

CAA Targeted Engagement Assessment – Temporary Airspace Changes

Title of airspace change proposal	Establishment of a Temporary Danger Area (TDA) for a 90-day period to the Northwest of Bristol, to enable BLVOS flight operations (previously a Temporary Reserved Area-TRA)
Change sponsor	National Police Air Service (NPAS)
Project reference	ACP-2024-035
Case study commencement date	
Case study report as at	23 rd April 2025 (updated: 29 th May 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 Assessment		
1	Has the change sponsor identified the right audience(s) and provided a rationale for selecting them?	YES
	<p>Please note: This assessment refers to the proposal being both a TRA and a TDA. Following feedback received from stakeholders and the CAA, the proposal was changed from a TRA with a six-month trial to a TDA with a 90-day trial in May 2025. A revised TRA with a 90-day trial is now subject to a separate airspace change proposal (ACP-2025-022).</p> <p>23rd April 2025: The Submission Document for the TRA trial includes a section detailing the summary of engagement that has been undertaken, along with outlining how stakeholders were identified by the change sponsor. It explains that the NATMAC list was reviewed and used as a starting point for identifying stakeholders and additional organisations were added based on their proximity to the proposed TRA. The change sponsor only included national bodies if a site, or activity they manage would be directly impacted by the proposal. A list of stakeholders was not included within this section but was included as a table within Appendix A of the Submission Document and in the Engagement Strategy.</p>	

The stakeholder list within Appendix A also contained a further rationale for their identification and engagement by the change sponsor, along with columns stating whether a response was received and if it resulted in an amendment to the proposal. The table also stated whether the stakeholder had been identified at the start of the engagement process, or whether it had been added during the engagement period, by either being made known to the change sponsor, or by another stakeholder.

Early engagement with some stakeholders, prior to the period of engagement commencing in November, along with the assessment meeting with the CAA, helped the change sponsor to finalise the stakeholder engagement list. The change sponsor engaged with the majority of NATMAC members, Air Navigation Service Providers (ANSPs), local aviation users, a number of airfields and airstrips and non-aviation stakeholders that were considered suitable for engagement given the location of the proposed TRA. At the start of the engagement period, the change sponsor engaged with a total of 45 stakeholders, as listed below:

Airports/Airfields/Airstrips (2): Badminton Airstrip, Bristol Airport

ANSPs (2): Bristol ATC, Cardiff ATC.

Aviation Clubs/Organisations (9): Bristol and Gloucestershire Gliding Club, Bristol Radio Control Model Aircraft Club, British Model Flying Association, Cotswold Gliding Club, Gordano Model Flying Club, Great Western Air Ambulance, Landit RC, Maritime and Coastguard Agency, South Wales Gliding,

NATMAC Members (19): Aircraft Owners and Pilots Association (AOPA), Airfield Operators Group (AOG), Association of Remotely Piloted Aircraft Systems UK (ARPAS-UK), Aviation Environment Federation (AEF), British Balloon and Airship Club, British Business and General Aviation Association (BBGA), British Gliding Association (BGA), British Hang Gliding and Paragliding Association, British Helicopter Association (BHA), British Microlight Association (BMAA), British Model Flying Association (BMFA), British Skydiving, Drone Major, General Aviation Alliance (GAA), Honourable Company of Air Pilots (HCAP), Helicopter Club of Great Britain (HCGB), Light Aircraft Association (LAA), Ministry of Defence-Defence Airspace and Air Traffic Management (MoD-DAATM), NATS (NERL).

Non-Aviation Stakeholders (13): Avon and Somerset Police, Bristol Harbour, Gloucester Police, Gwent Police Force, National Grid, National Fire Chiefs Council, National Police Chiefs Council, Natural England, Natural Resources Wales, Nuclear Restoration Services for Berkley, Nuclear Restoration Services for Oldbury, Royal Society for the Protection of Birds Newport Wetlands, The Bristol Port Company,

One week into the period of engagement, the change sponsor was informed of a number of other airstrips, along with Newport, City Airfield and Mendip Gliding Club, who do not appear to have contacted at the start of the period of engagement.

Responses were also received from stakeholders not previously identified. These amounted to a total of 32 stakeholders, which included 12 private individuals who were listed as local airspace users. There is no rationale as to why any of these were not originally identified and engaged with. These were added to the stakeholder list to receive all future communication, and the responses received were taken into account. The additional stakeholders were as follows:

	<p>Airports/Airfields/Airstrips (12): Bowldown Farm Airstrip, Brown Shuttles Farm Airstrip, Eastbach Airstrip, Charmy Down Airstrip, Doynton Airstrip at Mulberry Farm, Garston Farm Airstrip, Grange Farm Airstrip, Newport City Airfield, Chavenage Airstrip at Orange Grove Barn, Wadswick Farm Airstrip, White Ox Mead Strip, Woolaston Airstrip.</p> <p>Aviation Clubs/Organisations (8): Amcanu Ltd, Avon Hang Gliding and Paragliding Club, Babcock, Mendip Gliding Club, Gama Aviation, Malvern Hang Gliding Club, Mendip Gliding Club, Severn Valley Microlight Club.</p> <p>Private Stakeholders (12).</p> <p>The change sponsor emailed Newport City Council on 13th February 2025, requesting the status of Newport City Airfield. A reply was sent later that day explaining that the airfield does not currently have planning permission, although it appears to contain a grass strip that can be used up to 28 days per year under permitted development rights. Table 8 in the Submission Document indicates an attempt was made to contact the owners of this airfield, although no response was received.</p> <p>The change sponsor included a separate table (table 9) within Appendix A, detailing the rationale for not engaging with the remaining NATMAC members and other suggested stakeholders who may be impacted by the proposal. Further analysis of the table omits any of the remaining NATMAC members, despite 14 not being engaged with (Airlines UK, Airports UK, Airspace Change Organising Group (ACOG), British Airways, BAE Systems, British Airline Pilots Association (BALPA), Guild of Air Traffic Controllers (GATCO), Isle of Man CAA, Low Fare Airlines, Military Aviation Authority (MAA), Navy Command HQ, UK Airprox Board (UKAB), UK Flight Safety Committee (UKFSC), United States Visiting Forces and HQ United States Country Rep-UK). The only rationale provided for not engaging with these remaining NATMAC members was provided in section 5 of the submission document, which states that engagement was limited to those members who operated within the vicinity or could have a specific interest in the trial.</p> <p>The table did include a list of six local airstrips (Chase Farm, Frampton Cottrell, Latteridge, Michaelwood, Oldbury-on-Severn and Westland Farm) that were not engaged with by the change sponsor, with specific reasons summarised in a separate column. These were mostly being unable to find valid and current contact details, although the owner of Oldbury-on-Severn when contacted confirmed that the Airstrip had now closed, and the owner of Westland Farm had already responded as a private individual.</p>	
2	Has the change sponsor explained the engagement methodology / approach used?	YES
	<p>23rd April 2025: The methodology for stakeholder engagement is summarised in the Submission Document and the Engagement Strategy. These detail the approach taken for the one-month period of engagement (including a summary of the engagement activity done prior to November 2024), along with the stakeholders who were engaged with by the change sponsor, as detailed under question 1.</p> <p>The change sponsor produced an Engagement Material document, which outlined the proposal in greater detail. This was</p>	

uploaded to the CAA Airspace Change Portal and was attached to the email that was sent to all stakeholders at the start of the engagement period. The email also summarised the purpose of the trial, the deadline for responses to be received, along with the following email address for responses to be sent to: npas.futures@npas.police.uk. The change sponsor issued a press release on the NPAS website publicising the engagement, which included the length of the engagement period, a link to the CAA Airspace Change Portal and further details of the proposal. A press release was previously issued on 15th August 2024 its intention to conduct BVLOS trials in spring 2025. The NPAS website also includes a webpage titled: 'Uncrewed Aircraft Trials' where all the press releases to date have been issued, along with a frequently asked questions page and details of the engagement period. These details can be viewed here: [Uncrewed Aircraft Trials | National Police Air Service](#). On 26th November 2024, the Flyer magazine website included an article about the proposal, along with details about the engagement period and how responses can be made. This article can be viewed here: [Police drone trial to span Severn Estuary for six months : : FLYER](#).

The change sponsor acknowledged that four stakeholders could not be contacted at the start of the engagement period by email, so the change sponsor sent notifications via the 'Contact Us' tabs on their respective websites. There appears to be no indication as to who these four stakeholders are within either the Stakeholder List, or the Engagement Evidence Pack in Annex A. Whilst the relevant Engagement Material document could not be sent to them directly, the change sponsor stated that these stakeholders were directed to the airspace change portal. Two reminder emails that were sent on 9th December and 16th December 2024 were sent to all remaining stakeholders who had not yet responded. It included the same email address and a deadline date of 22nd December 2024. The Engagement Material document was also re-attached for reference on the final email. Notifications were also sent via the 'Contact U's tabs where stakeholders could not be contacted via email.

Prior to the period of engagement commencing, the change sponsor undertook both MS Teams Meetings, emails and face-to-face meetings with the Great Western Air Ambulance (owners of the Almondsbury site, where the NPAS helicopter operates from), Natural England, Natural Resources Wales, the Bristol Port Co. (owners of Avonmouth Helipad) and Bristol ATC. Further phone calls, MS Teams meetings, emails and phone calls were undertaken with individual stakeholders that were initiated by the change sponsor during and after the engagement period. These were with Cardiff ATC, Newport Council, Newport Airfield, DAATM, MCA, Great Western Air Ambulance, Wiltshire and Bath Air Ambulance, Devon Air Ambulance, and HEMS despatch desk. A summary of this additional engagement has been included in table 4 of the Submission Document.

The Engagement Strategy and Engagement Material document were shared with the CAA for comment in November, and feedback on it was given prior to the engagement period commencing.

29th May 2025 update: Following the post engagement discussions that have taken place with the CAA, along with the two letters sent to the change sponsor regarding the decision to split the trial into a TDA and TRA, the trial under this ACP has been reduced to a 90-day period and changed from a TRA to a TDA. A separate TRA that has been reduced in size with a

	<p>Transponder Mandatory Zone (TMZ) is now subject to a separate ACP process (ACP-2025-022).</p> <p>In the light of the change to a TDA, the change sponsor undertook an additional two-week targeted engagement period on the TDA with DAATM. Other stakeholders were notified. An Engagement Evidence Pack was updated and resubmitted to include a screenshot of an email sent on 14th May, informing stakeholders of the change. The screenshot included email addresses of all stakeholders who were contacted. Where stakeholders could not be contacted by email, notifications were sent via the 'Contact Us' tabs on their respective websites, which was a similar approach used by the change sponsor at the start of the previous engagement period. Screenshots of the notifications sent via respective 'Contact Us' forms was included, and the following five stakeholders were notified in this way: Bristol Radio Controlled Model Aircraft Club, Severn Valley Microlight Club, Wadswick Farm Airstrip, South Wales Gliding Club and National Grid.</p>	
3	What materials have been used by the change sponsor during the targeted engagement?	YES
	<p>23rd April 2025: The emails sent by the change sponsor at the start of the engagement period contained a brief outline of the proposal. The Engagement Material document that was attached to the email explained the proposal in greater detail by outlining its objectives, the current airspace and proposed airspace design and summaries of the impact assessments that had been undertaken by the change sponsor.</p> <p>Specifically, the document articulated the change sponsor's proposal to conduct BVLOS flights using a RPAS within the TRA for a six-month trial period commencing on 29th May and ending on 12th November 2025. It was caveated that this could be subject to a one-month delay, whilst the change sponsor considers the feedback received during the engagement period. The material explained that the proposed TRA is situated over the Bristol Channel, located to the northwest of Bristol and has been split into two-segments to enable individual areas to be activated as required. Avonmouth Helipad will be used as the launch / landing site for the RPAS vehicle within the trial. The proposed TRA is in Class G airspace, up to 4,000ft above mean sea level (amsl). Dimensions of the TRA were also provided, including its vertical limits, along with the proposed daytime and nighttime timings of operation. It was explained that the trial will occur in five stages, with stages 1 to 4 being at night (22:00 – 04:00 local time) operations and stage 5 being conducted at daytime (10:00 – 15:00 local time). All operations will occur between c 900ft and 1,200ft amsl and the RPAS will typically transit at c1,000ft amsl. Routes to be flown will be pre-planned and Bristol ATC will be notified ahead of a launch.</p> <p>A screenshot of the latest 1:500,000 VFR aeronautical chart with the proposed TRA overlain was also included, along with a separate aerial photo showing the TRA divided into two sectors. The material also articulated that either the southern sector (where the Avonmouth Helipad is located within), or both will be activated. These will be explained via NOTAM at least 24hrs in advance of a BVLOS flight.</p> <p>Section 6 of the Engagement Material document included a 'How to Respond' section which contained the same email address that was included within the initial engagement email, along with the closing date for the period of engagement. There were also</p>	

	<p>six optional feedback questions contained within the document that centred on the dimensions of the TRA, the nighttime operating times and phased approach to the trial. A link to the relevant documents that had been uploaded to the CAA Airspace Change Portal was also included.</p> <p>29th May 2025 update: The notification email sent to 93 stakeholders outlined the intention to use a TDA for the first 90 days of the trial at nighttime only. Although no specific times and dates were included in the email, a link to the Airspace Change portal was included where a revised Stage 4 submission document had been uploaded detailing both the proposed TDA and TRA. Trial dates for the TDA are proposed to take place from Thursday 3rd July to Wednesday 1st October 2025 and this is outlined in section 2.7 of the submission document. Paragraph 4.2.2 within section 4.2 outlines the proposed hours in which the TDA will be activated which is from 22:00 to 04:00 Monday to Friday. Figure 5 within the submission document has also been amended to include an area of operation, mission areas, transit corridors, obstruction area and the take-off/landing area.</p> <p>Separate updated engagement material was sent by the change sponsor to DAATM and HeliMed which provided details of the proposed TDA. Separate emails were also sent requesting feedback. DAATM is content that a suitable plan for airspace access has been provided during the trial period and its nighttime activation will reduce the likelihood for airspace access requests. DAATM also confirmed that they do not wish to be party to a LoA. Wiltshire & Bath Air Ambulance see no change to what has already been agreed and the Great Western Air Ambulance Charity confirmed they will not be flying during the TDA's activation times. HeliMed also confirmed they do not wish to be party to a LoA.</p>	
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>23rd April 2025: Section 5.2 of the Submission Document and Section 7 of the Engagement Strategy outline the period of engagement which lasted for four weeks and three days which started on Friday 22nd November 2024 and ended on Sunday 22nd December 2024. The rationale provided by the change sponsor for the length of the engagement was due to the scale of the proposal, being a TRA for a six-month trial period. CAP1616g suggests that a six-week engagement period is a reasonable starting point and CAP2989 states that it should be for a minimum of four weeks; the shorter period reflecting the fact that the impacts of the proposed airspace are likely to be low.</p>	
5	Was the period of engagement appropriate?	YES
	<p>23rd April 2025: Whilst the change sponsor was criticised for not initially contacting a number of airfields and local organisations at the start of the engagement period, these were subsequently notified of the proposal and engagement period, which lasted for just over four weeks. On balance, due to the type and scale of the proposal, the engagement length was considered to be proportionate and appropriate, due to the type and scale of the proposal.</p> <p>The change sponsor was proactive in contacting some stakeholders individually, prior to the engagement period and after it</p>	

	had ended. Replies to feedback received during the engagement period were also sent. A summary of additional engagement activities in the form of emails, phone calls, MS Teams and face-to-face meetings were conducted from October 2023 through to March 2025. The content of the emails sent at the start of the engagement period and the reminder emails that were sent on 9 th December and 16 th December 2024 also demonstrate the change sponsor being proactive to all stakeholders who were contacted. The evidence submitted demonstrates that, on balance, effective two-way engagement was achieved.	
6	Has the change sponsor accurately summarised what stakeholders have said and identified all the issues raised during the engagement in the stakeholder engagement summary document? Does the stakeholder engagement summary document detail the change sponsor's response to the identified issues?	YES
	<p>23rd April 2025: The change sponsor listed 41 stakeholders as providing feedback in section 5.3 and Appendix A of the Submission Document. 22 of these respondents were stakeholders who were not initially contacted by the change sponsor at the start of the engagement period. The remaining 19 responses were from the 45 stakeholders who were contacted at the start of the engagement period. Responses received from Amcanu Ltd, ARPAS-UK, the GAA, Gordano Model Flying Club, Grange Farm Airstrip, the LAA, MoD-DAATM, South Wales Gliding, along with responses from eight private individuals resulted in a subsequent design change to the final proposal.</p> <p>Responses received from Avon and Somerset Police, Avon Hang Gliding and Paragliding Club, Babcock, Bristol and Gloucestershire Gliding Club, the British Hang Gliding and Paragliding Association, the British Helicopter Association, Charmy Down Airstrip, Cotswold Gliding Club, Gama Aviation, Gloucestershire Police Force, Great Western Air Ambulance, Gwent Police Force, Malvern Hang Gliding Club, Doynton Airstrip, National Fire Chiefs Council, NATS (NERL), Natural England, Nuclear Restoration Services for Oldbury, Chavenage Airstrip at Orange Grove Barn, the RSPB, Woolaston Airstrip along with responses from four private individuals did not result in a design change to the final proposal.</p> <p>The responses received have been briefly summarised and included in table 5 of the Submission Document. These have been categorised into the following themes: safety, airspace access, airspace design, engagement/consultation, environment, general, operations, and other airspace users. Miscellaneous responses and no further comments have also been included for completeness. A more detailed response from the change sponsor to each of the identified themes has been included within an adjacent column in the table and whether any of the responses that fall within these themes are considered to be of a potential impact to the design of the TRA, and subsequently resulting in a design change to it. There are multiple rows for each theme within the table, and a list of stakeholders whose response falls within each theme has been included. All responses received have been included in Annex A of the submission as screenshots.</p> <p>Five objections were received during the period of engagement, from four private individuals and Charmy Down Airstrip. Table 5 did not summarise these objections, as they were simply listed as 'object' and categorised within the general responses theme. The change sponsor has included an acknowledgement to these objections within the table, and the issues raised have been included within the other themes that have been included within table 5, with appropriate responses given. These</p>	

	<p>objections have been submitted by GA pilots who have concerns relating to the design of the TRA restricting the use of Class G airspace.</p> <p>Annex A includes evidence of the change sponsor acknowledging each submitted response and attempting to respond to each of them that have raised specific queries and concerns regarding the TRA. These responses from the change sponsor have been summarised within table 5.</p> <p>All of the responses received were during the one-month period of engagement. The additional stakeholder engagement that is summarised in table 4, which was undertaken prior to and after the period of engagement was predominantly undertaken via MS Teams, phone calls and a face-to-face meeting, and were not therefore included as formal responses. However, all of these stakeholders were engaged with at the start of the engagement period and some submitted responses which are summarised in table 5.</p> <p>The change sponsor has produced and submitted a draft LOA and TOI for consideration. These should be finalised and completed before activation. This is addressed as a condition under section 11. The LOA is between [REDACTED], [REDACTED].</p>
7	<p>Is the change sponsor's response to the issues raised appropriate/adequate?</p> <p>YES</p>
	<p>23rd April 2025: The change sponsor has provided appropriate and adequate responses to each individual item of feedback received which are summarised in table 5 of the Submission Document. Summaries of the responses received, along with the change sponsor's response are outlined below in the following themes:</p> <p>Safety</p> <p>Feedback received from six stakeholders centred around the operational aspects of the drones, in terms of it not being able to detect and avoid passing GA traffic, use of untested aircraft, and concerns of ground risk of the UAS. Drones should have ADS-B fitted and drones that have certified detect and systems should be allowed to operate outside of dedicated test areas. The Gordano Model Flying Club, whose operational area is within the TRA boundary stated that their operations cannot guarantee individual user compliance with TRA restrictions.</p> <p><u>Change sponsor's response:</u> Confirmed that the aircraft to be used in this trial is not untested, as it is a Schiebel S-100 Camcopter which will be equipped with EC including ADS-B and a Mode S transponder. It will be operated under a CAA approved OSC which includes ground risk mitigations. The lateral dimensions of the TRA have been developed to minimise ground risk. With regard to the concerns raised by the Gordano Model Flying Club, the lateral dimensions of the TRA have been altered and the club's site and operational area will no longer be within the boundary.</p>

Airspace Access

Feedback received from 10 stakeholders that included six private stakeholders, Amcanu, the GAA, Grange Farm Airstrip and the MoD concerned the TRA potentially blocking east/west routes and/or north south routes and/or coastal routes. One of the private stakeholders considered that access via NPAS is not practical given the short notice changes to the TRA. Other comments received queried the details of the NOTAM, access to the TRA with a transponder, approval needed for entry to the TRA and whether a number will be provided. A transit route was also suggested, along with reducing its vertical limit. Avon and Somerset Police requested that the NOTAM contains a paragraph detailing any exceptions to the transponder and notification process. ARPAS-UK, Babcock and Gloucester Constabulary queried provision for other drone users to operate under 400ft AGL.

Change sponsor's response: Clarified that the TRA activation will be notified via NOTAM at least 24 hours in advance. Contact details for NPAS and Cardiff ATC will be provided in the NOTAM. Changes to the TRA have been made in the light of concerns raised surrounding the TRA blocking routes for GA pilots. These changes consist of the upper vertical limit of the TRA being reduced to better facilitate overflights of the TRA and the lateral dimensions of the TRA being reduced leading to a smaller area being taken to the North, East and Southeast of the Severn Estuary. This provides a North-South route along the M5 on the eastern side of the Severn Estuary and an East-West route to the North and South of the TRA. The segmentation has also been altered, reducing the area taken for daytime activities to the West of the Severn Estuary. This will provide a North-South route on the Western side during the day and facilitate continued operations at Newport City Airfield.

Confirmed that aircraft planning to enter the TRA must request entry prior to ensure that the drone operator is aware of other traffic in the area. All aircraft will need to contact Cardiff ATC prior to entering the TRA after receiving approval from NPAS, except for emergency services responding to an incident who do not require prior approval from NPAS due to the time critical nature of their operation. The aircraft will need to be equipped with a CAA UK approved Mode-A or Mode-S transponder, emit ADS-B out and be able to establish and maintain contact with Cardiff ATC. There is a small chance that someone who wishes to enter the TRA during stages 2 and 3 could still be denied entry on safety grounds depending on the activities taking place at the time. Emergency services responding to an incident will be granted entry, via Cardiff ATC. NPAS will try to accommodate requests for entry and may suggest transit through a different part of the TRA to facilitate a crossing away from where the trial aircraft is operating. With regard to the request from Avon and Somerset Police, emergency service drones should continue to operate in accordance with their Standard Operating Procedures (SOPs) and continue to contact the NPAS Operations Centre. The change sponsor also confirmed that anyone operating a UAS within VLOS can still do so in the area without a transponder.

Airspace Design

Feedback was received from 13 respondents, including six private stakeholders, concerning the design and location of the TRA and amendments to it, including moving it further south, the southern extent of the boundary is displaced north of the helipad, aligning a segment of the TRA with the M5, reducing its size and limiting it to be only over water. Specifically, five stakeholders including the MoD stated that the boundary of the TRA (top 1,700ft) abuts Bristol CTA 2 (base 1,500ft) leading to potential infringements or unnecessary track miles / overwater flying to get to the required height. Gordano Model Flying Club suggested

geofencing a 500m radius around the model flying club site.

Change sponsor's response: Moving the TRA is not possible due to the Bristol CTAs and it need to be of a certain size to accommodate trial activities. With regard to activities over water, some activities will occur over land so that NPAS can assess how the use of a remote platform can carry out police tasks. The TRA has been designed to reduce the number of significantly populated areas whilst still providing enough lateral area to complete testing.

The upper limit of the TRA during daytime trial operations (Stage 3) has been reduced from 1,700ft to 1,200ft AMSL.

The upper limit of the TRA during all nighttime operations (Stages 1-3) has been reduced from 1,700ft to 1,400ft AMSL.

The lateral dimensions of the TRA have also been altered so that the boundary no longer abuts Bristol CTA 2 but runs parallel to it. These adjustments to both the lateral and vertical dimensions of the TRA will ensure that aircraft can remain outside of either piece of airspace. With regard to the concerns raised by Gordano Model Flying Club, the lateral dimensions of the TRA have been altered and the Gordano Model Flying Club site and operational area is no longer within the boundary.

Engagement and Consultation

12 respondents, including seven private stakeholders provided feedback that had been included within the engagement category within table 5. Three private stakeholders emailed to say they had not been notified of the engagement and one was also concerned that the length was insufficient. Six also suggested further stakeholders who should be notified of the proposal.

Concern was also raised with regard to the outline of the TRA being close to the edge of the aeronautical chart and clarification was also sought from four stakeholders with regard to the upper limit of the TRA; specifically, the Bristol & Gloucestershire Gliding Club requested a clarification to their response concerning the proposed TRA being in Class G airspace, up to 4,000ft above mean sea level (amsl), whilst the vertical limits of the TRA are from the surface to 1,700ft amsl.

Change sponsor's response: Notifications of the engagement were sent via email and a press release was included on the NPAS website and other news outlets including the Flyer magazine website. Responses were received from additional stakeholders who were not directly engaged with. The change sponsor considered the length of engagement to be proportionate, and the material used within the engagement was considered to be satisfactory.

Additional stakeholders who were identified during the period of engagement were sent or directed to where the engagement material could be found, and a list was included within the final submission. A copy of the reply sent by the change sponsor to the Bristol & Gloucestershire Gliding Club on 12th December 2024, following their clarification request sent on 11th December, was included as a screenshot within Annex A.

Environmental

Natural England considered there to be no significant impact on nature sites, due to minimum drone height. Feedback received from the RSPB outlined the potential to impact birds around the Severn Estuary which should be address via monitoring and

considered that Natural England and Natural Resources Wales would want a HRA to be completed. Comments submitted from two private stakeholders questioned the internal combustion engine of a drone being quieter than an electric one.

Change sponsor's response: Confirmed that a HRA screening form has been submitted for consideration and Natural England and Natural Resources Wales have been engaged with. With regard to drone noise, the engagement material compared the frequency of noise emitted between an electric drone and the single rotor RPAS to be used in the trial. This is based on paragraph 11.8 in CAP1616i which discusses tones produced by multi-rotor RPAS and was not a comparison of noise levels.

General

Seven stakeholders considered that the proposal will have no impact on their operations, with two stakeholders supporting the proposal (Gloucester Constabulary and Gwent Police). Five objections were received. Magnox Oldbury requested that prior notification is received of any operations.

Change sponsor's response: All responses were acknowledged. The change sponsor will only notify Magnox if a trial activity plans to cross either R154 or R155 routes as per the prior agreement. Responses to the objections have been included separately within the other categories.

Miscellaneous

Seven stakeholders provided feedback on a range of queries, including a concern that the trial could lead to permanent segregated airspace and whether the activities proposed can be achieved another way? Clarification was sought on the proposed assessment of RADAR units and what additional data will be collected compared to Babcock/Bristow current operations? There was also concern that the trial could lead to the trial being replicated elsewhere.

The GAA, along with two private stakeholders suggested the use of existing danger areas/UAS test areas, as Llanbedr Airport which has allocated airspace for drone trials.

Change sponsor's response: Clarified that there is no intention to make this TRA a permanent airspace change, as it includes a focus on proving a detect and avoid capability that may result in reductions in segregated airspace for BVLOS operations. The trial will be an assessment of the onboard RADAR on the trial aircraft. With regard to the LAA's concerns, the change sponsor stated that activities have been developed to enable it to meet the trial objectives which include determining if RPAS can be an effective addition to existing crewed aircraft for emergency services. In response to the GAA, it was made clear that the trial is part of a CAA initiative with the intent to gather data that can aid policy on future integrated airspace.

The trial is independent of current Babcock/Bristow operations, as it focuses on proving a detect and avoid capability that may enable future reductions in segregated airspace for BVLOS operations.

Operations

Feedback received from six stakeholders centred around weather flying minima, including cloud base levels, along with a request that the TRA is deactivated early if operations finish early. There was also concern that daytime activities should not be extended and a query concerning the existence of an LoA and whether Cardiff ATC is the controlling authority. Questioned the safety reasons requiring stage 1 VLOS flying to be in segregated airspace.

Change sponsor's response: Confirmed that a draft LoA exists between NPAS and Cardiff ATC, as they are the airspace authority. The TRA will be only be activated for the minimum amount of time each day and a cloud base minima has not been introduced, in order to ensure the trial objectives can be achieved. Confirmed that during stage 1, there will be testing of the trial operation safety mitigations so entry to the active TRA segment has been restricted during this short phase as an extra safety measure.

Other Airspace Users

Feedback from 14 stakeholders (that included seven private stakeholders) considered that trials conducted at night will reduce the impact on their operations. Four stakeholders considered that such activities will have minimal impact with a further two limiting this to the southern sector, although the MoD, along with four other stakeholders, stated the potential for significant impact on operations. There was also concern over potential conflict with the drone given the proposed heights it could be flying at. The LAA considered there was not enough information provided to assess the level of impact. With regard to the use of EC and transponders, feedback was submitted from seven stakeholders stating that some airspace users do not have EC, or transponders fitted which do not transmit their position. One private stakeholder's feedback reiterated that the use of a transponder should not be required, as it's not needed to transit Class D airspace. Gwent Police and Avon and Somerset Police confirmed that the trial won't affect high priority traffic.

Change sponsor's response: Confirmed that the majority of trial activities will occur at night and daytime TRA activation will be minimised to reduce the impact on other airspace users. Regarding concerns raised by the MoD and other stakeholders regarding the potential for impact on operations, amendments have been made to the TRA that reduce the lateral and vertical dimensions of the TRA, changing the segmentation and changing the ATC Service Provider.

With regard to the use of transponders, any manned aircraft equipped with a CAA UK approved Mode -A or Mode-S transponder, that emits ADS-B out and can establish and maintain contact with Cardiff ATC can request entry during trial stages 2 and 3. Emergency services responding to an incident will be granted entry to the TRA during any trial stage. Although a transponder is not a requirement for other classes of airspace, the requirement for any manned aircraft to be equipped with a CAA UK approved Mode-A or Mode-S transponder is in place to enhance situational awareness during this trial.

It was reiterated that any manned aircraft that doesn't meet the TRA entry requirements will be able to fly over or around the TRA. The lateral and upper vertical limit of the TRA have been reduced to better facilitate this. Anyone operating an Unmanned Aircraft System (UAS) within Visual Line of Sight (VLOS) can still do so in the area without a transponder in line with UK Regulation, subject to compliance with the usual CAA requirements for UAS operation in their category.

	With regard to the LAA's concerns regarding the lack of information, the change sponsor did not send additional material, as nothing specific was requested. Full details were on the Airspace Change Portal.	
8	Has the change sponsor set out how they will collate, monitor, and report to the CAA on the level and content of the complaints?	PARTIALLY
	23rd April 2025: Neither the Submission Document, nor the Engagement Strategy outline how the change sponsor intends to collate, monitor, or report on the level and content of complaints. As this is a CAP1616 requirement, this can be addressed by way of a condition under Section 11.	
9	Is the proposal likely to affect traffic operating below 7000ft over an inhabited area? If yes, has the change sponsor provided the brief impact analysis to explain the likely impacts and explained how they will inform relevant community stakeholders?	PARTIALLY
	<p>23rd April 2025: The revised TRA will extend from the surface to 1,200 feet AMSL during the daytime and 1,400 feet AMSL at nighttime. Whilst the TRA is predominantly situated over the Bristol Channel to the northwest of Bristol, parts of the TRA cover the settlements of Chepstow, Magor and Caldicot in Wales. Magor is located on the edge of the central and western edges of the TRA, whilst Caldicot is located within the central sector and Chepstow within the northern sector. Whilst splitting the TRA into these three sectors means individual areas can be activated as required, the central sector will be activated at a minimum for every activity, as the launch site for RPAS is located within this sector.</p> <p>The change sponsor has not provided specific routes, as instead, it is stated that routes will be planned in advance and developed to minimise the number of properties overflown. In addition, the change sponsor has also indicated that the majority of flights will take place over water, further reducing potential noise impact. However, there is still the potential for the RPAS to overfly these settlements within the TRA. Whilst section 11 of the Submission Document contains a noise assessment which states that the RPAS to be used in this trial is quieter than the traditional crewed helicopter currently used by NPAS and will be equipped with a noise dampener to reduce noise output further, when measured at a lateral distance of 25m (82ft) the RPAS with dampener peaked at 82dB L_{AFmax}. Using the inverse distance law for sound pressure levels, the formula to determine how noise decays with distance, it has been calculated that at a distance of 1,000 ft, typical transit altitude, the RPAS should emit 60dB L_{AFmax}. As the RPAS will typically fly between 900 and 1,050 feet AMSL, noise levels may exceed 60dB when flying at the lower end of this altitude range.</p> <p>The thresholds outlined in paragraph 6.30 of CAP1616g state that noise impacts that exceed 65dB from day flights (0700 to 2300) and 60dB from night flights (2300 to 0700), communities must be informed. This can therefore be addressed by way of a condition under Section 11, as it is a CAP1616 requirement.</p>	
10	Taking the above considerations into account, does the SME recommend that this proposal has met the engagement requirements of the Temporary Airspace Change process?	YES

	<p>23rd April 2025: The period of engagement was proportionate, and the change sponsor has provided a satisfactory rationale for the list of stakeholders it had identified and engaged with, along with the ones that haven't. Evidence has been submitted of the change sponsor being pro-active, prior to and during the period of engagement. Evidence of all the engagement sent during the period of engagement emails sent have been provided.</p> <p>The change sponsor has clearly outlined the actions that will be taken following the feedback that has been received, along with the changes to the design of the TRA, within table 5 and summarised within table 6 of the Submission Document. These are:</p> <ul style="list-style-type: none"> • A reduction in the height of the vertical limits of the TRA from 1,700 feet to 1,400 feet AMSL and 1,200 feet for daytime activations. • A reduction in the typical operating altitude from 1,200 feet AMSL to 1,050 feet AMSL. • An increase in the number of TRA sectors from two to three (Sector 1 which is the centre of the TRA, south of the M4 Motorway, sector 2-southwest and sector 3-north). Amended co-ordinates have been provided. Section 3.2 of the Submission Document shows the amended TRA overlain onto a screenshot of the latest 1:500,000 VFR aeronautical chart showing the heliport (which is the launch site for RPAS) situated within the central sector, along with the proposed vertical limits of the TRA (SFC to 1,400ft AMSL during daytime activations and 1,200ft AMSL at nighttime). • Change in ATC service provider from Bristol to Cardiff following engagement with them (although no justification was provided for this change). <p>29th May 2025: The additional targeted period of engagement with DAATM on the TDA was considered proportionate, given the 90-day trial will be conducted at night and the concerns that were raised by DAATM during the previous engagement period for the TRA. Other stakeholders were notified, as operations conducted at night will have less of an impact.</p>	
11	Are there any Condition(s) which the change sponsor must fulfil before activation (if approved)? If yes, please list them.	YES
	<ul style="list-style-type: none"> • The TOI and the LOA mentioned in the final submission between [REDACTED] are produced. Evidence can be provided that these documents are in draft. If the final Decision is to approve the ACP, finalised and signed copies of these agreements will be required before the CAA approves activations of the TDA. • The change sponsor should inform the stakeholders of the decision (when published), likely impacts and what will happen next. • Provide a brief impact analysis to explain the likely impacts and explain how relevant community stakeholders will be informed. • The change sponsor is required to collate, monitor, and report to the CAA on the level and contents of feedback received during the period of the TDA. The CAA expect reporting on the level and contents of any stakeholder feedback received on a fortnightly basis throughout the duration of the TDA (this should include nil returns). The change sponsor should send these reports to the assigned Account Manager/Case Officer. 	

[Redacted]

Targeted Engagement Assessment sign-off			
	Name	Signature	Date
Assessment completed by Airspace Regulator (Engagement and Consultation)	[Redacted]	[Redacted]	23 rd April 2025

[Redacted]