

Guidance Note No 002: The Operation of Drones at Excel London

Status	Reviewed V3 August 2022
Prepared by	John Sursham
Reviewed by	Tim Byrne
Original issue date	8 February 2018
Review date	December 2021 – January 2022
Revision frequency	Three years (or regulatory change)

Purpose

To address the increase in the number of requests to allow the operation of drones within the exhibition space and on the wider Excel London estate this guidance note has been drafted to provide information about current regulations affecting drone use and how they apply to operations at Excel.

Regulatory background

Air Navigation Order 2016

Guidance

Unmanned Aircraft System Operations in UK Airspace – Guidance CAP 722 CAA

Drone Code CAA

The Drone and Model Aircraft Code October 2019 (July 2022 update) CAA

Introduction

As drones have become more sophisticated, cheaper, and more widely available, Excel is frequently receiving requests to allow drone use within the Halls and around the open space areas. Amongst other uses, drones are used for filming, surveying, and leisure; however, this use is not without regulatory restrictions and potential operational risks.

Aside from any legal matters relating to drone use, their potential use at Excel presents several risks, outdoor drone use cannot avoid flying over public open spaces and thus there are significant issues with the potential for collision injuries and public liability insurance. Additionally, the airspace around Excel is restricted due to the proximity of London City Airport and the centre line of the approach/take off path being close to the waterfront. Indoor drone use, unless strictly controlled runs the risk of collision with people attending events, striking stands, and damage to the fabric of the building.

Definitions

Drones

Drones may be categorised in five ways – C0 / C1 / C2 / C3 / C4

Competencies

For any operations indoor and outside the following conditions must be met:

- Operators must hold a CAA flyer ID and operator ID,
- Pilot must hold a CAA operator ID, which is valid at the time of flight (CAA operator ID are valid for 12 months from date of issue. CAA flyer ID is valid for five years),
- To hold a CAA operator ID the pilot must have passed a Drone and Model Aircraft Code theory assessment,
- Preferred – Proof of current or historic CAA operational authorisation certificates (PDRA 01 / A2CofC), and
- Insurance specifically for drone liabilities must be in place and valid at the time of flight.

External drone operations

- All drone operations on the Excel estate must be authorised in writing by the venue as landlord for the Estate.
- Non-commercial outdoor drone use will not be authorised.
- Any application for commercial outdoor drone flying will be considered on its merit; however, the general presumption is that only in exceptional circumstances will permission be granted.
- Excel and estate are included as part of the London City Airport, Flight Restriction Zones (FRZs).
- The nearest part of Excel is less than 500m from the end of the runway at London City Airport, and within 100m from the centre line of the approach/take off flight path.
- London City Airport operates daily from 06.30am to 22.30pm, except at weekends when flying operations ceases at 13.00pm on Saturday and resumes at 12.30pm on Sundays.
- Before permission could be granted by Excel, the organiser / drone operator must legally obtain air traffic control permission in advance from London City Airport for the proposed flight. This can be done by filling a request with NATS <https://nsf.nats.aero/>.
- All car parks, waterfront, traffic management areas, and roadways on the Excel estate are open to the public and proposed drone operations should take this into account. CAA restrictions – No operating of drones within 50m of public or 150m from residential and commercial areas.
- Planned drone operations over the Royal Victoria Dock must be approved by the 'Royal Docks Management Authority (RoDMA).

Internal non-commercial operations

- Non-commercial drones will only be permitted in the Halls within a defined space with appropriate netting to the sides and top.
- A defined viewing zone 0.5m away from the netting.
- The netting should be taught and firmly secured to prevent movement if struck by a drone.
- Except on those occasions when very lightweight (toy) drones are proposed there should be a 500mm gap between the edge of the aisle and the netting to prevent the netting bulging if struck by a drone.
- The organiser should provide to Excel a risk assessment and details of the proposed operations, which should include:
 - Details of the netting,
 - The size and weight of the drone,
 - Arrangements for charging and servicing the drone,
 - Details of who will be piloting the drone, or overseeing the display, and
 - If it is 'have a go' type of operation for the public, details of measures to isolate the drone in the event of entanglement in the netting.

Indoor commercial operations

- Drone flying may only take place when everyone in the Halls is under the control of the person in charge of the aircraft.
- Organisers / Operators should always ensure when drone flying operations are being undertaken that the Halls are secured to prevent unauthorised access.
- Where Halls are under the exclusive control of one organiser, for example film shoots, then the organiser is responsible for ensuring that everyone in the Hall is briefed about flying operations and that they are placed under the control of the person in charge of the aircraft.
- During exhibitions the requirement for all persons to be under the control of the person in charge of the aircraft, specifically excludes operations:
 - During opening hours when the public are present.
 - During the hours when other exhibitions are in the Halls.
 - At times when Excel's own staff are in the Halls e.g. cleaners or riggers.

The most likely times when operations may be considered are outside tenancy hours provided the organiser has measures in place to prevent unauthorised access.

- Exhibition organisers must ensure that operations are planned and monitored to prevent damage to third party stands and suspended banners etc.
- Organisers must provide Excel the following information:

- Details of the drone to be used,
- Details of the competency of the pilot,
- Evidence of public liability insurance specifically for drone use,
- Times when operations will be conducted,
- A risk assessment specifically for the planned drone operations, and
- Planned flight path.