

CAA Decision Log – Airspace Trial

Airspace Trial Change Proposal Title	Solent Transport TDA
Airspace Trial Change Proposal Reference	ACP-2022-106
Change Sponsor	Skylift UAV Ltd
AIS (AIC/SUP) Submission Target Date	01 May 2025
CAA Decision Target Date	28 Feb 2025

Instructions

In providing a response to each question and/or status, the following colour coding should be used:

- COMPLIANT/NOT APPLICABLE
- NOT COMPLIANT/ACTION REQUIRED
- ISSUE/CONCERN TO HIGHLIGHT

Executive 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.

PART A – Airspace Change Process

A.1	Airspace Change Portal
A.1.1	
A.2	CAA SharePoint site
A.2.1	
A.3	Chronology
A.3.1	Version 1 of the Statement of Need was submitted to the CAA on 23 Dec 2022 and proposed to follow the ‘temporary’ airspace change process. An Assessment Meeting was held on 14 Mar 2023 after which the CAA confirmed that the ‘trial’ airspace change process would be more appropriate for the ACP because it proposed to gather data for new technology and operational procedures to support the transition to non-segregated BVLOS operations. Version 2 of the Statement of Need was submitted on 13 May 2024 amending it from a ‘temporary’ to a ‘trial’.

	<p>The draft minutes of the Assessment Meeting were not submitted to the CAA until 4 May 2024 and were uploaded to the ACP Portal on 26 May 2023. They were amended and re-uploaded to the ACP Portal on 25 Dec 23 as the sponsor identified an incorrect date in the minutes; there were no other changes to the minutes.</p> <p>CAP 1616 Version 5 became effective on 18 March 2024. However, because the Assessment Meeting had taken place before this point the ACP continued to progress using the Version 4 requirements.</p> <p>The sponsor conducted targeted engagement with stakeholders during the period 2 Feb 24 – 1 March 24. As a result of feedback from stakeholders, additional information was distributed on 20 Feb 24 and the engagement period was extended slightly to finish on the 4 Mar 24.</p> <p>The sponsor and the CAA were contacted by a stakeholder lodging objections to the ACP for numerous reasons and stating that legal action may be taken. As a result of this, the sponsor decided to delay the final submission by approx. one month. It was submitted to the CAA on 12 Apr 24 and uploaded to the ACP Portal on the same day.</p> <p>Following this submission the CAA was unable to make a decision due to insufficient information in a number of areas. The ACP also received a strong objection from a non-aviation stakeholder which resulted in a letter being sent from OGC.</p> <p>In May 2024 a meeting was held with the sponsor to discuss feedback provided by the CAA on their submission. A new timeline was expected following this meeting.</p> <p>New Technical Regulator/Account Manager took over in June 2024. Multiple emails were sent through July, August and September requesting an update on the sponsor's intentions.</p> <p>In October 2024 a new timeline was agreed. In November 2024 new engagement material was sent to the CAA for feedback prior to engagement taking place.</p> <p>New submission received as expected on 30th January 2025.</p>	
A.4	Are there any additional process requirements of the Civil Aviation Authority (Air Navigation) Directions 2023 (the “Air Navigation Directions”) and/or the Air Navigation Guidance 2017 which apply to this airspace change, and have they been complied with?	No
A 4.1		

PART B – Airspace Change Process – STAGE 5			
B.1	Subject Matter Expert (SME) Regulatory Assessments NOTE: this captures RAG status only – full details contained within each of assessment (hyperlinks inserted below)		
ATM Safety	NOT APPLICABLE	Environmental	COMPLETE
HRA screening criteria	COMPLETE	Instrument Flight Procedure	NOT APPLICABLE
Engagement / Consultation	COMPLETE	Operational	COMPLETE
B.1.1	Corrected LoAs to be sighted by CAA personnel.		
B.2	Other Relevant Documents (title and hyperlinks to be inserted)		
B.3	Has the relevant legal and policy framework to the airspace change process been taken into account, including: <ul style="list-style-type: none"> the Air Navigation Directions; the Airspace Modernisation Strategy; section 70 of the Transport Act 2000; the Air Navigation Guidance 2017; and CAP 1616 and associated publications? 		Y
B.4	CAA consideration of whether the proposal is in accordance with the Airspace Modernisation Strategy (Air Navigation Directions, direction 5(1)).		



	<p>NOTE: the left column captures RAG status only and the right column captures the rationale – full details will be contained within the SME Regulatory Assessments. Reference should be made to the AMS characteristics (CAP 1616f, 6.61). For more information on the AMS strategic objectives, see <i>Airspace Modernisation Strategy 2023-2040 Part 1: Strategic Objectives and Enablers</i> (CAP 1711).</p>
Safety	The sponsor has submitted a Safety Case to the CAA RPAS unit which has been assessed as safe and an operational authorisation has been issued for the UAS that will operate in the temporary Danger Area. The size of the DA has been assessed as sufficient to safely contain the planned BVLOS RPAS operations.
Integration of diverse airspace users	The establishment of a temporary Danger Area will prevent crewed aviation from accessing the airspace while it is active. Whilst the airspace itself will not be able to accommodate a mix of crewed and uncrewed aircraft, it is gathering data and operational knowledge that may lead to the facilitation of improved integration. The sponsor has put in place mitigations to flexibly use the airspace by using a segmented design and only activating the segments they need by NOTAM.
Simplification of airspace system	The introduction of a temporary Danger Area inevitably adds an element of complexity to the airspace system. However, it is the accepted means of enabling BVLOS UAS operations and in the longer term the trial itself should help work towards non-segregated BVLOS UAS operations which will simplify the airspace system. The lateral design of the temporary Danger Area is the least complex it can be in order to achieve the aims of the trial with one height activation for the entire TDA.
Environmental sustainability	<p>The AMS environmental sustainability strategic objective states that: “environmental sustainability will be an overarching principle applied through all airspace modernisation activities. Airspace modernisation should deliver the Government’s key environmental objectives with respect to air navigation as set out in the Air Navigation Guidance.”</p> <p>The environmental impact requiring assessment in line with the Air Navigation Guidance 2017 for trial airspace change proposals is noise. The implementation of the proposed temporary danger area is not anticipated to result in either an increase, or decrease, in terms of the number of people significantly affected by adverse impacts from aircraft noise as defined in the Air Navigation Guidance 2017, nor lead to any significant changes to global emissions and local air quality impacts. Consequently, this trial ACP is consistent with the Government’s environmental objectives.</p>
B.5	CAA consideration of factors material to our decision whether to approve the change (section 70, Transport Act 2000).


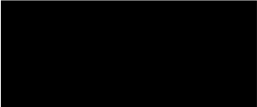
	<p>NOTE: the left column captures RAG status only and the right column captures a summary of the rationale – full details will be contained within the SME Regulatory Assessments. Reference should be made to the Section 70 characteristics (CAP 1616f, 6.80).</p>
<p>Maintain a high standard of safety in the provision of air traffic services</p> <p>section 70(1)(a)</p>	<p>The BVLOS UAS activity will take place in accordance with the Operational Authorisation granted by the CAA RPAS unit on date TBC. A LoA has been drafted with the operators of Hampshire & IOW Air Ambulance and HM Coastguard to minimise disruption to their operations by deconflicting them the BVLOS activity in an emergency.</p>
<p>Secure the most efficient use of airspace consistent with the safe operation of aircraft and the expeditious flow of air traffic</p> <p>section 70(2)(a)</p>	<p>The temporary Danger Area has been through various designs with the final design consisting of one rectangular area and a small stub. The entire TDA will be activate by NOTAM up to 600ft AG/900FT AMSL which is the minimum necessary to achieve the aims and objectives of the trial and will minimise the impact on other airspace users as much as practicable.</p>
<p>Satisfy requirements of operators and owners of all classes of aircraft</p> <p>section 70(2)(b)</p>	<p>First round of engagement -The sponsor engaged with aviation stakeholders over a four week-long engagement period and resulted in amendments to the design of the airspace to minimise the impact to aircraft operating to/from Thorney Island and the Barton Estate airstrip. An LoA will be established with HM Coastguard to minimise impact to their operations and by activating the airspace only on weekdays, a local model flying club will be able to continue their activity.</p> <p>Second round of engagement – Design of the TDA was adapted to minimise impact on non-aviation stakeholders. Post engagement this was further reduced to remove all elements over land, bar the take off and landing site. A LoA with Bristow Group and BAE is still to be finalised.</p>
<p>Take account of the interests of any other person (other than an operator or owner of an aircraft) in relation to the use of any particular airspace or the use of airspace generally</p> <p>section 70(2)(c)</p>	<p>The CAA RPAS team have provided an Operational Authorisation which ensures safe operation of the RPAS and that third party risks are reduced to an acceptable level.</p> <p>For Airspace Trials, the Government requires an assessment of the likely noise impacts. The noise assessment is used to inform the level of engagement required with potentially impacted stakeholders, and to portray the anticipated impacts to the affected communities and their representatives. The change sponsor did not identify any “non-involved” stakeholders on the ground that will be exposed to noise levels above the 65 dBA LASmax (0700-2300 Day-time) threshold set for the purposes of informing affected communities and their representatives.</p>

Take into account the Secretary of State's guidance relating to spaceflight activities section 70(2)(ca)	N/A – there are no spaceflight activities to take into consideration.
Take into account the Secretary of State's guidance on environmental objectives section 70(2)(d)	<p>The Government's environmental objectives, as listed in the Air Navigation Guidance 2017 are:</p> <ul style="list-style-type: none"> a. limit and, where possible, reduce the number of people in the UK significantly affected by adverse impacts from aircraft noise; b. ensure that the aviation sector makes a significant and cost-effective contribution towards reducing global emissions; and c. minimise local air quality emissions and in particular ensure that the UK complies with its international obligations on air quality. <p>The Government's environmental objectives listed in the ANG2017 relate to reducing the noise, global emissions and air quality impacts resulting from aviation. The impacts resulting from this trial, in terms of noise, emissions and local air quality, are anticipated to be short term and negligible. Consequently, this trial ACP is consistent with the Government's environmental objectives.</p>
Facilitate the integrated operation of air traffic services provided by or on behalf of the armed forces of the Crown and other air traffic services section 70(2)(e)	N/A – the trial is not required to facilitate the operation of air traffic services. Air traffic services will continue to be provided when the temporary Dangers Areas are active as they would for any other Danger Area. Nearby air traffic service providers were engaged with during the engagement period and no concerns were raised.
Take account of the interests of national security section 70(2)(f)	The sponsor engaged with the MOD through DAATM. The final TDA design no longer incorporates operations in the vicinity of Thorney Island. HMS Queen Elizabeth raised that consideration should be taken to remain clear of any large vessel both physically and to avoid any SHIPHAZ such as those emitted from transmitters.
Take account of any international obligations notified to the CAA by the Secretary of	No such international obligations have been notified to the CAA under section 70(2)(g) of Transport Act 2000.

State section 70(2)(g)	
B.6	<p>Are there any other associated publications relevant to the proposal and, if so, have the requirements of those publications been met?</p> <p><u>NOTE</u>: associated publications include Airspace Policy Statements listed here.</p>
	Y
B.6.1	As the ACP is establishing temporary Danger Areas, the CAA's policy for the establishment and operation of Special Use Airspace must be considered. The temporary Danger Areas have been designed, in accordance with the design principles listed in this document, to be as small as practicable and only activated when required to facilitate BVLOS UAS operations.
B.7	<p>Conclusions in respect of requirement to ensure that the amount of controlled airspace is the minimum required to maintain a high standard of air safety and, subject to overriding national security or defence requirements, that the needs of all airspace users is reflected on an equitable basis.</p> <p><u>NOTE</u>: this section only applies if the CAA is classifying or amending the classification of UK airspace.</p>
B.7.1	N/A – no change in classification of airspace.

PART C – Stage 5 Recommendation		
C.1	Taking the above information into account, what is your recommendation to the decision-maker for this proposal?	
C.1.1	The second round of engagement has addressed the concerns and inaccuracies from the original submission. With the final TDA design being further reduced the impact on local population, airspace users and wildlife is reduced significantly. All SMEs agree the trial should be approved.	
C.2	Are there any Recommendations and/or Conditions (and or post-trial data requirements) for the change sponsor to address prior to commencing the trial (if approved)?	Y
C.2.1	<p>Recommendation – Sponsor to ensure activation is only for specific periods of flying to minimise operational impact to other airspace users.</p> <p>Condition – Sponsor to provide corrected signed copy of the LoAs (ROAs) to the CAA. 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>Condition – Lines of communication with MoD. The sponsor is required to set up channels of communication with the MoD via DAATM to ensure pre-tactical deconfliction and safe sharing of the airspace in the event of military exercises and aviation activity requiring use of the TDA airspace and submit evidence to the CAA that arrangements have been agreed.</p>	
C.2.2	<p>Post-Trial –</p> <p>The sponsor is required to collate, monitor, and report to the CAA on stakeholder feedback received during the period of the Trial. The CAA would welcome confirmation on the level and contents of any stakeholder feedback received on a two-weekly basis throughout the duration of the Trial.</p> <p>The sponsor must notify the CAA at the end of the trial airspace change if any environmental related complaints were received</p>	Y

C.3	Are any other consents and approvals needed in order to permit the intended operation (title and hyperlinks to be inserted)?		
C.4	Are there any other comments/observations for the decision maker?		N
C.4.1	<i>Use this section to provide a short summary (by numbers and themes) of any correspondence that we have received directly in relation to the airspace change proposal. Relevant data can be obtained from the Airspace Specialist (Correspondence). Insert additional narrative as required.</i>		
C.5	Regulator's Signature		
Technical Regulator / Account Manager			05/03/2025

PART D – Final Regulatory Decision – Comment/Approval			
[Delete signatory rows below dependent on Decision Maker]			
Airspace Regulation Principal comments and recommendation:			
Noting the conditions and recommendations, this ACP is approved.			
Airspace Regulation Principal			10/03/2025