



6 April 2022

USE OF NAVIGATION WARNINGS TO ENABLE BVLOS RPAS OPERATIONS AT KEEVIL

Introduction

The MOD's Keevil ACP (ACP-2021-006), aimed at enabling BVLOS RPAS operations, contains two options within the Stage 2 Options Development that are being considered for achieving the element of segregation required by regulations.

- Use existing airspace structures.
- Introduce a new Danger Area.

Based on the information available to the CAA at this time, the CAA is concerned that the option to use 'existing airspace structures' being considered by the Sponsor may not achieve the segregation required to support BVLOS operations from Keevil for the following reasons:

- The publication and charting of the airspace is to provide navigation warnings of the gliding and parachuting activities to other airspace users.
- The airspace is not under the jurisdiction of one aviation authority and is not allocated to a specific user.
- The airspace does not prevent access to other airspace users.
- The conduct of BVLOS activities would not be notified to other airspace users, as the navigation warnings are associated with the gliding and parachuting activities only.
- The navigation warning associated with each area only applies when that activity is taking place eg the navigation warning for gliding operations only applies when the gliding is taking place, and would not apply if only BVLOS RPAS operations were taking place.

We explain some of these aspects in further detail below.

For these reasons, the Sponsor may want to consider whether the option to use 'existing airspace structures' should be consulted on or considered further as part of the CAP1616 airspace change process.

This statement does not predetermine the CAA's later final decision on whether to approve the airspace change proposal, nor does it change any of the requirements of CAP1616.

Status of Navigation Warnings at Keevil

The 'existing structures' referred to by the Sponsor are those relating to the parachute and gliding activities at Keevil. These are activities notified in AIP ENR5 (Navigation Warnings) within ENR5.5 (Aerial Sporting and Recreational Activities), and whilst there are notional dimensions, these are not deemed to be airspace structures that imply any restrictions, reservations, or conditions for entry. In addition, they do not authorise any specific activity or imply any rights to a specific airspace user. The intention is to provide navigation warnings to other airspace users to enable effective pre-flight planning and in-cockpit decision-making; the **general advice** is to avoid the areas if they are known to be active (or if the status of activity cannot be confirmed).

Other Factors

There are other factors that impact on the effectiveness of an airspace design, such as the provision of services eg ATS, DACS and DAAIS, and airspace management. These can influence safety cases and how impactful airspace structures are on other airspace users, such as by providing a means of safe access. While these matters have yet to be fully developed within the Keevil ACP, the Sponsor should consider the impact of these factors on the ability for existing navigation warnings to segregate other airspace users from the proposed BVLOS activity.