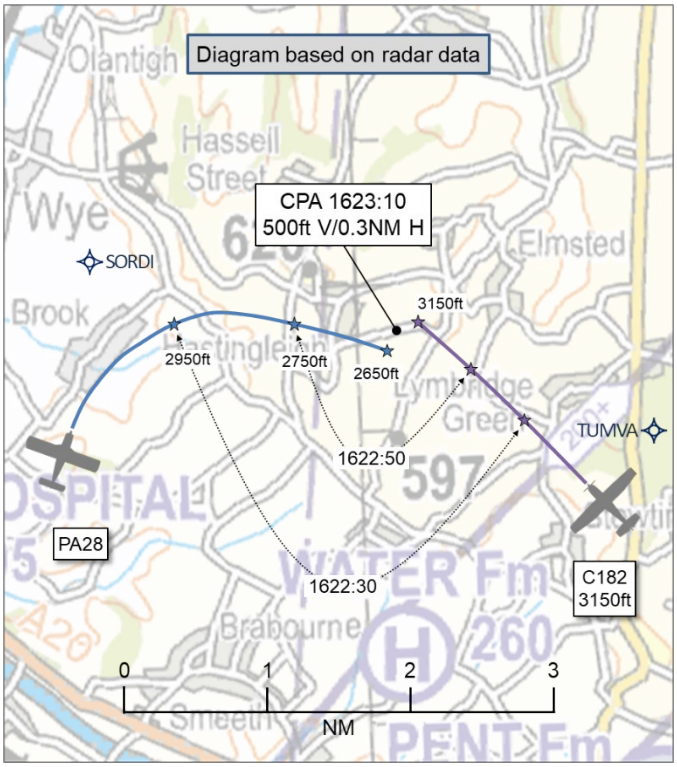
AIRPROX REPORT No 2025125

Date: 27 Jun 2025 Time: 1623Z Position: 5110N 00101E Location: 5NM E Ashford

PART A: SUMMARY OF INFORMATION REPORTED TO UKAB

Recorded	Aircraft 1	Aircraft 2
Aircraft	PA28	C182
Operator	Civ FW	Civ FW
Airspace	London FIR	London FIR
Class	G	G
Rules	IFR	NR
Service	Procedural	None
Provider	Lydd	N/A
Altitude/FL	2650ft	3150ft
Transponder	A, C, S	A, C, S
Reported		
Colours	Burgundy, white	NR
Lighting	Anti-col, landing	Strobes, taxy, lndg
Conditions	IMC	VMC[1]
Visibility	<5km	NR
Altitude/FL	2700ft	3200ft
Altimeter	QNH (1023hPa)	QNH (1024hPa)
Heading	108°	NR
Speed	120kt	NR
ACAS/TAS	PilotAware	Other
Alert	TA	None
Separation at CPA		
Reported	"*Not seen*"	300ft V/0.5NM H
Recorded	500ft V/0.3NM H	



THE PA28 PILOT reports that, at approximately 1623, it is almost certain that a mid-air collision would have occurred if they had not taken evasive action. They were flying the RNP Y RW21 procedural approach at Lydd, to allow a safe landing due to low cloud. They maintained 3200ft in line with the published approach procedure, routeing towards SORDI from the west [they recall]. Whilst approaching SORDI, they became aware of [the C182] on their electronic conspicuity device, heading on a course to intercept the track between SORDI and TUMVA, at an altitude of 3200ft. They continued to monitor the path and altitude of the aircraft [on their EC device] and raised their concerns to the Lydd Approach controller who, understandably, could not provide deconfliction [advice]. However, they suggested an early descent to 2700ft. That suggestion, they strongly believe, saved their life. [The pilot of the PA28 commented that they had not visually acquired the C182.]

On landing, they discussed the incident with the controller who [reportedly] advised that they would call [another ANSP] to raise their concern. [The pilot of the PA28 opined that] the lack of regard for the instrument approach, flying at the exact altitude of the procedure [was extremely concerning].

The pilot assessed the risk of collision as 'High'.

THE C182 PILOT declined to submit a full report in the belief that an Airprox had not taken place, however, they provided the following details of their flight:

Their route had been from DEVAL [on the London/Paris FIR boundary] to Folkestone, then to [their destination]. They had been flying with the autopilot engaged at 3200ft QNH (1024hPa). Their aircraft

[1] The pilot of the C182 reported that they had operated in VMC, however, it was established that they had not been 1000ft vertically clear of cloud when above 3000ft, therefore they had been in IMC.

is equipped with a transponder with ADS-B-out capability. Other traffic, transmitting ADS-B, is shown on a display.

They were flying in 'gin-clear' VMC [they believe] with scattered/broken cloud at least 300ft below. Both they, and their passengers, saw another aircraft at a distance of at least 0.5NM, and it passed down their left-hand side at least 300ft below them. It was in and out of cloud. They attempted to identify the aircraft with their ADS-B-in full-screen function, but it did not appear. They had seen other aircraft on their display that day. They wondered what the [pilot of the PA28] was doing, flying in that location in marginal conditions.

On arrival [at their destination], they were informed by the AGO that they should contact the Lydd controller because, reportedly, they had passed through a restricted or protected area. The Lydd controller advised them that a pilot had reported seeing the C182 on their EC device whilst they had been carrying out an RNP approach into Lydd. The Lydd controller reportedly advised them that the approach encompassed airspace up to 12NM and 3200ft. The pilot of the C182 believes that they had been 13NM from Lydd at that point. The Lydd controller suggested that they call Lydd if routeing that way in the future.

The pilot of the C182 noted that the approach 'feathers' on the UK VFR 1:500,000 scale chart for Lydd RW21 extend to a distance of 8NM from the runway and suggested that a listening squawk could be implemented at Lydd for use by pilots of transiting aircraft so that they could be contacted if instrument approaches are being carried out.

Figure 1 – A screenshot from a video taken from the flight of the C182 showing the PA28.

Figure 2 – A (cropped) photograph of the PA28 taken by a passenger onboard the C182.

THE LYDD CONTROLLER reports that [the pilot of the PA28] informed them, as the Lydd APP controller on TWR/APP combined position, that they had detected traffic at a similar altitude (3200ft AMSL) in the vicinity of the RNP Y RW21 initial approach segment in Class G airspace. In response, they warned them that such traffic was unknown (this had been a Procedural Service and there is no ATS surveillance system or an approved FID). No other pilot was in contact with Lydd APP.

A change of altitude was then requested by the pilot [of the PA28] to which they suggested 2700ft AMSL, coincident with the RNP Y RW21 step down level on the final approach track, ensuring a terrain-safe/above-MSA stable approach and no threat from the (inactive) EGD141 for which the published initial approach level is 3200ft. The pilot was satisfied with the advice and descended to 2700ft AMSL.

[The PA28] landed safely and the pilot expressed appreciation for their assistance in revising the initial approach level and articulated a firm desire for the other pilot to be made aware of Lydd's Instrument Approach Procedures (IAPs). [The Lydd controller] agreed and, owing to the risk of the situation being repeated by the unidentified pilot, utilised a web-based ADS-B application as a means of potentially establishing the aircraft's identity. [The destination of the C182 pilot] was ascertained and the AGO [at that airfield] was asked to request that the pilot telephone Lydd. The sole objective of the conversation, to highlight the existence of Lydd IAP and recommend the pilot establish two-way communication to

promote a safe operating environment, was achieved positively. They reassured [the pilot of the C182] that no blame was being apportioned. The [pilot of the C182 reportedly] said that they had been conscious of the IAP feathers on the chart and had routed 10NM or more from the airport but had been unaware that Lydd's IAP extended beyond 10NM to 12-14NM. A mutual consensus was reached that the note on the CAA VFR chart may have been insufficient for Lydd as it states that 'pilots are strongly recommended to contact an aerodrome ATSU before flying within 10NM of any aerodrome marked with instrument approach feathers'. The telephone call ended cordially with the pilot thankful for the information and guidance.

Factual Background

The weather at Lydd was recorded as follows:

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ETAR EGMD 271620Z 22017KT 9999 SCT004 20/18 Q1022
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The UK AIP provides the following instrument approach chart for RNP Y RW21 at Lydd:

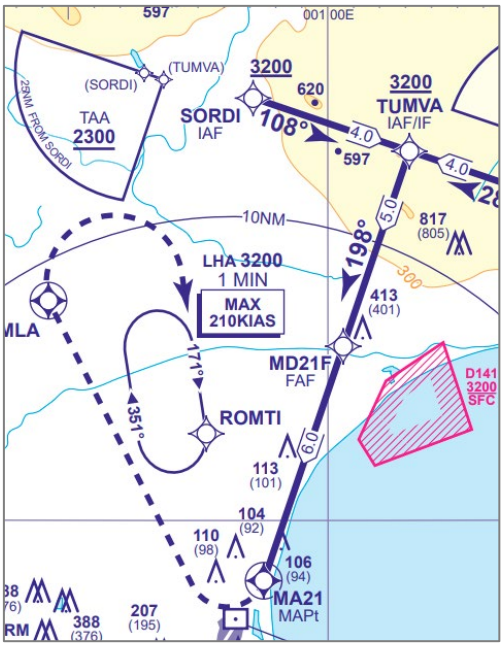


Figure 3 (UK AIP AD 2. EGMD-8-3)

Analysis and Investigation

CAA ATSI

Only the PA28 pilot was in receipt of an ATS. The C182 was not known traffic to the Lydd controller and they would not have been able to pass Traffic Information to the pilot of the PA28.

Conflicts between aircraft on IAPs in Class G airspace and others in transit through that IAP (where the ATSU has no surveillance capability) has been raised by CAA ATM/ATSI as a risk at the CAA Key-Risk-Area Safety Review Panel and is currently under review.

UKAB Secretariat

An analysis of the NATS radar replay was undertaken and both aircraft could be positively identified from Mode S data (Figure 4). The diagram was constructed and the separation at CPA determined from the radar data. The PA28 was observed on the NATS radar replay with 'Enhanced' Mode S returns but was not observed by reference to ADS-B data sources. The C182 was observed by reference to ADS-B data sources.

The pilot of the C182 reported that they were flying in VMC, however, also reported that they were "*300ft above scattered/broken cloud*". (UK)SERA.5001 'VMC visibility and distance from cloud minima' provides the following criteria:

Below 10,000ft AMSL and above 3000ft AMSL (in Class G airspace):

Visibility 5km.
1500m horizontally and 300m (1000ft) vertically from cloud.

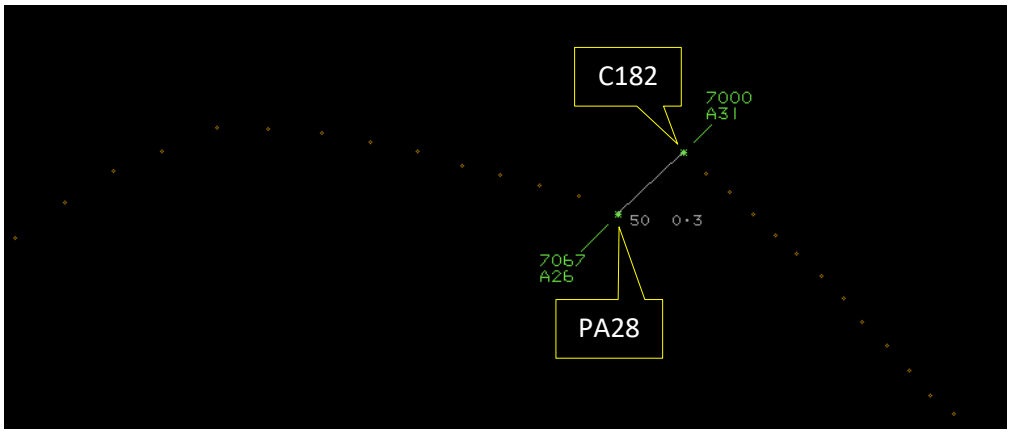


Figure 4 – CPA at 1623:10 (with Mode C altitudes corrected to 'radar' QNH 1020hPa).

The Air Traffic Safety Manager at Southend Airport confirmed that the pilot of the C182 had contacted Southend Radar to request a Basic Service at 1624:43, after CPA.

The PA28 and C182 pilots shared an equal responsibility for collision avoidance and not to operate in such proximity to other aircraft as to create a collision hazard.[2] If the incident geometry is considered as head-on or nearly so then both pilots were required to turn to the right.[3] If the incident geometry is considered as converging then the PA28 pilot was required to give way to the C182.[4] VFR flights [above 3000ft AMSL] shall be conducted so that the aircraft is flown in conditions of visibility and distance from clouds equal to or greater than those specified.[5] An IFR flight operating in level cruising flight outside controlled airspace shall be flown at a cruising level appropriate to its track as specified in the table of cruising levels.[6]

Summary

An Airprox was reported when a PA28 and a C182 flew into proximity 5NM east of Ashford at 1623Z on Friday 27th June 2025. The PA28 pilot was operating under IFR in IMC, in receipt of a Procedural Service from Lydd. The C182 pilot was operating in IMC, not in receipt of a FIS. The flight rules under which the C182 pilot had been operating could not be determined.

PART B: SUMMARY OF THE BOARD'S DISCUSSIONS

Information available consisted of reports from both pilots, a report from the air traffic controller involved and radar photographs/video recordings. Relevant contributory factors mentioned during the Board's discussions are highlighted within the text in bold, with the numbers referring to the Contributory Factors table displayed in Part C.

The Board first discussed the actions of the pilot of the PA28 and it was noted that they had been in receipt of a Procedural Service whilst under IFR. Members recalled the wording of CAP 774, Ch.5, Procedural Service 5.1:

[2] (UK) SERA.3205 Proximity.
[3] (UK) SERA.3210 Right-of-way (c)(1) Approaching head-on.
[4] (UK) SERA.3210 Right-of-way (c)(2) Converging.
[5] (UK) SERA.5005 Visual flight rules.
[6] (UK) SERA.5025 IFR. Rules applicable to IFR flights outside controlled airspace (a) Cruising levels.

> Procedural Service is an ATS where, in addition to the provisions of a Basic Service, the controller provides restrictions, instructions, and approach clearances, which if complied with, shall achieve deconfliction minima against other aircraft participating in the Procedural Service. Neither traffic information nor deconfliction advice can be passed with respect to unknown traffic.
>
> A Procedural Service does not require information derived from an ATS surveillance system. Therefore, due to the ability for autonomous flight in class G airspace, pilots in receipt of a Procedural Service should be aware of the high likelihood of encountering conflicting traffic without warnings being provided by ATC.

It was noted that the EC device fitted to the PA28 had alerted to the presence of the C182 and, from their description of the unfolding encounter, the PA28 pilot had been most concerned by its proximity and, perhaps, startled by its presence. Members noted that, by informing the Lydd controller of their situation, a suitable course of action had been formulated (a descent to 2700ft) and conducted safely. Members noted that they had not visually acquired the C182 at any stage during the encounter.

Members next turned their attention to the actions of the pilot of the C182 and were disappointed that they had chosen to not fully engage with the Airprox process, although appreciated that they had provided a brief description, a video and a photograph of their flight. The Board wished to emphasise that, even if they had believed that safety margins had not been eroded from their perspective, analysis of a reported Airprox event is for the benefit of flight safety in general and may cover details, experiences and lessons from which many others may find value. Notwithstanding, the pilot of the PA28 had reported that they had been concerned by the proximity of the C182 which, in itself, categorised this event as an Airprox without requiring consensus between the parties involved.

Members returned to their discussion and the meteorological conditions were considered. The pilot of the C182 had reported that they had been in 'gin clear VMC', however, also reported that they had been 300ft above the cloud-tops. Whilst the METAR observation at Lydd (3min before CPA) had indicated scattered cloud at 400ft, the photograph and video provided by the pilot of the C182 appeared to show an almost overcast layer of cloud. Members were keen to point out that, even if the visibility above a cloud layer had been in excess of 10km, the vertical separation from cloud must have been at least 300m (1000ft) to have been considered VMC. Consequently, members agreed that the C182 pilot had actually been in IMC at that time. Further, as IMC precludes flight under VFR, the pilot of the C182 must have operated under IFR (although that was not specifically declared in their description of their flight). Accordingly, the pilot of the C182 had been obliged under the provisions of (UK) SERA.5025 to have selected an appropriate Flight Level for their chosen heading during their cruise (known colloquially as the 'Semi-circular rule'). Members noted that the C182 pilot had been tracking approximately north-westwards and should therefore have maintained an 'even' number of thousands of feet (for example, 4000ft) or to have climbed to more than 1000ft above the tops of the clouds (if possible) to have entered VMC. Members agreed that the pilot of the C182 had not complied with the regulations pertaining to flight under IFR and had not selected a cruising altitude in accordance with the 'Semi-circular rule'.

Members next noted that Lydd aerodrome is depicted on VFR navigational charts with 'feathers' denoting the presence of at least one Instrument Approach Procedure. The length of the feather symbol itself does not indicate a range to which the IAP extends. Members felt that it would be highly likely that aircraft being flown to the procedure may be encountered in the vicinity of the aerodrome. Therefore, members considered it wise for a pilot transiting nearby to gather situational awareness of any traffic that may affect their flight. Indeed, it was noted that VFR navigational charts provide a 'strong recommendation' that pilots contact the ATSU in question when flying within 10NM of the aerodrome in question. It was noted that the pilot of the C182 had not been in receipt of a service at the time of the Airprox and, even though they had flown no closer than approximately 13NM from Lydd during their flight, members agreed that it would still have been prudent to have contacted the Lydd controller for a service or, at least, to have relayed their intentions as they passed through the area. Indeed, CAP 774, Ch.5, Procedural Service 5.1 provides the following guidance:

> Pilots flying in the vicinity of aerodromes, ATS routes, or navigational aids where it is known that a Procedural Service is provided, are strongly encouraged to attempt to establish RTF contact with the notified ATS provider.

Members agreed that such contact might have provided timely situational awareness for the benefit of the Lydd controller and for any other pilots in the vicinity. Additionally, the C182 pilot may have gained situational awareness of the presence of the PA28 through reciprocal Traffic Information from the controller. The EC equipment fitted to the C182 would not have been expected to have detected the PA28, and members agreed that the C182 pilot had not had situational awareness of the PA28 until it had been visually acquired.

The actions of the Lydd controller were next considered and members noted that, without the use of approved surveillance equipment, they had not been able to detect the C182. Members noted the C182 pilot's suggestion of the use of a 'conspicuity squawk' but pointed out that that would not be feasible for the same reason. Members agreed that the controller had not had situational awareness of its presence and could not have been able to provide a caution to the pilot of the PA28. Members commended the Lydd controller's actions, having assisted the PA28 pilot by suggesting a lower, and safe, altitude at which to continue their approach. Members agreed that there had been little else that they could have done to have assisted matters further.

Concluding their discussion, members appreciated that the pilot of the PA28 had been concerned by the presence of the C182 but noted that they had taken suitable and effective actions to resolve the situation. Members felt that the limitations of a Procedural Service provided by an ATSU without surveillance capability, and flown in IMC, had been demonstrated in this encounter. Members were satisfied that normal safety margins had pertained and that there had not been a risk of collision. The Board assigned Risk Category E to this event

Members agreed on the following contributory factors:

CF1. The Lydd controller had not had situational awareness of the presence of the C182.

CF2. The pilot of the C182 had not complied with the regulations pertaining to flight under IFR.

CF3. The pilot of the C182 had selected a cruising level inconsistent with the 'Semi-circular rule'.

CF4. It would have been prudent for the pilot of the C182 to have contacted the Lydd controller.

CF5. The pilot of the C182 had not had situational awareness of the presence of the PA28 until visually acquired.

CF6. The PA28 pilot was concerned by the proximity of the C182.

CF7. The EC equipment fitted to the C182 would not have been expected to have detected the PA28.

CF8. The EC device fitted to the PA28 had provided an alert to the presence of the C182.

CF9. The pilot of the PA28 had not visually acquired the C182.

PART C: ASSESSMENT OF CONTRIBUTORY FACTORS AND RISK

Contributory Factors:

	2025125			
CF	**Factor**	**Description**	**ECCAIRS Amplification**	**UKAB Amplification**
	Ground Elements			
	• Situational Awareness and Action			
1	Contextual	• Traffic Management Information Action	An event involving traffic management information actions	The ground element had only generic, late, no or inaccurate Situational Awareness

	Flight Elements			
	• Regulations, Processes, Procedures and Compliance			
2	Human Factors	• Use of policy/Procedures	Events involving the use of the relevant policy or procedures by flight crew	Regulations and/or procedures not complied with
	• Tactical Planning and Execution			
3	Human Factors	• Action Performed Incorrectly	Events involving flight crew performing the selected action incorrectly	Incorrect or ineffective execution
4	Human Factors	• Communications by Flight Crew with ANS	An event related to the communications between the flight crew and the air navigation service.	Pilot did not request appropriate ATS service or communicate with appropriate provider
	• Situational Awareness of the Conflicting Aircraft and Action			
5	Contextual	• Situational Awareness and Sensory Events	Events involving a flight crew's awareness and perception of situations	Pilot had no, late, inaccurate or only generic, Situational Awareness
6	Human Factors	~~• Unnecessary Action~~	~~Events involving flight crew performing an action that was not required~~	Pilot was concerned by the proximity of the other aircraft
	• Electronic Warning System Operation and Compliance			
7	Technical	• ACAS/TCAS System Failure	An event involving the system which provides information to determine aircraft position and is primarily independent of ground installations	Incompatible CWS equipment
8	Contextual	• Other warning system operation	An event involving a genuine warning from an airborne system other than TCAS.	
	• See and Avoid			
9	Human Factors	• Monitoring of Other Aircraft	Events involving flight crew not fully monitoring another aircraft	Non-sighting or effectively a non-sighting by one or both pilots

Degree of Risk: E.

Safety Barrier Assessment[7]

In assessing the effectiveness of the safety barriers associated with this incident, the Board concluded that the key factors had been that:

Ground Elements:

Situational Awareness of the Confliction and Action were assessed as **ineffective** because the Lydd controller had not had situational awareness of the presence of the C182.

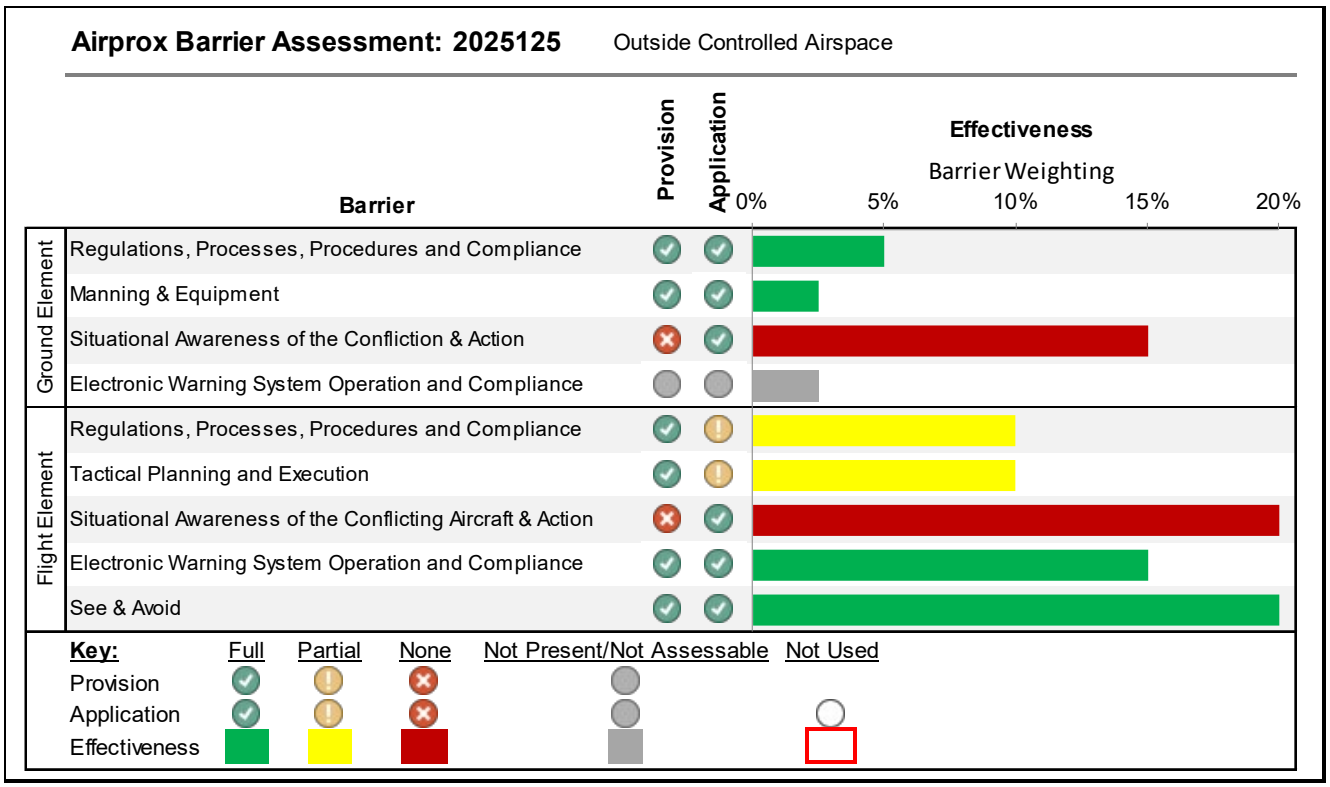
Flight Elements:

Regulations, Processes, Procedures and Compliance were assessed as **partially effective** because the pilot of the C182 had not complied with the 'Semi-circular rule' with respect to their heading and altitude under IFR.

Tactical Planning and Execution was assessed as **partially effective** because the pilot of the C182 had selected a cruising level inconsistent with the 'Semi-circular rule'.

Situational Awareness of the Conflicting Aircraft and Action were assessed as **ineffective** because the pilot of the C182 had not had situational awareness of the presence of the PA28.

[7] The UK Airprox Board scheme for assessing the Availability, Functionality and Effectiveness of safety barriers can be found on the UKAB Website.


Airprox Barrier Assessment: 2025125
Outside Controlled Airspace
Barrier
Provision
Application
Effectiveness
Barrier Weighting
0%
5%
10%
15%
20%
Ground Element
Regulations, Processes, Procedures and Compliance
Manning & Equipment
Situational Awareness of the Confliction & Action
Electronic Warning System Operation and Compliance
Flight Element
Regulations, Processes, Procedures and Compliance
Tactical Planning and Execution
Situational Awareness of the Conflicting Aircraft & Action
Electronic Warning System Operation and Compliance
See & Avoid
Key:
Full
Partial
None
Not Present/Not Assessable
Not Used
Provision
Application
Effectiveness