

CAA Operational Assessment

Title of airspace change proposal	NPAS BLVOS
Change sponsor	NPAS
Project reference	ACP-2024-035
Account Manager	
Case study commencement date	23 Apr 25
Case study report as at	02 July 25

Instructions

In providing a response for each question, please ensure that the 'status' column is completed using the following options:

- YES
- NO
- PARTIALLY
- N/A

To aid the SARG Lead it may be useful that each question is also highlighted accordingly to illustrate what is:

resolved **YES** not resolved **PARTIALLY** not compliant **NO**

Executive Summary
<p>A full assessment was conducted on the following documents:</p> <ul style="list-style-type: none"> • ACP V2.0 • Annex A Engagement Evidence – CONFIDENTIAL • Annex B HRA Screening Criteria V2.0 • Annex C Surveillance Coverage Evidence V2.0 • Annex D Final Mature Draft LoA – CONFIDENTIAL • Annex E TOI & APSA V2.0 • DECONFLICTION PLAN TDA V3

The NPAS BVLOS trial proposes the establishment of a Temporary Danger Area (TDA) over the Severn Estuary, northwest of Bristol, to facilitate 90 days of nighttime UAS operations between **03rd July 2025 and 01st October 2025**.

The UAS, a Schiebel Camcopter S-100, will operate from Avonmouth Helipad at altitudes between 900 and 1,050 ft AMSL, with flights occurring Monday to Friday between 22:00 and 04:00 local time.

The TDA is sectorised into three areas:

- Sector 1 (Central) always active for any sortie
- Sector 2 (West) activated as needed
- Sector 3 (North) activated as needed

The trial is structured in two stages:

- Stage 1 focuses on system checks and short-duration sorties
- Stage 2 involves extended BVLOS operations to assess onboard radar performance and the feasibility of UAS as a supplement to crewed police aviation.

Cardiff ATC will provide air traffic services and manage TDA access via a Special Use Airspace Crossing Service (SUACS). The trial aims to inform future BVLOS integration policy and assess operational viability for emergency services.

The sponsor has not met the full requirements of the CAP1616g process. The proposal, in its current form, is **not acceptable** for regulatory approval.

However, if the sponsor:

- Correctly implements the SUACS in accordance with SARG Policy 133 Annex F1.4.
- Removes all references to tactical deconfliction and FIS during UAS operations.
- Aligns all supporting documentation (ACP, TOI, LoA, Deconfliction Plan).

Then, based on the principles of proportionality and safety, the ACP may be considered acceptable for approval as a temporary trial.

****UPDATE 16th June 2025****

Sponsor has provided sufficient updates in the ACP V4.0

1.	Justification for change and options analysis (operational/technical)	Status
1.1	Is the explanation of the proposed change clear and understood?	PARTIALLY
	<p>The sponsor has provided a general description of the proposed airspace change, including the structure, duration, and operational context.</p> <p>However, the submission lacks clearly defined objectives or measurable success criteria, as required under CAP1616g. The high-level trial plan does not provide sufficient detail to assess whether the proposed airspace structure is proportionate to the intended outcomes.</p> <p>[RECOMMENDATION] The sponsor should revise the trial plan to include a clear set of defined, measurable objectives aligned with the stated aims of the proposal. These objectives should be structured in a way that allows for meaningful evaluation of trial outcomes.</p>	
1.2	Are the reasons for the change stated and acceptable?	PARTIALLY
	<p>The sponsor has stated the reasons for the proposed change, which include assessing the operational viability of UAS for police air support, evaluating onboard radar as a detect-and-avoid capability, and contributing to the development of BVLOS integration policy.</p> <p>These reasons are broadly aligned with CAP2533, CAP2540, and the Airspace Modernisation Strategy (CAP1711). However, the absence of clearly defined, measurable objectives and a structured evaluation criteria limits the ability to fully assess the operational justification for the proposed airspace structure.</p> <p>The sponsor should note that under the sandbox trial, CAP2533, is not intended to benefit a single sponsor or airspace user. Its purpose is to define a national policy concept for the safe and scalable integration of BVLOS operations into UK airspace. So, it is a strategic enabler for the entire aviation ecosystem, not a mechanism to serve the interests of a single sponsor or trial. Trials conducted under its framework are expected to generate insights that benefit all airspace users, not just the sponsor.</p>	
1.3	Have all appropriate alternative options been considered, including the 'do nothing' option?	NO
	<p>The sponsor has not provided a structured or comprehensive analysis of alternative options, as required under CAP1616g, section 4.5. While some alternatives are mentioned (e.g. a closed environment or a TRA from Almondsbury), these are not evaluated in detail or compared against the proposed TDA. The 'do nothing' option is not considered at all.</p> <p>I do not accept that the sponsor has followed CAP1616g process, but I agree that this is the only viable option currently based on previous correspondence. The chosen approach is proportionate and justified.</p>	

1.4	Is the justification for the selection of the proposed option sound and acceptable?	YES
	<p>The sponsor has selected a Temporary Danger Area (TDA) to support BVLOS UAS operations. While this aligns with the need to segregate, the justification does not meet the requirements of CAP1616g, section 6.17 or SARG Policy 133, section 5.6. The sponsor has not provided a structured comparison with alternative SUA constructs, nor have they demonstrated that the selected airspace volume is the minimum necessary to meet the trial objectives. Furthermore, the trial lacks clearly defined, measurable objectives, which limits the ability to assess whether the selected airspace structure is proportionate or appropriate.</p> <p>[RECOMMENDATION] The sponsor should revise the justification for the selection of the Temporary Danger Area (TDA) to ensure compliance with the requirements of CAP1616g, section 6.17 or SARG Policy 133, section 5.6.</p> <p>**UPDATE 16th June 2025**</p> <p>Sponsor has provided an Updated ACP V4.0 which has provided sufficient rationale for the proposed airspace structure.</p>	

2.	Airspace description and operational arrangements	Status
2.1	Is the type of proposed airspace design clearly stated and understood?	PARTIALLY
	<p>The sponsor has clearly stated and described the proposed Temporary Danger Area (TDA), including its segmentation, activation procedures, and operational context.</p> <p>However, the sponsor has not provided any technical airspace design principals justification for the airspace dimensions. The operational volume shown in Figure 5 is significantly smaller than the full TDA boundary shown in Figure 4, and no evidence has been provided to demonstrate that the UAS requires the full extent of the requested airspace. This is inconsistent with the requirements of SARG Policy 133 section 5.6, which essentially states that SUA must be “as small as practicable” and based on the requirements of the activity.</p>	

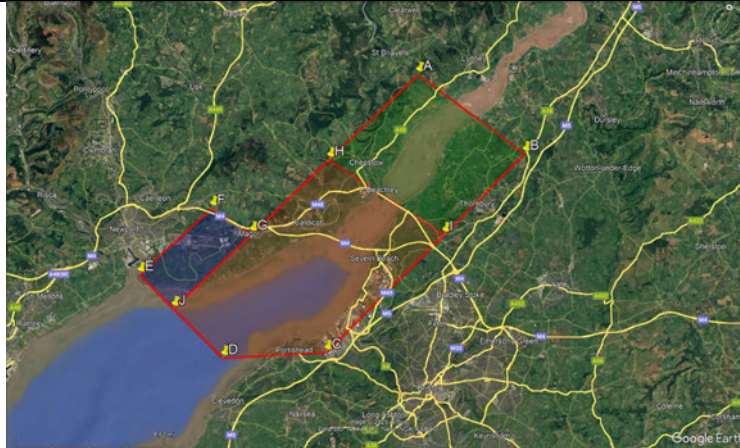


Figure 4: The TDA outlined in red with 3 sectors. The Central Sector (1) shaded red, West Sector (2) shaded blue, and North Sector (3) shaded green. Displayed on a Google Earth background.

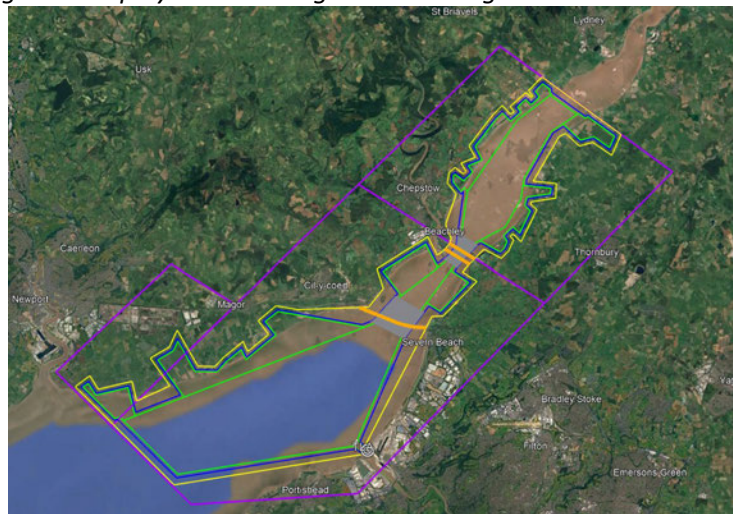


Figure 5: TDA sector outlines (purple) with Area of Operation outline (yellow), mission areas (green labels), transit corridor (grey label), obstruction areas (grey or orange shaded), and Take-off/Landing Area on a Google Earth background.

	UPDATE 16th June 2025** Sponsor has provided an Updated ACP V4.0 which has provided sufficient rationale for the proposed airspace structure.	
2.2	Are the hours of operation of the airspace and any seasonal variations stated and acceptable?	YES
	The sponsor has clearly stated the hours of operation for the proposed Temporary Danger Area (TDA), which will be active Monday to Friday from 22:00 to 04:00 local time between 03 July and 01 October 2025. These hours are fixed, the justification for nighttime only operations is proportionate, aiming to minimise disruption to other airspace users. Stakeholder feedback confirms that the proposed hours are broadly acceptable, with no significant objections raised in relation to nighttime operations. The proposed hours meet the requirements of CAP1616g, section 4.8 and SARG Policy 133, section 5.6(c).	
2.3	Is any interaction with adjacent domestic and international airspace structures stated and acceptable including an explanation of how connectivity is to be achieved? Has the agreement of adjacent States been secured in respect of High Seas airspace changes?	PARTIALLY
	The sponsor has identified that the proposed Temporary Danger Area (TDA) lies entirely within Class G airspace and is situated directly beneath the Bristol CTA 6, 7, 8 which begins at $\geq 4,000$ ft AMSL. Additional, airspace volumes have been identified in the vicinity of the TDA to the South; CTA 1, 2, 3, 4 and Bristol CTR $\leq 2,000$ ft AMSL. But the TDA does not infringe, and the sponsor has a TOI and LOA with Cardiff ATC to provide a SUACS to manage interactions with other airspace users. While the sponsor asserts that the TDA does not interact with adjacent airspace structures, this is only valid if the hazardous activity is fully contained within the TDA, this is a requirement of Danger Area design under SARG Policy 133 Annex F. However, the sponsor has not provided any technical airspace design principles, containment modelling, or buffer analysis to demonstrate that the UAS will remain within the TDA under all operational conditions. The absence of this information limits the ability to assess whether the TDA design is sufficient to ensure vertical containment and avoid unintended interaction with the overlying Bristol CTA. [RECOMMENDATION] While the CAA UAS Sector Team may assess containment as part of the Operational Authorisation process, the ACP should still include a summary of the airspace design rationale to support regulatory transparency and completeness.	
2.4	Is the supporting statistical evidence relevant and acceptable?	YES
	The sponsor has provided relevant and clearly presented statistical evidence to support the proposed Temporary Danger Area (TDA). The data includes monthly aircraft counts, altitude distributions, and trajectory plots based on ADS-B data from Plane Finder.	

	The analysis is appropriately filtered to reflect the proposed operational window (22:00–03:59, Mon–Fri) and covers the same three-month period in the previous year. The sponsor acknowledges the limitations of ADS-B data in Class G airspace and justifies its use. The evidence is proportionate and meets the requirements of CAP1616g, section 4.9.	
2.5	Is the analysis of the impact of the traffic mix on complexity and workload of operations complete and satisfactory?	YES
	The sponsor has provided a complete and satisfactory analysis of the impact of the proposed Temporary Danger Area (TDA) on the complexity and workload of air traffic operations. The analysis is supported by a detailed ATC Procedures Safety Assessment (APSA), a mature Letter of Agreement (LoA), and a Temporary Operating Instruction (TOI) agreed with Cardiff ATC.	
2.6	Are any draft Letters of Agreement and/or Memoranda of Understanding included and, if so, do they contain the commitments to resolve ATS procedures (ATSD) and airspace management requirements?	YES
	<p>The sponsor has provided a draft Letter of Agreement (LoA), Temporary Operating Instruction (TOI), and ATC Procedures Safety Assessment (APSA). These documents clearly define the coordination responsibilities between Cardiff ATC, NPAS, and the UAS operator, including pre-flight planning, real-time communications, emergency procedures, and tactical airspace access.</p> <p>The LoA refers to a Temporary Reserved Area (TRA) rather than the Temporary Danger Area (TDA) that is the subject of this ACP. Additionally, there are inconsistencies in terminology between the ACP and the LoA and TOI. Most notably, the ACP and TOIs both describe providing a FIS to manned aviation (ie emergency traffic) while the UA is still airborne in the same volume of airspace. This is not the intended use a SUA crossing service as it can <u>only</u> be provided when the confirmation of the hazard is not present as per SARG Policy 133, Annex F1.4.</p> <p>The provided deconfliction plan outlines both strategic and tactical deconfliction procedures for the proposed TDA. While the plan includes detailed coordination with Cardiff ATC and blue light services, it introduces a significant inconsistency with the SUA crossing service described in the TOI and LoA.</p> <p>Specifically, the sponsor proposes that Cardiff ATC will provide UK FIS (likely Basic Service) and tactical traffic information to enable deconfliction with manned aircraft while the UA is airborne in the proposed airspace structure. This contradicts the SUA crossing service principle that transit is only permitted when the hazard (the UAS) is not present in the SUA. Furthermore, the sponsor has defined separation standards (e.g. 300 m lateral, 200 ft vertical participating traffic or at least 500m lateral separation unknow traffic) without conducting any regulatory assessment of ICAO separation minima, aircraft performance, or collision risk modelling. The proposed separation standards are not validated against any recognised regulatory framework (ie ICAO Doc 4444, CAP 439 etc).</p> <p>This introduces ambiguity regarding the level of service being provided and raises concerns about the safety assurance of tactical</p>	

	<p>deconfliction procedures. The sponsor <u>must</u> revise the deconfliction plan to ensure the correct management requirements of a SUA crossing service and remove references to tactical deconfliction, separation or FIS.</p> <p>The sponsor has also failed to reference the deconfliction plan within the submitted ACP.</p> <p>**UPDATE 16th June 2025**</p> <p>Sponsor has provided an Updated ACP V4.0 which has provided sufficient rationale for the proposed airspace structure. Deconfliction plan still needs to be updated to reflect the TOI/LOA correctly.</p> <p>[CONDITION] — Revise the deconfliction plan to reflect the requirements of a SUA crossing service as per the intention found within SARG Policy 133 Annex F1.4.</p> <p>Remove any reference to separation, deconfliction or FIS as these are not possible within a TDA.</p> <p>Align all documentation (ACP, TOI, LoA, deconfliction plan) terminology and procedures.</p> <p>Clarify the role of Cardiff ATC more consistently across all submitted documentation.</p> <p>This must be produced, resubmitted and assessed prior to any commencement of operations.</p> <p>[RECOMMENDATION] The sponsor is advised to review and update the ACP and supporting documentation to ensure consistency in terminology and scope across all materials.</p>	
2.7	Should there be any other aviation activity (low flying, gliding, parachuting, microlight site etc) in the vicinity of the new airspace structure and no suitable operating agreements or ATC Procedures can be devised, what action has the change sponsor carried out to resolve any conflicting interests?	YES
	<p>The sponsor has demonstrated that they have actively engaged with a wide range of aviation stakeholders, including gliding clubs, microlight operators, model flying clubs, and emergency services. Where no formal operating agreements or ATC procedures could be devised, the sponsor has taken proportionate steps to resolve or mitigate conflicting interests.</p> <p>Multiple stakeholders raised concerns about access during daytime operations (e.g. gliding, microlight, model flying).</p> <p>This includes amending the airspace design, proposing geofencing solutions, and clarifying operational procedures for emergency and non-transponder-equipped aircraft. These actions are consistent with the requirements of CAP1616g section, 4.12.</p>	

2.8	Is the evidence that the airspace design is compliant with ICAO SARPs, airspace design & FUA regulations, and Eurocontrol guidance satisfactory?	YES
	<p>The sponsor has provided evidence however, the airspace design has not met the requirements of SARG Policy 133, Annex F. Airspace design must also factor in the operational management of the airspace. The sponsor has clearly demonstrated that the interpretation of a SUA crossing service is incorrect as per question 2.6.</p> <p>**UPDATE 16th June 2025**</p> <p>Sponsor has provided an Updated ACP V4.0 which has provided sufficient evidence to confirm the structure is compliant.</p>	
2.9	Is the proposed airspace classification stated and justification for that classification acceptable?	YES
	<p>The sponsor has clearly stated that the proposed Temporary Danger Area (TDA) will be established within Class G airspace, with vertical limits from the surface to 1,400 ft AMSL. This classification is appropriate for the nature of the activity and meets the requirements of CAP1616g.</p>	
2.10	Within the constraints of safety and efficiency, does the airspace classification permit access to as many classes of user as practicable?	YES
	<p>As outlined in the findings for Question 2.6, the sponsor has conflated the provision of a UK Flight Information Service (FIS) with the concept of a SUA crossing service and has proposed that tactical deconfliction and traffic information can be provided while the RPAS is airborne. This is inconsistent with the requirements of SARG Policy 133 Annex F.</p> <p>**UPDATE 16th June 2025**</p> <p>Sponsor has provided an Updated ACP V4.0 which has provided sufficient evidence to confirm the structure is compliant.</p>	
2.11	Is there assurance, as far as practicable, against unauthorised incursions? (This is usually done through the classification and promulgation.)	PARTIALLY
	<p>The sponsor has provided a clear and proportionate set of measures to mitigate the risk of unauthorised incursions by the establishment of a temporary DA, geofencing of the UA, NOTAM activation, and Cardiff ATC providing a SUACS.</p> <p>However, the proposed implementation of a SUA Crossing Service (SUACS) while the UA is airborne is inconsistent with SARG Policy 133 Annex F1.4, which states that SUACS may only be provided when the hazard is not present. This may be a partial but see Q2.6.</p>	

2.12	Is there a commitment to allow access to all airspace users seeking a transit through controlled airspace as per the classification, or in the event of such a request being denied, a service around the affected area?	YES
	Not applicable as the proposed TDA is located entirely within Class G.	
2.13	Are appropriate arrangements for transiting aircraft in place in accordance with stated commitments?	YES
	<p>The sponsor has committed to allowing access to the Temporary Danger Area (TDA) via a Special Use Airspace Crossing Service (SUACS) and has implemented a pre-flight booking system to support strategic deconfliction.</p> <p>However, the proposed implementation of a SUA Crossing Service (SUACS) while the UA is airborne is inconsistent with SARG Policy 133 Annex F1.4, which states that SUACS may only be provided when the hazard is not present. See Q2.6.</p>	
2.14	Are any airspace user group's requirements not met?	YES
	The sponsor has engaged with a wide range of airspace users and has made efforts to reduce the impact of the proposed TDA through segmentation and coordination with Cardiff ATC. This TDA is only available during night time hours (2200 hrs to 0400 hrs) when most airspace users will not be affected.	
2.15	Is any delegation of ATS justified and acceptable? (If yes, refer to Delegated ATS Procedure).	YES
	There is no requirement for the delegation of ATS as the TDA is wholly within UK airspace and situated in Class G.	
2.16	Is the airspace design of sufficient dimensions with regard to expected aircraft navigation performance and manoeuvrability to contain horizontal and vertical flight activity (including holding patterns) and associated protected areas in both radar and non-radar environments?	PARTIALLY
	As per Q2.3 no UA performance criteria has been evidenced within the ACP.	
2.17	Have all safety buffer requirements (or mitigation of these) been identified and described satisfactorily (to be in accordance with the agreed parameters or show acceptable mitigation)? (Refer to buffer policy letter.)	PARITALLY

	As per Q2.3 no technical airspace design principles have been described or evidenced within the final ACP submission. This is typically the requirement of the RPAS sector team to ascertain, however, it is recommended that the sponsor should still provide supported rationale within the ACP.	
2.18	Do ATC procedures ensure the maintenance of prescribed separation between traffic inside a new airspace structure and traffic within existing adjacent or other new airspace structures?	YES
	Not applicable, ATC is unable to provide separation between UA & Manned airspace users.	
2.19	Is the airspace structure designed to ensure that adequate and appropriate terrain clearance can be readily applied within and adjacent to the proposed airspace?	PARTIALLY
	The sponsor has not provided any terrain clearance analysis or evidence within the ACP. However, based on Figure 5 in Q2.1 the intended operational volume the UA operates limited over land and the sponsor highlighted two bridges where the UA will transit over the estuary between 900 – 1050 ft.	
2.20	If the new structure lies close to another airspace structure or overlaps an associated airspace structure, have appropriate operating arrangements been agreed?	YES
	Not applicable see Q2.1	
2.21	Where terminal and en-route structures adjoin, is the effective integration of departure and arrival routes achieved?	YES
	Not applicable	

3.	Supporting resources and communications, navigation and surveillance(CNS) infrastructure	Status
3.1	Is the evidence of supporting CNS infrastructure together with availability and contingency procedures complete and acceptable? The following are to be satisfied:	

	<ul style="list-style-type: none"> • Communication: Is the evidence of communications infrastructure including RT coverage together with availability and contingency procedures complete and acceptable? Has this frequency been agreed with AAA Infrastructure? 	YES
	The sponsor in section 8.1 of the ACP has provided a statement specifying that radio communications will be used in conjunction with a mobile phone as a backup. With evidence provided in submitted Annex C to show whether or not RT coverage is sufficient.	
	<ul style="list-style-type: none"> • Navigation: Is there sufficient accurate navigational guidance based on in-line VOR or NDB or by approved RNAV-derived sources, to contain the aircraft within the route to the published RNP value in accordance with ICAO/ Eurocontrol standards? For example, for nav aids, has coverage assessment been made, such as a DEMETER report, and if so, is it satisfactory? 	YES
	Not applicable – the RPAS Sector Team will assess the GNSS positional capability of the UA and ensure that the tDA design is sufficient to contain the hazardous activity.	
	[RECOMMENDATION] As per Q2.3	
	<ul style="list-style-type: none"> • Surveillance: Radar provision – have radar diagrams been provided, and do they show that the ATS route/airspace structure can be supported? 	YES
	Cardiff ATC will provide a RADAR service provision with evidence supplied within Annex C.	
3.2	Where appropriate, are there any indications of the resources to be applied, or a commitment to provide them, in line with current forecast traffic growth acceptable?	YES
	The sponsor has provided clear and proportionate evidence of the resources to be applied during the 90-day Temporary Danger Area (TDA) trial. The Letter of Agreement (LoA), Temporary Operating Instruction (TOI), and ATC Procedures Safety Assessment (APSA) collectively demonstrate that Cardiff ATC and NPAS have agreed on the operational commitments required to support the trial.	

4.	Maps/charts/diagrams	Status
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4.1	Is a diagram of the proposed airspace included in the proposal, clearly showing the dimensions and WGS84 co-ordinates? (We would expect sponsors to include clear maps and diagrams of the proposed airspace structure(s) – they do not have to accord with aeronautical cartographical standards (see airspace change guidance), rather they should be clear and unambiguous and reflect precisely the narrative descriptions of the proposals.)	YES
	Yes, the sponsor has provided the map and a draft AIC which clearly show the dimensions and WGS84 co-ordinates.	
4.2	Do the charts clearly indicate the proposed airspace change?	YES
	Yes, the charts clearly indicate the proposed change.	
4.3	Has the change sponsor identified AIP pages affected by the change proposal and provided a draft amendment?	YES
	Yes, the sponsor has provided the final proposal in the form of a draft AIC which will be CAA reviewed prior to submission. The AIC defines the SUACS frequencies.	
4.4	Has the change sponsor completed the WGS84 spreadsheet and submitted to the CAA for approval?	YES
	There is no requirement for the trial sponsor to meet ADQ compliance for an AIC.	

5.	Operational impact	Status
5.1	Is the change sponsor's analysis of the impact of the change on all airspace users, airfields and traffic levels, and evidence of mitigation of the effects of the change on any of these, complete and satisfactory? Consideration should be given to:	

	a) Impact on IFR General Aviation traffic, on Operational air traffic or on VFR General Aviation traffic flow in or through the area.	YES
	<p>The sponsor has provided a complete and proportionate assessment of the operational impact of the proposed TDA. Stakeholder engagement was thorough, and no objections were raised. The mitigations are appropriate, and the offshore location ensures minimal disruption to IFR and VFR GA traffic and operational air traffic.</p> <p>This was quantified through the airspace analyser tool to showing between 2200 hrs to 0400 hrs from 01st July 2024 to 31st December 2024 <=1,400 ft no cooperative traffic was identified.</p>	
	b) Impact on VFR Routes.	YES
	No formal VFR routes are affected by the proposed TDA. Informal VFR activity along the estuary has been considered and mitigated through stakeholder engagement. Additionally, based on the activation times of the TDA the impact is assessed as being negligible.	
	c) Consequential effects on procedures and capacity, i.e. on SIDs, STARs, holds. Details of existing or planned routes and holds.	YES
	There are no consequential effects on SIDs, STARs, or holding procedures. The TDA is located in Class G airspace, well below the levels used for instrument procedures, and has been reviewed by Cardiff ATC with no objections raised.	
	d) Impact on airfields and other specific activities within or adjacent to the proposed airspace.	YES
	The sponsor has demonstrated that the proposed TDA will not adversely impact any airfields or specific activities. All relevant stakeholders were consulted, and no objections were raised. The mitigations are appropriate and proportionate to the nature of the operation.	
	e) Any flight planning restrictions and/ or route requirements.	YES
	There are no flight planning restrictions or route requirements imposed by the proposed TDA. The sponsor has demonstrated that the operation will not interfere with existing airspace structures or planned routes, and that procedural mitigations are in place to support access when needed.	
5.2	Does the change sponsor consultation material reflect the likely operational impact of the change?	YES

	The consultation material accurately reflects the likely operational impact of the proposed airspace change. It was clear, proportionate, and responsive to stakeholder concerns.
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Case study conclusions – to be completed by Airspace Regulator (Technical)	Yes/No
Has the change sponsor met the SARG airspace change proposal requirements and airspace regulatory requirements above?	YES
<p>The sponsor has not met the full requirements of the SARG airspace change proposal process or the requirements set out in CAP1616g. While the proposal includes several positive features, there are significant deficiencies in clarity, proportionality, justification and compliance.</p> <p>The sponsor has not:</p> <ul style="list-style-type: none"> • Provided a structured options analysis or justification for the selected SUA construct. • Demonstrated that the airspace is the minimum necessary to contain the activity. • Correctly implemented or described the SUA Crossing Service (SUACS) in accordance with SARG Policy 133 Annex F. • Provided technical evidence of containment, safety buffers, or terrain clearance. • Aligned terminology and procedures across all supporting documentation. <p>These issues must be addressed before the proposal can be considered compliant with the CAP1616g process and SARG regulatory requirements.</p> <p>**UPDATE 16th June 2025**</p> <p>Sponsor has provided an Updated ACP V4.0 with associated supporting documents which has provided sufficient evidence to satisfy the requirements of CAP1616g.</p>	

RECOMMENDATIONS/CONDITIONS/PIR DATA REQUIREMENTS	Yes/No
Are there any Recommendations which the change sponsor <u>should try</u> to address either before or after implementation (if approved)? If yes, please list them below.	

GUIDANCE NOTE: Recommendations are something that the change sponsor ***should try*** to address either before or after implementation, if indeed the airspace change proposal is approved. They may relate to an area in which the change sponsor is reliant upon a third party to actually come to an agreement and consequently they do not carry the same 'weight' as a Condition.

- The sponsor should revise the trial plan to include a clear set of defined, measurable objectives aligned with the stated aims of the proposal. These objectives should be structured in a way that allows for meaningful evaluation of trial outcomes.
- The sponsor should revise the justification for the selection of the Temporary Danger Area (TDA) to ensure compliance with the requirements of CAP1616g, section 6.17 or SARG Policy 133, section 5.6.
- While the CAA UAS Sector Team may assess containment as part of the Operational Authorisation process, the ACP should still include a summary of the airspace design rationale to support regulatory transparency and completeness.

Are there any Condition(s) which the change sponsor **must fulfil** either before or after implementation (if approved)?
If yes, please list them below.

Signed ("wet signature") copies of all Letters of Agreement (LoA) must be submitted to the CAA **before COB on 1 Jul 25**. The sponsor must not commence operations until confirmation of acceptance of the signed LoAs has been received from the CAA.

Relevant stakeholders should be made fully aware of the contents of any related Temporary Operating Instructions and Letters of Agreement.

Should the sponsor satisfy themselves that they have completed all the necessary flights before the end of the TDA publication period, they are to withdraw the AIC for the TDA immediately via Aurora (or, if the sponsor is unable to complete this process themselves, the CAA is to be notified that the AIC can be withdrawn).

General summary

With the updates provided from the sponsor the safety argument has been met and the impact is low.

Comments and observations

Operational assessment sign-off	Name	Signature	Date
Operational assessment completed by Airspace Regulator (Technical)	[REDACTED]	[REDACTED]	25 Jun 25
Operational assessment approved by Principal Airspace Regulator	[REDACTED]	[REDACTED]	25 Jun 25
Principal Airspace Regulator Comments:			