

Informing development of the new UK Rules of the Air Regulations

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Chapter 1

Purpose of the engagement

Why are we seeking feedback?

- 1.1 The CAA is developing a new UK Rules of the Air Regulations which brings together the existing provisions contained within the Rules of the Air Regulations 2015 and Assimilated Regulation (EU) No 923/2012 Standardised European Rules of the Air (SERA).
- 1.2 As part of this work, it is necessary to consider how these two frameworks are brought together into a single, coherent set of rules. This includes ensuring that provisions from both frameworks are appropriately incorporated, while identifying and addressing areas of overlap or difference.
- 1.3 The consolidation of the UK Rules of the Air raises questions about terminology, the structure of the future framework and whether certain requirements currently contained within SERA are located in the most appropriate part of the regulatory framework. It also provides an opportunity to consider how long-standing permissions and exemptions should be reflected within the consolidated ruleset and how differences between the existing frameworks should be addressed.
- 1.4 This includes consideration of long-established permissions that have enabled certain operations to continue under UK SERA, such as the permission contained in [ORS4 No 1496](#) paragraph 5 that permits day visual flight rules (VFR) flight below 500 ft above ground level (agl). The CAA must understand how such permissions are used in practice, the role they play in supporting current operations and how they should be incorporated into the future framework.
- 1.5 Similarly, there are areas where definitions differ between the two frameworks, including the definition of 'night' within the Air Navigation Order (ANO) 2016 and UK SERA. A single definition is required to ensure rules relating to day and night are applied consistently across the UK. Understanding how these differences are experienced in practice and whether they give rise to any operational implications will support the CAA in considering a single definition of 'night' for the UK to adopt going forward.
- 1.6 The purpose of this engagement is therefore to gather insight and opinion from stakeholders on how the rulesets should be brought together, the use of the day VFR below 500 ft agl permission and the practical application of differing definitions of night. This input will support the CAA in considering what options to take forward to a future, formal consultation on a consolidated UK Rules of the Air.

Why now?

- 1.7 The development of a consolidated UK Rules of the Air provides an opportunity to review how existing provisions, permissions and definitions are carried forward. This includes ensuring that areas of difference between current frameworks are properly understood and that the impact of any changes is considered.
- 1.8 This engagement is intended to inform the development of proposals for a future formal consultation on the UK Rules of the Air. It provides an opportunity for stakeholders to share their views and shape the CAA's development of policy proposals before they are finalised.

Conduct of the engagement

- 1.9 The engagement will be open for 4 weeks from 24 August 2026 to 21 September 2026.
- 1.10 The engagement will be administered via the CAA consultation portal and anybody who has access to the link sent out in conjunction with this document will be able to respond during the engagement period.

Conclusion of the engagement

- 1.11 Once the engagement has ended, we will consider the responses and then publish an engagement response document detailing the CAA's proposed next steps.

Chapter 2

Engagement on UK Rules of the Air consolidation

Issue

- 2.1 The CAA is proposing to adopt the existing SERA format and structure seen in the Annex to UK Reg (EU) 923/2012 as the basis for a consolidated UK Rules of the Air. This would mean retaining the current numbering convention and the use of the rule, means of compliance and guidance material format. The provisions currently contained within the Rules of the Air Regulations 2015 will be incorporated into this structure as additional rules, creating a single, coherent framework.
- 2.2 Retaining the SERA structure provides continuity and is considered the simplest approach for usability by the target audience. However, SERA was retained in UK law at the point of EU Exit and has since diverged from the version now in force within the European Union. Despite now containing different requirements, both frameworks continue to use the same name and rule references, creating the potential for confusion between the two rulesets. To ensure a clear distinction, a new name for the UK framework is required, such as 'UK Rules of the Air (UKRA)', 'Rules of the Air (ROTA)' or 'RULE', i.e. SERA.1001 would become UKRA.1001, ROTA.1001 or RULE.1001.
- 2.3 The consolidation provides an opportunity to review how requirements relating to air traffic service (ATS) providers are expressed within the Rules of the Air, to ensure they are directed at the appropriate audience. This includes considering whether such provisions should describe what pilots can expect, rather than including obligations that are more appropriately placed elsewhere within the regulatory framework. The CAA's view is that requirements specific to ATS providers should be contained within the appropriate ATS ruleset, with the Rules of the Air instead describing the actions an ATS provider will take. This will involve reframing existing provisions, for example by informing pilots of what an ATS provider will do, rather than placing obligations on the provider using "shall".
- 2.4 Section 14 of UK SERA contains the requirements for voice communication procedures and, within Appendix 1 to AMC1 SERA.14001, an extensive table of standardised radiotelephony phraseologies. The UK also promulgates these procedures and phraseologies within the Radiotelephony Manual (CAP 413). The presence of this material in multiple sources creates the potential for inconsistency and may lead to ambiguity as to which should be applied. With the development of the new UK Rules of the Air Regulations, there is an opportunity to consider where this content is best placed. The CAA's view is that requirements for voice communication procedures should remain within the UK

Rules of the Air Regulations, with the table of standardised phraseology (i.e. Appendix 1 to AMC1 SERA.14001) incorporated within CAP 413, thus providing a single, authoritative source for phraseology to simplify and streamline the overall framework.

Scope

- 2.5 This portion of the engagement gathers stakeholder views on broader considerations relating to the consolidation of the UK Rules of the Air and the placement of certain requirements.

Request for feedback

- 2.6 For ease of reference for stakeholders, the questions are included in [Annex A](#).

CAA focal point

- 2.7 Stakeholders seeking clarification on this element of the engagement should contact Airspace & ATM Policy via email with the subject header 'Engagement on the UK Rules of the Air consolidation' at ats.enquiries@caa.co.uk.

Chapter 3

Engagement on flight below 500 feet

Issue

- 3.1 The current UK Rules of the Air framework contains a permission that enables certain flights to be conducted below 500 ft in circumstances that would otherwise be prohibited by UK SERA. As part of developing a consolidated UK Rules of the Air, the CAA wishes to better understand how this permission is used in practice and the role it plays in supporting current operations.
- 3.2 Under UK SERA, a minimum height of 500 ft above the surface applies, except when necessary for take-off or landing, which reflects the Standard contained in International Civil Aviation Organization (ICAO) Annex 2 – Rules of the Air. However, to preserve long-standing UK practice which existed prior to the implementation of SERA, the CAA granted a permission allowing day VFR flight below 500 ft above ground level (agl) outside congested areas provided that the aircraft is not flown closer than 500 ft to any person, vessel, vehicle or structure¹.
- 3.3 [SERA 5005\(f\)](#)² states:
- ‘(f) Except when necessary for take-off or landing [...] a VFR flight shall not be flown:
- (1) over the congested areas of cities, towns or settlements or over an open-air assembly of persons at a height less than 300 m (1000 ft) above the highest obstacle within a radius of 600 m from the aircraft;
- (2) elsewhere than as specified in (1), at a height less than 150 m (500 ft) above the ground or water, or 150 m (500 ft) above the highest obstacle within a radius of 150 m (500 ft) from the aircraft.’
- 3.4 ORS 4 No. 1496 paragraph 5 states:
- ‘5) General (SERA.5005(f)(2)) – Day VFR Flights
- a) Except when being flown over the congested areas of cities, towns or settlements or over an open-air assembly of persons, or in a Flying Display, Private Flying Display, aircraft race or contest, The Civil Aviation Authority (CAA) permits, under SERA.5005(f), an aircraft conducting day VFR flight, to be flown at a height of:

¹ This permission is contained within ORS4 No. 1496 paragraph 5.

² Transposed from ICAO Annex 2 paragraph 4.6.

- i) less than 500 ft above the ground or water; or
- ii) less than 500 ft above the highest obstacle within a radius of 150 m from the aircraft, subject to the condition in subparagraph (b).
- b) The aircraft must not be flown closer than 500 ft to any person, vessel, vehicle or structure except with the permission of the CAA.
- c) In subparagraph a):
 - i) “Flying Display” has the same meaning as in Schedule 1 of the Order; and
 - ii) “Private Flying Display” has the same meaning as in CAP 403.’

- 3.5 This permission is not confined to a specific type of operation, aircraft category or geographical area. Instead, it is applied across a range of civil flying activities and operating contexts, depending on operational need and pilot judgement.
- 3.6 While the CAA has a broad understanding of how this permission is used, much of the risk management relies on pilot-applied mitigations, situational awareness and operational practices that are not readily captured through existing data sources. This makes it more difficult to form a complete picture of how mid-air collision risk is managed in this part of the airspace.
- 3.7 At the same time, the operating environment continues to evolve, particularly in the airspace below 500 ft where there is an increasing mix of activity. ICAO expects states to recognise and understand how such changes affect their aviation system. This engagement supports that expectation by building a clearer and more current evidence base.
- 3.8 In developing a consolidated set of UK Rules of the Air, it is therefore important to better understand how the permission is used in practice and how it supports current operations. This includes identifying the circumstances in which it is relied upon and the mitigations applied by pilots when utilising this permission.

Scope

- 3.9 This engagement is limited to gathering information on the use of the day VFR below 500 ft permission and the operational practices associated with it. It seeks to understand how frequently the permission is used, the contexts in which it is applied and how pilots manage the risk of mid-air collision when operating below 500 ft.
- 3.10 We are not seeking information on other permissions contained within ORS4 No. 1496, including those relating to activities such as glider hill-soaring, practice approaches, manoeuvring helicopters or other defined exceptions.

Request for feedback

- 3.11 For ease of reference for stakeholders, the questions are included in [Annex B](#).

CAA focal point

- 3.12 Stakeholders seeking clarification on this element of the engagement should contact Flight Operations Policy via email with the subject header 'Engagement on day VFR flight below 500 ft agl' at FlightOpsPolicy@caa.co.uk.

Chapter 4

Engagement on the definition of night

Issue

- 4.1 The current UK regulatory framework contains more than one definition of 'night'.
- 4.2 ANO 2016 Schedule 1 states:
- “Night” means the time from half an hour after sunset until half an hour before sunrise (both times inclusive), sunset and sunrise being determined at surface level;**
- 4.3 SERA Article 2(97) states:
- ‘night’ means the hours between the end of evening civil twilight and the beginning of morning civil twilight. Civil twilight ends in the evening when the centre of the sun’s disc is 6 degrees below the horizon and begins in the morning when the centre of the sun’s disc is 6 degrees below the horizon;**
- 4.4 The SERA definition of 'night' reflects the ICAO Annex 6 standard and is widely used across other States. The existence of a different definition within the UK framework therefore introduces a divergence from common international practice.
- 4.5 These definitions are both currently in force and apply in different regulatory contexts. As a result, different definitions of 'night' may be applied by pilots and air navigation service providers, depending on the activity being conducted. The definition of 'night' underpins operational requirements including the application of VFR minima, air traffic service procedures and the conditions under which pilots may operate. The lack of a single definition creates a risk of inconsistent application of these requirements.
- 4.6 When applied in practice, the two definitions result in different timings for the start and end of 'night' and this difference varies depending on latitude and time of year. The ANO definition is based on a fixed offset from sunset and sunrise, whereas the SERA definition reflects changing light conditions. As a result, the ANO definition produces a longer period classified as 'night' than the SERA definition. This difference is typically small in the south of the UK and during winter but can become more pronounced at higher latitudes and during the summer months.
- 4.7 The UK intends to adopt a single definition. This engagement seeks to understand the potential impacts associated with each option.

Scope

- 4.8 This engagement gathers information on the practical application of the current definitions of 'night' and the potential impacts of adopting a single definition for use across the UK. It seeks to understand how each option is used in practice, how easily it can be applied and any operational, training or system-related considerations associated with its use.

Request for feedback

- 4.9 For ease of reference for stakeholders, a list of the questions is also included in [Annex C](#).

CAA focal point

- 4.10 Stakeholders seeking clarification on this element of the engagement should contact Airspace & ATM Policy via email with the subject header 'Engagement on the definition of night' at ats.enquiries@caa.co.uk.

ANNEX A

Engagement on UK Rules of the Air consolidation

List of questions

- Do you support retaining the existing SERA numbering, format and structure as the basis for a consolidated UK Rules of the Air, with rules from the Rules of the Air Regulations 2015 incorporated as additional provisions?
 - Yes.
 - No.
 - No preference
- *If you selected no*, please explain your answer.
If you selected yes or no preference, you may optionally provide any additional comments.
- In replacing 'SERA' before the number of a rule (for example, SERA.3205) what term do you consider most appropriate in the new consolidated UK Rules of the Air Regulations?
 - UKRA.
 - ROTA.
 - RULE.
 - Other (please specify).
- *Optional*. Explain your answer.
- Where appropriate, the CAA intends to contain requirements placed upon ATS providers within a revised ruleset for ATS. In doing so, we intend to reframe the ATS related content in the Rules of the Air as guidance material so that it informs pilots about how ATS will be provided to them.
As an example, SERA.7002(a) could be rewritten in a way that informs pilots of what will happen, rather than to direct an action for ATS:
“When an identified controlled flight is observed to be on a conflicting path with an unknown aircraft, deemed to constitute a collision hazard, the pilot of the controlled flight ~~shall~~ will, whenever practicable [...].”
Do you support this approach?
 - Yes.
 - No.

- No preference
- *Optional.* Explain your answer.
- The CAA proposes that Appendix 1 to AMC1 SERA.14001 should be removed from the Rules of the Air and incorporated into CAP413 as the single, authoritative source.
Do you support this approach?
 - Yes.
 - No.
 - No preference
- *Optional.* Explain your answer.

ANNEX B

Day VFR flight below 500 ft agl engagement

List of questions

Use of the permission

Note: The questions below relate only to the general permission for day VFR flight below 500 ft. They do not relate to other specific permissions contained within ORS4 No. 1496, such as those for glider hill-soaring, practice approaches, manoeuvring helicopters etc.

- How frequently do you undertake day VFR flight at less than 500 ft above the ground or water; or less than 500 ft above the highest obstacle within a radius of 150 m from the aircraft? Daily, weekly, monthly or less frequently?
- In what types of flying operation do you make use of the permission to fly below 500 ft in day VFR?
Examples include: specialised operations, private and/or commercial flying training and recreational flying.
- Which aircraft categories or types do you typically operate during these flights?
- What factors typically lead you to operate below 500 ft (e.g., mission requirements, aircraft performance, environmental conditions)?
- When using the permission, is your time below 500 ft typically transient or sustained, and what factors influence this?

Operational practices and mitigations

- What operational practices, procedures or mitigations do you routinely apply when flying below 500 ft?
- What pilot training, experience, or currency requirements do you consider important for safe day VFR operations below 500 ft?
- Are there any organisational policies you follow when conducting flight below 500 ft agl?
- What measures do you use to maintain terrain/obstacle awareness and lookout when operating below 500 ft agl? If these differ from the measures you would typically apply when operating at higher levels, please explain how and why.
- Do you adjust aircraft speed when operating below 500 ft and, if so, what factors influence your chosen speed?

Interaction with other airspace users

- How do you maintain situational awareness of other aircraft when flying below 500 ft?
- Have you experienced any operational challenges or notable interactions with other airspace users in this environment?
- What information, services or tools do you use to support your situational awareness below 500 ft agl?

Safety performance

- What factors, challenges or conditions affecting safety or situational awareness do you experience when operating below 500 ft?
- Are there any additional mitigations, information sources or tools that you believe could improve safety of operations below 500 ft?

Future considerations

- Are there particular types of operation that you consider especially dependent on continued access to airspace below 500 ft?
- Do you foresee any future changes that may affect how you operate below 500 ft? Consider technological developments, airspace usage patterns or emerging industry practices.
- Are there any operational or environmental changes that, in your view, would warrant further consideration or monitoring in relation to operations below 500 ft?

ANNEX C

Definition of night engagement

List of questions

- Which definition of night should be retained and consistently applied in aviation across the UK?
 - ANO definition (sunrise/sunset ± 30 minutes)
 - SERA/ICAO definition (civil twilight)
 - No preference
- If you have stated a preference, explain your answer.
- What, if any, operational, financial or system impacts would retaining the ANO definition have on your activities?
- What, if any, operational, financial or system impacts would retaining the SERA/ICAO definition have on your activities?
- Where do you currently obtain information on the timings of civil twilight, sunrise and sunset?
- What implementation period would you require to make any changes necessary following the adoption of a single definition of 'night'?
 - Less than 3 months
 - 3-6 months
 - 6-12 months
 - More than 12 months
 - Not sure

Please explain your answer, including any factors that would influence the length of time required.