

## CAA Targeted Engagement Assessment – Temporary Airspace Changes

Title of airspace change proposal	London Healthcare Bridge – Guy's and St Thomas' NHS Foundation Trust (GSTT) – Trial Temporary Reserved Area (TRA)
Change sponsor	Apian Ltd
Project reference	ACP-2023-061
Case study report as at	30 <sup>th</sup> July 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"> <li>• YES</li> <li>• NO</li> <li>• PARTIALLY</li> <li>• N/A</li> </ul> <p>To aid the SARG Lead it may be useful that each question is also highlighted accordingly to illustrate what is:</p> <p>resolved <span style="background-color: #90EE90;">YES</span> not resolved <span style="background-color: #FFD700;">PARTIALLY</span> not compliant <span style="background-color: #FF6347;">NO</span></p>	

Targeted Engagement Assessment		
1	Has the change sponsor identified the right audience(s) and provided a rationale for selecting them?	YES
	<p>The change sponsor produced a Stakeholder Engagement Plan (dated 27<sup>th</sup> September 2023), which outlines how relevant aviation stakeholders were identified. The plan summarises the methodology taken by the change sponsor for identifying stakeholders which was primarily based upon discussions with the CAA, a review of the NATMAC list and prior knowledge of relevant stakeholders that the change sponsor had through experience with previous airspace change proposals. When considering the aviation stakeholders for engagement, the change sponsor has used the location and dimensions of the TRA to identify aviation stakeholders which will be either impacted by the TRA or will benefit from being part of the engagement process, due to the proximity of the TRA, nature of operations and scope of the aviation organisation.</p> <p>A full list of stakeholders that the change sponsor engaged with, is contained within a document titled: "Annex G: Summary of Targeted Aviation Stakeholder Feedback-London Health Bridge V1.5." The change sponsor engaged with some NATMAC members, NATS as the relevant air navigation service provider (ANSP), the military and other airspace users that were considered relevant. The British Transport</p>	

Police (BTP) were latterly engaged with, following feedback received from the CAA. A total of 19 stakeholders were engaged with, as categorised below:

**Aerodromes/Airports:** London Heliport.

**NATMAC:** Association of Remotely Piloted Aircraft Systems (ARPAS-UK), MOD-DAATM, British Helicopter Association (BHA), Drone Major, Helicopter Club of Great Britain (HCGB), National Air Traffic Services (NATS), UK Airprox Board (UKAB).

**Other Airspace Users:** Bristow Group, British Transport Police (BTP), Kent and Surrey Air Ambulance, London Air Ambulance (LAA), London Fire Brigade, London Metropolitan Police, Port of London Authority, Maritime and Coastguard Agency (MCA), National Grid, National Police Air Service (NPAS), Network Rail.

The above NATMAC members were considered by the change sponsor to be impacted by the proposal. The Stakeholder Engagement Plan also lists NATMAC members who were not engaged with and provides a rationale for not doing so. The rationale is acceptable, as it was primarily based upon members not operating within close proximity of the proposed TRA and other members having a specific strategic rather than operational purpose.

The change sponsor within the Stakeholder Engagement Plan, also gave the following rationale for their decision regarding which helicopter operators to engage with: *“as the proposed TRA does not impact the H4 Helicopter Route, we won’t be engaging with helicopter operators that use the route. However, the BHA and HCGB have been included in this engagement list to ensure there are no other civilian, non-emergency helicopter flights that could take place in the area of the TRA.”*

In addition to engaging with airspace users, ANSPs and relevant members of the NATMAC list, CAP1616 requires change sponsors to engage with airports. The proposed temporary reserved area (TRA) is located within the London City Control Zone, which is classified as Class D airspace and operates from surface to 2,500 feet AMSL. The TRA is also within close proximity of Heathrow’s Control Zone which has the same vertical dimensions. There does not appear to be a rationale as to why these airports haven’t been engaged with, although the assumption for non-engagement is both airports are not physically situated within the proposed TRA. However, the change sponsor acknowledges within the document titled: “London Health Bridge Trial Submission Pack” (version 2, dated 2<sup>nd</sup> July 2024) that NATS provides ATC services within these control zones and as the relevant ANSP, NATS has been engaged with. The change sponsor confirms within the Trial Submission Pack that the targeted aviation stakeholders (including NATS) will receive links to the Aeronautical Information Circular (AIC) and activation and de-activation of the TRA by NOTAM will be notified by the change sponsor at least 24 hours in advance of operations.

The BTP was not formally engaged with by the change sponsor, prior to the fourth period of engagement that is outlined in Section 4. Following discussions with the CAA, the BTP was contacted by the change sponsor and information on the trial and operations that had previously been shared with stakeholders, was shared with the BTP. Feedback was received and this is summarised under question 7.



2	Has the change sponsor explained the engagement methodology / approach used?	YES
	<p>The strategy for stakeholder engagement is outlined in the Stakeholder Engagement Plan. It explains that engagement for this ACP will be separated into two areas: targeted aviation stakeholder engagement and public engagement. A separate public engagement plan has been produced titled: "Annex F: Community Engagement Plan-London Heath Bridge V1.4."</p> <p><u>Targeted aviation stakeholder engagement:</u></p> <p>The change sponsor shared their Stakeholder Engagement Plan with the CAA prior to the engagement activity commencing and incorporated feedback that was provided. It was also uploaded to the portal at the point of submission. It outlined the change sponsor's approach to engagement with targeted aviation stakeholders, which included separating stakeholders into the following three categories:</p> <ul style="list-style-type: none"> <li>• <u>Stakeholders where procedures will be agreed</u> (a group of stakeholders who the change sponsor will communicate with while the TRA is in place and the operation is ongoing. Procedures will need to be agreed in advance for this communication and the input of these stakeholders on the procedures and TRA design is vital for safe operations). The change sponsor considers these stakeholders to include: NATS, Emergency Helicopter Services and Military operations, (MCA, LAA and other Helicopter Emergency Medical Services (HEMS), NPAS) who may need to task aircraft into the TRA at short notice, MOD-DAATM and London Metropolitan Police (for access to R157).</li> <li>• <u>Aviation stakeholders where direct feedback is important</u> (a group of stakeholders who may utilise the airspace of the TRA or have their operations impacted by the TRA). All helicopter operations within the proposed operating area (Network Rail) and other (VLOS) drone operators (Network Rail, London Metropolitan Police, London Fire Brigade and Association of ARPAS-UK).</li> <li>• <u>Stakeholders where feedback is important</u> (a group of stakeholders who may not require using the airspace of the TRA or will not be impacted by the TRA but may have an interest in the operations). Drone Major, HCGB, UKAB.</li> </ul> <p>The change sponsor explained that feedback relating to the safety and operational aspects of the proposal would be requested from each of the above groups. Stakeholders with whom procedures will be agreed with received early virtual briefings for the proposed TRA (prior to the formal engagement period), with a request for a dialogue to discuss procedures for operations. These are outlined in a table in Appendix A of the Stakeholder Engagement Plan.</p> <p>Four rounds of engagement were undertaken by the change sponsor. All stakeholders received an email from the change sponsor notifying them of the first engagement period. The email included the stakeholder engagement material, which outlined the proposal in greater detail, a frequently asked questions page and further details into how to submit feedback. A feedback form was also attached to the email. A screenshot of the email sent to all stakeholders at the start of the engagement period was attached to Appendix A of Annex G (the screenshot did not however include the date, or time when the email was sent). A screenshot of the follow-up email sent to stakeholders was also included, although again the screenshot did not include a date, or time. However, the 'Summary Table of</p>	



	<p>Communication' on p.5 of Annex G, suggests that the email was sent ten days before the engagement period ended. The change sponsor also explained that they would offer video/telephone calls should the stakeholder prefer.</p> <p>There is evidence that feedback was proactively sought from stakeholders and in addition the sponsor asked to agree procedures with particular stakeholders, for example those that may require access to the TRA and those they would communicate with whilst the TRA is operational. Where the change sponsor was unable to obtain a response from key stakeholders they needed to agree procedures with during this period, meetings or phone calls were set-up after the first round of engagement (for example with the LAA, London Metropolitan Police and Network Rail).</p> <p>The change sponsor undertook a second round of engagement due to an adjustment in timelines and the height of the proposed TRA. Similarly, to the previous engagement period, an email was sent to all stakeholders, which included a revision to the stakeholder engagement material. Screenshots of both the initial engagement email and the follow-up email have been included within the Appendix A of Annex G, although the dates and times these emails were sent were not included within the screenshots. The change sponsor asked for feedback on the updated proposal to be provided via email.</p> <p>The change sponsor conducted a third round of engagement, solely to seek feedback relating to the safety and operational aspects of the new timeline they were proposing, which they explained had a tentative start date between May and July 2024, after it was suggested by the CAA to engage on a flexible start date to mitigate the need for further engagement should there be any further delays. This engagement was predominantly conducted via email although the sponsor did set up a phone call with the London Metropolitan Police where they discussed procedures in more detail. Appendix B in Annex G includes screenshots of the initial engagement and follow-up emails that were sent by the change sponsor. These included the dates and times these were sent.</p> <p>A fourth and final round of consultation that was undertaken by the change sponsor, due to a proposed extended timeline adjustments. Screenshots of the email sent to stakeholders at the start of the engagement period, along with the reminder email was included in Appendix C of Annex G.</p>	
3	What materials have been used by the change sponsor during the targeted engagement?	YES
	<p>The Stakeholder Engagement Plan was sent to the CAA for comment, prior to the first formal round of consultation. This clearly articulated how the change sponsor intends to engage with the stakeholders that have been identified through the engagement process.</p> <p>In advance of the first formal engagement period Annex G explains that all emergency services operators and the military were contacted in advance, in order to discuss the necessary mitigations to ensure safe deconfliction with the operations. Following this, Annex G explains that on 21<sup>st</sup> November 2023 these operators were provided with a copy of "Annex B: TRA Access for Emergency Services and Military Operations V1.2", which details procedures for short notice entry into the TRA for both crewed and uncrewed aircraft. A copy of</p>	



the email has been included in Appendix A of Annex G (email 3) where the change sponsor expressed that their aim is to ensure that the TRA will not impact these operations, and that they would like to work together throughout the trial to monitor the effectiveness of the entry procedures and identify where changes should be made. An updated version of Annex B was also shared during the third engagement period.

At the commencement of the first engagement period, the change sponsor engaged with targeted aviation stakeholders on the safety and operational viability of the proposal in line with the requirements of CAP1616. The Stakeholder Engagement Material that was sent to all stakeholders at the start of the engagement period explained the objectives of the proposal, i.e., to successfully trial operational procedures to support the safe integration of BVLOS UAS operations in Class D airspace, in addition to providing faster, reliable deliveries of urgent blood samples from Guy's to St Thomas' Hospital for a 6-month period between 12<sup>th</sup> February and 12<sup>th</sup> August 2024.

The Stakeholder Engagement Material included a visual illustration of the TRA outline, with one overlaid onto the London Heli-route chart (although the source of the chart outlined within both the Stakeholder Engagement Material and Figure 3 of the Trial Submission Pack is not clear). TRA dimensions were also included, in addition to information about the UAS. The engagement material also addressed proposed activation and NOTAM arrangements, advising that operations will take place on weekdays in daylight hours between 0900-1700, with approximately 10 return flights per day. It advised that NOTAMs will be published at least 24 hours in advance of planned flights. An FAQ section which provided key details to stakeholders. These FAQs confirmed that Heli route 4 operations wouldn't be affected, and that the change sponsor plans to inform the general public of the trial, with more details of planned events being provided in the formal ACP submission.

The change sponsor asked for any feedback relating to the safety and operational aspects of the proposal specifically. Responses were requested via a simple feedback form which was attached to the email distributed at the beginning of the engagement period. The form asked stakeholders for their name, email address, the name of the organisation they are presenting, their position regarding the proposal (support/oppose/neither) and had a section for feedback/comments to be added. The form asked for responses to be sent to a dedicated Apian email address by 17<sup>th</sup> November 2023.

A copy of the engagement material and the feedback form were uploaded to the airspace change portal on the first day of the first engagement period. The engagement material encouraged anyone to respond with feedback even if they had not been identified as a stakeholder, although the submission doesn't show that anyone outside the targeted aviation stakeholders responded.

For the second, third and fourth periods of engagement, the emails sent by the change sponsor included details of the proposal (second engagement) with an explanation as to why further feedback was being sought. It was made clear that if feedback previously provided and this remains unchanged then a response was not being sought.

4	Does the Engagement Summary Report clearly detail the period of engagement? Please include the start/end date and duration of engagement period along with a summary of the change sponsors rationale for pursuing a shorter/longer engagement (where applicable).	YES
	<p>Annex G details the four rounds of engagement that were conducted by the change sponsor. These lasted for a total of 12 weeks during the following periods between October 2023 and June 2024:</p> <ul style="list-style-type: none"> <li>• Friday 6<sup>th</sup> October 2023 to Friday 17<sup>th</sup> November 2023 (six weeks)</li> <li>• Tuesday 2<sup>nd</sup> January 2024 to Tuesday 16<sup>th</sup> January 2024 (two weeks)</li> <li>• Wednesday 21<sup>st</sup> February to Wednesday 6<sup>th</sup> March 2024 (two weeks)</li> <li>• Thursday 13<sup>th</sup> June 2014 to Friday 28<sup>th</sup> June 2024 (two weeks, one day)</li> </ul> <p>The initial engagement period that lasted for six weeks was based upon guidance from the CAA and the change sponsor considering this to be a suitable timeframe given the pre-application stakeholder engagement that had already taken place in the area. Whilst a rationale was not provided for the subsequent shorter periods of engagement, these appear to be appropriate given that no substantial amendments were proposed to the TRA by the change sponsor.</p> <p>The Stakeholder Engagement Plan also explains that some informal engagement had already taken place within the area and that should any stakeholders request an extension to the feedback window, they will address this and respond accordingly.</p> <p>No rationale appears to have been provided for the subsequent shorter periods of engagement that were undertaken, although these appear to be proportionate given the six weeks allocated to the first round and no major changes to the proposal were being sought other than an amendment to the TRA height in the second round of engagement and changes to the start/end dates of the trial.</p>	
5	Was the period of engagement appropriate?	YES
	<p>The initial period of engagement that lasted for six weeks and the subsequent shorter periods of engagement were appropriate, due to the type and scale of the proposal, along with its potential impact. 12 aviation stakeholders provided feedback during the first period of engagement and feedback was received from eight, five and four respectively during the second, third and fourth engagement periods.</p> <p>After the initial email to stakeholders asking for feedback on 6<sup>th</sup> October 2023, the change sponsor sent a reminder email on 7<sup>th</sup> November 2023 (10 days before the end of the formal engagement period) to those who hadn't yet responded. Follow-up emails were also sent after the end of the engagement period to key stakeholders who are technically allowed to operate in the area, to ensure they had the chance to provide feedback. As above, where the change sponsor was unable to obtain a response from key stakeholders they needed to agree procedures with, they set up meetings or phone calls after the first round of engagement (for example with the LAA, London Metropolitan Police, Network Rail and NPAS). Overall, the change sponsor achieved a good response rate from key stakeholders and no requests were made for additional time to respond.</p>	



	No rationale appears to have been provided for the subsequent shorter periods of engagement that were undertaken, although these appear to be proportionate given the six weeks allocated to the first round and no major changes to the proposal were being sought other than an amendment to the TRA height in the second round of engagement and changes to the start/end dates of the trial. The change sponsor took a similar approach with regard to sending out reminder emails to stakeholders before the second, third and fourth rounds of engagement were due to end, in order to prompt responses.	
6	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?	YES
	<p>Within Annex G, the change sponsor included a set of tables summarising the communication that had taken place during the four periods of engagement. The tables show which emails were sent to stakeholders and when, along with a summary of whether the proposal was supported, and which stakeholders did and didn't respond. All the evidence including communication summary tables, email correspondence and responses have been provided in Annex G.</p> <p>Upon request from the CAA, the change sponsor also provided unredacted copies of emails received during all four engagement periods. Where engagement was via a phone call or meeting, the change sponsor summarised their conversations and agreements in an email to the stakeholder, giving them the opportunity to confirm their conversation was captured accurately. However, where a stakeholder has responded simply saying they support the proposal, email evidence of a response from the change sponsor hasn't always been provided.</p> <p>The initial submission didn't include analysis of stakeholder feedback and their responses. However, upon request from the CAA, the change sponsor provided this within Annex G from versions 1.2 onwards. Following a further recommendation from the CAA, the change sponsor added further details to their summary of stakeholder feedback, including a summary of some key feedback themes which were previously missing from the feedback analysis. Whilst it is clear from the tables which stakeholder provided feedback during each specific engagement period, the feedback received during each engagement period has been summarised by stakeholder group rather than by individual stakeholders. For the first and second periods of engagement, it is not clear which feedback summary relates to which engagement period, as Annex G summarises these responses under the heading: "Stakeholder engagement (first and second engagement periods). However, it was possible to work out which feedback relates to which period of engagement, when going through the evidence. Responses received during the third and fourth engagement periods have been summarised under their own headings.</p> <p>Stakeholders when responding to the periods of engagement were asked to state whether they supported, opposed, or neither supported, nor opposed the proposal. The summary tables within Annex G included a status column as to whether each stakeholder supported, or objected to the proposal and this accurately represents the responses received that are shown as email screenshots in Appendix A, B and C of Annex G.</p> <p>The 12 stakeholders who responded during the first engagement period and supported and identified no issues with it are: ARPAS, Bristow Helicopters, London Air Ambulance, London Fire Brigade, London Metropolitan Police, Maritime Coastguard Agency, MoD-DAATM, NATS, National Grid, Network Rail and the National Police Air Service. Upon feedback from the CAA, the proposal was amended</p>	



	<p>after the first round of engagement. The TRA ceiling was adjusted to be published as AMSL, in order to ensure the correct height is indicated on the NOTAM and the timeline was also updated to delay operations by approximately two months.</p> <p>Eight stakeholders provided feedback during the second engagement period. Seven of these stakeholders provided feedback during the first engagement period and continue to support the proposal and the eighth (Airprox Board, who didn't previously respond), also supported the proposal. The third period of engagement had six responses, all of whom had previously responded with indications of support and the fourth engagement period received four responses, which included the BTP. Again, all were supportive.</p> <p>The response rates for the first, second, third and fourth periods of engagement were 67%, 44%, 33% and 21% respectively.</p> <p>As stated previously, the BTP were not formally engaged with by the change sponsor, during the first, second and third periods of engagement. Following a recommendation by the CAA, the change sponsor contacted the BTP by email, prior to the fourth period of engagement on 24<sup>th</sup> May 2024. A screenshot of the email has been included in Appendix C of Annex G and the change sponsor attached the latest stakeholder engagement material that was sent to all other stakeholders, along with a summary of the TRA access for emergency services and the military. A supportive response was received on 30<sup>th</sup> May 2024 has been accurately summarised in Annex G and screenshots of the response are contained in Appendix C of Annex G. The BTP were contacted again at the start of the fourth engagement period.</p> <p>Following the responses received, no changes to the proposed to the TRA area or the trial procedures were judged to be necessary. However, the change sponsor has agreed to the following:</p> <ul style="list-style-type: none"> <li>• Developed and agreed (with NATS and the UAS Operator, Wing) safe procedures to ensure emergency services (crewed and uncrewed) can access the airspace at short notice. These procedures were shared with the emergency service operators during engagement and no requests were made to amend these.</li> <li>• Include contact information and instructions on the NOTAM for non-emergency VLOS operators to request access.</li> </ul>
7	<p>Is the change sponsor's response to the issues raised appropriate/adequate?</p> <p>YES</p>
	<p>The feedback provided by the change sponsor to all of the responses received during all four periods of engagement are outlined in sections 2, 3 and 4 of Annex G. Responses from both stakeholders and the change sponsor can be placed into the following themes:</p> <p><b>1. Stakeholder feedback received during the first period of engagement.</b></p> <p><b>Agreement of procedures with NATS as the ANSP</b></p> <p>NATS responded via the feedback form during the first period of engagement and it's clear from the correspondence that the change sponsor undertook regular engagement with them with regards to this proposal. NATS commented on workshops that have taken place with stakeholders that have resulted in robust draft ATC procedures being agreed that have had initial safety assurance activities completed, with</p>



no indication of increased risk being deployed within the NERL operation.

NATS stated that they are supportive of the proposal, citing that the TRA structure will have minimal impact to the NERL and due to its operating volume, it will be unlikely impact other non-priority users in the area. NATS confirmed that they have been working with the change sponsor to ensure access for emergency services, and confirmed they are comfortable with the measures put in place. NATS also confirmed that they are content to provide operational feedback and data capture to demonstrate the success criteria of the trial. It was requested that ATC procedures and LoAs are finalised ahead of an agreed deployment date.

Change Sponsor's response: Welcomed the response from NATS. Developed and agreed safe procedures to ensure emergency services can access the airspace at short notice. The trial submission pack document explains that the daily UAS operations and the deconfliction with other crewed or uncrewed aircraft will be managed by NATS in coordination with the UAS operator (Wing). Further details of the procedures are provided in Annexes C and D, which detail a LoA and a TOI between the change sponsor, Wing and NATS. The change sponsor has advised the CAA that contacting NATS to gain clearance to enter would be a normal procedure for these operators for other TRAs that operate in the area and since NATS already have a separate signed LoA with the change sponsor and Wing, the change sponsor has advised they won't require signatures from the emergency services or military for this document (Annex B).

A detailed LoA between NATS, the change sponsor and Wing has been developed and provided in Annex C as a result of the change sponsor's engagement with NATS. The submission document also advises that NATS has developed the TOI (in Annex D).

Agreeing procedures for emergency services to access the airspace and including contact details for the operations team on the NOTAM were measures the change sponsor had already committed to in the original stakeholder engagement material, but had been in the process of being developed. The change sponsor has engaged with NATS and operators who may require access for their crewed and uncrewed operations, to understand their operations and has developed procedures to allow Emergency Services and military operations to enter the TRA at short notice. These have been summarised in Annex B which has been shared with the operators.

#### **Impact on and agreement of procedures for Emergency Service Operators**

Bristow noted that they occasionally fly into Regent's Park for medical transfers; however, advised that they don't see any issues since the proposed TRA is only up to 400 AGL. They asked to be added to the change sponsor's list of interested parties for any future communications.

The Maritime Coastguard Agency confirmed they are content with the proposal since it is rare that they come into London and asked to be notified when they can share the procedures document with the Joint Rescue Coordination Centre.

NPAS had a telephone conversation with the change sponsor, which has been documented and included in Annex G. It shows that NPAS

were supportive of the proposal and stated that while they are able to operate at 300ft in the area of the TRA, it is highly unlikely that police helicopters would do so. They were content to request access via NATS if they need to enter the TRA.



The London Air Ambulance (LAA) responded via email. They were supportive of the proposal, as it is below 400ft, but wished to seek clarification on the procedures for entering the TRA should they be tasked to enter/land in the TRA. Specifically, they wished for confirmation the procedures only apply when they are tasked and need to land in the TRA, confirmation on the process of identifying to ATC that they are being tasked to land in the TRA, confirmation that the communication between ATC and the drone operator is sufficient to ensure any drone is landed within 4 minutes of the call originating from HEMS, and confirmation that the drone has landed or not. They also asked for their new Chief Pilot to be copied in on all future communications.

The London Fire Brigade responded via the feedback form after a telephone conversation with the change sponsor. They were supportive of the proposal and the opportunities it can lead to in the future and highlighted the need for good communication with operators. They wished to be able to communicate when operating in or near the TRA so that an air crossing can be postponed until their operations have ceased, and then they would call again for notification so that the sponsor's operations can resume.

Change Sponsor's response: Welcomed the above and shared with the London Metropolitan Police a copy of Annex B. Their response to establishing communications with Police Officers on the ground is summarised in Annex F: Community Engagement Plan and summarised under Q9 below. With regard to the London Fire Brigade's response, the change sponsor has advised in Annex G and to the CAA via email that they shared the summary of procedures document (Annex B) which states how access is provided and advised that their procedures require them to confirm with NATS before they start operations and check NOTAMs.

The change sponsor confirmed with the LAA via email that the procedures only apply when the TRA is activated, which will be notified via NOTAM and will be between Mon-Fri for 6 hours during daylight hours, with a maximum of 10 deliveries taking place, with each delivery taking a few minutes. They confirmed that ATC controllers will be briefed on the TRA and procedures and that there will be a phone number for direct calls between the drone operator and NATS which will be programmed into their comms system. They stated that the line will be checked at the start of each day and that NATS will receive confirmation from the drone operator when the drone has landed. The change sponsor subsequently arranged a meeting with the LAA last December to discuss their operations in more detail and has provided minutes of this meeting within Annex G. The change sponsor sought an understanding of the LAA's operations and agreements were made



regarding entry to the TRA. In particular, it was agreed that if the Heli med is required to enter the TRA, they will request access via NATS (who will coordinate with Wing) and if they are required to land in the TRA, UAS operations will remain paused until they have departed the area. This is also detailed within Annex D dated 8<sup>th</sup> April 2024 (TOI with NATS). The change sponsor also met with the LAA crews in January to discuss the trial, operations and procedures, where they verbally confirmed their support for the project.

**Impact on military operations.**

MoD-DAATM confirmed via email that they have coordinated responses across the MoD and that there will be no negligible impact on their operations regarding the proposal.

Change Sponsor's response: Acknowledged, with no further comment.

**Impact on other operators.**

ARPAS responded via the feedback form. They were supportive of the proposal given that contact details will be provided on the NOTAM for VLOS operators who may request to enter the TRA.

Network Rail (who operate both crewed and uncrewed aircraft) had a change in personnel so were unable to respond within the first engagement period, however the sponsor met with Network Rail after the first engagement period where they discussed the proposal. Network Rail confirmed that their operations for crewed aircraft were not conducted at the heights of the TRA in London so did not see the proposal causing any issues to operations. They confirmed that VLOS activities in the 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, they did not see this impacting their operations.

Change sponsor's response: The change sponsor summarised the conversation with Network Rail in an email provided within Annex G, to which the stakeholder responded to confirm it accurately reflects their conversation. The change sponsor has also explained in Annex G that they agreed to include contact information and instructions on the NOTAM for non-emergency VLOS operators to request access. The procedure for this is explained in Annex C section A.2.7.2.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

**Safe separation between helicopter traffic using H4 route and the TRA.**

The UK Airprox Board were supportive of the proposal but were concerned that helicopter traffic following the H4 London Heli Lanes route could potentially be within 500ft of the maximum altitude of the RPAS operation with very little displacement. They advised although this should not represent a specific safety issue if all procedures are followed, it does rely on the helicopter pilot to remain outside of the TRA and sighting the RPAS to ensure that safe separation is maintained. They suggested this could be further assisted by the RPAS carrying an ADS-B capable transponder.

Change Sponsor's response: The change sponsor explained the purpose of the TRA is to ensure that the drone operation and crewed operations are safely separated and advised that the drone will only operate within the TRA and that Operational Authorisation from the CAA will be required before any UAS operations can be conducted. They also explained that they have engaged stakeholders who may operate in the area and have worked with organisations who are exempt from the 500ft rule (e.g., HEMS operators) so their operations are understood. It was made clear that this engagement is informing the development of appropriate procedures which will be in place to support the short notice access to the TRA they may require. The change sponsor also advised that the TRA details will be published via NOTAM to ensure airspace users are aware of the operations. The change sponsor in their response to Airprox, offered to set up a call if



they would like to discuss anything further, although it is unclear whether this took place.

### **Impact on London Heliport.**

London Heliport responded via the feedback form and were supportive of the proposal given that it is outside of their Air Traffic Zone and outside of their Flight Restriction Zone for the use of drones. They confirmed they were content with the mitigations being put in place. Acknowledged by the change sponsor, with no further action required.

## **2. Stakeholder feedback received during the second period of engagement.**

The eight stakeholders who responded during the second round of engagement (Airprox Board, ARPAS, London Air Ambulance, London Heliport, London Metropolitan Police, NATS, National Grid and Network Rail) stated that the minor amendments made to the proposal did not impact their support for this ACP.

## **3. Stakeholder feedback received during the third period of engagement.**

Four of the stakeholders who responded during this engagement period (the LAA, London Metropolitan Police, the MoD-DAATM and NATS), stated that the adjustment in timelines wouldn't alter their operations. The British Helicopter Association (BHA) requested details of the processes in place with emergency services and asked to see an unredacted version. The change sponsor provided an unredacted version of Annex B and explained the aviation stakeholders which they have been in communication with regarding this ACP and the procedures developed. The BHA were content with the procedures. An updated version of Annex B: TRA Access for Emergency Services and Military Operations v1.2 was also shared with the emergency services and the military on 21<sup>st</sup> February and no comments were received regarding this apart from the MoD stating they were happy with the updated document. As stated previously, engagement with the London Metropolitan Police continued beyond the third engagement period to agree procedures relating to the access of R157.

On 24<sup>th</sup> May, the change sponsor contacted the BTP via email, asking for feedback on the proposal. As stated previously, this is the first time the change sponsor had contacted the BTP regarding this ACP. The response from the BTP, which was received on 30<sup>th</sup> May was supportive, although they stated that a drone team is based at London Bridge station and sought assurances that access to the TRA can be gained at short notice. In the light of this they requested to be kept in contact with regard to the trial.

Change Sponsor's response: Confirmed that the BTP would be prioritised, and procedures will be in place for access to the TRA at short notice, should it be required.

## **4. Stakeholder feedback received during the fourth period of engagement.**

	The four stakeholders who responded during the fourth round of engagement (BTP, NATS, MoD-DAATM and London Heliport) stated that the minor amendments made to the proposal did not impact their support for this ACP. This was acknowledged by the change sponsor, with no amendments to the proposal being made.	
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
	<p>Section 7 of the Stakeholder Engagement Plan summarises the change sponsor's approach to potential complaints received during the period in which the TRA is active. It states that the change sponsor's contact details will be provided directly to all stakeholders and these contact details will be included in the relevant Aeronautical Information Circular announcing the TRA and the relevant NOTAM. All complaints will be addressed and forwarded to the CAA. Ideally, this should be outlined in the TRA Submission document. This can be included by way of a condition under Section 11.</p> <p>Both Annex F: Community Engagement Plan (version 1.4) and the Trial Submission Pack (version 1.6, dated 2<sup>nd</sup> July 2024), summarise the change sponsor's approach to potential complaints received. The Trial Submission Pack states that should the TRA submission gain approval, the change sponsor will put in place appropriate measures for the monitoring, collating and reporting on the level and contents of any complaints received to the CAA. It also says that stakeholders will be notified of how they can provide feedback or a complaint prior to activation of the TRA. Section 7.2: Monitoring Trial Process commits the change sponsor to updating the CAA Regulatory Team immediately on any safety concerns and every two weeks on any relevant feedback from stakeholders.</p> <p>Annex F makes clear that a website FAQs page will be set-up that provides essential information on the ACP where easy means of providing feedback (including complaints) will be prominently displayed. The annex also explains that flyers will be distributed to community stakeholders before implementation, which will include contact details for members of the public to ask further questions and provide feedback. The change sponsor has also committed itself to ensuring both Southwark and Lambeth Councils' complaints teams are fully briefed and are able to respond to queries that may arise.</p>	
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
	<p>As the trial area is located over a highly populated area of London, the proposal will affect traffic operating below 7,000ft. The TRA ceiling is 450ft AMSL and although many operators in the area will not fly at the altitude of the TRA, emergency service operators and the military are legally permitted to fly/land within the TRA upon a request to enter. The change sponsor will be required to inform relevant community stakeholders that the trial is taking place, the likely impacts and what will happen next, if the trial is approved.</p> <p><u>Public engagement:</u> The change sponsor has provided a comprehensive community engagement plan in Annex F of their submission which documents how</p>	



relevant community stakeholders will be notified of the trial, if approved. Community stakeholder categories that they plan to reach are as follows: Healthcare partners (e.g., GSTT), residents, voluntary community sector organisations, local businesses and their staff, elected representatives (e.g., Council Transport Teams, MPs, Mayor of London), Council interest groups, Local authorities and other public services (e.g., borough councils, schools, religious sites and local police).

Although the sponsor has identified the stakeholder groups they will inform within Annex F, they haven't been specific about how they will identify within specific groups [REDACTED]

[REDACTED] Update 13.05.24: Annex F describes how the change they will inform people in the vicinity of the flight operations (within the TRA). The change sponsor hasn't provided a copy of the engagement material they plan to use to inform communities and therefore we are unable to see the level of detail they are planning to provide in terms of information about the UAS and noise impacts, and who they will share this with. This has been requested.

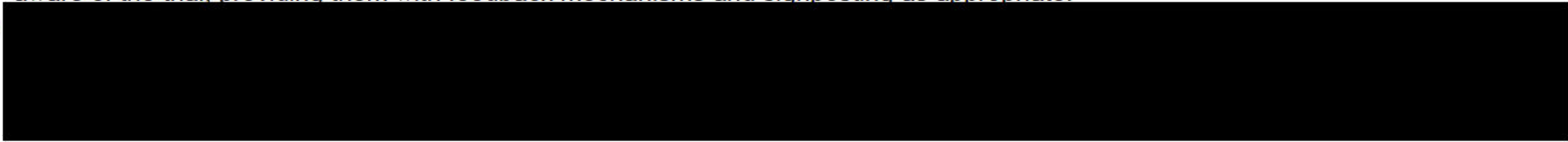
Wing on behalf of the change sponsor, plans to use a variety of engagement methods to reach these community stakeholders, including face to face visits / door knocking, social media marketing and email outreach. They are also planning to develop a website with detailed FAQs, in addition to setting up pop-up stalls in public locations, organising an open house event which will be advertised via social media and flyers/posters in local neighbourhoods and offering private presentations for key local decision makers. The change sponsor also plans to distribute flyers to the community before the trial begins, in order to provide basic information about the operations and answer the most common questions. These flyers will also provide contact details for members of the community to ask further questions and provide feedback. The change sponsor will also organise a longitudinal sentiment analysis survey, where they will engage a third-party research firm to conduct pre-and post-trial research to establish the impact the trial had on those who live and work in the vicinity of flight operations.

A draft timeline of all the above activities is summarised in a table at the end of Annex F, which shows the methods the change sponsor intends to use when attempting to contact each of the prescribed community stakeholders.

The change sponsor also intends to undertake bespoke community engagement, to ensure they have the required operational information to conduct their business as usual. These organisations include:

- [REDACTED]
- Southwark and Lambeth Councils – are responsible for ensuring operations at Guy's Hospital and St Thomas' Hospital respectively are in line with Council planning policy since the hospitals are the delivery and landing sites. Apian/Wing will continue to work closely with the councils to ensure their complaints teams are fully briefed on the project to ensure they can respond to queries that may come from their



	<p>local residents, signposting them as appropriate.</p> <ul style="list-style-type: none"> <li>• <u>Guy's and St Thomas' NHS Foundation Trust (GSTT)</u> – As the healthcare partner for this trial, GSTT is supporting the engagement required at both hospital sites therefore Apian will work with teams across Guys' and St Thomas' Hospitals as part of their holistic monitoring and evaluation of all aspects of the trial. Apian and GSTT are working together to ensure NHS Trust staff and patients are aware of the trial, providing them with feedback mechanisms and signposting as appropriate.</li> <li>• </li> </ul> <p>It is considered that the BTP should also be included within the above list, due to the change sponsor's engagement with them, prior to the fourth period of engagement and to ensure that all sections of the Police within the TRA re informed. This has been listed as a condition under Section 11.</p>	
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
	<p>The periods of engagement were proportionate, and the material sent out to stakeholders was of sufficient detail to enable stakeholders to provide a meaningful response. The change sponsor has provided a satisfactory rationale for the list of stakeholders it had identified and engaged with.</p> <p>It is evident from the submission material that the change sponsor has achieved meaningful two-way engagement with targeted aviation stakeholders across some early engagement and the four formal engagement periods. Although the TRA design and trial procedures haven't been amended following stakeholder feedback, the change sponsor has:</p> <ul style="list-style-type: none"> <li>• Developed and agreed (with NATS and Wing) safe procedures to ensure emergency services (both crewed and uncrewed) can access the airspace at short notice. These procedures were shared with the emergency service operators during the engagement period and no requests were made to amend these. An LOA has also been agreed.</li> <li>• Confirmed they will include contact information and instructions on the NOTAM for non-emergency VLOS operators to request access</li> </ul> <p>The change sponsor has also taken onboard several recommendations and requests from the CAA underpinning CAP 1616 requirements to make their submission documents clearer for both stakeholders and the CAA and has produced updated versions to incorporate these.</p> <p>The requirement to include the BTP within the list of stakeholders where the change sponsor intends to undertake bespoke community engagement within Annex F, is listed as a condition under Section 11.</p>	



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"> <li>• The TOIs/LOAs mentioned in the final submission between the sponsor, the UAS operator (Wing) and NATS (detailed within Annex C and Annex D) are finalised. 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 TRA.</li> <li>• The change sponsor must inform the full range of stakeholder groups of the decision (when published), likely impacts and what will happen next. The sponsor must clearly communicate the change in dates of operation since engagement and the confirmed dates of operation for the trial, when informing all stakeholders of the decision. The change sponsor must ensure that all materials used to inform and engage with communities contain clear and sufficient information regarding the proposal. At a minimum, this must include sufficient explanation about the [REDACTED] associated noise impacts, an explanation about plans to mitigate any noise impacts) and contact details to allow them to provide feedback.</li> <li>• The change sponsor must provide evidence, before the trial commences that all stakeholders have been informed of the trial objectives, planned operations (including effective period of the trial, expected frequency and timings of UAS flights, typical altitudes and noise levels), together with the change sponsor's contact details in order that stakeholders can relay any queries or complaints. The list of stakeholders to be informed must include noise sensitive receptors, identified as residences, schools, hospitals and places of worship.</li> <li>• Include the British Transport Police within the list of stakeholders where bespoke community engagement is intended within Annex F.</li> <li>• The change sponsor is required to collate, monitor, and report to the CAA on the level and contents of feedback received during the period of the trial. The CAA expect reporting on the level and contents of any stakeholder feedback received on a fortnightly basis throughout the duration of the trial (this should include nil returns). The change sponsor should send these reports to the assigned Account Manager/Case Officer.</li> </ul>		
<b>Targeted Engagement Assessment sign-off</b>			
	<b>Name</b>	<b>Signature</b>	<b>Date</b>
Assessment completed by Airspace Regulator (Engagement and Consultation)	[REDACTED]	[REDACTED]	30 <sup>th</sup> July 2024