

# CAA Decision Log

|  |              |
|--|--------------|
| Temporary Airspace Change Proposal Title     | NPAS BVLOS   |
| Temporary Airspace Change Proposal Reference | ACP-2024-035 |
| Change Sponsor                               | NPAS         |
| AIS Submission Target Date                   | 16 May 25    |
| CAA Decision Target Date                     | 25 Apr 25    |

## Instructions

In providing a response to each question and/or status, the following colour coding should be used:

- COMPLIANT/NOT APPLICABLE
- NOT COMPLIANT/ACTION REQUIRED
- ISSUE/CONCERN TO HIGHLIGHT

## Executive Summary

*Complete this section last. Insert narrative to provide the decision maker with a brief summary of the nature of this temporary airspace change proposal – this should cover the following:*

- *Issue/opportunity to be addressed - This ACP seeks to enable, through a trail, integrated crewed and uncrewed operations in a TRA.*  
**Update:** Due to further work needed by the sponsor, this ACP was revised to enable a TDA for the first 90 days of the trail, with a second ACP to follow for the TRA portion of the trial. Further engagement was conducted, and a revised submission received.
- *Desired outcome – To determine the effectiveness of RPAS used in NPAS operations in conjunction with conventional crewed air systems during day and night time operations. In conducting the trail, the sponsor aims to provide viable data to be used by the CAA for the development of RPAS Integration policy.*
- *Challenges/Risks – Lack of deconfliction plan. Partially met assessment criteria to be met prior to implementation, with only 2 weeks to complete. ATS drafts are reviewed but final drafts are still subject to review and acceptance.*

**Update:** Deconfliction plan no longer applicable to TDA operations, however risk remains around time constraints to complete further

work and address conditions.

- *Recommendation - Tentative passed with conditions subject to discussion with the DM.*
- *Implementation plan (notification/promulgation of change if approved) Target AIS submission 16 May 25, AIC effective 26 Jun 25.*

**Update:** *Target implementation date remains the same, subject to approval of AIC finalisation if the ACP is approved.*

| PART A – Airspace Change Process |   |
|----------------------------------|---|
| <b>A.1</b>                       | <b>Airspace Change Portal</b>   |
| A.1.1                            | <a href="#"><u>Airspace change proposal public view</u></a>   |
| <b>A.2</b>                       | <b>CAA SharePoint site</b>  |
| A.2.1                            | <a href="#"><u>NPAS BVLOS Trial - Project</u></a>   |
| <b>A.3</b>                       | <b>Chronology</b>   |
| A.3.1                            | <p><i>An assessment meeting was held on 14 Aug 24 and it was determined that the Statement of Need fell within the scope of a scaled ACP, IAW CAP 1616g (Temporary and Trail ACPs). The minutes of the assessment meeting, inclusive of an agreed timeline, were finalised and returned to the sponsor on 27 Aug 24, where they were subsequently uploaded to the Airspace Change Portal by the sponsor. The sponsor submitted their HRA on 30 Aug 24, which was confirmed to be accepted on 17 Sep 24, and the sponsor was free to execute their engagement strategy. Since there was no review of the engagement material at stage 3, the sponsor was not required to submit anything further to the CAA until stage 4, due 28 Feb 25. On 27 Feb 25 the sponsor advised of a submission delay and a timeline change was requested, which was agreed on 3 Mar 25, and the submission date was delayed to 28 Mar 25. The submission was received on this date and the assessment commenced. The decision meeting was scheduled to be held on 23 Apr 25.</i></p> <p><b>Update:</b> <i>A decision meeting was held on 23 Apr 25, but the TRA was not approved, and the ACP decision remained pending. It was recommended that to enable flying on schedule, a TDA is used initially, and a second ACP is produced to address further work needed to enable TRA operations. The additional document submissions for the TDA were received on 19 and 28 May 25.</i></p> |

|            |   |    |
|------------|---|----|
|            | <p><b>Update:</b> The decision meeting was held on 29 May 25 for the TDA, but further work was required, and the decision remained PENDING. The sponsor was advised of the further work needed, which was submitted to the CAA on 13 Jun 25. A final decision meeting was held on 25 Jun 25.</p> <p><b>Update:</b> Following the final decision meeting, the ACP is “Approved with Conditions”.</p> |    |
| <b>A.4</b> | <b>Are there any additional process requirements of the Civil Aviation Authority (Air Navigation) Directions 2023 (the “Air Navigation Directions”) and/or the Air Navigation Guidance 2017 which apply to this airspace change, and have they been complied with?</b>  | NA |
| A.4.1      | N/A   |    |

| PART B – Airspace Change Process – STAGE 5 |   |                                    |                                |
|--|---|------------------------------------|--------------------------------|
| <b>B.1</b>                                 | <b>Subject Matter Expert (SME) Regulatory Assessments</b><br>NOTE: this captures RAG status only – full details contained within each of assessment (hyperlinks inserted below)   |                                    |                                |
| <b>ATM Safety</b>                          | <i>COMPLETE</i>   | <b>Environmental</b>               | <i>COMPLETE</i>                |
| <b>Economic Assessment &amp; Statement</b> | <i>NOT APPLICABLE</i>   | <b>Instrument Flight Procedure</b> | <i>NOT APPLICABLE</i>          |
| <b>Engagement / Consultation</b>           | <i>COMPLETE</i>   | <b>Operational</b>                 | <i>COMPLETE</i>                |
| <b>B.1.1</b>                               | <i>Is there any other information outside of the regulatory assessments above which should be brought to the attention of the decision maker (e.g. outstanding Letters of Agreement)?</i>   |                                    |                                |
| <b>B.2</b>                                 | <b>Other Relevant Documents (title and hyperlinks to be inserted)</b>   |                                    |                                |
|  | <a href="#"><u>CAP 2533</u></a>   | <a href="#"><u>CAP 2989</u></a>    | <a href="#"><u>CAP2616</u></a> |
|  |   |                                    |                                |
| <b>B.3</b>                                 | <b>Has the relevant legal and policy framework to the airspace change process been taken into account, including:</b> <ul style="list-style-type: none"> <li>the Air Navigation Directions;</li> <li>the Airspace Modernisation Strategy;</li> <li>section 70 of the Transport Act 2000;</li> <li>the Air Navigation Guidance 2017; and</li> <li>CAP 1616 and associated publications?</li> </ul> |                                    | <b>Y</b>                       |
| <b>B.4</b>                                 | <b>CAA consideration of whether the proposal is in accordance with the Airspace Modernisation Strategy (Air Navigation Directions, direction 5(1)).</b>   |                                    |                                |



|  |  |  |
|--|--|--|
|  | <p><b>NOTE:</b> the left column captures RAG status only and the right column captures the rationale – full details will be contained within the SME Regulatory Assessments. Reference should be made to the AMS characteristics (<a href="#">CAP 1616f</a>, 6.61). For more information on the AMS strategic objectives, see <i>Airspace Modernisation Strategy 2023-2040 Part 1: Strategic Objectives and Enablers</i> (<a href="#">CAP 1711</a>).</p>   |  |
| Safety   | Safety is maintained as the temporary Danger Area is segregated by nature and the hazardous activity can be contained within the airspace structure.   |  |
| Integration of diverse airspace users                      | The airspace structure is a temporary Danger Area segregating all other air users.   |  |
| Simplification of airspace system                          | The ACP airspace design aligns with SARG Policy 133 POLICY FOR THE ESTABLISHMENT AND OPERATION OF SPECIAL USE AIRSPACE. The design of the Temporary Danger Area is simple; however, it is not proportionate as the operating volume is smaller than the proposed airspace structure size. Impact is low to all other air users due to the operating times and the overall design of the airspace will maintain the hazardous activity.   |  |
| Environmental sustainability                               | This ACP is aligned with the AMS environmental sustainability objectives and the Government's key environmental objectives with respect to air navigation as set out in the Government's Air Navigation Guidance 2017. For airspace trials shorter than 12 months, the airspace change sponsor is only required to present an assessment of the noise impacts which must be used to identify the affected communities that must be informed. In addition, the airspace change sponsor is required to conduct a habitats regulation assessment screening to determine whether the proposed airspace change will affect any European sites within the zone of influence. On the basis of the rationale and evidence submitted by the airspace change sponsor the airspace trial is unlikely to lead to a change in the existing levels of environmental impacts and therefore, the Government's key environmental objectives can be met. |  |
| <b>B.5</b>   | <p><b>CAA consideration of factors material to our decision whether to approve the change (section 70, Transport Act 2000).</b></p> <p><b>NOTE:</b> the left column captures RAG status only and the right column captures a summary of the rationale – full details will be contained within the SME Regulatory Assessments. Reference should be made to the Section 70 characteristics (<a href="#">CAP 1616f</a>, 6.80).</p>  |  |
| Maintain a high standard of safety in the provision of air | The proposal maintains a high standard of safety by segmenting the TDA structure, these are supported by Letters of Agreement and Temporary Operating Instruction's that define clear ATS responsibilities and fallback procedures. The use of a SUACS ensures real-time coordination and  |  |

|   |  |
|---|--|
| traffic services<br>section 70(1)(a)  | situational awareness, while Mode S and ADS-B surveillance provide continuous tracking of the unmanned aircraft. Safety risks have been assessed through a structured HazID process, and the airspace design includes appropriate buffers and contingency measures to ensure safe operations.  |
| Secure the most efficient use of airspace consistent with the safe operation of aircraft and the expeditious flow of air traffic<br>section 70(2)(a)  | The proposal supports efficient use of airspace by segmenting the Temporary Danger Area (TDA) structure, allowing for flexible activation and minimising disruption to other users. Safety is maintained through the activation timings (2100 hrs 0300 hrs UTC) when traffic is vastly reduced, robust coordination procedures, including Letters of Agreement and a Temporary Operating Instruction. The sponsor has analysed traffic patterns and controller workload, ensuring the design does not adversely impact the flow of air traffic.  |
| Satisfy requirements of operators and owners of all classes of aircraft<br>section 70(2)(b)   | The vertical limitation of the TDA allows traffic to continue to transit above the airspace structure. It also allows for sufficient surveillance capabilities to be affective to all air users. This approach supports the needs of general aviation, military and commercial airspace users by minimising disruption and maintaining safe separation.  |
| Take account of the interests of any other person (other than an operator or owner of an aircraft) in relation to the use of any particular airspace or the use of airspace generally<br>section 70(2)(c) | The sponsor has considered the interests of non-aviation stakeholders by designing the TDA complex to avoid populated areas and environmentally sensitive zones. The vertical limits of the TDA were selected to minimise the impact to transiting traffic above and to allow for sufficient surveillance. Engagement with local authorities, airport operators, and environmental stakeholders has been documented, and the operational area has been optimised to reduce potential disturbance.  |
| Take into account the Secretary of State's guidance relating to spaceflight activities<br>section 70(2)(ca)   | N/A  |
| Take into account the Secretary of State's guidance on environmental objectives<br>section 70(2)(d)   | This ACP is aligned with the Secretary of State's guidance on environmental objectives detailed in the Air Navigation Guidance 2017, relating to reducing the noise, global emissions and air quality impacts from aviation. The airspace change sponsor presented their rationale and supporting evidence indicating that the proposed airspace change is unlikely to lead to adverse environmental impacts on communities or biodiversity. There are conditions the change sponsor must fulfil; these are presented in section C.2.1. Once the conditions are fulfilled, the change sponsor will have satisfied all relevant |


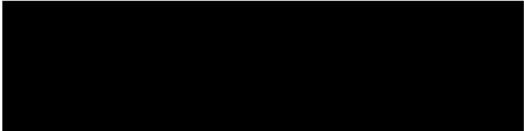
|  |   |   |
|--|---|---|
|  | policy and/or guidance regarding the environmental impacts of the proposed airspace change.   |   |
| Facilitate the integrated operation of air traffic services provided by or on behalf of the armed forces of the Crown and other air traffic services<br>section 70(2)(e) | The proposal supports integrated ATS operations by ensuring coordination between civil and military stakeholders through Letters of Agreement and the Temporary Operating Instruction. The use of a SUACS enables real-time coordination, and the segmented structure allows for flexible access and deconfliction.   |   |
| Take account of the interests of national security<br>section 70(2)(f)   | N/A   |   |
| Take account of any international obligations notified to the CAA by the Secretary of State<br>section 70(2)(g)  | No such international obligations have been notified to the CAA under section 70(2)(g) of Transport Act 2000.   |   |
| <b>B.6</b>   | <b>Are there any other associated publications relevant to the proposal and, if so, have the requirements of those publications been met?</b><br><u>NOTE:</u> associated publications include Airspace Policy Statements listed <a href="#">here</a> .  | Y |
| B.6.1  | Yes, the proposal aligns with the requirements set out in SARG Policy 133 Policy for the Establishment and Operation of Special Use Airspace and CAP740 UK Airspace Management Policy.<br><br>However, the design of the Temporary Danger Area (TDA) complex does not reflect all key principles from the policy but it is determined that the safety argument has met and the impact is low. The use of a SUACS supports the Flexible Use of Airspace (FUA) concept. |   |
| <b>B.7</b>   | <b>Conclusions in respect of requirement to ensure that the amount of controlled airspace is the minimum required to maintain a high standard of air safety and, subject to overriding national security or defence requirements, that the needs of all airspace users is reflected on an equitable basis.</b><br><u>NOTE:</u> this section only applies if the CAA is classifying or amending the classification of UK airspace.                                     |   |

|       |     |
|-------|-----|
| B.7.1 | N/A |
|-------|-----|





| PART C – Stage 5 Recommendation |  |          |
|---------------------------------|--|----------|
| <b>C.1</b>                      | <b>Taking the above information into account, what is your recommendation to the decision-maker for this proposal?</b>   |          |
| C.1.1                           | <i>Approved with conditions.</i>   |          |
| <b>C.2</b>                      | <b>Are there any Recommendations and/or Conditions for the change sponsor to address prior to implementation (if approved)?</b>  | <b>Y</b> |
| C.2.1                           | <p><b>Conditions that MUST be met prior to commencing operations:</b></p> <p>Signed (“<i>wet signature</i>”) copies of all LoAs must be submitted to the CAA by COB on 1 Jul 25. The sponsor should not commence operations until confirmation of acceptance of the signed LoAs has been received by the sponsor from the CAA.</p> <p>The change sponsor should inform the stakeholders of the decision (when published), likely impacts and what will happen next.</p> <p><b>Conditions that MUST be met during the trial:</b></p> <p>If during the trial, and while planning the routes, the airspace change sponsor becomes aware that they will overfly noise sensitive receptors below 1000ft they must inform them about the expected noise levels.</p> <p>During the trial, the airspace change sponsor should ensure that the RPAS operates at altitudes similar or higher than those typically used by NPAS crewed aircraft when flying over the protected sites.</p> <p>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 TRA. 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.</p> <p><b>Conditions that MUST be met post trial:</b></p> <p>Following the conclusion of the trial, the airspace change sponsor must provide a short report to the CAA capturing interactions or</p> |          |

|  |  |   |   |          |
|--|--|---|---|----------|
|  | <p>difficulties encountered with birds (if any) - (this should include nil returns).</p> <p><b>Recommendations (not mandatory for implementation but for consideration):</b></p> <p>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> <p>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>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.</p> |   |   |          |
| <b>C.3</b>                                     | <b>Are any other consents and approvals needed in order to permit the intended operation (title and hyperlinks to be inserted)?</b>  |   |   |          |
| <i>Operational Authorisation – RPAS Sector</i> |  |   |   |          |
|  |  |   |   |          |
| <b>C.4</b>                                     | <b>Are there any other comments/observations for the decision maker?</b>   |   |   | <b>N</b> |
| <b>C.4.1</b>                                   | <p><i>Use this section to provide a short summary (by numbers and themes) of any correspondence that we have received directly in relation to the airspace change proposal. Relevant data can be obtained from the Airspace Specialist (Correspondence). Insert additional narrative as required.</i></p>  |   |   |          |
| <b>C.5</b>                                     | <b>Regulator's Signature</b>   |   |   |          |
| Technical Regulator                            |  |  |  | 25/6/25  |

| PART D – Final Regulatory Decision – Comment/Approval<br>[Delete signatory rows below dependent on Decision Maker] |  |  |         |
|--|--|--|---------|
| Airspace Regulation Principal comments and recommendation: APPROVED with CONDITIONS                                |  |  |         |
| Airspace Regulation Principal  |  |  | 25/6/25 |