this, the sponsor has decided to remove TDA F altogether. This will require them to rename the TDA segments and update their Engagement Summary Report accordingly (the submission document v7/v8 now show this information). They will also need to add an explanation of this change and associated engagement evidence with NATS Aberdeen to an updated version of the Engagement Summary Report. After approval, the sponsor will need to notify their full stakeholder group of this change before operations. These have been addressed as conditions under</p>		

Q11.

Deconfliction of flight operations with HEMS/SAR Activity and Pre-notification of operations

Bristow SAR who operate SAR helicopters out of Sumburgh (tasked by JRCC) were engaged via a telephone discussion whereby the proposed operations were set out and Bristow SAR had the opportunity to raise issues and make comments. The sponsor advises that with they were content with a crossing service being provided, they would have sufficient opportunity to access the TDA should they require it for emergency operations.

Upon a prompt from the CAA, the sponsor has advised that they have made contact with Gama Aviation who weren't originally engaged – awaiting update.

Sponsors response: Flylogix explained that they would ensure that they afforded SAR every priority and should an emergency arise then they would vacate the necessary TDA segment immediately to enable access. They will also engage with Bristow SAR prior to operations to ensure that they are aware of the planned dates and timings of the operation. A recommendation has been added to Q10 for the sponsor to provide evidence of their conversation.

Deconfliction of flight operations with local commercial operators

Sumburgh Airport confirmed that there were no concerns from their point of view, confirming that it would not directly affect their operation or infringe the area in which they would be providing a service. They provided guidance with regards to local stakeholders; Bristow oil and gas, Bristow SAR, Offshore helicopters (Viper), CHC, NHV, Osprey (PDG Helicopters) and Direct flights who operate out of Tingwall.

Shetland Islands Council who manage Tingwall Airport, had a telephone conversation with the sponsor where they confirmed the TDA doesn't present any concerns and that they had no issues from the previous operations. They asked if the sponsor had contacted Airtask who operate out of Tingwall since they sometimes operate scenic flights which may be impacted by the TDA.

Sponsors response: The sponsor has advised that all of the local operators recommended by Sumburgh have been contacted either by Sumburgh (where they didn't feel they could pass on contact details – namely for Viper and Direct Flights) or by the sponsor where contact details were shared (PDG Helicopters), although no email evidence for engagement with PDG Helicopters has been included. The sponsor advised Tingwall that Airtask had been contacted but they hadn't had a response. Tingwall advised they would forward the sponsor's email onto Airtask and copy them in, but the sponsor has advised they did not receive a response. The sponsor has confirmed to the CAA via email that they haven't received a response from the other operators, but they have contacted PDG Helicopters again.

Interaction with GA activity

The LAA responded to say they had no objections to the proposal but made comment that Scatsta and Shetland are occasionally frequented by touring GA traffic including their members. The BBGA advised the sponsor to contact the BHA and RPAS UK. RPAS UK had no

	<p>objections to the proposal and the BHA responded to confirm that the proposed TDA would not cause an issue to their operator considering the time of year and the levels involved but asked to be kept informed.</p> <p><u>Sponsors response:</u> The sponsor will ensure that LAA are advised of the outcome of the ACP if successful and ask to promulgate to their members. The sponsor responded to the BBGA to advise that stakeholder engagement had already been sent to RPAS UK and the BHA. The sponsor will ensure that the BHA will be made aware of the planned dates and timings of operation should the ACP be successful.</p> <p><u>Other</u> The following stakeholders replied and had no feedback or objections: 2Excel, CHC, DAATM, Babcock onshore (on behalf of Police Scotland ASU and SCAA – Scotland’s Charity Air Ambulance), RPAS UK and the BGA.</p>
7	<p>Is the change sponsor’s response to the issues raised appropriate/adequate?</p> <p style="text-align: right;">Partially</p>
	<p>Yes, for the stakeholders that the sponsor chose to engage and provide evidence for this engagement, they have provided an accurate summary and their responses to the feedback are considered appropriate. The sponsor has provided almost all the email evidence required (upon prompts from the CAA) to support their submission, but not all as described above. It hasn’t been possible to verify whether the summary of feedback from Bristow SAR is accurate.</p>
8	<p>Has the change sponsor set out how they will collate, monitor, and report to the CAA on the level and content of the complaints?</p> <p style="text-align: right;">Partially</p>
	<p>The sponsor has only confirmed that they will gather all feedback and complaints received during implementation of the TDA which will be shared with the CAA. They advise within Section 6.3 of the Stakeholder Engagement Summary document that all stakeholders have the contact details for Flylogix and that there will be contact details in the AIC notifying the TDA and on the NOTAM. They have also advised within this section 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.</p> <p>The final submission document v6 appears to be missing an email address for complaints to be sent to since there is an incomplete sentence (section 5, sub-heading 27) – this is addressed as a discrepancy under Q10. The full CAP 1616 requirement is addressed by way of a condition within Q11 below.</p>
9	<p>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?</p> <p style="text-align: right;">No</p>
	<p>The sponsor has stated that there will be little or no impact on the flight path or volume of traffic flying below 7000ft over inhabited areas. Reasons are outlined within Section 6.2 of the Stakeholder Engagement Summary document. In summary the sponsor has provided the following rationale:</p>

	<ul style="list-style-type: none"> • The onshore part of the TDA will be established from surface to 1300ft therefore the majority of aircraft operating below 7000ft can fly over the TDA • Airspace users such as oil and gas helicopters flying offshore are known to operate between 1500 and 3000ft and are therefore unlikely to be affected by the TDA • The onshore segment of the TDA only extends over a small section of land which is sparsely populated • The UA will be at 800ft when operating over land. Flylogix testing shows that with the aircraft operating at 400ft AGL and at a distance of 1km away, the noise produced is less than or equal to 45dB (the aircraft will only be transiting over land, not holding), therefore any noise impacts will be minimal and for short periods of time. <p>Section 6 (noise assessment) of the final submission document also explains that the sponsor has conducted a review of FlightRadar24 which has shown negligible GA traffic (with transponders) within the vicinity of operations and therefore it is not anticipated that there will be any changes to traffic patterns. The submission document also states that Scatsta is situated next to bodies of water, therefore the travel of the UA overland is minimal, reducing impact to those on the ground.</p> <p>If the sponsor chooses to provide any further information, any maps they use should contain sufficient detail for any potentially impacted community stakeholders to identify where they live in relation of the changes in traffic patterns, in addition to contact details for the operator incase communities wish to provide feedback or submit a complaint.</p>	
10	<p>Taking the above considerations into account, does the SME recommend that this proposal has met the engagement requirements of the Temporary Airspace Change process?</p>	Partially
	<p>No issues were raised during engagement with aviation stakeholders. Although the original proposal has not changed as a result of the initial engagement, the sponsor has responded to feedback by addressing measures including SUACS provision, pre-notification of operations, NOTAM details and deconfliction of operations. The sponsor will:</p> <ul style="list-style-type: none"> • Liaise with Bristow SAR at the start of the campaign with their intended flying window and will advise them of any changes. • Contact local helicopter operators who are conducting flights to an oil and gas platform near the TDA in advance to get a schedule of their flights and deconflict where possible. • Liaise with the appropriate NATS Aberdeen Sector (Sumburgh Radar, Brent Radar or Aberdeen Radar) for confirmation of contact details prior to operations and ensure that all stakeholders identified are given the information. • Contact the appropriate NATS Aberdeen Sector to confirm they can provide a crossing service before issuing a NOTAM to activate the TDA. The frequency for the service will be published on the NOTAM and in the AIC, along with Flylogix’s contact details. • Liaise with Avinor when access to TDA Segment F is required Update 18/04: Based on the recent feedback from NATS, this won’t be 	

required but the sponsor should ensure all stakeholders (including Avinor) are aware of the change in TDA design.

- Be available for direct contact by telephone before and during operations if additional information is required.

Although no letters of Agreement (LoA) or TOIs have been referenced in the Engagement Summary Report during targeted aviation stakeholder engagement, the sponsor refers to a TOI with NATS Aberdeen within the Final submission document v8.

As explained under Q6, the sponsor will need to notify their full stakeholder group of the late change to the TDA design (TDA F) before operations as currently there is no evidence that stakeholders have been made aware of this change. This has been addressed as a condition under Q11.

There are a number of discrepancies that the sponsor should address:

It is recommended that the sponsor resolves the list discrepancies described below and provide updated versions of the submission documents to reflect the corrections, using clear version control.

Final submission document v8:

- Section 5, sub-heading 27: There is an incomplete sentence which appears to be missing an email address where feedback and complaints can be sent to, to be collated as part of the CAP 1616 requirements. These contact details should be added accordingly.
- Section 6 states that the TDA will be activated from 5 March to 2 June 2024 which is inconsistent with the rest of the submission. The sponsor should update this accordingly. [Update 12/04: Now partly resolved in v6 onwards of the final submission document – these documents state 2 May to 15 July but the rest of the final submission says 2 May 24 - 14 July 24 \(this is minor though as it's still within the 90 days they engaged on.](#)

Stakeholder Engagement Summary document v2 dated 28.03.2024:



- The fourth paragraph under Section 4 should be updated to accurately reflect the summary of engagement and which stakeholders were contacted and when (for example during early engagement and/or at the start of the formal engagement period). A rationale for which stakeholders were contacted during the early engagement should be included.
- Section 4 advises that a telephone conversation was held with Kirkwall (located in Orkney). The sponsor should confirm if this is a typo and if this is meant to say Tingwall. [Update 16/04: The sponsor has confirmed this is indeed an error and Tingwall was engaged - they have said they will update the Engagement Summary Report accordingly - awaiting receipt of this.](#)
- Avinor is not listed within the table on pages 1-2 of the Stakeholder Engagement Summary document, yet they were engaged. It is recommended they are added to this table for completeness (in addition to any other stakeholders engaged at a later date).

- Section 5.1.7 of the engagement summary report shows that the sponsor had a phone call with Bristow SAR. The minutes of this (and any follow up emails confirming the conversation) should be included within the engagement evidence. [Update 16/04: The sponsor has advised they will create some minutes for this](#)
- Sections 5.1 and 5.2 should be updated to accurately reflect the number of stakeholders who responded with either some feedback or no feedback.
- Section 5.2 says the AOG replied but there is no email in engagement evidence. The sponsor should update the document accordingly. [Update 16/04: The sponsor has advised this was an error and that AOG didn't respond – they will update the document accordingly.](#)
- Section 5.2 of the Stakeholder Engagement Summary document says that full stakeholder correspondence is included at Appendix 3.2, however within v2 it is labelled '7. Raw Stakeholder Feedback 5.1'. This should be updated appropriately.
- As per Section 5.3, the sponsor should provide a copy of the email correspondence which was sent out on the close of engagement.
- Section 6.1 of the Engagement summary report says "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. 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." Section 6.3.3 says "Flylogix will engage with Aberdeen Radar (NATS) to provide a Danger Area Crossing Service during the periods the TDA is active..." and Section 5.1.1 which describes the feedback from NATS says "As the TDA structure crosses several radar sectors, may we also suggest that a statement for the provision of DACS (SUACS) within the AIC should follow: "Within EG DXXXXX, a Danger Area Crossing Service (DACs) will be available from Sumburgh Radar or Brent Radar on the appropriate frequency as defined in UK AIP ENR 1.6 Paragraph 4.5.2.2."" In the assessment meeting, ATM wished to ensure that it was clear that it would be Aberdeen ATSU (Sumburgh Radar) that would be required to provide any service that would be allocated to the areas and not Anglia as detailed within the slides, and Flylogix advised that this will be updated. Please can the sponsor clarify and update the submission accordingly to accurately reflect who will be providing the SUACS, i.e. Sumburgh, Brent and Aberdeen (REBROS) Radar sectors? [Update 16/04: The sponsor has simply responded to say they will update this accordingly.](#)

Stakeholder engagement material:

- Although the maps in Figures 2 and 3 themselves are clear, the Figures could have been more clearly labelled as representing the designs both East and West of Shetland respectively. The title for Figure 3 for example is labelled as a 'Map of overland TDA Segments A, N-V' which isn't clear since segments all segments except A and N in this map are shown to be offshore in the map and this hasn't been clearly articulated in the text associated with the map. These issues appear to be copy/paste issues from another proposal. The sponsor should update these accordingly.

It is recommended that if the sponsor chooses to provide any further information, any maps they use should contain sufficient detail for any potentially impacted community stakeholders to identify where they live in relation of the changes in traffic patterns, in addition to

	contact details for the operator incase communities wish to provide feedback or submit a complaint.		
11	Are there any Condition(s) which the change sponsor must fulfil before activation (if approved)? If yes, please list them.	Yes	
	<p><u>Conditions</u></p> <ol style="list-style-type: none"> 1. The TOI that has been referred to should be finalised and provided to the CAA. If the final decision is to approve the ACP, finalised and signed copies of this from all parties mentioned will be required before the CAA approves activations of the TDA. 2. The sponsor should inform all stakeholders (including their wider stakeholder audience) of the decision (when published), the likely impacts and what will happen next. At a minimum, this will need to include information about any changes in dates for operation, contact details for providing feedback, information regarding the frequency of flights and when these will be conducted (weekends or weekdays or both) and changes to the TDA design, namely the removal of TDA F. Any feedback received regarding the changes should be addressed appropriately by the sponsor. 3. The sponsor should update the Engagement Summary Report to reflect details of the removal of TDA F and add the associated engagement summary and evidence with NATS Aberdeen and Avinor regarding this change. The sponsor should also explain the change in dates for operation within the updated Engagement Summary Report. 4. The sponsor must engage with Isavia ANS to ensure they are aware of the proposal, to ensure they have up to date contact details in the event of incursion into the Reykjavik FIR and agree how this would be coordinated as per they did for a previous ACP. Evidence of this engagement along with an updated engagement summary should be included in an updated version of the Engagement Summary Report. 5. The sponsor must make efforts to elicit a response from Gama Aviation and PDG Helicopters, address any feedback raised appropriately and add this engagement evidence and a summary of the engagement to an updated version of the Engagement Summary Report. 6. The sponsor is required to undertake regular engagement with stakeholders while the temporary change is in operation and to collate, monitor and report to the CAA on the level and contents of complaints associated with the TDA once it has been implemented and throughout its period of operation (para 303 CAP1616). This information is expected on a two-weekly basis throughout the duration of the TDA and should include nil returns. 		
Targeted Engagement Assessment sign-off			
	Name	Signature	Date
Assessment completed by Airspace Regulator (Engagement and Consultation)			19.04.2024