



CAA Decision Log

Temporary Airspace Change Proposal Title	Biggin Hill 03 RNAV Trial (Extension)
Temporary Airspace Change Proposal Reference	ACP-2023-075
Change Sponsor	Biggin Hill Airport
AIS Submission Target Date	Friday 4 th September 2026
CAA Decision Target Date	Wednesday 2 nd September 2026
<i>Instructions</i> 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	
The recommendation is to approve with conditions. An operational trial of the LBHA RNP approach for Runway 03 was approved by the CAA on 16th May 2024. The approval required a phased approach to implementation to build confidence in the flyability of the procedure and to ensure a high standard of safety was maintained. Phase A involved ground testing (April and June 2025) with a proving flight in September 2025. Phase B commenced on 13th November 2025 and ended on 29th April 2026. This phase was restricted to a limited number of operators who had been specifically briefed by Biggin Hill airport prior to flying the trial approach procedure. Eight aircraft of a variety of types flew the procedure during Phase B, with accurate IFP adherence. An FMS software issue was identified for some operators during Phase B which was subsequently resolved - and enabled the CAA to grant permission to commence Phase C on 30th April 2026. Phase C is the open stage of the trial whereby any operator can request to fly the trial procedure in accordance with the details published in AIP SUP 036/2026. Data supplied by Biggin Hill covers the trial period until 31st July 2026, with 184 flights having flown the procedure with no safety issues reported and a generally very high IFP conformance accuracy. Biggin Hill airport has now indicated they wish to make the trial procedure permanent and have submitted a Statement of Need (ACP-2026-	

015) on 27th May 2026. On 17th June 2026 the CAA received a request to extend the operational trial pending the outcome of the permanent ACP in accordance with the Air Navigation Directions 2023, paragraph 8 (5). The sponsor has requested that the CAA consider a trial extension to maintain safety whilst the CAA makes a decision on the permanent change because operational adaptations have been made for all operators and ATC units affected (Biggin Hill and Swanwick ACC Terminal Control). CAP1616G (V5.1) paragraph 8.21 states that normally, the airspace should revert to its original state until the full process for a change is completed – although it is not always practical or prudent to disestablish a trial procedure and the CAA may consider extending the airspace trial whilst the permanent airspace change process is being progressed. In accordance with paragraph 8.21, the CAA has considered whether it is more practical and prudent to permit a trial extension in accordance with Phase C conditions whilst the permanent ACP is progressed.

The following factors have been taken into account, and the recommendation to the decision maker is to **approve the trial extension with conditions detailed in C.1.1** pending the outcome of the permanent airspace change (ACP-2026-015).

The arguments made by the sponsor highlight the operational safety impact of not extending the trial pending the outcome of the permanent ACP. These include the potential for creating confusion amongst operators by withdrawing the trial procedures prior to re-instating them should the permanent ACP be approved. The sponsor also cites airspace users and adjacent ANSPs that have built awareness of the trial procedure and its operating environment. The RNP 03 instrument approach also maintains a higher standard of safety than the extant visual circling approach for Runway 03. Human factors risks are highlighted too based around ATCO currency and training/competency maintenance at both LBHA and Swanwick ACC.

In addition to the arguments made by the sponsor, the feedback to date on the trial has seen no CAS incursions and the IFP flown to high levels of accuracy. There have been some track deviations observed but the reasons for these have been justifiable, albeit with feedback awaited from 10 flights in July (out of a total of 134 during the month). The FMS issue for certain operating types identified within Phase B has been rectified by the FMS coding houses, and no adverse feedback has been received from either local communities or operators. As of 3 August, 34 noise complaints had been received from stakeholders, which have been reviewed. None of the complaints suggested impacts from the trial that were different from those anticipated. While some stakeholders expressed concerns about the noise impact, they will be able to provide their feedback as part of the consultation for the permanent ACP.

It is recommended that trial extension is approved with the conditions detailed in C.1.1, which broadly align with the those applied to Phase C as detailed in the CAA Statement on 19th March 2026.

It is additionally recommended that the sponsor is required to update all relevant stakeholders prior to the commencement of the trial extension, and to remind them how they should feedback any comments.

The Phase C CAA Statement required a full report in accordance with CAP670 GEN.03 by 16th December 2026. It is recommended that this condition is adjusted to a date to be confirmed by the CAA prior to any decision on ACP-2026-015. Oversight of the trial through monthly sponsor reporting is recommended to ensure a high standard of safety is maintained and that the trial continues to meet its objectives.

The current Phase C AIP SUP expires at the end of 14th October 2026. The trial extension will therefore be implemented on 15th October 2026 until 13th October 2027.

The desired outcome is the trial continues to operate safely and operational feedback reflects that. There must be robust procedures for the suspension of the trial should a safety event occur.

It is recommended that this decision is reviewed prior to any future trial extension against the evidence gathered from the operational trial. This is to ensure regulatory requirements continue to be met should the permanent ACP decision not be made in the timescale of the recommended extended period.

PART A – Airspace Change Process	
A.1	Airspace Change Portal
A.1.1	Airspace change proposal public view
A.2	CAA SharePoint site
A.2.1	03 RNAV Trial - Project - All Documents
A.3	Chronology
A.3.1	CAA rejected ACP-2013-08 in December 2022 (decision in CAP2500) Sponsor resubmitted ACP-2023-075 on 17th October for a trial procedure responding to CAA reasons for rejecting ACP-2013-08 CAA decision date 16th May 2024 – approved the trial with a phase implementation as follows: - Phase A - flight validation to ensure flyable and procedure correctly coded – occurred on 14th/15th April 2025 and 26th June 2025 (ground) and 19th September 2025 (flight) - Phase B – pre-planned testing phase under controlled conditions (with limited fully briefed operators participating) – from 13th November 2025 until 29th April 2026 - Phase C – open testing of the procedure with reduced control conditions, commenced 30th April 2026 until 14th October 2026 Statement of Need for permanent ACP received 27th May 2026 (ACP-2026-015) Request to extend trial received 17th June 2026

A.4	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?	Y
A.4.1	Paragraph 8 (4) of the ‘Air Navigation Directions’ 2023 states that ‘an airspace trial approved by the CAA under this direction is to last for such fixed period as the CAA considers appropriate, which is not usually to be for more than six months’. Paragraph 8 (5) states that ‘the CAA may extend the period approved for an airspace trial, provided that it is satisfied that such an extension is not sought as a means to avoid making a proposal for a permanent change to airspace design’. Each phase of the trial so far has been for not more than six months but the request from the sponsor received on 17th June 2026 seeks to extend the trial until the CAA decision on the permanent ACP has been made. It is recommended to the decision maker that the receipt of the Statement of Need for the permanent ACP on 27th May 2026 (ACP-2026-015) provides sufficient intent from the sponsor to indicate that the Air Navigation Directions 2023, paragraph 8 (5) requirements are met. Furthermore, CAP1616G (V5.1) paragraph 8.21 states that normally, the airspace should revert to its original state until the full process for a change is completed – although it is not always practical or prudent to disestablish a trial procedure and the CAA may consider extending the airspace trial whilst the permanent airspace change process is being progressed. The Air Navigation Directions 2023 paragraph 8 (4) requirements are acknowledged and it is recommended that these continue to be met given the Transport Act 2000 section 70 (1) requirements for the CAA to ‘exercise its air navigation functions so as to maintain a high standard of safety in the provision of air traffic services’. The arguments made by the sponsor highlight the operational safety impact of not extending the trial pending the outcome of the permanent ACP. These include the potential for creating confusion amongst operators by withdrawing the trial procedures prior to re-instating them should the permanent ACP be approved. The sponsor also cites airspace users and adjacent ANSPs that have built awareness of the trial procedure and its operating environment. The RNP 03 instrument approach also maintains a higher standard of safety than the extant visual circling approach for Runway 03. Human factors risks are highlighted too based around ATCO currency and training/competency maintenance at both LBHA and Swanwick ACC. As a result, it is recommended that it is appropriate in these specific circumstances to permit the airspace trial to last longer than the usual period of six months as detailed in paragraph 8 (4) in order to maintain a high standard of safety in the provision of Air Traffic Services pending the outcome of the permanent ACP. The conditions of approval detailed below, which are broadly a continuation of the Phase C trial conditions, are assessed as sufficient to mitigate any so far unseen safety issues that may arise during the extended trial period. The sponsor is required to have robust procedures to continually manage their trial – including provisions for the termination of the trial should be objectives not be met or if safety is compromised at any point.	

PART B – Airspace Change Process – STAGE 5			
B.1	Subject Matter Expert (SME) Regulatory Assessments NOTE: this captures RAG status only – full details contained within each of assessment (hyperlinks inserted below)		
ATM Safety	<i>NOT APPLICABLE</i>	Environmental	<i>NOT APPLICABLE</i>
Economic Assessment & Statement	<i>NOT APPLICABLE</i>	Instrument Flight Procedure	<i>NOT APPLICABLE</i>
Engagement / Consultation	<i>NOT APPLICABLE</i>	Operational	<i>NOT APPLICABLE</i>
B.1.1	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)? N/A		
B.2	Other Relevant Documents (title and hyperlinks to be inserted)		
Sponsor Letter to CAA 170626		03 RNAV Trial Periodic Reports and Feedback	EGKB RNP03 Phase C Plan V2.0.docx
ACP-2026-015 Introduction of EGKB RNP RWY03 - Statement of Need		AIP SUP Phase C Extension to end of 2027 v0.1 Draft.docx	
B.3	Has the relevant legal and policy framework to the airspace change process been taken into account, including: the Air Navigation Directions;		Y

	• the Airspace Modernisation Strategy; • section 70 of the Transport Act 2000; • the Air Navigation Guidance 2017; and • CAP 1616 and associated publications?	
B.4	CAA consideration of whether the proposal is in accordance with the Airspace Modernisation Strategy (Air Navigation Directions, direction 5(1)). <u>NOTE:</u> 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 (CAP 1616f, 6.61). For more information on the AMS strategic objectives, see <i>Airspace Modernisation Strategy 2023-2040 Part 1: Strategic Objectives and Enablers</i> (CAP 1711).	
Safety	The trial to date has shown the safe integration of, and accurate adherence to, an innovative IFP design within Class G airspace. The sponsor has argued for the trial to be extended based primarily on safety reasons – notably the higher levels of flight profile conformance and predictability offered by the RNP 03 approach compared to the extant visual circling manoeuvre for Runway 03. Adjacent ANSPs, operators and airspace users have become familiar with the presence of the IFP. Air Traffic Controllers at both LBHA and Swanwick ACC are now trained and competent using the procedures. Requiring a withdrawal of the trial procedure pending the CAA decision on the permanent ACP would lead to confusion amongst airspace users, and the evidence to date during the trial demonstrates the Transport Act 2000 section 70 (1) requirements are met by the recommendation to approve the trial extension broadly based on existing Phase C conditions stated in the CAA Statement on 19th March 2026.	
Integration of diverse airspace users	N/A	
Simplification of airspace system	The design being trialled is complex due to the extant airspace constraints surrounding LBHA but the trial to date has demonstrated accurate adherence to the designed IFP and a reduction in cockpit workload when compared to the visual approach to Runway 03 (following adherence to the RNP procedure for Runway 21). These designs optimise aircraft capability by using their best navigational equipment performance utilising RF turns within an RNP approach, increasing predictability of flight paths for all stakeholders. Accurate adherence to the procedure has meant no CAS incursions have been identified to date either.	

Environmental sustainability	N/A
B.5	CAA consideration of factors material to our decision whether to approve the change (section 70, Transport Act 2000). <u>NOTE:</u> 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 (CAP 1616f, 6.80).
Maintain a high standard of safety in the provision of air traffic services section 70(1)(a)	The trial to date has shown the safe integration of, and generally accurate adherence to, an innovative IFP design within Class G airspace. The sponsor has sought feedback from 11 flights where RF capability has been questioned as a result of the observed flight path but none of these have infringed Gatwick CTA. The sponsor has argued for the trial to be extended based primarily on safety reasons – notably the higher levels of flight profile conformance and predictability offered by the RNP 03 approach compared to the extant visual circling manoeuvre for Runway 03. Adjacent ANSPs, operators and airspace users have become familiar with the presence of the IFP. Air Traffic Controllers at both LBHA and Swanwick ACC are now trained and competent using the procedures, so withdrawal of the trial procedure pending the CAA decision on the permanent ACP would lead to confusion amongst airspace users. Given the trial feedback to date, the Transport Act 2000 section 70 (1) requirements do appear to be met in order to recommend the approval of the trial extension based on the existing Phase C conditions stated in the CAA Statement on 19th March 2026, however the CAA can only confirm the permanent procedure maintains a high standard of safety once it has been assessed in accordance with the permanent airspace change process under CAP1616. The CAA will be kept informed of any incursions of CAS that occur and any other incidents that would require an MOR. The subsequent investigation into any incident during the trial may result in the CAA suspending or ending the trial. These procedures are covered within the existing Phase C conditions detailed in the CAA Statement dated 19th March 2026 and are recommended as a continuing condition of approval for the trial extension.
Secure the most efficient use of airspace consistent with the safe operation of aircraft and the expeditious flow of air traffic	So far the trial has demonstrated, through the use of an innovative procedure, that an RNP Instrument Approach Procedure can be designed within Class G airspace against adjacent controlled airspace constraints, thus securing an efficient use of airspace.

section 70(2)(a)	
Satisfy requirements of operators and owners of all classes of aircraft section 70(2)(b)	There has been no feedback so far from general aviation regarding issues with the RNP approach to Runway 03. All feedback from LBHA operators has been positive.
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 section 70(2)(c)	Proportionate engagement with local communities and stakeholders has occurred throughout the trial. As of 3 August, 34 noise complaints had been received from stakeholders, which have been reviewed. All of these were received in mid/late July, coinciding with the period where the trial procedure was in consistent use due to the prevailing wind conditions. The majority were from locations in Godstone and Oxted and none related to specific flights. None of the complaints suggested impacts from the trial that were different from those anticipated. While some stakeholders expressed concerns about the noise impact, they will be able to provide their feedback as part of the consultation for the permanent ACP. It is recommended that all relevant stakeholders are updated as a condition of approving any trial extension.
Take into account the Secretary of State's guidance relating to spaceflight activities section 70(2)(ca)	N/A
Take into account the Secretary of State's guidance on environmental objectives section 70(2)(d)	N/A
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	N/A

section 70(2)(e)	
Take account of the interests of national security section 70(2)(f)	There are no national security implications for this proposal.
Take account of any international obligations notified to the CAA by the Secretary of State section 70(2)(g)	No such international obligations have been notified to the CAA under section 70(2)(g) of Transport Act 2000.
B.6	Are there any other associated publications relevant to the proposal and, if so, have the requirements of those publications been met? <u>NOTE:</u> associated publications include Airspace Policy Statements listed here.
B.6.1	In addition to the legislative requirements stated above, the proposal met and continues to meet IFP requirements detailed in CAP785B. A full IFP assessment occurred before the sponsor was granted permission to move from Phase A to Phase B. Trial evidence to date shows no further significant IFP issues have been identified, with any non-conformance being generally explained by Class G flight behaviours - however the sponsor is currently awaiting feedback from 10 flights in July 2026 that could indicate non-RF capability for specific flights. Additionally, a minor LAT/LONG accuracy issue has been identified by the IFP team for the reporting point ALKIN (needs to be published down to 2 decimal points) and the sponsor will be requested to amend this in the AIP SUP for the trial extension.
B.7	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. <u>NOTE:</u> this section only applies if the CAA is classifying or amending the classification of UK airspace.
B.7.1	N/A – trial is entirely within Class G airspace and there are no proposed changes to Biggin Hill airspace.

PART C – Stage 5 Recommendation	
C.1	Taking the above information into account, what is your recommendation to the decision-maker for this proposal?
C.1.1	Recommendation: APPROVED WITH CONDITIONS. The arguments made by the sponsor highlight the operational safety impact of not extending the trial pending the outcome of the permanent ACP. These include the potential for creating confusion amongst operators by withdrawing the trial procedures prior to re-instating them should the permanent ACP be approved. The sponsor also cites airspace users and adjacent ANSPs that have built awareness of the trial procedure and its operating environment, whilst the RNP 03 instrument approach maintains a higher standard of safety than the extant visual circling approach for Runway 03. Human factors risks are highlighted too based around ATCO currency and training/competency maintenance at both LBHA and Swanwick ACC. In addition to the arguments made by the sponsor, the feedback to date on the trial has seen no CAS incursions and the IFP flown to satisfactory levels of accuracy. The FMS issue for certain operating types identified within Phase B has been rectified by the FMS coding houses, and no adverse feedback has been received from either local communities or operators. It is recommended that the trial extension pending the CAA's decision on the permanent airspace change is approved for one year in accordance the following conditions: 1. The RNP Approach Procedure for Runway 03 shall be promulgated in the UK AIP via an AIP Supplement. The SUP should reinforce expected level adherence at each 5LNC on the RNP Approach Procedure. 2. Clear entry and exit criteria are established for the extended trial period, and agreed with the relevant ATM Inspector, in accordance with CAP 670 GEN.03. This includes robust procedures for suspending the trial should an incident occur, in accordance with the Safety Risk Assessment. 3. The sponsor shall take due cognisance of ACP-2023-027 and ACP-2023-077 with regards to objective 3, should implementation of either of those ACP's occur within the extended trial period. 4. The sponsor shall provide monthly updates to the CAA throughout the trial period, including nil to report, on flight procedure adherence, reports submitted in accordance with the relevant unit Safety Management System, and any operator or stakeholder feedback. 5. The sponsor shall provide an interim trial report in accordance with CAP 670 GEN.03 requirements by 11th December 2026 as indicated in the CAA Statement dated 19th March 2026. The CAA will require a further full report prior to any decision on ACP-2026-015, and it is recommended that the compliance date for the final report is determined in accordance with progress on ACP-2026-015. Both the interim and the full report will need to detail evidence gathered throughout all phases of the trial, including procedure use numbers and time of day used, any operational or stakeholder feedback, flight procedure adherence data and any data collected in accordance with the Safety Management System of

	the participating ATC. 6. A review of the trial shall occur between the sponsor and the CAA after 9 months of the extension period commencement to allow the CAA to decide whether a further time extension can be granted. The assessment factors should include whether suitable progress is being made on the permanent ACP; whether the trial objectives are being met; and whether the trial continues to maintain a high standard of safety. The recommended conditions of approval <i>prior</i> to the trial extension are detailed in C.2.1.	
C.2	Are there any Recommendations and/or Conditions for the change sponsor to address prior to implementation (if approved)?	Y
C.2.1	Condition 1) All relevant stakeholders are updated prior to commencement of the trial extension. Condition 2) Copies of all extended TOIs and the associated Letters of Agreement with Swanwick and adjacent ANSPs are to be provided to the ATS Inspector for review at least 30 days prior to expiry of the current TOIs and LoAs. Condition 3) The sponsor shall update the Trial Plan and send a copy to the CAA, with a redacted copy to be published on the Airspace Change Portal once the CAA decision has been promulgated. Condition 4) The sponsor shall update the ALKIN coordinates and the associated True Tracks displayed on the procedure chart and coding table within the AIP Supplement.	
C.3	Are any other consents and approvals needed in order to permit the intended operation (title and hyperlinks to be inserted)?	
C.4	Are there any other comments/observations for the decision maker?	N
C.4.1	N/A	
C.5	Regulator's Signature	

Technical Regulator			<i>1st September 2026</i>
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PART D – Final Regulatory Decision – Comment/Approval [Delete signatory rows below dependent on Decision Maker]			
Airspace Regulation Principal comments and recommendation:			
Airspace Regulation Principal			<i>11/09/2026</i>

