



Subject: ACP-2022-106 - Additional Information Required
Date: 08 May 2024 20:32:21
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Following review of your submission we have been unable to make a decision for ACP-2022-106 because the submission was lacking in sufficient information in some areas. We have outlined these areas below but we believe it would be beneficial to have meeting to explore these points in a bit more detail. Please let me know if you would like to set up a meeting and I will coordinate CAA calendars and offer some potential times.

Technical

- The trial plan does not provide sufficient detail on the data and outcomes you are aiming to test/prove that will determine whether or not the trial has been a success.
- The engagement material and trial plan do not provide sufficient information regarding the planned Danger Area activations to enable us, or other airspace users, to assess the potential impact of the ACP. More detail is required regarding proposed dates, days and times of activation.
- There has been no attempt to conduct a traffic analysis and the rationale provided for this is not sufficient. Further information is required on the traffic environment within which the proposed temporary DA will be established, with relevant information included in any future engagement material.
- The technical language used in the submission and the engagement material is inconsistent and in some cases does not accurately describe how the Danger Areas will be operated.

Engagement

- There is an inconsistency in the stated proposed operational period for the trial within the engagement material and the submission. At one point this is stated to be operational from June 2024, at others it is stated to be operational July to November 2024.
- Clarity and more detail required regarding the stubs. The engagement material shows the proposed TDA with 4 stubs. The final design shows 2 stubs. There is an explanation that one stub was removed for operational reasons. There is no statement regarding which stub this refers to and there is a lack of explanation regarding the 4th stub. The purpose of stubs is also not clearly stated.
- There is reference to the widening of the TDA on CAA advice on safety/operational grounds. The sponsor is required to provide more detail, and state which CAA department has provided the advice.
- There is no explanation as to the way in which the TDA has been widened, or which sections this applies to. Explanatory text/diagrams should be provided.
- Within the Trial Plan it is stated that the TDA will be activated *predominantly* in daylight hours. Within Appendix: Noise Assessments it is stated that activation will be *within daylight hours only*. Clarification is required.
- Detail should be provided regarding the specific type of aircraft to be used.
- Regarding the widening of the TDA, there is an assessment that no significant impact will result on new stakeholders overflown, or impacts, compared to the engagement and so no further engagement is required. An explanation is required as to why this conclusion has been reached.
- The sponsor should re-engage with their full stakeholder audience so that stakeholders have sight of the additional detail, explanations and areas of clarification required by the CAA. Stakeholders should be given reasonable and adequate time to provide their feedback. A rationale for the length of this re-engagement should also be included.
- Suggestions were made by respondents to the engagement activity that the sponsor add new stakeholders to their stakeholder list. These included Natural England. The sponsor should add Natural England and any other suggested stakeholders (not already added) and

include them in the new engagement activity mentioned above.

Within any re-submitted stage 4 documentation for the CAA, the sponsor should:

- Submit to the CAA the permissions/agreements from landowners of the landing sites.
- Provide more robust rationale to support the 4-week period of engagement period initially allowed for stakeholder responses.
- Provide rationale for the length chosen of a 3-day extension to the engagement period and the factors that were considered in making the decision to extend for that duration.

Environmental

- Within the noise assessment, it is not clear if the +10dB tone correction, applicable to multi-rotor aircraft, has been applied to the LAm_{ax} noise data provided in Appendix 11: Noise Assessments.
- The CAA require the co-ordinates or location plan for the locations intended to be used for the trials take-off and landing sites.
- It is not clear which aircraft will be used during the trial; clarification is required.

In addition to the above, we are aware from our RPAS team that currently the detail provided for the submission would not be sufficient to make a full assessment, regarding the requested operational area. An oversight report has been produced detailing the high-level areas that will be required for the initial assessment. Please liaise directly with your point of contact in the CAA RPAS team if you need to discuss this further.

Regards,

[Redacted signature block]

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