

# ACP-2023-015 - Apian Northumbria NHS Air Grid - part 3

## Response 1

### Aviation stakeholder engagement - part 3

Q1. What is your name?

[REDACTED]

Q2. What is your email address?

[REDACTED]

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

I am representing an organisation

[REDACTED]

Q4. Have you responded to either of our previous engagements for this project (ACP-2023-015)?

Yes

Q5. What is your position on the proposed Airspace Change Proposal?

NEUTRAL – I neither support nor object

Q6. Feedback

I have responded to earlier consultations. Whilst supportive of the use of new technology to deliver public services, including those of the NHS, I have voiced concerns over the impact of these drones on livestock. This aspect of the planned trial appears to have been totally ignored.

I have personal experience of cattle being spooked by hand held drones. What work has been done to assess the impact of these drones on cattle behaviour? It would seem that this has been ignored. Cattle are dangerous animals. Only today it is reported that 32 people have been killed by cattle in the UK over the last 5 years. Are you planning to add to that figure?

The other major livestock related concern is horses. What work has been done in this regard? It too would seem to have been ignored. There is a clear potential danger for those riding horses that may be spooked by drones. There is also possible danger for road users who may encounter spooked horses, either having thrown their riders or fled from their fields.

I would hope that some trial work is carried out in this regard before these drones are flown across our working countryside.

Apian replied individually by email to respondent

No

## Apian response back to the respondent

Thank you for your feedback.

We can confirm that your previous feedback has been considered and will be provided to the CAA as part of our application.

You may recall in our previous response to you that we shared noise attributes of the fixed-wing drone, these are significantly below hand-held drones that you mention in your feedback.

If our proposal is approved, we will be conducting community engagement and will share information on the expected levels of noise that the drone makes in operations. This will involve reaching out to local communities, including farming, who are located in the vicinity of the UAS flights to make them aware of our trial and inform them of the feedback mechanism.

In the meantime, we would like to share the drone operators website [www.flyzipline.com](http://www.flyzipline.com), which has a number of videos that show how the UAS operates (please be advised we are proposing to operate the P1 platform).

We would welcome a call with you to discuss any information which you would find beneficial at this stage. Please let us know if this is something you would like us to arrange.

Kind regards,  
Aviation Team

## Response 2

### Aviation stakeholder engagement - part 3

Q1. What is your name?

[REDACTED]

Q2. What is your email address?

[REDACTED]

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

I am responding as an individual

Q4. Have you responded to either of our previous engagements for this project (ACP-2023-015)?

Yes

Q5. What is your position on the proposed Airspace Change Proposal?

OBJECT – I object to the proposed changes

## Response 3

### Aviation stakeholder engagement - part 3

Q1. What is your name?

██████████

Q2. What is your email address?

██

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

I am responding as an individual

Q4. Have you responded to either of our previous engagements for this project (ACP-2023-015)?

Yes

Q5. What is your position on the proposed Airspace Change Proposal?

OBJECT – I object to the proposed changes

Q6. Feedback

this initiative is really not needed, it is going to impact hugely the existing airspace users in the tyne valley. there are already organisations in place such as blood bikes that can carry out the operations that are suggested to be taken over by apian. it is an expensive vanity project which will also conveniently line the pockets of the very ones pushing it.

## Response 4

### Aviation stakeholder engagement - part 3

Q1. What is your name?

██████████

Q2. What is your email address?

██

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

I am representing an organisation

**Organisation**

██████████

Q4. Have you responded to either of our previous engagements for this project (ACP-2023-015)?

Yes

Q5. What is your position on the proposed Airspace Change Proposal?

SUPPORT – I support the proposed changes

Q6. Feedback

You have now mentioned emergency service helicopter access but you have not mentioned critical flights in support of the national infrastructure. Pylon, pipeline and trainline to name just a few. These are time critical if there is a breakdown in service

Apian response back to the respondent

Thank you for your response.

As part of our aviation stakeholder engagement we are in contact with other rotary users who may require access to the TSA/TDA during our proposed operations to support emergency work as required. Pipeline inspections, national grid and network rail are among those that we are in contact with. We anticipate having a Letter of Agreement with them, much like we will do with emergency services, to ensure we can deconflict their operations, and continue to work with them to ensure this is completed in advance of our application.

If you have any further questions or would like to discuss this with us, we would be happy to organise a call.

Kind regards,  
Aviation Team

## Response 5

### Aviation stakeholder engagement - part 3

Q1. What is your name?

██████████

Q2. What is your email address?

████████████████████

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

I am responding as an individual

Q4. Have you responded to either of our previous engagements for this project (ACP-2023-015)?

Yes

Q5. What is your position on the proposed Airspace Change Proposal?

OBJECT – I object to the proposed changes

Q6. Feedback

I am a pilot based at a farm strip in ████████████████████  
My airfield is between Eshott and your proposed changes to class G airspace in Northumberland.

My response is supported by the document found in the link I have provided. I also support all previous objections to your plans based on the need for safety in the transit routes around Newcastle airspace.

<https://mag.nationalhealthexecutive.com/articles/drone-deliveries-in-healthcare-busting-the-airborne-myths-and-landing-in-reality>.

This report clearly shows there is evidence from previous NHS drone trials in other regions of the UK. It supports my belief that your claim for the use of drones to deliver essential medical products faster is unclear. You appear to dismiss or ignore the established systems. Emergency transportation is only a fraction of the transportation needs of the NHS and almost all treatment is planned including the location of patient and medication.

Apian seem to support the misleading reporting of “good news” stories regarding the transporting of essential medical supplies to advantage your business case.

The cost savings are misrepresented using the potential time saved as the only significant factor. There is a potential cost increase of 100% over current delivery methods and takes no account of poor weather hold ups. These inclement conditions have minimal effect on road transportation. Road transport has proven it is cost effective as vehicles can easily be diverted to other tasks.

I am not opposed to the use of drones however their use as Apian are proposing is wrong. Drones are ideal for survey work in “visual meteorological conditions” and line of sight.

## Response 6

### Aviation stakeholder engagement - part 3

Q1. What is your name?

██████

Q2. What is your email address?

████████████████████

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

I am responding as an individual

Q4. Have you responded to either of our previous engagements for this project (ACP-2023-015)?

Yes

Q5. What is your position on the proposed Airspace Change Proposal?

OBJECT – I object to the proposed changes

Q6. Feedback

The typo in your e-mail subject leaves me with no confidence you will exhibit the required attention to detail in your trial.

More importantly I would draw your and CAA's attention to this research in an NHS publication:  
<https://mag.nationalhealthexecutive.com/articles/drone-deliveries-in-healthcare-busting-the-airborne-myths-and-landing-in-reality>

This research, by 2 well-qualified medical doctors, debunks many of the claims made by the drone industry and suggest the NHS would be better exploring ways to improve the efficiency of its current operations than by wasting money on drone trials. Comments like "Reporting of trials .... has been misleading" and "Misinformation around saving time, energy and lives ..."

The researchers state "using drones to serve all sites would more than double the cost..." and "The clinical advantages to faster last-mile delivery are unclear..."

And they conclude that while drones MIGHT offer some advantages trial findings need to be "transparent" and "feed into a deeper evaluation of the potential benefits". Piecemeal trials like this one offer no transparency and no benefit except to the individual drone companies.

Not only is this particular trial flawed but so too is the whole process of allowing individual, incoherent trials. I remain opposed to this trial.

## Response 7

### Aviation stakeholder engagement - part 3

Q1. What is your name?

[REDACTED]

Q2. What is your email address?

[REDACTED]

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

I am responding as an individual

Q4. Have you responded to either of our previous engagements for this project (ACP-2023-015)?

Yes

Q5. What is your position on the proposed Airspace Change Proposal?

NEUTRAL – I neither support nor object

Q6. Feedback

Very little change to the actual airspace but the ability to NOTAM when the airspace is not needed is a positive.

I personally still do not understand the efficacy of this trial nor what the trial is trying to prove so it is difficult to assess whether this is an effective use of the airspace or tax payers money. Any further clarification on this point would be useful.



## Response 8

### Aviation stakeholder engagement - part 3

Q1. What is your name?

████████

Q2. What is your email address?

████████████████████

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

I am responding as an individual

Q4. Have you responded to either of our previous engagements for this project (ACP-2023-015)?

Yes

Q5. What is your position on the proposed Airspace Change Proposal?

OBJECT – I object to the proposed changes

Q6. Feedback

This ACP will still impact my flying and so on that basis, I continue to object.

## Response 9

### Aviation stakeholder engagement - part 3

Q1. What is your name?

[REDACTED]

Q2. What is your email address?

[REDACTED]

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

I am representing an organisation

**Organisation**

[REDACTED]

Q4. Have you responded to either of our previous engagements for this project (ACP-2023-015)?

Yes

Q5. What is your position on the proposed Airspace Change Proposal?

OBJECT – I object to the proposed changes

Q6. Feedback

This ACP will have a negative effect on our gliding and so we continue to object to it's implementation.

## Response 10

### Aviation stakeholder engagement - part 3

Q1. What is your name?

██████████

Q2. What is your email address?

██████████

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

I am responding as an individual

Q4. Have you responded to either of our previous engagements for this project (ACP-2023-015)?

No

Q5. What is your position on the proposed Airspace Change Proposal?

OBJECT – I object to the proposed changes

Q6. Feedback

I object on the nudge principle, that the proposal is for public good when realities are purely commercial. A motorbike courier could do the NHS work for a fraction of the cost!

Drones will be used, and the operators will get government airspace, so objecting is a waste of my time, but you wanted my opinion and you can now delete this thread because I will get ignored.

# Response 11

## Aviation stakeholder engagement - part 3

Q1. What is your name?

[REDACTED]

Q2. What is your email address?

[REDACTED]

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

I am representing an organisation

**Organisation**

[REDACTED]

Q4. Have you responded to either of our previous engagements for this project (ACP-2023-015)?

Yes

Q5. What is your position on the proposed Airspace Change Proposal?

OBJECT – I object to the proposed changes

Q6. Feedback

This ACP will have a negative effect on our gliding and so we continue to object to it's implementation.

# Response 12

## Aviation stakeholder engagement - part 3

Q1. What is your name?

[REDACTED]

Q2. What is your email address?

[REDACTED]

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

I am responding as an individual

Q4. Have you responded to either of our previous engagements for this project (ACP-2023-015)?

Yes

Q5. What is your position on the proposed Airspace Change Proposal?

NEUTRAL – I neither support nor object

Q6. Feedback

I think you have a big problem with altimetry. Any aircraft transiting Newcastle's Class D airspace will be using Newcastle's local QNH for their altimeter datum, as advised by the Newcastle controller at that instant. And within that Class D airspace you have drone Area A with its upper limit at 700ft AMSL. Newcastle's QNH may or may not be exactly the same as the pressure at sea level. And in any case, how is the pilot in flight going to know the QNH you are using for all of your areas - which will change from hour to hour?

Big penalties are applied to pilots who bust their airspace clearances - and the usual reason is that the pilot has used the wrong altimeter datum. You certainly cannot have a pilot in Class D airspace changing to another pressure setting for avoiding the top of your drone area.

As you don't appear to have a radio frequency or ATIS or whatever - how is a pilot transiting over your drone areas going to know what pressure datum you are using at that precise time? It won't matter much on nice sunny days, whilst clear of controlled airspace, when they can give them ample vertical clearance. But it will be very important on low cloud days when pilots may be skimming the top of these drone areas in order to get to their destination.

Apian replied individually by email to respondent

No

Apian response back to the respondent

Thank you for your response.

We are familiar with the impact pressure variations can have on flight in differing airspace. We are required in accordance with CAA regulation to apply for a TSA/TDA using the ICAO standard AMSL.

If you would like to discuss this further, we would be happy to organise a call.

Kind regards,  
Aviation Team



## Response 13

### Aviation stakeholder engagement - part 3

Q1. What is your name?

██████████

Q2. What is your email address?

████████████████████

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

I am representing an organisation

**Organisation**

████████████████████

Q4. Have you responded to either of our previous engagements for this project (ACP-2023-015)?

Yes

Q5. What is your position on the proposed Airspace Change Proposal?

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

## Response 14

### Aviation stakeholder engagement - part 3

Q1. What is your name?

[REDACTED]

Q2. What is your email address?

[REDACTED]

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

I am responding as an individual

Q4. Have you responded to either of our previous engagements for this project (ACP-2023-015)?

Yes

Q5. What is your position on the proposed Airspace Change Proposal?

OBJECT – I object to the proposed changes

Q6. Feedback

West Wales already has designated dedicated drone testing areas operating from Aberporth Airport EGFA.

Designated Danger Areas D201A-K

This is where the testing should take place.

There is no need for further airspace restrictions for this purpose in the UK.



## Response 15

### Aviation stakeholder engagement - part 3

Q1. What is your name?

██████████

Q2. What is your email address?

████████████████████

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

I am responding as an individual

Q4. Have you responded to either of our previous engagements for this project (ACP-2023-015)?

Yes

Q5. What is your position on the proposed Airspace Change Proposal?

OBJECT – I object to the proposed changes

Q6. Feedback

I am a pilot who flies in Northumbria. There are restrictions already in place that have made West Wales the designated and dedicated drone testing area operating from Aberporth Airport EGFA.

Designated Danger Areas D201A-K

I believe this is where the testing should take place and there is no need for further airspace restrictions for this purpose in the UK.

## Response 16

### Aviation stakeholder engagement - part 3

Q1. What is your name?

██████████

Q2. What is your email address?

████████████████████

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

I am responding as an individual

Q4. Have you responded to either of our previous engagements for this project (ACP-2023-015)?

Yes

Q5. What is your position on the proposed Airspace Change Proposal?

OBJECT – I object to the proposed changes

## Q6. Feedback

The justification for this significant restriction of airspace has not been made. Nowhere in the supporting material is there any explanation of the aims and objectives of the trial and how it is intended to build on the numerous previous UAS trials supposedly aimed at medical deliveries, undertaken around the country over several years.

Even NHS personnel are questioning publicly the real value of trials of this type and the supposed advantages they bring: <https://mag.nationalhealthexecutive.com/articles/drone-deliveries-in-healthcare-busting-the-airborne-myths-and-landing-in-reality>

If airspace is to be used for these purposes there, and other airspace users considerably impacted negatively, it is only reasonable that a logical and comprehensive case is made; the Aviation Stakeholder Engagement Material does not attempt to do this. Rather, it begins from a position that this is an inherently positive and socially acceptable activity (questionable, and no supporting evidence is provided) and goes on from there.

The proposed TDA within Class G provides a major impediment to VFR traffic and closes off the gap between the Newcastle Class D and Spadeadam Danger Area EGD510C in poor weather (eg low cloudbase). It has the potential to increase the hazard to other crewed airspace users. Not least given the terrain and high masts to be found in that area.

Regardless of the details of this particular ACP, there is on the face of it no apparent need to use this specific airspace (and there has is no material made available to show otherwise) to conduct such a trial given the Danger Area airspace that already exists elsewhere in the UK and is specifically identified as suitable for BVLOS UAS testing - particular examples of which include the extensive EGD201 complex in West Wales.

Consequently, not only is the trial premise apparently lacking a firm foundation or social justification, the trial execution can actively increase the risk to life for existing airspace users.

This trial and ACP should be paused by the Airspace Regulator until a properly evidenced and proportionate argument has been made to them that the trial objectives can only be achieved in this location and that they justify the negative impact on other users.

The Airspace Regulator should insist on a properly argued justification - which takes into account coordination with previous trials and outcomes to ensure that there is no duplication of trials data that has been previously collected - for a particular trial in a particular location as minimum entry criteria to any ACP submitted in support of a trial of this type. That proportionate argument should be a precursor to following the policy laid down in CAP2533.

## Response 17

### Aviation stakeholder engagement - part 3

Q1. What is your name?

██████████

Q2. What is your email address?

██████████████████

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

I am responding as an individual

Q4. Have you responded to either of our previous engagements for this project (ACP-2023-015)?

No

Q5. What is your position on the proposed Airspace Change Proposal?

OBJECT – I object to the proposed changes

Q6. Feedback

I totally object to this app. I fly a glider. If I get low and cannot gain height or run into rain I would be forced to land. If over your proposed ACP I would risk hitting one of your drones.

I see you follow the Tyne valley railway line. I suggest this proposal is a aim to improve your pocket and using the NHS as a cover

## Response 18

### Aviation stakeholder engagement - part 3

Q1. What is your name?

██████████

Q2. What is your email address?

██████████████████

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

I am representing an organisation

**Organisation**

██████████

Q4. Have you responded to either of our previous engagements for this project (ACP-2023-015)?

Yes

Q5. What is your position on the proposed Airspace Change Proposal?

NEUTRAL – I neither support nor object

## Response 19

### Aviation stakeholder engagement - part 3

Q1. What is your name?

[REDACTED]

Q2. What is your email address?

[REDACTED]

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

I am responding as an individual

Q4. Have you responded to either of our previous engagements for this project (ACP-2023-015)?

Yes

Q5. What is your position on the proposed Airspace Change Proposal?

NEUTRAL – I neither support nor object

Q6. Feedback

I wish you well. I now look forward to the start of the trial. Also, I wish to be invited to attend as an observer to see both the departure of the drone, from Cramlington, and its arrival, with parachute delivery, at Haltwhistle.

## Response 20

### Aviation stakeholder engagement - part 3

Q1. What is your name?

[REDACTED]

Q2. What is your email address?

[REDACTED]

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

I am representing an organisation

**Organisation**  
Great North Air Ambulance Service

Q4. Have you responded to either of our previous engagements for this project (ACP-2023-015)?

Yes

Q5. What is your position on the proposed Airspace Change Proposal?

SUPPORT – I support the proposed changes

Q6. Feedback

We are happy to support the ACP as long as we are guaranteed short notice access (less than 5 min to any of the operating areas).

It was also felt that it would be a good idea for the drone operator to contact our Air desk each day prior to the start of operations. This would prove the line of communication but also act as a reminder to our wider team that the trial is taking place.

It would also be of benefit if the drones were fitted with ADS-B out as well as in.

## Response 21

### Aviation stakeholder engagement - part 3

Q1. What is your name?

[REDACTED]

Q2. What is your email address?

[REDACTED]

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

I am responding as an individual

Q4. Have you responded to either of our previous engagements for this project (ACP-2023-015)?

Yes

Q5. What is your position on the proposed Airspace Change Proposal?

SUPPORT – I support the proposed changes

Q6. Feedback

Thanks for the update - there is nothing in the adjustments that requires further comment.



## Response 22

### Aviation stakeholder engagement - part 3

Q1. What is your name?

[REDACTED]

Q2. What is your email address?

[REDACTED]

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

I am representing an organisation

**Organisation**  
Ministry of Defence (MOD)

Q4. Have you responded to either of our previous engagements for this project (ACP-2023-015)?

Yes

Q5. What is your position on the proposed Airspace Change Proposal?

NEUTRAL – I neither support nor object

Q6. Feedback

No additional concerns, above those previously provided, have been identified by the MOD for the changes described in the stakeholder part 3 document. The MOD remain willing to work with Apian on this ACP and encourage a continuation of the communication lines already established.

## Response 23

### Aviation stakeholder engagement - part 3

Q1. What is your name?

[REDACTED]

Q2. What is your email address?

[REDACTED]

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

I am representing an organisation

**Organisation**

[REDACTED]

Q4. Have you responded to either of our previous engagements for this project (ACP-2023-015)?

Yes

Q5. What is your position on the proposed Airspace Change Proposal?

NEUTRAL – I neither support nor object

Q6. Feedback

Looking at the previous update and this the latest we are now outside area B and we can see no reason why the trials will interfere with our hobby.  
Good luck with your trials.

## Response 24

### Aviation stakeholder engagement - part 3

Q1. What is your name?

[REDACTED]

Q2. What is your email address?

[REDACTED]

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

I am responding as an individual

Q4. Have you responded to either of our previous engagements for this project (ACP-2023-015)?

Yes

Q5. What is your position on the proposed Airspace Change Proposal?

NEUTRAL – I neither support nor object

Q6. Feedback

With regard to the latest changes to the Drone Trial Plan.

The reduction in size and height of area A is sensible but the maximum height amsl of A and B should be 700'.

The height of all other areas C,D,E,F and G should not exceed 1000' amsl.

With regard to access by Helimed or other emergency services it is evident that there is still not a workable plan. It is not a matter of emergency services having priority. Emergency services require immediate access to any part of the Temporary danger areas. This means without a seconds delay. A freedom of information request has revealed that in the last 12 months the A 69 road from Newcastle to Brampton has had 15 serious road traffic accidents. A large proportion of the A 69 is inside TDAs F and G. There is a very high probability that during your proposed trial Helimed will require immediate access to the A 69. I can only imagine what would happen should the Air Ambulance be delayed by drone traffic. Who takes responsibility for the delay should it lead to a death.

I have stated that I am neutral on this trial and that is how I feel. However as time has gone by and I have learned more about it and studied the reasons for it I increasingly think that the stated improvements in delivery and just in time delivery of emergency medication and cancer drugs is all a whitewash. In reality we already have a reliable electrically powered service delivering and collecting as required.

## Response 25

### Aviation stakeholder engagement - part 3

Q1. What is your name?

[REDACTED]

Q2. What is your email address?

[REDACTED]

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

I am representing an organisation

**Organisation**  
Bristow Search and Rescue Humberside

Q4. Have you responded to either of our previous engagements for this project (ACP-2023-015)?

Yes

Q5. What is your position on the proposed Airspace Change Proposal?

NEUTRAL – I neither support nor object

## Response 26

### Aviation stakeholder engagement - part 3

Q1. What is your name?

██████████

Q2. What is your email address?

██████████

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

I am responding as an individual

**Organisation**

██████████

Q4. Have you responded to either of our previous engagements for this project (ACP-2023-015)?

Yes

Q5. What is your position on the proposed Airspace Change Proposal?

OBJECT – I object to the proposed changes

Q6. Feedback

I Cant see how pushing your requested airspace to Spadeadam creating a dangerous" cul de sac" for aircraft that use the corridor to travel West to South East Scotland and visa versa, Not just GA pilots but air ambulance use it frequently,

The weather can be VFR but clouds gather on either side of the moors and drift over valley quite often, This would require a u turn or risk violating Spadeadam or your own proposed space or more dangerous being forced into cloud, To go around will double the distance and involve Newcastle Radar, who we know are constantly short staffed and create an extremely busy east of Newcastle area over the sea

We also have the constant jamming trials which Spadeadam admits can jam far into the valley,

I also question if the trial should not be done Oct thru March to give a realistic view of feasibility in usual Northern weather.

I would suggest that at the very minimum a contact radio should be in force AND a third party to monitor if Notams are being lifted in a timely fashion when airspace not being used.

If drones are so accurate why such a wide corridor?

Is it because drone operators have lost contact with the drones in the past?

Also

A clear corridor between spade adam and Hexam to avoid a "cul de sac" scenario if low cloud drifts over stopping a plane from descending into the propposed zone,

This is a very popular route for pilots which is already tight with topography, Spadeadam, Newcastle and Northern weather.

I fear the possibility of conflict or god forbid worse will be very high if this is allowed to stand as is,

Regards

██████████

## Response 27

### Aviation stakeholder engagement - part 3

Q1. What is your name?

██████████

Q2. What is your email address?

██████████

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

I am responding as an individual

**Organisation**

██████████

Q4. Have you responded to either of our previous engagements for this project (ACP-2023-015)?

Yes

Q5. What is your position on the proposed Airspace Change Proposal?

OBJECT – I object to the proposed changes

Q6. Feedback

This response should be read in conjunction with my previous 2 responses.

1. The upper limits of all the proposed TDA's is too high to allow VFR traffic to safely fly between the TDA and cloud base.
2. The TDA's are directly over existing VRP's - making them un-usable for VFR navigation.
3. The trial should take place at night time, when it is very unlikely that there will be VFR traffic flying at low altitudes.
4. No provision is made to avoid delays for the emergency helicopter (HEMS) service flights needing to land within a TDA.
5. You have not explained why the TDA's could not be within the Newcastle airspace, and controlled by them.