

BVLOS Trial in Unsegregated Airspace

Remotely Piloted Drone Flight Trial Documentation:

Annex A: Engagement Strategy

ACP-2024-001

The NATS logo is positioned on the right side of the page. It consists of the word "NATS" in a bold, italicized, sans-serif font. The letters are dark blue with a subtle gradient and a slight shadow effect. The logo is set against a background of two parallel teal lines that curve from the top left towards the bottom right, framing the logo.

Document version:
V1.0

Contents:

1. Introduction	3
1.1. Background	3
1.2. About this document	3
1.3. Where are we in the airspace change process?	3
2. Summary of Engagement Activity Undertaken	4
2.1. Early engagement	4
3. Audience	5
3.1. What types of stakeholders are we engaging?	5
3.2. Stakeholder list	5
4. Approach	7
4.1. How will we engage	7
5. Materials	7
5.1. Accessibility	7
5.2. Engagement Document	7
6. Length	8
7. Post Engagement	8
7.2. Response Categorisation	8
8. Conclusions	8
8.1. Summary	8
8.2. Next Steps	8

Change History

Issue	Month Year	Change in this issue (most recent first)
V1.0	December 2024	Published on CAA airspace change portal

1. Introduction

1.1. Background

- 1.1.1. This document outlines the strategy for engaging with stakeholders as part of the CAP1616 Airspace Change Process for the BVLOS (Beyond Visual Line of Sight) Trial in Unsegregated Airspace (ACP-2024-001).
- 1.1.2. NATS Services Ltd. (NSL) will demonstrate a safe and scalable solution to enable accommodation of uncrewed operation(s) alongside crewed operations within unsegregated airspace. The trial is designed to gather evidence on safely integrating uncrewed aircraft operations alongside traditional crewed aircraft in unsegregated airspace, supporting the development of CAA policies on BVLOS operations and Detect-and-Avoid (DAA) standards. NATS Services, in partnership with Flylogix, aims to achieve this through a series of phased trials over the North Sea.

1.2. About this document

- 1.2.1. This document provides information about how we will undertake this engagement. We want to provide relevant and appropriate information to the right people, in the right way, and enable them to provide informed responses to the proposed changes in a suitable timeframe.
- 1.2.2. We consider **who** may be impacted by the proposed changes. The audience comprises of a number of different types of stakeholders; we will describe who they are and how we have classified them.
- 1.2.3. We describe **how** we plan to reach all stakeholders to ensure they have the opportunity to respond effectively, including through engagement exercises.
- 1.2.4. We describe **what** we will use to inform stakeholders of the proposed plans. We will be targeting primarily aviation experts, as such, the materials will contain some technical information. We will endeavour to make this as concise and accessible as possible for those without prior aviation or technical knowledge. We will provide sufficient detail to ensure respondents understand the issues. However, we will also be clear that airspace change is complex and that a time investment is necessary to understand the subject, and that some parts of the material are written for a technical aviation audience.
- 1.2.5. We consider **when** engagement should start and finish, and a planned timetable of activity. This will be a general overview to illustrate our intent, but specific dates have not been agreed at this time.
- 1.2.6. We briefly describe what happens once the engagement **ends**. There will be a period of analysis, and from that analysis we will understand if any changes to the trial design are required considering the feedback.

1.3. Where are we in the airspace change process?

- 1.3.1. NATS Services Ltd. (NSL) is the sponsor of this proposal, with Flylogix as our partner.
- 1.3.2. This airspace change proposal is progressing in accordance with the CAA's airspace change process for trials, described in CAP1616G.
- 1.3.3. We have completed Stage 1 Define, where we established the need for an airspace change trial.
- 1.3.4. We have completed Stage 2 Develop & Assess, where we created initial design concepts and assessed their likely impacts.
- 1.3.5. We are now in Stage 3 Engage, where we will gather information from you, our stakeholders. We want to understand your opinions on the impacts of the trial, operational viability and safety.

- 1.3.6. Supporting documentation can be found on the CAA's airspace change portal at the following [link](#).

2. Summary of Engagement Activity Undertaken

2.1. Early engagement

- 2.1.1. We conducted early engagement with a few of our key stakeholders, where discussions have revolved around the trial airspace design, airspace sectorisation, safety measures, and potential impacts on crewed and uncrewed operations. Based on their feedback, we refined our airspace design and prepared our engagement material.

- 2.1.2. Stakeholders engaged to date are:

- NATS operations,
- Oil and Gas,
- Ministry of Defence (MOD) – DAATM,
- Avinor,
- Maritime and Coastguard Agency (MCA),
- Highlands and Islands Airports Limited (HIAL),
- HeliOffShore.

- 2.1.3. We plan to continue early engagement activities before commencing the Stage 3 - Formal stakeholder engagement. Additional stakeholders that we plan to engage with are:

- GAA,
- AOPA,
- CHC,
- NHV,
- Air Task,
- Bristow SAR,
- Bristow,
- Gama Aviation,
- 2Excel Aviation,
- PDG Helicopters,
- Offshore Helicopter Services UK Ltd,
- Uni-fly,
- Babcock Mission Critical Services Onshore,
- HeliMed – Scottish Ambulance Service – Special Task Desk,
- JRCC.

- 2.1.4. If we are unable to engage with them prior to formal discussions, we will arrange dedicated sessions with them during the formal engagement period.

- 2.1.5. These sessions would be an addition to the approach outlined in Section 4 - Approach.

- 2.1.6. We selected these stakeholders for early engagement due to the proximity of the proposed trial airspace to their operations and the potential impact it may have. **Our initial assessment indicates that the expected impact will be minimal**, however involving them early, we aimed to gather their valuable input on the design and ensure a clear and efficient process moving forward.

3. Audience

3.1. What types of stakeholders are we engaging?

3.1.1. The list of targeted stakeholders includes these general categories:

- Air navigation service providers and air traffic controllers potentially impacted by the change;
- Norway's air traffic control provider;
- General Aviation;
- Airports and aerodromes potentially impacted by the change;
- Oil and gas helicopter operators in North Sea;
- Commercial operators flying over North Sea;
- Association for the offshore helicopter industry;
- Search and Rescue operators;
- Military;
- Private airfields and strips;
- Adjacent airfields and airports;
- Habitat and European registered biodiversity – NatureScot;
- Relevant members of the National Air Traffic Management Advisory Committee (NATMAC), which includes many representatives of airspace users including airline operators, general aviation, sport aviation, Remotely Piloted Aircraft Systems (RPAS)/ Unmanned Aircraft Systems (UAS) operators and the MoD;

3.2. Stakeholder list

3.2.1. The stakeholder list has been developed based on the potential impact this airspace change may have. Our initial assessment indicates that the expected impact will be minimal. However, we highly value feedback of our stakeholders and seek their input to inform our airspace design.

3.2.2. NATS will welcome a response from any individual or organisation.

3.2.3. The full stakeholder list and justification for engagement is in Table 1 below:

Organisation	Stakeholder group	Justification for engagement
Aberdeen ATC	ANSP	Airspace authority and ATS provider for proposed TRA
NATS NERL's North Sea Helicopter Advisory Service	ANSP	ANSP (TRA Controlling Authority)
HIAL	ANSP	Adjacent ANSP
Avinor	ANSP	Norwegian ANSP
CHC	Oil and gas helicopter operator in North Sea	Current North Sea operators
NHV	Oil and gas helicopter operator in North Sea	Current North Sea operators
Bristow	Oil and gas helicopter operator in North Sea	Current North Sea operators
Offshore Helicopter Services UK Ltd	Oil and gas helicopter operator in North Sea	Operating in proximity to proposed TRA
HeliOffShore	Association for the offshore helicopter industry	Forum of offshore helicopter operators
Air Task	Commercial operator flying over the North Sea	Current North Sea operators
Gama Aviation	Commercial operator flying over the North Sea	Current North Sea operators
2Excel Aviation	Commercial operator flying over the North Sea	Current North Sea operators
PDG Helicopters	Commercial operator flying over the North Sea	Current North Sea operators
Uni-fly	Commercial operator flying over the North Sea	Wind energy helicopter operator in North Sea

Organisation	Stakeholder group	Justification for engagement
Airspace for all	General Aviation	A joint undertaking between Sports and Recreational Aviation, Military Aviation and Other Aviation stakeholders
General Aviation Alliance (GAA)	General Aviation	An independent group and partnership of organisations representing UK General Aviation
Aircraft Owners and Pilots Association (AOPA)	General Aviation	Non-profit political organization that advocates for general aviation
Bristow Search And Rescue	SAR	Supports Maritime search and rescue
Joint Rescue Coordination Centre	SAR	Maritime and Air emergency tasking organisation
Scottish Ambulance Service – Special Task Desk	SAS	Coastal blue light operations
Babcock Mission Critical Services Onshore	Helicopter operator	Helicopter operator
DAATM	MoD	Military aviation activity
Hollym airfield	Private airfield	Private Airfield
Fetlar Airstrip	Private airstrip	Proximate to proposed TRA
Sumburg ATC	Adjacent ATC	Adjacent ANSP
Dundee ATC	Adjacent ATC	Adjacent ANSP
Humberside airport	Commercial airfield	Oil and gas helicopters operate
NatureScot	Habitats and European registered biodiversity	HRA engagement
Tingwall Airport (non-HIAL)	Airport	Airport on Shetland about 17nm S of Scatsta
Spaceport	Spaceport	Identified through assessment meeting
Airports UK (new name for AOA)	NATMAC member	Relevant NATMAC member
Airfield Operators Group (AOG)	NATMAC member	Relevant NATMAC member
Association of Remotely Piloted Aircraft Systems UK (ARPAS-UK)	NATMAC member	Relevant NATMAC member
Aviation Environment Federation (AEF)	NATMAC member	Relevant NATMAC member
BAe Systems	NATMAC member	Relevant NATMAC member
British Balloon and Airship Club	NATMAC member	Relevant NATMAC member
British Business and General Aviation Association (BBGA)	NATMAC member	Relevant NATMAC member
British Gliding Association (BGA)	NATMAC member	Relevant NATMAC member
British Helicopter Association (BHA)	NATMAC member	Relevant NATMAC member
British Hang Gliding and Paragliding Association (BHPA)	NATMAC member	Relevant NATMAC member
British Microlight Aircraft Association (BMAA)	NATMAC member	Relevant NATMAC member
British Skydiving	NATMAC member	Relevant NATMAC member
Drone Major	NATMAC member	Relevant NATMAC member

Organisation	Stakeholder group	Justification for engagement
Guild of Air Traffic Control Officers (GATCO)	NATMAC member	Relevant NATMAC member
Honourable Company of Air Pilots (HCAP)	NATMAC member	Relevant NATMAC member
Helicopter Club of Great Britain (HCGB)	NATMAC member	Relevant NATMAC member
Light Aircraft Association (LAA)	NATMAC member	Relevant NATMAC member

Table 1 Stakeholder list

- 3.2.4. There are a few NATMAC members that are excluded from our stakeholder list:
- PPL/IR (Europe) and Isle of Man CAA will not be contacted given the geographic displacement from the trial area.
 - Low Fare Airlines, Heavy Airlines, British Airline Pilots Association (BALPA), and Airlines UK will not be contacted given the low level of trial airspace.
 - Military aviation authority and Navy command HQ will not be contacted directly as DAATM will engage with us as the PoC for UK MoD. Likewise United States Air Force Europe (3rd Air Force-Directorate of Flying (USAFE (3rd AF-DOF)) and United States Visiting Forces (USVF), HQ United States Country Rep-UK (HQ USCR-UK).
 - ACOG – is not a relevant organisation for this trial ACP
 - British Aerospace - is not a geographically relevant organisation for this trial ACP
 - UK Airprox Board – is not a relevant organisation for this trial ACP
 - UK Flight Safety Committee (UKFSC) – is not a relevant organisation for this trial ACP

4. Approach

4.1. How will we engage

- 4.1.1. The engagement material will be shared with those stakeholders listed via email inviting response. If further clarification is needed, we will assess the need for an online meeting and arrange one as appropriate.
- 4.1.2. We have provided example of questions relating to our TRA / TMZ proposal within the engagement material and invite our stakeholders to respond by email.
- 4.1.3. A reminder will be sent at the mid-point of our engagement period, two weeks remaining, to any targeted stakeholders who have not yet responded. We have requested formal confirmation of 'no comment' responses to close any feedback where stakeholders have no additional input to provide.

5. Materials

5.1. Accessibility

- 5.1.1. Our primary stakeholders are considered to be an aviation expert audience; therefore, aviation technical language will be used, in English only.

5.2. Engagement Document

- 5.2.1. This will contain information which will enable stakeholders to make an informed response to the proposed trial, including:
- Introduction to proposal: What, When, Where, and How,

- Proposed airspace design, entry requirements and ruleset,
- Trial objectives and outcomes,
- The potential impacts of the proposal,
- Information on the engagement process - how to respond; what happens next.
- References to further sources of information.

6. Length

- 6.1.1. The stakeholder engagement will commence on 8th of October 2024 and end on 5th November 2024.
- 6.1.2. Given that all our stakeholders are from the aviation sector and considering the early engagement conducted prior to the formal stakeholder engagement, the duration of four weeks for our stakeholder engagement is deemed appropriate.
- 6.1.3. We will send a follow up email after two-week interval, on 22nd October 2024.

7. Post Engagement

- 7.1.1. Feedback received will be collected and systematically categorised based on its relevance and potential impact on the proposed airspace change and trial design.

7.2. Response Categorisation

- 7.2.1. We will carefully review all responses, identifying and extracting common themes and key concerns. These themes will then be considered when updating the final design to ensure stakeholders' viewpoints considered in the overall process.
- 7.2.2. How feedback has been taken into account will be included within the ACP.

8. Conclusions

8.1. Summary

- 8.1.1. We consider this engagement strategy to be reasonable, proportionate, and robust. We will manage the engagement in accordance with this strategy, which has been prepared to ensure the greatest likelihood of success.
- 8.1.2. We have identified the relevant stakeholders and will engage with those most likely to be impacted in accordance with the strategy. We have made it clear that there is scope to change the trial based on their feedback.

8.2. Next Steps

- 8.2.1. We will finalise the engagement material and launch the engagement exercise via emails to our stakeholders.

End of Document