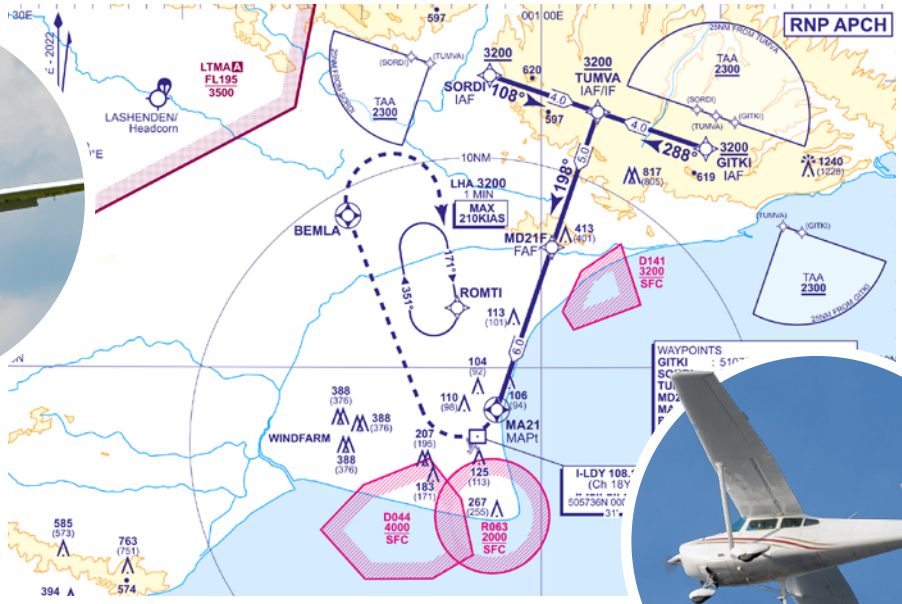
AIRPROX Insight

DIRECTOR UKAB'S MONTHLY UPDATE

November 2025



AIRPROX OF THE MONTH

Close to the edge

Instrument Approach Procedures outside controlled airspace – could they catch you unawares…?

If you think simply being clear of, but close to, instrument approach feathers is okay, you might want to think again — take this Airprox (**2025125**) which occurred about five miles east of Ashford, Kent, and about 12-13 miles north of Lydd airport.

The pilot of a PA-28 was flying an RNP approach procedure to RW21 at Lydd while a Cessna 182 was transiting the area. The Cessna pilot had reported flying under VFR, but actually without enough clearance from cloud to be considered as being in VMC (although the visibility was excellent).

Meanwhile, The PA-28 pilot was receiving a Procedural Service from Lydd Approach (there is no surveillance equipment – e.g. radar – at Lydd) and had additional electronic conspicuity (EC) equipment which picked-up the presence of the C182. The Cessna pilot wasn't receiving any kind of Air Traffic Service, but was equipped with integrated EC equipment which, apparently, did not register the PA-28's presence. Nevertheless, the pilot spotted the Piper in the cloud tops after its pilot had requested a descent from the Lydd controller to generate some vertical separation from the Cessna that had registered as being at the same altitude on its EC device. The closest point of approach between the two was recorded on radar as 0.3 miles laterally and 500ft vertically.

At this point it's worth saying that the proliferation of Required Navigation Performance (RNP) approach procedures outside controlled airspace is not just a subject for pilots flying under IFR – because they are situated in Class G airspace they can also affect pilots flying under VFR.

This is also a 'hot topic' at the Civil Aviation Authority, and regular meetings take place to understand the risk presented by some of these procedures when the activity is not 'protected' by the presence of controlled airspace.

The first thing to mention here is the PA-28 pilot's reaction to the contact on their EC device. Although no doubt driven partly by the weather conditions in which they found themselves, they analysed the information and formulated a plan to generate some separation between the aircraft before they had sighted the C182 (which they never did).

This is something that the UK Airprox Board encourages pilots to think about, but we do often see pilots relying on sighting the other aircraft before taking any action. In this case, both aircraft had been flying at the same altitude – the PA-28 pilot had little choice because that was the altitude specified for that part of the RNP procedure, but the C182 pilot was, on the face of it, free to choose their transit altitude.

This brings me to my second point – VFR flight above 3000ft amsl requires the aircraft to be at least 300m (1000ft) vertically clear of cloud; if it is not, then the aircraft is considered to be in IMC and the pilot then needs to fly under IFR.

This then brings another rule to bear – namely, (UK)SERA.5205 IFR — Rules Applicable to IFR flights outside controlled airspace. Paragraph (a) states that *'An IFR flight operating in level cruising flight outside of controlled airspace shall be flown at a cruising level appropriate to its track as specified in […], except when otherwise specified by the competent authority for flight at or below 900m (3000ft) above mean sea level.'*

In a nutshell, this means that 'the semicircular rule' applies — the pilot of an aircraft flying above 3000ft amsl and tracking from 360° to 179° should select an odd cruising level (eg, FL30, FL50, FL70 etc) and the pilot of an aircraft tracking from 180° to 359° should select an even cruising level (eg, FL40, FL60, FL80 etc).

Photos for illustrative purposes: Shutterstock - Robert Buche

Ironically, in this case had the C182 pilot selected FL40 or 4000ft as their cruising level/altitude, they would then have been at least 1000ft vertically clear of cloud and operating in VMC (and under VFR)! Nevertheless, it's noteworthy that the Cessna pilot had chosen to transit at 3200ft, the same altitude as applies to the initial portions of the RNP approach procedure at Lydd.

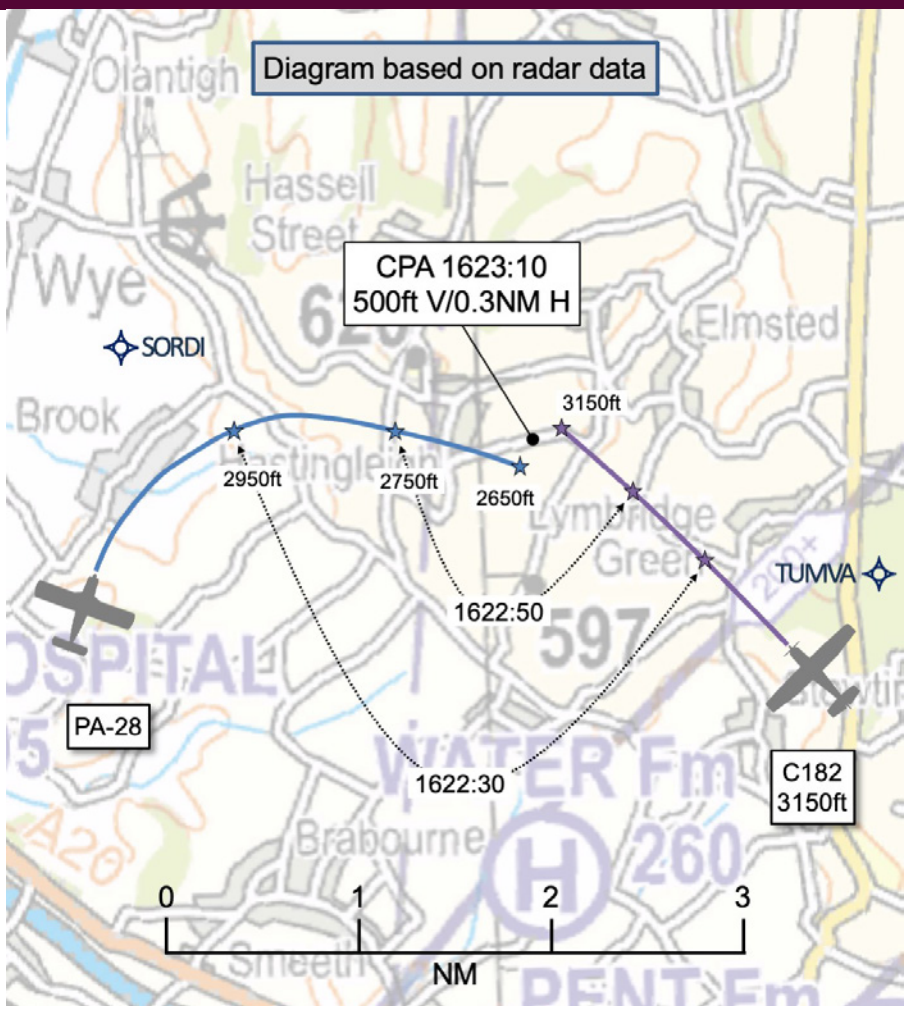
This brings me on to my third point. On CAA VFR 1:500,000 charts, those aerodromes with at least one instrument approach procedure (IAP) outside controlled airspace are marked with 'feathers'. There is also an accompanying note, stating that '*Pilots are strongly recommended to contact aerodrome ATSU before flying within 10nm of any aerodrome marked with instrument approach feathers.*'

The 'feathers' symbol only extends to about seven miles or so from the aerodrome, so it *does not* indicate the limit of the IAP. In this case, the Airprox took place about 13 miles from Lydd – beyond the recommended range.

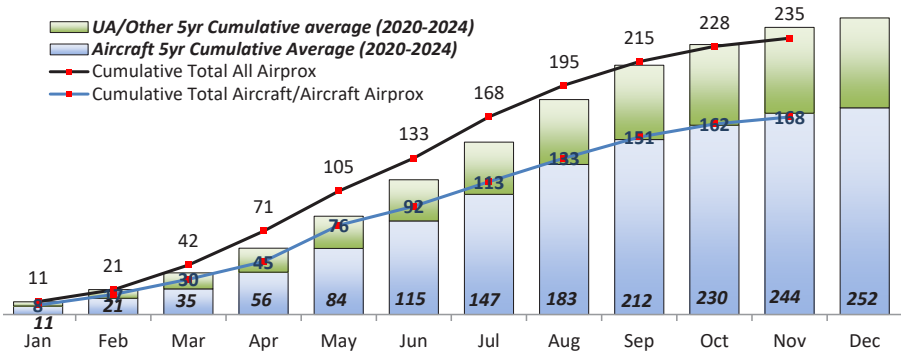
Therefore, and because there is no way of telling from the markings on the chart exactly what type of IAPs are available at any particular airfield, it would seem prudent to take the spirit of this recommendation to greater ranges – perhaps 15 miles would be a sensible figure?

It's also worth noting that, in this instance, the ATSU didn't have any access to surveillance equipment, meaning that the only way the Lydd controller could have known that the Cessna was where it was (and at the altitude it was at) would have been if its pilot had called Lydd. That's not to criticise the Cessna pilot's actions – they were not required to contact Lydd and so thought that it would be okay if they didn't.

However, and as I hope I have shown, there are some things that aren't marked on the CAA VFR charts that may need to be considered — pre-flight planning is where we should have the time and the information available to establish whether there are IAPs on our route we need to be aware of.
A simple check of the UK AIP will provide the relevant charts, which will also tell us the altitudes at which pilots on those procedures will be expected to fly.



2025 Airprox - Cumulative Distribution



BOARD SUMMARY

This month, the Board evaluated 21 Airprox, including three UA/Other events, all of which were reported by the piloted aircraft. Of the 18 full evaluations, five were classified as risk-bearing – two as category A and three as category B.

The Board made one Safety Recommendation at this month's meeting, following an Airprox between a Ventus glider and a Cessna 182 in the vicinity of Sherburn-in-Elmet airfield (**Airprox 2025126**).

The Cessna pilot was inbound to the Initial Approach Fix for the RNP approach procedure to RW28 at Sherburn when they came close to the thermalling Ventus. While this is a good news story in terms of electronic conspicuity equipment – because the Cessna's EC equipment 'saw' the glider's transponder – our investigation revealed that the procedures for the use of the RNP approach at Sherburn are a bit unclear, with different documents suggesting different requirements for the RNP approach to be used.

Suffice to say that the Board recommended that Sherburn Aero Club tidy up the entries relating to this procedure in the UK AIP and on the Sherburn Aero Club website.

The reduction in reported Airprox over the year continues, which is really encouraging. As winter approaches, and the opportunities to go flying (under VFR) become constrained by the weather, take the time to have a look back over these Insight articles and see whether there is anything you would change for the next flying season.