

CAA Targeted Engagement or Consultation Assessment – Temporary Airspace Changes

Title of airspace change proposal	Solent Transport Temporary Danger Area Trial
Change sponsor	Skylift UAV Ltd.
Project reference	ACP 2022 - 106
Case study commencement date	First assessment 25 April 2024 Assessment updated February 2025 on re-submission
Case study report as at	First assessment 02 May 2024 Second assessment 4 March 2025
<p><i>Instructions</i></p> <p>In providing a response for each question, please ensure that the 'status' column is completed using the following options:</p> <ul style="list-style-type: none"> • YES • NO • PARTIALLY • N/A <p>To aid the SARG Lead it may be useful that each question is also highlighted accordingly to illustrate what is:</p> <p>resolved YES not resolved PARTIALLY not compliant NO</p>	

Targeted Engagement (or Consultation) Assessment		
1	Has the change sponsor identified the right audience(s) and provided a rationale for selecting them?	Yes
	<p>The stakeholder engagement requirement for a trial is outlined at para 317, CAP 1616, namely that targeted engagement must have been carried out with aviation stakeholders, that is airspace users, air navigation service providers (ANSPs) and airports.</p> <p>First period of engagement February to March 2024</p> <p>For the formal engagement period conducted 2 February 2024 to 1 March 2024, the sponsor identified stakeholders by using the National Air Traffic Management Advisory Committee (NATMAC) list, deciding to engage with those members on the list who operate in the vicinity of the proposed Trial or who could have a specific interest in the trial. The sponsor has provided acceptable rationale for excluding particular members within the Stakeholder List Appendix to their Stage 4 submission. Other stakeholders were engaged with as the trial could have a potential impact on their</p>	

operations due to geographical proximity.

The following groups of stakeholders were engaged with:

- Airspace users including NATMAC members, Ministry of Defence (MoD) via Defence Airspace and Air Traffic Management (DAATM), Chichester and District Model Aero Club, Hampshire and Isle of Wight (IoW) Air Ambulance, National Police Air Service (NPAS), PDG Helicopters and HM Coastguard.
- ANSPs including NATS and Southampton Airport Air Traffic Control (ATC).
- Airports including Bembridge Airport, Chichester/Goodwood Airport, Fleetlands Heliport, IoW Airport Sandown and Lee-on-Solent Airport.

From the outset, although not required to by the CAP 1616 process, the sponsor engaged with the following non-aviation stakeholders:

- Environmental organisations and local stakeholders including Chichester Harbour Conservancy, the Royal Society for the Protection of Birds (RSPB) Langstone Harbour and Portsmouth Harbour.

The sponsor engaged with additional stakeholders during the engagement period, i.e., non-aviation stakeholders who the sponsor became aware of and then contacted or stakeholders who provided feedback but had not been initially contacted by the sponsor. These stakeholders were:

- Barton Estate
- Barton Estate Association
- Estates Ltd.
- Hampshire and Isle of Wight (IoW) Wildlife Trust
- Kings Quay Nature Reserve

During engagement activity, the sponsor received feedback from the owners of Kings Quay Nature Reserve. They informed the sponsor that they should be engaging with: Natural England, the Hampshire and IoW Wildlife Trust, the IoW Council Area of Outstanding Natural Beauty (AONB), Mr Bob Seely MP and the Royal Society for the Protection of Birds (RSPB). As can be seen from the stakeholder groups above, the sponsor added the Hampshire and IoW Wildlife Trust and Kings Quay Nature Reserve to their stakeholder list and the RSPB were already being targeted as a stakeholder. There is no evidence to show that the sponsor engaged with the remainder of the stakeholders suggested. It has not been possible to establish why the sponsor decided to add two of the suggested stakeholders to their list, but none of the others.

The sponsor is required to add Natural England, and other suggested stakeholders (not already added) to their stakeholder list (please see action below Qu.8

	<p>Update February 2025 re-submission</p> <p>For their second formal engagement period conducted 22 November 2024 to 22 December 2024, the sponsor engaged with:</p> <ul style="list-style-type: none"> • All those stakeholders who had been contacted in the first engagement round. This included those on the stakeholder list from the outset and those added during the first round, both aviation and non-aviation, as set out above. • New stakeholders added for the second engagement round. Appendix 9 Stakeholder List shows which stakeholders were added and in some instances the reasons for their addition. These were Bristow Helicopters Ltd., Farnborough Airport, HM Prison Isle of Wight (due to proximity of TDA to take-off/landing site in Stub H), Natural England (sites overflown by proposed TDA and the sponsor stated that adding them is reflective of inclusion of the RSPB) and two individuals. <p>The sponsor has provided acceptable rationale (Table 12 Solent Transport TDA: Stage 4 Airspace Trial) for not adding some NATMAC members and for not adding some stakeholders that were suggested by respondents during the first engagement round. This approach was agreed with the CAA before the sponsor conducted their second engagement period. The following stakeholders were excluded:</p> <ul style="list-style-type: none"> • NATMAC members including Isle of Man CAA, British Airways and BAE Systems who do not operate within the vicinity of the trial or have a specific interest based on their area of work. • Suggested local residents, parish councils and the local constituency MP, as the CAP 1616 para 317 requirement is to engage with aviation stakeholders. • The IoW AONB, as IoW Council are co-members of Solent Transport rather than separate stakeholders and AONBs are managed by Natural England who were added for the second engagement round. • National Grid Electricity Distribution (NGET) being out of scope as they provide electricity in East and West Midlands, the Southwest and Wales.
2	<p>Has the change sponsor explained the engagement (or consultation) methodology / approach used?</p> <p style="text-align: right;">Yes</p>
	<p>First period of engagement February to March 2024</p> <p>The sponsor conducted one formal round of engagement from February to March 2024), circulating an email to targeted stakeholders to launch their engagement activity. The explanation for this approach is that this was considered sufficient and appropriate as all targeted stakeholders regularly use emails.</p> <p>In addition, the sponsor has provided a table (Table 7) outlining ad hoc engagement activities conducted between 4 January 2024 and 12 March 2024. This table shows that the sponsor met with NATS Southampton Air Traffic Control (ATC) prior to formal engagement commencing to enable Southampton ATC to consider the TDA in line with the CAA's Buffer Policy. During the engagement period, the sponsor met with NATS Southampton ATC, Consortiq, Barton Estate and Lee-on-Solent Airport. The focus of these meetings was primarily to provide background information, highlight key elements of the proposal and assist with understanding it.</p>

	<p>A reminder notification was issued to stakeholders on 20 February 2024, together with an addendum of material, further to requests for more detail and clarity on what was being proposed.</p> <p>By the closing date of the engagement period, the sponsor had not received a response from a key targeted stakeholder (Lee-on-Solent Airport) and so they were contacted directly.</p> <p>Update February 2025 re-submission</p> <p>A Second period of engagement was conducted from November to December 2024 to address the CAA requirement for further engagement to take place to address omissions/lack of clarity and detail in the engagement materials and to address the content of CAA Clarification questions. The sponsor emailed their stakeholders and invited them to provide feedback via Microsoft forms. This method was chosen as it does not require respondents to have a subscription or software other an internet browser and so it was considered accessible to all stakeholders.</p> <p>During the engagement period, the sponsor emailed Chichester Harbour Conservancy and the Royal Society for the Protection of Birds in response to their concerns regarding the wildlife sensitive areas of Chichester Harbour.</p> <p>Those who had not responded were issued with a prompt notification on 4 December 2024 and a final reminder notification on 16 December 2024, all by email. A technical issue, with the issue of the final reminder email, resulted in a further final reminder notification being issued on 17 December 2024.</p>	
3	What materials have been used by the change sponsor during the targeted engagement (or consultation)?	
	<p>First period of engagement February to March 2024</p> <p>The requirements for provision of engagement material are outlined in paragraph 317, CAP 1616, namely that the sponsor is required to engage to establish that the trial will be safe and operationally viable. The sponsor did not share their materials with the CAA for comment in advance of commencing engagement.</p> <p>The sponsor's engagement material was contained within their email to stakeholders sent on 2 February 2024. It comprised:</p> <ul style="list-style-type: none"> • A brief introduction to the proposed trial activity to conduct Beyond Visual Line of Sight (BVLOS) demonstration flights outside of segregated airspace. • A reference to the sponsor's previous ACP 2021 – 002 and similar TDAs being used for both ACPs with a list of differences applicable to this ACP 2022 – 106 together with a link to all documentation on the airspace change 	

<p>portal associated with this ACP. No chart demonstrating the proposed airspace was provided to assist stakeholders in their understanding of the proposal.</p> <ul style="list-style-type: none"> • A reference to the availability of this proposal's statement of need and provision of a link to gain access to it. • An explanation of mitigations proposed to minimise impact on other airspace users while avoiding overflight of inhabited areas where possible. • Proposed operational details including expected operating hours (5 days per week), times of operation (predominantly in daylight hours), arrangements for activation (via Notice to Aviation (NOTAM) and numbers of flights (4 return flights per day). • A request for feedback to be submitted via a feedback form providing a free-text field for responses. <p>In this first circulation of engagement material, the sponsor did not clearly articulate what was proposed. Their decision to provide materials which referred to a previous ACP, without providing a link to that other ACP, and pointing out the differences in the two proposals resulted in requests to provide clarification. For example, DAATM informed the sponsor that they could not provide an accurate response as the amendments referred to were not easy to assimilate and were confusing when compared with the information referred to on the portal and also that the only airspace chart seemed to be for a previous TDA airspace proposal from a stage 1 assessment meeting presentation.</p> <p>The sponsor responded to this feedback by circulating some additional information on 20 February 2024. This addendum document comprised:</p> <ul style="list-style-type: none"> • Provision of a link to the previous ACP referenced (ACP 2021 – 002) together with a brief explanation of what that trial involved, namely the flying of dry medication over the Solent direct from Thorney Island to a field next to St. Mary's Hospital. The trial operated from May to July 2022. • An image of the proposed airspace for this ACP 2022 – 106. It shows the proposed TDA split into 3 segments with 4 stubs. Although the sponsor explained in the text that the segments were A, B and C, these were not marked on the chart illustrating the TDA. • Additional information including the proposed operating of multiple aircraft simultaneously, increase in altitude from 400 ft to 600 ft, the addition of stubs to allow Visual Line of Sight (VLOS) entry and exit to the TDA and removal of a 3-mile buffer from the previous ACP 2021 – 002 surrounding St. Mary's Hospital to remove the need for the final approach to be under VLOS rules. • An explanation of the aims of the trial • Proposed operating timetable, namely from June to November 2024 • The sponsor planned to activate 1,2 or all 3 of the segments per activity to minimise impact. The sponsor stated 	
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	<p>they anticipated there being 4 return flights per day during the week, but not every week with flights to primarily happen during daylight hours and the TDA expected to be active 5 days' per week.</p> <p>The sponsor updated stakeholders after the engagement period had ended, on 3 April 2024. The following information was provided:</p> <ul style="list-style-type: none"> • A chart showing the updated airspace design based on engagement feedback. No explanatory text was provided to assist stakeholders in identifying the changes made to the design. • The co-ordinates for segments A, B and C together with the co-ordinates for 2 remaining stubs, the Fort Stub and Hospital Stub. <p>The sponsor has stated that since the April update to stakeholders, the TDA has had to be widened, based on safety/operational advice from the CAA.</p> <p>Update February 2025 re-submission</p> <p>On reviewing the sponsor's first submission, the CAA issued a list of items that required more detail to be provided for stakeholders. Each item and how the sponsor responded to it in their November/December 2024 engagement material is set out below:</p> <ul style="list-style-type: none"> • <i>Clarity and more detail on the stubs specifically regarding the 1st and 4th stubs and the purpose of the stubs</i> – the sponsor has provided detail on each of the stubs and how and why they have changed/been removed, as applicable. The purpose of the stubs has been explained and 2 charts provided to show how the design and position of the stubs has evolved. • <i>More detail on why the TDA was widened on CAA safety/operational advice</i> – the sponsor has explained that the safety concern was regarding the TDA breadth around C1/C6. The design was considered too narrow when considering the need for a safety buffer, a contingency area, avoiding populations and accommodating an operating area within the TDA. • <i>Request for detail and illustrative charts to show how the TDA had been widened and the sections this applied to</i> – the text states that C1/C6 had been narrowed on account of stakeholder feedback to avoid overflying Barton Estate's airstrip and Estate Ltd.'s property. TDA C has been widened with an explanation that although wider than the 2nd iteration, it is still narrower than the original proposal for TDA C. Figure 3 chart illustrates the changes made to TDA C. • <i>Inconsistency to be addressed regarding activation plans, whether predominantly in daylight or within daylight hours</i> – activation is planned to be between 0900 and 1700 with the trial plan showing plans for week 	
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	<p>commencing 12 May 2025 until and including week commencing 22 September 2025. References to daylight have been removed.</p> <ul style="list-style-type: none"> • <i>Detail to be provided on specific type of aircraft to be used</i> – the trial plan contained within the November/December 2024 engagement material includes a list of 5 possible UAS types to be used: Skylift V23, Flying Basket FB23, DJI FLYCART 30, HD-606 and PW ORCA. No other information on the characteristics, weight etc. of each of these UAVs were provided to stakeholders. However, spot noise metrics for two UAS were assessed using CAP 1616i guidance: the V23 UAS which the sponsor expects to be the most frequently used UAS within the trial, and the FB3 UAS which is expected to be the loudest. The sponsor presented their findings within the engagement material. • <i>Explanation why the sponsor has concluded that the widening of the TDA will result in no significant impact on new stakeholders overflown or other impacts compared to those engaged upon</i> - The sponsor has stated that the difference between the 2nd and final TDA is negligible but mitigates against the safety concern whilst responding to feedback. <p>As well as addressing the items listed above, the November/December 2024 engagement materials included:</p> <ul style="list-style-type: none"> • the aims for the trial and an explanation that re-engagement was to address CAA clarification questions • a summary of the reasons for changing the operational dates together with the proposed new activation timeline from May to October 2025. • A description, textual and in charts, showing how the evolving of the design from the original proposal comprising TDAs A, B and C with 4 unlabelled stubs to the 2nd engagement proposal comprising TDAs A, B and C with 2 stubs F & H. • A table of expected operating hours in 7 weeks over the 6-month trial period. The table included a list of possible UAS types to be used in the course of each weekly activation. • Impact assessments on other airspace users, noise, air quality and fuel burn. • An invitation to submit feedback via a Microsoft forms link and a glossary of terms. 	
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>First period of engagement February to March 2024</p> <p>The sponsor conducted the following period of formal engagement:</p> <p>Start date: 2 February 2024</p>	

	<p>End date: 1 March 2024 Duration: 4 weeks</p> <p>The sponsor has stated that they considered 4 weeks to be proportional to the size and scope of the ACP, TDA volume and impacted stakeholders.</p> <p>On 20 February 2024, the sponsor circulated an addendum to stakeholders following requests to clarify information contained within the original engagement materials. At the same time, the sponsor extended the engagement period by 3-days, although the email communication issued did not reference an extension. It simply provided the new engagement period closure date. This does not demonstrate a particularly transparent approach.</p> <p>The General Aviation Alliance (GAA) informed the sponsor on 21 March 2024 that they had not been engaged, although the sponsor states that their records showed they were included on the email circulation list. The GAA requested further time to respond. A response was received from the GAA on 4 April 2023, after the engagement period had closed. This response was included within the sponsor's analysis of all feedback.</p> <p>Extension: 3 days Revised end date: 4 March 2024 Duration: 4 weeks and 3 days.</p> <p>The sponsor has not provided explanation as to what factor(s) were considered in deciding to extend the engagement period or why the period of 3-days was chosen.</p> <p>Within any future re-submission to the CAA the sponsor is required to:</p> <ol style="list-style-type: none"> 1. Provide more robust rationale to support the 4-week period of engagement period initially allowed for stakeholder responses. 2. Provide rationale for the length chosen of a 3-day extension to the engagement period and the factors that were considered in making the decision to extend for that duration. <p>Update February 2025 re-submission The sponsor's response to items 1 and 2 above are as follows:</p> <ol style="list-style-type: none"> 1. Provide more robust rationale to support the 4-week period of engagement period initially allowed for stakeholder responses – Having conducted a second period of engagement in November/December 2024, the sponsor has provided a rationale that applies to both engagement periods. This is outlined below.
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	<p>2. Provide rationale for the length chosen of a 3-day extension to the engagement period and the factors that were considered in making the decision to extend for that duration – The sponsor has explained that the 3-day extension was not intentional. The original stakeholder email stated that the engagement period closed on 1 March, however the supplementary email stated 4 March. The sponsor adhered to the latter date for continuity.</p> <p>Second period of engagement 2025</p> <p>At the direction of the CAA, the sponsor re-engaged with their stakeholders as follows:</p> <p>Start date: 22 November 2024</p> <p>End date: 22 December 2024</p> <p>Duration: 4 weeks and 3 calendar days.</p> <p>Rationale for length of time chosen for the first and second engagement periods has been provided:</p> <ul style="list-style-type: none"> • The TDA shape was well defined and low-level in terms of impacts, so the material was succinct allowing stakeholders to understand and respond promptly • No briefings were held which could have required more engagement time • The strategy and engagement period were aligned with the strategy used for a previous TDA ACP-2021-002. • No public holidays fell within the engagement period. • CAP 2989 proposes engagement for trial ACPs as a minimum of 4 weeks as likely impacts are low. <p>CAP2989, the CAA's additional guidance on Temporary or Trial ACP for BVLOS was published on 1 September 2024. Within their re-submission, the sponsor has stated that they are progressing in accordance with CAP 1616 version 4. However, their rationale for engagement period chosen partly relies on CAP 2989 which is linked to CAP 1616g which forms part of the suite of version 5 CAP 1616 documents. As CAP 2989 is linked to CAP 1616, version 5, the sponsor's reference to it has not been considered as part of their rationale.</p>
5	<p>Was the period of engagement (or consultation) appropriate?</p> <p>Yes</p>
	<p>First period of engagement February to March 2024</p> <p>At this stage the period of engagement is not considered to be appropriate. There is a lack of information available for stakeholders on which to provide fully informed responses. A further period of engagement should be undertaken. Further detail is provided within questions 7 and 8 below.</p> <p>Update February 2025 re-submission</p> <p>Overall stakeholders were given 8 weeks, and 6 calendar days to provide feedback on this ACP. Having been required by the CAA to re-engage on account of deficiencies in the engagement material circulated during the first engagement period, this period of time was split over two formal</p>

	engagement periods. During the second engagement period, no stakeholders requested further time to respond.									
	The total period of consultation conducted over two formal phases is considered to be sufficient, and proportionate.									
6	Has the change sponsor accurately summarised what stakeholders have said and identified all of the issues raised during the engagement in the stakeholder engagement summary document?	Yes								
<p>First submission 2024</p> <p>The sponsor has provided email evidence to support their engagement summary and Table 7 outlines ad hoc meetings conducted with stakeholders between 4 January 2024 and 12 March 2024. An accurate summary has been provided within Table 1 Summary of Feedback regarding what stakeholders said. The sponsor received 16 responses from 11 targeted stakeholders and 5 other stakeholders. The sponsor identified the following themes from the feedback provided: economic, engagement/consultation, environmental, legal; miscellaneous, operations, safety and no impact. The raw data has been reviewed and the sponsor has identified all issues raised.</p> <p>Update February 2025 re-submission</p> <p>The sponsor has provided both email and Microsoft Forms response data to support their engagement summary. During the second engagement round, the sponsor received 20 responses, 19 via Microsoft Forms and 1 via email.</p> <p>Responses were received from the following stakeholders:</p> <ul style="list-style-type: none">NATMAC members: ARPAS-UK, the British Gliding Association (BGA), the British Helicopter Association (BHA), MoD DAATM and NATS/NERL.Aviation stakeholders: Bembridge Airport, Bristow Helicopters Ltd., Butterfly Paragliding, Chichester and District Model Aero Club (CADMAC), Farnborough Airport, Babcock Onshore/Hampshire and IoW Air Ambulance, PDG Helicopters (Railtrack Survey) and NATS Southampton Airport.Environmental stakeholders: Chichester Harbour Conservancy and RSPB Langstone Harbour and Pagham HarbourLocal stakeholders: Estates Ltd., Ministry of Defence at Baker Barracks, Thorney Island and one response representing a private couple.Other stakeholders: National Grid Electricity Transmission (NGET) UK <p>Quantitative data was obtained demonstrating stakeholders’ level of support for the proposal from the 19 responses submitted via Microsoft Forms:</p> <table><tr><th>Level of support for ACP</th><th>Stakeholder responses</th></tr><tr><td>Strongly support</td><td>2 (10%)</td></tr><tr><td>Support</td><td>4 (21%)</td></tr><tr><td>Neither support nor object</td><td>5 (26%)</td></tr></table>			Level of support for ACP	Stakeholder responses	Strongly support	2 (10%)	Support	4 (21%)	Neither support nor object	5 (26%)
Level of support for ACP	Stakeholder responses									
Strongly support	2 (10%)									
Support	4 (21%)									
Neither support nor object	5 (26%)									

	Object	5 (26%)
	Strongly object	3 (16%)
	Total	19
	Level of support for ACP	Stakeholders
	Strongly support	NATS Southampton Airport, ARPAS UK.
	Support	CADMAC, Farnborough Airport Ltd., Babcock Onshore/Hampshire & IoW Air Ambulance, NGET UK.
	Neither support nor object	Thorney Island Barracks, UK Airprox Board, BGA, PDG Helicopters and NATS/NERL.
	Object	BHA, Chichester Harbour Conservancy, Private couple, Bristow Helicopters Ltd., Butterfly Paragliding,
	Strongly object	Pagham Harbour RSPB, Estates Ltd., Bembridge Airport,
	Comments were made by some of those stakeholders who expressed support for the proposal or raised no concerns:	
	<ul style="list-style-type: none"> • NGET UK stated that their helicopter surveys would not be affected. • Farnborough Airport Ltd. stated there would be no impact on their operation. • Southampton/Solent Radar responded that there would be no direct impact to their operation but sought contact details for tactical coordination purposes. • NATS stated there would be no impact on the NATS NERL plc operation. • The BGA stated that the proposed operating heights/altitudes do not impact on gliding operations. 	
	The sponsor identified the same themes as for the first engagement round. The raw data has been reviewed and the qualitative feedback received is discussed at question 7 below, together with the sponsor's responses.	
	7	Does the stakeholder engagement summary document detail the change sponsor's response to the identified issues?
		Yes
	First engagement period February to March 2024	
	The issues raised during the first formal engagement period are set out below, together with the sponsor's response.	
	<u>Flight safety risk for General Aviation (GA)</u>	

Bembridge Airport were of the view that the flight safety risk and risk assessment for GA traffic had not been correctly evaluated and lacked an understanding of the environment in which the sponsor would be operating. The Airport stated that Sandown and Bembridge are amongst the busiest airfields on the South coast with thousands of movements annually, the majority of which are between April and October. They considered that some GA pilots sometimes fail to correctly interpret routes/days/dates of Notice to Aviation (NOTAM) and many GA aircraft still have no means of interpreting Automatic Dependent Surveillance – Broadcast (ADS – B). They requested that the sponsor restrict themselves to remaining below 500 ft, as operating above that flight level (FL) would greatly increase risk of collision to GA and pose an unacceptable risk to flight safety that cannot easily be mitigated through technology or NOTAM.

Sponsor's response: The Operational Safety Case (OSC) will be submitted and reviewed by the CAA. It would not be possible to avoid any impact on all airfields/airstrips in the area. The TDA is designed to minimise impact: TDA section B is across the Solent and the TDA has been designed to avoid common operating procedures at airfields in the area, to reduce risk to aircraft whilst in climb/descent. Activating the TDA by NOTAM is the required means of communicating the activity. Unmanned Air Systems (UAS) will have FLARM and ADS-B, allowing the exact location of the UAS to be located. Disseminating of NOTAMs to all airfield users, by airfield operator, could help interpretation. The aircraft are very visible, bright white and orange and have navigation strobes fitted.

The 600ft TDA includes a buffer between the top of the TDA and UAS. The UAS will operate at between 400 and 500 ft above ground level (AGL). The UAS cannot operate too low due to moving ground risk of tall ships. However, operating below 600ft allows us to minimise impact on other airspace users (who have to be higher over the sea to allow a safe glide height back to land in emergencies).

Update February 2025 re-submission

The sponsor has stated that it is proving challenging for Skylift UAV Ltd. to source a FLARM device suitable for a UAS, but they are continuing to progress this issue. They have therefore changed their response to say that UAS *may* have FLARM and *will* have ADS-B.

Mass, payload and speed of UAV system would be a risk to GA aircraft.

Bembridge Airport stated that the mass, payload and speed of the UAV systems would cause potentially fatal consequences if a collision occurred with a light GA/LAA or light rotary type aircraft that are the mainstay of the islands' traffic.

Sponsor's response: The operating size and weight are not included in the engagement materials as specific aircraft to be used (and therefore weight) has not been confirmed at this point.

Minimum cloud base request to lessen reduced safety for GA aircraft.

The GAA asked whether there would be a minimum cloud base for the TDAs to be activated, suggesting 2,500 ft to lessen the reduced safety for GA aircraft forced lower by bad weather.

Sponsor's response: There will not be a minimum cloud base. However, for the purpose of this limited testing weather and the impact on GA users is of critical importance. Activation will be limited to suitable days for the purpose of the tests.

Impact on Barton Estate's airstrip

Bembridge Airport stated that the proposal made no reference to the active private airstrip at the Barton Estate which is often used for missed approaches/training and is a known diversion for Island based aircraft.

Sponsor's response: TDA section C has been made narrower to be 300 m further south from Barton Estate's airstrip.

Potential disturbance impacts to wildlife.

The Hampshire and IoW Wildlife Trust were not directly engaged but provided feedback regarding their concerns over potential disturbance impacts to wildlife, particularly birds including overwintering birds and nesting birds using the King's Quay area. They pointed out that the Solent Coast and North Coast of the IoW are designated as IoW National Landscape Area, Solent and Southampton Water Ramsar site, King's Quay Shore Site of Special Scientific Interest (SSSI) and the Solent and Southampton Water Special Protection Area (SPA). The Wildlife Trust requested that the sponsor consult with the relevant statutory bodies and that a full ecological assessment be conducted. They stated that Natural England would be able to offer further guidance.

The owners of the freehold and the leasehold for Kings Quay Nature Reserve registered their strong objection to the proposal and also pointed out the international recognitions attached to the Reserve. They sought reassurance from the sponsor that the Nature Reserve would not be overflowed. They informed the sponsor that they would take whatever action was necessary to protect the Reserve and listed a number of stakeholders that they believed should be consulted including environmental organisations, community representatives and local residents.

Sponsor's response: As per CAP 1616, Para B89, there is no requirement to assess this type of environmental consequence, because impacts are expected to be negligible for a short-term change.

We will make best endeavours to either route away from identified nature sites or avoid overflying sites at low tide (to minimise impact of feeding) and will fly at low speed (to allow birds to move away from the UAS. We will predominantly fly at 500 ft when near to this location.

Although the sponsor added the Kings Quay Nature Reserve and the Hampshire and IoW Wildlife Trust to their stakeholder list and the RSPB were already a targeted stakeholder, the sponsor does not appear to have added the other stakeholders suggested by the owners of Kings Quay Nature Reserve. The sponsor has not provided rationale for their approach. (To be addressed by CAA Clarification Question).

Impact on bird sites in the Chichester Harbour and overflight of Thorney Deep

Chichester Harbour Conservancy requested assurance that established, internationally recognised bird nesting and over-wintering birdlife sites in

the harbours are suitably considered/protected. They sought confirmation that a minimum height of 600 ft AGL and Above Mean Sea Level (AMSL) would apply across the entirety of the Chichester Harbour National Landscape (NL) and that operations are routed within the NL cognizant of bird hotspots. They went on to request assurance that Thorney Deep (Bird Sensitive Site) would be avoided.

Sponsor's response: We will be required to stay below 600 ft; however, we should be able to ensure 500 ft when near the nesting areas where possible. The aircraft are much smaller and lighter than in previous operations in the same area. They also tend to be very quiet as they will be flying on the wing, much like a conventional aircraft. We will make best endeavours to either route away from identified nature sites or avoid overflying sites at low tide (to minimise impact of feeding) and will fly at low speed (to allow birds to move away from the UAS). We will not be going anywhere near Thorney Deep.

Impact of section C on Barton Estate Association

Concerns were raised for freeholders of the Barton Estate regarding privacy, security and safety together with potential commercial loss and environmental issues for Estate farmers and landowners. A request was made for the coordinates of the TDA to be moved south for both safety reasons and as it would be less prone to misunderstanding and for the TDA to be narrowed over the IoW.

Sponsor's response: We currently operate over livestock with no impact on them. TDA section C has been narrowed to be 300m further south from Barton Estate's Airstrip.

Location of TDA segment A over Thorney Island

DAATM queried why segment A was still located over Thorney Island as the operating base was positioned in a location 3km to the North-East. They asked the sponsor to move the TDA to a more appropriate location away from Thorney Island to reduce the impact on military activity both in the air and on the ground.

Sponsor's response: The decision to route directly over Thorney Island was to reduce the impact on local wildlife nesting areas east of Thorney but we do not wish to hinder any ground or air operations at Thorney Island in any way. We would prefer to route overhead of the runway and stay clear of approach paths where possible. An alternative solution is to alter the TDA and move it east to attempt not to overfly Thorney Island at all. We would prefer to route over Thorney Island if possible but are happy to make this alteration if required.

Subsequent engagement shows that the sponsor changed the co-ordinates to route around Thorney Island.

Deconflicting airspace activity from military exercises

DAATM highlighted that there are certain periods where military exercises and aviation activity take place to and from Thorney Island and in the

airspace surrounding it. They requested pre-tactical deconfliction of airspace activity and requirements to ensure that all users agree on how best to deconflict activity or share the airspace safely. They referenced the deconfliction plan agreed for the previous ACP 2021 – 002 (BVLOS UAS Operations – Portsmouth to Isle of Wight).

Sponsor's response: Skylift will deconflict with all ground and airspace activity as required to affirm ongoing and uninterrupted operations at Thorney Island no matter the agreed TDA/flight routing outcome of engagement activities.

Positioning of sponsor's ground equipment on Chichester and District Model Aero Club (CADMAC's) flying site

CADMAC wished to have a say in the positioning of the sponsor's ground equipment on their flying site as during the previous Skylift Trial, the sponsor's operations containers were set up at the very end of the runway and CADMAC modified their flying procedures as a result. They expressed concern regarding potential risk of collision with model aircraft given the vertical extent of the containers and the aerals attached to them.

Sponsor's response: We will not be directly operating on Thorney Island during this Trial, so will have no ground infrastructure on site.

Impact on Search and Rescue (SAR) Helicopter operations

HM Coastguard asked what impact the proposed activity would have on the requirement for a 24-hour, short notice requirement for the SAR helicopter to get airborne. They sought a Letter of Agreement (LoA) and process for the Aeronautical Rescue team to utilise if the SAR Helicopter needed to get airborne during a period of activity.

Sponsor's response: The TDA is designed to avoid common operating procedures at Lee-on-Solent Airfield, to reduce risk to aircraft whilst at in climb/descent. We will always give priority to emergency aircraft movements.

A draft LoA has been submitted to the CAA between the sponsor and Babcock Onshore which operates the Hampshire Air Ambulance on behalf of the Hampshire and IoW Air Ambulance to enable access to the TDA and to deconflict with the sponsor's operations.

Danger Area Crossing Service (DACS)

The General Aviation Authority (GAA) asked if a DACS would be provided.

Sponsor's response: A DACS will not be provided. A Special Use Airspace Crossing Service (SUACS) will not be provided as the TDA is below the radar base. LoAs will be in place with emergency services to prioritise their transit.

Days/times of activation and arrangements for deactivation

The GAA provided feedback that details of dates/days/times of activation were far too vague. They also asked whether the UAV operator would promptly cancel the TDAs when activities had finished for the day.

Sponsor's response: Trials will run sequentially, but to allow for planned non-operational days, weather, other events etc. it is not the case that flying days will run continuously. The flying days will be spread across the 5-month trial period, from July to November 2024. During the trial, the expected operating hours will be Monday to Friday, predominantly in daylight hours. The airspace will be activated by NOTAM with at least 24 hours' notice.

Within the sponsor's "Appendix: Noise Assessments" they state that there will be a maximum of 7-weeks of flying, in daylight hours only and no weekend flying with on average 6 to 8 flights per operating day. The TDA will only be activated in accordance with the flying schedule.

Impact on local community/impact on privacy

Barton Estate Association explained that the Estate comprises a number of freeholders, most of whom were unaware of the proposal. They expressed uncertainty as to whether the impact on the local community through the Medina Valley had been fairly assessed. The potential for a long tradition of privacy, security and safety to be overturned without consultation was referred to. Estates Ltd. stated that they were prepared to contest the Trial and take legal action to protect their property and privacy, including actions regarding trespass, nuisance devaluation and damage to farming practices and their business operations.

Sponsor's response: Solent Transport are overseeing this trial with support from other agencies such as Skylift UAV Ltd. Solent Transport have overseen all activities and will continue to do so. UAS are legally allowed to operate, within CAA regulations. Aircraft will be at high altitude and will not be recording any footage, resulting in negligible infringement on landowners overflown. Paying costs is not a requirement of an airspace change and therefore will not be covered. There is no expected impact on property value.

The email correspondence shows that the sponsor asked Barton Estate Association for locations of property that they would prefer not to be overflown with a view to making an effort to accommodate requests within their flight plans where possible.

Noise impact

Estates Ltd. provided feedback regarding noise nuisance stating that they were positioned in a valley 140 ft to 160 ft above sea level and the estuary, as such the UAS height would be lower for them.

Sponsor's response: UAS are legally allowed to operate, within CAA regulations. Aircraft will be at high altitude - the TDA ceiling is 600 ft AGL. The UAS are expected to be significantly quieter than other light aircraft who may operate at that height when the TDA is not in place.

Access to private land for UAS recovery and concern regarding nature of cargo

Estates Ltd. stated that their estate was a private one with no public access or right to recover any items and that they owned the airspace from the ground to 1,000 ft. They stated that trespass had already occurred, and legal action commenced. Estates Ltd. stated that data shows drone accidents are increasing and that a drone can glide or crash up to a mile from its flight path. The view was expressed that chemotherapy drugs are radioactive and poisonous with regulations in place that they should not be carried.

Sponsor's response: UAS are legally allowed to operate, within CAA regulations. Skylift UAV Ltd. believe that no trespass has already occurred. TDA Section C has been redesigned to avoid flying over this land as a good will gesture. The Operational Safety Case (OSC) will be submitted for CAA review. All possible mitigations to avoid crashing have been implemented. There are no plans to carry dangerous goods during the Trial All cargo will be securely packaged and attached to the UAS, resulting in almost no risk to cargo being dropped. The packaging has been subject to drop tests and proven as leak proof.

In further correspondence, Estates Ltd. made clear that the redesigning of TDA Section C did not resolve the issues, nor did reducing the buffer zone on one side of the TDA.

Sponsor's response: The TDA has been redesigned to avoid overflying their property. There will be no change to the buffer zone within the TDA. The TDA reduction reduces the area for flight operations, but still includes the required buffer zones between the operating area and the TDA edge.

Alternative solutions proposed.

Estates Ltd. suggested that the route be moved to the south of Wootton Creek or that the sponsor use the Medina River in a narrow vertical corridor. If progressed, the medical contents being transported could be recovered quickly. Otherwise, they suggested use of a UAV boat or a hydrofoil boat.

Sponsor's response: Moving the TDA south of Wootton Creek would position it between the populations of Fishbourne and Ryde. Moving TDA Section C further west over the Medina River would disproportionately increase the length of crossings and therefore result in larger environmental impact of the UAS and impact on other airspace users. It would also overfly or fly very close to Cowes which is currently not impacted. Overflying or flying near to Cowes, Fishbourne or Ryde is considered a disproportionate safety risk. Alternative modes of transport are out of scope of this airspace trial.

Engagement and consultation

Barton Estate Association stated that they were not aware of communications with Solent Transport on the issue nor of discussions within the Parish

Council and asked that the local community be asked for their feedback. Estates Ltd. also referred to a failure to consult with local parish councils and affected residents.

Sponsor's response: The CAP 1616 process requires targeted engagement with aviation stakeholders. There is no requirement for full consultation. Having said that, all responses, from any stakeholder will be reviewed and analysed.

Stakeholders responding regarding no impact on their operations.

Southampton Air Traffic Control (ATC) provided feedback that the proposal would have minimal effect on the Southampton airport operation due to it being outside the Solent Control Area (CTA) and due to the levels involved. They considered there would be no adverse effect on air traffic at Solent as the TDA would help to segregate the traffic. NATS/NERL, Lee-on-Solent Airport, the RSPB and Fleetlands Heliport all stated there would be no impact on their operations or said they had no comments to make.

CADMAC stated that there would be no conflict of interest with the majority of their flying activities being conducted at the weekends/Bank Holidays in accordance with an agreement with Baker Barracks (Thorney Island) but asked for forewarning of TDA activity.

Permissions from landowners of landing sites.

The sponsor has stated that the landowners of the landing sites have been engaged throughout the process to make sure they understand the trials request on them and that the correct permissions/agreements are in place. These are available to be reviewed on request by the CAA.

CAA request to be made for the sponsor to provide the permissions/agreements from landowners of the landing sites.

Letters of Agreement

Draft LoA submitted between the sponsor and Babcock MCS Onshore, dated 11 April 2024 and signed by the latter, but not yet signed by the sponsor.

Update February 2025 re-submission

The sponsor has stated that as the project has progressed, it has been identified that a Record of Agreement (RoA) rather than a LoA would be sufficient.

Revisions made to the airspace design on account of stakeholder feedback.

The sponsor made revisions to the airspace design on account of feedback:

- TDA section A was moved east of Thorney Island, following the river, in response to feedback from DAATM.
- TDA section C was made narrower to be 300 m further south from Barton Estate's airstrip, in response to feedback from Barton Estate and Bembridge Airport.
- TDA section C was re-designed away from property. This is referred to by the sponsor as a good-will gesture in response to feedback from Estates Ltd.

For operational reasons, the sponsor removed one stub from the design as the landing site it referred to was considered no longer suitable. However, 4 stubs were presented to stakeholders in the material circulated on 20 February 2024. No explanation has been provided within the submission as to why an additional stub has been removed. It appears to have occurred due to the moving of TDA section A east of Thorney Island taking the place of where the stub was originally placed.

Revisions made to the airspace design on account of CAA operational feedback.

The sponsor further revised the airspace design on account of feedback from the CAA:

- The TDA was widened, based on CAA safety/operational advice. The sponsor stated that the re-design still avoids overflying Estates Ltd.'s property and Barton Estate's airstrip.

From the co-ordinates provided, it appears that the dimensions of Sections B and Section C plus the Hospital stub have been revised. The detail of the widening of the TDA has not otherwise been explained. Further explanation is required from the sponsor on this point (addressed at question 8 below).

The sponsor has assessed that that there will be no significant change to new stakeholders overflown, or impacts, compared to the engagement, and have therefore decided that no further engagement is required. They have not stated the reasons for this conclusion. The sponsor should provide an explanation for concluding that there will be no significant change.

Update February 2025 re-submission

Further to CAA request, the sponsor has explained why revisions were made after the first engagement round. They say that the CAA's UAS sector had previously recommended avoiding overflying populations and the safety concern raised was regarding TDA breadth around C1/C6. This had been narrowed to avoid overflight of Barton Estate's airstrip and Estate Ltd.'s property and the design was said to be too narrow when considering the need for a safety buffer, contingency area, and an operating area within the TDA and the need to avoid populations. The sponsor has stated that the resulting design (on their first submission to the CAA) remained narrower than originally engaged on and that the difference is negligible but still mitigates against the safety concern of it being too narrow. They have concluded no significant change as the TDA is smaller, so reducing impact on other airspace users and overflies the land less (due to the narrowing over the IoW and avoiding Thorney Island) so impact on stakeholders on the ground is reduced.

Feedback from second engagement period

Many stakeholders re-iterated objections and concerns raised during the first round of engagement. All issues raised during the second engagement round are set out below, together with the sponsor's response.

Military exercises

The MoD via DAATM reiterated their previous feedback, that there may be periods when military exercises and aviation activity takes place to and from Thorney Island and in the airspace surrounding it and that the sponsor and relevant MoD users should be able to pre-tactically deconflict airspace activity and requirements so that all can agree on how best to share the airspace safely. Although no exercises are planned for the new TDA period, the sponsor was asked to make contact as required.

Sponsor's response: All previously received feedback, from all stakeholders, was taken onboard prior to the second engagement round.

The sponsor has not provided a commitment to making contact with the MoD as required. Condition number 2 is recommended at question 12 below to address this point.

Safe separation from surface vessels

DAATM passed on feedback from HMS Queen Elizabeth representatives that the sponsor should consider how to maintain a minimum safe separation from any surface vessels especially large vessels both vertically and horizontally in both the physical sense and from a SHIPHAZ perspective. The MoD sought information on how a UAS would react if it encountered military and civilian shipborne transmitters.

Sponsor's response: Aircraft will be at high altitude (TDA ceiling is 600 ft AGL) so operating at between 400 and 500 ft AGL, thus avoiding the moving ground risk of tall ships. There will be no change to the TDA design. Regarding shipborne transmitters, the UAS will alert the pilot if a shipborne automatic identification system (AIS) is on the map. Therefore, the pilot is aware of vessel location and will avoid ground-based hazards (for e.g., ships). The UAS cannot directly detect transponders but can pick up radar rebroadcast repeats and ADS-B.

Impact on SAR Operations

Concern was raised by Bristow Helicopters regarding potential impact on safe and efficient completion of a SAR task and that the presence of the TDA may prevent successful completion of a training evolution. Although the SAR helicopter operator commented that it may be that sufficient operational procedures could be put in place to ensure no adverse impact resulted but recognition of the significant potential impact on SAR operations and training must be taken into account and a statement of potential impact recorded. Bristow Helicopters provided detail that the SAR aircraft operates daily for training or SAR tasking, completing approximately 900 flying hours per year, launching from and returning to Solent Airport and frequently operating at low level within the Eastern Solent. The British Helicopter Association (BHA) stated that access for emergency

service helicopters should be more than an offer only, via the critical care desk but should be a published procedure as they are carrying out critical missions which trial operations should not get in the way of.

Sponsor's response: There will be dedicated communication channels and access to the TDA for high priority traffic, if requested. Best endeavours will be made to accommodate such requests, but safety of users within the TDA must not be compromised. The TDA is designed to avoid common operating procedures at Lee-on-Solent airfield, to reduce risk to aircraft whilst in climb/descent. Whenever safe to do so, priority will be given to high priority traffic movements, such as SAR missions. Training flights will not be granted access to the TDA and should be planned to avoid the area. There will be no change to the TDA design.

Activation

There was a request for the TDA to be limited to fewer hours in the middle of the day, during the working week only. UK Airprox Board sought promulgation of activation with plenty of notice and for promulgation of deactivation to occur as soon as possible with adjacent airfields notified and Farnborough Airport kept informed due to the proximity of their LARS area to the northern elements of the TDA.

Sponsor's response: TDAs will only be activated as per the flying schedule. Activation will be by NOTAM with a minimum of 24-hours' notice. The trial will operate 0900 – 1700, Monday to Friday. This aims to mitigate impacts compared to operating in the evenings/at weekends.

Minimum cloud base

PDG Helicopters asked for a minimum cloud base to be published which would guarantee overflight of the TDA and suggested TDA ceiling plus 500'.

Sponsor's response: There is no proposed minimum cloud base. However, activation will be limited to suitable days for the purpose of that day's trial/activities.

Impact on other airspace users

ARPAS UK raised concerns that some pilots used to flying around the IoW in particular may not be aware of the TDA activity. Bembridge Airport registered their strong objection to the proposal highlighting that the area is one of intense GA traffic operating from 500 ft. with every type of light sport aviation utilising the area from paragliders/gliders to helicopters and light jets operating from low-level to the base of the Solent zone. Their view was that there was insufficient risk mitigation, planning or engagement with no Standard Operating Procedure (SOP) or agreement. They pointed out that the Barton estate has its own airstrip which is often used as a diversion or training field and that there is a direct track from Bembridge to Goodwood Airport as well as military flight operations into Thorney Island.

Sponsor's response: The TDA will be activated via NOTAM as per the flying schedule with a minimum of 24-hours' notice. The TDA is designed to

minimise impact on other airspace users: the main TDA B is across the Solent, the TDA is designed to avoid common operating procedures at Bembridge and Goodwood Airfields to reduce risk to aircraft in climb/descent, an impact assessment with Southampton Air Traffic Control (ATC) has been completed, TDA C was previously narrowed to be 300 m further south from Barton Estate's airstrip and operating below 600 ft minimises impact on other airspace users (especially for users in proximity to TDA B) who have to be higher over the sea to allow a safe glide height back to land in emergencies. Some traffic will have to operate higher to go above or travel further to go around the TDA. There is a flow of traffic to and from Bembridge to the East Wittering/Selsey area which could continue to be used for access to and from Goodwood airport. The Operational Safety Case will be submitted and reviewed by the CAA. There will be no change to the design.

Safety risk for GA users

Butterfly Paragliding stated that paragliding and hang-gliding activities are difficult enough and that avoiding UAS increases complexity and safety risk for paragliders and hang gliders.

Sponsor's response: The TDA is being implemented as per the requirement for BVLOS operations. The TDA should increase safety for other airspace users by segregating trial traffic.

Insufficient information on the drones to be used

Bembridge Airport stated that there is an amount of GA traffic that is either non-radio or not conspicuous, and due to the amount of traffic crossing the Solent to visit both Bembridge and Sandown, insufficient engagement on the size, weight and payloads of the drone had been discussed with the Airport.

Sponsor's response: Size, weight and payload information was not included in the engagement materials, as it was not considered necessary information for stakeholders to be able to confirm the safety, operability, or noise impacts of the trial.

Position of equipment on Runway at Thorney Island

Although Chichester and District Model Aero Club (CADMAC) did not see a conflict with the proposed timetable of operations, but remained concerned about potential positioning of Skylift's equipment at the southern end of the runway at Thorney Island.

Sponsor's response: The TDA was moved away from Thorney Island and the use of private land previously. Take-off and landings will be supported with mobile vehicles. There will be no requirement for buildings.

Impact on protected nesting birds and local nature reserves

The Chichester Harbour Conservancy and the RSPB expressed concerns regarding the impact of the TDA on protected breeding and nesting birds due to the routeing of the TDA over internationally important nesting sites within the NL and SSSI. The Chichester Harbour Conservancy referenced East Head and both stakeholders were concerned about Pilsey Island. The RSPB stated that the TDA goes directly over highly wildlife sensitive areas of Chichester Harbour, including Pilsey Island Nature Reserve at the southern tip of Thorney Island and Stakes Island, home to Schedule 1 protected breeding birds such as Little Tern which are highly sensitive to drone activity and prone to disturbance. They pointed out the Schedule 1 legal protections and the Chichester Harbour designations as a SSSI, SPA, Special Area of Conservation (SAC), AONB and Ramsar site. The RSPB stated that the timings, route and proposed altitudes are all problematic and inappropriate with the first week of the trial (12 May 2025) being when the birds will nest build, with any regular disturbance carrying a high chance of them abandoning the nest. Even if the drone immediately climbed to the highest altitude proposed, little Tern are easily flushed from their nests when approaching from a distance and at altitudes exceeding 300ft. The stub covering the Langstone Harbour entrance was referred to as an important route for Schedule 1 protected nesting birds as they travel between their island colonies and their feeding grounds in the Solent. The disturbance risk to protected birds due to the stub positioned over the Medina Estuary SSSI was referred to as very high. The RSPB concluded that the environmental impacts had been largely overlooked. Concern was expressed by a private individual regarding likely negative impact on Kings Quay nature reserve/SSSI and its wildlife.

Sponsor's response: There is no CAP 1616 requirement to assess other types of environmental consequence because impacts are expected to be negligible for a short-term change. The UAS need to operate in fair weather, hence May to November has been chosen. Research has shown that operating 330 ft from birds should avoid flushing, in some cases the distance can be as little as 98 ft without causing flushing. Aircraft will operate between 400 and 500 ft AGL. Skylift UAV Ltd. currently operate over livestock with no known impact to them. We will make best endeavours to route away from identified nature sites or avoid overlying sites at low tide (to minimise impact of feeding) and will fly at low speed (to allow birds to move away from the UAS). There will be no change to the design.

Subsequently the sponsor has explained that following the second engagement period, the CAA's UAS team advised a further reduction in the ground risk or increased mitigations which has resulted in changes being made to the design. The SPA and Ramsar sites within Chichester Harbour and on the IoW will no longer be overflown. Mitigations will remain in place for the Solent Maritime SAC which remains within the TDA.

Nuisance/Noise nuisance

Estates Ltd. stated that the trial would cause noise nuisance and that the proposed operational hours were unreasonable. Two individuals asked that hours be limited to a few hours mid-day on weekdays.

Sponsor's response: Aircraft will be at high altitude. The TDA ceiling is 600 ft AGL. The UAS are expected to be significantly quieter than other light aircraft who may operate at that height when the TDA is not in place. The trial will operate between 0900 and 1700 Monday to Friday which aims to mitigate impacts on noise and airspace access compared with operating in the evenings and/or at weekends.

Noise analysis/noise metrics

Farnborough Airport had assessed no impact on their operation. They stated that gathering relevant noise metrics during the trial would be far more helpful than any modelled data and would increase understanding for future operations over more populated areas. Estates Ltd. stated that the Valley reverberates noise which has not been assessed.

Sponsor's response: Noise data could be collected during operations, but it is not part of the current trial plan success criteria. Noise metrics may be collected ad hoc if deemed useful. Noise analysis has been carried out in line with CAP1616i.

Recovery of crashed UAS

Estates Ltd. stated that access to private land to recover a crashed UAS would not be given.

Sponsor's response: An Operational Safety Case (OSC) will be submitted to the CAA and reviewed by them. All possible mitigations to avoid crashing will be implemented.

Violation of freehold interests

Estates Ltd. considered the TDA would violate their freehold interests.

Sponsor's response: TDA Section C was redesigned away from property belonging to Estates Ltd. UAS are legally allowed to operate, within CAA regulations. Aircraft will be at high altitude and will not be recording any footage. There will be negligible infringement on landowners overflown.

Overriding commercial interests

Butterfly Paragliding were of the view that commercial interests were encroaching on their opportunity to enjoy free flight.

Sponsor's response: This trial is being led by Solent Transport who are funded by the Department for Transport. Skylift UAV Ltd. are the UAS operator. This TDA is not about profiteering.

Engagement issues

The BGA stated that the questions in the survey form did not allow for accurate responses, for e.g., if a respondent was content with the height of the TDA shape, rather than with the shape. Data is likely to be skewed towards positive responses.

Sponsor's response: Microsoft Forms offered a yes/no choice, and if the respondent selected "no" then they could provide rationale. There was also

a free-text box at the end of the survey for any comments.

Mission creep

Concern was expressed that the proposal would be varied over time creating greater negative impacts.

Sponsor's response: Initially trial activities will be completed over a shorter distance, while testing the UAS' operability. As the trial progresses, so will the flight distances. Other than within the landing/take-off sites, noise impacts of overflights will be below the noise threshold. The trial will be approved for a specific operating area and there will be no scope creep. We do not intend to make the trial airspace a permanent design.

Suggestions for other outcomes

Estates Ltd. reiterated previous comments that boats and land services would be a cheaper and safer solution and stated that the trial should be scrapped.

Sponsor's response: Alternative transport is out of scope. The trial will go ahead, if approved.

Raising objections while TDA is operational

Two stakeholders wished to reserve the right to object to the negative impacts of the ACP while it was operational.

Sponsor's response: Feedback will be gathered throughout the trial, in accordance with CAP 1616 requirements.

LoA/RoA

Babcock requested direct contact to conduct an update of the LoA to ensure safe Helicopter Emergency Medical Services (HEMS) operations that Babcock, on behalf of Hampshire and IoW Air Ambulance has with Skylift. The previous LoA was valid for the previously completed trial.

Sponsor's response: LoAs will be reviewed and updated if necessary.

The sponsor has provided RoA with Babcock Mission Critical Services Onshore Ltd. effective 1 July 2025 to 30 November 2025 addressing Air Ambulance access to the TDA area and deconfliction with UAS operations in it. The RoA is dated 21 January 2025 and signed by both parties. The commencement date does not align with the sponsor's proposed operational dates for this trial (12 May to November 2025). In addition the RoA states that the sponsor will be flying at Dodnar Farm (near Newport on the IoW) and in the event of a call from HEMS will land immediately at Dodnar Farm, however the TDA doesn't extend that far. This section needs to be removed from the RoA.

	<p>The sponsor has also submitted a RoA with Bristow Group who operate the Coastguard service on behalf of HM Coastguard in co-ordination with Aeronautical Rescue Coordination Centre (ARCC) based in the Joint Rescue Coordination Centre (JRCC). The aim of the RoA is to enable HM Coastguard access to the TDA and deconfliction with UAS operations in it. This RoA is not fully complete or signed.</p> <p>The outstanding issues regarding the above RoAs are dealt with via recommended condition 1 at question 12 below.</p> <p>Revisions made to the airspace design on account of CAA feedback.</p> <p>No changes were made to the design on account of stakeholder feedback during the second engagement round. The following changes were made to the design, on account of feedback from the CAA's UAS team, after the second engagement period had concluded:</p> <ul style="list-style-type: none"> • TDA A (Chichester Harbour area), TDA C (over the IoW) and Stub H (on the IoW) have been removed • Stub F (near Southsea) has been absorbed into TDA B over the Solent (to allow access to the TDA over the water). <p>The sponsor has explained that these changes, on account of CAA feedback, directly relate to several feedback points and address the main reasons for stakeholders objecting or strongly objecting the proposal:</p> <ul style="list-style-type: none"> • The removal of TDAs A and C and Stub H has significantly reduced the amount of land overflown, and therefore, the impact on populations overflown. Their removal has also removed the potential legal implications of overflight of properties and/or access to landowners' airspace. • The SPA and Ramsar sites on the IoW and within Chichester Harbour will no longer be overflown. Mitigations will remain in place for Solent Maritime SAC which remains within the TDA. • Removing TDA A provides easier routings between Bembridge Airport and Goodwood Airport. No impact was expected for operations into/out of Lee-on-Solent, Barton Estate, Bembridge or Sandown, as the design intentionally avoided their standard routings, and this has not changed. The TDA is considerably smaller and away from a major GA flow around the IoW, therefore reducing the impact on their operating activities. The removal of Stub H moves the TDA further from Solent Control Area (CTA).
8	<p>Is the change sponsor's response to the issues raised appropriate/adequate?</p> <p>Yes</p>
	<p>Update February 2025 re-submission</p> <p>In the first submission there were instances where the sponsor's response was not appropriate/adequate at that point and areas where there was a lack of clarity, consistency and detail across the document set (as listed in black text below). The sponsor's response to each item within their second submission has been re-assessed and updated (blue text below):</p>

1. Operational period of Trial. There is an inconsistency in the stated proposed operational period for the trial. At Section 7 Next Steps the sponsor states that they aim for the trial to be operational from June 2024. The engagement material referred to June to November 2024. At Section 7 Summary and within the Trial Plan they state that it will operate from July to November 2024.
The proposed operational period of the trial has moved to May to October 2025. No inconsistencies have been found across the document set.
2. Number of stubs. The engagement material (circulated 20 February 2024) shows the proposed TDA split into 3 segments with 4 stubs. The final design shows 2 stubs. The sponsor has explained that one stub was removed for operational reasons (there is no statement regarding which stub this refers to). There is a lack of explanation regarding the 4th stub which appears to have been subsumed within the moved TDA section A. Details were provided in the engagement material for the second engagement round on each of the stubs and how and why they have changed/been removed, as applicable. The purpose of the stubs has been explained and 2 charts provided to show how the design and position of the stubs has evolved.
3. Widening of TDA. The sponsor refers to the widening of the TDA on CAA advice on safety/operational grounds. The sponsor is required to provide explanation regarding this reference.
The sponsor has explained that the CAA's UAS sector had previously recommended avoiding overflying populations and the safety concern raised was regarding TDA breadth around C1/C6.
4. Way in which TDA has been widened, on CAA advice. There is no explanation as to the way in which the TDA has been widened, or which sections this applies to. Stakeholders would have to compare the set of co-ordinates provided on 20 February 2024 with the co-ordinates provided in the Trial Plan to establish which sections this applies to and to what extent the revisions have been made.
TDA breadth around C1/C6 was widened. This had been narrowed by the sponsor to avoid overflight of Barton Estate's airstrip and Estate Ltd.'s property but the design was said by the CAA to be too narrow when considering the need for a safety buffer, contingency area, and an operating area within the TDA and the need to avoid populations.
TDA C has now been removed further to CAA UAS guidance.
5. Daylight hours. Within the Trial Plan the sponsor states the TDA will be activated *predominantly* in daylight hours. Within Appendix: Noise Assessments they state activation will be *within daylight hours only*.
The sponsor has removed references to daylight. Activation is planned to be between 0900 and 1700 from May to October 2025 with the last week of flying scheduled for week commencing 22 September 2025.
6. Dates/Days/Times of activation: the GAA stated that information on this was too vague. The sponsor has not provided dates but says there will be 7 weeks of flying over the Trial period. They have stated weekdays will be used but have not been more specific than this. The Trial Plan provides duration of flying time VLOS for the first 4 flights in week 1 but for weeks 2 and 3 have provided no duration of flying time. The sponsor has instead provided flight distance, but stakeholders would not know what the distance would equate to in flying time. For weeks 4 to 7 there are references to full days of flying without defining what this means.
More information has been provided. Activation is planned to be between 0900 and 1700 Monday to Friday with the trial plan showing plans for flights to be spread from May to October 2025 with the first week of operations commencing 12 May 2025 and the last week commencing 22

September 2025. There will be a maximum of 7-weeks of flying. The sponsor has revised their plans so that all trials will operate BVLOS. They have also revised the number of flights per operating day with an increase from 4 return flights per day in the first submission to 6 to 8 flights per operating day in the second submission. The caveat has been included that flexibility will be required for flying days/periods taking account of weather, failed sorties or other unplanned factors. The sponsor has removed flight distance from the Trial Plan and instead included the purpose of each trial to be conducted, the minimum number of return flights expected to be conducted within each trial activation and whether multiple aircraft are expected to participate.

7. Specific aircraft to be used: In response to Bembridge Airport, the sponsor stated that the specific aircraft to be used (and therefore weight) has not been confirmed at this point. Also, the sponsor stated in response to Estates Ltd. that the UAS are expected to be significantly quieter than other light aircraft who may operate at that height when the TDA is not in place. This statement is not supported by reference to the type and characteristics of the UAV that they plan to operate. These responses do not appear to be adequate considering the sponsor proposes commencing this Trial in June or July 2024 and the lack of information makes it difficult for stakeholders to provide a fully informed response on potential impact.

Appendix 8 Trial Plan provides information on the types of UAS to be deployed, i.e., all trials will operate one or more of the Skylift V23, Flying Basket FB3 and/or HD-606 aircraft. No other information on the characteristics, weight etc. of each of these UAVs has been provided. However, spot noise metrics for two UAS have been assessed using CAP 1616i guidance: the V23 UAS which the sponsor expects to be the most frequently used UAS within the trial, and the FB3 UAS which is expected to be the loudest. The sponsor presented their findings within their engagement material and their stage 4 submission. The additional information and assessment findings are considered adequate to address this point.

8. Impact of widening the TDA: The sponsor assesses that there will be no significant impact on new stakeholders overflowed, or impacts, compared to the engagement, and have therefore decided that no further engagement is required. They have not stated the reasons why they have reached this conclusion. The sponsor should explain why they have concluded that there will be no significant change.

The sponsor states that TDA C (on their first submission to the CAA) remained narrower than originally engaged on and that the difference is negligible but still mitigates against the safety concern of it being too narrow. They concluded no significant change as the TDA is smaller, thus reducing impact on other airspace users and overflies the land less (due to the narrowing over the IoW and avoiding Thorney Island) so impact on stakeholders on the ground is reduced. TDA C has now been removed further to CAA UAS guidance.





9. The sponsor should re-engage with their full stakeholder audience so that stakeholders have sight of the additional detail, explanations and areas of clarification required by the CAA. Stakeholders should be given reasonable and adequate time to provide their feedback. A second formal engagement round was conducted during which stakeholders were given 4 weeks and 3 calendar days to submit feedback. The engagement materials were improved upon to address items raised by the CAA.

10. Suggestions were made by respondents to the engagement activity that the sponsor add new stakeholders to their stakeholder list. These included Natural England. The sponsor added the Kings Quay Nature Reserve and the Hampshire and IoW Wildlife Trust. Another suggested stakeholder, the RSPB, were already on the targeted stakeholder list. The sponsor should add Natural England and any other suggested stakeholders (not already added) to their stakeholder list and include them in the new engagement activity mentioned above.

Some stakeholders including Natural England and Farnborough Airport were added as stakeholders at the start of the second engagement

	<p>period. The sponsor did not add all non-aviation stakeholders suggested, as CAP 1616 requires engagement with aviation stakeholders. This approach was discussed and agreed with the CAA before the second engagement round was conducted.</p> <p>In addition, within any future Stage 4 re-submission to the CAA the sponsor is required to:</p> <p>11. Provide to the CAA the permissions/agreements from landowners of the landing sites. The final design now incorporates one landing/take-off site, this is Stub F which has been incorporated into the main TDA shape. The sponsor has submitted email evidence from Historic England which confirms that discussions have been ongoing with Skylift UAV Ltd. since early 2024 to agree the use of the Fort Cumberland site in Portsmouth for take-off/landing and that the sponsor is completing a RAMS that the Historic England Health and Safety team must sign off prior to a lease agreement being completed. Subject to the necessary approvals/agreements being in place Historic England are minded to grant the sponsor permission to use the site as a take-off/landing location.</p> <p>12. Provide more robust rationale to support the 4-week period of engagement period initially allowed for stakeholder responses. A more in-depth rationale has been provided (as outlined in question 4 above).</p> <p>13. Provide rationale for the length chosen of a 3-day extension to the engagement period and the factors that were considered in making the decision to extend for that duration. An explanation has been provided that the 3-day extension was not intentional (as outlined in question 4 above).</p>	
9	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>The sponsor has stated that they will undertake regular engagement with stakeholders during the 5-month trial and report any complaints to the CAA. This CAP 1616 requirement is confirmed via recommended condition number 3 captured in question 12 below.</p> <p>Update February 2025 re-submission The sponsor has re-iterated their commitment to engaging regularly and reporting any complaints to the CAA during the trial. The recommended condition remains.</p>	
10	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>First submission 2024 The sponsor states that the number of impacted flights is expected to be minimal. They expect the impacted aircraft would opt to go above the TDA rather than around it, as this would involve additional low level flight overland. CAA Regulator (Technical) and CAA Regulator (Environmental) are likely to require further detail from the sponsor in terms of the traffic</p>	

	<p>environment/a traffic sample/traffic data analysis to be able to assess the sponsor's statement. As such it is not possible to reach a conclusion for Question 10 at this stage.</p> <p>Update February 2025 re-submission</p> <p>The sponsor has stated that overflight noise nuisance for residents will not be created as the majority of the TDA is over water and that 100% of trial associated traffic will operate within the bounds of the trial airspace. They have concluded that it is disproportionate to produce noise footprints based on the duration and impact of the proposed trial. Spot noise metrics for two UAS have been assessed using CAP 1616i guidance. The sponsor has stated that the V23 UAS is expected to be the most frequently used UAS within the trial, whilst the FB3 UAS is expected to be the loudest. They do expect to use other UAS during the trial but have considered that assessing the most frequent and loudest UAS offers a representative assessment of noise impacts. Their findings of this assessment have been presented within their submission.</p> <p>The Environmental Regulator has concluded that over the eastern stub F, residents may theoretically be overflown but that whilst the aircraft are at cruising altitude the noise assessment is below the daytime 65dB threshold (please see Environmental Assessment).</p>	
11	<p>Taking the above considerations into account, does the SME recommend that this proposal has met the engagement (or consultation) requirements of the Temporary Airspace Change process?</p>	Yes
	<p>First submission 2024</p> <p>There are areas identified above which the sponsor needs to clarify for the CAA to enable progression with stage 5 assessments. There are also items referred to above that have not been clearly or adequately described for stakeholders. A further period of engagement with stakeholders will be required to fill missing gaps of information that CAA SMEs have identified from an engagement, technical and environmental perspective, and to provide clarification where applicable.</p> <p>There is significant "storytelling" missing from the sponsor's engagement activity. When engaging again, they should provide charts and explanatory text to show how the airspace design has evolved up to this point, provide the detail and clarifications required including detail on potential impacts so that stakeholders can provide fully informed responses. Stakeholders should be given a further opportunity to comment over an adequate period of time.</p> <p>Update February 2025 re-submission</p> <p>As required by the CAA, the sponsor conducted a second round of engagement and provided the requisite additional detail, explanation and clarification to better inform and aide stakeholders' understanding of their proposed trial. The sponsor has also improved the quality of their CAP 1616 stage 4 submission filling in missing gaps of information and providing more clarity on engagement items raised previously by the CAA.</p> <p>The sponsor engaged for a total period of 8 weeks and 6 days which is considered sufficient and proportionate. They predominantly engaged with aviation stakeholders as required by CAP 1616 but added some non-aviation stakeholders as the trial progressed. They achieved a good level of response across the different types of stakeholder groups and have provided their own response to the issues raised.</p>	

	<p>The sponsor revised their design on account of feedback received from stakeholders during the first engagement period and revised the design further on receipt of CAA guidance. The sponsor revised the design of the TDA again on account of CAA guidance provided after the second engagement period had concluded. These revisions have helped to address concerns raised by stakeholders by reducing the amount of land overflowed, removing potential legal implications of overflight of properties and/or access to landowners' airspace, avoiding overflight of the SPA and Ramsar sites on the IoW and within Chichester Harbour and reducing impact on some GA activities. RoAs/LoAs require finalising, and the sponsor must set up channels of communication with the MoD. These points are addressed by way of recommended conditions.</p>		
12	Are there any Condition(s) which the change sponsor must fulfil before activation (if approved)? If yes, please list them.	Yes	
	<p><u>Prior to implementation:</u></p> <p>Recommended condition no.1: The sponsor is required to submit complete, corrected, finalised and signed RoAs/LoAs.</p> <p>Recommended condition no.2: 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> <p><u>After implementation:</u></p> <p>Recommended condition no.3: 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>		
Targeted Engagement (or Consultation) Assessment sign-off			
	Name	Signature	Date
Assessment completed by Airspace Regulator (Engagement and Consultation)			2 May 2024 Updated 4 March 2025
Consultation assessment conclusions approved by Principal Airspace Regulator			10 Mar 25