

Annex G: Summary of Targeted Aviation Stakeholder feedback – London Health Bridge V1.5

Version 1: Submission to CAA

Version 1.1: Updated with engagement from second stakeholder engagement

Version 1.2: Summary of feedback added

Version 1.3: Summary of third stakeholder engagement added

Version 1.4: Introduction updated to include reference to third engagement period, [REDACTED]

Version 1.5: Emails added from London Met Police to confirm the email summarising the agreements. Summary of feedback from British Transport Police added; Summary of fourth stakeholder engagement added (section 4). Format of document updated for ease of reading

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1. Introduction

This document forms part of the Airspace Change Process (ACP) as defined in the Civil Aviation Publication (CAP)1616. Apian, the change sponsor, is seeking to establish a Temporary Reserved Area (TRA) during notified periods to enable the safe beyond visual line of sight (BVLOS) uncrewed aircraft systems (UAS) operations, in London in partnership with Guy's and St Thomas' NHS Foundation Trust (GSTT). Details of the trial can be found on the ACP portal ([ACP-2023-061](#)).

This document summarised the feedback from Targeted Aviation Stakeholders. Details of the approach taken can be found in the Stakeholder Engagement Plan.

We conducted four rounds of stakeholder engagement.

- **First engagement period** 6th October 2023 – 17th November 2023. [Briefing material 1](#) was shared with targeted aviation stakeholders which included information on the TRA such as dimensions and operating procedures. These stakeholders were invited to provide feedback on the operational and safety aspects of the TRA between the 6th of October 2023 and 17th of November 2023.

The engagement period lasted 6 weeks, this was considered proportionate and was agreed for the following reasons:

- The engagement was limited to relevant aviation stakeholders who are legally allowed to operate within the TRA.
 - Procedures are proposed to allow access for emergency services at short notice.
- **Second engagement period** 2nd January 2024 – 16th January 2024. Stakeholders were further contacted at the start of 2024 and provided information regarding the change to the start and end date of the trial, and the TRA height which is noted as 450 ft AMSL. Please see [briefing material 2](#).

A summary of feedback from the first and second stakeholder engagement can be found in [Section 2](#).

- **Third engagement period** 21st February 2024 – 6th March 2024. Provided the identified stakeholder group with information on the proposed extended timeline adjustments made as a result of the ongoing regulatory processes. Information was shared with these stakeholders via email.

A summary of feedback from the third stakeholder engagement period can be found in [Section 3](#).

- **Fourth engagement period** 13th June 2024 – 28th June 2024. Provided the identified stakeholder group with information on the proposed extended timeline adjustments. Information was shared with these stakeholders via email.

A summary of feedback from the fourth stakeholder engagement period can be found in [Section 4](#).

2. Stakeholder engagement (first and second engagement periods)

Apian conducted the first aviation stakeholder engagement between 6th Oct 2023 - 17th November 2023, [Briefing material 1](#) was shared with targeted aviation stakeholders which included information on the TRA such as dimensions and operating procedures.

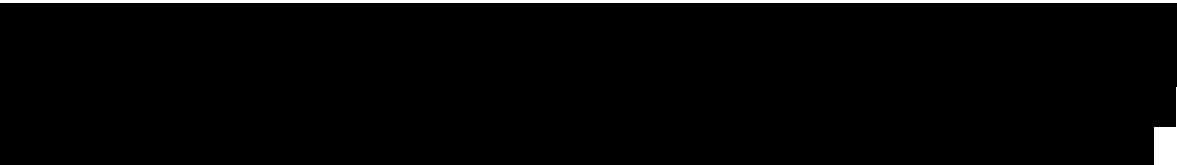

A second engagement period was held between 2nd January 2024 - 16th January 2024, updating the stakeholders on an adjustment in timelines and height of the proposed TRA ([Briefing material 2](#)).

Apian received email feedback from 12 stakeholders as part of the first stakeholder engagement period. A detailed review of the feedback received through engagement was undertaken to determine its impact, if any, on the trial. There were 8 stakeholders who provided feedback to the second stakeholder engagement period. Full feedback can be found in [Appendix A](#).

The following provides a summary of responses from aviation stakeholders on the TRA complex proposals.

Emergency service operators were contacted in advance of the formal stakeholder engagement to discuss mitigations to ensure safe deconfliction with their operations.

A. Emergency service operators

- Emergency service aircraft are authorised to conduct flight operations at low level if required. However, they all stated that it was highly unlikely for them to be below 500ft in this area for transits, due to the height of the buildings. Transits regularly took place at approximately 1000ft.
- Emergency service (HEMS) stated that they may be required to land in the TRA in response to a tasking, whilst this was not a daily occurrence, they would need access to the area at short notice.
- Other emergency services confirmed it was unlikely that they needed to land in the TRA, but that it should be made possible if required.
- Some of the emergency services stated that they may need to operate VLOS drones within the area, and confirmed they do not operate BVLOS.
- 
- 
- London Metropolitan Police confirmed the majority of their VLOS operations are planned, but their operator reviews NOTAMs before operations.

- [REDACTED]

B. Military operations

- The military confirmed that there will be negligible impact on their operations.

C. ANSP/Aerodromes

- London Heliport confirmed that the TRA would not affect their operations.
- NATS confirmed that they have been working with Apian to ensure access for emergency services, and confirmed that they are comfortable with the measures put in place and agree with them.

D. Other operators

- National Grid and Network Rail confirmed there was no impact on their operations.
- Network Rail noted that VLOS activities in the area were minimal, and that the NOTAM was an appropriate mitigation measure ensuring contact details are provided.
- ARPAS noted that VLOS operators may request to operate in the TRA, and noted contact details on the NOTAM would be an appropriate mitigation.

E. Other

- The Airprox Board, whilst supportive, noted the H4 of the London Heli Lanes. They suggested that 500ft could be the minimal separation between aircraft and the UAS, and suggested the use of ADS-B out.

Apian's response

Apian values the feedback that aviation stakeholders have taken the time to provide, and look forward to working with them (and the CAA) to agree on an airspace design and robust deconfliction process, that satisfies everyone where reasonably practicable. Having reviewed this feedback, Apian considers and/or proposes the following:

- Developed and agreed safe procedures to ensure emergency services (crewed and uncrewed) can access the airspace at short notice with NATS and the UAS Operator.
- Agreed to include contact information and instructions on the NOTAM for non-emergency VLOS operators to request access.
- Provided appropriate feedback regarding the requirement of a TRA, mitigations with other crewed aircraft and confirmed the Operational Safety Case requirements regarding the operations of the UAS.

Based on the feedback received, no changes to the proposed TRA area or trial procedures were judged to be necessary.

Summary table of communication

	First stakeholder engagement				Second stakeholder engagement		
Organisation	Emails received		Proposed Emergency Services and Military Procedures	Status	Emails received		Status
	Email 1 6th Oct 2023	Email 2 7th Nov 2023			Email 3 14th Nov 2023	Email 4 2nd Jan 2024	
Airprox Board			N/A	No Response		N/A	Support
ARPAS			N/A	Support			Support
Bristow		N/A		Support			No further response
British Helicopters Association			N/A	No Response			No Response
Drone Major group			N/A	No Response			No Response
Helicopter Club of Great Britain			N/A	No Response			No Response
Kent and Surrey Air Ambulance			N/A (requested LAA take lead)	No Response			No Response
London Air Ambulance (LAA)				Support			Support (verbal)
London Fire Brigade				Support			No further response
London Heliport			N/A	Support		N/A	Support
London Metropolitan Police				Support*		N/A	Support

Port of London				No Response			No Response
Maritime Coastguard Agency				Support			No further response
MoD		N/A		Support			No further response
NATS			N/A	Support		N/A	Support
National Grid			N/A	Support			Support
Network Rail				Support*		N/A	Support
NPAS				Support*			No further response

*Emails were sent as a reminder to these organisations, and feedback was provided after the end of the first stakeholder engagement window and before the start of the second stakeholder engagement period. These are operators who may require access as part of emergency response. Therefore we wanted to ensure that they had provided feedback as they are allowed to operate in the TRA area.

3. Stakeholder engagement (Third engagement period)

Apian conducted further aviation stakeholder engagement between 21st February 2024 - 6th March 2024, asking for feedback relating to the safety and operational aspects of these timelines.

Given the uncertainty in aligning the regulatory approvals of the Operational Authorisation and the Airspace Change Process (and subsequent AIC Cycles) aviation stakeholders were asked to provide feedback to operate for 6 months, with a tentative start date between May and July 2024.

5 stakeholders responded to the request. The following provides a summary of responses from aviation stakeholders on the TRA complex proposals. Full feedback can be found in [Appendix B](#).

- **Emergency service operators.** London Air Ambulance and the London Met Police confirmed receipt of the email and did not raise any safety or operational concerns.
- **Military operations** The military confirmed that there will be negligible impact on their operations due to the adjustment in timelines
- **ANSP/Aerodromes** NATS confirmed that the adjustment in timelines did not change their feedback
- **Other operators** The British Helicopter Association requested details of the processes in place with emergency services, on receipt they confirmed that they had no comments [REDACTED]

Annex B Emergency Services and Military Operations

The updated version of Annex B: TRA Access for Emergency Services and Military Operations V1.2 was shared with Emergency Services and Military on 21st February 2024. No further comments have been received, however, this was not expected as this document has been shared previously.

Apian's response

Apian values the feedback that aviation stakeholders have provided and the time it takes to review and respond to change requests. Apian concluded that there was no impact from the revised timelines and therefore has not made any adjustments following the extended timeline stakeholder engagement.

[REDACTED]

[REDACTED]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

Summary table of communication

	Extended timeline engagement			
Organisation	Emails received		Proposed Emergency Services and Military Procedures	Status
	Email 6 21st Feb 2024	Email 7 1st March 2024	Email 3 22 Feb 2024	
Airprox Board			N/A	No Response
ARPAS			N/A	No Response
Bristow				No response
British Helicopters Association			Sent as part of feedback on 4th March	Support
Drone Major group			N/A	No Response
Helicopter Club of Great Britain			N/A	No Response
Kent and Surrey Air Ambulance				No Response
London Air Ambulance (LAA)				Support
London Fire Brigade				No Response

London Heliport			N/A	No Response
London Metropolitan Police		N/A		Support
Port of London				No Response
Maritime Coastguard Agency				No Response
MoD		N/A		Support
NATS			N/A	Support
National Grid			N/A	No Response
Network Rail			N/A**	No Response
NPAS				No Response

** Following the response from Network Rail on the impact of their operations, and that a NOTAM would be appropriate way for them to request access, they were removed from Annex B.

4. Stakeholder engagement (Fourth stakeholder period)

British Transport Police (BTP)

Following feedback from the London Metropolitan Police, the British Transport Police were contacted outside the formal stakeholder engagement periods. Information on the trial and operations that had been previously shared with stakeholders was shared with the BTP, this included Annex B.

The BTP provided the following feedback;

- Confirmed that they were supportive of the trial and did not expect it to affect them significantly
- [REDACTED]
- Confirmed that while it was minimal operations [REDACTED], they would like to ensure they can gain access at short notice to the TRA.
- Asked to be kept in contact once the trial is authorised to ensure the teams are briefed.

Apian's response

- Apian confirmed that the BTP would be prioritised and that they will be added to Annex B.
- Confirmed the communication and procedure for gaining access at short notice.

Based on Apian's feedback, the BTP confirmed their support.

Timeline adjustments Stakeholder engagement

Apian conducted further aviation stakeholder engagement between 13th June 2024 - 28th June 2024, asking for feedback on the safety and operational aspects of further adjustments in timelines.

As with the previous timeline extension (see section 6) aviation stakeholders were asked to provide feedback to operate for 6 months, with a tentative start date between Sept and Dec 2024.

4 stakeholders responded to the request. The following provides a summary of responses from those aviation stakeholders on the timeline adjustments proposed. Full feedback can be found in [Appendix C](#)

- **Emergency service operators.** The BTP confirmed their support for the trial.
- **Military operations** The military confirmed that there were no further comments or issues from an MOD point of view with the timeline adjustments.
- **ANSP/Aerodromes** NATS and London Heliport confirmed that the adjustment in timelines did not change their feedback.
- **Other operators** No further feedback was received

Apian's response

Apian thanks stakeholders for their feedback and reviewing the proposed changes. As all responses were supportive and no concerns were raised. No further adjustments were made to the proposal by Apian.

Summary table of communication

	Extended timeline engagement		
Organisation	Emails received		Status
	Email 6 13th June 2024	Email 7 24th June 2024	
Airprox Board			No Response
ARPAS			No Response
Bristow			No response
British Helicopters Association			No response
British Transport Police		N/A	Support
Drone Major group			No Response
Helicopter Club of Great Britain			No Response
Kent and Surrey Air Ambulance			No Response
London Air Ambulance (LAA)			No Response
London Fire Brigade			No Response
London Heliport		N/A	Support
London Metropolitan Police			No Response
Port of London			No Response
Maritime Coastguard Agency			No Response
MoD		N/A	Support

NATS			Support
National Grid			No Response
Network Rail			No Response
NPAS			No Response

Appendix A: Email and responses for first and second engagement periods

- Emails sent

Email 1:

Dear Stakeholder,

We have identified you as a key aviation stakeholder for our proposed temporary airspace change request ([ACP-2023-061](#)) which is requesting airspace to conduct Beyond Visual Line of Sight Operations (BVLOS) Uncrewed Aircraft System (UAS) flights between Guy's and St Thomas' Hospitals in London within a Temporary Reserved Area (TRA).

Attached are slides that will provide you with a detailed summary of our proposed TRA for you to review. Our targeted stakeholder engagement period will take place between 6th October 2023 and 17th November 2023. We welcome any feedback, comments and suggestions relating to the safety and operational aspects of this proposal.

We kindly ask that responses are submitted directly to Apian by 17th November using the feedback form attached via email to london.airspace@apian.aero. Please clearly indicate in your response whether you support, oppose, or neither support nor oppose the proposal. All comments received regarding this proposal will be taken into consideration before a final design is submitted to the CAA.

Thank you

Email 2:

Dear Stakeholder,

I am writing to kindly remind you of the upcoming deadline for responding to our [Stakeholder Engagement ACP-2023-061 request](#). Your feedback is important to us and we would greatly appreciate your input.

As a reminder, the deadline to submit your response is **November 17th**. Please submit your response by this date to ensure that your feedback is considered.

We kindly ask that responses are submitted directly to Apian using the feedback form attached via email to london.airspace@apian.aero. Please clearly indicate in your response whether you support, oppose, or neither support nor oppose the proposal. All comments received regarding this proposal will be taken into consideration before a final design is submitted to the CAA.

Thank you for your time and consideration. We look forward to hearing from you soon.

Email 3:

Please see the attached document that describes the procedures for access to our proposed London TRA for emergency services and military on short-notice operations.

We kindly ask that these not be forwarded or shared at this time while we receive feedback from you and others who may require access. This will form part of our formal submission to the CAA.

If you have any questions/comments/suggestions on the proposed procedures or the TRA please contact us. Our aim is to ensure the TRA will not impact your operations, and we would like to work with you throughout the trial to monitor the effectiveness of the entry procedures and identify whether changes should be made.

We hope that, with these procedures in place, you are comfortable supporting our ACP.

Kind regards

Email 4:

Dear Stakeholder,

As you may recall, we contacted you in October 2023 after identifying you as a key aviation stakeholder, to ask for your feedback, comments, and suggestions relating to the safety and operational aspects of our proposed temporary airspace change request (ACP-2023-061). We are very grateful to all of you who responded to our request, and details of this proposal can be found [here](#) if you require further information.

We are contacting you now to update you on some changes relating to our proposed operations, and to offer a period of time (2nd - 16th January 2024) for you to inform us of any impact these changes may have to your operations. These changes are detailed in the attached briefing pack.

We kindly ask that responses are submitted directly to Apian by 16th January via email to london.airspace@apian.aero. Please clearly indicate in your response whether you support, oppose, or neither support nor oppose the proposal. All comments received regarding this proposal will be taken into consideration before a final design is submitted to the CAA. If you have provided feedback previously and this remains unchanged, you do not need to contact us.

Thank you

Email 5:

Dear Stakeholder,

I am writing to kindly remind you of the upcoming deadline for responding to our [Stakeholder Engagement ACP-2023-061 request](#). Your feedback is important to us and we would greatly appreciate your input.

We kindly ask that responses are submitted directly to Apian by **16th January** via email to london.airspace@apian.aero. Please clearly indicate in your response whether you support, oppose, or neither support nor oppose the proposal. All comments received regarding this proposal will be taken into consideration before a final design is submitted to the CAA. If you have provided feedback previously and this remains unchanged, you do not need to contact us.

Thank you for your time and consideration. We look forward to hearing from you soon.

- **Stakeholder responses**
- **Airprox Board**

- Second stakeholder engagement feedback

Name	[REDACTED]
Email	[REDACTED]
Representing	UK Airprox Board
Stakeholder position (please delete as appropriate)	Support
<p>Feedback:</p> <p>I note that the western extent of the proposed TRA abuts the river Thames. It should be noted that helicopter traffic on route H4 of the London Heli Lanes and under Special VFR will be at a <u>maximum</u> of 1500 ft AMSL in this area, with a suggested (but not obligatory) minimum altitude of 1000 ft AMSL. Therefore, there is potential for helicopter traffic to be within 500ft of the maximum altitude of the RPAS operation with very little lateral displacement. Whilst this should not represent a specific safety issue if all procedures are followed, it does reduce the margins for safe separation and will rely on the helicopter pilot both remaining outside the TRA and sighting the RPAS to ensure that safe separation is maintained. [REDACTED]</p> <p>[REDACTED]</p>	

Apian response:



Thank you very much for the feedback you have provided, we appreciate the time you have taken to respond to us. We will review your comments before submitting our application to the CAA.

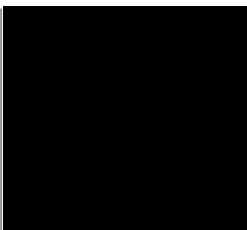
We thought it might be beneficial to share some additional information about our proposed operations, and would welcome a meeting to discuss them with you in more detail to see if you have any further comments/questions.

A TRA has been proposed to ensure the drone operation and crewed aviation are safely separated. Air risk mitigations include this volume of restricted airspace and regulations applicable to crewed aircraft operating in that airspace. The drone will be geofenced within the bounds of the TRA, and an Operational Authorisation from the CAA will be required by the UAS operator before any operations will be conducted. The TRA details will be published via NOTAM to ensure airspace users are aware of the operations. The TRA is not allowed to be entered by other airspace users without authorisation.

We have engaged with a number of stakeholders that may operate in that area to discuss our proposals. We have worked with the organisations who are exempt from the SERA's 500ft rule, to allow us to understand their operations within the area, and to ensure we have appropriate procedures in place to support the short notice access to the TRA that they may require.

We hope this additional information provides you with some useful background. If you would like to discuss any of these in more detail, please do let us know and we would happily support a call.

Kind regards,



- **ARPAS**
 - First stakeholder engagement feedback

Name	
Email	
Representing	ARPAS.UK
Stakeholder position (please delete as appropriate)	Support
Feedback: We note that you will be making provision for other Drone Operators to be able to contact you during periods of Operation, in order to request approvals to operate their Drones in your TDA. On this basis we fully support your proposed application.	

- Second stakeholder engagement feedback

Name	[REDACTED]
Email	[REDACTED]
Representing	ARPAS UK
Stakeholder position (please delete as appropriate)	Support
Feedback: We fully support Apian's ACP 2023-061	

- **Bristow**

- First stakeholder engagement feedback

On Sun, 29 Oct 2023 at 19:28, [REDACTED] wrote:

Hi,
 I'm the [REDACTED] for the Coastguard Search and Rescue unit based at Lydd in Kent, your details were forwarded onto me by one of my colleagues. We occasionally fly into Regent's Park for medical transfers, however I don't believe your proposed TRA up to 400' will be an issue. That said, I'd be grateful if you could add me to your list of interested parties for any future communications.

Many thanks,

[REDACTED]

- **London Air Ambulance (LAA)**

- **First stakeholder engagement feedback**

1. On Mon, 20 Nov 2023 at 09:54, [REDACTED]

Dear [REDACTED]

Many thanks and apologies for not getting back to you earlier.

In principle we are supportive of this TRA trial for your drone operations as it is below 400ft. However, we would wish to see further clarification and confirmation of the following procedures before final agreement by us:

1. Noting that the below applies only when we are tasked and need to land in the TRA.
2. Confirmation of the process of identifying to TC that we are being tasked to land in the TRA – current system does not provide this level of detail.
3. Confirmation that the communication between TC and the drone operator is sufficient robust to ensure that any drone has been landed within 4 minutes of the call originating from HEMS.
4. How do we get confirmation that the drone has landed or not in operation?

I have copied in [REDACTED] Please can you keep him copied in on all communication on this matter.

Best wishes

[REDACTED]

Apian response:

[REDACTED]

Yes of course, and if you want us to arrange a call with NATS joining too, then we can set that up to ensure you are comfortable with the procedure.

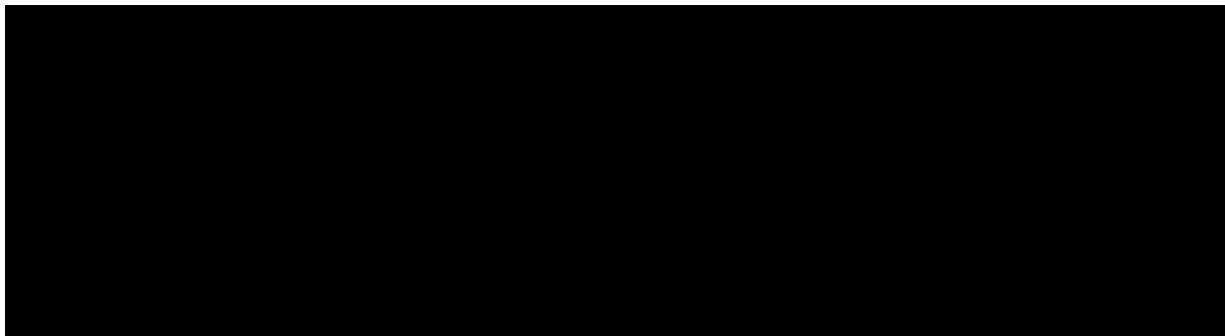
Reference your points below:

1. Noting that the below applies only when we are tasked and need to land in the TRA. **Yes, only for the TRA when activated, which will be NOTAM, mon-fri for 6hrs during daylight hours.**
2. Confirmation of the process of identifying to TC that we are being tasked to land in the TRA – current system does not provide this level of detail. **Thank you for noting this - the TRA will be NOTAM and TC controllers will be briefed on the TRA and procedures.**
3. Confirmation that the communication between TC and the drone operator is sufficient robust to ensure that any drone has been landed within 4 minutes of the call originating from HEMS. **There will be phone number for direct calls to the drone operator from NATS (and vice versa) that will be programmed into their comms system (so they won't be trying to find the number before dialing). This line will be checked at the start of each day. We are requesting to conduct max 10 deliveries over a 6 hour period, each delivery taking a few minutes.**

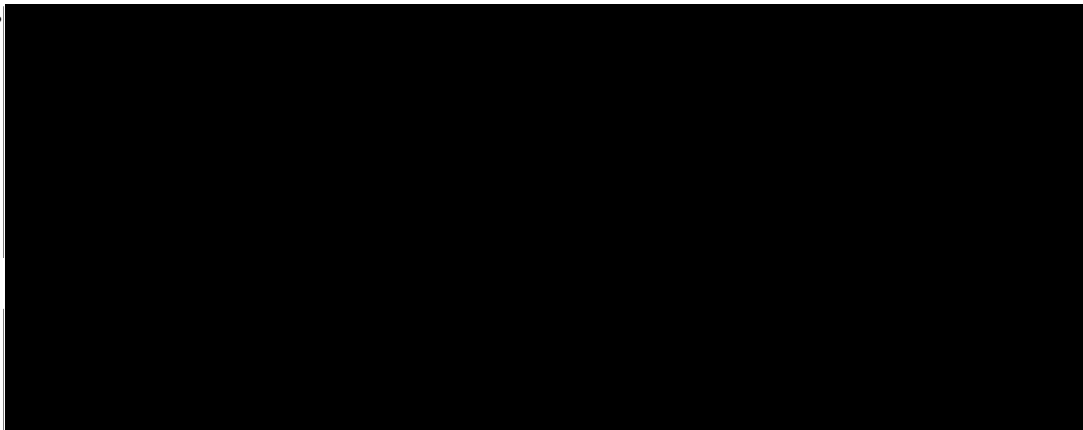
[REDACTED]

[REDACTED]

Fwd: London Air Ambulance summary notes Completed x



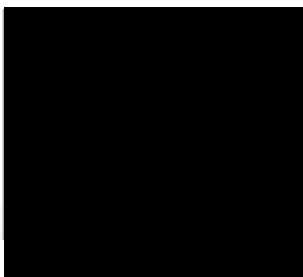
Thank you for taking the time yesterday (13th Dec) to speak to us. I have provided a summary of our conversation which we will share with the CAA, if you have any additional comments, please let me know and I will adjust the summary.



- Discussion areas for TRA
 - Departures from static
 - On heads up to NATS, TRA can be mentioned therefore NATS can contact [redacted]
 - UAS time to take-off, delivery, and return to land will take [redacted]
 - All agreed this was sufficient time
 - Request to provide information for briefing crews
 - Request from when aircraft is airborne
 - Helimed will be on frequency to NATS, on retasking can request access to TRA
 - Additional mitigation
 - If the Helimed is required to land in the TRA, UAS operations will remain paused until they have departed the area
 - [redacted]
- You invited us along to a team briefing in mid-January to update other crew members of our trial
- We agreed to share details on the operations for internal briefing once we have CAA approvals in place

Overall, you confirmed that you find the procedures and mitigations we have put in place suitable to ensure you can access the TRA at quickly. We will ensure you a of how to provide formal feedback throughout the trial, however in the meantime, if you need anything from us, please let us know.

We look forward to seeing you in January.



- Second stakeholder engagement feedback

Apian presented to the London Air Ambulance crews on 17th January 2024 to discuss the trial, operations, and procedures. They verbally confirmed their support for the project.

- **London Fire Brigade**

- First stakeholder engagement feedback

Name	[REDACTED]
Email	[REDACTED]
Representing	London Fire Brigade
Stakeholder position (please delete as appropriate)	Support / Oppose / Neither
<p>Feedback: Having sat on the NESTA Flying High Programme 4 years ago this was touted back then as a future option and I was in favour then, although sceptical about autonomous flying over congested airspace, I was non the less in favour of it happening. Fast forward to the present day and we have seen an exponential rise in user cases for drones and this has now been put into practice. This will also set the bar for others to try so is imperative that we get it right when working as a collective of drone users.</p> <p>Having chatted to [REDACTED] my comments were that as long as we can communicate when operating in or near your flight corridor then we can remain safe and not impede each other's operations. Currently we notify a list of people when at an incident, to include, Swanwick, NPAS, HEMS, DPG Ranger and any localised heliports or airfields of our operating height, and location and potential time on scene. I said to [REDACTED] that if we could contact someone when within your air corridor and an air crossing can be postponed until our operations have ceased then we would call again to notify you so you can commence your flights.</p> <p>The future for most drone use within the emergency services will also go the way of autonomous flights and will be the norm so getting this right will set us on the right pathway.</p>	

Apian shared with London Fire Brigade[Ext] Annex B_ Summary TRA Access for Emergency Services and Military Operations following this email.

- **London Heliport**

- First stakeholder engagement feedback

Name	[REDACTED]
Email	[REDACTED]
Representing	London Heliport
Stakeholder position (please delete as appropriate)	Support / Oppose / Neither
<p>Feedback:</p> <p>Having met with the team at Apian, the Heliport feels that this would not cause any issues for Operations at the Heliport. This is outside of our Air Traffic Zone and outside of our Flight Restriction Zone for the use of drones.</p> <p>The mitigations put in place by Apian to ensure that all airspace users is more than sufficient.</p>	

- Second stakeholder engagement feedback

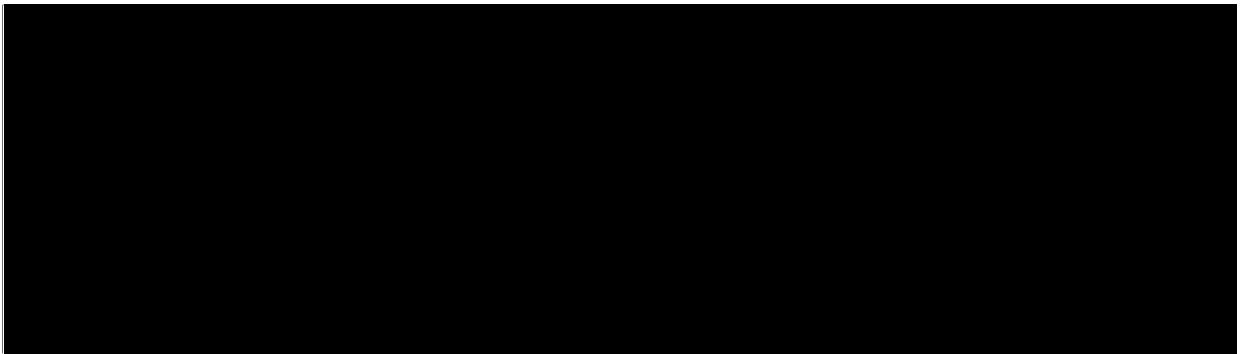
Name	[REDACTED]
Email	[REDACTED]
Representing	The London Heliport
Stakeholder position (please delete as appropriate)	Support / Oppose / Neither
<p>Feedback: No objections to the proposed changes to the original proposal.</p>	

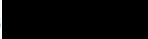
- **London Metropolitan Police**

- First stakeholder engagement feedback



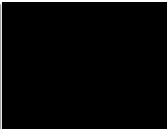
Just wanted to send through a summary of all the conversations and points we have had this week.



Air Support Unit – Drone Operations 

- You confirmed that assuming details are shared and there is a process in place to provide access to the TRA for VLOS operations you had no issues with the TRA
- You confirmed the majority of your work is planned and therefore coordination could easily be agreed in advance

If you feel like there have been areas I have missed. Please do let me know.



- Second stakeholder engagement feedback

Name	[REDACTED]
Email	[REDACTED]
Representing	MPS Air Support Unit Drone Operations
Stakeholder position (please delete as appropriate)	Support
<p>Feedback:</p> <p>The change of operating height from <u>400ft</u> to 450ft doesn't change the feedback previously provided -</p> <ul style="list-style-type: none"> • You confirmed that assuming details are shared and there is a process in place to provide access to the TRA for VLOS operations you had no issues with the TRA • You confirmed the majority of your work is planned and therefore coordination could easily be agreed in advance 	

- **Maritime Coastguard Agency**

- First stakeholder engagement feedback

Wed, 22 Nov 2023, 11:18
☆
↶
⋮

Thank you for sending this through. It looks fine to me.

Its rarely that we come into London (usually Hyde Park) so hopefully we won't need to bother you.

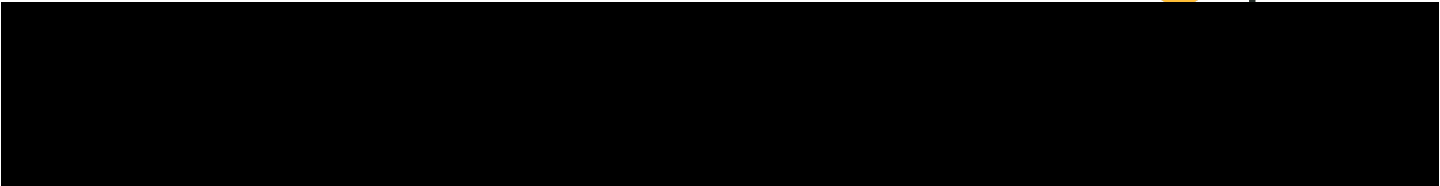
Please let me know when I can release the document to the JRCC- AR.

We are happy to support your ACP

Regards

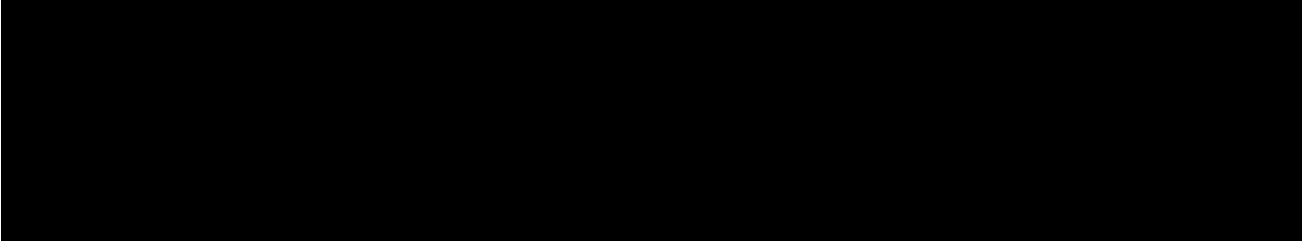
- **MoD**

- First stakeholder engagement feedback



DAATM have coordinated responses from across MOD and can confirm that there will be negligible impact on our operations regarding this proposal.

Please do not hesitate to contact me if you need any further information.



- **NATS**
 - First stakeholder engagement feedback

Name	[REDACTED]
Email	[REDACTED]
Representing	NATS NERL plc
Stakeholder position (please delete as appropriate)	Support / Oppose / Neither
<p>Feedback:</p> <p>APIAN have, via their contract with NATS Services, routinely engaged with NERL with regards to this ACP. Workshops involving all stakeholders have taken part that has resulted in robust draft ATC procedures being agreed that have had initial safety assurance activities completed, with no indication of increased risk being deployed within the NERL operation.</p> <p>The TRA structure and its use will have minimal operational impact to NERL and due to its operating volume will be unlikely to impact other non-priority airspace users in the vicinity. There may be occasions where emergency operations, HEMS and NPAS for example, will be impacted but NERL has already been party to conversations, led by APIAN, that will provide mitigations to reduce the impact the TRA may have in the unlikely event access is required.</p> <p>It is understood that additional support will be required by NERL during the life of the trial with regards to the provision of operational feedback and data capture and presentation in order to facilitate the evidence required to demonstrate the success criteria of the trial. This is acceptable to NERL on the condition this is managed and delivered through its own inter-company agreement with NATS Services.</p> <p>On the assumption that all stakeholders continue their positive and proactive engagement, with established ATC procedures and LoAs being in place ahead of an agreed deployment date, NERL has no reason not to support this ACP.</p>	

- Second stakeholder engagement feedback

Fri, 12 Jan, 08:34 ☆ ↶ ⋮

[Redacted]

NATS NERL plc supports the proposal and has no further comments to make.

[Redacted]

- **National Grid**

- First stakeholder engagement feedback

[Redacted]

☰ Fri, 6 Oct 2023, 12:4:

[Redacted] no objection from NGET helicopter/UAS survey perspective

[Redacted]

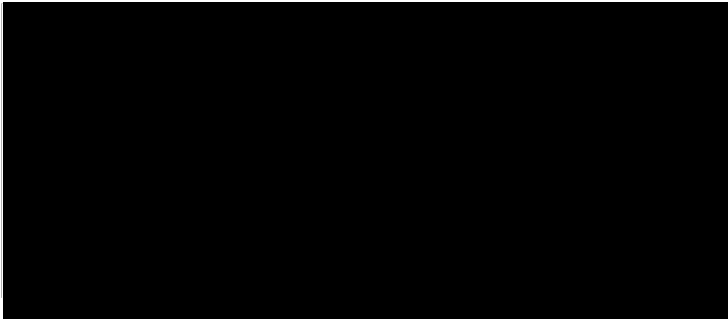
From: London Airspace <london.airspace@apian.aero>

Sent: 06 October 2023 12:28

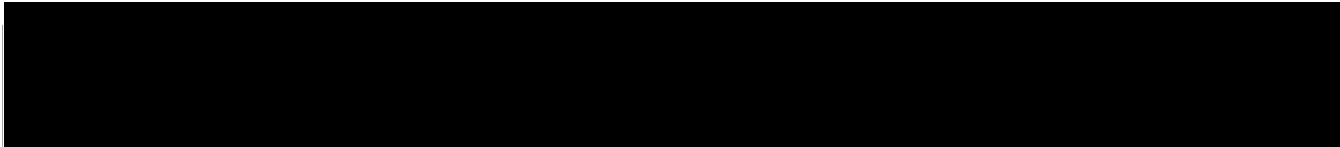
- Second stakeholder engagement feedback



This should not affect NGET operations for the TRA shown between St Thomas and Guy's Hospital.



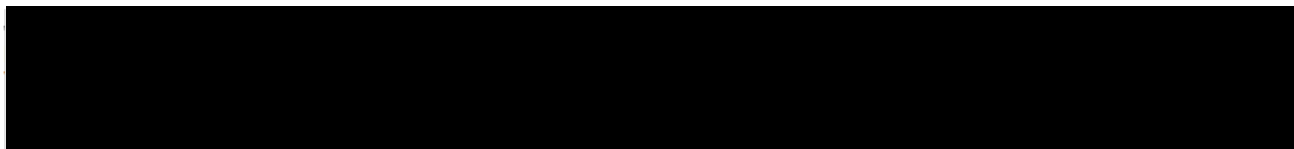
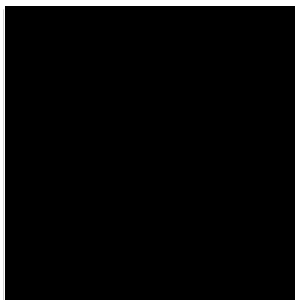
- **Network Rail**
 - First stakeholder engagement feedback



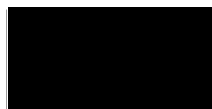
Was great to catch up with you on Wednesday. Just to confirm our conversation regarding the London TRA airspace change process and your feedback for our application:

- You confirmed that your operations for crewed aircraft were not conducted at the heights in London so did not see these as causing any issues to operations
- You confirmed that VLOS activities in this area are minimal, and require the operator to check NOTAMS. Therefore, assuming contact details on how to request access within the TRA are provided on the NOTAM you did not see this impacting your operations.

If you have any further points or have any other questions. Please let me know.



OFFICIAL

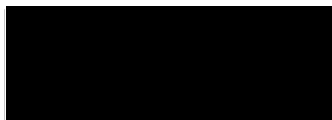


It was great to chat and a fantastic event all round.

Thanks for the email – I'm happy to confirm those details we discussed are correct as per below in your email.

All the best and have a great Christmas/New Year.

Kind regards,



- Second stakeholder engagement feedback

Wed, 3 Jan, 09:00

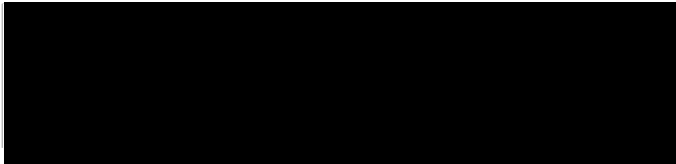


OFFICIAL



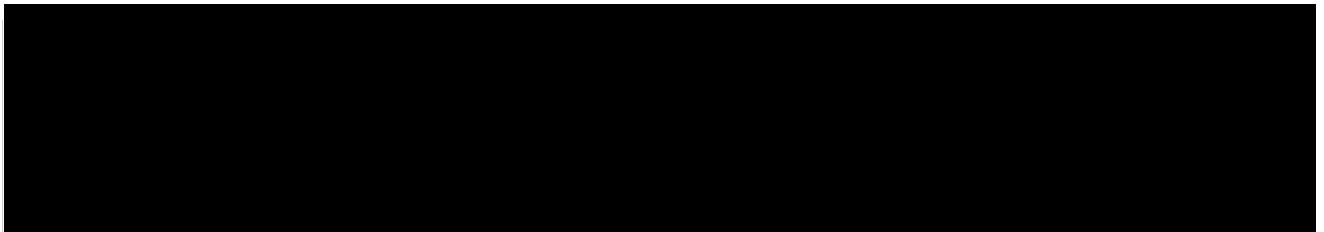
Thank you for the update – I can confirm that Network Rail have no issues with this. We have also made our helicopter contractor (PDG) aware.

Kind regards,



- **NPAS**

- **First stakeholder engagement feedback**



Following on from our phone conversation I just wanted to summarise your points relating to the ACP for our application.

- You stated that whilst you are able to operate at 300ft in this area it is highly unlikely that Police helicopters would do so
- That being said, you believe access requested via NATS is suitable if you or your team need to enter
- Therefore, in summary, you are supportive of our TRA application

Thank you very much for your time.

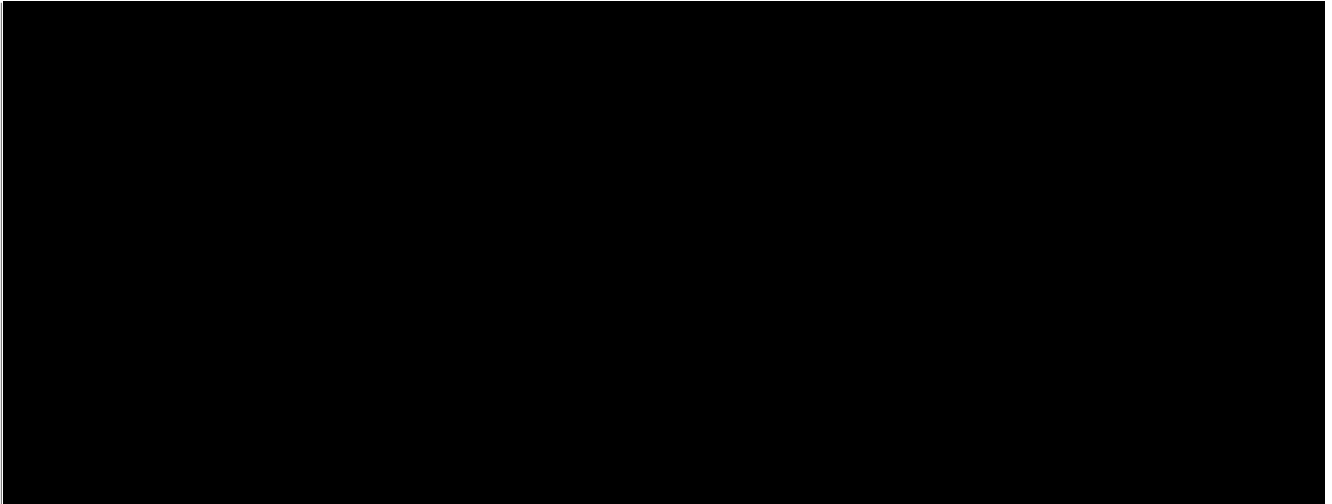
If you have any questions please let us know. We will keep you informed of our progress.



Appendix B: Emails and responses from third stakeholder engagement

- Emails sent

Email 6



Dear Stakeholder,

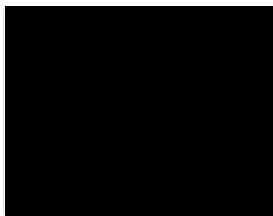
We wanted to inform you of a timeline change to our proposed temporary airspace change request ([ACP-2023-061 London Health Bridge](#)), and ask for your feedback on whether these proposed timelines impact your operations.

Our previous engagement stated that we planned to operate, subject to regulatory approval, between 8th April - 8th October 2024. To ensure all regulatory approvals are obtained in suitable time and in accordance with the [AIC cycles](#), we would like to make the following revision to our operating window.

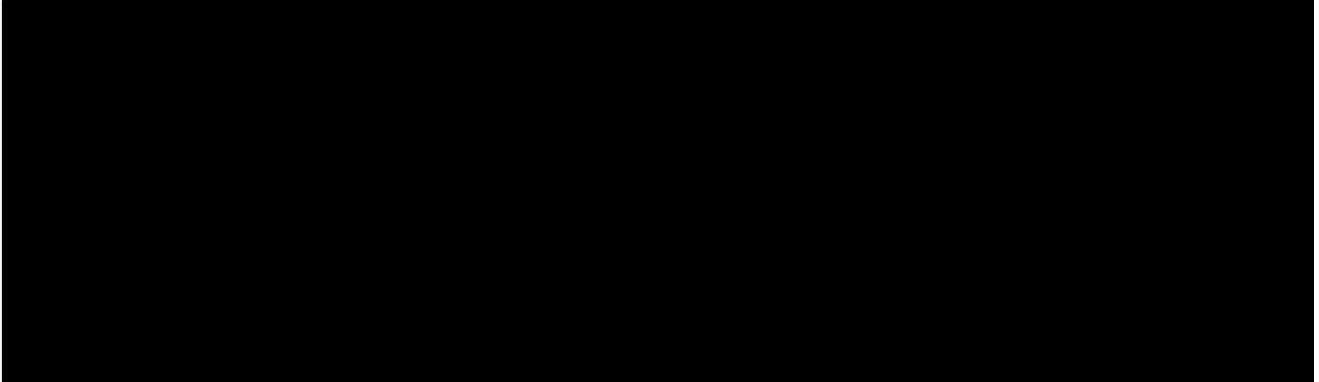
Our revised proposal for your review is to **operate for 6 months, with a tentative start date between May and July**. The exact start date will be confirmed later following regulatory approval.

We kindly ask that you provide any feedback, comments and/or suggestions relating to the safety and operational aspects of these timelines, via email to london.airspace@apian.aero by the **6th March 2024**. All comments received regarding this proposal will be taken into consideration and shared with the CAA.

Kind regards,



Email 7



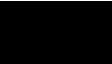
Dear Stakeholder,

I am writing to kindly remind you of the upcoming deadline for responding to our request regarding the revised timelines of our proposed trial [ACP-2023-061 London Health Bridge](#).

As a reminder, our revised proposal for your review is to **operate for 6 months, with a tentative start date between May 2024 and Jul 2024**. The exact start date will be confirmed later following regulatory approval.

We kindly ask that you provide any feedback, comments and/or suggestions relating to the safety and operational aspects, via email to london.airspace@apian.aero by the **6th March 2024**. All comments received regarding this proposal will be taken into consideration before submission to the CAA.

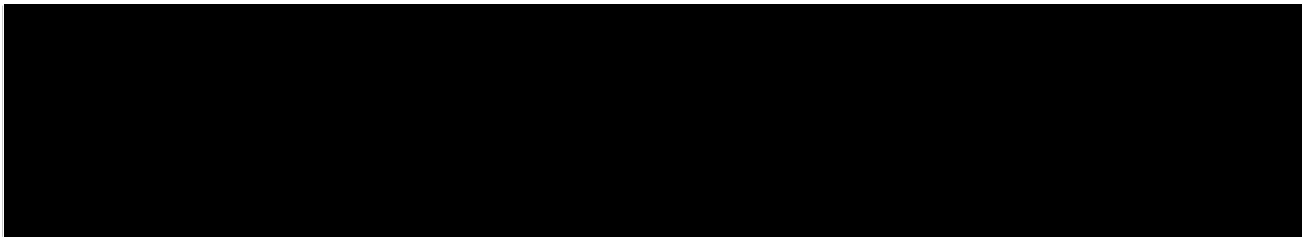
Kind regards,



Aviation Team
airspace@apian.aero



Email 8



Good morning,

Previously we shared with you procedures for emergency services and military requesting short-notice access to our proposed airspace change [ACP-2023-061](#). I have provided an updated version of the document for you.

If you have any questions or would like to talk more about it, please do not hesitate to reach out to me.

ACP-2023-061 is currently being assessed by the CAA and we will keep you informed of any decisions made.

Kind regards,



--
Aviation Team
airspace@apian.aero



 **[Ext] Annex B_ Summary TRA Access for Emergency Services and Military Operations V1.2.pdf**
1894K

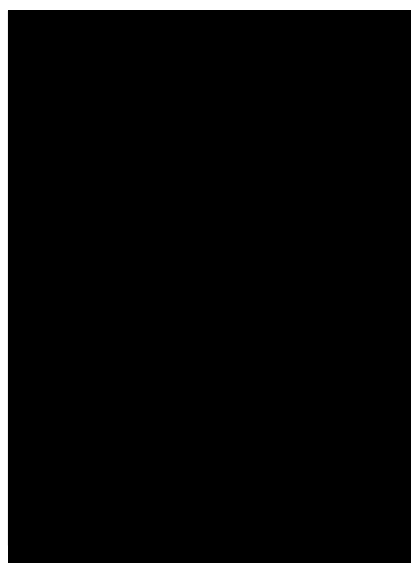
- Stakeholder responses
- **British Helicopter Association**



Thank you for the email.

My response to these ACPs is normally to ask what plans the operator has to allow the Emergency Services into the TDA. I see that you have thought of this and there is a consultation document, but unfortunately it is totally redacted so I cannot tell if the instructions are doable and practical.

Yours



Apian's response



Hi [REDACTED]

Thank you very much for reaching out to us.

We have been working closely with the emergency services (in particular London Air Ambulance) to ensure we have appropriate procedures in place to allow them access to the proposed TRA at short notice. We fully support all the work these organisations do and will prioritise their operations over our activities.

I have attached the unredacted version of the document you mentioned for your review. These documents are redacted on the portal due to the operational detail that is included, and therefore we ask that these are not shared. These documents have been shared (unredacted) with the emergency services and military.

In addition, following regulatory approval, we will be sharing material with our contacts at each of the emergency service organisations to allow them to share details of the trial with their operational staff for information (if they wish).

Annex G of our submission documentation includes a list of stakeholders we have been in communication with. These include NPAS, Maritime Coast Guard Agency, Bristow, London Met Police, London Fire Brigade, London Air Ambulance, and Air Ambulance Kent Surrey Sussex, all these operators have provided their support for the project having reviewed the procedures.

If you have any feedback or would like to discuss our proposal in more detail. Please do not hesitate to contact us.

Kind regards,

[REDACTED]

Aviation Team

airspace@apian.aero



Second email

[Redacted]

Thanks very much for the unredacted version. All looks good and is exactly what I would hope to see. ■

■

- **London Air Ambulance**

[Redacted]

Thank you C [Redacted]

[Redacted]

[Redacted]

LAA has no further feedback on the attached.

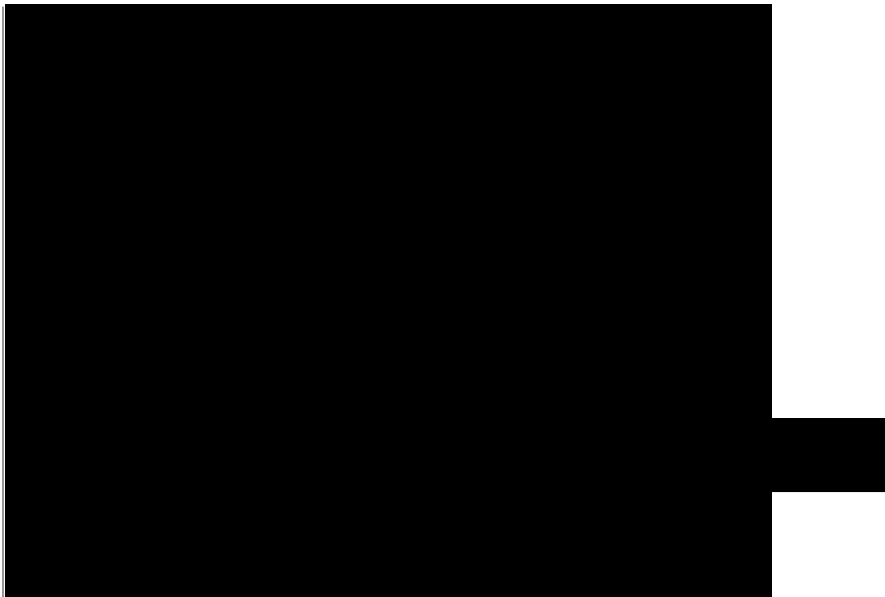
Kind regards

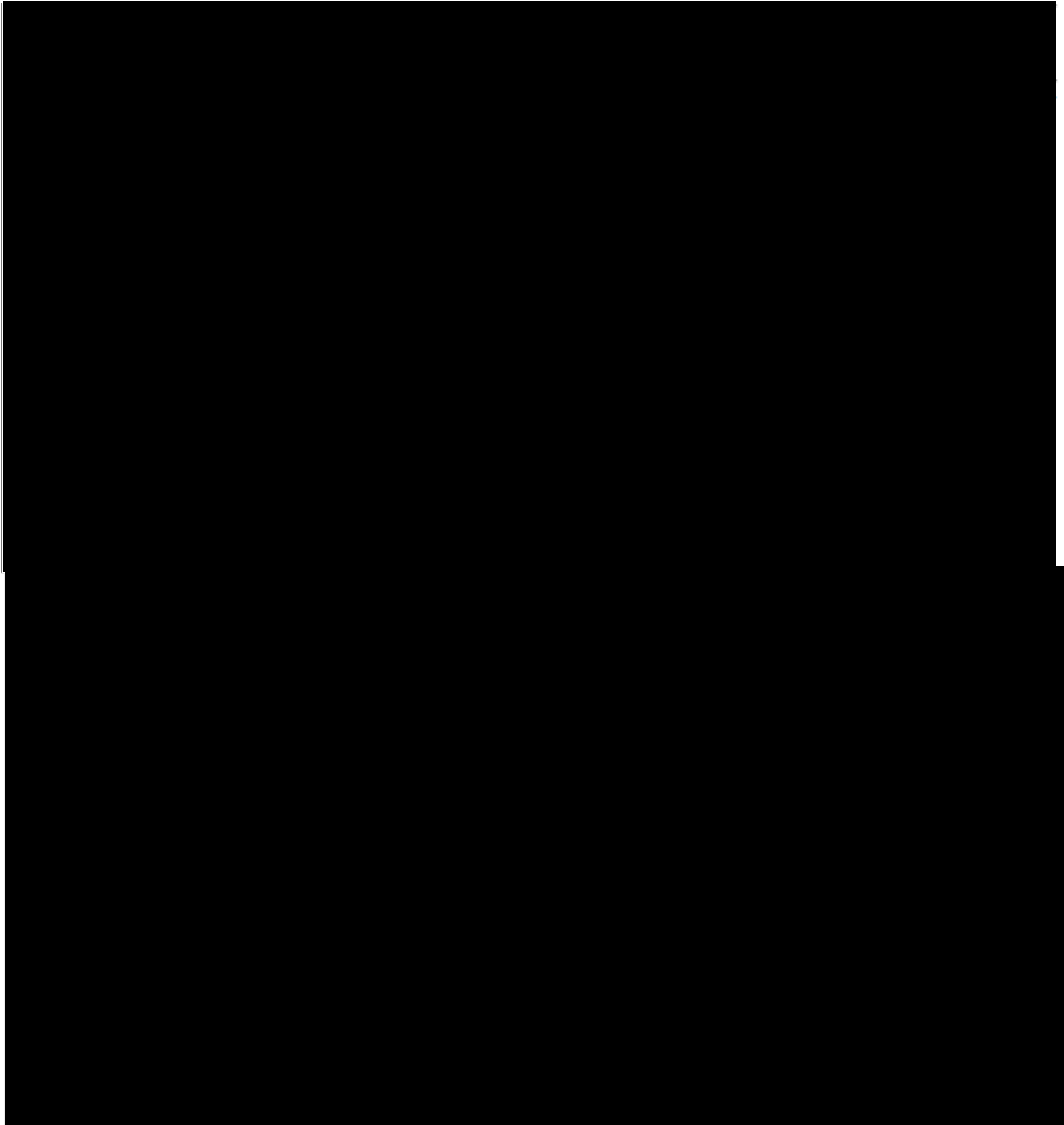
[Redacted]

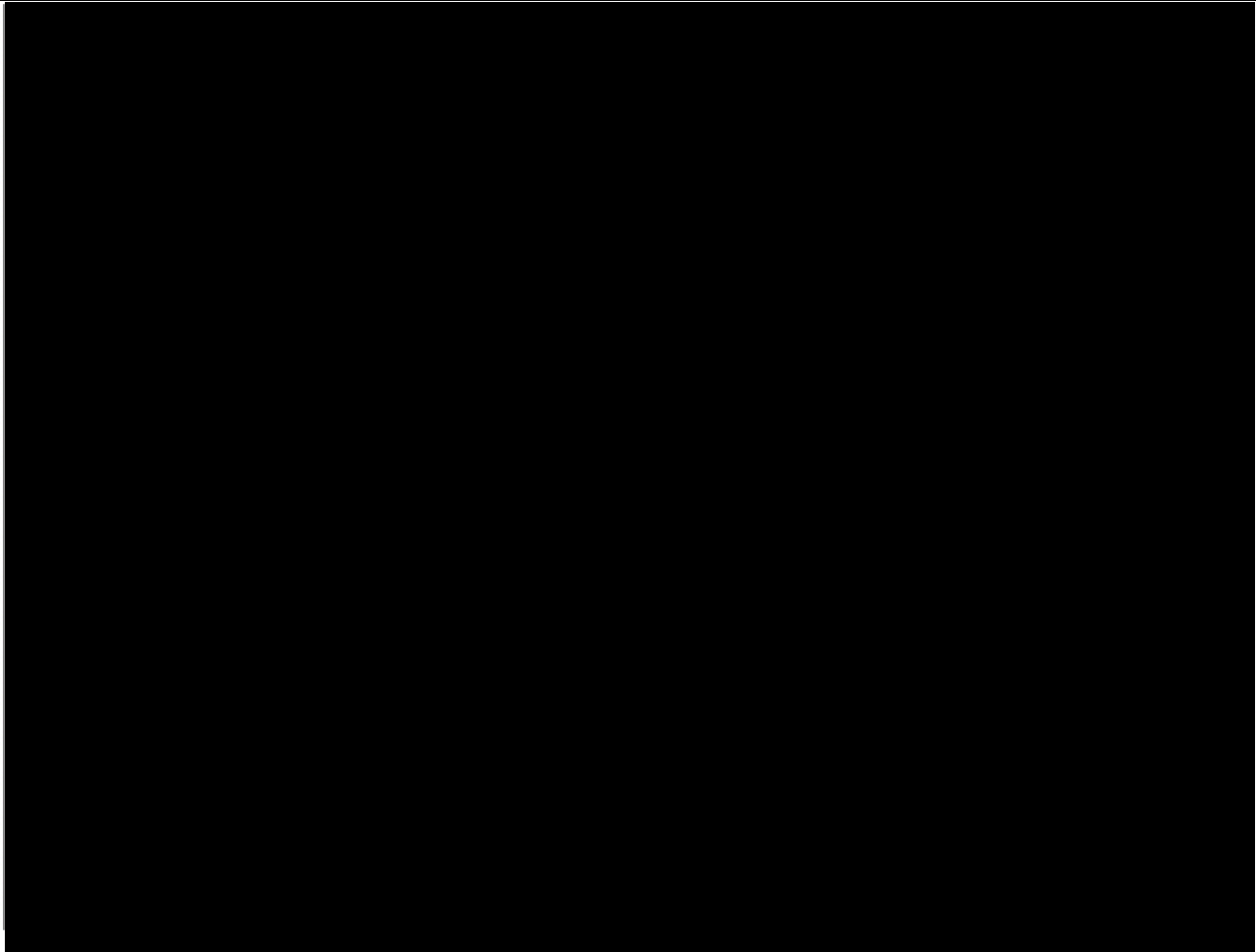
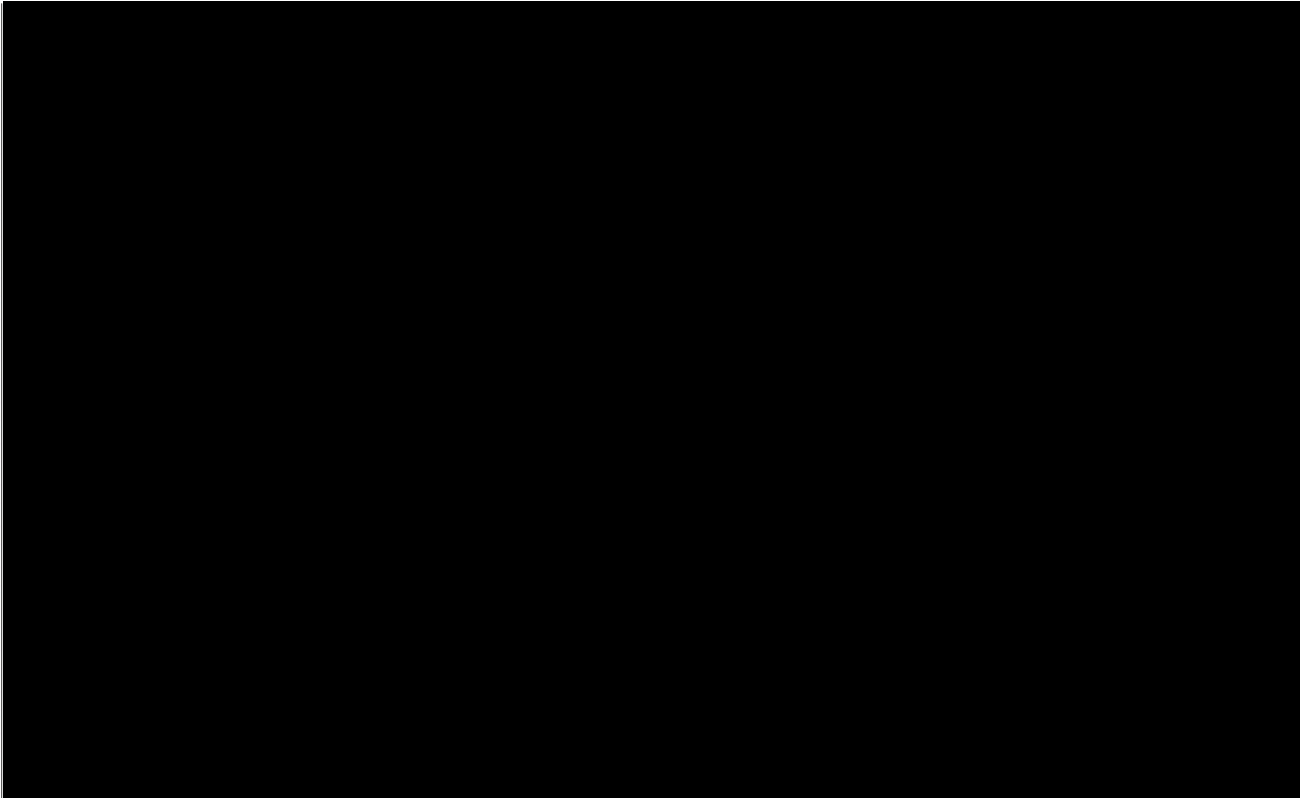
- **London Metropolitan Police**

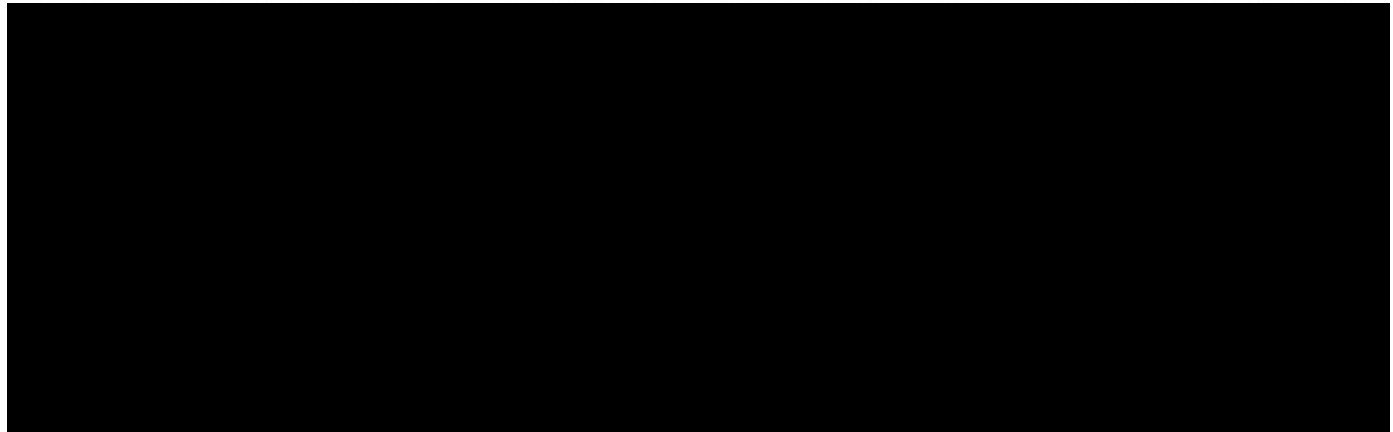
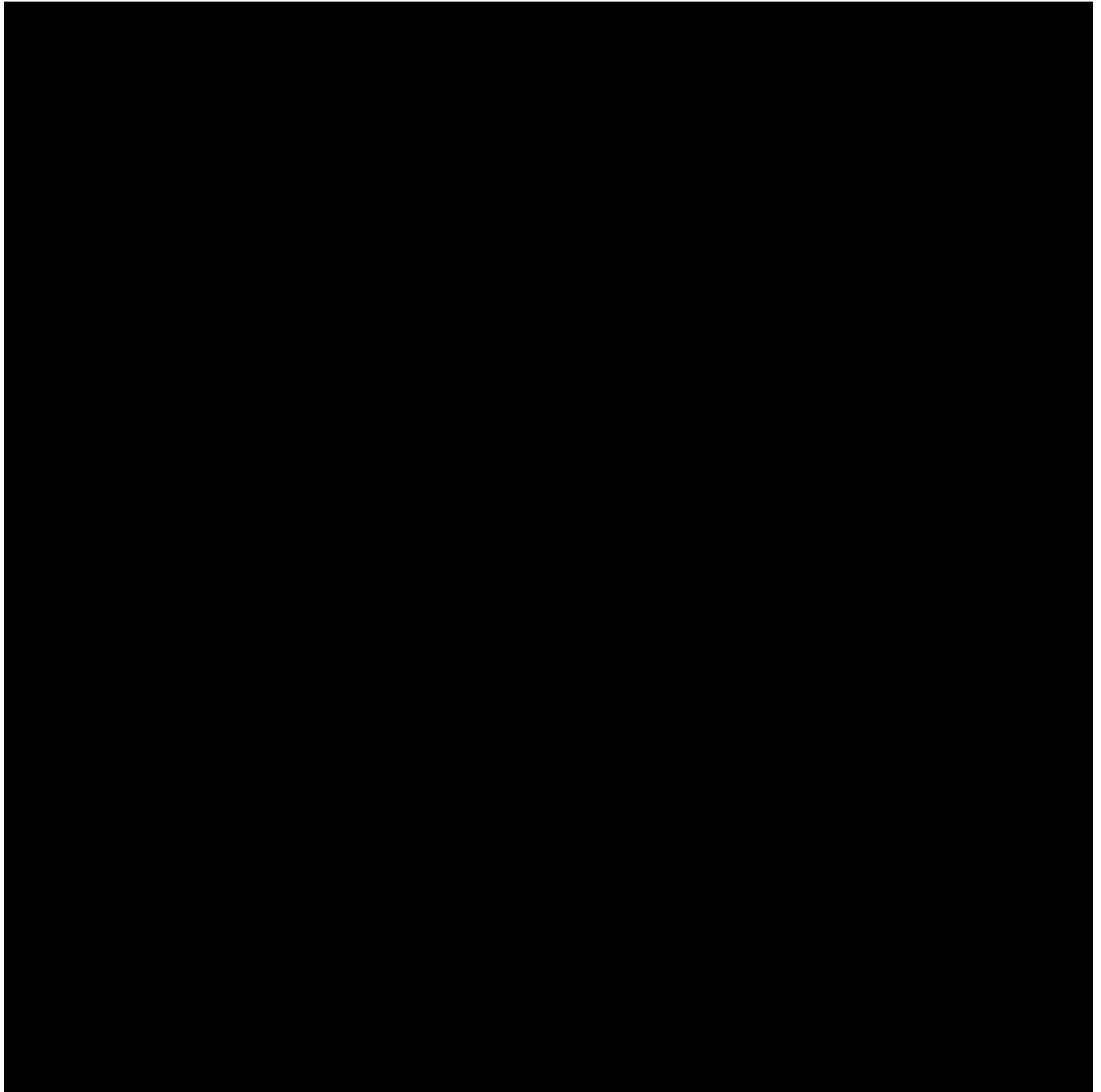


Thank you for the update.











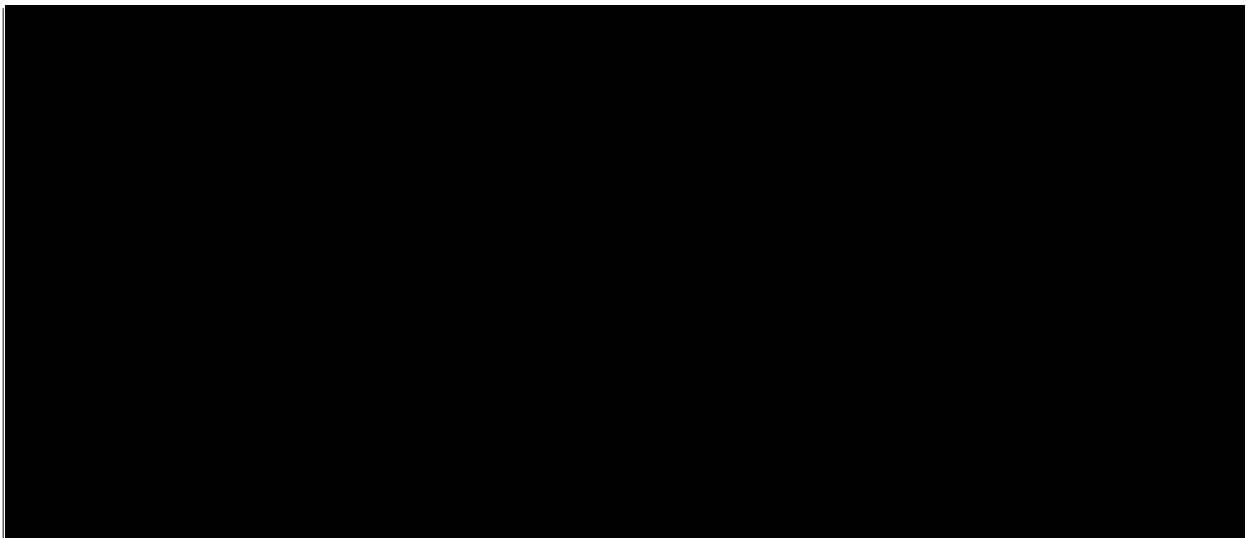
- **Military**



Hope you are well?

No issues from a MOD point of view. Additionally, happy with the updated TRA Access document too.

Regards

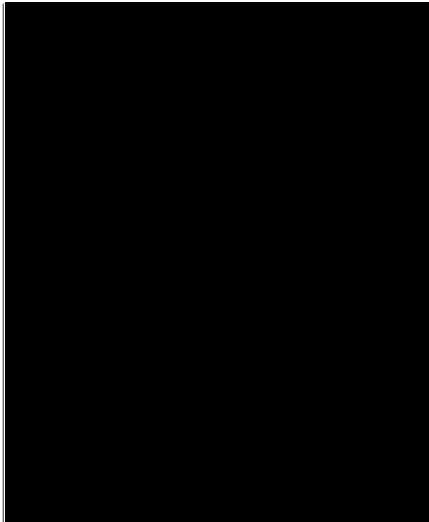


- **NATS**



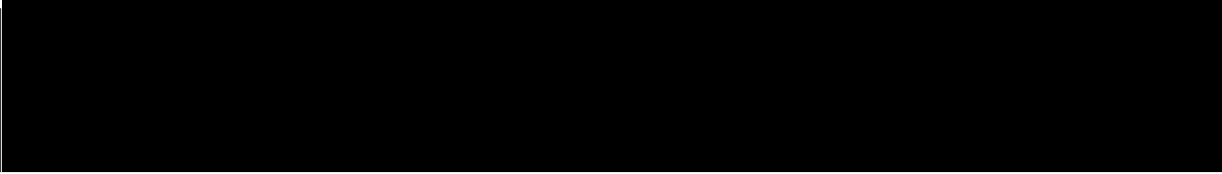
NATS NERL plc has no concerns to raise on the proposed timeline.

Regards



Appendix C: Emails and responses from fourth stakeholder engagement

- British Transport Police



Thank you [REDACTED] we are in the regulatory approval process now so have a case manager who centralises all the approvals for the Airspace Change.

The CAA have recommended that we should get feedback from BTP on our airspace change request to see if it will impact any of your operations. I have included some documents that we have sent to other stakeholders previously for their feedback. We are now looking to start operations in September, and therefore we will be required complete further engagement which will be in June. However, any questions you have or feedback you have before then, please send through to us (I think you know me from this from our previous discussions).

I have included the following for you to review;

- Stakeholder engagement material - this was sent last year so ignore the dates, although allows you to see the ACP request.
- Stakeholder engagement material update - this includes a couple of minor updates (i.e 450ft ceiling for the TRA)



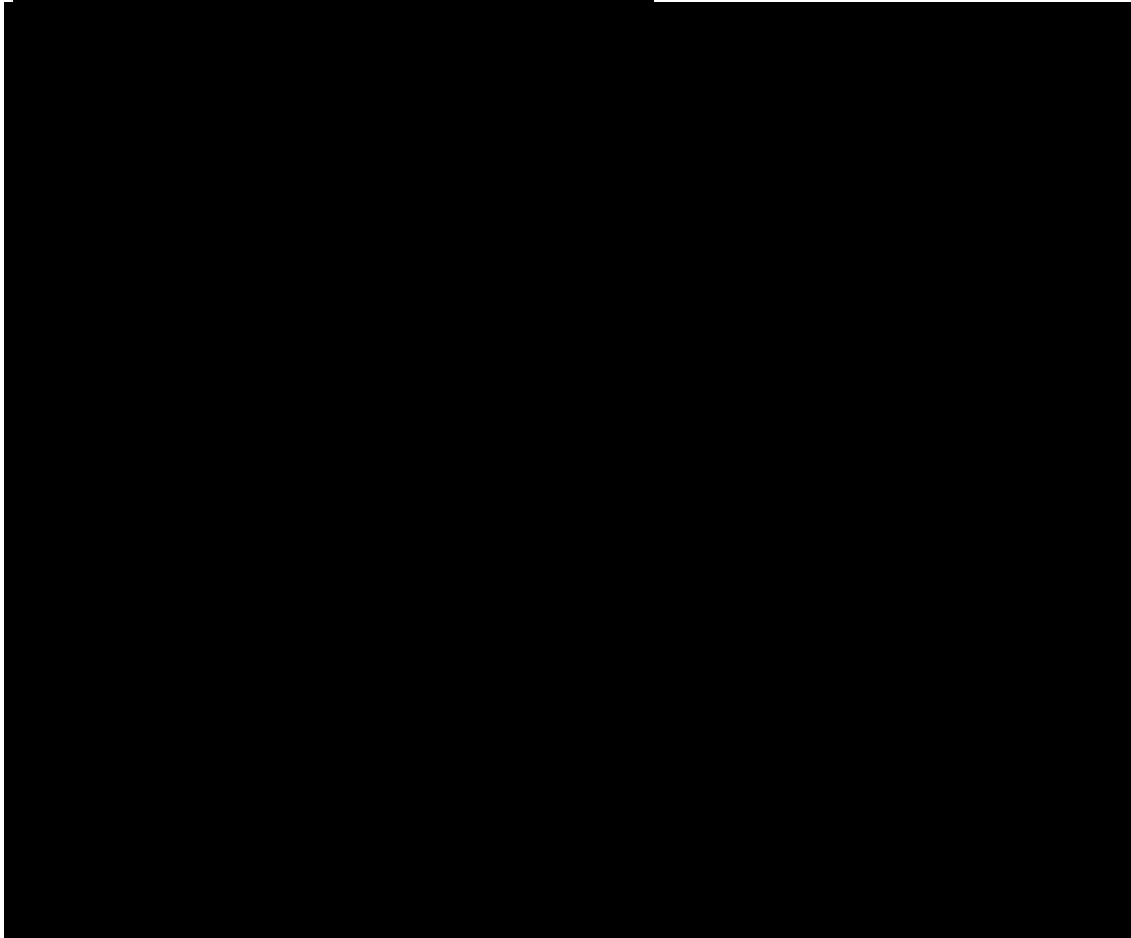
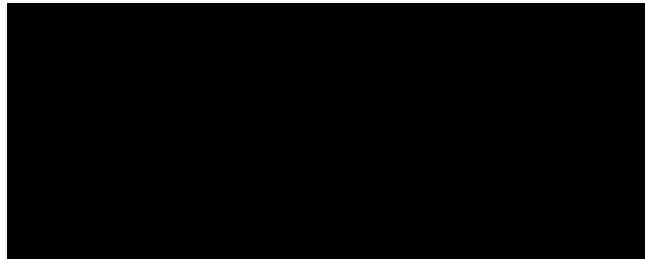
If you have any questions - please let me know. I am on leave next week but can schedule a call when I return.

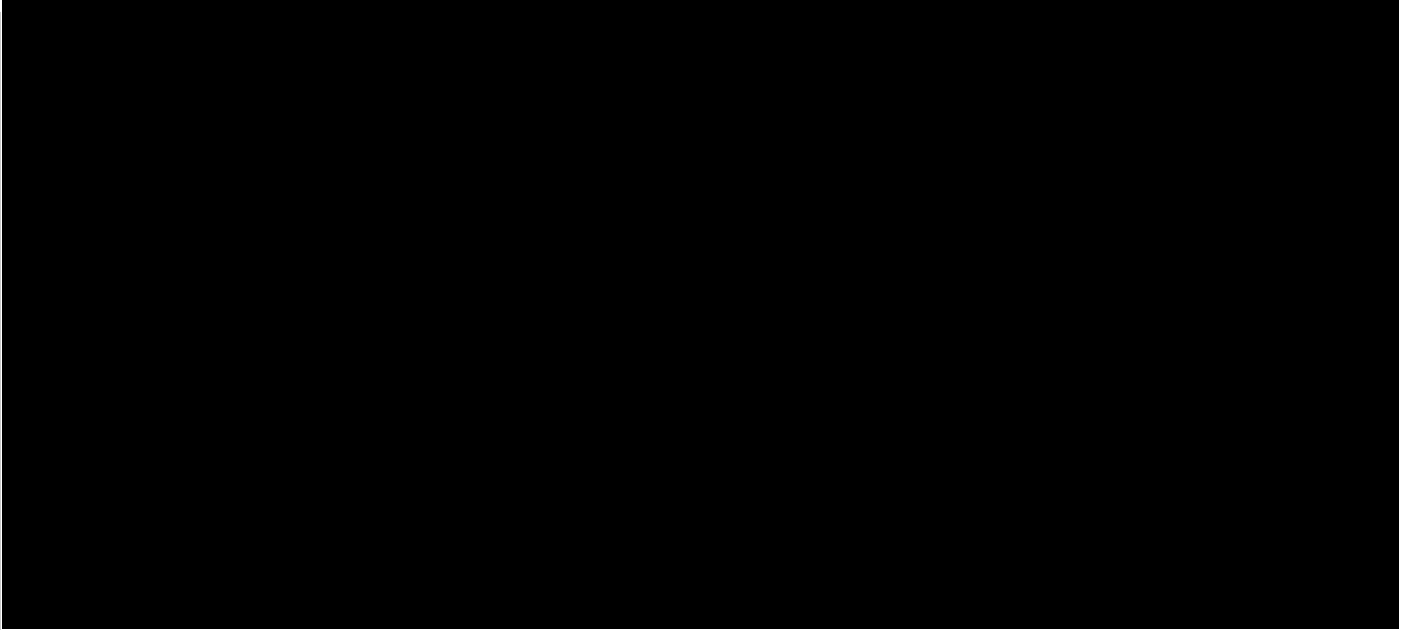
Kind regards,



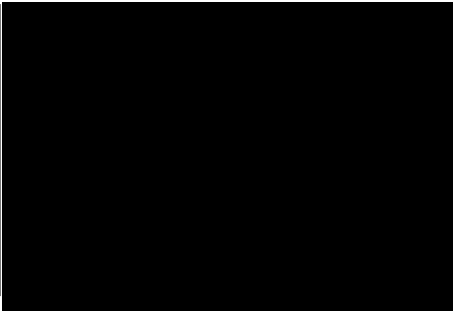


█ has asked me to make contact ref the proposed TRA. I'm sure it won't affect us too much and it's great to see BVLOS progress so I fully support it. However please see some comments below for consideration.

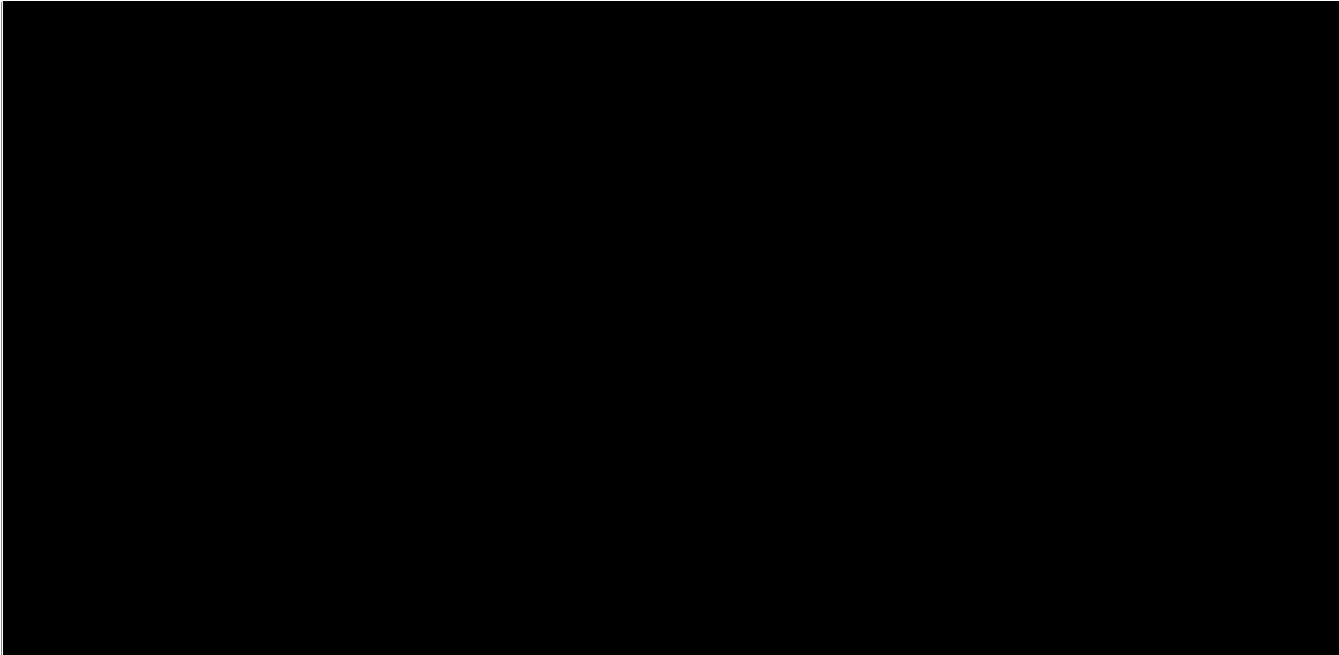




Thanks  much appreciated. Fantastic to see this scheme going ahead.



- **Emails sent**



Dear Stakeholder,

We wanted to inform you of a timeline change to our proposed temporary airspace change request ([ACP-2023-061 London Health Bridge](#)) and ask for your feedback on whether these proposed timelines impact your operations.

Our previous engagement stated that we planned to operate, subject to regulatory approval, for 6 months, with a tentative start date between May and July. Since this will be the first BVLOS operation of its kind in London, obtaining the necessary regulatory approvals requires additional time. To accommodate this, we propose a revision of the operating window.

Our revised proposal for your review is to **operate for 6 months, with a tentative start date between September and December 2024**. The exact start date will be confirmed following regulatory approval.

We kindly ask that you provide any feedback, comments, and/or suggestions relating to the safety and operational aspects of these timelines, via email to london.airspace@apian.aero by the **28th June 2024**. All comments received regarding this proposal will be taken into consideration before submission to the CAA.

Kind regards,

--

Aviation Team
airspace@apian.aero





Dear Stakeholder,

I am writing to kindly remind you of the upcoming deadline for responding to our stakeholder engagement ([ACP-2023-061 London Health Bridge](#)) request regarding the revised timelines of our trial.

As a reminder, our revised proposal for your review is to **operate for 6 months, with a tentative start date between September 2024 and December 2024**. The exact start date will be confirmed following regulatory approval.

We kindly ask that you provide any feedback, comments and/or suggestions relating to the safety and operational aspects, via email to london.airspace@apian.aero by the **28th June 2024**. All comments received regarding this proposal will be taken into consideration before submission to the CAA.

Kind regards,

--
Aviation Team



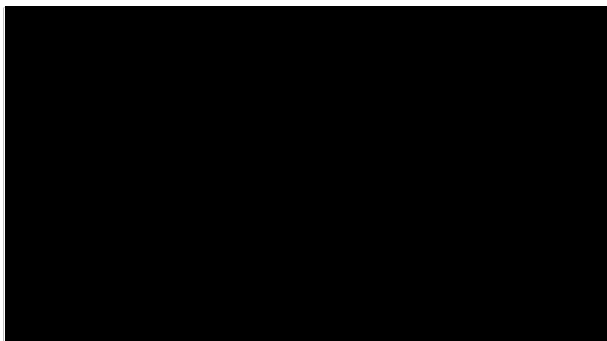
- Stakeholder responses

- BTP

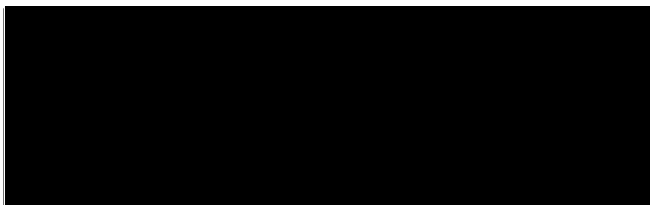


Hello,

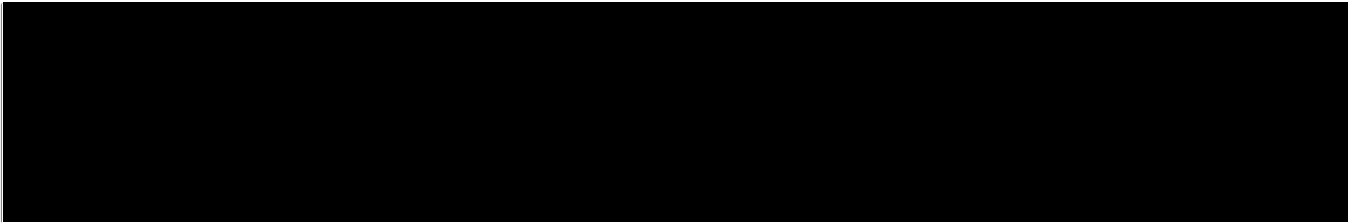
This change will not adversely impact our drone use and I fully support the changes proposed as they of benefit to healthcare and the advancement of drone BVLOS use.



British Transport Police Force Headquarters



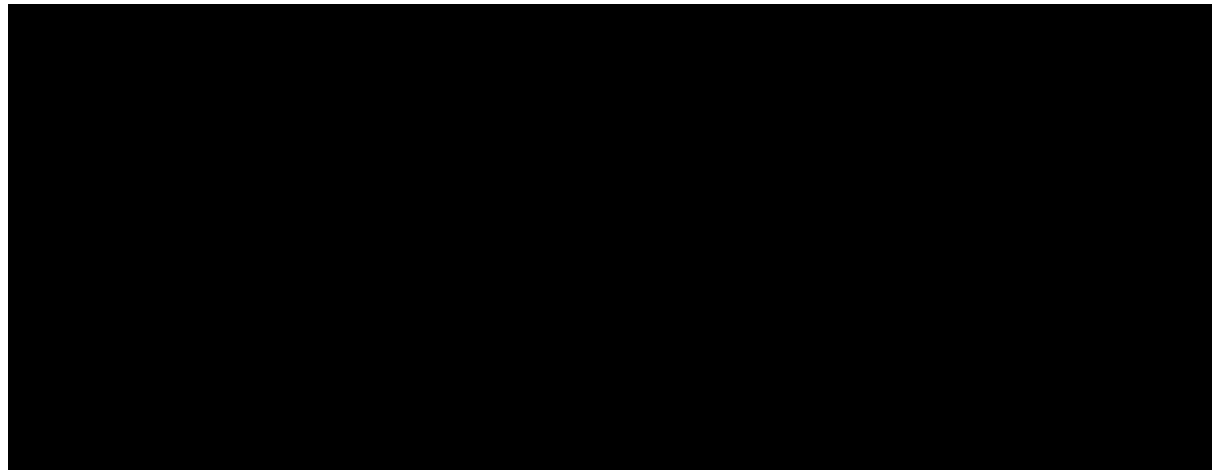
- **London Heliport**



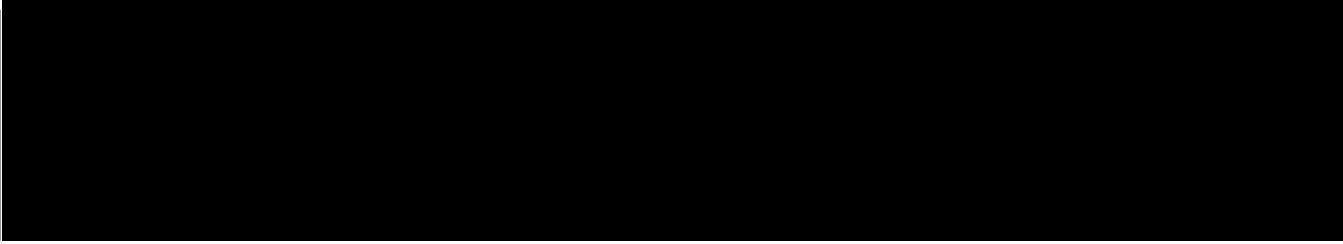
Good Morning,

No issues from the London Heliport for that proposed timeframe change.

Kind Regards



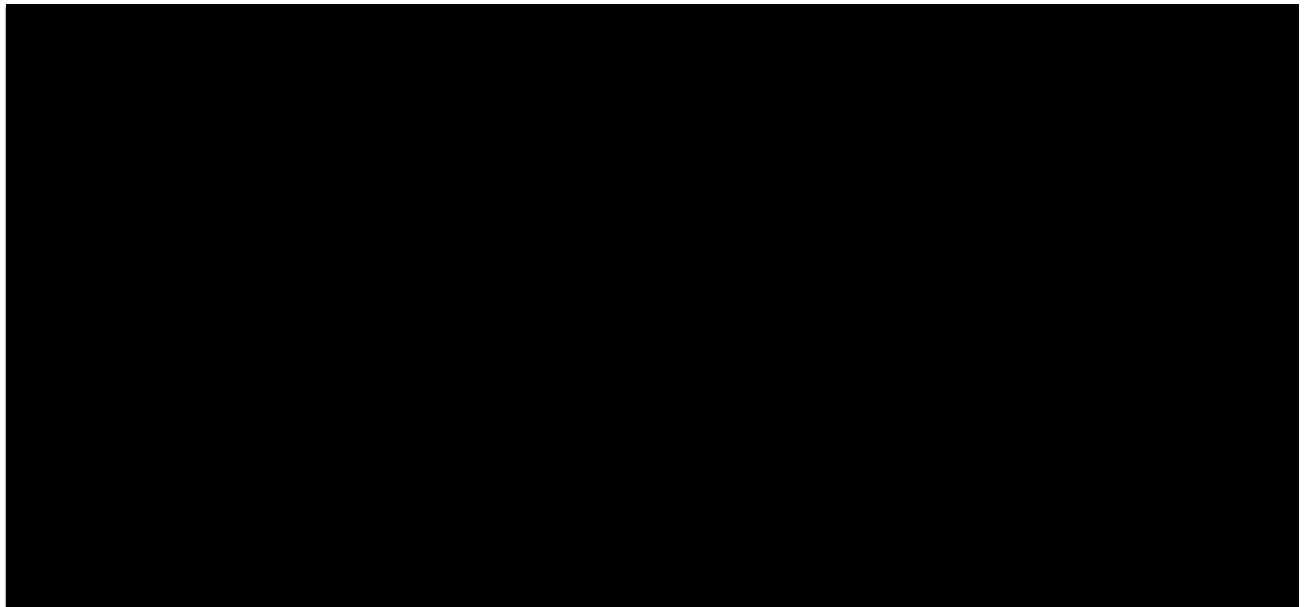
- **Military**



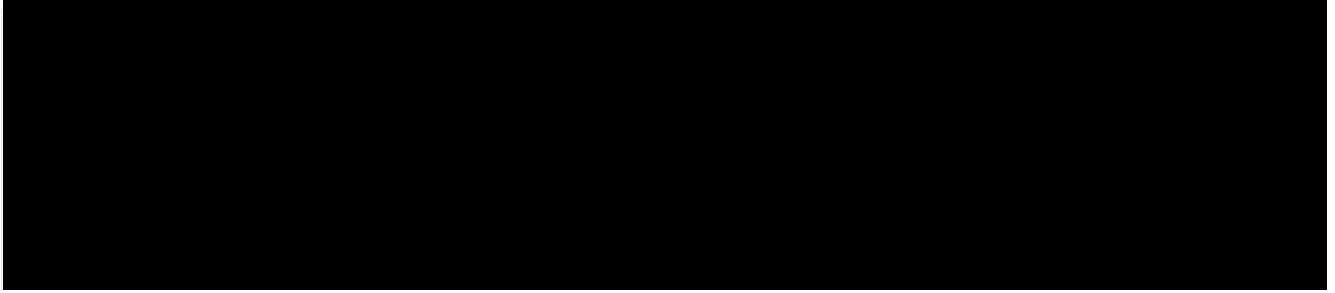
Good Afternoon,

No further comments or issues from an MOD point of view.

Regards



- **NATS**



Hi,

This has been assessed by the NATS NERL plc team as having no impact.

Regards

