

CAA Targeted Engagement Assessment – Temporary Airspace Changes

Title of airspace change proposal	CAELUS Trial C – Ayrshire and Arran
Change sponsor	AGS Airports Ltd
Project reference	ACP-2022-103
Case study commencement date	02.01.2024
Case study report as at	31.07.2024
<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?	YES
	<p>The sponsor has explained that the stakeholders engaged were those that it considered to be directly affected and potentially impacted as well as those would have an interest in the ACP. It developed its stakeholder audience using its experience from previous CAELUS ACPs, consideration of the NATMAC list, advice from the CAA during the Assessment Meeting and from the Prestwick ANSP.</p> <p>In total the sponsor engaged 58 stakeholders broken down into categories as follows:</p> <ul style="list-style-type: none"> Aerodromes in the immediate vicinity - Prestwick GA airfields, clubs and unlicensed sites – GA operators from Prestwick and a number of local aerodromes and flying sites Emergency services – Police, Gama Aviation, Scottish Air Ambulance, Bristow, Offshore Helicopter Services and Babcock Other localised aviation stakeholders – various helicopter landing sites and a local flying group Other non-aviation stakeholders – the three hospitals involved in this ACP GA excluding Emergency Services – NATMAC members representing GA 	

	<p>Other helicopter operators including emergency services – including MCGA, PDG Helicopters and 2Excel National Defence and Safety Critical Organisations – including MOD (DAATM), NATS and UKAB Other suggested stakeholders – stakeholders that were suggested during the engagement</p> <p>A rationale was provided as to why the sponsor chose not to engage with certain NATMAC members.</p>	
2	<p>Has the change sponsor explained the engagement methodology / approach used?</p>	<p>YES</p>
	<p>Stakeholders were initially contacted by email on 24 May 2023, with a stakeholder briefing pack attached. The email explained that the sponsor was committed to minimising impacts on other airspace users and that, depending on any feedback received, it would respond either by email or by setting up a call to discuss (which it did with several stakeholders). Some stakeholders had also been invited to a pre-engagement briefing session on the overall CAELUS project, and answers to questions raised at those sessions were provided for those stakeholders by way of a dropbox link. There is no evidence of reminder emails being sent during the initial round of engagement.</p> <p>After initial feedback, the sponsor made a number of revisions to the proposal and contacted stakeholders again on 30 June, with a revised briefing pack explaining what had changed, seeking any ‘final thoughts and comments’ on the revised proposal.</p> <p>After making some further changes, the sponsor conducted another round of engagement, emailing stakeholders on 18 September explaining the revisions that had been made, including a further updated briefing pack. It explained that the likely flying window had changed to Jan-Feb 2024, but sought feedback on the basis of the proposal taking place anytime up to July 2024. Reminder emails were sent to stakeholders on 27 September.</p> <p>Update 4/7/24 – due to the proposed flying window now being beyond the period the sponsor had initially sought feedback on, a fourth round of engagement was conducted with the same stakeholders. The sponsor contacted stakeholders by email on 7 June 2024, explaining why it was engaging them again and what had changed since the previous engagement. An updated stakeholder briefing document was attached. A reminder email was sent on 21 June to encourage responses.</p>	
3	<p>What materials have been used by the change sponsor during the targeted engagement?</p>	<p>YES</p>
	<p>Each stakeholder was sent a slightly tailored individual email, depending on the level of contact on previous CAELUS ACPs, accompanied by a stakeholder briefing pack. This gave an overview of the CAELUS project, the RPAS to be used, the proposed airspace and flight route (including the ability to download a KML file via a dropbox link), intended periods of activation, a timeline and a stakeholder list.</p>	

	<p>For the subsequent rounds of engagement the sponsor provided an updated briefing pack, including some of the information from the original material with additional explanation of how the proposal had been updated as a result of engagement.</p> <p>The material was largely clear and appropriate for the audience, which consisted of aviation stakeholders many of which were already aware of the CAELUS project from engagement on previous ACPs.</p> <p>Update 4/7/24 – the information shared with stakeholders was an updated version of what was used in previous rounds, with the sponsor clearly stating the three main changes:</p> <ul style="list-style-type: none"> a) the change of dates, with flying now intended to take place for 4 weeks at some point between August and November 2024 b) the ACP now consists only of the Crosshouse to Arran route and no longer enters the Prestwick CTR c) an agreement for Prestwick to provide a crossing service has now been confirmed 	
4	<p>Does the Engagement Summary Report clearly detail the period of engagement? Please include the start/end date and duration of engagement period along with a summary of the change sponsors rationale for pursuing a shorter/longer engagement (where applicable).</p>	PARTIALLY
	<p>The change sponsor has provided the following rationale for its engagement period - <i>Given the stakeholders previous engagement with the CAELUS project, the nature of the airspace and the limited flight and duration it was felt that 6 weeks was a proportionate engagement window.</i></p> <p>The change sponsor has not clearly detailed the period of engagement, however reviewing the evidence shows that stakeholders were contacted on 24 May 2023 requesting a response by 11 June, so that any concerns raised could be addressed by the end of that ‘engagement window’. This means that stakeholders were actually given 18 days to provide feedback, with the remaining time in the engagement window used to address the feedback provided by stakeholders.</p> <p>When an updated design was shared with stakeholders on 30 June they were only given until 5 July to provide feedback (5 days) and for the additional engagement conducted in September stakeholders were given 13 days (18 September to 1 October).</p> <p>As the time period given to stakeholders to provide feedback does not match the rationale provided, the sponsor was asked to explain why it considers that these periods provided adequate time for stakeholders to be able to consider the proposals and provide meaningful</p>	

	<p>feedback. In response, the sponsor has stated that its intention was always to seek the most pressing, initial feedback by half way through the engagement period so that it would be able to re-disseminate updated proposals during the engagement period (rather than stakeholders not seeing any updated proposal until the final submission to the CAA). It has also noted that it continued to engage with stakeholders throughout the engagement window, which is backed up by the evidence, and its view is that stakeholders were not impacted by being asked to respond by 11 June. The sponsor has also stated that it felt that, for the additional engagement conducted in September, the request was much simpler (largely relating to a revised flying period) and therefore a shorter period was acceptable, noting that as before it continued to engage beyond the 1 October date where required.</p> <p>Update 4/7/24 – the change sponsor gave stakeholders 3 weeks (7 to 28 June) to provide feedback in the fourth round of engagement. No rationale was provided for the length of the engagement period.</p>	
5	Was the period of engagement appropriate?	PARTIALLY
	<p>The sponsor has given stakeholders very short engagement periods in the different rounds of engagement for this ACP, and it is disingenuous to suggest that the ‘engagement window’ was 6 weeks when most of that time was for the sponsor to follow up on responses it received from stakeholders that it had only given 18 days to respond.</p> <p>However, the sponsor managed to achieve a good level of feedback, with 38 out of 58 identified stakeholders providing feedback in at least one of the initial or final rounds of engagement. The sponsor engaged extensively with stakeholders who raised concerns, responding by email and proactively arranging discussions via TEAMS to ensure that stakeholder concerns were fully understood and mitigated as far as possible.</p> <p>One stakeholder (the GA Alliance) commented on the length of the engagement period, noting that it gave insufficient time to co-ordinate any GAA consolidated response. The sponsor responded that it had engaged with the GAA’s member organisations directly, indicating that it was not relying on the GAA to act as an intermediary in this case, and the GAA did provide a response to the sponsor.</p> <p>Overall, while the time given to stakeholders to respond was very short the sponsor has managed to elicit a good level of feedback and reach agreements with most stakeholders that raised concerns. Given that, and the scope of this ACP, I am prepared to accept that the short feedback window was sufficient for the sponsor to achieve effective engagement in this case. However, I would recommend that for future ACPs the change sponsor considers whether stakeholders require more time to be able to respond effectively as allowing such short time periods for stakeholders to respond may not be sufficient, or accepted by the CAA, in all cases.</p> <p>Update 4/7/24 - given the nature of the changes to the proposal from previous rounds the engagement period for the fourth round was proportionate (and longer than stakeholders had been given in previous rounds).</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>
	<p>The sponsor has summarised the feedback received within its submission and has provided raw evidence in the form of emails. A sample of this evidence has been reviewed and the sponsor’s summary is accurate. The sponsor has also explained its response to the issues raised, split into two categories – stakeholders who raised points that were incorporated into the final design, and stakeholders who raised feedback that did not impact the final design.</p> <p>The sponsor’s submission summarises responses from 11 stakeholders as feedback that influenced the final design:</p> <p>Prestwick Flight Centre preferred the timing of the trial to be earlier in the year, when their operations are quietest, and raised concerns about the ability of Prestwick to provide a crossing service (DACs/SUACS), which it considered to be essential. The sponsor replied confirming that it was aiming to operate as early in the year as possible, and that the feedback reinforced the need for robust DACs provision.</p> <p>Prestwick Flying Club asked questions about DACs provision, particularly when low cloud is present, access to the airspace, and about how this ACP was contributing to demonstrating safe operation in an integrated environment. The sponsor provided a response explaining the purpose of the trial, an update on the discussions with Prestwick about DACs provision and that, based on this feedback and that from other GA stakeholders, it was considering implementing weather limitations to its operation. This resulted in the implementation of a minimum 1500ft cloudbase in the final proposal.</p> <p>Bute airfield provided comprehensive feedback in relation to the size and shape of the TDA, operating procedures, its upper dimensions and whether further segmentation was possible, with much of the feedback being in the context of the Class G ‘corridor’ between the Glasgow and Prestwick CTR’s and how it is used by GA traffic. It also raised concerns about the EC capabilities of the RPAS and the ability of Prestwick to provide a DACs. In response, the sponsor arranged a call to discuss the feedback which was followed up by a summary of the discussion sent by email. The sponsor explained changes it was making to the design, the operational limitations it was adding and an amendment to the route which addressed the stakeholder’s primary concerns.</p> <p>Scottish Aero Club questioned the upper ceilings of the TDAs and the potential impact on VFR traffic routing North-South West of Prestwick. The sponsor responded, explaining the rationale for the upper ceilings and acknowledging the concerns about VFR traffic. The</p>

sponsor stated that this feedback informed the implementation of a minimum 1500ft cloudbase in the final proposal.

Gama Aviation raised concerns about access to the airspace for helicopters responding to an emergency. The sponsor initiated further discussions which have ultimately led to the development of an LoA to enable access to the airspace as required.

Scottish Air Ambulance / Babcock were unable to attend a call with other emergency service operators, but they reiterated the need for a DACS to provide access to the airspace when required. The sponsor has stated that this feedback informed the need for robust DACS provision.

Bristow SAR raised concerns about access to the airspace and deconfliction from the RPAS given their Prestwick base and the potential need to be airborne quickly after receiving a tasking. Questions were also raised about the lighting on the RPAS and the appropriate protocol if the SAR helicopter needed to land at Ayr hospital if the RPAS was already on the ground there. The sponsor responded to the questions asked and arranged a TEAMS call with Bristow to discuss further. Bristow advised that it had no concerns with the revised proposals in the later engagement rounds.

Police Scotland / Babcock were invited to a TEAMS call but were unable to attend. They advised that the distance from their operating base meant there would be sufficient time to request access when required, and asked questions about whether operations were being planned during hours of darkness, given the time of year, and weather limitations, which the sponsor responded to. The sponsor has stated that this feedback informed the need for robust DACS provision and the intended weather limitation.

ARPAS UK were supportive, but during the final engagement round that support was based on three conditions – the provision of a DACS, the ability for other RPAS users to fly in the TDA when it is active, and that the aircraft involved in the project incorporates ADSB-In and Out. The sponsor provided an update on its discussions with Prestwick about a DACS, advised that it would endeavour to support access for VLOS RPAS operators on a tactical basis but only the CAELUS RPAS could operate BVLOS, and confirmed that the RPAS was capable of both ADSB-In and Out. The sponsor has stated that this feedback informed the need for robust DACS provision.

BALPA raised concerns about the proximity to Prestwick and potential impacts, including to GA traffic routing around Prestwick's airspace, and questioning the benefits of the trial to the NHS. The sponsor arranged a TEAMS call to discuss in more detail. The sponsor has stated that the stakeholder's local knowledge (the BALPA representative was also a local instructor) helped inform revisions to the TDA and operating procedures and, following the second round of engagement, BALPA commented that the proposal now provided a sound basis for the trial.

Mayfield Farm was identified as a local airstrip that would likely be impacted and an individual meeting with the operator of the airstrip was arranged. The stakeholder had concerns about their ability to access the airspace which the sponsor took to Prestwick ATC. An agreement was reached on procedures that would ensure that operations could continue while the trial is in operation, and is captured in the draft Prestwick TOI.

The submission also summarises responses from 7 stakeholders – **AOPA, GA Alliance, BMAA** (including **Strathaven airfield**), **LAA, GAAC, PDG Helicopters** and **Drone Major** - who provided feedback, but it did not influence the final design. The feedback from these stakeholders included questioning the purpose of the trial and how it was supporting integration, the use of TDAs for BVLOS RPAS and access to the airspace, particularly for GA. The sponsor responded to all the concerns raised, including initiating telephone conversations and TEAMS calls in some cases.

The sponsor also received responses from a further 19 stakeholders that it categorised as either supporting the ACP, having no comment to make, or that there was no impact to their operations. These included **Prestwick ATC, NATS** and **DAATM**.

Having reviewed the evidence provided, **DAATM** did initially raise some concerns about potential impacts on 814 Sqn operations from Prestwick, particularly the ability to recover in poor weather. However, these were addressed by the amendments made to the proposal.

Update 1/2/24 – more information was requested from the sponsor about the engagement with **Prestwick ATC**, given their prominence in this ACP, as no explanation or evidence was provided beyond stating that they were supportive. The sponsor has now provided evidence in the form of emails with Prestwick and Prestwick ATC which show that numerous meetings have taken place which are summarised in the email correspondence. Prestwick raised a number of concerns in relation to the original design during a meeting on 13 June 2023, specifically:

- The proximity of the TDA Section C to the ATZ.
- The altitude of 900ft AMSL needed to be considered for circuit and arriving/departing military operations.
- The requirements surrounding the operations of a TSA and increase in controller workload
- A routing further over the water would be preferred (a potential solution was discussed in the meeting and would be reviewed by Skyports with a more accurate version sent).
- PIK would wish to be the Controlling Authority
- Provision of the DACS would be considered by PIK
- Further segmentation of the TDA may be helpful
- Discussion regarding VHF use was held

- It was not felt that there were any potential issues for RT failures or SVFR clearances, especially if weather limitations were included.

This feedback from Prestwick largely resulted in the revised design that was shared with stakeholders, and Prestwick were supportive of the changes made. Discussions have continued in relation to DACS provision, the HAZID and the agreement of an LOA and TOI. One email dated 5 September notes *Possible challenge with sector B3 (TDA top 900') versus VFR departures and arrivals from the South - TDA top 900' owing to UA operating Ground Risk*. The evidence provided does not show a specific closure of this issue, and on asking the sponsor they advised that a response to this issue had not been documented but Prestwick's ongoing involvement and willingness to provide a DACS demonstrated that they were content – this can be checked via the HAZID process. **Update 4/7/24 – this is no longer a concern as this sector no longer forms part of the revised TDA.**

As well as the email evidence, the sponsor has also provided a narrative summarising the discussions with Prestwick to add to the submission document so that it is accessible to all stakeholders.

Update 4/7/24 – the change sponsor received responses from 13 stakeholders in the fourth engagement round (although raw evidence of response from three stakeholders are missing from the submission, and none of the raw evidence has been uploaded to the portal. This can be dealt with by way of a condition). Nearly all were supportive and are summarised below –

Prestwick Flying Club stated that given the inclusion of a SUACS, the removal of the route through the Prestwick CTR and the limited duration, they had no objections.

The sponsor states that **Mayfield Farm** 'Advised that he now owns a drone instead of an aircraft and asked for clarifications on rules for flying it' but the raw evidence is missing from the submission.

Bristow Helicopters suggested that 5-8 September should be avoided due to the International Ayr Show Festival of Flight

Babcock expressed some concerns about the effectiveness of the proposed communication between ATC and the remote pilot, as a result of which the sponsor arranged a call to explain the SUACS and backup communication measures in place. The sponsor has stated that Babcock verbally confirmed they had no objections and promised to send written confirmation of that, but no evidence of that being received had been provided (or received by the sponsor as of 25/7).

MOD DAATM confirmed they had no objections, with separately **814 NAS** advising that they did not have plans to operate in the area at that time and **824 NAS**, on behalf of the Merlin Helicopter Force at RNAS Culdrose, noting concerns about any increase to MAC risk or delays to access, but impact would be minimal as long as access was available in the event of a short notice tasking. The sponsor offered reassurance that access would be available through a SUACS, on the basis of which 824 NAS confirmed that it had no objection.

NATS Glasgow, Bute airfield, Gama Aviation, the NHS, the BHA, BALPA, UKFSC and NERL responded but had no concerns about the proposal (no raw evidence provided from BHA or BALPA).

7	Is the change sponsor's response to the issues raised appropriate/adequate?	YES
	<p>The sponsor has taken feedback on board and made multiple changes to the design as a result, with both the second and third engagement rounds presenting updated designs based on feedback received from stakeholders. These included changes to the intended routing, the dimensions, segmentation and ceiling of the airspace, introducing weather limitations and confirmation of DACS provision, while a LOI has been developed with Prestwick airport, which is currently in draft form. These changes have largely mitigated the concerns raised by stakeholders.</p> <p>Update 4/7/24 – no further changes to the design or related procedures were required as a result of the fourth round of feedback. The sponsor has stated that it will not operate between 5-8 September to avoid the air show advised by Bristow.</p>	
8	Has the change sponsor set out how they will collate, monitor, and report to the CAA on the level and content of the complaints?	YES
	Yes, the change sponsor has explained that it will continue to use the same dedicated email address that it has used for engagement on this ACP to date and this will be detailed in the AIC and in its communications to stakeholders informing them of the CAA's decision on the ACP. It has also stated that all complaints will be addressed and recorded accordingly, and reported to the CAA.	
9	Is the proposal likely to affect traffic operating below 7000ft over an inhabited area? If yes, has the change sponsor provided the brief impact analysis to explain the likely impacts and explained how they will inform relevant community stakeholders?	YES
	The sponsor has stated within its submission document that there will be no change to established aircraft routes below 7000ft and no change to existing promulgated airspace including holds or VFR reporting points. The UAS itself is virtually undetectable at cruising altitude, and take off and landing points are located away from residential areas.	
10	Taking the above considerations into account, does the SME recommend that this proposal has met the engagement requirements of the Temporary Airspace Change process?	YES
	Despite the short periods given to stakeholders for feedback, the sponsor has achieved effective engagement and made changes to its proposal in response to feedback to reduce the impact on stakeholders. A number of airspace users, including GA, HEMS operators and the military, raised concerns about access to the airspace which the sponsor has mitigated by confirming that a crossing service will be provided.	
11	Are there any Condition(s) which the change sponsor must fulfil before activation (if approved)? If yes, please list them.	YES
	<ul style="list-style-type: none"> • <i>The LOAs/TOIs mentioned in the final submission are produced. Evidence can be provided that these documents are in draft. If the final Decision is to approve the ACP, finalised and signed copies of these agreements will be required before the CAA approves activations of the TDAs.</i> • <i>The change sponsor should inform the stakeholders of the decision (when published), likely impacts and what will happen next.</i> 	

	<ul style="list-style-type: none"> • <i>The sponsor is required to collate, monitor, and report to the CAA on the level and contents of feedback received during the period of the TDA. The CAA expect reporting on the level and contents of any stakeholder feedback received on a fortnightly basis throughout the duration of the TDA (this should include nil returns). The sponsor should send these reports to the assigned Account Manager/Case Officer.</i> • <i>The change sponsor is required to produce a revised version of its 20240703 Raw Engagement Data document, to include the 'missing' evidence from Mayfield Farm, the BHA and BALPA, and upload it to the portal</i> 		
Targeted Engagement Assessment sign-off			
	Name	Signature	Date
Assessment completed by Airspace Regulator (Engagement and Consultation)	██████████	████████████████████	31.7.24