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**MINUTES OF ASSESSMENT MEETING FOR ACP-2024-012  
AMENDMENT TO BVLOS LIMITATIONS FOR EG D207 HELD ON 16 APR 2024**

22 Apr 2024

All present

<b>Present</b>	<b>Appointment</b>	<b>Representing</b>
	Airspace Regulator	CAA
	Airspace Regulator	CAA
	Hd Airspace Integration DLOD & Capability	
	Acceptance (Protector)	MOD
	SO2 Airspace	DAATM
	ACP ATM Team	QinetiQ
	ACP ATM Team	QinetiQ
	ACP ATM Team	QinetiQ

**Airspace Change Assessment Meeting Opening Statement**

CAA noted that the Statement of Need, an Assessment Meeting agenda and a presentation were received in advance of the Assessment Meeting and confirmed that the documents must be published by the sponsor, together with minutes of the meeting, on the Airspace Change Portal page. CAA explained the purpose of the meeting and confirmed that the meeting was an Assessment Meeting and not a Gateway. The CAA reinforced that the sponsor was required to provide a broad description of their proposed approach to meeting the CAA's CAP 1616 requirements, but the CAA was not deciding whether the proposed approach met the detailed requirements of the CAA's process at this stage. The purpose of the Assessment Meeting (set out in detail in CAP 1616) was broadly:

- for the Sponsor to present and discuss their Statement of Need,
- to enable the CAA to consider whether the proposal concerned falls within the scope of the formal airspace change process, including determining whether the proposal falls within the scope of a pre-scaled ACP process/Level 3,
- to enable the CAA to consider the appropriate provisional Level to assign to the change proposal.

Additionally, the sponsor was required to provide information on how it intended to proceed to fulfil the requirements of the airspace change process and to provide information on timescales. Lastly, the sponsor was required to provide information on how it intended to meet the engagement requirements of the various stages of the airspace change process.

	<b>ACTION</b>
<b>Item 1 – Introduction</b>  1. All attendees were introduced.	

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<p><b>Item 2 –Statement of Need (discussion and review)</b></p> <p>2. The MOD introduced the Statement of Need (SON) as published on the CAA ACP portal as follows:</p> <ul style="list-style-type: none"> <li>• In order to provide immediate flexibility for scheduled T&amp;E activity and for subsequent steady-state live-flying training, MOD is seeking to make EG D207 accessible to RPAS Protector RG Mk1 from mid-2024. Access to EG D207 is required above FL195 but the current BVLOS upper limit is 18,000 FT ALT, so amendment to / dispensation from current internal buffers is required.</li> </ul>	
<p><b>Item 3 – Issues or opportunities arising from proposed change</b></p> <p>3. The ability for MOD to access EG D207 is thought to relieve pressure on the EGD323 complex in the vicinity of main operating base RAF Waddington during the introduction of Protector into the UK airspace.</p>	
<p><b>Item 4 – Options to exploit opportunities or address issues identified</b></p> <p>4. <b>Option 1 - No amendment to UK AIP:</b> MOD could agree operating limits and mitigations with NATS via a safety argument to afford Protector RG Mk1 access to EGD207 from above FL195 and to operate safely in EGD207. This would require dispensation from the current limitation of <i>no BVLOS activity above 18,000 FT ALT</i> during those stages of flight involved with ingress and egress.</p> <p>5. <b>Option 2 - Amendment to UK AIP:</b> Alternatively under new Special Use Airspace (SUA) Policy the limitation on BVLOS activity in EGD207 could be removed and procedures agreed with NATS, such that Protector (and other RPAS) would be clear to enter and depart via Class C airspace above. This would require an ACP in order to amend the UK AIP and would require considerably more time to achieve. It would also require the establishment of a 1nm flight plan buffer zone (FBZ).</p> <p>6. It is thought that the Option 1 would be the quickest solution as it could to provide access to EGD207 for Protector as early as Jul 2024 (the MOD aims to commence T&amp;E flying for Protector in Jul 2024 with an aim to access EGD207 shortly after). As Option 1 would not amend the AIP or change the airspace design CAP 1616 would not apply, so it is the MOD's preferred option. However, the current BVLOS limitations would remain extant and any operational agreements between NATS and the MOD would be limited to the specified BVLOS UAS operations.</p> <p>7. However, in order to prepare the way for all eventualities, the Change Sponsor asked the CAA to complete the assessment meeting in case Option 2 needed to be invoked and an ACP was required.</p>	

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**Item 5. Current day scenario**

8. The current airspace is depicted at Figure 1.



Figure 1- Current airspace chart showing EGD207

9. The use of EGD207 is as follows:

- Upper limit of EGD207 is 23,000 FT ALT;
- RPAS BVLOS may not be conducted above 18,000 FT ALT (12,000 FT ALT in the event of the activation of Contingency Airway T999) - UK AIP annotation;
- The limitation prevents Protector's access to EGD207 from above FL195 where the DA abuts Class C airspace;
- It is understood that possibly as early as Q3 2026 detect and avoid (DAA) will be delivered to Protector, which will afford it less restrictive access to Class G airspace.

**Item 6 – Provisional indication of the level and process requirements**

10. If Option 2 was to be pursued, the CAA thought that it was likely to be a Level 3 ACP, but this would need to be confirmed once the way ahead has been decided by the sponsor.

11. The requirements of a Level 3 ACP are laid down in CAP 1616h; the CAA did not foresee any additional requirements but this would be confirmed once a way ahead had been decided. CAP 1616h states what needs to be uploaded to the CAA ACP portal and by whom.

12. Specific to Level 3 ACPs:

- Habitats Regulations Assessment, to assess the potential adverse effects on European Sites;
- The 3 mandatory Design Principles (DPs) – safety, policy and environment - must be included although a qualitative assessment is acceptable as opposed to a full DP evaluation. Sufficient detail must be provided for the CAA to be able to make a decision;
- Engagement – the CAA would provide further guidance on the need for a specified engagement period depending on the option selected;
- Submission – Change Sponsors should use the template in CAP 1616f. Level 3 ACPs are not required to complete the whole submission template, but may choose applicable headings for presentation to the CAA (further advice may be provided on relevance and proportionality if unclear).

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<p>13. Gateways:</p> <ul style="list-style-type: none"> <li>• There are no gateways for Level 3 ACPs;</li> <li>• The MOD can ask the CAA to review relevant parts of the submission at earlier stages, but this would need to be brought to the attention of the CAA in order to manage workload and factor into timeline requirements;</li> <li>• Likewise the CAA can ask to review documents at interim stages, but most likely to ask for formal submission at Stage 4.</li> </ul>	
<p><b>Item 7 – Provisional timescales</b></p> <p>14. It was agreed that timescales would not be discussed at this point; the CAA would await to hear whether the MOD needed to pursue Option 2 in which case timescales would be revisited. In the meantime the Change Sponsor would pursue Option 1 with NATS and report back to the CAA on progress.</p> <p><i>* The timeline agreed may become subject to change by the CAA. As outlined in CAP 2541 it is not the CAA's intent to conduct a re-prioritisation of all ACPs currently in progress, but only to prioritise when we believe this is required. Such prioritisation will be conducted on a case-by-case basis and in accordance with the principles outlined in CAP 2541. Should it be considered necessary to reprioritise an ACP a member of the Airspace Regulation team will contact the sponsor directly.</i></p>	
<p><b>Item 8 – Next steps</b></p> <p>15. <b>Action:</b> Change Sponsor is to advise which option is to be followed as soon as it becomes clear.</p> <p>16. A draft copy of the minutes of this meeting should be sent to the CAA by 23 Apr 2024 for return of comment. A complete version was to be agreed and presented to the CAA, whilst a redacted version was to be placed on the portal by 30 Apr 2024.</p> <p><b>Action:</b> Change Sponsor to provide draft minutes to CAA for internal review by 23 Apr 2024.</p>	<p><b>Change Sponsor</b></p> <p><b>Change Sponsor</b></p>
<p><b>Item 9 – Any Other Business</b></p> <p>17. Nil.</p>	

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**ACTIONS ARISING FROM ACP-2024-012  
AMENDMENT TO BVLOS LIMITATIONS FOR EG D207  
ASSESSMENT MEETING**

<b>Subject</b>	<b>Name</b>	<b>Action</b>	<b>Deadline</b>
Options	Change Sponsor	To advise which option is to be followed as soon as it becomes clear	ASAP
Minutes	Change Sponsor	To provide draft minutes to CAA for internal review	23 Apr 2024

MOD  
ACP Sponsor

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