

Temporary or Trial ACP for BVLOS – additional guidance

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Civil Aviation Authority
Aviation House
Beehive Ring Road
Crawley
West Sussex
RH6 0YR

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Enquiries regarding the content of this publication should be addressed to: airspace.policy@caa.co.uk

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Temporary or Trial ACP for BVLOS – additional guidance

Currently, Remotely Piloted Aircraft Systems (RPAS) being flown beyond visual line-of-sight (BVLOS) do not have the capability to operate in accordance with the rules of the air and as such need to be operated in special use airspace, to minimise the risk of airborne collision.

As RPAS operators often need to operate their aircraft in different locations or in one location for a short period of time, these volumes of airspace are not required permanently and therefore will follow the Temporary Airspace Change Process (or the Trial process if the relevant requirements are met) as detailed in [CAP 1616G](#).

The Airspace Change 'Sponsor' and the RPAS 'Operator' are distinct and separate functions within the process. These functions can be fulfilled by two entities, or combined by the RPAS Operator to fulfil both functions. Where this is the case, care should be taken to ensure that the processes for both functions (as per the process diagram below) are fulfilled in their entirety.

Given the nature of these types of proposal, there are additional requirements that must be satisfied while the application progresses through the airspace change process to ensure that a decision on the ACP can be made in a timely manner.

It is important to note that the ACP and Operational Safety Case (OSC) application processes are separate functions but are interdependent. **For a BVLOS ACP to be approved an Operational Authorisation must also be issued by the CAA.**

There may be a regulatory requirement for CAA Air Traffic Management (ATM) and Aerodromes approval in addition to Airspace Regulation as part of an ACP. The Sponsor will need to clearly articulate whether the proposed activity will require regulatory input from these areas.

Stage 1 Define

It is recommended, prior to the sponsor submitting a statement of need (SoN) a high-level concept of operations (CONOPs) is developed in conjunction with the RPAS operator. This will aide in the identification of additional regulatory areas (i.e., ATM & Aerodromes) and identification of any initial hazards, ground & air:

- The sponsor should submit the SoN prior to the RPAS operator applying for an OA through the OSC application process.
- Once an ACP application number has been assigned the sponsor should provide this to the RPAS operator.
- The RPAS operator should reference ACP number within the operations manual (OM) for the Operational Risk Assessment (ORA).

It is important to ensure that the information submitted within the SoN is reflected correctly within the ORA as CAA colleagues from the Airspace Regulation (and ATM and Aerodromes where appropriate) and the RPAS sector team can conduct an initial review of both applications prior to an Assessment Meeting being held. During the review the CAA need to clearly understand the requirements from the sponsor to ensure the correct CAA areas are in attendance at the Assessment Meeting.

Once the sponsor has submitted the SoN an Account Manager will be assigned to manage the ACP application. The Account Manager will liaise between CAA areas.

Once the RPAS sector team have received the initial operations manual with associated ORA, a basic review will be conducted. This is an internal check and not a full assessment requiring an oversight report, but the RPAS sector team may require additional information and directly request this from the RPAS operator. It is recommended that the RPAS operator informs the sponsor of this so that any related documentation can be aligned. This review is in place to ensure that the Operator understands what is required to be included in the OSC, even though not all of the relevant information can be included at this stage.

If other CAA departments are required, e.g., ATM & Aerodromes or dangerous goods (DG), the relevant documents will be shared and reviewed by them. Feedback on this information will be provided at the Assessment Meeting

Throughout the process it is recommended that continuous communication between the sponsor and RPAS operator as all submitted information must be correctly reflected within all documentation.

The requirements for the Assessment Meeting and Stage 1 are detailed in [CAP 1616G](#) and include:

- A briefing to the CAA on the objectives of the airspace change proposal, including the current-day scenario
- An indicative timeline detailing target dates for submission of the airspace change proposal, CAA decision and implementation.
- Output from the Assessment Meeting.

The Account Manager will confirm how the process described in CAP 1616G can be scaled either during or following the Assessment Meeting, depending on the consideration required. The CAA will also indicate if the decision on the proposal is likely to be made at a higher level than Principal Airspace Regulator and the likely impact to the decision timescale.

Following the Assessment Meeting, the proposed implementation dates should be forwarded by the Account Manager to AROps so that they can assign an Activity Number to the project and make an initial assessment of any potential conflicting activity.

Stage 2 Develop and Assess

Following the Assessment Meeting, the Sponsor will develop their proposal and draft the required Impact Assessments.

When developing airspace design option(s) the change sponsor should ensure that they address the statement of need and align with the objectives of the airspace change proposal. There is no requirement to develop more than one option, however there may be situations where having more than one option and seeking feedback from stakeholders on them, may be beneficial. For example, where a number of different routes are possible, stakeholders will be able to provide feedback on the likely impacts of each route, allowing the sponsor to select the most appropriate.

[Policy for the Establishment and Operation of Special Use Airspace \(SUA\)](#) can be found on the CAA website.

The sponsor may require guidance on CAA policy or guidance/AMC while developing their proposed option(s). **Enquiries related to the ACP should be channelled through the ACP Account Manager who will disseminate as appropriate.**

Additional guidance may include:

- Airspace design considerations - the RPAS operator should confirm with the sponsor that the airspace design volume is sufficient to ensure that the uncrewed aircraft (UA) can operate safely within it.

- Air and ground hazards identified through the ORA as per [UK Regulation 2019/947, article 11](#).

As stated in CAP 1616G, the sponsor may find it beneficial to submit their Stage 2 material to the CAA for review, prior to commencing the engagement activities in Stage 3.

Stage 3 Engage

Once the proposed design is complete, the sponsor will undertake a period of targeted engagement with identified stakeholders - these may be other airspace users such as the military, GA, HEMS, pipeline inspection aircraft operators etc. - and this will depend on the location of the proposed SUA, its size, shape, hours of operation, provision of a crossing service as well as other factors. **Engagement should be for a minimum of 4 weeks. This shorter period of engagement reflects the likelihood that the impacts of the proposed airspace structure will be low.** In certain circumstances where the impact of the proposal has the potential to be higher, a longer period of engagement may be required by the CAA.

Other than the minimum required period of engagement, the Stage 3 requirements are the same as those detailed in [CAP 1616G](#) unless the process has been agreed to be scaled following the Assessment Meeting.

Throughout the engagement it is important to note:

- The design of the proposed airspace structure(s) may require amendment following stakeholder feedback
- Where ANSPs, aerodromes and other airspace users are involved or impacted, Letters of Agreement (LoAs) or Temporary Operating Instructions (TOIs) may be required to be developed and agreed.

Sponsors should allow sufficient time following engagement to ensure that feedback received during engagement can be properly considered and amendments made where required. This includes the development of any necessary LoAs or TOIs.

Stage 4 Update and Submit

Stage 4 requirements are detailed in [CAP 1616G](#). For Trials, some additional information will be required as detailed in the relevant template.

It is important to highlight that recent experience has shown that for those ACPs where the sponsor of the change is not the operator of the RPAS, this can introduce its own challenges, particularly when ensuring that documentation that is generated at this stage (ACP, OSC, LoAs, TOIs, etc.) are coherent across applications.

It is particularly important at this stage to ensure that the final submitted documentation is accurate and correct. This can be achieved through appropriate communication by all applicant organisations.

Please note:

- Any agreements on the procedures between both the ANSP and RPAS operator, must be correctly reflected within the OM, the LoA and TOI.
- Copies of agreed TOIs and LoAs should be included with the ACP submission as this enables the AAA CAA areas to conduct reviews in conjunction with the RPAS sector team.
- A full ORA should only be completed once the SUA proposed design has passed Stage 3 and the route and airspace design has been finalised.
- The OM with the ORA should be updated with the relevant information by the RPAS operator and submitted to the RPAS sector team for a final assessment. It is recommended that the sponsor reviews the OM and ORA with the RPAS operator prior to the final submission.
- Only once the OM and ORA has been submitted should the sponsor submit the final ACP proposal.
- The RPAS sector team will communicate directly with the RPAS operator during the ORA assessment. It is very important that the RPAS operator updates the sponsor regarding any potential amendments to the application.

Once the sponsor has developed their final proposal, they submit it to the CAA (including supporting documentation).

Stage 5 Decide

The ACP Account Manager, will disseminate the submitted documentation to the relevant CAA SMEs for assessment, where appropriate. Additionally, the ACP Account Manager will communicate directly with the RPAS sector team to understand the progress of the OSC application.

The ACP Account Manager will forward the proposal to Airspace Regulation Operations (AROps) who will plot the airspace and recheck for any known conflicts during the proposed period of operations. AROps will advise the Airspace Technical Regulator of the outcome of their work and if any amendments are required by the sponsor. If the airspace plots correctly, AROps will draft a Notice to Aviation (NOTAM) template for the sponsor to use if the decision is to approve the SUA.

If there are LoAs or TOIs or other changes relating to an ANSP, these will need to be reviewed by the ATM team as part of the ACP approval process, including any associated safety assessment.

The CAA aims to decide on Temporary/Trial BVLOS ACPs within a minimum of 28 days from submission but may be longer depending on the complexity of the proposal. This is dependent on all required information being submitted and, in some cases, the CAA will request further information before the decision period begins. As the ACP is dependent on an Operational Authorisation (OA) from the RPAS sector Team, the decision period may be extended to allow the CAA time to assess the OSC application. The decision on the ACP can be made before the OA in exceptional circumstances, where the RPAS sector team is content that the OA can be completed before implementation. No flying will be permitted until the OA is received by the operator.

The Account Manager will ensure that the decision maker has sufficient time to examine the proposal and the decision documentation before the meeting with Regulators to make the final decision.

As these types of change often involve novel procedures and equipment, sponsors should have a contingency back-up implementation date, should the CAA request additional clarification or information to enable a decision to be made on the proposal which takes the decision beyond the initially planned date.

Where it has been indicated that the decision maker will be at a level above Principal Airspace Regulator, this will have been reflected in the output from Stage 1.

Stage 6 Implement

If the decision is to approve the ACP, the Sponsor (or the CAA where required) will submit the relevant draft document (AIC/SUP etc.) to AIS to provide information about the activity to other airspace users.

The implementation period will need to be of sufficient length to ensure that any conditions on the approval can be completed. This may include ANSP training or installation and certification of equipment, for example.

If the decision is made to approve the proposal, and the sponsor has met any conditions placed on the decision, CAA will provide the sponsor with an activity reference number which can be submitted to activate the temporary airspace structure. **Any activation request will need to be submitted in accordance with the timescales set out in the decision.** If there will be a requirement to cancel the NOTAM out of AROps hours (Mon-Fri 0830-1630), the sponsor will need to submit named individuals to the CAA who will be able to cancel a NOTAM directly with the NOTAM Office, outside of AROps hours. If the sponsor has undertaken an Airspace Trial, a post-trial report must be submitted to the CAA following the conclusion of the trial, as detailed in [CAP 1616G](#).

Temporary or Trial ACP Process for BVLOS

