

Engagement Response Document: Revision of SVFR Weather Minima in the London CTRs

CAP 3147

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Glossary

AOC	Air Operator Certificate – a certificate authorising an operator to carry out specified commercial air transport operations.
Cloud Base	The lowest height of the visible portion of a cloud.
Cloud Ceiling	The height above the ground or water of the base of the lowest layer of cloud covering more than half the sky.
CTR	Control Zone – controlled airspace extending upwards from the surface of the earth to a specified upper limit.
HEMS	Helicopter Emergency Medical Services – air ambulance operations.
Met Office	UK's national weather service, providing meteorological data.
NPAS	National Police Air Service – UK police aviation operations.
Part-NCC	Non-Commercial Complex – refers to non-commercial operations of complex motor-powered aircraft under EASA regulations.

Introduction

Overview

The CAA is responsible for ensuring a safe operating environment for aviation within the UK. As part of this responsibility, we regularly review existing regulation to ensure it remains relevant and appropriate as the operating environment evolves.

The Special Visual Flight Rules (SVFR) weather minima¹ that currently apply within the London CTR and the London City CTR (the London CTRs) have been an area of focus for some time. Attention first fell upon this particular implementation of the minima as a result of the fatal helicopter accident that occurred near Vauxhall Bridge in 2013. While it is acknowledged that this accident was not directly caused by the SVFR weather minima, it was deemed appropriate and proportionate to include the SVFR weather minima in the comprehensive review of the operating environment to identify where potential improvements could be made.

The Onshore Helicopter Review² made recommendation that the London CTR Working Group review the weather minima for SVFR helicopter operations within the London CTRs with a view to establishing minima of 3km visibility and 1000ft cloud ceiling for all helicopter operations. CAA subsequently published a document³ offering proposed amendments to the SVFR weather minima criteria applicable to such operations and sought feedback from stakeholders on the proposal. The criteria we proposed were:

- Cloudbase 1000ft above ground level (agl);
- Visibility 3000m for all aircraft types;
- Applicable throughout the London CTRs.

The engagement was very successful and stakeholders provided extensive, considered and helpful feedback. This feedback has been assessed and used to refine the criteria we originally proposed. As a result, the amendment that we will be introducing will establish the following requirements:

- Cloud ceiling not less than 1000ft above ground level (agl);
- Flight visibility not less than 3000m for all aircraft types;
- To be applied within the EGR160 Restricted Area only.

¹ [SERA5010: Special VFR in Control Zones](#)

² [CAP1864: Onshore Helicopter Review Report](#)

³ [CAP3066: Revision of Special Visual Flight Rules in the London CTRs](#)

We appreciate the valuable input received from stakeholders and believe these revised amendments will enhance the safety of operations within the London CTRs, while reducing the overall impact of the changes.

How we engaged

We conducted a stakeholder engagement period from 5th December 2024 to 12th February 2025 to gather feedback on our initial proposal for amended SVFR weather minima criteria to be applied within the London CTRs. This engagement was hosted on the CAA CitizenSpace online portal and included the engagement document, [CAP3066](#), in which we detailed our proposal. We asked a number of questions via an online feedback form on CitizenSpace, which was in 3 parts:

- **Part 1: About you.** This section enabled us to understand, in broad terms, the respondents' relationship with the airspace and the applicable regulations.
- **Part 2: Your views on the proposed minima.** The four questions in this section formed the core of the engagement, allowing us to gather views and opinions on our proposal and to seek alternative suggestions from stakeholders.
- **Part 3: The impact of the proposed minima on you.** The primary objective of this section was to understand the potential impacts of our proposal. The first question (Q10) specifically sought to determine whether the impact on stakeholders would be positive or negative.
- The remaining questions (Q11-15) focused on the air navigation functions of the CAA, as outlined in Section 70⁴ of the Transport Act 2000. However, a number of stakeholders expressed concern regarding these questions, as it was felt they were designed to elicit supportive responses, even from those generally unsupportive of the change. This was not our intention; these are standard questions used by the CAA to gather feedback directly related to its air navigation functions. However, due to the negative feedback generated by these questions, the responses were not used to inform our assessment⁵.

The CitizenSpace portal received feedback response from 42 stakeholders, with an additional 6 stakeholders providing their feedback through direct email responses. The statistics and percentage responses in the tables below are based upon the 42 responses received through the CitizenSpace portal feedback form.

⁴ [Transport Act 2000](#)

⁵ The response statistics related to these questions are included at the end of this document for completeness and transparency.

Who responded

We received 42 responses to the engagement through the online survey from a variety of stakeholders, including Aerodrome/Heliport Operators, Air Traffic Control Staff, General Aviation and Helicopter Operators. The breakdown of respondents by group is shown in the following table:

Option	Total	%
Aerodrome/Heliport Operator	3	7.14
Air Traffic Control Staff	1	2.38
Commercial Aviation	3	7.14
General Aviation	16	38.10
Military	1	2.38
Training Organisation	1	2.38
Helicopter Operator	11	26.19
Other	6	14.29

While not every respondent answered all questions, a significant proportion of stakeholders⁶ engaged with the core section of questions that we considered central to this engagement, ie. those in **Part 2: Your views on the proposed minima**. These questions were central to the engagement and the majority of stakeholders also provided detailed narrative responses. These comments offered valuable insights into the rationale behind their responses and highlighted specific concerns and suggestions.

In addition to the online responses, we received a further 6 submissions via direct email. Some of these responses were presented in formats that did not align directly with structure of the online questionnaire. They are therefore not included in the statistical analysis of each question. However, their content was carefully reviewed and has been fully considered in our overall assessment and in shaping the final decision on the proposed amendments.

⁶ Q6: 95.24%; Q7: 95.24%; Q8: 83.33%; Q9: 88.10%; Q10: 95.24%

Chapter 1

Analysis of the Responses Received

- 1.1 The following sections present an analysis of the responses received to the questions in parts 2 and 3 of the feedback questionnaire hosted on the CitizenSpace portal. Part 1 is not included in this analysis, as its purpose was solely to understand who was responding and their connection to the airspace in question.
- 1.2 Each question is presented in the 'We asked, You said, We did' format, where appropriate⁷. For each question, we provide the number of responses received for each option, along with the corresponding percentage of total respondents.

Part 2: Your Views on the Proposed Minima

We asked: Q6. Proposed Minima

- 1.3 The first question in Part 2 focused on the specific weather minima we proposed for SVFR operations within the London CTRs. These proposals were outlined in [CAP3066](#), which also provided the rationale behind the suggested changes. Stakeholders were invited not only to indicate their level of agreement with the proposed minima but also to provide narrative feedback explaining the reasoning behind their responses.
- 1.4 **Question 6: CAA proposes 3000m visibility and 1000ft agl cloudbase for all aircraft types. Should the revised SVFR weather minima be as proposed by the CAA, more restrictive or less restrictive?**

You said

Option	Total	%
As proposed	15	35.71
More restrictive	3	7.14
Less restrictive	22	52.38
Not answered	2	4.76

⁷ Not all questions include a 'We did' summary.

- 1.5 Stakeholders were broadly accepting of the introduction of a cloud-related element to the SVFR weather minima; however, there was a strong preference for the use of cloud ceiling⁸ rather than cloud base as the defining measure. Stakeholders noted that using cloud ceiling would allow flights to continue when only light cloud cover, classified as FEW (1-2 oktas) or SCT (3-4 oktas), is forecast or reported in the operating area below 1000' agl, offering greater operational flexibility without compromising safety.
- 1.6 Stakeholder views were less aligned regarding the proposed visibility minima. Of the 42 respondents:
- 18 respondents (~43%) supported the CAA's proposed visibility threshold or preferred a more restrictive limit;
 - 22 respondents (~52%) favoured a less restrictive threshold than proposed;
 - and 2 respondents (~5%) chose not to answer this question.
- 1.7 Several stakeholders highlighted a potential inconsistency in the proposed weather minima. Specifically they noted that the proposed SVFR criteria could be more restrictive than the existing VFR minima for helicopters. This raised concerns of proportionality and operational impact.

We did

- 1.8 We listened to the feedback provided by stakeholders and considered how it could inform and, where appropriate, be used to improve our proposal.
- 1.9 In response to the strong preference for using cloud ceiling rather than cloud base as the defining criterion, we have decided to accept the stakeholder feedback and amended our proposal accordingly. This change recognises stakeholder input and will be consistent with other similar regulatory regulation.
- 1.10 After reviewing the feedback on visibility minima, we have decided to retain our original proposal of a 3000m visibility requirement. This criterion will apply uniformly to both helicopter and fixed-wing operations within the defined area.

We asked: Q7. Implementation Area

- 1.11 The second question in Part 2 focused on the geographical extent of the amended weather minima. We proposed that the revised criteria should apply to operations throughout the entire area covered by the London CTRs. Stakeholders were invited to indicate their preference and to provide a rationale for their response.

⁸ The height above the ground or water of the base of the lowest layer of cloud below 6 000 metres (20 000 feet) covering more than half the sky. *ICAO Annex 2 Chptr 1 Definitions*

1.12 Question 7: CAA proposes that revised weather minima should apply throughout the geographical area covered by the London and London City CTRs. Where should the revised SVFR weather minima apply?

You said

Option	Total	%
Throughout London CTRs	12	28.57
Limited area within London CTRs	12	28.57
Other	16	38.10
Not answered	2	4.76

- 1.13 Stakeholders were divided on where the amended weather minima should apply. Responses were evenly split between those who supported applicability throughout the London CTRs and those who preferred a more limited area (~29% each). Of the 12 stakeholders who supported a limited area within the London CTRs, 10 (~83%) suggested restricting the applicability to within the EGR160 Restricted Area, to Central London, to densely urban areas, or to areas with large concentrations of tall buildings.
- 1.14 A further 16 stakeholders (~38%) selected 'Other' and proposed a range of alternative approaches. These included applying the criteria throughout the UK, in all class D airspace, or across all CTRs. Some also suggested modifying the boundaries of the London CTRs to remove controlled airspace from above a number of GA airfields.
- 1.15 Within the 'Other' category, 4 (~25%) respondents also supported limiting the applicability to within the EGR160 Restricted Area or to areas with large concentrations of tall buildings, aligning with the views of those who preferred a more focused implementation.
- 1.16 A total of 6 (~14%) respondents either opposed any implementation or chose not to answer the question. Additionally, 7 (~17%) respondents used this question to express that any implementation should not apply to GA airfields, should exclude GA operators in general, or should apply only to fixed-wing aircraft operating within the London CTRs.

We did

- 1.17 We carefully considered the feedback provided by stakeholders and how it could inform and improve our proposal.
- 1.18 In light of the stakeholder suggestion that the amended SVFR weather limits should apply across all UK CTRs, we conducted an assessment of aviation chart obstacle information for 23 UK CTRs. This assessment identified that:
 - a. 16 CTRs contain 5 or fewer charted obstructions; of these, only 3 have any obstructions taller than 500 feet.
 - b. Of the remaining 7 CTRs, 3 have no obstructions over 500 feet and the obstruction density is extremely low (with 6, 8 and 11 obstructions in each CTR respectively).
 - c. The remaining 4 CTRs are Edinburgh with 11 obstructions, 4 of which are over 500 feet; Birmingham and Manchester both with 8 obstructions, 4 of which are over 500 feet; and Liverpool with 16 obstructions, 3 of which are over 500 feet.
 - d. In addition, there are no helicopter routes, similar to those used in London, that are published or known to be operated in these 23 CTRs.
- 1.19 Based on this analysis, we concluded that the overall number and density of obstructions in other CTRs across the UK is very low. Therefore, we do not consider it necessary to extend the implementation of amended weather minima beyond the London CTRs.
- 1.20 We also considered the suggestion that the CTR boundaries should be revised to remove controlled airspace above GA airfields. However, this was discounted; such an action would not achieve the aims of this review and is considered out of scope.
- 1.21 The purpose of this review was never to alter arrangements for operations at minor aerodromes referred to in [ORS4 No.1321](#). We acknowledge stakeholder concerns on this point and confirm that the amendments will not affect the operations at these airfields.
- 1.22 The objective of the review is to enhance the safety of all aircraft operations conducted within the low-level airspace of the London CTRs. As such, stakeholder responses proposing to exclude GA operations or to apply the changes only to fixed-wing aircraft were not supported.
- 1.23 We gave particular attention to stakeholder responses that suggested the amendment should apply only to areas characterised by high concentrations of tall buildings and more complex urban environments. These views aligned with the issues identified within [CAP3066](#) and a more focused implementation would

better align with the CAA's general duty to exercise its air navigation functions as defined in Transport Act 2000 Section 70⁹. Stakeholders also noted that the EGR160 Restricted Area already defines a volume of special use airspace that encompasses the majority of the most densely built-up areas within the London CTRs, including the vast majority of the concentrations of tall buildings and obstructions, particularly those clustered along the River Thames.

- 1.24 As a result of the stakeholder feedback, we have decided to revise our original proposal. The amended SVFR weather minima will now only apply within the EGR160 Restricted Area. This focused implementation better aligns with the CAA's statutory duties under section 70 of the Transport Act 2000. The criteria will apply to both helicopter and fixed-wing aircraft operating VFR/SVFR inside the EGR160 Restricted Area.

We asked: Q8. Exemptions

- 1.25 The 3rd question in Part 2 of the feedback form addressed our proposal to exempt a small number of airspace users from the amended weather minima. We consider that these airspace users operate within the London CTRs to provide services that are either potentially life-saving or are conducted in the interests of public safety or national security. Under the proposal, these airspace users would be permitted to revert to the existing weather minima for SVFR operations¹⁰, should they require.
- 1.26 **Question 8: Do you agree that certain airspace users should be exempted from the proposed minima? (Please select all that apply)**

You said

Option	HEMS	NPAS	Military	Other	Total	%
Yes	30	28	26	15	99	58.92
No	5	7	9	13	34	20.23
Not answered	7	7	7	14	35	20.83

- 1.27 Overall, ~59% of respondents supported the proposal to exempt certain airspace users from the amended SVFR weather minima. There was strong support for exemptions to apply to HEMS, NPAS and military operations. Several stakeholders also suggested that Search & Rescue (SAR) Helicopters should be

⁹ [Transport Act 2000](#)

¹⁰ [SERA.5010 Special VFR in control zones \(caa.co.uk\)](#)

added to the list of exempted operations. There was general agreement that exemptions should apply only operational flights, with training flights excluded from this provision.

- 1.28 The general theme of responses received that did not support any exemptions for certain airspace users was that weather minima should be absolute apply to all users at all times. Other suggestions included:
- Automatically exempting all helicopters;
 - Exempting all multi-pilot helicopter operations;
 - Exempting all commercial low-level airspace users, including eVTOL operators;
 - Maintaining the existing minima without any changes, thereby eliminating the need for exemptions altogether.

We did

- 1.29 We reviewed the feedback from stakeholders on the proposed exemptions and considered how it could inform and refine our approach.
- 1.30 While we acknowledge the concerns raised by those opposed to exemptions, we concluded that allowing certain airspace users to operate under the existing, less restrictive minima, when engaged in operations related to safety of life, law enforcement, public safety, or in the interests of national security, is sufficiently compelling to justify the requirement.
- 1.31 We also took into account the strong stakeholder feedback that such exemptions should be strictly limited to operational necessity and should not extend to training activities.
- 1.32 As a result, we have decided to implement an automatic exemption from the amended weather minima to certain airspace users conducting operations in the interests of public safety or national security. This includes HEMS, NPAS, military operators, and, as suggested by stakeholders, SAR helicopters. These exemptions will apply only to operational flights and will not extend to training missions.

We asked: Q9. Dispensations

- 1.33 The final question in Part 2 asked stakeholders to consider whether a mechanism should be introduced to allow AOC holders to apply for a dispensation. This would allow them, under certain conditions, to continue operating under the current weather minima, rather than the amended criteria.
- 1.34 **Question 9: Should AOC holders be able to apply for dispensation from the proposed minima?**

You said

Option	Total	%
Yes	18	42.86
No	19	45.24
Not answered	5	11.90

1.35 Responses to this question were evenly divided, with 18 (~43%) respondents supporting the introduction of a dispensation mechanism, 19 (~45%) respondents opposing its introduction and 5 (~12%) choosing not to answer the question.

1.36 Those not in favour of a dispensation mechanism raised a number of concerns:

- a. It could undermine the safety benefits gained from the introduction of the amended minima;
- b. Applying different minima to different operators could create complexity for ANSPs and heliports;
- c. It may be challenging to ensure only authorised operators use the exemption;
- d. Exemptions should be limited to those with a clear operational need;
- e. If made available, Part-NCC holders and private operators should also be eligible to apply for such exemption;
- f. A consultation should be held to define eligibility and application criteria;
- g. Some questioned whether the requirement for exemption was primarily for commercial or financial benefit, and whether that justified its introduction.

1.37 Those in favour of a dispensation mechanism included comments that echoed some of the points raised by those not supportive:

- a. If introduced, it should be inclusive of Part-NCC holders and private operators;
- b. A consultation process should determine eligibility and application criteria;
- c. AOC holders operate under strict regulatory oversight and structured safety management systems, and should receive the same consideration as HEMS and NPAS;

- d. There must be clarity on responsibility for verifying exemptions during operations;
- e. Any exemption should be limited to specific tasks and based upon operational necessity.

1.38 Additional comments were made by those who chose not to answer yes/no to the question, suggesting that:

- Exemptions could be based on operator proficiency and equipment capability;

1.39 If the existing minima were retained, no exemption mechanism would be required.

We did

1.40 After evaluating the responses, it is clear that stakeholder views on this issue are divided, with arguments presented both for and against the introduction of a dispensation mechanism. We recognise the concerns raised regarding safety, operational complexity and governance, as well as the points emphasising operational flexibility and the structured oversight under which many operators already function.

1.41 In light of these considerations, and following further internal review, the CAA intends to progress work on the development of a dispensation mechanism to support operators who may require continued use of the existing minima under defined conditions. This work will be taken forward by Flight Operations, who will establish the scope, eligibility criteria and governance arrangements necessary to ensure such a mechanism is safe, proportionate and appropriately controlled. We will engage relevant stakeholders as this work develops to ensure the process is clear, workable and aligned with operational needs.

Part 3: The Impact of the Proposed Minima on You

We asked: Q10. Overall Impact

1.42 The first question in this section invited stakeholders to share their views on the overall impact they believed the proposed weather minima amendment would have on them. This was the final question from the feedback form that we considered in reaching our decision.

1.43 **Question 10: What do you expect will be the impact, on you or your operation, of the SVFR weather minima proposed by the CAA?**

You said

Option	Total	%
Positive impact	4	9.52
Negative impact	22	52.38
Neutral or No impact	14	33.33
Not answered	2	4.76

- 1.44 The responses to this open question were exactly as we had hoped, with stakeholders providing thoughtful and detailed insights into whether they believed the proposed amendment would have a positive, negative, or neutral impact, along with the reasoning behind their views.
- 1.45 Some stakeholders expressed concerns of a negative impact, citing a belief that ATC would be responsible for assessing weather conditions. We would like to clarify and confirm that, as stated in the engagement document, weather assessment remains the responsibility of the pilot, in line with established aviation practice.
- 1.46 A number of stakeholders highlighted that a broader application of the amended weather criteria across the entire London CTRs, as we originally proposed, would have a negative impact. This feedback, among other factors, contributed to our decision to limit the implementation to the EGR160 Restricted Area.
- 1.47 A number of responses also raised concerns about the financial implications of the proposed changes. Some stakeholders felt that safety improvements should not come at the expense of economic growth, or commercial viability, particularly for operators already facing a challenging financial situation.
- 1.48 Stakeholders who viewed the impact as either positive or neutral were often those already operating using similar weather minima to that proposed by the CAA. Others noted potential benefits such as a reduction in workload and the introduction of a clearer set of criteria to communicate to customers.

We did

- 1.49 We acknowledge that 22 (~52%) respondents indicated the proposed amendment would have a negative impact. However, it is important to note that 7 (~17%) of these responses were based on either the assumption that the amendment would apply across the entire London CTRs, or the incorrect belief that weather assessment responsibilities would shift from pilots to air traffic

control. As clarified in the engagement document, weather assessment remains the responsibility of the pilot, consistent with current aviation practice.

- 1.50 We recognise that the revised weather minima may restrict more frequently than the current criteria. To better understand the potential operational impact, we analysed Met Office data from London Heathrow and London City airports over a 5-year period (2020-2024). This data looked at hourly visibility and cloud ceiling conditions to establish how often operations would have been affected under two sets of operating minima:
- a. Visibility less than 1500m or Cloud Base below 1000 ft agl;
 - b. Visibility less than 3000m or Cloud Base below 1000 ft agl.
- 1.51 At London City, the average annual percentage of hours when conditions fell below the first threshold was 8.1%, increasing slightly to 8.5% under the second, more restrictive threshold.
- 1.52 At London Heathrow, the figures were 11.0% and 11.6% respectively.
- 1.53 These results suggest that the proposed increase in weather minima would result in only a modest increase in operational limitations. Moreover, this data is based upon airport observations and may not fully reflect in-flight conditions, a point raised by a number of stakeholders who emphasised the importance of keeping weather decisions in the cockpit, a view with which we agree entirely.
- 1.54 Taking into account both the stakeholder feedback and the Met Office data, we have decided to proceed with a change to the weather minima. However, we have revised the criteria from our original proposal in response to the concerns raised.
- 1.55 The amendment will now apply only within the EGR160 Restricted Area, which we believe will minimise the impact on a number of stakeholders. We will retain the proposed visibility minima of 3000m, but will adopt a cloud ceiling minima of 1000' agl, rather than cloud base criteria, in line with stakeholder preferences.

Chapter 2

Remaining Questions from Part 3

- 2.1 The remaining questions in this Part 3 were standardised questions used by the CAA to gather feedback specifically related to its air navigation functions, as outlined in the Transport Act 2000. However, their inclusion in this engagement raised concerns and objections among stakeholders. Many felt that the questions were designed to elicit responses seemingly supportive of the CAA proposal, even from those who were opposed to any changes to the weather minima.
- 2.2 In light of this feedback, we are providing the statistical results from these questions for transparency-only. These responses were not used to inform the CAA's decision-making process regarding the proposed amendment.

We asked: Q11. Safety

- 2.3 **Question 11: Safety. What impact do you expect the proposed SVFR weather minima will have on civil aviation safety in the London CTRs?**

You said

Option	Total	%
Positive impact	15	35.71
Negative impact	7	16.67
Neutral or No impact	16	38.10
Not Answered	4	9.52

We asked: Q12. Efficiency

- 2.4 **Question 12: Efficiency. What do you expect the impact of the proposal will be on the efficiency of Air Traffic Management in the London CTRs?**

You said

Option	Total	%
Positive impact	7	16.67

Option	Total	%
Negative impact	12	28.57
Neutral or No impact	17	40.48
Not Answered	6	14.29

We asked: Q13. Environment

2.5 **Question 13: Environment. What impact do you expect the proposal will have on the environment (for example, increased fuel burn, increased CO2 emissions)?**

You said

Option	Total	%
Positive impact	5	11.90
Negative impact	10	23.81
Neutral or No impact	24	57.14
Not Answered	3	7.14

We asked: Q14. Security

2.6 **Question 14: Security. What impact do you expect the proposal will have on civil aviation security?**

You said

Option	Total	%
Positive impact	6	14.29
Negative impact	2	4.76
Neutral or No impact	29	69.05

Option	Total	%
Not Answered	5	11.90

We asked: Q15. Finance

2.7 **Question 15: Finance. What do you expect will be the financial impact of the proposal on you or your operation?**

You said

Option	Total	%
Positive impact	2	4.76
Negative impact	17	40.48
Neutral or No impact	20	47.62
Not Answered	3	7.14

Chapter 3

Next Steps

The CAA has now completed its review of stakeholder feedback and has reached a decision on the revised SVFR weather minima to be applied within the EGR160 Restricted Area.

The next stage of the project is to prepare for implementation of the amended requirements. This will include:

- Progressing the required amendment to the Statutory Instrument associated with EGR160;
- Working with relevant Air Navigation Service Providers and aerodrome operators to identify and agree any necessary amendments to local procedures;
- Developing and coordinating amendments to the UK Aeronautical Information Publication (AIP);
- Considering the development of a potential dispensation mechanism, as outlined earlier in this document.

Subject to completion of these activities, the CAA is currently targeting implementation through **AIRAC 12/2026**, with an AIS submission date of **28 August 2026** and an AIRAC effective date of **26 November 2026**.