

DRONES & NEW NO-FLY ZONES AROUND AIRPORTS: DEVISING A MODERN LOCAL DRONE & SMALL UNMANNED AIRCRAFT POLICY

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Cabinet Portfolio(s)	Leader of the Council
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Papers with report	Appendix 1 - Draft policy on Drones and Small Unmanned Aircraft Appendix 2 - Draft Public Space Protection Order for consultation

HEADLINES

Summary	<p>This report updates Cabinet on the latest national drone rules and importantly the recently expanded flight restriction zones and their significance for Hillingdon.</p> <p>The report proposes to modernise the Council's relevant Public Space Protection Order for statutory consultation, alongside stakeholder consultation on a new robust local Drone Policy, primarily where it relates to drone use on Council land.</p>
Putting our Residents First	<p>This report supports the following Council objectives of: <i>Our People; Our Built Environment; Our Natural Environment</i></p>
Financial Cost	<p>There are no direct costs associated with consultation on a new policy or Public Space Protection Orders. The requirement for new signs in parks and open spaces will be met within existing budgets. A new fee is proposed in relation to exceptional film use.</p>
Relevant Policy Overview Committee	<p>Corporate Services, Commerce & Communities Residents, Education & Environmental Services</p>
Relevant Ward(s)	All Wards

RECOMMENDATIONS

That Cabinet:

1. **Note the new flight restriction zones that came into effect on 13 March 2019 prohibiting any drone use around airports and most of the Borough, and agree with the importance for the Council to have a modern, robust drone policy and local laws to complement and supplement national regulations;**
2. **Agree that the draft policy on Drones and Small Unmanned Aircraft as set out in Appendix 1 be subject to a 6 week period of key stakeholder consultation;**
3. **Note the associated changes to modernise the Council's Public Space Protection Orders in relation to Drones as set out in Appendix 2 and authorise the Deputy Chief Executive and Corporate Director of Residents Services, in consultation with the Leader of the Council, to undertake the necessary statutory consultation required before changes can lawfully be made to the existing Public Space Protection Orders and to then decide whether to give effect to the proposed changes, having conscientious regard to the consultation responses and also determining whether the statutory test required to make these changes is fully satisfied and;**
4. **Subject to the outcome of the stakeholder consultation and statutory process above, delegate authority to the Leader of the Council, in consultation with the Deputy Chief Executive and Corporate Director of Residents Services, to formally approve the Council's Policy on Drones and Small Unmanned Aircraft and to make any further decisions required in respect of its implementation and review in light of future local and national legislative changes.**

Reasons for recommendation

To update the Cabinet on national drone policy and the new flight restriction zones around airports and their implications for Hillingdon. It is proposed to modernise the Council's relevant Public Space Protection Order for statutory consultation, alongside stakeholder consultation of a new local Drone Policy, particularly where it relates to drones on Council owned land. Specific to Hillingdon, there is a large breadth of airspace, air traffic volume and lower flying altitudes across the Borough, primarily around Heathrow Airport. Therefore, this requires the Council to robustly review its local policies and laws to ensure they adequately align, supplement and evolve with those at national level.

Alternative options considered / risk management

Options are limited considering that approximately 74% of the Borough is now under the new national drone restriction zones around airports which prohibit any personal, recreational or commercial drone or model aircraft activity without airport permission. However, outside these zones on its own land, Cabinet could soften restrictions further than those proposed in this report. This could range from full recreational permission to fly any drone within CAA guidelines in Council parks and open spaces through to designating specific land exclusively for drone flying outside the flight restricted zones, as has been done in a small number of local authority areas.

However, the looser the restrictions that the Council applies, the higher the risk of an incident involving a drone.

The proposed policy in this report sets out a robust approach combining the absolute importance of public safety around nearby airports, with a general prohibition of drones on council land, except where it is explicitly justified and in the best interests of residents.

Policy Overview Committee comments

None at this stage.

SUPPORTING INFORMATION

BACKGROUND

Over the last few years, there has been a significant increase in the use of drones for both recreational and commercial use, due to popularity, their application (e.g. to film), availability and affordability. Drone usage and growth is more clustered in the South East of England and the UK is leading much innovation in this technology.

HM Government's drone policy has evolved in recent years to catch-up to this. However, more recent changes to legislation were precipitated by drone sightings at Heathrow and Gatwick Airports in December 2018 and January 2019 which caused major travel disruption, safety concerns and national reaction. The sightings at Gatwick currently remain unresolved by Police.

Looking to the future, a PricewaterhouseCoopers market study in 2018 forecasted that by the year 2030 there could be 72,000 commercial drones in the sky, with a third of them used by the public sector primarily for safety related activities.

Whilst there are benefits from the use of drones, given the breadth of airspace, air traffic volume and lower flying altitudes across large parts of the Borough, there is a higher possibility of an aircraft incident involving a drone impacting Hillingdon than other areas of the UK. Therefore, there is an imperative for the Council to review its local policies and laws in place in order to supplement those at national level.

What are drones?

Recreational and commercial drones are also commonly technically referred to as:

- Small Unmanned Aircraft (SUA)
- Unmanned Aerial Vehicles (UAV)
- Unmanned aircraft systems (UAS)
- Quadcopters / model aircraft

Small Unmanned Aircraft (SUA) will be the formal terminology the Council intends to use in any policies or local laws in relation to drones. This terminology is currently used by the Civil Aviation

Authority, the body responsible for regulating drone use nationally. Such terminology also encompasses model aircraft. It excludes any military use of drones.

Current drone issues specific to Hillingdon

Whilst the Borough is not alone in the popularity and rise of drones, there are specific issues of relevance to Hillingdon, which include:

- Hillingdon has the UK's largest airport, Heathrow, and also RAF Northolt within the Borough boundary and a third, Denham Aerodrome that has overlapping airspace. Cabinet should note that in 2018 there were 100 near misses between drones and aircraft reported across the UK.
- In relation to Heathrow and Gatwick Airports in 2018/2019, a Hillingdon resident was prosecuted for flying a model aircraft near Heathrow on Christmas Eve (though it has been publicly stated that he was not connected to any local model flying club).
- Concern about recreational use and voyeurism using drones in the Borough over Council land, particularly Ruislip Lido;
- Ad hoc requests from the public wishing to fly drones over certain Council land for testing or filming;
- Requests for commercial drone filming on Council land, which is undertaken usually via the London Film Office (Film London);

In terms of current local laws, if drones are used in public spaces, these currently comprise of Public Space Protection Orders, where authorised Council officers have the power to issue a Fixed Penalty Notice of £100 (and up to £1000 on failure to pay) based on the following existing prohibitions below:

"v. Using powered vehicles [other than on a highway or road] such as motorcycles without the express consent of the Council."

"vi. Using remote controlled model vehicles and aircraft that is likely to cause nuisance from noise or cause harassment, alarm or distress to another person, without the express consent of the Council".

Legal advice is that neither of the above clauses now fully cover the correct modern terminology for drones, particularly if the Council were to successfully prosecute for a breach of them in Court. Therefore, current PSPOs will need amending with new terminology.

NEW FLIGHT RESTRICTION / 'NO-FLY' ZONES

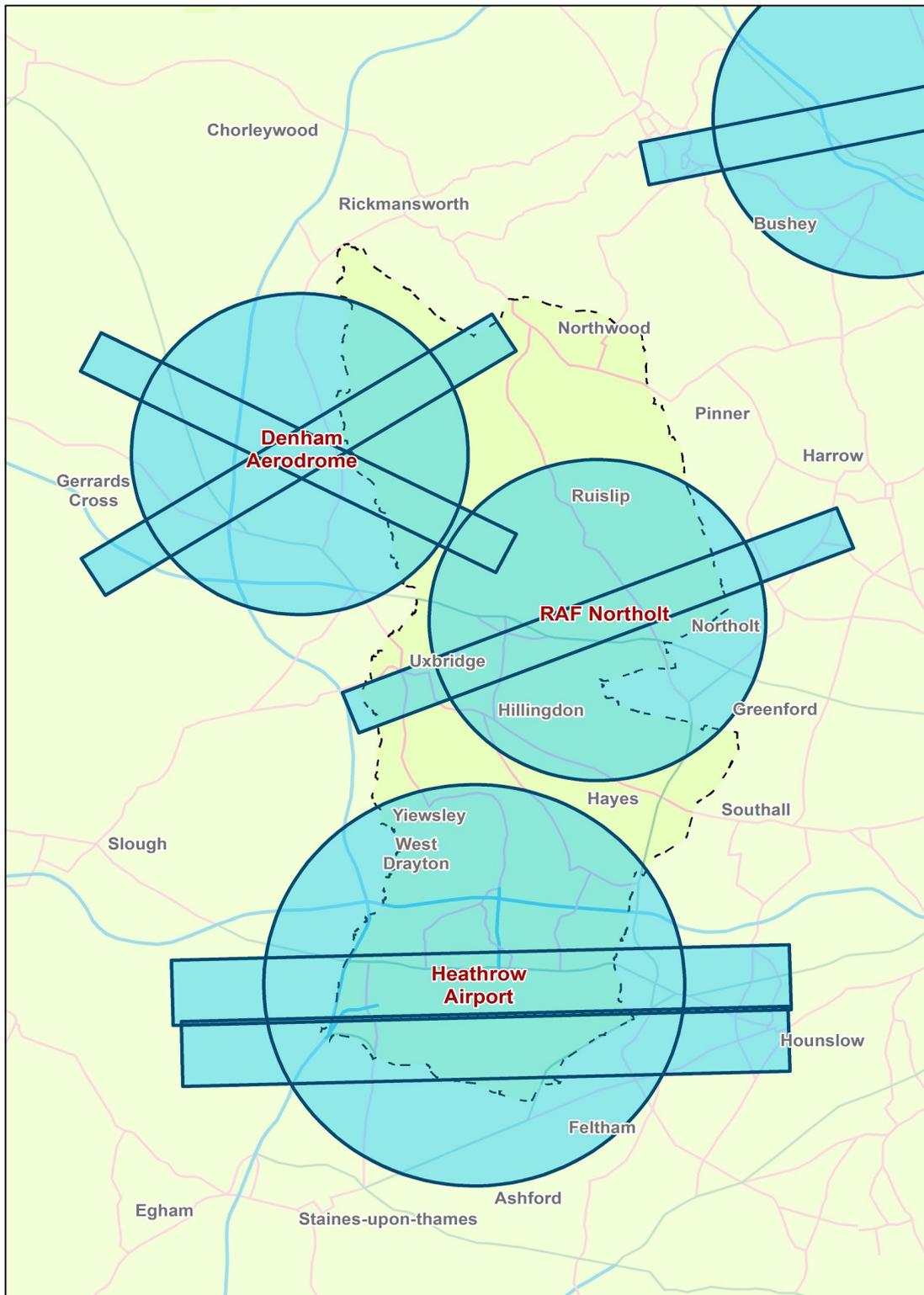
In February 2019, the UK Government published an amendment to the UK Air Navigation Order 2016 which contained its changes to the regulations regarding the operation of drones or "small unmanned aircraft" around airports.

On 13 March 2019, this Order came into effect and provided for extended "no-fly" zones (**Flight Restriction Zones or FRZ**) around all airports. It is now illegal to fly any drone within 5km of an airport, with major penalties for those who put lives at risk and break the law. For the first time,

these no-fly zones have also been extended along runways for aircraft arriving and departing airports as a further safety measure. These are called **Runway Protection Zones (RPZ)**.

This amended Air Navigation Order means that both zones are active at all times and apply to all small unmanned aircraft of any mass and even very small 'toys'. To fly any small unmanned aircraft in these zones will require explicit permission from Air Traffic Control or the Airport itself. For Hillingdon, there are three flight restricted airspace zones within and that span the Borough's boundaries: **(1) Heathrow Airport, (2) RAF Northolt & (3) Denham Aerodrome.**

These zones (FRZs in circles and RPZs in long rectangles) are shown on the map overleaf:



Map contains OS data © Crown copyright and database right (2019)

EFFECT OF NEW 'NO-FLY' ZONES ACROSS HILLINGDON

This zero tolerance of any drone activity within flight restriction zones is significant for Hillingdon. A substantial part of the Borough (approximately 74%) is now covered through the amended Air Navigation Order on 13 March 2019 making any drone use illegal.

However, whilst geographically smaller (26%), still, yet significant areas of the Borough are now **outside** these new zones and this includes much of Uxbridge, Cowley, Colham Green, parts of Hayes Town, Minet Park, Northwood, Northwood Hills and Ruislip Lido and Woods.

For viewing particular electoral wards affected (or otherwise) by the expanded flight restriction zones please refer to the [map here](#).

The Department for Transport has written to airports and local authorities asking them to publicise the new flight restriction zones and to help to educate passengers and the public about responsible drone use. This includes the website <https://dronesafe.uk> which includes maps, like the one in this report, detailing the new zones around each individual airport or airfield.

Whilst the number owned and type of use of drones by residents and organisations in these restricted zones is unknown, it is likely that many will be unaware of these national changes and the Council will assist in promoting this in its local communications.

Model flying clubs

More locally, the Council has been in contact with the known local model aircraft clubs (as model aircraft are also considered drones under the Air Navigation Order). These are:

- The Hayes and District Model Aero Club who use Cranford Country Park and;
- The Little Harlington Model Flying Club on the Little Harlington Playing Fields, Sipson.

Cabinet will wish to be aware that both clubs are located within the expanded Heathrow flight restriction zone and have previously used these fields over a number of years. These clubs are affiliated with the British Model Flying Association. If these clubs intend for their hobby to thrive locally, then by law they will require Heathrow Air Traffic Control special dispensation.

At the time of writing this report, the Council has received confirmation that the Hayes and District Model Aero Club, who have used Cranford Country Park for many years, have recently received interim permission for its club members to continue flying at Cranford from the Airfield Compliance Manager at Heathrow, with full permission expected in due course. This follows the CAA guidance issued to airport operators in April, where they may wish to establish a standing agreement with local model aircraft clubs to permit flight within these zones.

These organisations will be consulted in any local policy changes and the Council may wish to consider any continuing use of its open spaces for this hobby, subject to explicit Air Traffic Control / aviation permissions being granted and also that, the Council itself is satisfied, particularly where there may be a conflict with other recreational or public users.

ENFORCEMENT OF ILLEGAL DRONE USE

Enforcement of illegal drone use in a restricted flight zone would be a matter for the Police. There is a fine currently set at £2500 to a maximum sentence of five years in prison for anyone negligently acting in a manner likely to endanger an aircraft or any person in an aircraft. The Government has also stated life sentences may be used for the most serious cases.

Outside the flight restriction zones, existing CAA rules will apply for recreational drone use, where it is illegal to fly above 400 feet or 50 metres away from people and property and 150 metres away from crowds and congested or built up areas. Additional permissions are required for commercial or filming drone activity.

Hillingdon Council can currently seek to prohibit the use of drones using PSPOs via a Fixed Penalty Notice (FPN) if they are on Council land, though as explained earlier these will need to be amended to be fully effective. The Council has no powers to enforce or report “legal” drone use (i.e. within the CAA rules above) on private land outside the restricted flight zone. However, it can be a criminal offence to fly a drone contrary to these CAA rules. For example, a successful prosecution was made in 2018 where a drone was flown near a helicopter search and rescue operation in a remote area away from an airport.

Away from the Council’s parks, there are other areas of land that residents may decide to recreationally fly a drone, including school playing fields and other community and sports facilities. The Council could use its powers as landlord to prohibit the flying of drones as part of any future leases, providing additional leverage, above an FPN, on such activity.

If a drone has a camera, its use has the potential to be covered by the Data Protection Act 2018 and related legislation. For professional purposes, drone operators may also have to adhere to the UK’s CCTV code of practice. If residents or the wider public have concerns in relation to the privacy of any drone use, e.g. possible voyeurism, then these should be referred to the Information Commissioner’s Office as the responsible authority in this regard.

INDUSTRY ANALYSIS

HM Government intend to soon introduce a compulsory weight threshold of 250g for drones, where anything above this weight must be registered and anything below does not need to be. It had been expected that HM Government would also apply this threshold within restricted flight zones, but this was dropped from the UK Air Navigation Order amendment, so that any drone, no matter its weight, are now prohibited in these restricted zones.

Current recreational drones can weigh between 1-2 kg with models able to potentially fly upwards to thousands of feet and be controlled from miles away. However, drone technology is adapting so that performance vs weight is no longer a limiting factor. During 2019, there will be a strong push by drone companies marketing affordable mini models under 250g, which are still expected to travel at good distances.

The drone industry has responded to safety concerns by installing intelligent safety features or geofencing, to combat irresponsible use near airports and built up areas and limiting how high they can fly. This can stop drones flying into flight restriction zones or over legal height limits as set by the Civil Aviation Authority (CAA). For law-abiding citizens, this will prevent them accidentally misusing a drone. However, it will never deter a fanatic with relevant technical knowledge to hack the built-in software to bypass these features. As reported in recent months, major airports including Heathrow, have now invested in military-grade anti-drone defences and whilst their full capability is not public, at a minimum it is understood they will be able to block the signal between a drone and its operator to land it safely.

COMMERCIAL & FILMING USE OF DRONES

There is growing commercial use of drones nationally, such as for news gathering and filming. Other markets are also making use of drone technology, e.g. house builders & estate agents to promote local properties. Increasingly, drones are becoming a critical tool in support of risk reduction and safety measures, e.g. viewing building work, crowd control at events etc....

Whether inside or outside the new restricted flight zones around airports, any commercial and business use, including filming requires explicit permission from the CAA.

In London, if use is related to filming, TV or the media, then this is currently processed through the London Film Office (FilmLondon). Supplementary to this, if such filming is planned on Council land, Hillingdon Council's permission is also required. Currently, such requests are considered on an informal and highly exceptional basis, with no formal policy in place.

OTHER LOCAL AUTHORITIES

Away from the new restriction flight zones, currently, UK National Parks, sensitive Government and military installations all have in place no-fly zones for the use of drones. All eight of London's Royal Parks are no-fly zones for recreational use, except a designated flying area in Richmond Park, near Sheen Cross. In some London boroughs, you can fly a drone but only if you have a licence first. For instance, in Lambeth's parks and open spaces this is restricted to authorised events only. Reviewing local authority policies in place (which are relatively few), these primarily make use of older byelaws, along with illuminating national legislation. A small number of local authorities also now charge for drone filming.

DEVISING A MODERN HILLINGDON DRONE POLICY

Given that approximately 74% of the Borough is already designated within expanded restricted airspace zones, it is recommended that the Council takes a robust "**total airspace**" approach in its policy development, concentrating in particular on what actions it may need to take in respect of the remaining 26% of the Borough's outside these zones (i.e. the geographic gaps), particularly on the Council's own land. Therefore, it is proposed that the policy objectives for consultation encompass the following:

A general prohibition across the whole Borough

- Re-affirming current CAA rules, the Drone Code and national rules prohibiting drones across all land within the new Flight Restriction Zones in the Borough;
- For commercial TV, broadcasting and filming, either via FilmLondon or directly to the Council, to propose a Borough-wide prohibition of drones on Council land, with any highly exceptional cases to be determined by the Leader of the Council. A commercial fee of £200 per flight take-off, negotiable thereafter, is proposed in such circumstances.
- For personal or recreational use, a general prohibition of drones across those designated Council owned parks and open spaces (approximately 26% of the Borough's land mass) that are outside the new flight restriction zones. This would require amending existing PSPOs for enforcement and implemented through Fixed Penalty Notices issued to those contravening in the designated parks and open spaces. There are 38 parks and open spaces outside these zones that this would apply to, as shown in the appendices.
- For future property agreements, to apply a new clause prohibiting any drone flying from Council land of relevant size, where it is leased by the Council as freeholder or landlord.

The rationale for such a proposal for a general prohibition is because:

- That across approximately 76% of the Borough, it is already illegal to fly any drone with the new airspace restrictions;
- The close proximity of the Council's parks and open spaces are adjacent to congested areas, neighbouring residential properties and there is the potential risk of causing alarm, distress or harassment to the occupants;
- The potential risk of accident, injury to other visitors to parks and green spaces or council property (including buildings and natural features) as a result of user or drone error;
- The potential risk of causing alarm, distress or harassment to the wildlife and biodiversity;
- That the CAA 'Drone Code' guidance specifies that drones must not be flown within 50m of people, vehicles and buildings and/or over congested areas;
- If granting permission universally, this could leave the Council liable for subsequent actions brought about by drone activity when operated from or over land in its ownership.

Special exemptions

On all Council owned land Borough-wide, it is proposed that a full exemption to fly drones is provided to:

- Emergency Services, e.g. crowd control at local events or monitoring fire/police activity.
- The Council, to use drones for safety related activity; for example, building control services or as part of any Emergency Response toolkit to feed live aerial views of major incidents, flooding etc... to Gold Command decision-makers at the Civic Centre.

(Noting permission from Airports / Air Traffic Control is still required if these organisations wish to fly within Flight Restricted Zones and that these public organisations will still need to comply with CAA guidelines)

Specific permissions

Where there is urgent or essential public safety, commercial or construction related need for a drone to take off from and/or land on Council owned land, including highways, it is proposed that explicit permission to fly drones is sought from the Council. In such cases, any application would be required to provide detailed flight plans, insurance details and any required additional CAA or Air Traffic Control permissions.

For accredited model aircraft flying clubs using Council land, it is proposed that they must apply to the Council for permission to use any of its open spaces for this hobby and only where explicit Air Traffic Control, Airport permission or CAA authority has been approved for their operations and notified to the Council. Additionally, noting that the Council may not grant permission to use its land where there is a conflict with other recreational or public users.

Based on the above policy objectives, a draft policy for consultation is set out in **Appendix 1**.

Application processing

A relevant service area will need to be identified to coordinate any exceptional drone applications / permissions as set out above, including appropriate staff training on the technical information and validation required in order to have an efficient commercial application process.

MODERNISING PUBLIC SPACE PROTECTION ORDERS

As previously mentioned, to complement the emerging Hillingdon Drone Policy, it is proposed to amend the existing (Parks and Public Spaces) Public Spaces Protection Order and consult on this through the required statutory process as set out in this report.

It is proposed to add a new paragraph (vii) under the conditions in the Order which are prohibitions. As advised by the Borough Solicitor, the proposed text would read:

'Using drones and small unmanned aircraft of any mass without the express consent of the Council'.

This wording mirrors that on the Council's proposed signage in parks and open spaces and the word "express consent" provides for where the Council may permit such use in the exceptional circumstances or exemptions as set out in the proposed Policy. The proposed amendment to the relevant PSPO for consultation is also set out in **Appendix 2**, shown **bold text underlined**.

FUTURE UK GOVERNMENT POLICY

The Home Office has announced new stop and search powers for drones around airports, which will be included in a new Drone Bill the Government is preparing later this year with further regulation. This will include the ability for the Police to issue Fixed Penalty Notices for minor drone-related offences.

Furthermore, the Civil Aviation Authority is developing a compulsory registration scheme and competency test for owners with drones 250 grams or more in weight, with effect from 30 November 2019. Anyone who fails to register or sit the competency tests could face fines of up to £1k. It was also recently announced in April that both existing and new drone owners (where their drone weighs over 250g) are to be charged a small fee to cover the costs of operating this new registration scheme.

FINANCIAL IMPLICATIONS

There are no new costs associated with the development of a local policy or changes to PSPOs. For the Council to install new signs across its parks and open spaces, this will be met from within existing Council budgets.

Subject to the approval of modernised PSPOs, the Council's Environment Enforcement Team will be able to enforce any flying of drones at no extra cost where an offence occurs on Council land outside the restricted flight zones. A fixed penalty notice of a maximum of £100 is proposed.

The draft policy proposes to charge a commercial fee of £200 where highly exceptional use is granted for individual flight applications for filming purposes on Council land. There is limited intelligence on drone fees in the public sector and neighbouring boroughs, though as a comparison the London Borough of Barnet and Bristol City Council charge £150 per application or flight for filming. Cardiff City Council charge £250 per day. It is therefore proposed a £200 fee would be a suitable starting rate along with some fee negotiability for extended drone use, e.g. over more than one day. It is not expected that much, if any at all, income will be received as this is on a highly exceptional basis. Any income from will be factored into Residents Services budgets and seek to cover administrative and technical validation.

No fee is proposed for any urgent commercial or public safety work authorised by the Council and similarly, for accredited local model flying organisations that may seek Council permission.

RESIDENT BENEFIT & CONSULTATION

The benefit or impact upon Hillingdon residents, service users and communities?

Any local drone policy or changes to PSPOs will have limited impact on those wishing to fly a drone across approximately 74% of the Borough as the new restricted airspace zones prohibit any use. Having robust local measures outside these zones, whilst also across all Council owned land, will ensure the safety of residents and their ability to enjoy all parks and open spaces without hazard. Specific exemptions or permissions may form a part of any new local policy to enable approved drone use by certain organisations.

Consultation carried out or required

Given that most of the Borough's landmass and population are unaffected by any new Council policy, it is proposed to undertake a targeted stakeholder consultation on the proposed drone policy over a 6 week period for views. Key organisations will include:

- Civil Aviation Authority (CAA)
- Heathrow Airport, Airfield Compliance
- RAF Northolt
- Denham Aerodrome
- Hayes and District Model Aero Club
- Little Harlington Model Flying Club
- London Film Office (FilmLondon)
- Metropolitan Police, West Area Basic Command Unit
- Relevant Council services - Planning Services, Green Spaces & Property Services
- Adjacent local authorities where restricted airspace overlaps with Hillingdon
- FPV UK - user association of recreational radio control drone and model aircraft

Recommendation 4 provides for delegated authority to the Leader of the Council to consider the consultation responses received and then authorise the final policy. Complimentary consultation on the Public Spaces Protection Order amendment proposed will be in accordance with statutory requirements and approved by the Deputy Chief Executive and Corporate Director of Residents Services, in consultation with the Leader of the Council.

Future local communications

The Council has already undertaken some publicity locally for residents and local organisations in respect of the new national drone restrictions around airports. In addition to this, any new policies and local laws agreed will be promoted locally.

CORPORATE CONSIDERATIONS

Corporate Finance

Corporate Finance has reviewed this report, noting that there are limited financial implications arising from the above recommendations. The proposed process of stakeholder engagement will be managed within existing resources, with any resulting ongoing management of revised local policies similarly expected to be managed within existing budgets. In relation to proposed charges in respect of commercial drones being operated on Council-owned land, these have been determined with reference to charges already adopted by other local authorities and will remain under review to ensure that administrative costs of any such activity do not unduly fall upon the local Council Taxpayer. As with other local charges, the annual budget setting process provides a mechanism to review and amend charges as appropriate.

Legal

As is set out in the body of the report, the Government has introduced the Air Navigation [Amendment Order] 2019 which means that with effect from 13 March 2019, there are Flight Restriction Zones in place which apply to 74% of the Borough.

With regard to the remaining parks and open spaces, it is proposed to introduce a new Policy on Drones and Small Unmanned Aircraft, coupled with an amendment to the Council's existing Public Space Protection Orders [PSPOs] which will give the Council the necessary enforcement powers, both of which are to be the subject of consultation.

The two proposals complement each other and therefore, subject to the consultation processes, they should ideally be introduced at the same time.

With regard to PSPOs, the relevant legislation is the Anti-social Behaviour, Crime and Policing Act 2014 and Regulations made pursuant to it. They require that before introducing, extending, varying or discharging a PSPO, there are certain mandatory requirements which the Council has to observe regarding consultation, publicity and notification.

Local authorities are required to consult with the local chief officer of police, the police and crime commissioner, owners or occupiers of land within the affected area where reasonably practicable, and appropriate community representatives.

A copy of the Council's current PSPO with the proposed amendments to it is attached as **Appendix 2** to the report.

As far as consultation on the draft Policy on Drones and Small Unmanned Aircraft is concerned, the proposed consultees are identified on page 13 of the report.

There are no strict rules governing the length of the consultation period, but 6 weeks would appear to be a reasonable period. There are a set of well-established common law rules which prescribe the requirements of a lawful public consultation which are commonly known as 'the Gunning principles'. They were endorsed by the Supreme Court in the Moseley case.

These principles can be briefly summarised as follows:

- consultations should occur when proposals are at a formative stage;
- consultations should give sufficient reasons for any proposal to permit intelligent consideration;
- consultations should allow adequate time for consideration and response;
- the product of consultation should conscientiously be taken into account by the decision maker.

It is imperative that all these principles are fully observed by the Council in this case.

BACKGROUND PAPERS

- [Dronesafe](#)
- [CAA website](#)
- [Department for Transport](#)