

# CAA Operational Assessment

Title of airspace change proposal	Solent Transport TDA
Change sponsor	Skylift UAV Ltd
Project reference	ACP-2022-106
Account Manager	[REDACTED]
Case study commencement date	16 April 2024 <b>Assessment updated February 2025 on re-submission</b>
Case study report as at	<b>28 February 2025</b>
<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 <b>YES</b> not resolved <b>PARTIALLY</b> not compliant <b>NO</b></p>	

Executive Summary
<p>This ACP is to establish a temporary Danger Area complex in the Solent area using the airspace change process for an airspace trial. As the ACP was commenced and Assessment Meeting completed prior to the 18 Mar 24 it was not transitioned to CAP Version 5 and the requirements remained as per Version 4.</p> <p>Following no decision in May 2024 due to insufficient information in numerous areas, re-engagement and new submission received Jan 2025. This OA contains the original assessment alongside updates from the latest submission.</p>

1.	Justification for change and options analysis (operational/technical)	Status
1.1	Is the explanation of the proposed change clear and understood?	
	<p>The rationale for the change is clearly stated in the summary of the project. The sponsor is aiming to facilitate BVLOS UAS operations to gather data and operational experience to work towards the transition to non-segregated BVLOS UAS operations. The trial will test Detect and Avoid solutions and the introduction of flight planning tools and sensor networks to coordinate UTM and increase situational awareness. It builds on the operations conducted in a previous temporary Danger Area by increasing complexity of aircraft operations within the airspace.</p> <p><a href="#">No change to this in new submission.</a></p>	
1.2	Are the reasons for the change stated and acceptable?	
	<p>The current primary means of achieving BVLOS UAS operations is through airspace segregation, which is achieved through the establishment of a temporary Danger Area. This trial will use BVLOS UAS operations to achieve the aims of the trial, which are described in the submission as:</p> <ul style="list-style-type: none"> <li>- Build and test a comms and flight planning tool to successfully coordinate the live trials.</li> <li>- Introduce a sensor network in the Solent region for situational awareness of cooperative and non-cooperative air traffic, testing of sensors to determine network density for each sensor type.</li> <li>- Increase the complexity of flying from single operator / aircraft to multiple operators / aircraft crossing the trial airspace and using VLOS entry and exit to the stubs. This scenario enables us to simulate safe approaches and departures.</li> <li>- Human factors monitoring of loading and unloading cargo.</li> </ul> <p>The final aim does not require airspace to be established but the temporary Danger Area will not be used solely to facilitate this aim.</p> <p><a href="#">No change to this in new submission.</a></p>	
1.3	Have all appropriate alternative options been considered, including the 'do nothing' option?	
	<p>The proposed design meets current policy for segregation of BVLOS activity – temporary DA in Class G. 'Doing nothing' is not a viable option as it would not enable the trial. Conducting the trial in a simulated environment is not possible.</p> <p><a href="#">No change to this in new submission.</a></p>	

1.4	Is the justification for the selection of the proposed option sound and acceptable?	
	<p>The proposed design meets current policy for segregation of BVLOS activity – TDA in Class G, TSA in CAS. The design evolved in response to stakeholder feedback and enables the trial activity to take place while minimising impacts on other airspace users.</p> <p>No change to this in new submission.</p>	

2.	Airspace description and operational arrangements	Status
2.1	Is the type of proposed airspace design clearly stated and understood?	
	<p>The dimensions of the proposed temporary Danger Area are clearly presented in the form of a diagram overlayed on a satellite type image and a table annotating the coordinates and vertical limits.</p> <p>The submission states that only the required segments of the temporary Danger Area will be activated for each trial but it does not specify which ones these are for each serial.</p> <p>With the amendment of the design post engagement which reduces the size and sections, remaining areas have now been amalgamated into one area with an integrated stub. The entire area is clear on the diagram provided with lat &amp; longs for each point along with activation hts/alt. This negates previous concerns of which segments will be active. See below.</p>	

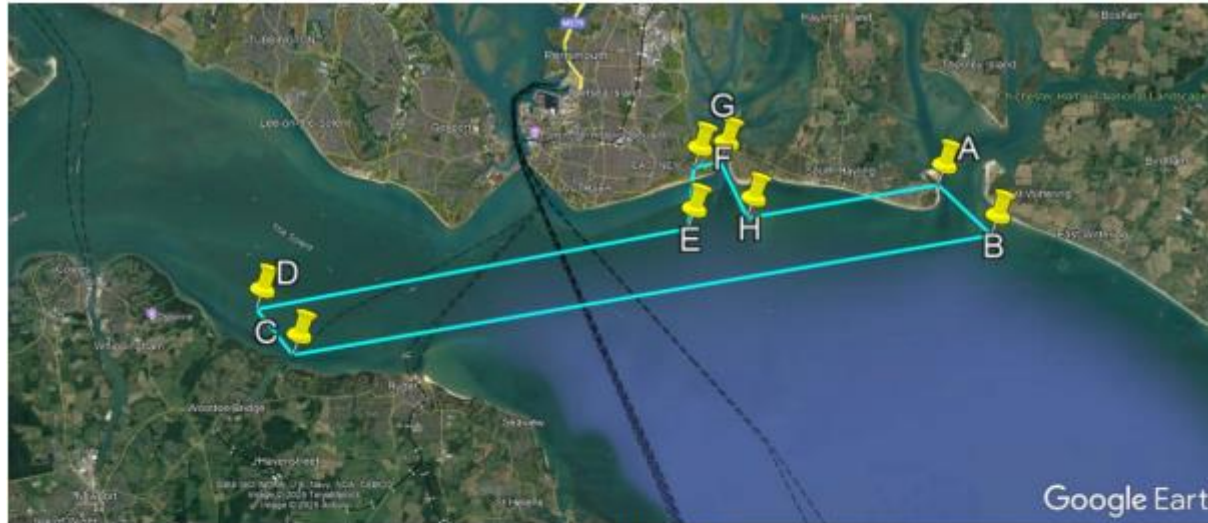


Figure 6 - Final TDA Design

Table 6 – Details of Final TDA Design

Point	Latitude	Longitude	Activation Height (AGL)	Activation Altitude (AMSL) <sup>15</sup>
A	50°47'00"N	000°56'10"W	surface – 600ft	surface – 600ft
B	50°46'10"N	000°54'50"W		
C	50°44'20"N	001°12'30"W		
D	50°45'05"N	001°13'25"W		
E	50°46'20"N	001°02'30"W		
F	50°47'20"N	001°02'20"W		
G	50°47'25"N	001°01'40"W		
H	50°46'30"N	001°01'00"W		

2.2

Are the hours of operation of the airspace and any seasonal variations stated and acceptable?

	<p>The sponsor has stated that the expected hours of operation are Mon-Fri and predominantly in daylight hours. However, their trial plan does not provide detail on the likely times or duration of each trial for the BVLOS phases but instead provides a distance. More detail of planned activation times is required as it would be beneficial to understand how long the temporary Danger Area is expected to be active for each trial.</p> <p>A table stating the intended serials for each week of the trial is included which breaks down the purpose of each serial. The operational hours are stated as Mon-Fri 0900-1700. While the duration of each activity is not mentioned, the sponsor has stated numerous times throughout the submission and engagement material that the TDA will be activated by NOTAM at least 24 hours in advance.</p>	
2.3	Is any interaction with adjacent domestic and international airspace structures stated and acceptable including an explanation of how connectivity is to be achieved? Has the agreement of adjacent States been secured in respect of High Seas airspace changes?	
	<p>There is no interaction with adjacent domestic or international airspace structures. The closest airspace structure is Solent CTA D but this is sufficiently distanced to not be impacted. Irrespective of this, the sponsor did engage with Southampton ATC who had no concerns.</p> <p>This remains extant for the new submission. Southampton ATC strongly support the ACP and have requested a direct contact number from SkyLift which will be provided. Lee On Solent Airport provided no objection during the first round of engagement and did not respond during the second round.</p>	
2.4	Is the supporting statistical evidence relevant and acceptable?	N/A
	N/A	
2.5	Is the analysis of the impact of the traffic mix on complexity and workload of operations complete and satisfactory?	
	<p>The trial activity will take place within segregated airspace therefore preventing the mixing of traffic and minimising complexity. Targeted engagement with local aviation stakeholders was conducted and responses from Fleetlands, Lee-on-Solent, NATS and Southampton ATC showed no concerns for the impact of the airspace on their operations. Engagement with the MOD and Bembridge amended portions of the Danger Area complex to minimise impact to their operations.</p> <p>With the significant reduction of size and dimensions of the TDA, impact on traffic and complexity of workload is reduced further. The TDA is solely over the sea bar one small section incorporating the launch site. MoD, Southampton ATC and NATS are content and with the proposed TDA. No response from Fleetlands or Lee-On-Solent during second engagement but operators at Lee-On-Solent have responded.</p>	

	The sponsor has assured stakeholders operating emergency service aircraft that an LoA will be in place for the trial.	
2.6	Are any draft Letters of Agreement and/or Memoranda of Understanding included and, if so, do they contain the commitments to resolve ATS procedures (ATSD) and airspace management requirements?	
	<p>During stakeholder engagement HM Coastguard identified a need for an LoA that will facilitate emergency access to the temporary Danger Area. The LoA is being produced and a condition will be added to ensure the CAA receive a signed copy prior to the temporary Danger Area being activated for the first time.</p> <p>There is also a Letter of Agreement with Chichester and district Model Aero Club to deconflict activities, which includes a commitment from the sponsor to not activate the temporary Danger Area on the weekend.</p> <p>The LoAs will need to be revisited as there are some inaccuracies between the LoAs and the submission regarding coordinates and vertical extents.</p> <p><b>Condition – Sponsor to provide corrected signed copy of the LoAs to the CAA.</b></p> <p>The CAA has sighted the LoAs, referred to by SkyLift as RoAs – The RoA with Babcock is signed and the one with Bristow Group is in draft, due for signature. These RoA with Babcock needs updating as the following inaccuracies have been noted:  The date effective is 1<sup>st</sup> July 25 – 30<sup>th</sup> November 25 when trial starts in May.  References for actions to be taken should an emergency aircraft require access, one being ‘return to Thorney Island’. Thorney Island is not within the final TDA design and this reference needs to be removed.  The RoA still refers to the helipad at St Mary’s hospital on the IOW, which is not within the final TDA design and should be removed.</p> <p>The RoA with Bristow Group has removed the aforementioned references to areas no longer within the TDA, but still shows the incorrect dates of operation.</p>	
2.7	Should there be any other aviation activity (low flying, gliding, parachuting, microlight site etc) in the vicinity of the new airspace structure and no suitable operating agreements or ATC Procedures can be devised, what action has the change sponsor carried out to resolve any conflicting interests?	

	<p>The sponsor stated in their engagement material that an automated text communication facility will be established which can notify nominated contacts of the ATDs and ETAs of UAS. However, this method does not enable access to the Danger Areas when they are active even if the UAS is not airborne. The change sponsor also states that they can 'collapse the airspace very quickly if necessary' but it is unclear what is meant by this statement. The only method to approve entry into an active Danger Area is by an SUA Crossing Service, which the sponsor has stated will not be provided. A temporary Danger Area which has been activated by NOTAM cannot be quickly deactivated.</p> <p>The sponsor has clarified in the engagement material that the text communication facility is only available for emergency services to enhance the provided information. Should emergency service aircraft wish to enter the TDA during activation they must do this via the critical care desk. Clarification on the ability to collapse the airspace has been provided. This is only available to emergency services or military aircraft. No information on how this will be achieved or how quickly this can happen is provided.</p> <p><b>Condition – Sponsor to clarify intended plan when the TDA needs to be 'collapsed'.</b></p>	
2.8	Is the evidence that the airspace design is compliant with ICAO SARPs, airspace design & FUA regulations, and Eurocontrol guidance satisfactory?	
	Segregation of BVLOS UAS operations is currently achieved by Danger Areas or Temporary Segregated Areas in accordance with CAA policy. The sponsor will apply FUA principles by activating by NOTAM only the required segments of the Danger Area complex for the times which it is required.	
2.9	Is the proposed airspace classification stated and justification for that classification acceptable?	N/A
	There is no change to airspace classification.	
2.10	Within the constraints of safety and efficiency, does the airspace classification permit access to as many classes of user as practicable?	N/A
	There is no change to airspace classification.	
2.11	Is there assurance, as far as practicable, against unauthorised incursions? (This is usually done through the classification and promulgation.)	

	The temporary Danger Areas will be established via AIC and activated by NOTAM.	
2.12	Is there a commitment to allow access to all airspace users seeking a transit through controlled airspace as per the classification, or in the event of such a request being denied, a service around the affected area?	N/A
	The temporary Danger Area is being established in Class G airspace.	
2.13	Are appropriate arrangements for transiting aircraft in place in accordance with stated commitments?	
	<p>The majority of the temporary Danger Area structure is situated over the water and it has a maximum altitude of 840ft AMSL. The sponsor's operational impact assessment suggests that as a result of these factors the requirements for aircraft to transit the temporary Danger Area will be minimal. The Danger Area segments have been designed through stakeholder engagement to minimise the impact to aircraft transiting to and from nearby airfields.</p> <p>However, a traffic analysis was not done by the sponsor and the rationale they offered was not sufficient. They also stated that it is unlikely that aircraft would operate within the vertical extent of the temporary Danger Area but under ORS 1496, 5 the CAA does permit aircraft to operate less than 500ft above the ground or water.</p> <p>The sponsor has stated that a SUA Crossing Service will not be provided. They have stated in their engagement material that they can collapse the temporary Danger Area very quickly if necessary but this is not an accurate statement.</p> <p>The sponsor has entered into a LoA with one stakeholder to facilitate emergency entry into the temporary DA. However, there are discrepancies between the ACP submission and the LoA.</p> <p>They have committed to establishing a LoA with HM Coastguard which needs to be updated (discrepancies between submission data and LoA data) and sent to the CAA.</p> <p>Red because they haven't done a traffic analysis and the sponsor has incorrectly stated that they can quickly collapse the DA if needed.</p> <p>With the new airspace it is smaller overall with only one small stub for the take-off/landing site, the entire structure will be active up to 600ftAGL (900FTAMSL at highest point).</p>	



Owing to the nature of the surrounding airspace (class G) and the altitude at which the TDA will be operating, analysis of accurate traffic patterns within the area is a challenge. The sponsor has utilised Plane Finder to look at figures and patterns of ADS-B aircraft in the area over a 12-month period up to 2000ft AMSL. This analysis has provided some clarity of what could be expected with regards to aircraft in the vicinity of the TDA. The sponsor has also looked at a high traffic day during the analysed period, 29<sup>th</sup> August 2024, to ascertain what a busy flight day may entail.



**Figure 8 – Flight Paths 29.08.2024**

This shows that the majority of traffic in the area flies towards the Northwest at Lee-On-Solent Airport and to the South over the Isle of Wight. Unfortunately, it is not possible to ascertain what altitude any of these aircraft are flying at and whether they would likely be impacted by the TDA. Given the low altitude of the TDA, aircraft should be able to route over the top with little impact. No SUACS will be provided, the sponsor states this decision is based on output from previous trials along with engagement with local ATC Services.

**Condition – Sponsor to provide corrected signed copy of the LoAs to the CAA.**

2.14	Are any airspace user group's requirements not met?	
	<p>All airspace user group requirements raised during the engagement process were met. However, the BGA requested additional information on the timings of the Danger Area activation which the sponsor stated would be provided once the ACP was approved. This did not enable the stakeholder to fully understand the potential impact of the proposed airspace.</p> <p>Stakeholders engaged during the first round were re-engaged during the second period allowing for comments on the updated proposal. The outstanding already identified action of LoAs makes this question amber. Once an LoA is agreed and verified for emergency services, all requirements will be met for user groups.</p> <p><b>Condition – Sponsor to provide corrected signed copy of the LoAs to the CAA.</b></p>	
2.15	Is any delegation of ATS justified and acceptable? (If yes, refer to Delegated ATS Procedure).	N/A
	N/A	
2.16	Is the airspace design of sufficient dimensions with regard to expected aircraft navigation performance and manoeuvrability to contain horizontal and vertical flight activity (including holding patterns) and associated protected areas in both radar and non-radar environments?	
	Covered in RPAS OA.	
2.17	Have all safety buffer requirements (or mitigation of these) been identified and described satisfactorily (to be in accordance with the agreed parameters or show acceptable mitigation)? (Refer to buffer policy letter.)	
	In accordance with the <a href="#">CAA policy for the establishment and operation of Special Use Airspace</a> there is no safety buffer requirements as the closest controlled airspace (Southampton CTA D) is greater than 1nm away.	
2.18	Do ATC procedures ensure the maintenance of prescribed separation between traffic inside a new airspace structure and traffic within existing adjacent or other new airspace structures?	N/A

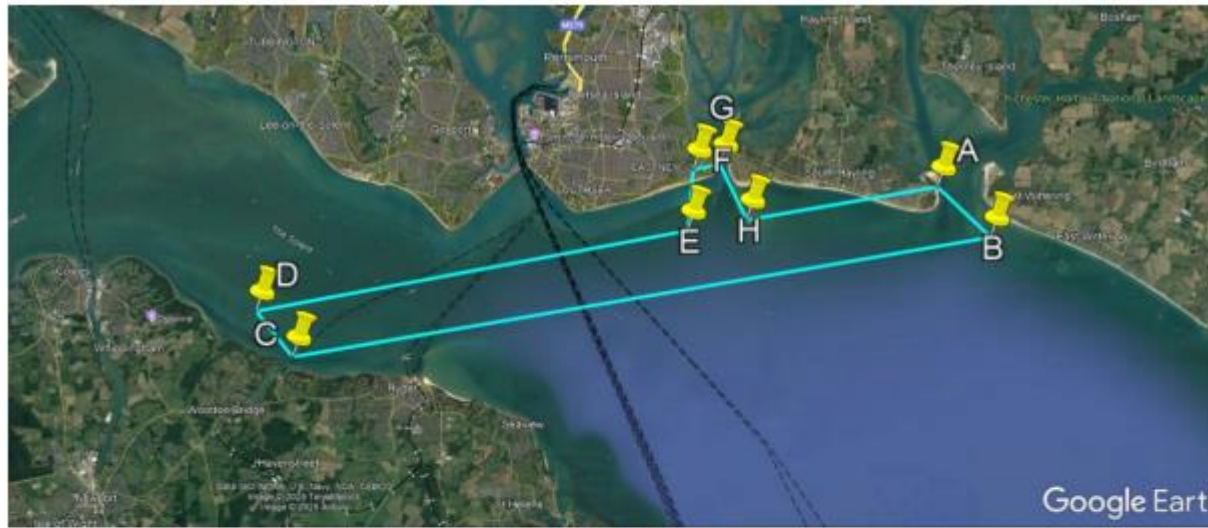
	There are no adjacent airspace structures.	
2.19	Is the airspace structure designed to ensure that adequate and appropriate terrain clearance can be readily applied within and adjacent to the proposed airspace?	
	Covered in RPAS OA.	
2.20	If the new structure lies close to another airspace structure or overlaps an associated airspace structure, have appropriate operating arrangements been agreed?	N/A
	There are no adjacent airspace structures.	
2.21	Where terminal and en-route structures adjoin, is the effective integration of departure and arrival routes achieved?	N/A
	There are no adjacent airspace structures.	

3.	Supporting resources and communications, navigation and surveillance(CNS) infrastructure	Status
3.1	Is the evidence of supporting CNS infrastructure together with availability and contingency procedures complete and acceptable? The following are to be satisfied:	N/A
	<ul style="list-style-type: none"> <li><b>Communication:</b> Is the evidence of communications infrastructure including RT coverage together with availability and contingency procedures complete and acceptable? Has this frequency been agreed with AAA Infrastructure?</li> </ul>	N/A

	<ul style="list-style-type: none"> <li>• <b>Navigation:</b> Is there sufficient accurate navigational guidance based on in-line VOR or NDB or by approved RNAV-derived sources, to contain the aircraft within the route to the published RNP value in accordance with ICAO/ Eurocontrol standards? For example, for nav aids, has coverage assessment been made, such as a DEMETER report, and if so, is it satisfactory?</li> </ul>	N/A
	N/A	
	<ul style="list-style-type: none"> <li>• <b>Surveillance:</b> Radar provision – have radar diagrams been provided, and do they show that the ATS route/airspace structure can be supported?</li> </ul>	N/A
	N/A	
3.2	Where appropriate, are there any indications of the resources to be applied, or a commitment to provide them, in line with current forecast traffic growth acceptable?	N/A
	N/A	

4.	Maps/charts/diagrams	Status
4.1	<p>Is a diagram of the proposed airspace included in the proposal, clearly showing the dimensions and WGS84 co-ordinates?</p> <p>(We would expect sponsors to include clear maps and diagrams of the proposed airspace structure(s) – they do not have to accord with aeronautical cartographical standards (see airspace change guidance), rather they should be clear and unambiguous and reflect precisely the narrative descriptions of the proposals.)</p>	
	<p>A diagram is provided as an overlay on a satellite type image showing the points of each temporary Danger Area. This is supported by a table which includes the WGS84 coordinates. Coords need to be checked to make sure they are correct.</p> <p><a href="#">Co-ordinates verified using ArcGIS.</a></p>	
4.2	Do the charts clearly indicate the proposed airspace change?	

The charts clearly show the geographical location of the proposed temporary Danger Areas using an overlay on a satellite type image.



**Figure 6 - Final TDA Design**

**Table 6 – Details of Final TDA Design**

Point	Latitude	Longitude	Activation Height (AGL)	Activation Altitude (AMSL) <sup>15</sup>
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H	50°46'30"N	001°01'00"W		

4.3	Has the change sponsor identified AIP pages affected by the change proposal and provided a draft amendment?	
	Proposed change will be promulgated by AIC.	
4.4	Has the change sponsor completed the WGS84 spreadsheet and submitted to the CAA for approval?	N/A
	Not required for AIC.	

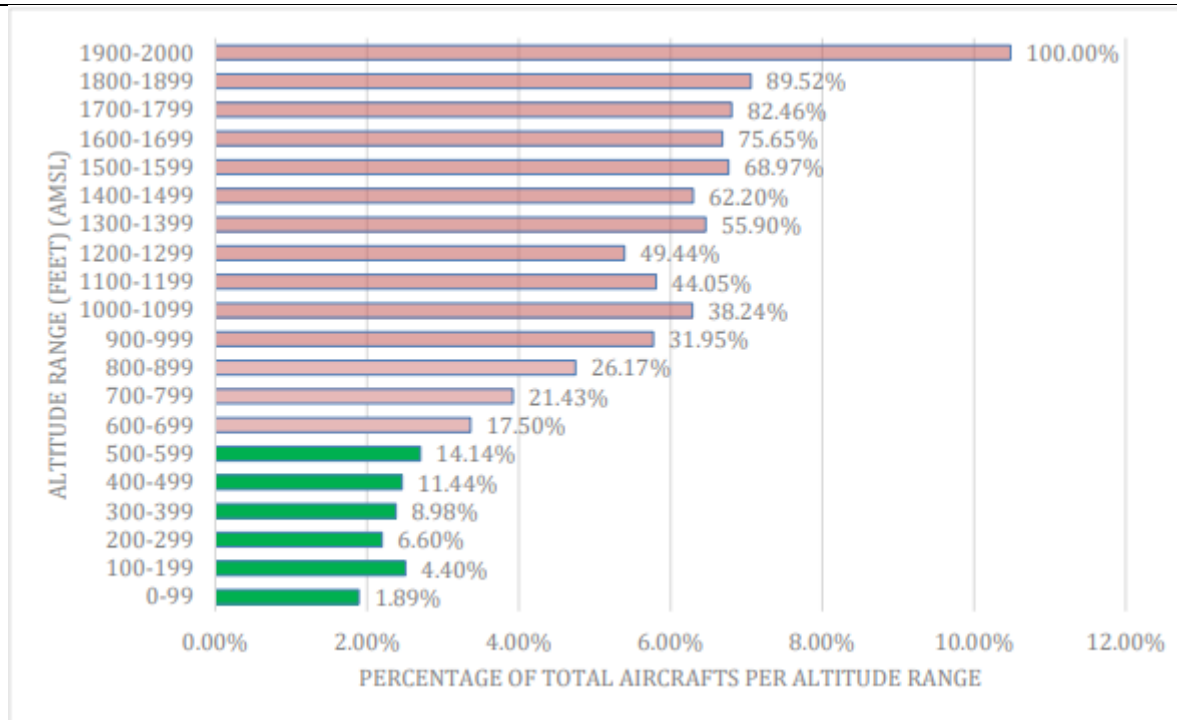
5.	Operational impact	Status
5.1	Is the change sponsor's analysis of the impact of the change on all airspace users, airfields and traffic levels, and evidence of mitigation of the effects of the change on any of these, complete and satisfactory?  Consideration should be given to:	
	a) Impact on IFR General Aviation traffic, on Operational air traffic or on VFR General Aviation traffic flow in or through the area.	
	<p>The sponsor has not presented any traffic analysis stating that accurate flight data is not available due to the low altitude of the proposed temporary Danger Area (600ft AGL; max alt of Danger Area complex is 840ft AMSL). The sponsor has not stated how this rationale has been developed, ie what sources of data have been checked to reach this conclusion. Engagement from Bembridge airfield (engagement document page 25) also claims that the sponsor has failed to understand the types and amount of traffic that will be impacted.</p> <p>The sponsor has also stated that aircraft generally do not operate at or below 600ft AGL, with the exception of aircraft ascending or descending to an airfield. However, the sponsor has not tried to back up their statement through any traffic analysis and the CAA does permit aircraft to operate less than 500ft above the ground or water (ORS 1496, 5).</p> <p>Feedback from the GA Alliance indicated that there was not sufficient information in the engagement material to assess the impacts of the proposed airspace, specifically that the proposed dates\days\times of activations were far too vague. This was addressed by the sponsor by stating that the schedule would be published should the ACP be approved.</p>	

The sponsor has stated that the Danger Area can be collapsed very quickly if necessary, however there is no detail on how this may be achieved. Once active, Danger Areas cannot be quickly deactivated and the only method of obtaining approval to enter an active Danger Area is through a SUACS; which the sponsor has stated will not be provided.

Red because the sponsor's analysis of the impact on other airspace users is not complete as they have not conducted a traffic analysis or presented a suitable rationale to why one wasn't conducted.

Owing to the nature of the area being class G airspace and the proposed TDA having the portion West of the stub being the only area within LARS coverage, it is expected that little accurate radar data would be available. The sponsor has considered data from Plane Finder to gather information about flight operations within the proposed area looking at up to 2000ftAMSL. As per the table below, the total number of moves within the vicinity amounts to 24% within the proposed TDA operating altitude. However, this is not specifically centred on the TDA itself but the general vicinity and as shown in the extract below, the majority of ADS-B aircraft within the area fly outside of the TDA.









**Figure 8 – Flight Paths 29.08.2024**

General VFR traffic would be minimally impacted by the TDA when looking at this data. It is however vital that the sponsor acknowledge that the TDA only be NOTAM'd for the specific periods of operation required rather the entire 0900-1700 period. This will minimise impact to local traffic operations and SAR aircraft both in an emergency and during training. Equally, the NOTAM should be cancelled immediately should operations be completed before of the notified period or be curtailed altogether.

**Recommendation – Sponsor to ensure activation is only for specific periods of flying to minimise operational impact to other airspace users.**

Airports that operate closest to the TDA do not have IFR procedures or facilities. Southampton Airport is the closest IFR capable airport and the TDA does not impact their procedures. Any aircraft flying IFR would most likely need to be flying higher than the TDA in the vicinity to gain radar coverage from Southampton airport, the Portsmouth CTA A is overhead the TDA at FL65+ so would not be impacted.

	b) Impact on VFR Routes.	
	There are no VFR routes depicted in this area.	
	c) Consequential effects on procedures and capacity, i.e. on SIDs, STARs, holds. Details of existing or planned routes and holds.	
	There are no procedures within this portion of Class G.	
	d) Impact on airfields and other specific activities within or adjacent to the proposed airspace.	
	<p>The sponsor engaged with adjacent airfields and the design of the airspace was modified as a result of stakeholder feedback to mitigate the impacts identified by stakeholders.</p> <p>Chichester and District Model Aero Club stated there would be no impact if the temporary Danger Area was only active on weekdays, as is stated by the sponsor.</p>	
	e) Any flight planning restrictions and/ or route requirements.	
	No.	
5.2	Does the change sponsor consultation material reflect the likely operational impact of the change?	
	<p>The original engagement material, sent as an email dated 2 Feb 2024, did not provide a clear description of the proposed airspace. Instead, it makes reference to a previously approved ACP (ACP-2021-002), which established a similar temporary Danger Area in the same location, and describes how it differs from this. No graphical representation or coordinates were provided. The vertical extent of the proposed airspace was communicated as an 'increase in altitude from 400ft to 600ft', however they are referring here to height (AGL) and when converted to altitude (AMSL) it adds 240ft to the vertical extent of the Danger Area in some segments. During engagement they generally refer to just 'ft' and so it is unclear if they are referring to AGL or AMSL. This could have been communicated more clearly.</p> <p>A general description of activation times was provided (five days per week, predominantly in daylight hours) but no specific plan was detailed. Feedback from the General Aviation Alliance stated this lack of detail prevented them from making an accurate assessment of the</p>	

potential impact; the sponsor's response was to state that the schedule of trials would be published should the ACP be approved. The proposed implementation period of the temporary Danger Area was also not included in the engagement material which is important given the time of year can significantly change the potential impact to other airspace users.

Following stakeholder feedback from DAATM, who were unable to provide a response to the original engagement material due to its lack of clarity, the sponsor released an addendum on 20 Feb 2024 which provided some additional information. This update did include a graphical representation of the proposed temporary Danger Area but reference to the vertical extent remained without reference to the datum. The graphical representation was not clearly explained. There are yellow (stubs for launch) and red (segments A, B and C) boxes but the meaning of these was not included. The description of the planned operations includes 'the addition of several location to allow exit and entry to the TDA from designated points allowing for transition from VLOS to BVLOS'. It is unclear whether these 'designated points' refer to locations in the yellow boxes and if so it is also unclear if the yellow boxes are proposed Danger Areas or if they are there for information; under 'operating hours' it states the airspace is split into three portions (A, B and C) which are all red boxes. The final submission includes two of these stubs as temporary Danger Areas, the other were removed. The update does include the proposed period for the airspace (June to November).

The sponsor describes the mitigations in place to minimise the impact to other airspace users such as designing airspace which is as small as practicable and the provision of pre-flight information. However, it describes the proposed trial airspace as 'VFR friendly' but with no explanation as to what that means.

The sponsor also states that they can 'collapse the airspace very quickly if necessary' but again with no further explanation. Once temporary Danger Areas are activated by NOTAM they cannot be deactivated quickly and the only method of gaining approval to enter an active Danger Area is by using an SUA Crossing Service, which they have stated will not be provided.

Overall the engagement material does not provide a clear description of the proposed airspace or activation periods/times, and some of the proposed mitigations are not fully explained or are inaccurate. The use of technical language is sometimes inaccurate and inconsistent. This lack of clarity makes it challenging for stakeholders to understand the likely operational impact.

The second round of engagement clearly displays the proposed area with co-ordinates with references to both height and altitude throughout the document.

Activity is explained in a table on page 44 which is broken down into sorties intended for each week of the trial. Although it is not specifying which activity will take place on a given day and at a given time during the week (this would be subject to significant change due to multiple factors), it is comprehensive enough to give readers an understanding of the intentions on the trial and the intended outcome.

**Table 10 – ACP Trial Plan: May to October 2025**

Week	Trial Number <sup>21</sup>	Purpose and Additional Details
Week commencing: 12/05/2025 Activation period: Monday to Friday 0900 – 1700	1	Testing communications, whilst increasing flight distance incrementally from take-off site until midway across the Solent. Aim of this trial is check communications connection across the entire TDA in preparation for crossing the Solent. Opportunity for multiple short flights within the activation period.
	2	Testing communications, whilst increasing flight distance incrementally from take-off site until midway across the Solent. Aim of this trial is check communications connection across the entire TDA in preparation for crossing the Solent. Opportunity for multiple short flights within the activation period.
	3	Testing communications, whilst increasing flight distance incrementally from take-off site until midway across the Solent. Aim of this trial is check communications connection across the entire TDA in preparation for crossing the Solent. Opportunity for multiple short flights within the activation period.
	4	Testing communications, whilst increasing flight distance incrementally from take-off site until midway across the Solent. Aim of this trial is check communications connection across the entire TDA in preparation for crossing the Solent. Opportunity for multiple short flights within the activation period.
Week commencing: 09/06/2025 Activation period: Monday to Friday 0900 – 1700	5	Single aircraft BVLOS flights across the Solent. The aim of this trial is a full systems test at the usable range for each aircraft type. Opportunity for multiple short flights within the activation period.
	6	Multi aircraft BVLOS flights across the Solent. The aim of this trial is full systems and procedures test for multiple aircraft of the same type. Opportunity for multiple short flights within the activation period.
	7	Multi aircraft BVLOS flights across the Solent. The aim of this trial is full systems and procedures test for multiple aircraft of different types. Opportunity for multiple short flights within the activation period.
Week commencing: 23/06/2025 Activation period: Monday to Friday 0900 – 1700	8	Introduction to multiple operators flying which could include University of Southampton and / or emergency services. Opportunity for multiple short flights within the activation period.
	9	Single aircraft BVLOS flights across the Solent. The aim of this trial is a full systems test at the usable range for each aircraft type. Opportunity for multiple short flights within the activation period.
	10	Multi aircraft BVLOS flights across the Solent. The aim of this trial is full systems and procedures test for multiple aircraft of the same type. Opportunity for multiple short flights within the activation period.
	11	Multi aircraft BVLOS flights across the Solent. The aim of this trial is full systems and procedures test for multiple aircraft of different types. Opportunity for multiple short flights within the activation period.
Week commencing: 14/07/2025 Activation period: Monday to Friday	12	Introduction to multiple operators flying which could include University of Southampton and / or emergency services. Minimum of three return flights within the activation period. Multiple aircraft will participate in each flight.
	13	Single aircraft BVLOS flights across the Solent. The aim of this trial is a full systems test at the usable range for each aircraft type. Minimum of three return flights within the activation period.

Week	Trial Number <sup>21</sup>	Purpose and Additional Details
0900 – 1700	14	Multiple aircraft will participate in each flight.
	15	Multi aircraft BVLOS flights across the Solent. The aim of this trial is full systems and procedures test for multiple aircraft of the same type. Minimum of three return flights within the activation period. Multiple aircraft will participate in each flight.
	16	Multi aircraft BVLOS flights across the Solent. The aim of this trial is full systems and procedures test for multiple aircraft of different types. Minimum of three return flights within the activation period. Multiple aircraft will participate in each flight.
Week commencing: 11/08/2025 Activation period: Monday to Friday 0900 – 1700	17	Introduction to multiple operators flying which could include University of Southampton and / or emergency services. Minimum of three return flights within the activation period. Multiple aircraft will participate in each flight.
	18	Single aircraft BVLOS flights across the Solent. The aim of this trial is a full systems test at the usable range for each aircraft type. Minimum of three return flights within the activation period. Multiple aircraft will participate in each flight.
	19	Multi aircraft BVLOS flights across the Solent. The aim of this trial is full systems and procedures test for multiple aircraft of the same type. Minimum of three return flights within the activation period. Multiple aircraft will participate in each flight.
	20	Multi aircraft BVLOS flights across the Solent. The aim of this trial is full systems and procedures test for multiple aircraft of different types. Minimum of three return flights within the activation period. Multiple aircraft will participate in each flight.

The confusing statement of ‘collapse the airspace very quickly if necessary’ has been address in this second engagement. The size of the TDA has reduced since the end of the second engagement, removing the portions of airspace over the IOW and Chichester Harbour. This further reduces the impact which was of original concern to local residents.

Case study conclusions – to be completed by Airspace Regulator (Technical)	Yes/No
Has the change sponsor met the SARG airspace change proposal requirements and airspace regulatory requirements above?	Yes
<p>In addition to the above, the sponsor has not provided the CAA with a clear explanation of the data and outcomes that are needed in order to prove, or otherwise, that the trial was a success (CAP 1616 Ver 4 para 314).</p> <p>Aims and success criteria are available on page 42 of the submission.</p>	

RECOMMENDATIONS/CONDITIONS/PIR DATA REQUIREMENTS	Yes/No
<p>Are there any Recommendations which the change sponsor <b><u>should try</u></b> to address either before or after implementation (if approved)? If yes, please list them below.</p>	Yes
<p><b><u>GUIDANCE NOTE:</u></b> Recommendations are something that the change sponsor <b><u>should try</u></b> to address either before or after implementation, if indeed the airspace change proposal is approved. They may relate to an area in which the change sponsor is reliant upon a third party to actually come to an agreement and consequently they do not carry the same 'weight' as a Condition.</p> <p><b>Recommendation – Sponsor to ensure activation is only for specific periods of flying to minimise operational impact to other airspace users.</b></p>	
<p>Are there any Condition(s) which the change sponsor <b><u>must fulfil</u></b> either before or after implementation (if approved)? If yes, please list them below.</p>	Yes
<p><b><u>GUIDANCE NOTE:</u></b> Conditions are something that the change sponsor <b><u>must fulfil</u></b> either before or after implementation, if indeed the airspace change proposal is approved. If their proposal is approved, change sponsors <b><u>must observe</u></b> any condition(s) contained within the regulatory decision; failure to do so <b><u>will usually</u></b> result in the approval being revoked. Conditions should specify the consequence of failing to meet that condition, whether that be revoking the ACP or some alternative.</p> <p><b>Condition – Sponsor to provide corrected signed copy of the LoAs (ROAs) to the CAA.</b></p> <p>Current ROAs have incorrect date and references to areas no longer within the TDA structure. These must be rectified and new, signed agreements forwarded to the CAA prior to trial commencement.</p>	
<p>Are there any specific requirements in terms of the data to be collected by the change sponsor for the Post Implementation Review (if approved)? If yes, please list them below.</p>	No
<p><b><u>GUIDANCE NOTE:</u></b> PIR data requirements concerns any specific data which the change sponsor <b><u>must</u></b> collate post-implementation, if indeed the airspace change proposal is approved. Please use this section to list any such requirements so that they can be captured in the regulatory decision accordingly.</p>	



## General summary





The purpose of this trial is to build experience of BVLOS aircraft operating safely within airspace, contributing to build evidence and experience towards BVLOS operations in non-segregated airspace.

The trial aims to:

- Perform live flying trials with increasing complexity of flying from single operator / aircraft to multiple operators / aircraft crossing the trial airspace and using Visual Line of Sight (VLOS) entry and exit to the main TDA. This scenario enables us to simulate safe approaches and departures into and from the TDA.
- Gather operational evidence testing the available detect and avoid (DAA) solutions to support the CAA's approval of this capability for routine operations.
- Test and develop operational procedures for multiple aircraft type and / or multiple operators who could all have different operating procedures and performance capabilities, whilst capturing lessons learned and enhancing risk mitigation throughout the trials.
- Introduce a network of sensors, placed strategically across the area to receive signals from aircraft, inferring location. Allowing for situational awareness of cooperative and noncooperative air traffic in the Solent region, whilst testing of sensors to determine network density for each sensor type.
- Test the capabilities of a 4-dimensional (latitude, longitude, height, and speed) flight booking system, alongside the sensor network. It should be noted that this is not being used to provide access to the TDA, and will only be used to record data, which can then be cross checked to confirm its validity.

The proposed operating hours of weekdays 0900-1700 offers plenty of opportunity for the trial to be successful. The NOTAM system, if used effectively, will offer the best chance of minimising impact to pilots wishing to operate in the area. The trial would commence May 2025 for 6 months.

Comments and observations
<p>Overall, the second round of engagement has afforded the opportunity to address operational issues originally identified during the first submission. With the further reduction in size of the TDA post engagement, perceived impact on the local population and airspace users has significantly reduced.</p> <p>The condition stated above must be fulfilled prior to the trial's commencement.</p> <p>Having seen drafts of the LoAs, a recommendation to approve this trial is given.</p>

Operational assessment sign-off	Name	Signature	Date
Operational assessment completed by Airspace Regulator (Technical)			28 Feb 25
Principal Airspace Regulator comment / Decision	Name	Signature	Date
Operational assessment conclusions approved by Principal Airspace Regulator			10 Mar 25



Principal Airspace Regulator Comments and Decision:

Noting the condition and recommendation detailed above, this ACP is approved.